

SKOPJE WASTEWATER TREATMENT PLANT FYR MACEDONIA



Stakeholder Engagement Plan FINAL

1 November 2018

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Abbreviations

EBRD	European Bank for Reconstruction and Development
EBRD ESP	EBRD's Environmental and Social Policy
EIB	European Investment Bank
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
FYR	Former Yugoslavian Republic
MoEPP	Ministry of Environment and Physical Planning
NGO	Non-governmental Organisation
NTS	Non-Technical Summary
PR	Performance Requirements
SEP	Stakeholder Engagement Plan
WWTP	Wastewater treatment plant

1 INTRODUCTION

1.1 Project Description and Context

Introduction

The European Bank for Reconstruction and Development (**EBRD**) and the European Investment Bank (**EIB**) (together: the **Lenders**) are considering providing finance to Former Yugoslav Republic (FYR) Macedonia to fund the construction of a new wastewater treatment plant (WWTP) (**the Project**) in the City of Skopje (**the City**). The Project will serve 9 of the 10 municipalities that make up the City.

A location has been selected that is adjacent to the Vardar River to the east of the City. The investment will be implemented by Public Enterprise (PE) Vodovod i Kanalizacija Skopje (the **Public Enterprise**), fully owned by the City. The beneficiary of the loan will be the PE. The Project will also require the expansion of the sewage network, which is being implemented separately as an ongoing process by the City of Skopje.

Brief Description of the Project

The location for construction of the WWTP, as defined by the General Urban Plan (GUP) Skopje 2012-2022, is situated in the south-east part of the Skopje Valley, within the Municipality of Gazi Baba. This Municipality is located in the eastern part of the City. The Vardar River is located south from the site, flowing in west to east direction.

The Project has two phases. Wastewater treatment will consist of pre-treatment and biological treatment units that will be constructed in the first phase up to 2030. The upgrade of biological treatment to include removal of nitrogen and phosphorus will be constructed in the second phase of the project (up to 2045). A disinfection unit and separate treatment of the storm water were considered optional facilities to be constructed in the second phase of the project. The treated effluent will be discharged into the Vardar River. The design capacity of the WWTP is 625,000 PE in 2030, and 650,000 PE in 2045.

The nearest settlements to the WWTP is **Vardarishte** neighbourhood (the first houses are located at an air distance of 400 m north to the WWTP, whereas the remaining part of the neighbourhood is located at 650 m north). Other settlements in the vicinity of the WWTP are **Gorno Lisiche** neighbourhood (700 m West) and **Ergele** neighbourhood (1100 m). The following figure shows the WWTP location and surrounding settlements.

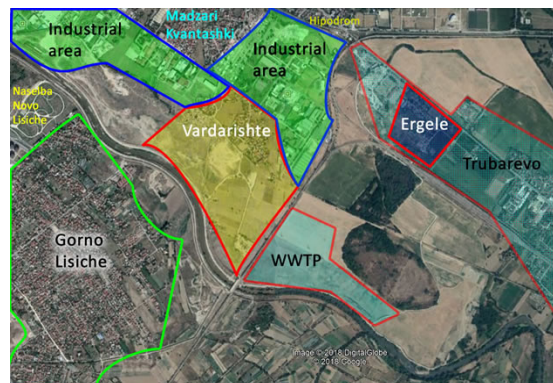


Figure 1: Map showing the WWTP location and surrounding settlements (source: the Consultant)

Project Benefits

The key benefits of the Project are:

- Discontinuation of the current practice of discharging of untreated sewage into the Vardar River
- Expansion of the sewage collector and installation of a comprehensive system for wastewater treatment in the City, which will lead to improvement of the environmental and health situation of the City population and downstream areas. More than 500,000 residents of the City will benefit from improved wastewater management, as well as all other residents of the downstream settlements of FYR Macedonia and Greece up to the Aegean Sea
- Fulfilment of strategic objectives defined in the water management strategies and plans at state level and fulfilment of the provisions of the local legislation for ensuring that waterbodies achieve 'good status' and to prevent any further deterioration in the existing status of surface waters and groundwater
- Increased employment opportunities for local population during the WWTP construction and operation.

Project Categorisation

As this Project involves the development of a greenfield WWTP with a capacity exceeding 150,000 PE, it has been categorised as a Category "A" project in line with the Lenders' requirements.

1.2 Objectives and Scope of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan ("SEP") was developed by the Public Enterprise "Vodovod i kanalizacija" Skopje in order to clearly communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

The objective of this SEP is to improve and facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for all stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with the laws of FYR Macedonia, as well as the requirements of EBRD and EIB.

This SEP will be updated as necessary.

2 REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

2.1 National Legislation Requirements

Public disclosure and consultation activities are required under national legislation (specifically, the *Law on Environment*¹) during the **environmental impact assessment (EIA) process**. The procedures for disclosure and consultations include the following steps:

- The public is informed about details of disclosure of the draft plan/document (where the hard copy is available for review, the dates and time when it can be reviewed) through the media; citizens/organisations are invited to send comments and/or attend public consultations;
- Public consultations are held in an appropriate local venue (e.g. city hall) and the plan/document is presented;
- Comments received from all stakeholders are processed, and the plan/document is revised to reflect them.

In line with the *Law on Urban and Spatial Planning*², the public must also be informed and consulted throughout the **process of development and adoption of urban and spatial planning documents**.

Furthermore, the country acceded to the **Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters** in 1999. The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and transboundary environment. Article 2(c) of the Convention states that the Convention applies not only to government at all levels, but also to “any other natural or legal persons having public responsibilities or functions, or providing public services, in relation to the environment, under the control of [a public authority].” In line with the Convention, the Public Enterprise is required to:

- Respond to requests from the public for environmental information (any member of the public can make a request, regardless of citizenship, nationality or domicile)
- Regularly collect and disclose environmental information to the public and notify the public that the information is available; and provide information for emergencies.

2.2 EBRD Requirements

EBRD has set out a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (*Information Disclosure and Stakeholder Engagement*) of EBRD’s Environmental and Social Policy (ESP) emphasises the importance of an open and transparent engagement between the project, its workers, local communities directly affected by the project and other stakeholders as an essential element of good international practice and corporate citizenship. Stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

In accordance with PR 10, projects are required to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale or the risks, impacts and development stage of the project, and conduct

¹ O.G. of FYR Macedonia, No. 53/2005, with the latest amendments in 39/16

² O.G. of FYR Macedonia, No. 199/14, with the latest amendments in 163/16

stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

EBRD's ESP contains specific disclosure and consultation requirements for "Category A" projects (i.e., projects which could result in potentially significant adverse future environmental and/or social impacts which cannot readily be identified). The environmental and social impact assessment process includes a public disclosure and consultation process as specified in PR 10. Where an Environmental and Social Action Plan (ESAP) has been agreed between EBRD and the project, the project must disclose the ESAP to the affected parties. The project must keep the environmental and social impact assessment in the public domain throughout the life of the project, but it may be amended, from time to time, with additional information, or archived following project completion, as long as it is available on request in a timely manner.

The client is required to provide regular reports to its interested and affected stakeholders on its environmental and social performance, as a separate publication, or on its web site. These reports must be in a format accessible to the affected communities and their frequency will be proportionate to the concerns of affected communities, but not less than annually.

In line with EBRD's Public Information Policy (2014), for "Category A" projects, in addition to the disclosure required of the clients under the ESP, the Bank will make available environmental and social impact assessments on the EBRD website in its Headquarters in London and in the relevant EBRD Resident Office a minimum of 120 calendar days prior to Board consideration for public sector projects.

2.3 EIB Requirements

The EIB actively promotes the right to access to information, as well as public consultation and participation. Standard 10 of the *EIB Statement of Environmental and Social Principles and Standards (2009)* requires promoters to uphold an open, transparent and accountable dialogue with all project-affected communities and relevant stakeholders in an effective and appropriate manner. Stakeholder engagement is an inclusive and iterative process that involves, in varying degrees, stakeholder analysis and engagement planning, timely disclosure and dissemination of/access to information, public consultations and stakeholder participation, and a mechanism ensuring access to grievance and remedy.

Specific objectives of Standard 10 are:

- Establish and maintain a constructive dialogue between the promoter, the affected communities and other interested parties throughout the project life cycle;
- Ensure that all stakeholders are properly identified and engaged;
- Engage stakeholders in the disclosure process, engagement and consultations in an appropriate and effective manner throughout the project lifecycle;
- Ensure that the relevant stakeholders, including commonly marginalised groups on account of gender, poverty, educational profile and other elements of social vulnerability, are given equal opportunity and possibility to voice their opinions and concerns, and that these are accounted for in the project decision-making; and,
- Duly verify and assess that the quality and process of engagement undertaken by third parties on the project conform to the provisions included in the present standard.

3 PREVIOUS STAKEHOLDER ENGAGEMENT

Stakeholder engagement activities in line with spatial planning requirements

During the adoption of spatial planning documents (i.e., the General Urban Plan for the City of Skopje – GUP), the public was consulted through several public hearings held in line with the national legislation. The draft GUP was publicised in 2015 on the City website and kept in hard copies at the City premises. No comments were received regarding the location of the WWTP.

In parallel with the procedure for GUP preparation, the procedure for developing a Strategic Impact Assessment (SEA) related to the GUP was initiated, as required by the *Law on Spatial and Urban Planning*³ and the *Law on Environment*⁴. The SEA Report was prepared in 2012⁵. The public consultations for the SEA procedure were conducted under the *Decree on Public Participation in the Process of Preparation of Environmental Regulations, Plans and Programs*⁶. The draft SEA was published on the website of the City of Skopje and was made available in hard copy in the premises of the City. On 13 August 2012, a public hearing was organised in the premises of the City to present the key findings of the SEA Report. The participants discussed only general issues regarding the procedure, timing of the presentation, the scope of documentation presented and matters related to environmental protection for future projects. The issue of wastewater treatment and the sewage system was not discussed.

Stakeholder engagement activities in line with environmental permitting requirements

In line with the national environmental legislation, the draft ESIA Study for the WWTP was prepared and submitted to the Ministry of Environment and Physical Planning (MoEPP) in 2017. It was publicly disclosed on the webpage of MoEPP⁷ on 25 April 2017 and was available in hard copy at the premises of MoEPP's Public Relations Office. The public hearing was organised on 14 July 2017 in the premises of the City of Skopje. The main issues raised during the public hearing referred to technical details of the Project (e.g., production of biogas and its utilisation, possibility to use the WWTP incinerator for sludge combustion from other WWTPs in other regions, use of SCADA for monitoring of waste water flow rate, etc.). Only a few questions were asked about environmental aspects of the Project (e.g., the impact of the incinerator on the protected area "Ostrovo" near the WWTP site), and only one about land use issues (one person inquired whether his land plot will be affected by WWTP construction).

³ O.G. of FYR Macedonia, No. 199/14, with the latest amendments in 136/16

⁴ O.G. of FYR Macedonia, No. 53/05, with the latest amendments in 99/18

⁵ By the Consultancy Company "Tehnolab"

⁶ O.G. of FYR Macedonia, No. 147/08, 45/11

⁷ http://www.moep.gov.mk/wp-content/uploads/2016/01/EIA_WWTP_Sk_-2017_02_06_final-en.pdf

4 STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Introduction

In order to adequately respond to the needs of different groups, communication and information channels have been designed for all identified stakeholders in accordance with their needs. The Public Enterprise “Vodovod i kanalizacija” Skopje recognises that meaningful and timely engagement with stakeholders can enable the success of the Project. The engagement process will be used to obtain comments and suggestions for the development of the Project, which may enhance the Project design and lead to extended local benefits.

Project stakeholders have been identified in order to address the different consultation requirements. Stakeholders include persons or groups that are:

- directly and/or indirectly affected by the Project;
- have certain interests in the Project and its activities;
- have the ability to affect the Project itself and its final outcome.

Any stakeholders that are not identified at this stage of the Project may directly contact the Public Enterprise to make themselves and their needs known to facilitate the effective implementation of the SEP.

4.2 Responsibility for SEP Implementation

A Project Implementation Unit (PIU) has been set up by the Public Enterprise, which will be responsible for Project implementation, including the implementation of this SEP, under the supervision of the Lenders. The PIU consists of Head of PIU, four PIU members and one responsible person for administrative support.

A responsible person has been appointed for implementation of this SEP during the entire Project cycle, and in charge of communicating with the communities (see contact information in Chapter 5 of this SEP).

All contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of SEP (see Chapter 5 for more details). The grievance mechanism requirements will be laid out in the tender documentation and contracts signed with the contractors.

4.3 Planned Information and Communication Arrangements

The City of Skopje and the Public Enterprise have established mechanisms for communication with the public. The Public Enterprise has a regularly updated webpage on which it announces news, notifications and reports on current projects. The Public Enterprise has also established a grievance mechanism (in accordance with according its quality management system procedure VIC-823-102) to resolve user complaints, which is publicly available on its website and through which citizens can submit any concerns with the operation of the Public Enterprise. The City also has a regularly updated webpage through which it regularly informs the citizens about the activities in the City in through providing relevant information, including the announcements for organised public hearings on environmental/urban planning issues. The webpage contains a form for submitting inquiries and grievances.

The Public Enterprise and the City will carry out public consultations and information dissemination that will reflect main issues of relevance to the Project.

Documents and information to be disclosed

The Public Enterprise intends to disclose the following Project disclosure package:

- This **Stakeholder Engagement Plan** (SEP);
- **ESIA Study** developed in 2017;

- **Project Grievance Form** (see [Appendix A](#)) and **Public Grievance Leaflet** (see [Appendix B](#));
- **Non-technical Summary** of the environmental and social assessment of the Project;
- **Environmental and Social Action Plan (ESAP)**.

The disclosure package will be publicly available in Macedonian (as well as English where available) immediately upon its availability, on the websites of the Public Enterprise, the City and the Ministry of Environment and Physical Planning, as follows:

- www.skopje-vodovod.com.mk
- www.skopje.gov.mk
- www.moep.gov.mk

The documents will remain disclosed on the website of the Public Enterprise, the City and EBRD during a period of 120 calendar days prior to consideration of the Project by the EBRD's Board of Directors, and will remain publicly available throughout the life of the Project.

In addition, hard copies of the documents will be available at the following locations:

1. Public Enterprise Vodovod i Kanalizacija (address: Str. Lazar Lichenoski 9, Skopje)
2. City of Skopje (address: Bul. Ilinden 82, Skopje)
3. Municipality of Gazi Baba (address: Str. Arhimedova 2, Skopje)
4. Municipality of Aerodrom (address: Bul. Jane Sandanski 109B, Skopje)
5. Ministry of Environment and Physical Planning (address: Ploshtad Preseveta Bogorodica 3, Skopje)
6. EBRD Resident Office in Skopje (address: Soravia Centre Skopje, 7th floor, Filip II Makedonski no. 3, 1000 Skopje)
7. EBRD Headquarters in London (address: One Exchange Square London EC2A 2JN United Kingdom).

Planned meetings

The City and the Public Enterprise will schedule and hold at least one public consultation meeting after disclosure of the above listed documents. The meeting is tentatively planned for October or November 2018. The Public Enterprise will inform all stakeholders about the exact date, time and venue where the meeting will be held, at least 7 days in advance (but preferably 2 weeks), through disclosure through the websites of the Public Enterprise and City, local media (newspapers, online news portals) and the bulletin boards of Municipalities of Aerodrom and Gazi Baba. The announcement of the public meeting will also be posted in the neighbourhoods of Vardarishte, Gorno Lisiche and Ergele, in order to specifically target the local population living in these communities. In addition, NGOs listed in Annex D to this SEP will be directly contacted and informed of the public meeting.

All available Project information and documents will be disclosed to the public at least 2 weeks in advance of the meetings. If necessary, separate meetings will be held to ensure that the stakeholder engagement is gender responsive.

The meetings will be aimed at providing information to the public about the construction and operation of the planned WWTP. Participants will be able to present their opinions and remarks with regard to the Project, as well as suggest possible solutions of the issues raised.

The conclusions of the meeting will be agreed during the meeting and recorded. All justified comments and proposals will be considered and appropriately addressed. The PIU will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

In addition, individual consultation meetings for specific issues may be organised at the initiative of the Public

Enterprise, the City or by any identified stakeholder groups/individuals.

A summary of all stakeholder engagement and disclosure requirements listed above is provided in Table 1 below.

Table 1: Summary of Stakeholder Engagement and Disclosure Requirements

	Activity	Timing/further detail	Responsibility
1	<p>Ensure that the following Project documents are publicised on the websites of the Public Enterprise, the City and MoEPP:</p> <ul style="list-style-type: none"> • This SEP • ESIA Study • Project Grievance Form and Public Grievance Leaflet • Non-technical Summary • Environmental and Social Action Plan <p>Print and keep hard copies of documents at premises of MoEPP, Public Enterprise, City, Municipality of Gazi Baba and Municipality of Aerodrom.</p>	<p>All available Project information and documents will be disclosed to the public as soon as available, but at least 2 weeks in advance prior to the public meeting.</p> <p>The disclosure package will be publicly disclosed on the website of the Public Enterprise, City and EBRD during a period of 120 calendar days prior to consideration of the Project by the EBRD's Board of Directors, and will remain publicly available throughout the life of the Project.</p>	PIU
2	<p>Organise at least one public consultation meeting after disclosure of the above listed documents</p> <p>Encourage written proposals and comments</p> <p>Provide timely access to the documents before any meeting (at least 2 weeks)</p>	<p>Stakeholders will be informed about the exact date, time and venue where a meeting will be held, at least seven days in advance (but preferably 14 days), through disclosure through the websites of the Public Enterprise and City, local media and the bulletin boards of Municipalities of Aerodrom and Gazi Baba.</p> <p>The announcement of the public meeting will also be posted in the neighbourhoods of Vardarishte, Gorno Lisiche and Ergele.</p> <p>NGOs listed in Annex D to this SEP will be directly contacted and informed of the public meeting.</p>	PIU
3	Organise individual consultation meetings	As needed or requested by the Public Enterprise, City or by any identified stakeholder groups/individuals	PIU
4	Document all opinions, remarks and possible solutions with regards to the Project raised by stakeholders during consultation meetings, and address appropriately	Ongoing	PIU
5	Publicise information about the extent, timing and duration of planned construction works, and any expected disruptions and inconveniences via the websites of the Public Enterprise and City	Two weeks prior to the start of WWTP construction works	PIU

4.4 Identified Stakeholders and Specific Communication Requirements

A list of identified stakeholders and specific communication requirements are provided in Table 2 below.

Suggestions for improvement of proposed communication methods are welcomed, and can be sent to the contact person whose details are provided in Chapter 5 this SEP.

Table 2: Stakeholder Analysis and Communication Requirements

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
<p>Local residents in the vicinity of the planned WWTP Though located on the very edge of the City of Skopje, the WWTP will be constructed in the vicinity of some of Skopje’s neighbourhoods/urban units and rural settlements/suburbs attached to the City. The first houses of the nearest populated neighbourhood Vardarishte are located at air distance of approx. 400 m, measured from the centre of the WWTP site. The remaining part of the Vardarishte neighbourhood is at a distance of approx. 650 m. Across the river there is another significantly populated and socially compact neighbourhood named Gorno Lisiche, whose first houses are located at distance of approx. 700m from the centre of the WWTP’s site.</p>	<p>During construction, machinery and heavy vehicles on local roads will generate noise that may temporarily impact local population in the neighbourhoods Vardarishte, Gorno Lisice and Ergele.</p> <p>During operation of the WWTP, these settlements are not expected to be impacted by noise as a result of work of mechanical equipment at the site due to their distance. In addition, it is not expected that these settlements will be exposed to odour nuisances from the operation of the WWTP if proper functioning of the odour treatment facilities in the WWTP is ensured.</p>	<p>Providing timely information on risks and disturbances associated with the construction and operation period, related to disturbances listed under ‘specific issues’.</p>	<ul style="list-style-type: none"> Public consultation meeting, and individual meetings as necessary Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board in the branch offices of the Municipalities of Aerodrom and Gazi Baba, at least two weeks prior to the start of any construction works
<p>General public of the City of Skopje</p>	<p>Management and discharge of wastewater in the City of Skopje</p>	<p>Providing timely information on Project benefits and risks</p>	<ul style="list-style-type: none"> Public consultation meeting Media/press releases
<p>Relevant government authorities, ministries and public institutions, including:</p> <ul style="list-style-type: none"> City of Skopje Municipalities of Aerodrom and Gazi Baba Ministry of Environment and of Physical Planning Ministry of Agriculture, Forestry and Water Management Ministry of Transport and Communications Institute for Public Health - Skopje 	<p>Issuing permits, consents and opinions in accordance with local legislation, control of compliance with local legislation</p>	<p>Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures</p> <p>Reporting based on national legislation requirements</p>	<ul style="list-style-type: none"> As defined by national legislation

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
<p>Interested non-governmental organisations (NGOs) The list of potentially interested NGOs includes:</p> <ul style="list-style-type: none"> • Macedonian Ecological Society (MES) • The Ecologists’ Movement of Macedonia (DEM) – Skopje • Eko-svest – Skopje • Front 21/42 • Go Green • Other interested environmental NGOs <p>Even though such organisations have not yet demonstrated a specific interest in this Project, all shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation.</p> <p>Note: Any organisations interested in the Project can send their contact details to the PIU to be included in the <i>Table of NGOs</i> provided in <u>Annex D</u> of this SEP and notified directly about Project events.</p>	<p>Stakeholders of high significance for the Project’s success which are interested in protection of the environment and human health.</p>	<p>Providing timely information, communication and consultations</p>	<ul style="list-style-type: none"> • Public consultation meetings, and individual consultation meetings as necessary • Direct email communication • Media/ press releases
<p>Employees of the Public Enterprise, and the Trade Union</p> <hr/> <p>Contractors or subcontractors for construction, monitoring and supervision of works, and their employees</p>	<p>Stakeholders of high significance for the Project’s success who are directly or indirectly engaged in Project planning and implementation</p>	<p>Providing timely information about the planned Project activities</p> <hr/> <p>Provision of Project code of conduct and work safety and health regulations, environmental protection requirements</p>	<ul style="list-style-type: none"> • The Public Enterprise’s internal communication channels • Trainings as necessary <hr/> <ul style="list-style-type: none"> • Information through tender procedure and contracts • Communication via supervising engineers • Toolbox talks at construction sites on health and safety topics • Monthly reports on progress of works to be submitted by contractors during construction works • Trainings

5 GRIEVANCE MECHANISM

The PIU within the Public Enterprise will establish a Grievance Registry, and will inform all stakeholders of the grievance mechanism by communicating the availability of this registry, its function, the contact persons and the procedures for submitting a complaint in the affected areas. The Project Grievance Form ([Appendix A](#)) and the Public Grievance Leaflet ([Appendix B](#)) will be disclosed on the websites of the Public Enterprise and City, and also be made available in printed copies in the premises of the Public Enterprise, the City, the Municipality of Gazi Baba and the Municipality of Aerodrom.

Any comments or concerns can be brought to the attention of PIU verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post, fax or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

The grievance form may also be submitted directly to the Contractor for construction works, which will forward any such received grievances/comments to the Public Enterprise without delay to allow the Public Enterprise to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below). The Contractor is obliged to hand out the Project Grievance Form, explain the grievance mechanism to the concerned citizen(s) and forward the filled-in Grievance Form to the Public Enterprise. The Public Grievance Leaflet concerning the grievance mechanism will be available at the construction site at all times, whether the construction site is closed or open. The leaflet will be plasticised and hung on the construction site information board to be publicly available at all times.

All grievances will be recorded by the PIU in the Grievance Registry and assigned a number, and acknowledged within seven calendar days (the flowchart for processing grievances is enclosed in [Appendix C](#)). The Registry will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the registry with the following information:

- description of grievance,
- date of receipt of grievance and when acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures, preventive measures), and
- date of resolution and closure / provision of feedback to the complainant.

If the grievance/complaint is vague and not clear enough, the PIU will assist and provide counsel in formulating/redrafting the submission, in order for the grievance/complaint to become clear, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project.

The PIU will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 25 calendar days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant. During the process of informing the complainant of the proposed action, the PIU will validate complainant

satisfaction and will make efforts to follow-up with the complainant to verify successful implementation of the action.

If the PIU is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/ justification on why the issue was not addressed. The response will also contain an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

At all times, complainants may seek other legal remedies in accordance with the legal framework of FYR Macedonia, including formal judicial appeal.

A separate grievance mechanism is available for workers.

Contact information for enquiries and grievances:

Attention: Mr. Kiril Zernovski
Public Enterprise "Vodovod i Kanalizacija"
Address: Str. Lazar Lichenoski, 9 Skopje
Tel: + 389 2 3240 320
E-mail: kiril.zernovski@vodovod-skopje.com.mk

6 MONITORING AND REPORTING

The results of the stakeholder engagement process will be included in Monitoring Reports to be prepared by the PIU. The first report will be produced three months after the beginning of the Project, and will continue on a quarterly basis during construction works and on an annual basis during operation. The reports will include the following information:

- Place and time of held consultation meetings and other types of engagement activities, with information on the number of participants;
- Issues and concerns raised during consultation meetings and information on how the issues raised were taken into consideration by the Project Team;
- Number and types of grievances raised in the reporting period, with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism.

In addition, the PIU will submit Annual Environmental and Social Reports to the Lenders summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism.

The PIU will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to the Lenders.

7 APPENDICES

A. Project Grievance Form

Reference Number		
Full name (optional)		
<input type="checkbox"/> I wish to raise my grievance anonymously. <input type="checkbox"/> I request not to disclose my identity without my consent.		
Contact information		<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).		<input type="checkbox"/> By telephone: _____ <input type="checkbox"/> By E-mail
Preferred language of communication		<input type="checkbox"/> Macedonian <input type="checkbox"/> Albanian <input type="checkbox"/> Other: _____
Description of Incident for Grievance		What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / Grievance		
		<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen?		

Signature: _____

Date: _____

Please return this form to:
 Attention: Mr. Kiril Zernovski
 Public Enterprise "Vodovod i Kanalizacija", Skopje
 Address: Str. Lazar Lichenoski, 9
 Tel: + 389 2 3240 320
 E-mail: kiril.zernovski@vodovod-skopje.com.mk

B. Suggested Text for Public Grievance Leaflet

The Public Enterprise “Vodovod i kanalizacija” Skopje is striving to ensure that the Skopje Wastewater Treatment Plant Project will not result in adverse impacts for those living near the Project sites or for other potentially affected stakeholders. However, should there be any issues, we would like to hear about any concerns or grievances that you may have in relation to Project activities.

What kind of grievance can I lodge?

Anyone can lodge a grievance if they feel that Project activities are negatively affecting them, their community or their local environment. Examples of grievances could include, but are not limited to:

- Increased noise, access issues or other nuisances during construction works or operation;
- Concerns regarding community health and safety, such as increased heavy traffic on local roads, local road damage or inadequate management of waste during construction works;
- Concerns about the environment;
- Practices that endanger the health, safety and security of employees working on the Project;
- Inadequate implementation of the Project’s Stakeholder Engagement Plan by the Public Enterprise.

How can I submit a grievance?

Anyone can submit a grievance to the Public Enterprise (contact information given below) or the Contractor without any costs incurred to the complainant, in the following ways:

- a. verbally (in person or by telephone)
- b. in writing by filling in the attached Project Grievance Form or in other form if preferred, and sending it by personal delivery, post, fax or e-mail

Contact information:

Attention: Kiril Zernovski

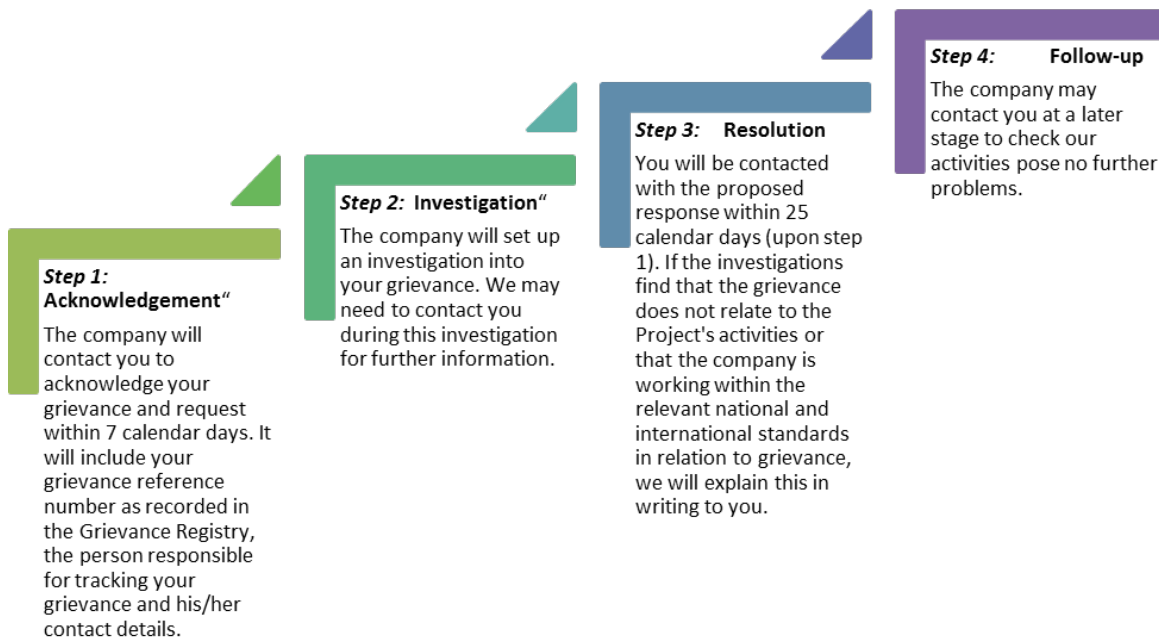
Public Enterprise “Vodovod i Kanalizacija”, Skopje

Address: Str. Lazar Lichenoski, 9, Skopje, Tel: + 389 2 3240 320, E-mail: kiril.zernovski@vodovod-skopje.com.mk

Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, the Public Enterprise will ensure that your name and contact details are not disclosed without your consent and only the Public Enterprise team directly working on the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

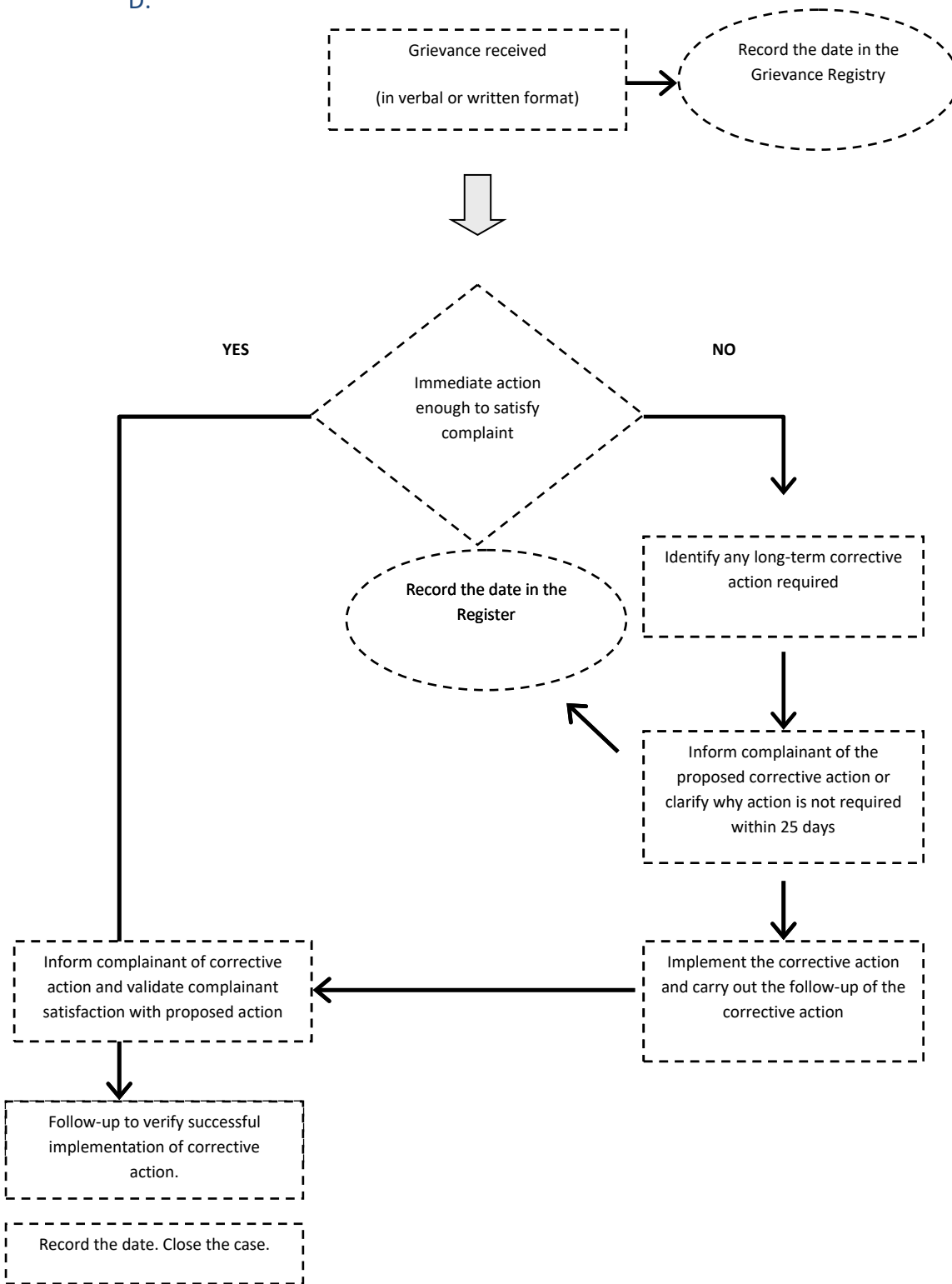
How will “Vodovod i kanalizacija” Skopje deal with my grievance?

The Public Enterprise will go through the following steps to deal with your grievance:



C. Flowchart for Processing Grievances

D.



List of NGOs in Project Area

Name of organisation	Contact Information
Macedonian Ecological Society (MES)	Office 1: Boris Trajkovski street 7, No.9A Office 2: Arhimedova 5 1000 Skopje Tel: (02) 2402 773 Fax: (02) 2402 774 Mob: 078/ 371-175 contact@mes.org.mk
The Ecologists' Movement of Macedonia (DEM) – Skopje	Vasil Gorgov 39/6, 1000 Skopje Tel: (02) 3220-520 dem@dem.org.mk , ruska@dem.org.mk
Centre for environmental research and information "Eko-svest" – Skopje	Blvd Sv. Kiril i Metodij 30/1-6, 1000 Skopje tel: (02) 3217-247 fax: (02) 3217-246 mob: 072 726-104 info@ekosvest.com.mk
Front 21/42	Kliment Ohridski 54-2/2, 1000 Skopje Tel/Fax: (02) 3122-546 mob: 075 433-231 contact@front.org.mk
Go Green	Kukushka 4A 1000 SKopje Tel: 02/3112-606 info@bidizelen.org