



KINGDOM OF CAMBODIA

Nation Religion King



Ministry of Mines and Energy (MME)



Electricité du Cambodge (EDC)

**Cambodia Sustainable Energy Transition Project
(P510217)**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)
(Draft Version)**

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ABBREVIATIONS

AMI	Advanced Metering Infrastructure
AP	Affected Person
ARK	Arey Ksat Substation
BESS	Battery Energy Storage System
CBOs	Community Based Organizations
CCV III	Chroy Chang Va III
CNCW	Cambodian National Council for Women
CPOs	Charge Point Operators
CSET	Cambodia Sustainable Energy Transition
CSOs	Civil Society Organizations
DGRC	District Grievance Redress Committee
E&S	Environmental and Social
EAC	Electricity Authority of Cambodia
EDC	Electricité du Cambodge
EE	Energy Efficiency
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESSs	Environmental and Social Standards
EV	Electric Vehicle
FAQs	Frequently Asked Questions
FGDs	Focal Group Discussions
FIs	Financial Intermediaries
FPIC	Free, Prior, and Informed Consent
GBV	Gender-Based Violence
GHG	Greenhouse Gas
GIS	Geographic Information System
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
GS	Grid Substation
ID	Identification
IDA	International Development Association
IE	Industrial Enterprise
JP	Judicial Police
LNG	Liquefied Natural Gas
kV	kilovolt
LV	Low Voltage
MISTI	Ministry of Industry, Science, Technology and Innovation
MLMUPC	Ministry of Land Management, Urban Planning, and Construction
MME	Ministry of Mines and energy
MoH	Ministry of Health
MoWA	Ministry of Women's Affairs
MV	Medium Voltage
MW	Megawatt
NEEP	National Energy Efficiency Program
NGOs	Non-Governmental Organizations
PD	Public Disclosure
PFI	Participating Financial Institution

PGRC	Provincial Grievance Redress Committee
PIC	Project Implementation Consultant
PMO	Project Management Office
PMU	Project Management Unit
QA	Questions and Answers
REE	Rural Electrification Enterprises
RGC	Royal Government of Cambodia
SCADA	Supervisory Control and Data Acquisition
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SEPRO	Social, Environmental, and Public Relations Office
SME	Small and Medium Enterprise Bank of Cambodia
SMS	Short Message Service
SOPs	Standard Operating Procedures
TBD	To be determined

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Definitions

Affected Parties

The term “project-affected parties” includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.

Interested Parties

The term “other interested parties” refers to individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women organizations, other civil society organizations, and cultural groups.

Disadvantaged/ Vulnerable Parties

Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community, or other individuals upon which they depend.

This also includes people with disabilities, ethnic or linguistic minorities, and others who may face sociopolitical, economic, or practical barriers to participation. These barriers may arise from low income, limited mobility, illiteracy, or discrimination, and may require tailored engagement approaches to ensure their effective inclusion in the project.

1. BRIEF DESCRIPTION OF THE PROJECT

1.1. Project Background

The Royal Government of Cambodia (RGC), through the Ministry of Mines and energy (MME) and Electricité du Cambodge (EDC), is collaborating with the World Bank to implement the Cambodia Sustainable Energy Transition (CSET) Project. The project aims to support Cambodia's energy transition by strengthening power grid infrastructure and industrial energy efficiency. To ensure compliance with environmental and social safeguards standards, an Environmental and Social Management Framework (ESMF) is developed in line with the World Bank Environmental and Social Standards (ESSs) and relevant Cambodian regulations.

1.2. Project Objectives

The project aims to strengthen power grid infrastructure and improve energy efficiency by:

- strengthening grid reliability and capacity in the Phnom Penh–Kandal corridor.
- deploying grid-scale Battery Energy Storage Systems (BESS) to enable renewable integration and load shifting.
- expanding and reinforcing distribution networks in priority EDC service areas and
- supporting industrial energy-efficiency financing through a simplified credit-line arrangement managed by MME.

These objectives align with the goals of the National Energy Efficiency Program (NEEP) and the government's socio-economic development agenda.

1.3. Components of the Project (as of 31 October)

The CSET project, supported by a \$150 million IDA loan from the World Bank, includes the following key components:

Component 1: Grid strengthening for Energy Transition (Implemented by EDC – US\$ 115 million IDA)

This component addresses the urgent need to reinforce grid capacity and reliability in support of renewable-energy integration. It includes three sub-components.

- **Sub-Component 1.1 Grid Strengthening (Transmission Lines and Substations) (US\$ 43.5 million)**

Construction of one 230 kV and one 115 kV double-circuit transmission line (approx. 15 km) connecting Lvea Am – Arey Ksat – Chroy Changvar III – Wat Phnom, including two new GIS substations (ARK and CCVIII), extensions of 230kV Line Bays at GS Lvea Am and extensions of 115kV Line Bays at GS Wat Phnom and GS9. Supports Phnom Penh load growth and clean-power imports from Laos.

- **Sub-Component 1.2 Battery Energy Storage System (BESS) (US\$ 35 million)**

Deployment of 100–150 MW grid-scale BESS to enhance system stability and enable load shifting for renewable energy integration.

- **Sub-Component 1.3 Distribution Network Expansion and Strengthening (US\$ 15 million)**

Upgrade and extend distribution lines (MV (underground, overhead lines), poles, transformers) in EDC license areas to reduce losses and improve service quality; prepare for future e-mobility connections and EV infrastructure. Installation of Advanced Meter Infrastructure (AMI) will also be included as part of the component.

Component 2: Industrial Energy Efficiency Improvement (Implemented by MME – US\$ 15 million IDA)

This component promotes the adoption of energy-efficient technologies across Cambodia’s industrial sector through concessional credit facilities.

- **Sub-Component 2.1 Industrial Energy Efficiency Credit Line (US\$ 15 million)**
Establishment of a credit line managed by MME and implemented through the SME Bank of Cambodia (as Policy Bank) and the Foreign Trade Bank (FTB) (as Participating Financial Institution). Financing will be provided to industrial enterprises for eligible energy-efficiency technologies. The credit line will support both direct (Type-A) lending model and indirect (Type-B) lending model.

Component 3: Implementation Support and Technical Assistance (US\$ 6.5 million – US\$ 1.5 million IDA + US\$ 5 million Grant)

- **Sub-component 3.1 Implementation Support to MME (US\$ 5 million/Grant)**
Grant support to strengthen MME capacity to manage the energy-efficiency credit line and oversee environmental and social risk management. Covers training, technical consultancy, development of Operational Manual, and ESMS capacity building for policy banks.
- **Sub-component 3.2 Implementation Support to EDC (US\$ 1.5 million/IDA)**
Technical and safeguards support for EDC’s PMU on procurement, financial management, engineering supervision, and E&S compliance monitoring through SEPRO.

The description of sub-component and target project locations in different provinces across Cambodia are summarised in the table below.

Table 1-1 List of Components with Short Description and Project Location

Component	Description	Implementing agency	Location
Component 1: Grid Strengthening for facilitation of Energy Transition			
Sub - Component 1.1: Transmission Lines and Substations	Approximately 15 km of 230 kV double-circuit overhead transmission line connecting the existing Lvea Am (LVA) substation to the proposed Arey Ksat (ARK) substation. Construction of two new GIS substations at ARK and CCVIII, together with two 230 kV line-Bay extensions at LVA and 115kV line-Bay extensions at GS Wat Phnom and GS9.	EDC	Phnom Penh and Kandal Provinces
Sub-Component 1.2: Battery Energy Storage System (BESS)	Deployment of 100–150 MW stand-alone Battery Energy Storage System to support frequency control (primary, secondary, tertiary), load shifting, and enhanced renewable energy integration.	EDC	Tboung Khmum Province
Sub-Component 1.3: Distribution Network Expansion and Strengthening	This sub-component aims to improve the reliability, resilience, and operational efficiency of Cambodia’s power-distribution network within EDC-licensed service areas. It will finance upgrades and extensions of medium-voltage networks—including overhead and underground lines, poles, transformers, and switchgear—to reduce technical losses, address growing electricity demand, and enhance voltage stability in both urban and rural load centers.	EDC	Battambang, Kampong Cham, Kampong Chhnang, Kampong Thom, Kandal, Kep, Koh Kong, Kratie, Mondul Kiri, Phnom Penh, Preah Sihanouk, Preah Vihear, Prey Veng, Pursat, Siem Reap, Steung Treng, Svay Rieng, Takeo, and

Component	Description	Implementing agency	Location
	Installation of AMI meters and SCADA system for digital grid management, targeting 3-phase and some single-phase meters.		Tboung Khmum (19 provinces)
Component 2: Industrial Energy Efficiency Investments			
Sub-Component 2.1: Industrial Energy Efficiency Credit Line	Establishment of a credit line managed by MME and implemented through the SME Bank of Cambodia (as Policy Bank) and the Foreign Trade Bank (FTB) (as Participating Financial Institution). Financing will be provided to industrial enterprises for eligible energy-efficiency technologies. The credit line will support both direct (Type-A) lending model and indirect (Type-B) lending model.	MME	TBD
Component 3: Implementation Support and Technical Assistance			
Sub-Component 3.1: Implementation Support to MME	Grant support to strengthen MME capacity to manage the energy-efficiency credit line and oversee environmental and social risk management. Covers training, technical consultancy, development of Operational Manual, and ESMS capacity building for policy banks.	MME	
Sub-component 3.2 Implementation Support to EDC	Technical and safeguards support for EDC's PMU on procurement, financial management, engineering supervision, and E&S compliance monitoring through SEPRO.	EDC	

Note: TBD - to be determined

1.4. Execution Agencies under CSET Project

The execution agencies involving in Component 1 of the CSET project are listed as follow:

1. Electricité du Cambodge (EDC) as the implementing agency

The execution agencies involving in Component 2 of the CSET project are listed as follow:

1. Ministry of Mines and Energy (MME) as the implementing agency
2. Ministry of Industry, Science, Technology & Innovation (MISTI) as the implementing partner
3. Small and Medium Enterprise Bank of Cambodia (SME) as policy bank
4. Foreign Trade Bank (FTB) as participating financial institution

2. OBJECTIVES OF SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the Ministry of Mines and energy (MME) and Electricité du Cambodge (EDC) will communicate with all involved stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

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3. STAKEHOLDER IDENTIFICATION AND ANALYSIS PER PROJECT COMPONENT

3.1. Methodology

In order to meet the best practice approaches, the project will apply the following principles for stakeholder identification:

- *Inclusiveness and Relevance:* All relevant stakeholders, including affected parties, vulnerable and disadvantaged individuals, and groups, and other interested parties such as government agencies, Non-Governmental Organizations (NGOs), and private sector entities will be identified. It will focus on stakeholders with direct or indirect influence on or interest in the project.
- *Transparency:* Clear and accessible criteria are used to identify and engage stakeholders, based on information from sectoral institutions, local authorities, consultations, and publicly available data.
- *Continuous Analysis:* Stakeholder identification is an ongoing process and will be updated throughout the project life cycle, especially as locations become clearer and new actors emerge

For the Cambodia Sustainable Energy Transition (CSET) Project, the following stakeholders have been identified and analyzed per project component and its sub-components. These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

3.2. Affected Parties

Affected parties under this project include those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, wellbeing, or livelihoods. These stakeholders may include individuals or groups, including direct project beneficiaries and local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project – either positively or negatively, or both (hereafter “affected parties”). Specifically, the indicative project affected parties are listed below:

Table 3-1 List of Affected Parties by Component

Component	Affected Parties			
	Positively Affected	Impact Level	Negatively Affected	Impact Level
Component 1: Grid Strengthening for Energy Transition				
Sub - Component 1.1: Transmission Lines and Substations	Local Communities (grid-connected households, businesses) with the benefits such as : <ul style="list-style-type: none"> ● Improved electricity reliability, better services, and reduced blackouts. ● Increased in number of households access to electricity. ● Economic opportunities through growth of business operations ● Expansion of industrial and business activities supported by reliable energy supply. ● New investments and opportunities in previously underserved areas. 	High	Local Communities / landowners with the potential impacts such as: <ul style="list-style-type: none"> ● May face land acquisition for transmission towers and substations, resulting in potential physical or economic displacement and restricted access to land. ● Temporary noise, dust, and traffic disruptions caused by construction activities. ● Visually impacted by the transmission towers and cables in the surrounding environment. 	High

Component	Affected Parties			
	Positively Affected	Impact Level	Negatively Affected	Impact Level
			<ul style="list-style-type: none"> Health and safety concerns by the existence of transmission lines due to electromagnetic fields. 	
	Employment seekers/local labor force with the benefits such as : <ul style="list-style-type: none"> Short-term job opportunities during construction Job creation in maintenance, and operation. 	Medium		
Sub-Component 1.2: Battery Energy Storage System (BESS)	Industrial & Commercial Businesses with the benefits such as : <ul style="list-style-type: none"> Reduction in operational downtime for factories and businesses due to more reliable power supply. Lower electricity costs in the long run if renewable energy investments bring down tariffs. Local Communities (Urban Residents and Rural communities) with the benefits such as : <ul style="list-style-type: none"> More reliable and resilient electricity supply, particularly during peak demand. Reduced blackouts and improved rural electrification reliability. 	High	Staff at the BESS site with the potential impacts such as: <ul style="list-style-type: none"> Could face the safety risks (e.g., fire, chemical leakage, electric shock). Nearby Land Users (farmers) with the potential impacts such as: <ul style="list-style-type: none"> Could be affected by visual impacts, or fear of safety risks (e.g., fire, chemical leakage). May raise concerns regarding safety, noise, and emergency planning. 	Low
Sub-Component 1.3: Distribution Network Expansion and Strengthening and AMI/SCADA Integration Sub - Component 1.2:	Local Communities with the benefits such as : <ul style="list-style-type: none"> Gain better access to grid electricity, improving education, health, and economic activity in rural area. 	High	Local communities / landowners with the potential impacts such as: <ul style="list-style-type: none"> Temporary construction-related disturbances such as dust, noise, and restricted access during line or pole installation. Potential localized temporary land disturbance for pole and transformer placement. Minor safety risks to nearby residents if construction sites are not properly managed. 	Low -
	Small Business Owners, private investors and Entrepreneurs with the benefits such as : <ul style="list-style-type: none"> Opportunities for better income generation (e.g., cold storage) Gain the support for the investment of private investors (e.g. EV charging stations) 	Medium - High	Road users and pedestrians with the potential impacts such as: <ul style="list-style-type: none"> Temporary traffic obstruction and safety risks during distribution line installation in populated or roadside areas. 	Low
	Local Communities (residents) with the benefits such as : <ul style="list-style-type: none"> Improved electricity supply reliability and capacity for larger electrical loads due to AMI installation. Reduced voltage drops and electrical appliance damage. Enhance in the accessibility of EV charging stations 	High	Local Communities (Building Owners and Landlords) with the potential impacts such as: <ul style="list-style-type: none"> May face involuntary upgrade requirements and increased costs without corresponding benefits. Small Businesses with Low Electricity Needs	Low

Component	Affected Parties			
	Positively Affected	Impact Level	Negatively Affected	Impact Level
	Small and Medium Enterprises with the benefits such as : <ul style="list-style-type: none"> Stable power for running machinery and refrigeration units. Higher capacity to expand operations without electricity constraints. 		<ul style="list-style-type: none"> Could face tariff or metering changes that increase their operational cost. 	
Component 2: Industrial Energy Efficiency Investments				
Sub-Component 2.1 - Industrial Energy Efficiency Credit Line	Industrial, Utility service providers, and Commercial Businesses with the benefits such as : <ul style="list-style-type: none"> Access to affordable financing for upgrading to energy-efficient equipment. Reduction in operating costs through lower energy bills. Increased competitiveness and productivity. SME and FTB with the benefits such as : <ul style="list-style-type: none"> Expansion of green finance portfolios and reputational enhancement. New customer acquisition and loan portfolio growth. Energy-Efficient Equipment Manufacturers and Suppliers with the benefits such as : <ul style="list-style-type: none"> Increased sales opportunities for modern and efficient technologies. 	High	Private Commercial Banks (non-state-owned) with the potential impacts such as: <ul style="list-style-type: none"> Increased competition with subsidized loans from state-owned bank (SME Bank) and commercial bank (FTB) affecting their industrial customer base. 	Medium
	Industrial/Sectoral Workers with the benefits such as : <ul style="list-style-type: none"> Improved working conditions and safer, cleaner workplaces. 	Medium	Industrial Zones with Weak Power Infrastructure with the potential impacts such as: <ul style="list-style-type: none"> Potential risks of imbalance if industrial energy efficiency growth is not matched by grid and infrastructure upgrades. 	Low
Component 3: Implementation Support and Technical Assistance				
Sub-Component 3.1: Implementation Support to MME	MME staff with the benefits such as : <ul style="list-style-type: none"> Enhanced technical skills Improved institutional capacity for sector regulation, planning, and policy implementation. Improved service delivery and operational efficiency. Increased ability to design and manage energy efficiency financing products. 	High	Staff of MME, Policy Bank, and PFI with the potential impacts such as: <ul style="list-style-type: none"> Temporary increase in workload and responsibilities during training and implementation phases. 	Low
	Policy bank and PFI with the benefits such as : <ul style="list-style-type: none"> Improved capacity of financial institutions (e.g. financial and environmental and social management) 	Medium	Institutional Management Teams with the potential impacts such as: <ul style="list-style-type: none"> Short term administrative burden to integrate new systems, standards, and monitoring frameworks. 	Low

Component	Affected Parties			
	Positively Affected	Impact Level	Negatively Affected	Impact Level
Sub-component 3.2 Implementation Support to EDC	<p>EDC staff with the benefits such as :</p> <ul style="list-style-type: none"> Enhanced technical skills Improved institutional capacity for sector regulation, planning, and policy implementation. Improved service delivery and operational efficiency. Increased ability to design and manage energy efficiency financing products. 	High	<p>Staff of EDC with the potential impacts such as:</p> <ul style="list-style-type: none"> Temporary increase in workload and responsibilities during training and implementation phases. 	Low

3.3. Other Interested Parties

Other Interested Parties under this project include parties other than the directly affected (hereafter “other interested parties”). Specifically, the indicative other interested parties are listed below:

Table 3-2 List of Other Interested Parties by Component

Component	Other Interested Parties	Level of Interest
Component 1: Grid Strengthening for Energy Transition		
	<p>Municipal and local authorities / Ministry of Land Management, Urban Planning and Construction (MLMUPC)</p> <ul style="list-style-type: none"> Difficulties in managing social tensions/ complaints caused by the Project such as land acquisition during planning, and construction phases 	Medium
	<p>Ministry of Environment</p> <ul style="list-style-type: none"> Compliance with environmental regulations for the involved infrastructure development such as new substations and transmission lines and distribution network improvement. 	High
	<p>Environmental NGOs/Biodiversity advocates; NGOs related to cultural heritage.</p> <ul style="list-style-type: none"> Adverse impacts on habitats/key biodiversity areas/protected areas with risks to wildlife (especially birds) Potential risk to historical/religious sites if transmission line routes or distribution network are not well planned 	Medium-High
	<p>Future Developer/Investors in Phnom Penh and Kandal Provinces</p> <ul style="list-style-type: none"> Business development in City areas with reliable electricity supply 	Medium
Sub-Component 1.2: Battery Energy Storage System (BESS)	<p>Electric Utility Companies</p> <ul style="list-style-type: none"> Better grid management and ability to integrate renewable energy sources. 	High
	<p>Government and Regulators</p> <ul style="list-style-type: none"> BESS Strategic Plan 	Medium
	<p>Ministry of Environment</p> <ul style="list-style-type: none"> Potential environmental concerns including Battery Disposal when it is expired. 	Medium
	<p>Emergency Services (hospitals, police, fire stations)</p> <ul style="list-style-type: none"> Enhanced reliability for critical operations. 	Low
	<p>Municipal and local authorities (urban and rural)</p> <ul style="list-style-type: none"> Management of public concerns and technical capacity challenges. 	Low
	National and Provincial Governments	High

Component	Other Interested Parties	Level of Interest
Sub-Component 1.3: Distribution Network Expansion and Strengthening	<ul style="list-style-type: none"> Progress in rural electrification targets and social development indicators. 	
	Local CSOs and service providers <ul style="list-style-type: none"> Can expand programs (e.g., clinics, community centers) into electrified areas. 	Medium
	NGOs and Development Agencies <ul style="list-style-type: none"> Easier implementation of development projects with better electrified area and villages. 	Medium
Component 2: Industrial Energy Efficiency Investments		
Sub-Component 2.1 - Industrial Energy Efficiency Credit Line	Government and Ministries <ul style="list-style-type: none"> Progress toward national energy efficiency and climate change mitigation goals. Industrial sector modernization supporting economic development strategies. 	High
	Electric Utilities (EDC) <ul style="list-style-type: none"> Reduction in peak load demands, easing pressure on the grid. Improved grid stability and management. 	Medium
	Environmental and Climate Advocacy Organizations <ul style="list-style-type: none"> Reduction of industrial greenhouse gas emissions and environmental pollution. 	Medium
Component 3: Implementation Support and Technical Assistance		
Sub-Component 3.1: Implementation Support to MME Sub-component 3.2 Implementation Support to EDC	Government (National/Provincial/District) <ul style="list-style-type: none"> Interest in ensuring successful delivery of national energy objectives and sectoral reforms. 	Medium

3.4. Disadvantaged/ Vulnerable Individuals or Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. Within the Project, the vulnerable or disadvantaged groups may include but are not limited to the following:

Table 3-3 List of Disadvantaged / Vulnerable individuals or groups

Component	Disadvantaged/ Vulnerable Individuals or groups	Why they are vulnerable	Barriers
Component 1: Grid Strengthening for facilitation of Energy Transition			
Sub - Component 1.1: Transmission Lines and Substations	Indigenous Peoples and Ethnic Minorities if presence in the project area	<ul style="list-style-type: none"> Loss of access to traditional lands or sacred sites located within project area. Traditional lands may be affected without proper consultation. 	<ul style="list-style-type: none"> Limited participation in land negotiation and decision-making. Lack of legal land ownership in indigenous communities may lead to not receiving fair compensation for land loss. Limited access to grievance mechanisms because of communication barriers.
	Elderly and Disabled Persons	<ul style="list-style-type: none"> Safety risks during construction (e.g., traffic, mobility hazards). 	<ul style="list-style-type: none"> Difficulty accessing grievance redress mechanisms. Mobility challenges.
	Informal Land Occupants	<ul style="list-style-type: none"> Loss of informal use rights without official recognition. 	<ul style="list-style-type: none"> Ineligibility for compensation Legal exclusion.
	Fishing and River- Dependent Communities if presence in the project area	<ul style="list-style-type: none"> Disruption of local fisheries and livelihoods if fishing areas are located 	<ul style="list-style-type: none"> Limited alternative livelihood opportunities.

Component	Disadvantaged/ Vulnerable Individuals or groups	Why they are vulnerable	Barriers
		within the project sites.	
Sub-Component 1.2: Battery Energy Storage Investment	Local Communities (farmers)	<ul style="list-style-type: none"> May fear Health and safety concerns (battery fire risks, noise from operation) regardless of actual risks. Visual impacts of new BESS facilities. 	<ul style="list-style-type: none"> Lack of risk communication or emergency preparedness plans.
	Indigenous Peoples (if BESS near sensitive lands)	<ul style="list-style-type: none"> Potential loss of land access and sacred sites 	<ul style="list-style-type: none"> Insufficient consultation and mitigation measures.
Sub-Component 1.3: Distribution Network Expansion and Strengthening	Indigenous Peoples and Ethnic Minorities if presence in the project area	<ul style="list-style-type: none"> Loss of cultural and spiritual lands during network expansion, 	<ul style="list-style-type: none"> Insufficient free, prior, and informed consent (FPIC) processes.
	Poor Rural Communities	<ul style="list-style-type: none"> Difficulty accessing affordable electricity services. 	<ul style="list-style-type: none"> Relatively high installation cost for them. Limited infrastructure and maintenance support.
	Women and Girls in Rural Areas	<ul style="list-style-type: none"> Risk of exclusion from electricity-linked benefits. 	<ul style="list-style-type: none"> Cultural barriers limiting participation in decision-making.
	Stateless ethnic Vietnamese in floating villages	<ul style="list-style-type: none"> Lack formal citizenship or legal recognition, which limits access to official services and protection. 	<ul style="list-style-type: none"> Absence of national ID or formal documentation makes signing user agreements or receiving benefits difficult. Potential exclusion from project benefits if strict ID requirements are imposed. Necessity to collaborate with local government for their legal status.
Component 2: Industrial Energy Efficiency Investments			
Sub-Component 2.1: Industrial Energy Efficiency Credit Line	Small Industrial Enterprises (low-capacity, informal sector businesses)	<ul style="list-style-type: none"> Difficulty accessing loans. Risk of being left behind in modernization efforts. 	<ul style="list-style-type: none"> Strict credit or collateral requirements. Lack of awareness of loan programs.
	Workers in Traditional Manual Industries	<ul style="list-style-type: none"> Risk of job losses if automation increases with the installation of energy-efficient machinery. 	<ul style="list-style-type: none"> Lack of training program.
Component 3: Implementation Support and Technical Assistance			
Sub-Component 3.1: Implementation Support to MME	Older and Less Technically Skilled Staff	<ul style="list-style-type: none"> Difficulty adapting to new technical training and systems. 	<ul style="list-style-type: none"> Lack of specific training support Fear of job displacement
	Female and Junior / Contract Staff	<ul style="list-style-type: none"> May be excluded from training or decision-making roles. 	<ul style="list-style-type: none"> Gender bias and underrepresentation in leadership. Limited access to high-level training Temporary or lower-status positions may be overlooked
Sub-Component 3.2: Implementation Support to EDC			

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

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Summary of Stakeholder Engagement during Project Preparation

During project preparation, the Electricity du Cambodge (EDC) and the Ministry of Mines and Energy (MME) are continuously engaged with different and potential stakeholders to be involved in the proposed project such as other governmental agencies, and local financial institutions to assess their intended roles in project implementation and policy alignment. Moreover, the EDC has been conducting the stakeholder consultations and field data collection concurrently to maximize engagement and ensure in-depth community participation while performing preliminary social assessment. During the field visits to the proposed project locations in rural areas, the consultations with stakeholders such as provincial EDCs, REEs, commune officers, and village community are conducted to gather their perspectives and needs related to the proposed activities.

Table 4-1 List of Consultations During Field Visits

No.	Provinces	Villages	Mode of Consultation	Participants	Dates
1	Kratie	Damre, Kampong Rotes, Koh Dambong	FGD, KII	Representative from provincial EDC, commune chief, villagers and REEs	February 26, 2025
2	Steung Treng	Koh Chrim	FGD, KII	Representative from provincial EDC, village chiefs, villagers, Company representative(s) from REE	February 27, 2025
3.	Steng Traeng	Koh Chheur, Teal Touch, Koh Phnoa	FGD, KII	Villagers, representative from village/ commune chief	June 2, 2025 June 3, 2025
4.	Steng Traeng	Koh Hib	FGD KII	Villagers, Representative from village/ commune chief	June 4, 2025
5.	Kratie	Ampil Teuk, Kampong, Krobei	FGD KII	Indigenous people representative Indigenous people representative	June 5, 2025
6.	Pursat	Phnom Preak	FGD KII	Villagers from floating village Villagers	June 6, 2025
7.	Preu Veng	Koh Peam Raing	FGD KII	Representative from village/ commune chief Villagers, Representative from village/ commune chief	June 7, 2025
8.	Stung Treng	Koh Chheur Teal Touch	FGD, KII	Local authorities, community members including women, youth, and vulnerable groups (ID Poor households, persons with disabilities)	June 2, 2025
9.	Stung Treng	Koh Phnov, Koh Hib,	FGD, KII	Local authorities, community members including women, youth, and vulnerable groups (ID Poor households, persons with disabilities)	June 3, 2025 June 4, 2025
10.	Kratie	Ampil Teuk, Kampong Krobei, Koh Pdao, Koh Samphin	FGD, KII	Local authorities, community members including women, youth, and vulnerable groups (ID Poor households, persons with disabilities)	June 5, 2025

No.	Provinces	Villages	Mode of Consultation	Participants	Dates
11.	Pursat	Phum Preak	FGD, KII	Local authorities, community members including women, youth, and vulnerable groups (ID Poor households, persons with disabilities)	June 5, 2025
12.	Prey Veng	Koh Peam Reang,	FGD, KII	Local authorities, community members including women, youth, and vulnerable groups (ID Poor households, persons with disabilities)	June 7, 2025
13.	Takeo	Bak Dai	FGD, KII	Local authorities, community members including women, youth, and vulnerable groups (ID Poor households, persons with disabilities)	xxxxx
14.	Kandal	Koh Reah	FGD, KII	Local authorities, community members including women, youth, and vulnerable groups (ID Poor households, persons with disabilities)	xxxxx

As shown in the table above, a series of consultations were conducted during the field visit. Detailed findings from the FGDs and KIIs can be found in Annex 5. The notable and key findings are summarized as follows:

Consultation & Participation

- Villagers prefer face-to-face meetings and oral announcements via village loudspeakers or pagoda, rather than written notices.
- Schedule consultations after farming hours to allow both husbands and wives to attend.
- Include women, youth, poorer households, and vulnerable groups in consultations.
- Coordinate engagement through local leaders; possibly form village electrification committees with women and youth representatives.

Safety & Construction

- Fence off hazardous areas; insulate live wires; provide advance notice for large vehicle deliveries.
- Provide electricity safety training for households; inspect wiring; use surge protectors.
- Provide life jackets for river transport; coordinate with relevant agencies in UXO-risk areas.
- Contractors must follow community codes of conduct, preventing harassment and GBV.

Land & Agriculture

- Avoid pole/line installation during harvest season; provide fair compensation for crops/trees.
- Lao-speaking elders request bilingual communication (Lao/Khmer).

Labor & Local Employment

- Prioritize local hiring; ensure fair wages, gender equity, and no child labor.
- Hire local female staff to ensure safe reporting channels for women.

Grievance Mechanisms

- Dedicated project phone line and feedback boxes in commune offices or village halls.
- Older and non-Khmer speakers need oral explanations or liaison support.

Cultural & Religious Considerations

- Avoid disruption near pagodas, schools, and religious events (e.g., Pchum Ben, Friday prayers, Ramadan).
- Multi-ethnic villages need inclusive and respectful engagement.
- Some communities (Kratie, Stung Treng) emphasized respect for Neak Ta (local guardian spirits).
- Before any excavation, tree clearing, or disturbing ponds/large trees, villagers want the project to inform village elders and the Neak Ta medium.
- Certain natural features (large trees, ponds, riverbank spots) are believed to be spirit-inhabited; communities request avoidance or minimal disturbance.
- For Cham Muslims: respect religious schedules for Cham Muslim households (e.g., Ramadan, Friday prayers); no alcohol and pork consumption near their homes; avoid loud work during prayer times.

Other Requests

- Women specifically requested lighting along paths to water wells or river access points for safety.
- Coordinate with NGOs or local committees for environmental or special community concerns.

During project preparation, the following public consultation meetings related to the disclosure of ESMF and its associated plans and procedures will be conducted. The indicative example of invitation for virtual and/or in-person consultations is presented in Annex 1. Also, the meeting minutes including the feedbacks to the stakeholders should be properly recorded as indicated in Annex 2.

Table 4-2 List of Planned Public Consultations at Project Preparation

Sub-Component	Level	Target Areas	Mode of Consultation	Target Participants	Responsible Agencies	Timing
Sub - Component 1.1: Transmission Lines and Substations	National Level		Virtual & In person	MoE, Ministry of Land Management, Urban Planning and Construction (MLMUPC), and identified in Table 3-1, Table 3-2, and Table 3-3	EDC	Preparation of ESMF
	Provincial Level	Phnom Penh and Kandal Provinces	In person			Preparation of ESMF/ESIA/ESMP
	District Level		In person			Preparation of ESIA/ESMP
Sub-Component 1.2: Battery Energy Storage System (BESS)	District/Commune Level	District/Communes in Target Provinces	In person	MoE, MISTI, and identified in Table 3-1, Table 3-2, and Table 3-3		Preparation of ESMP
Sub-Component 1.3: Distribution Network Expansion and Strengthening	Provincial Level	Target Provinces	Virtual & In person	MoE, and identified in Table 3-1, Table 3-2, and Table 3-3		Preparation of ESMF
	District/Commune Level	District/Communes in Target Provinces	In person			Preparation of ESMP
Sub-Component 2.1: Industrial Energy	National Level		Virtual & In person	MoE, EAC, MISTI, MEF, Environmental and climate	MME	Preparation of ESMF

Sub-Component	Level	Target Areas	Mode of Consultation	Target Participants	Responsible Agencies	Timing
Efficiency Credit Line			Virtual & In person	advocacy organizations, Policy banks, PFIs, Industrial enterprises and identified in Table 3-1, Table 3-2, and Table 3-3		Preparation of ESMF particularly for SC-2.1
	Provincial Level	Target Provinces	Virtual & In person	Provincial Departments of MoE, MISTI, Policy banks, PFIs, Industrial enterprises, and other interested parties		Preparation of ESMS

4.2. Stakeholder Engagement during Project Implementation

During the implementation of the project, the consultations for the site-specific E&S documents such as ESIA, site specific (SS-ESMP), RAP, etc. will be conducted to the project nearby communities and relevant stakeholders for receiving opinions, and concerns. The consultations will be conducted in native languages/dialects of the affected/nearby populations. All documents on risk management including site-specific documents such as Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Environmental and Social Management System (ESMS) for FIs, and regular risk monitoring reports, will be disseminated on EDC/MME websites as well as websites of policy bank, SME, and EDC office at relevant site after obtaining clearance by the Bank for disclosure. The E&S documents shall be disclosed at least 14 days prior to the consultation meetings. The obtained opinions and concerns should be addressed as much as possible in the revised E&S documents.

Moreover, the additional consultation and engagement can be arranged as necessary during the project implementation, such as an Industrial Stakeholder Forum to be conducted annually with participated industries and interested industries, technical staff, and worker representatives to discuss progress under the energy efficiency component, as well as labor-related concerns.

In addition, in order to ensure the Civic and Citizen Engagement (CCE) during the implementation, the engagement with beneficiaries of the project along the project cycle will be integrated in the stakeholder engagement program.

4.3. Methods, Tools and Techniques for Further Stakeholder Engagement

The Stakeholder Engagement Plan below outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders.

Table 4-3 Methods, Tools, and Techniques for Further Stakeholder Engagement

Project stage	Target Stakeholders	Topic of Consultation / Message	Method used	Responsibilities/ Relevant	Frequency/Timeline
Preparation	Government Agencies	Project Introduction and Project alignment with national energy policies	<ul style="list-style-type: none"> Formal meeting 	MME and EDC	Initial consultation during design stage; follow-ups semiannual.
Preparation	Private Sectors & Independent Power Producers including factory owners, technicians	Investment opportunities Renewable energy market development	<ul style="list-style-type: none"> Workshop Surveys Industrial stakeholder forum 	MME and EDC	At appraisal and then annual if necessary
Preparation and Implementation	Indigenous Communities & Landowners	Land acquisition impacts Cultural consultation and compensation	<ul style="list-style-type: none"> Community Consultation Focus Group Meeting Site Visits KII FPIC (Use of trusted intermediaries)	MME, EDC/ The Ministry of Land Management, Urban Planning and Construction (MLMUPC), and local authorities	Before land acquisition and periodically thereafter
Implementation	Industrial Enterprises	Loan opportunities for energy efficiency equipment Job displacement Retraining & reskilling opportunities	<ul style="list-style-type: none"> Community Consultation Focus Group Meeting Workshop 	MME, and EDC/ Ministry of labour and vocational training	Semi-annually
Implementation	Material Suppliers, private investors for EV charging stations, AMI	Market opportunities and support for EVs infrastructure	<ul style="list-style-type: none"> Industry Meetings Technical Workshops 	MME and EDC/ Ministry of Economy and Finance	Bi-annually or as standards are updated

Project stage	Target Stakeholders	Topic of Consultation / Message	Method used	Responsibilities/ Relevant	Frequency/Timeline
	suppliers, interested or beneficiaries for distribution network expansion component	and AMI installation Charging infrastructure updates Regulatory Planning	<ul style="list-style-type: none"> • Site Visits 		
Preparation and Implementation	Local Communities near Construction Sites including project affected communities, beneficiaries, etc.	Construction Schedule Health and Safety Risks Temporary Disturbances	<ul style="list-style-type: none"> • Community Consultation Meetings • Focus Group Meeting • KII • Leaflets • Radio • Site signage 	EDC / Contractors	<p>Before Construction works are planned and started.</p> <p>As required during the construction period.</p>
Implementation and Monitoring	CSOs and CBOs in Project Areas	Project updates Social monitoring	<ul style="list-style-type: none"> • Public Briefings • Monitoring Visits 	EDC / MME/PMUs	Semiannually

4.4. Guide for Engagement Process

1. **Community Consultations:** Hold meetings in local areas with key community leaders or representatives to facilitate discussions and gather feedback from vulnerable groups. This can include leaders from indigenous communities, rural areas, and women's groups. It allows for direct, face-to-face communication in a familiar setting, making it easier for people to engage and express their concerns. Use locally relevant method such as announcement via community notice boards, loudspeaker in villages, and letters to local leaders, and visual aids such as maps and photos to help explain the project clearly. Schedule consultations after farming hours so that both husbands and wives can attend, as requested by multiple villages (e.g., Koh Phnov, Koh Hib). Provide bilingual communication (Khmer–Lao) for Lao-speaking elders in mixed-ethnic villages. In areas with spiritual sites or Neak Ta traditions (e.g., Kratie, Stung Treng), consult elders and spirit mediums before discussing construction works that may disturb ponds, large trees, or riverbank areas.
2. **Surveys and Focus Groups:** Conduct surveys and focus group discussions to gather in-depth information on the needs, concerns, and opinions of vulnerable groups. Surveys can be conducted door-to-door, and FGDs can be held in smaller, more intimate settings. Use visual tools (photos, diagrams) for low-literacy older residents who prefer oral explanations.
3. **Gender-Segregated Consultations:** Hold separate consultations for men and women to ensure women, especially in male-dominated societies, can voice their concerns and provide input without the influence of male participation. Hold separate FGDs for women to allow safe and confidential

discussion of concerns such as GBV, labor behavior, and nighttime safety. Appoint female community focal persons who can support women in raising sensitive issues, including harassment or labor-related misconduct if possible for Grievance mechanism.

4. **Site visits:** provide an opportunity for stakeholders to meet and interact with the project-affected, interested, and vulnerable parties particularly for communities and landowners affected by land acquisition. These visits allow affected parties to directly view the project impact area, discuss their concerns on-site, and receive information regarding compensation and relocation processes. This could also help to build relationships and trust and to promote collaboration and communication. Community members requested advance notice before large vehicle deliveries and construction work to avoid safety risks and accidental disturbance of farmland or riverbank areas. In floating or riverine villages, ensure safe boat transport (e.g., life jackets, safe loading), as requested due to past drowning incidents.

The following measures will be taken in order to remove obstacles to full and enabling participation / access to information:

1. **Offer Transportation Support:** Provide transportation assistance for rural and low-income households to attend consultations, meetings, or workshops.
2. **Culturally Sensitive Engagement:** Develop and implement culturally sensitive consultation methods, including the use of indigenous languages, local traditions, and community-specific customs. Involve trusted intermediaries such as indigenous NGOs or Ministry of Rural Development field staff from those communities while engaging with indigenous communities. Hold the village/community meeting in culturally appropriate venues (e.g., under village ceremonial huts) and respect customary protocols (e.g., opening prayers or elder involvement). Respect Cham Muslim norms by avoiding pork/alcohol consumption near their homes, avoiding construction during prayer times, and adjusting work schedules during Ramadan. In Lao-Khmer mixed villages, ensure interpretation support and allow elders to speak in Lao for comfort. Where Neak Ta/spirit beliefs are present, conduct pre-construction consultations with elders and mediums, and avoid disturbing spirit-inhabited trees, ponds, or riverside areas unless community-approved.
3. **Simplified Communication and Outreach:** Use clear and simple language in all communications, avoiding technical jargon. Additionally, offer materials in local languages and dialects to reach a broader audience. Use loudspeaker announcements, and oral briefings for elderly residents who prefer spoken communication over written notices.
4. **Create Safe Spaces for Participation:** Establish gender-segregated consultations, especially for women and female-headed households, to provide a safe and supportive environment for them to express their views without fear of judgment or exclusion. Conduct separate consultations where appropriate (e.g., women-only groups, indigenous language sessions with interpreters) to ensure inclusive participation. Hold separate sessions for workers—particularly in industrial zones—coordinated through unions or HR, to ensure they can share feedback freely without employer influence.
5. **Legal Support for Land Acquisition and Compensation**
Provide legal assistance and advice to indigenous communities and landowners regarding land acquisition processes and compensation schemes. And to ensure that vulnerable groups, particularly indigenous people, are fully informed of their legal rights and receive fair compensation during land acquisition procedures.
6. **Engagement Through Local Organizations:** Collaborate with local organizations, such as women's groups, and indigenous associations, to facilitate the engagement of hard-to-reach groups. May establish formal stakeholder committees, including Resettlement Committees at district level, Community Liaison Committees in impacted villages, and Industrial Stakeholder Forums to address specific concerns, respectively. Coordinate with environmental NGOs where relevant.

7. **Regular Monitoring and Feedback Mechanisms:** Establish regular feedback channels, such as community meetings, surveys, or phone consultations, to gather ongoing input from vulnerable groups throughout the project lifecycle. Use media tools like local radio broadcasts, social media (Facebook), and SMS notifications to maintain communication and provide timely updates. Install grievance/feedback boxes in commune offices and village halls to allow anonymous submissions, especially for low-literacy and shy villagers. Provide a project hotline and, where possible, a Lao-speaking liaison for elders.
8. **Site Signage:** Place site signage at construction sites with project information and grievance contact details in Khmer and local languages where relevant. Include pictorial safety warnings (e.g., electrical shock, excavation hazards) for low-literacy communities.
9. **Information Disclosure:** Disclose information not only through printed materials but also orally in community meetings, especially where literacy is low. Place the physical copies of key documents (e.g., SEP, ESMP, RAP) in Khmer at commune offices and district halls, while electronic versions will be posted on EDC and World Bank websites. Easy-to-understand summaries, such as illustrated brochures (e.g., “Your Village is Getting Electricity – What to Expect”- a 2-page project information booklet explaining the timeline and who to contact), will be prepared and distributed to.
10. **Adaptations for Health or Other Restrictions:** In case of restrictions such as COVID-19 outbreaks, adapt engagement approaches to remote methods including phone interviews or small, physically distanced meetings, while prioritizing in-person meetings whenever safe and possible.

Moreover, whenever implementation of engagement the project will seek the views of the identified vulnerable or disadvantaged groups.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT

5.1. Implementation Arrangements and Resources

The implementing agencies, Ministry of Mines and Energy (MME) and Electricité du Cambodge (EDC), will be in charge of stakeholder engagement activities. The entities responsible for carrying out stakeholder engagement activities are Project Management Unit (PMU) under each implementing agency. The overall responsibility for SEP implementation lies with the Project Management Unit (PMU) Directors from MME and EDC, respectively.

The project's stakeholder engagement implementation arrangements for particular/sensitive topics¹ are as follows:

- EDC's Resettlement Committees will oversee land acquisition and compensation processes in case of the engagement related to land acquisition and engagement of affected households will be involved through the process.
- For adversely impacted villages under the project, the commune council will meet regularly (e.g., monthly) to monitor construction activities, manage grievances, and maintain trust. In addition, monthly community meetings will be organized in villages with active construction, as needed should any issues arise.

The stakeholder engagement activities will be documented through meeting minutes, attendance records, Q&A logs from consultations, summaries of feedback from surveys and focus groups, documentation of committee meetings, records of public announcements (e.g., via loudspeakers, letters to local leaders), and photographic or audio/video evidence of participation especially in indigenous or vulnerable communities.

The budget estimate for the preparing and implementing SEP is 110,00 USD for the whole project implementation through project cycle. The budget breakdown can be found in Annex 2.

¹ Integrate provisions for the mobilization of technical expertise for safe consultations with vulnerable groups, and/or on sensitive topics, as and when needed.

6. GRIEVANCE REDRESS MECHANISM (GRM)

A Grievance Redress Mechanism (GRM) is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner.

6.1. Objective of GRM

The objective of the GM is to receive, evaluate, and address grievances in a timely and transparent manner. The mechanism applies to all components and sub-projects of CSET and is accessible to all stakeholders, including project-affected persons, workers, contractors, financial intermediaries, and community members.

The GRM covers issues related to:

- Environmental impacts (e.g., dust, noise, pollution)
- Social impacts (e.g., resettlement, access restrictions)
- Corruption, fraud, or mismanagement of project funds
- Exclusion or discrimination in project benefits
- Gender-based violence (GBV), including sexual exploitation, abuse, and harassment
- Unfair procurement or employment practices
- Labor conditions and worker safety
- Community health and safety
- Land acquisition and compensation
- Construction damage or delays
- Utility access disruptions
- Impact on tangible and intangible cultural properties
- Any other community concerns related to project implementation

6.2. Summary Of National Legislation Related to Grievance and Complaint

The Royal Government of Cambodia (RGC) has established a series of laws and sub-decrees that form the national legal framework for grievance redress and dispute resolution. These legal instruments define the rights of complainants and the responsibilities of relevant government bodies in responding to grievances. The CSET Project's GRM operates in alignment with these laws to ensure coherence with national procedures and principles of administrative justice. Key legal references include:

- Law on Expropriation (26 February 2010): Governs land acquisition, compensation, and appeal rights.
- Labor Law (13 March 1997; amended 20 July 2007 and 26 June 2018): Defines labor rights and grievance procedures related to employment and occupational safety.
- Law on the Prevention of Domestic Violence and Protection of Victims (24 October 2005): Guides responses to gender-based violence and protection mechanisms for victims.
- Sub-decree No. 22 ANK/BK (2018): Establishes Standard Operating Procedures (SOPs) for Land Acquisition and Involuntary Resettlement for Externally Financed Projects; includes Guidelines for Grievance Redress Mechanism (Appendix 8).
- Law on Administrative Management of Capital, Provinces, Municipalities, Districts and Khans (22 May 2008): Section 6 outlines the responsibilities of local administrations in resolving community conflicts.
- Sub-decree No. 22 (25 March 2002): Provides for the decentralization of powers to commune councils, including responsibilities for conciliating civil disputes (Article 61).
- Sub-decree No. 47 ANK.BK (31 May 2002): Defines the roles of the Cadastral Commission, including dispute resolution over land rights at the district/khan level (Chapter 4).

6.3. Roles and Responsibilities of the Organizations Involved in GRM

The CSET GRM involves a multi-tier structure comprising various actors at the community, institutional, and national levels. Each entity has a defined role in receiving, addressing, resolving, and escalating grievances in accordance with the principles of transparency, timeliness, and accessibility. EDC and MME will establish separate grievance redress mechanisms, tailored to the specific project activities and institutional context of the respective organizations. The tables below summarize the key responsibilities and resolution timelines for all entities involved in the GM process.

Table 6-1 Roles and Responsibilities of Organizations Involved in EDC’s GRM

Stage	Entity	Roles and Responsibilities
First Stage	Village/Commune Chief / Commune Council	<ul style="list-style-type: none"> Acts as the first point of contact for community members and affected persons. Receives complaints verbally or in writing, issues receipt, documents and informs to SEPRO
	Contractor	<ul style="list-style-type: none"> Maintains a contractor-level GRM at each project site. Receives and logs complaints from workers, attempts to resolve issues through negotiation, and forwards unresolved complaints to SEPRO. Reports all worker grievance cases and resolutions to SEPRO as part of regular reporting.
	PMU (SEPRO -Social, Environment and Public Relations Office)	<ul style="list-style-type: none"> Receives complaints referred from village/commune chief/ commune councils and contractors. Responsible for resolving issues through negotiation at the intermediate level. If unsuccessful, forwards cases to the District Office and report to PMU (EDC). Ensures proper documentation, safeguards compliance, and reporting them to the PMU (EDC).
Second Stage	Project Management Unit (EDC’s PMU)	<ul style="list-style-type: none"> Provides strategic oversight and coordination for the entire project GRM system. PMU of EDC is supported by project of environment and resettlement and land acquisition (PER&L) through SEPRO. Escalates unresolved or systemic issues to the Project Steering Committee and includes sensitive cases in reports to the World Bank.
	PMU (SEPRO)	<ul style="list-style-type: none"> Representatives from SEPRO’s Land acquisition compensation and project data management unit coordinates grievance resolution efforts across stakeholders and ensures compliance with project GRM protocols as part of PMU of EDC. Monitors resolution processes, consolidates grievance data, and ensure enforcement of GRC decisions. Supports resolution at various stages, maintains grievance records, and facilitates communication with the PMU, SEPRO and Provincial GRC.
	District Office	<ul style="list-style-type: none"> Receives complaints escalated from SEPRO at 1st stage of GRM. Facilitates negotiation and documentation among stakeholders. If unresolved, refers complaints to the Provincial GRC. Serves as a formal escalation layer in the admin.
Third Stage	Provincial Grievance Redress Committee (GRC)	<ul style="list-style-type: none"> Composed of Deputy Governor as a Chairperson, other members include representative from different ministries, different communes and villages chiefs involved. Resolves complex complaints, especially related to land, compensation, or construction nuisances escalated from 2nd stage of GRM. Issues written decisions and communicates outcomes to complainants.
Fourth Stage	Supreme Court	

Table 6-1 Roles and Responsibilities of Organizations Involved in MME’s GRM

Stage	Entity	Roles and Responsibilities
First Stage	Policy Bank (SME Bank) PFI (FTB)	<ul style="list-style-type: none"> Establish internal mechanisms or focal points for addressing grievances related to loan eligibility, disbursement, and financing. Complaints unresolved at 1st stage are referred to the PMU (MME). The policy bank is expected to ensure that their systems align with the broader project GRM principles.
Second Stage	Project Management Unit (MME's PMU)	<ul style="list-style-type: none"> Provides strategic oversight and coordination for the entire project GRM system. Responsible for resolving issues through negotiation at the intermediate level. If unsuccessful, forwards cases to the Provincial Court. E&S focal point from PMU monitors resolution processes, consolidates grievance data from the policy bank. Escalates unresolved or systemic issues to the Project Steering Committee and includes sensitive cases in reports to the World Bank.
Third Stage	Provincial Court	<ul style="list-style-type: none"> Resolves the complaints, escalated from 2nd stage of GRM according to the national legislation.

In addition, the Project Steering Committee will serve as the final internal level of grievance review and guide each PMU to address unresolved or high-risk complaints that could impact project legitimacy or safeguard compliance. The committee may escalate to the national court system or engage the World Bank for further guidance on complex or sensitive issues. The committee will ensure alignment with Cambodian law and World Bank ESF.

6.4. Description of Grievance Redress Mechanism (GRM)

The Grievance Redress Mechanism (GRM) is established to provide project-affected people (PAPs) and stakeholders with a transparent, accessible, and time-bound process to raise concerns or complaints related to the environmental and social performance of the CSET Project. The GRM ensures that grievances are received, recorded, assessed, and resolved promptly and effectively without fear of retribution.

6.4.1 EDC's GRM

The GRM follows EDC's existing structure, which enables affected people to submit complaints through the Commune Council, Social, Environment and Public Relations Office (SEPRO), District Office, and Provincial Grievance Redress Committees, before referring unresolved cases to the judicial system if necessary. The grievance procedure includes six stages, as illustrated in Figure 6-1.

Stage 1 – PMU (SEPRO)

- Affected persons or households may submit written or verbal complaints to the PMU (SEPRO) via the Village Leader or Commune Chief, through phone, letter, email, or in-person visit.
- Grievance cases related to land acquisition, the environment issues will be handled by PMU (SEPRO), while other issues (including workers, Indigenous people, agriculture, or others) will be handled by the PMO of the PMU.
- The Village leader /Commune Chief must register the complaint and provide immediate written acknowledgment to the complainant, copying SEPRO.
- SEPRO has 15 days to review and negotiate a solution with the complainant. If unresolved or if the complainant is unsatisfied, the case is elevated to the District Office and report to PMU (EDC).

Stage 2 – District Office

- The District office has 15 days to investigate and mediate the case through various approaches depending on the type of complaints. PMU (SEPRO) will coordinate with district office along the resolving process.
- If the issue cannot be resolved satisfactorily at this level, the complaint is referred to the Provincial GRC along with all supporting documents.

Stage 3 – Provincial Grievance Redress Committee

- The Provincial GRC is Deputy Governor as a Chairperson, other members include representative from different ministries, different communes and villages chiefs involved. Also, the representatives from SEPRO, and other stakeholders such as the Project Implementation Consultant (PIC) will be involved.
- The Committee must meet with the complainant within 15 days of receiving the case and make a written decision within 30 days.
- Copies of the decision are shared with PMU (SEPRO) and the complainant.
- If the complainant does not receive a decision or remains unsatisfied, they may take the case to the Provincial Court.

Stage 4 – Provincial Court

- The Provincial Court reviews the case and issues a written ruling, with copies provided to EDC and the complainant.
- If either party disagrees with the decision, the case may be appealed to the Higher Level Court which will serve as the final appellate body and its judgment will be final and binding on all parties.

Grievance redress mechanism and information should be well-publicized in the local language (Khmer, via posters or facebook). All grievances will be recorded in a Grievance Register maintained by PMU (SEPRO), with support from the PMO for grievances related to workers, Indigenous Peoples, agriculture, or other non-environmental issues. The PMU (SEPRO) will involve and assist the process of grievance resolution at all stage. The Register will capture key details including the date of receipt, complainant information (if provided), a description of the issue, actions taken, responsible persons or units, and the resolution status. Anonymous complaints will be accepted and handled with equal seriousness, and complainants will not incur any costs for submitting grievances. To ensure transparency and accountability, SEPRO will compile and report regular summaries of grievances received, resolved, and pending as part of EDC's quarterly environmental and social monitoring reports.

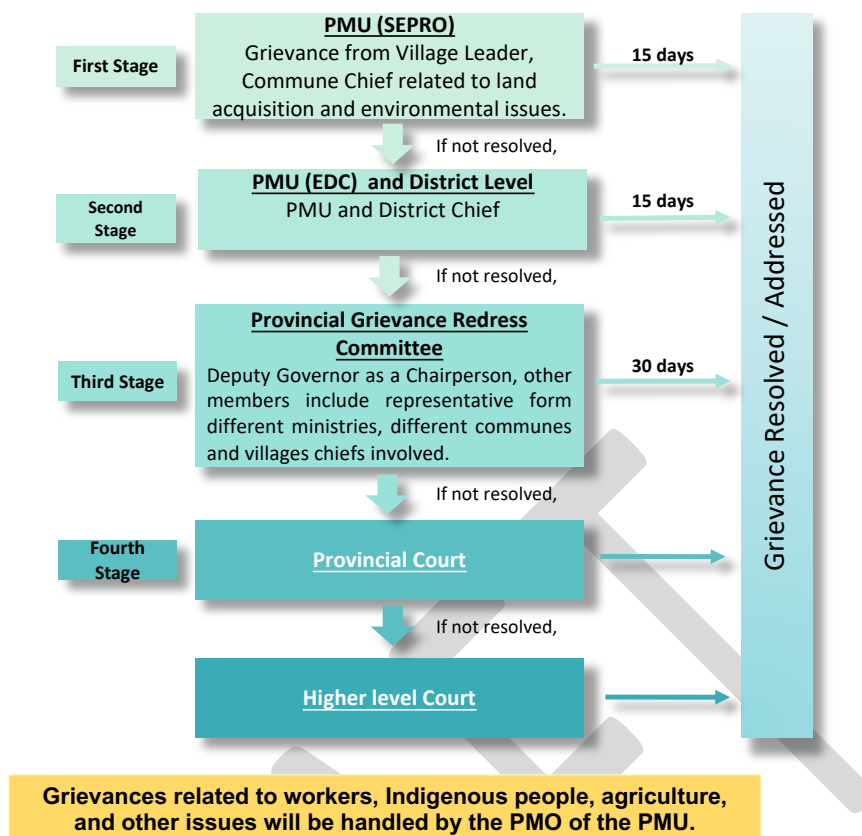


Figure 6-1 GRM Procedures for EDC

6.4.2 MME's GRM

The grievance process for Component 2 follows a three-stage mechanism reflecting the roles of the Policy Bank/Participating Financial Institutions (PFI) and the MME PMU. Complaints can be submitted verbally or in writing, and all grievances will be handled confidentially and without cost to complainants. The grievance procedure for MME, as illustrated in **Error! Reference source not found.**,

Stage 1 – Policy Bank/PFI 's GRM (SEM Bank, FTB)

- Affected industrial enterprises or individuals may submit grievances to the internal grievance mechanism of the Policy Bank or PFI through phone, email, letter, or in-person visit.
- The Policy Bank/PFI must register the complaint and provide immediate written acknowledgment to the complainant.
- The institution has 15 days to review, investigate, and attempt to negotiate a mutually acceptable solution.
- If the complaint is not resolved, or if the complainant is not satisfied with the proposed resolution, the case is elevated to PMU of MME.

Stage 2 – PMU of MME

- PMU (MME) reviews the grievance and seeks resolution through consultation and negotiation within 15 days.
- If the issue remains unresolved after this period, PMU (MME) forwards the grievance to the Supreme Court.
- PMU (MME) also documents and escalates systemic or sensitive issues to the Project Steering Committee and includes them in regular reporting to the World Bank, in accordance with the ESCP.

Stage 3 – Supreme Court

- The Supreme Court reviews the case and issues a written ruling, with copies provided to MME and the complainant.
- If either party disagrees with the decision, the case may be appealed to the Higher Level Court which will serve as the final appellate body and its judgment will be final and binding on all parties.

All grievances will be recorded in a Grievance Register maintained by E&S focal point of the PMU capturing key details such as the date of receipt, name of the complainant (if provided), description of the issue, actions taken, persons responsible, and the resolution status. Anonymous complaints will be accepted and treated with equal seriousness, and complainants will not incur any costs in submitting their concerns. To ensure transparency and accountability, E&S focal point of the PMU will compile and report regular summaries of grievances received, resolved, and pending as part of the quarterly environmental and social monitoring reports.

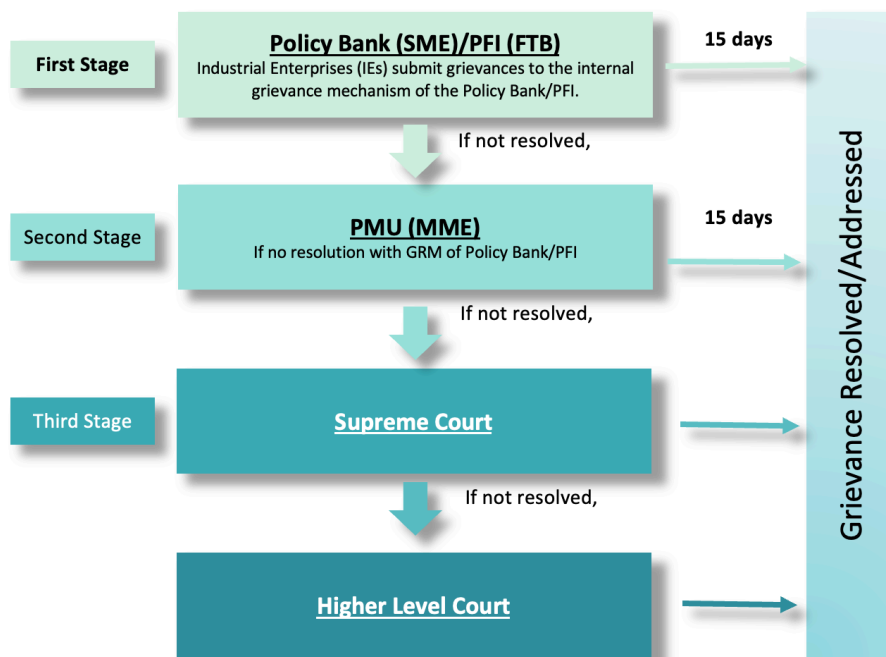


Figure 6-2 GRM Procedures for MME

The GRM of CSET project will be widely disseminated to stakeholders through commune offices, project information boards, and public consultations, as well as local radio, printed leaflets, and social media platforms through project cycle. Information about the GRM will be provided in Khmer and, where necessary, translated into local or indigenous languages to ensure accessibility for all affected communities.

Moreover, communities and individuals who believe that they are adversely affected by a project supported by the World Bank may submit complaints to existing project-level grievance mechanisms or the Bank’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the Bank’s independent Accountability Mechanism (AM). The AM houses the Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures, and the Dispute Resolution Service, which provides communities and borrowers with the opportunity to address complaints through dispute resolution. Complaints may be submitted to the AM at any time after concerns have been brought directly to the attention of Bank Management and

after Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's Grievance Redress Service (GRS), visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the Bank's Accountability Mechanism, visit <https://accountability.worldbank.org>.

6.4.1. Redress Procedure for Complaints related to SEA/SH

Under the project, the GRM for SEA/SH mainly serves to: (i) refer complainants to a local GBV service provider; and (ii) record resolution of the complaint. In line with the above, the following principles apply so as to recognize SEA/SH victims as principal decision makers in their own care, and treat them with agency, dignity and respect for their needs and wishes:

- Multiple channels are in place for easy access and lodging complaints.
- SEA/SH survivors will be referred to a local GBV service provider for immediate support if they make a complaint directly to district offices or PMU.
- The confidentiality of survivors is protected. GM operator (at SEPRO and local GBV service providers) will keep confidential for SEA/SH allegation report.
- No identifiable information on the survivor shall be collected and stored in Project Grievance Logbook.
- Costs of operating SEA/SH GRM will be covered by the project.

It is noted that under the project, GBV service provider will be engaged for subprojects that are rated "Moderate", or higher – based on SEA/SH risk assessment as part of site-specific ESMP.

The following channels can be used to submit a grievance related to SEA/SH:

+ **Channel 1** – Affected Person (AP) who believe the SEA/SH incidence is related to project workers can follow steps outlined in Table 6-2(above) to lodge a SEA/SH complaint.

+ **Channel 2** – Alternatively, AP can lodge their complaint, verbally or in writing, to the GRM's Focal Point within the SEPRO.

+ **Channel 3** – If AP wants to bring the case to the Court of Law, AP can follow steps below for prosecution. Prosecution related to SEA/SH is administered under the Criminal Code and the Code of Criminal Procedure and is as follows:

- **Step 1 – Judicial Police.** SEA/SH victim or a representative can submit their grievance to a local Judicial Police (JP) Officer. JPs include a) Commune/ Sangkat Chief, b) Commune/ Sangkat/ District/ Provincial/ National Police, and c) District/ Provincial/ National Military Police. The JP is responsible for receiving, recording complaints, and may conduct preliminary investigations to identify and arrest the perpetrator. The JP will also collect evidence to support the prosecutors. If the SEA/SH happens at home and/or falls under the domain of domestic violence (as per Law on the Prevention of Domestic Violence and Protection of Victims), the SEA/SH survivor may seek support from a local qualified Judiciary Police Officer (appointed by the Ministry of Women's Affairs) who can act as a complaining party on behalf of the SEA/SH survivor.
- **Step 2 – Prosecutor.** Upon receiving the completed written record from the JP, the prosecutor can decide if the prosecutor will hold a file without processing it further or conduct proceedings against the perpetrator. The prosecutor may bring the case to the Court of Law and present the evidence in Court hearings.
- **Step 3 – Investigation by Judge.** During this step, the investigating Judge will conduct interrogation of the person charged and perform other required investigation procedures.
- **Step 4 – Hearing.** After issuing an order of indictment, the investigating Judge will submit the case to the trial court president who shall arrange a date for the trial. The decision of the Court on SEA/SH resolution is final.

7. MONITORING AND REPORTING

7.1. SEP Monitoring

Implementation of the Stakeholder Engagement Plan will be the responsibility of the PMUs. They will guide the process of stakeholder engagement throughout the preparation and implementation of the CSET.

The PMUs with the support of qualified Environmental and Social consultants, will be responsible for:

- Leading, or supervising, consultations and the disclosure of information, as per the SEP;
- Reporting on grievance resolution, as per the SEP;
- Review monthly monitoring reports provided by contractors and/or consultants;
- Quarterly SEP reporting to the Project Director.

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

SEP reporting will include the following:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Management Framework, Resettlement Policy Framework, Indigenous Peoples Planning Framework, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons.
- (iii) Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.

Stakeholder engagement should be periodically evaluated by the project in line with overall monitoring and other relevant project documents. The project will strive to include project stakeholders in monitoring activities.

The EDC and MME will prepare beneficiary feedback surveys conducted at midline and endline stages of implementation. The contribution of project beneficiaries who report that their feedback during the implementation of the project will be recorded and it is expected to reach the 50% positive feedback.

7.2. Reporting Back to Stakeholder Groups

The SEP will be periodically revised and updated as necessary during project implementation. *Quarterly* summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project such as PMU.

Quarterly reports will present a mechanism for evaluating the volume and nature of complaints and information requests, as well as the project's effectiveness in addressing them promptly and efficiently. Updates on public engagement activities conducted throughout the year may be shared with stakeholders through various channels, including field visits, one-on-one interviews or meetings, group discussions, and consultation workshops.

The specific method of reporting back to stakeholders will depend on the stakeholder itself. For instance, workshops and meetings for national-level stakeholder; one-on-one interviews or meetings, and group discussions for local level stakeholders, field visits/ongoing consultations for Indigenous Peoples will be considered to inform how project responds to their feedbacks from the past public engagement activities.

The project will employ a “You Said, We Did” approach to show how stakeholder feedback influenced project decisions. For example, if villagers request pole relocation to field boundaries, project engineers may revise the design and present updated maps during follow-up meetings. If women prefer information sharing at pagoda gatherings on holy days, the communication plan will be adapted accordingly. In IP communities, the project may reschedule works to respect spiritual rituals requested by elders. These responsive actions will be documented and publicly reported to build trust and strengthen participation.

Reports will be shared through context-appropriate channels such as community bulletin boards (e.g., quarterly Khmer-language newsletters), local radio or TV segments, and at annual stakeholder review workshops where representatives from various communities and NGOs are invited to discuss overall project progress.

This reporting back to the stakeholders will be arranged semi-annually based on the results of quarterly summaries particularly the outstanding complaints and resolving mechanism.

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LIST OF ANNEXES

- Annex 1. Example of Invitation for Online and/or In-Person Consultations
- Annex 2. Records of Consultation Meeting
- Annex 3. The Grievance Register
- Annex 4. SEP Budget

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ANNEX 1: EXAMPLE OF INVITATION FOR VIRTUAL AND/OR IN-PERSON CONSULTATIONS

Included below is a sample invitation to one of the series of consultations organized through a Webex meetings platform in xx, xx, 2026.

Subject: Invitation to Stakeholder Consultation Meeting

Dear Sir/Madam,

The Ministry of Mines and Energy (MME) jointly with the Electricité du Cambodge (EDC) is planning to implement the “Cambodia Sustainable Energy Transition (CSET) Project”. The project will be financed by the World Bank and both MME and EDC will be implementing agencies. The Project Objective of the CSET is “to support Cambodia’s energy transition by strengthening power grid infrastructure and improving industrial energy efficiency”. The project will implement across Kingdom of Cambodia focusing on Phnom Penh, Kandal, Stung Treng, Takeo, Kratie, Pursat, and Prey Veng Provinces.

The environmental and social risk management documents have been prepared for the CSET to ensure the requirements of World Bank’s environmental and social framework (ESF) and Cambodia legislation are fulfilled during implementation of project activities. FAQs about the CSET, drafts of the Environmental and Social Management Framework, Social Assessment, Environmental and Social Commitment Plan, and Stakeholder Engagement Plan in English and translations of the Executive Summaries in Khmer Language have been disclosed for public consultations on xx, xx, 2026 on the website of MME and EDC.

The MME and EDC will organize public consultations on these drafts environmental and social risk management documents as per the following schedule, and you are cordially invited to participate in the meeting. The consultations will be carried out by both in-person and virtual means. The agenda is attached for your perusal. **Kindly note that the consultations will be conducted only in Khmer Language.**

Date and time	Province	Mean of consultation
xx, xx, 2026 9:00 am – 12:00 noon		In person – Venue Online – the Link below: Click the link below or add the meeting number and password in Cisco Webex.

Attached the instruction for downloading and using Cisco Webex application. For those who are new to the Cisco Webex application, click the below link for testing Webex on xx, xxx, 2026. If you encounter any issues with using Cisco Webex app., please reach out to (xxx email); (xxx phone).

Please confirm your participation by providing your **name, organization, and phone number**.

We look forward to your contribution.

Best wishes,

Ministry of Mines and Energy

ANNEX 2: RECORD OF CONSULTATION MEETING

The minutes of each consultation meeting should be recorded with the following form:

***Please add Title of Consultation Meeting indicating Location and Date**

Stakeholder/Participants (Group or Individual)	Summary of Feedback	Response of PMUs	Follow-up Action /Next Steps

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ANNEX 3: THE GRIEVANCE REGISTER

The following table will need to be prepared and completed by the GRM designated officers from both PMU of MME and PMU of EDC responsible for maintaining the register, when a complaint comes in and at each stage of resolution or rejection. To understand the use of the register, and each of its columns, the following is the definition of each column:

- **Grievance Registration No.:** this column will be a code reference, which can be used as an identifier and marked on all correspondence and consultations used in the resolution of the complaint.
- **Date:** when the grievance was first submitted.
- **Name:** Provide name of Complainant. If they choose not to provide name, this is also acceptable, but identify as such.
- **Address:** of complainant
- **Contact No.:** Phone number of the complainant so that further discussions can be made, and resolution is satisfactory verified
- **Gender** – is the complainant male or female
- **Description of Grievance** – provide a brief description of the complaint
- **Name of person who took grievance:** who took/accepted the grievance from the complainant.
- **Type of grievance** - category Environmental Pollution; Social-Resettlement; other etc.
- **Directed to?** – this will be changing but starting with the grievance being given to a GRM designated officers responsible as the start of resolution; this will change if the complaint needs decision from Commune level, PMU levels, or other levels of Grievance, legal system or other agency.
- **Status of resolution** – resolved or not – also provide date in this column.
- **If resolved, state resolution** - When a resolution is agreed with Complainant, a brief description on what the resolution activity is, signed off by the complainant (no sign off in the case of anonymous complaints).

The PMUs' designated officers will keep a folder in the office in which all grievances and subsequent materials should be filed. A summary of all project grievances, with their status, will be included in regular E&S reports submitted by both MME and EDC to the World Bank. An audit of these complaints shall take place at the time of each project progress monitoring reporting to the World Bank.

It is important that the MME and EDC representatives at PMU level follows up on each complaint to make sure it is being dealt with in accordance within the specified timeframe of the Grievance Redress Mechanism and ensure the complainant is notified regularly of the progress of complaints resolution.

ANNEX 4: SEP BUDGET

Budget categories	Quantity	Unit costs (USD)	Times/ Years	Total costs	Remarks
1. Estimated Staff salaries* and related expenses					
Ministry of Mines and Energy (MME)					
Consultants					Included in the budget for ESMF implementation
Electricité du Cambodge (EDC)					
Consultants					Included in the budget for ESMF implementation
2. Consultations/ Participatory Planning, Decision-Making Meetings					
Ministry of Mines and Energy (MME)					
Public Consultations (ESMF) for Component 2 (National Level)	2	3000		6000	SC 2.1
Public Consultations (ESMF) for Component 2 (Provincial Level)	1	3000		3000	SC 2.1
Public Consultation for ESMS	2	3000		6000	SC 2.1
Electricité du Cambodge (EDC)					
Public Consultations (ESMF) for Component 1 (National Level)	2	3000		6000	SC 1.1
Public Consultations (ESMF) for Component 1 (Provincial Level)	1	3000		3000	SC 1.1 SC 1.3
Public Consultations (ESMP) for Component 1 (District/Commune Level)	2	3000		6000	SC 1.1 SC 1.2 SC 1.3
3. Trainings and Implementation of SEP and GRM					
Ministry of Mines and Energy (MME)					
Training on SEP and GRM for PMU and Policy Banks					Included in the budget for ESMF implementation
Training on Gender-Based Violence (GBV) for PMU and Policy Banks					Included in the budget for ESMF implementation
GRM Set up/Investigation/Visits				25000	
Electricité du Cambodge (EDC)					
Training on SEP and GRM for PMU, SEPRO, and Contractors, REE					Included in the budget for ESMF implementation

Budget categories	Quantity	Unit costs (USD)	Times/ Years	Total costs	Remarks
<i>Training on Gender-Based Violence (GBV) for PMU, SEPRO, and Contractors, REE</i>					<i>Included in the budget for ESMF implementation</i>
<i>GRM Set up/Investigation/Visits</i>				25000	
4. Other expenses					
Ministry of Mines and Energy (MME)					
<i>Cost for SEA/SH GRM</i>				15000	
Electricité du Cambodge (EDC)					
<i>Cost for SEA/SH GRM</i>				15000	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				110,000	

*Note: Salary costs can be indicative. The budget for each implementing agency is indicated in the budget for ESMF implementation.

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Electricité du Cambodge (EDC) invites any comments or suggestions from any interested stakeholders, to send the feedback from the following contacts :

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-Email : vuthychea88@gmail.com

-Phone : 012580659

-Office Address : Social Environmental and Public Relation Office (Sepro) of Cooperation Planning and Project of EDC.

-EDC Headquarters' address: #2, St. Preah Yukunthor, Sangkat Wat Phnom, Khan Daun Penh, Phnom Penh.

-Period of Disclosure : 19 Jan -03 Feb 2026

Printed copies of the ESMF and associated documents are available upon request at the Office of MME/EDC.