

Draft Social Compliance Audit Report

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Indonesia: Karian Serpong Water Supply Project

Prepared by PT ERM Indonesia for the Asian Development Bank.

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Environment and Social Performance Evaluation

Karian-Serpong Regional Water Supply Project

28 March 2023

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Environment and Social Performance Evaluation

Karian-Serpong Regional Water Supply Project

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APPENDIX C

**SOCIAL COMPLIANCE AGAINST ADB SAFEGUARD
POLICY STATEMENT**

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C.1. Project Overview

C.1.1. Land Acquisition and Involuntary Resettlement

The land for Water Treatment Plant (WTP) as part of project development is located at Jalan Jelupang Utama, Jelupang Village, Serpong Utara Sub-district, South Tangerang City. Based on the site plan document, the total land area for WTP construction is 4.89 Hectares. Considering that this project is one part of the National Strategic Project, the central government agency, in this case, represented by the Ministry of Public Works and Public Housing, is the agency that participates in the land acquisition preparation process. The preparation started with a request for recommendations on spatial conformity and direction for environmental documents from the Directorate General of Human Settlements to the South Tangerang City Government and the Ministry of Environment and Forestry.

After obtaining the principal location permit and direction to prepare an environmental document in the form of an Environmental Impact Assessment, land acquisition preparation enters the implementation stage. The implementation stage is carried out by the Banten Regional Settlement Infrastructure Centre (BPPW) with reference to Government Regulation No. 19 of 2021. The implementation starts from the request for a location determination letter from BPPW to the Mayor of South Tangerang City in accordance with the direction in the regulation that the Location Determination for the stages of Land Acquisition for the Public Interest with an area of no more than 5 (five) hectares is issued by the Mayor. After the location determination letter is issued, then BPPW continues the process by conducting transactions with landowners.

To supplement the findings from the desktop review, ERM conducted Key Informant Interviews with the Directorate General of Human Settlements, BPPW, and Landowner. The following are the findings from the Key Informant Interviews.

■ Socialization

On 30 July 2021, a Public Consultation on Land Acquisition for Public Interest in the Context of Project Development was held, which was attended by the Directorate General of Human Settlements, BPPW Banten, South Tangerang City Government, South Tangerang Police, land owner (H. Nurdin), and the community around the location. During the public consultation, information regarding the project development was conveyed and the community's input and perceptions regarding the land acquisition issue were sought. It was found from the discussion process that the land for project development is in the form of 1 overlay, with 1 ownership and 20 right bases in the form of *Sertifikat Hak Guna Bangunan* (SHGB, in English: Building Rights Title) under the name of PT Nur Akbar covering an area of 4.89 Hectares. The landowner as the Eligible Party agrees that his land is used as a location for development.

■ Compensation

The determination of the compensation amount for land acquisition is based on calculations from land appraisers (KJPP) Toto Suharto and Partners conducted in 2020. The results of the valuation of the land parcels gave rise to an average land price per square meter of Rp5,1097,070. The compensation was paid in December 2021 and January 2022. There are no complaints or issues related to the compensation received by the landowner. Signature of land certificate handover witnessed by the South Tangerang City Government including Head of BPN Office, City Government, District Attorney, High Attorney, BPKP, and representatives from KWS. No issues were found related to legal, financial, or reputational issues from the assessment and implementation of land acquisition compensation.

■ Loss of income

Prior to land acquisition, the land plot for project development belonged to PT Nur Abadi and was to be developed as housing. This land was acquired from the community through a sale and purchase process between PT Nur Abadi and the surrounding community in the 1980s.

There are no local people who use the land for economic activities such as farming, hunting, or other economic activities. The land already has a boundary in the form of a fence around the location of the area. It is to ERM's understanding that there is no loss of income belonging to the surrounding community from this land acquisition and the land acquisition process through a voluntary sale and purchase scheme between the landowner and BPPW Banten.

It is stated in the ESIA document that KWS will be committed to avoiding the use of public land for the construction of the transmission pipeline. Land Acquisition Plan for the pipeline route is currently not available at the moment. However, it is noted that The laying of the pipeline will pass through the access road to and from the KM41 toll road rest area, which can cause disturbance in economic activities of vendors in rest area.

C.1.2. Stakeholder Engagement

KWS has set up means to build community links through several stakeholder engagement activities. ERM participated in the Focus Group Discussion (FGD) process with relevant stakeholders and affected communities of the Project on 27 December 2022. The FGD was attended by the Director of Drinking Water of the Ministry of Public Work and Public Housing, BPPW Banten, KWS, Head of Subdistricts, and Affected Communities (traditional leader, religious leader, youth group, women group, disability). The FGD started with a questions and answers (Q&A) session to the Directorate General of Human Settlements and KWS, then continued with a discussion session where participants brainstormed and conveyed strategic issues that arise related to drinking water problems in their respective regions and how the presence of this Project can provide added value and benefits to the community. This discussion was manifested in a SWOT analysis table related to drinking water issues and project presence. Based on the results of the discussion of the strategic issues and SWOT analysis table, ERM then point out several key result of stakeholder engagement as follows:

■ Social Development

There are several potential community developments that can be conducted by the Project. This is as stated in the results of public hearings and FGDs that the community hopes that with the Project, benefits such as employment, economic development, community engagement, and improved public health can occur. The Project can take an important role in this regard as a catalyst for social development through local workforce recruitment activities and social and economic development as part of Corporate Social Responsibility. To be able to better formulate programs in accordance with the conditions and needs of the community, ERM concludes that KWS needs to conduct social mapping or need assessment of the affected communities.

■ Gender Equality and Social Inclusion Integration

It is noted from the engagement with stakeholders and affected communities that currently the Project has not involved many women, youth, and people with disabilities in the discussion and socialisation of activities. Special attention to vulnerable groups is needed by the Project by first identifying which parties can be included in vulnerable groups due to project development. Groups such as women-headed households, the elderly, and youth can also be part of social inclusion integration with the Corporate Social Responsibility (CSR) Program. This requires a strategy in preparing a Gender Action Plan (GAP), especially in raising gender-sensitive awareness on water use efficiency, water quality and hygiene education.

■ Human Rights

Human Rights issues are one of the concerns of stakeholders and affected communities, both in public hearings and FGDs. Attention to human rights is how to keep the community able to voice input, aspirations, and complaints related to the Project. Although it is to ERM's understanding that there are no Indigenous people or cultural heritage in the vicinity of the Project's area, the social system that has occurred in the community that is conducted either through formal or informal leaders is still respected by the Project. Another concern on human rights issues is on the aspect of awareness on zero tolerance to sexual harassment and gender-based violence

among workers and against women/girls and men/boys in the communities. It needs a mechanism and respond adequately to any such incidents.

C.1.3. Indigenous People

According to the desktop review, initial screening and site visit assessment, no Indigenous Peoples community was identified in the KIP and Kendal Regency. The majority of the people is Javanese, where according to the Statistical Bureau of Indonesia represent around 40% of the Indonesian population. There is no indication that the community living near to the proposed Project area across the sub-districts display the characteristics of Indigenous People. Thus, the principles and requirements of ADB SPS 3 on Indigenous Peoples are not applicable to the Project.

C.1.4. Compliance Assessment

Compliance analysis has been prepared to identify whether the actions and works undertaken by the Project were in accordance with the ADB's Safeguard Policy Statement and social requirements. The SCA was carried out covering Land acquisition (LA), Involuntary Resettlement (IR), and Indigenous Peoples (IP) / vulnerable ethnic minorities associated with the footprint of the Project. A list of information request was sent to the Client to enable for the supporting documents of the Project. Subsequently, interview with Client's management representative also took place to gain more information and to clarify some information from desk review process.

Four ERM consultants of comprising of two environment specialists and two social specialists conducted a site visit for around five (5) days, within December 2022 to January 2023. Key activities during the site visit includes site walkover around: the proposed WTP area, water distribution line, the end point of the water distribution pipeline, and villages around the WTP and distribution line. The site visit and observation of the villages area was aimed to gather information on social management, land acquisition and public perceptions of the Project.

The following section assesses compliance of the proposed Project with applicable national law/regulations and the requirements of ADB's SPS 2009 including recommendation based on the findings. Compliance level definition is detailed in the Table 5.4 below

| Rating | Definition |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Conformance/ Aligned | The Information available indicates that the company fulfils the international standard requirements and aligns with the intended outcome of the requirement. |
| Partially aligned | Information available indicates the Project partially fulfils the requirement and/or is partially aligned with intended outcome of the requirement. |
| Not aligned | Information available indicates the Project does not fulfil the requirement. |
| Not Applicable | The requirements do not apply to the Project as at the time of ESDD report writing. |

C.2. Compliance Assessment Matrix

The objective of the compliance assessment matrix is to determine whether past and present actions were in accordance with ADB's safeguard principles, specifically to assess, review, and plan appropriate measures to address outstanding compliance issues based on the impacts on the land acquisition and involuntary resettlement (Safeguards Requirement 2¹), and vulnerable indigenous people (Safeguard Requirement 3). The following is a table explaining the alignment between the key requirements of ADB Safeguards Policy Statement and observations from the project.

Table C 1. Compliance Assessment Matrix

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| 1 | ADB SPS 1 Environmental Assessment | Conduct an environmental assessment for each proposed project to identify potential direct, indirect, cumulative, and induced impacts and risks to physical, biological, socioeconomic (including impacts on livelihood through environmental media, health and safety, vulnerable groups, and gender issues), and physical cultural resources in the context of the project's area of influence. Assess potential transboundary and global impacts, including climate change. Use strategic environmental assessment where appropriate. | Environmental and Social Assessment AMDAL of the Project (Chapter Error! Reference source not found.) provides summary of the environmental document and liability approval progress of the Project. In summary, PT Karian Water services (KWS) is currently developed AMDAL document and submitted the AMDAL to the MoEF for review, the draft of AMDAL document was submitted 02 February 2023. However, the AMDAL document is established by using the old version of project layout, this AMDAL is yet to include the Alam Sutera – Semanan segment (a segment 10,009 meters length of 1,200 mm pipe and 961 meters with 1,400 mm pipe) therefore it is expected that the AMDAL and Liability approval will require further amendment to cover the missing segment. ESIA Document KWS has developed an ESIA document based on IFC performance standards, however this document only covers the old project design, it is understood that the project is under updating the ESIA to cover the additional pipeline route (the Alam Sutera – Semanan) | Partly Aligned | <ul style="list-style-type: none"> ■ KWS needs to obtain AMDAL Approval and Environmental liability approval prior to start the construction activity. ■ Upon the approval of the AMDAL and the issuance of the Environmental liability approval, KWS need to amend the AMDAL document to cover the missing segment of the Project (Alam Sutera – Semanan Segment) ■ The update ESIA document shall be completed prior to start construction. ■ Ensure that a summary of the final ESIA is accessible and available online. | 1 |
| 2 | ADB SPS 1 | Avoid, and where avoidance is not possible, | As of this report preparation, KWS has yet to develop specific procedure to monitor and measure | Not Aligned | <ul style="list-style-type: none"> ■ KWS needs to develop a specific procedure to | 3 |

¹ This assessment matrix will be focusing on past and present activities prior to ADB Involvement on the project, hence the land acquisition will only be focus on WTP Areas.

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| | Monitoring of Management Plan | minimize, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an environmental management plan (EMP) that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. | the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements | | monitor and measure the effectiveness of the environmental and social management program outlined in AMDAL and ESIA document. Furthermore, KWS needs to develop a specific procedure to monitor the project compliance with any related legal and/or contractual obligations and regulatory requirements | |
| 3 | ADB SPS 1 Stakeholder Engagement | Carry out meaningful consultation with affected people and facilitate their informed participation. Ensure women's participation in consultation. Involve stakeholders, including affected people and concerned non-government organizations, early in the project preparation process and ensure that their views and concerns are made known to and understood by decision makers and taken into account. Continue | KWS has opened means to build community relations through several stakeholder engagement activities. Several issues raised from the engagement was related to employment, business opportunity, health, and vulnerable groups involvement in the Project. KWS has acknowledged several key stakeholders to be engaged and develop stakeholder engagement plan as part of ESIA document dated 17 January 2023 | Partially Aligned | <ul style="list-style-type: none"> ■ Add specific section in the Stakeholder Engagement Plan document on how the Project will comply with national regulation and international standards to address human rights issues, and prevent gender-based violence in the community and Project site. ■ Ensure the development of the community grievances mechanism | 5 |

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| | | consultations with stakeholders throughout project implementation as necessary to address issues related to environmental assessment. Establish a grievance redress mechanism to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental performance. | | | | |
| 4 | ADB SPS 2 General Requirements | The client will consider feasible alternative Project designs to avoid or minimise physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits. | KWS has considered feasible alternative Project designs to avoid and minimise physical and/or economic displacement to the affected communities by changing the route of the transmission lines from WTP to offtake point. This consideration is described in the updated ESIA document. | Aligned | - | - |
| 5 | ADB SPS 2 Compensation and Benefits for Displaced Persons | When displacement cannot be avoided, the client will offer displaced communities and individual's compensation for loss of assets at full replacement costs and other assistance to help them improve or restore their standards of living or livelihoods, as provided in this PS. Compensation standards will be transparent and applied consistently to all | Land acquisition for WTP Areas has been conducted in compliance with National Regulation regarding the socialization process, land appraisal, and compensation payment. This is confirmed during interviews with landowner and BPPW Banten. There is no economic and physical displacement on land acquisition for WTP. Furthermore, it is stated in the ESIA document that KWS will be committed to avoiding the use of public land for the construction of the transmission pipeline. Land Acquisition Plan for the pipeline route is currently not available now. However, it is noted that the laying of the pipeline will pass through the access road to and from the KM41 toll road rest | Partially Aligned | Develop Resettlement Plan which will focus on the water pipeline and transmission lines. It shall be noted that Resettlement Framework (RF) has been developed by the project for land acquisition in WTP Areas which will be the basis of Resettlement Plan developed in the future. The Resettlement Framework will also be the reference document should any valid land legacy issues arise. | 23 |

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| | | communities affected by the displacement. | area, which can cause disturbance in economic activities of vendors in rest area. | | | |
| 6 | ADB SPS 2 Meaningful Consultation with the Affected Persons | Carry out meaningful consultations with affected persons, host communities, and concerned nongovernment organizations. Inform all displaced persons of their entitlements and resettlement options. Ensure their participation in planning, implementation, and monitoring and evaluation of resettlement programs. Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations. | Socialization process for land acquisition for WTP has been conducted on 30 July 2021. This was attended by was attended by the Directorate General of Human Settlements, BPPW Banten, South Tangerang City Government, South Tangerang Police, landowner (H. Nurdin), and the community around the location. | Aligned | - | - |
| 7 | ADB SPS 2 Grievance Mechanism | The client will establish a grievance mechanism consistent with PS1 as early as possible in the Project development phase. | KWS stated in the ESIA document that The Project will provide a feedback / grievance mechanism and opportunities to incorporate received feedback into the Project during operation. However, specific grievance mechanism during land acquisition process for WTP land acquisition has not been developed | Partially Aligned | Resettlement Framework has covered feedback/grievance mechanism, but a specific and detailed Grievance Redress Mechanism need to be in place prior to land acquisition/access negotiations. | 24 |
| 8 | ADB SPS 2 | Where involuntary resettlement is | It is noted for the WTP's Land Acquisition that there is no physical and/or economic displacement to the | Not Applicable | - | - |

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|---------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|-----------|-----------------|------------------------------|
| | Livelihood improvement or Restoration of displaced persons | unavoidable, a census will be conducted to collect appropriate socioeconomic baseline data to identify the persons who will be displaced by the Project, determine who will be eligible for compensation and assistance. The client will establish procedures to monitor and evaluate the implementation of a Resettlement Action plan or Livelihood Restoration Plan and take corrective action, as necessary. | landowners and surrounding communities. Hence this section is not applicable. | | | |
| 9 | ADB SPS 2 Assistant for physical & economic displace persons | Provide physically and economically displaced persons with needed assistance, including the following: (i) if there is relocation, secured tenure to relocation land, better housing at resettlement sites with comparable access to employment and production opportunities, integration of resettled persons economically and socially into their host communities, and extension of project benefits to host communities; (ii) transitional support and development assistance, such as land development, credit facilities, training, or | | | | |

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------|------------------------------|
| | | employment opportunities; and (iii) civic infrastructure and community services, as required. | | | | |
| 10 | ADB SPS 2 Improvement of poor displaced persons & vulnerable groups | Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards. In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide them with appropriate income sources and legal and affordable access to adequate housing. | KWS has collaborated with relevant Government Contracting Agency (GCA) / Ministry of Public Works and Public Housing and other relevant local government (South Tangerang Mayor, BPPW Banten) related to land acquisition preparation and implementation. This is confirmed during FGD and KIIs to stakeholder | Aligned | - | - |
| 11 | ADB SPS 3 Initial Screening | Screen early on to determine (i) whether Indigenous Peoples are present in, or have collective attachment to, the project area; and (ii) whether project impacts on Indigenous Peoples are likely. | The initial screening conducted and stated in the ESIA document has mentioned that there is no indication that the community living near to the proposed Project area across the sub districts display the characteristics of Indigenous People | Aligned | - | - |
| 12 | ADB SPS 3 Meaningful consultation | Undertake meaningful consultations with affected Indigenous Peoples communities and concerned Indigenous Peoples organizations to solicit their participation (i) in designing, implementing, and monitoring measures to | | Not Applicable | - | - |

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|----------------|-----------------|------------------------------|
| | | avoid adverse impacts or, when avoidance is not possible, to minimize, mitigate, or compensate for such effects; and (ii) in tailoring project benefits for affected Indigenous Peoples communities in a culturally appropriate manner. To enhance Indigenous Peoples’. | | | | |
| 13 | ADB SPS 3 Ascertain the consent of affected Indigenous Peoples | Commercial development of the cultural resources and knowledge of Indigenous Peoples; (ii) physical displacement from traditional or customary lands; and (iii) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual uses that define the identity and community of Indigenous Peoples. | | Not Applicable | - | - |
| 14 | ADB SPS 3 Avoidance of adverse impact | Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected Indigenous Peoples communities participate in the design, implementation, and | | Not Applicable | - | - |

| No | References | Key Requirements | Findings and Observations | Alignment | Recommendations | Corresponding ESAP Action No |
|----|------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------|-----------------|------------------------------|
| | | monitoring and evaluation of management arrangements for such areas and natural resources and that their benefits are equitably shared. | | | | |

C.3. Corrective Action Plan

After completing the Compliance Assessment Matrix, this section tabulates the Corrective Action Plan. Corrective Action Plan addresses issues identified during the compliance assessment by specifying time-bound measures to achieve and maintain compliance with the objectives, principles, and requirements of ADB's safeguard policy statement including completion parameter and PIC for each action plan within a reasonable time frame. However, it shall be noted that based on the Compliance Assessment Matrix, the project was considered to be in compliance to ADB SPS with regards to past action on land acquisition of the WTP. Hence, these action plans are associated to ongoing processes. These action plans will be incorporated and undertaken through the development of the ESIA, ESMS, ESMP, labour and working condition, and Land Acquisition Related document and procedures.

Table C 2. Corrective Action Plan

| No | Findings | Corrective Action plan | Timeline | PIC | Completion parameter |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------------------|-------------------------------------------------------------------------------------------|
| 1 | KWS does not have a specific procedure stated in the Stakeholder Engagement Plan document to describe on how the project will comply with, fulfil human rights issues, and prevent gender-based violence in the community and project site | <ul style="list-style-type: none"> KWS needs to add specific procedures related to human rights issues and gender-based violence in the community and project site to existing Stakeholder Engagement Document | Before Construction of WTP | External Relation Dept. | <ul style="list-style-type: none"> Updated stakeholder engagement document |
| 2 | In the ESMP, the project commits to provide community grievances during the construction phase in | <ul style="list-style-type: none"> Ensure the development of the | Before Construction of WTP | EHS Dept. | <ul style="list-style-type: none"> Developed Community Grievance Mechanism |

| No | Findings | Corrective Action plan | Timeline | PIC | Completion parameter |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| | relation to the conduct of security personnel and safety issues or activities. | community grievances mechanism | | | |
| 3 | Specific grievance mechanism during land acquisition process for WTP land acquisition has not been developed | <ul style="list-style-type: none"> Grievance Redress Mechanism need to be in place prior to land acquisition/access negotiations. | Before Construction of WTP | Land Acquisition Dept. | <ul style="list-style-type: none"> Specific Grievance Redress Mechanism for land acquisition/access negotiations |
| 4 | It is stated in the ESIA document that KWS will be committed to avoiding the use of public land for the construction of the transmission pipeline. Land Acquisition Plan for the pipeline route is currently not available now. However, it is noted that the laying of the pipeline will pass through the access road to and from the KM41 toll road rest area, which can cause disturbance in economic activities of vendors in rest area. | <ul style="list-style-type: none"> Develop Resettlement Plan which will focus on the water pipeline and transmission lines. It shall be noted that Resettlement Framework (RF) has been developed by the project for land acquisition in WTP Areas. This which will be the basis of Resettlement Plan developed in the future. The Resettlement Framework will also be the reference document should any valid land legacy issues arise. | Before Construction of Pipelines | Land Acquisition Dept. | <ul style="list-style-type: none"> Resettlement Framework with specific section on land legacy issues. |

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