

Gas interconnector North Macedonia - Greece

**Cost Benefit Analysis,
Environmental and Social Impact
Assessment and
Basic (detailed) Design**

Stakeholder Engagement Plan

February 2021

**Technical Assistance to connectivity in the Western Balkans
EuropeAid/137850/IH/SER/MULTI**



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List of Abbreviations

Abbreviation	Meaning
CONNECTA	Technical Assistance to Connectivity in the Western Balkans
EBRD	European Bank for Reconstruction and Development
EHSS	Environmental, Health and Safety and Social
EIA	Environmental Impact Assessment
EIB	European Investment Bank
EPR	Environmental Protection Report
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
GR	Greece
HSP	Health and Safety Plan
LAF	Land Acquisition Framework
NER	National Energy Resources JSC Skopje
MKD	North Macedonia
MOEPP	Ministry of environment and physical planning
Mott MacDonald-CONNECTA Consortium	The Consortium carrying out the present project
NGO	Non-governmental Organization
NTS	Non-Technical Summary
PAP	Project Affected People
SEP	Stakeholder Engagement Plan
TA	Technical Assistance
WBIF	Western Balkans Investment Framework

1 Synopsis

Project Title:	TA to Connectivity in the Western Balkans (CONNECTA)
Project Number:	Europe Aid/137850/IH/SER/MULTI
Sub-project Title	Cost Benefit Analysis, Environmental and Social Impact Assessment and Basic Design for the gas interconnector Republic of North Macedonia – Greece
Sub-project Number:	CONNECTA-ENE-INFR-MKD-CBA+ESIA+BD-03
Contract number:	2016/382-382 plus 2018/402-907 – Addendum No 1
Contracting Authority:	European Commission, DG NEAR
Beneficiaries:	Albania, Bosnia and Herzegovina, North Macedonia, Montenegro, Serbia and Kosovo*
Region:	South Eastern Europe (SEE)
Contractor:	Mott MacDonald Romania Srl in Consortium with WYG SAVJETOVANJE d.o.o., COWI A/S, CeS COWI d.o.o. (renamed CESTRA d.o.o.), TRENECON Consulting & Planning Ltd and SYSTEMA Consulting SMLTD
Contract signed:	19 December 2016
Full Mobilisation of 3 KE:	20 January 2017 (date of Kick-off Meeting in Brussels)
Project Duration:	72 months
Anticipated completion:	31 December 2022
Contractor's Project Director:	Wim Verheugt In the contract, Andrei Penescu is mentioned as Project Director but during the contract signature DG NEAR was informed of the change to Wim Verheugt
Project office:	Kneginje Zorke 2, 1st floor, 11000 Belgrade, Serbia
Telephone:	+381 (0) 11 308 22 97

* This designation is without prejudice to positions on status, and is in line with UNHCR 1244 and the ICJ Opinion on Kosovo declaration of independence

2 Forward

The EU funded CONNECTA program¹ is a special technical assistance facility for transport and energy project preparation and serves as a "rapid reaction force", to finalize smaller remaining parts of TA to quickly mature the project, so that an application can be submitted for an investment grant from the WBIF.

With the purpose of realization of the project "Gas Interconnector MKD – GR", NATIONAL ENERGY RESOURCES Skopje (hereafter "NER") has submitted a Technical Assistance (TA) request to CONNECTA. The TA request concerned the elaboration of an Environmental and Social Impact Assessment, a Cost Benefit Analysis and a Basic (detailed) Design for the pipeline section located in North Macedonia (hereafter "the Project").

The implementation of the gas interconnector between North Macedonia and Greece, will interconnect the existing and planned gas transmission system of the two countries and will represent a new gas supply route for North Macedonia. The main promoters, beneficiaries and counterparts are the NER JSC and the Hellenic Gas TSO, DESFA S.A.

NER, is a Joint Stock Company for performing energy activities in North Macedonia, with the purpose of realization of the national gasification strategy of the country. DESFA S.A. is the gas transmission operator in Greece, responsible for the operation, management, exploitation and development of the national natural gas system and its interconnections.

This Stakeholder Engagement Plan (SEP) has been developed by the Mott MacDonald CONNECTA Consortium and is part of the TA request related to the project reference CONNECTA-ENE-INFRA-MKD-CBA+ESIA+BD-03, "CBA, ESIA and Basic (detailed) Design for the gas interconnector MKD – GR", which was approved on 7 January 2019.

This report outlines the approach and actions NER and the Project contractor (hereafter the "Contractor") will undertake for engagement with external and internal stakeholders and local communities in connection with the implementation of the Project. The SEP also includes a grievance mechanism for stakeholders and people to raise their concerns about the Project. The SEP shall be a live document, updated periodically by NER.

Stakeholder engagement is an on-going process involving the public disclosure of appropriate information in order to enable meaningful consultations with stakeholders and consultations with potentially affected parties in a procedure or policy by which people can make comments or complaints.

This process should begin at the earliest stage of the Project planning and continue throughout its life. It should be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format.

¹ The CONNECTA facility has been established with the aim to improve infrastructure across six Western Balkan countries: Bosnia & Herzegovina, Serbia, Albania, North Macedonia, Montenegro and Kosovo.

3 Project Location

The gas interconnection pipeline between North Macedonia and Greece will be 126 km long, where 70 km is on the side of North Macedonia while 56 km is on the side of Greece.

In North Macedonia, the starting point is the border with Greece near the village of Idomeni (GR) and the town of Gevgelija (MKD), where the Greek part of the gas pipeline will end. The ending point is the already built valve station (block station BS 7) on the newly built gas pipeline Shtip-Negotino, near the town of Negotino.

The gas pipeline route passes through the municipalities of Gevgelija, Bogdanci, Demir Kapija and Negotino. The surface of the ambit is 168,53 ha.

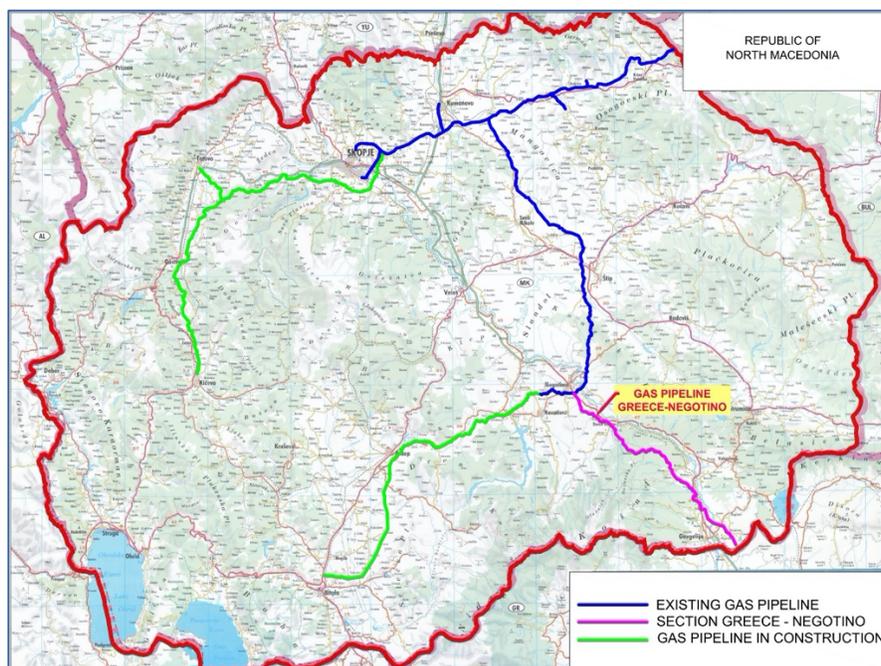


Figure 1: Location of the gas lines in Republic of North Macedonia

3.1 Project characteristics and construction phases

3.1.1 Technical characteristics

The interconnected gas pipeline comprises of:

- Border Metering Station (BMS) close to the border, on Greek territory;
- Scraper Stations allowing the full-length cleaning and controlling (by intelligent pigs) of the pipeline;
- Two Block Stations;

- The Pipeline, 28”;
- Pressure Reduction Stations;
- Cathodic protection system;
- Electrical Substations; and
- Telecommunication network

3.1.2 Description of the construction process

The gas pipeline starts at the border with Greece near the city of Gevgelija. The length of the gas pipeline is approximately 65 km and it is projected to cross major roads, motorways, railways, seismic faults, overhead electricity transmission lines, other major pipelines, rivers, creeks, canals and other utilities. In addition, there will be constructed a scraper station, two block stations, pressure reduction stations, a cathode protection system, electrical substations and telecommunications network.



Figure 2: Construction phase of a pipeline (descent of the pipeline)

The construction phase of the gas pipeline consists of the activities described below.

- Right of Way (RoW)

The width of the area required for pipeline construction (also referred to as the working strip/corridor) will vary according to site-specific conditions. In general, the construction RoW will be 25 meters wide, 12.5 meters on each side of the axis.

Preparation of the RoW will consist of clearing and grading. The clearing will include removal of all structures, trees, bush, crops and boulders within the RoW made available by the owner. Tree stumps and roots in the ditch line, which will interfere with operation of the ditching machine, will also be removed.

- Top soil stripping

The top soil will be removed within the width of the working strip carefully trying not to demolish the structure of the top-soil by start using excavators with flat and wide buckets to lift off the topsoil and store it on the side of the working strip. If the topsoil requires long term storage, then seeding of deep-rooted plants will be carried out.

- Grading

Typically, equipment such as bulldozers and motor graders provide a working corridor to the width of the construction easement in order to furnish efficient working space for all the crews that will follow.

The work pad will resemble an unpaved road. However, the grading will be less than that needed for a road as construction equipment can negotiate steeper and more uneven terrain than passenger vehicles. The cuts in the graded areas will be kept to a minimum to facilitate restoration of the corridor at the completion of the construction period.

- Trenching

The pipeline trenching is to a minimum depth of 1.7 m. The trenching equipment will consist of a trenching machine or excavator, a diesel refuelling truck, and a maintenance pickup. Several trenching machines will be employed at the same time. Trackhoe equipment will be used to dig the ditch in hilly terrain. Extra ditch depth will be excavated to accommodate the transition of the pipeline at the bottoms and tops of hills, river crossings, road crossings, and railroad crossings.

Materials removed from the ditch will be placed adjacent to the topsoil pile in areas where topsoil management is applicable. Generally, rock will be dug out using a jack-hammer, however, if blasting is required, the charges will be shaped to limit the amount of outward explosion. It is possible that dewatering of the trench maybe required if the ground is very wet. Water will be directed to streams, rivers or irrigation ditches and this will be undertaken in agreement with the relevant authorities.

- Pipe stringing

Pipe stringing may occur concurrently with trenching. In some cases, pipe stringing precedes trenching. Where river/stream and road crossings are to be accomplished, the appropriate pipe will be stockpiled on the side of the crossing where the construction crews executing the cross-section are located. Depending on access and terrain, the trucks will off-load the pipe and then return to the pipe lay-down area. In cases where there is a narrow construction corridor, the trucks will have to make a continuous loop by driving a significant distance up the corridor, off-load the pipe, and follow the corridor a significant distance to exit. If access is very limited, the pipe will be hauled up the corridor by tractor and trailer and unloaded along the trench line.

- Bending

Before the pipe is prepared for welding, a bending crew will bend the pipe in place where necessary to match the contours of the ditch. The crew will use a hydraulic bending machine to put gradual bends in the pipe. The bending will be limited to making many small bends along the length of a pipe section until the desired bend angle is obtained. The pipeline centreline will be surveyed with bending limitations in mind. Where the bend cannot be made gradually at the required level in order to meet specific conditions, a preformed factory bend will be inserted into the pipeline. These conditions will be identified prior to the construction.

- Pipe welding

The welding crew is the largest workforce crew. The crew will consist of a number of welders using automatic welding machines or semi-automatic welding machines mounted on pay welders and/or tractors. The welding crews will follow and place the remainder of the weld material into the joint prior to the final pass. A capping crew will follow immediately to put the finish “cap” weld on the joint when completed. All welders that work on a joint have unique identifying codes. The codes are marked on the area adjacent to the pipe so complete records of the welding will be maintained.

Each individual welder will be qualified and a Welder Qualification Record (WQR) is generated to document the process.

- Radiography (Non-destructive testing)

Shortly after the welding crew has completed its task, an independent X-ray crew will test the welds. Each constructed weld is inspected by radiography. All of the radiographs are examined by an independent ASTM Level II Radiographer and evaluated according to API 1104 for welding flaws or pipe defects. The process is repeated for any radiographs of welds with questionable quality. Any welds indicating defects will be flagged for repair.

- Joint coating

After the welds have been checked and tested, the coating crew will clean the exposed steel section at the joint between the pipes, sand-blast the steel and apply a protective epoxy layer to it. The coating will be a heat-shrinkable polyethylene sleeves around the pipe. Heat will be applied to the coating material to shrink it around the joint and form a tight, impervious covering on the joint. After the joints have been coated, an inspection crew will check the pipe for nicks, abrasions in the coating with a high-voltage testing device (holiday detector). Chips or abrasions in the coating will sound an alarm on the test equipment, and the crew will place a mark on the pipe to indicate the defect. Repair crews will patch the defects prior to lowering the pipe into the ditch.

- Pipe lowering in

A team of side boom operators will raise off the skids lowering the pipe into the ditch. All rock will be removed from the ditch prior to the lowering-in operation. In areas of rocky terrain, soil, sand or other material will be placed in the bottom of the ditch to protect the pipe from the rocky bottom. If appropriate, heavy duty plastic mesh (rock-shield) will be wrapped around the pipe in rocky areas to protect the pipe and coating from damage during the lowering process. Before and after the pipe section is lowered down into the trench, bottom detection tests of the insulation will take place. After the pipe is laid in the trench, the wooden skids or sand bags will be picked up and moved ahead for the line-up crew to reuse. All other debris will be removed from the site and the trench will be inspected to ensure that no debris has fallen into the trench.

- Backfill

Backfill take place over the pipeline, within a week of the pipe being lowered into the trench. Warning tapes will be put on place to inform about the works that will occur. Bulldozers will push the stockpiled materials removed from the ditch back into the ditch to cover the pipe. In areas that contain large quantities of rock, selected fill material may be imported to put the first layer of cover over the pipe, or special padding machines may be brought in to screen the rock from the backfill before it is placed in the ditch. Extreme care will be taken with the initial fill to avoid damage to the

coating during backfill. After the initial layer of screened material is placed on the pipe, the remaining soil and rock mixture will be returned to the open ditch to complete the backfill.

- Tie in

In order to tie pipe strings together, the backfilling crew will leave a significant portion of the end of the pipe string exposed. The second string is lowered into the trench so that it overlaps the backfilled pipe. The ends of the pipe are lifted, cut to fit, re-bevelled, externally clamped in position, and then welded together. The welds are radiographed while still exposed and then coated after being accepted by radiography. The pipe is then properly aligned in the ditch and the backfill completed.

- Clean up and restoration

After backfill is completed and all sections within a given length of pipeline have been welded together, the restoration operation will begin. Material that was pushed aside to make the temporary level working area will be placed back on the right-of-way. The original contours of the land will be restored as closely as possible. As part of the restoration process, all equipment used for access crossings will be removed.

- Pipeline commissioning

Before hydrostatic testing, brush pigs will be blown through the pipe in segments to remove any debris that may have accumulated during construction.

Several of the clean sections will be welded together to form a hydrostatic test section. The entire pipeline will be hydrostatically tested in sections and if leaks are detected, they will be repaired and the sections will be retested.

- Construction of ground structures

The construction of the gas pipeline requires construction of ground structures, such as Scraper Stations, two Block Stations, Pressure Reduction Stations and Electrical Substations



Figure 3: Pressure Reduction Stations



Figure 3: Electrical Substations



Figure 2: Block stations



Figure 3: Scraper Stations

- Pipeline hydro testing & final commissioning

Hydro test water will be potable water sourced from a suitable local supply. Immediately following successful completion of the pressure test, the test section will be de-watered using foam/swabbing pigs. The displaced hydrostatic test water may be transferred to another section of pipe or discharged at a suitable location. The disposal procedures for the hydro test water will be in accordance with the Contractor’s waste management plan. The base philosophy is to use potable water where possible, and to re-use water through progressive pipe test sections.

Commissioning of the pipeline, block valve and associated above-ground installations will ensure that the pipeline system has been constructed in accordance with the design and that the system is ready for operation. Commissioning will also ensure that there are no defects in the pipeline system, which could cause problems during start-up or during operation.

3.2 Project Operation

When natural gas is processed, will be transported through the Interconnector natural gas pipeline. Compressor stations are located along the pipeline route where powered compressors move natural gas through the pipeline at around 40 km an hour. Sophisticated sensors along the pipeline route will monitor information like temperature, flow speed and pressure. The information is monitored in real-time from the control room. All pumping stations, remote sensors, maintenance operation, or patrol on the ground is monitored in the control room using usually a SCADA system (Supervisory Control and Data Acquisition). Any changes in regular operation will be detected. All equipment along a pipeline is carefully inspected and maintained – both inside and out. If a defect is found, it is repaired immediately.

Table 3-1: Time plan for the Project phases: ESIA, Project Design, Construction and Operation

Task	2019	2020	2021	2022	2023
ESIA					
Infrastructure Design					
Basic Design					
Construction					
Operation					

4 Objectives of Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) will assist NER with managing and facilitating future engagement through the various stages of the Project's life cycle from design through to construction, and operation.

This SEP details engagement undertaken with stakeholders during the Design stage of the Project and ESIA preparation and serves as a guide to engagement during the Project construction and operation stage. This version of the SEP is an initial guide to engagement and will need to be revised following Project approval to inform ongoing stakeholder engagement through the various stages of Project development, construction, operation.

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of this SEP is to create and facilitate an atmosphere of understanding that actively involves project affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions. The SEP is a useful tool for managing communications between NER and its stakeholders.

The Key Objectives of the SEP can be summarized as follows:

- Understand the stakeholder engagement requirements of national legislation
- Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities
- Identify the most effective methods through which to disseminate project information, and to ensure regular, accessible, transparent and appropriate consultation;
- Guide NER to build mutually respectful, beneficial and lasting relationships with stakeholders and maintaining a social licence to operate throughout the life of the Project.;
- Develops a stakeholder's engagement process that provides stakeholders with an opportunity to influence project planning and design
- Establish formal grievance/resolution mechanisms;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings and

5 Legal and Policy Framework for Stakeholder Engagement

The implementation of the Project will follow the laws and regulations of the Republic of North Macedonia as well as applicable EIB/EBRD policies and standards.

5.1 National legal framework for Stakeholder Engagement

Public disclosure and consultation activities are organized in connection to the preparation of Project documentation and related strategic and other studies, under the following laws:

- The Law on Environment (OG of MKD, no. 53/05, 81/05, 24/07, 159/08, 83/09, 48/10, 124/10, 51/11, 123/12, 93/13, 187/13, 42/14, 44/15, 129/15, 192/15, 39/16, 99/18).

This law and its associated secondary legislation set out the requirements for undertaking environmental impact assessment of potential environmental impacts of public and private projects which are likely to have a significant impact on the environment before development consent / construction permit is granted in the form of approval for project implementation.

In accordance with the Law on the Environment, when an intended project may have a significant impact on the environment in another country, the state authority responsible for environmental protection issues shall promptly submit to another state the information concerning the project, together with all available data on its possible impacts; the nature of the decision that may be adopted; and, the period within which another state can announce its intention to participate in the impact assessment procedure.

Upon the submitted Letter of Intent by the developer, MoEPP has issued Decision on 13.12.2019, and the given Rational of the Decision states: the Project is categorized in the group of projects for which Environmental Impact Assessment is compulsory: Annex I – Point 13 “Pipelines for transport of gas, oil or chemicals with diameter larger than 700mm and/or with length larger than 40km”, and a full-scale EIA process must be carried out.

- The Law on Urban and Spatial Planning (OG of MKD, no. 199/14, 42/14, 44/15, 193/15, 31/16);

This law regulates the system of spatial and urban development of North Macedonia, including public information and participation throughout the process of development and adoption of urban and spatial planning documents.

Other applicable laws which foresee disclosure of project information or enable access to information, including mechanisms for grievances and appeals, include:

- The Law on Construction (OG of MKD no. 130/09, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 70/13, 79/13, 137/13, 150/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 35/18, 64/18).
- The Law on Expropriation (OG of MKD no. 95/12, 131/12, 24/13, 27/14, 104/15, 192/15, 23/16). Under the national legal framework relating to expropriation affected land owners and users with legal rights must be consulted. Affected owners of properties are individually invited to a hearing and notified about the submission of the Proposal for Expropriation and the proposed compensation amount.

- The Law on Access to Public Information (OG of MKD no. 13/06, 86/08, 06/10, 42/14, 148/15).
- The Law on Acting upon Complaints and Proposals (OG of MKD no. 82/08, 13/13, 156/15, 193/15).
- Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, 1998 (Macedonia accessed 22 July 1999).

5.2 EIB and EBRD's policies for Stakeholder Engagement

EIB's Policies on environmental and social aspects protection are based on the EU approach on environmental sustainability. This is reflected in the bases and goals of their Corporate Operative Plan, as well as in the protection of environment and social aspects, in the EIB's Statement on the Principles and Standards of the Environment and Social Aspects. These procedures, principles and standards are translated into EIB's routine practices in the Manual for Environment and Social Practices. EIB uses a large number of basic measures for protection of the social aspects which reflect the international good practices. For all its projects the EIB requires:

- Using references on EU's Law on Environment;
- Compliance with the international conventions and agreements ratified by EU;
- Compliance with the EU's social aspects legislation, as defined in the EIB's Referent Book on EU, Guide for Social Aspects and with the EIB's Guidebook and notes for social aspects;
- Adhering to other specific international good practices for environment and social aspects.

Therefore, the Social Impact Assessment is a part of the process for evaluation and monitoring by the stakeholders and the IFIs. The EIB's Statement on Environment and Social Aspects requires all projects, regardless of the location, to be in compliance with the process and content of the requirements of the EU's EIA Directive.

The projects are categorized in four categories (Cat. A, B, C and D) on the basis of the Bank's standards. This project belongs in Cat. B – projects for which the competent authority determines the need for EIA according to the specified criteria (Annex II of the EU EIA Directive with reference to Annex III of EU EIA Directive) and as described above, according the national legislation. According to the competent authority and national legislation, "Ordinance for determination of projects", this project is categorized in the group of projects for which Environmental Impact Assessment is compulsory: Annex I – Point 13 "Pipelines for transport of gas, oil or chemicals with diameter larger than 700mm and/or with length larger than 40km", and a full scale EIA process must be carried out.

EBRD is committed to promoting environmentally sound and sustainable development in accordance with its Environmental and Social Policy (2014) and the Performance Requirements (PRs) contained therein. This project belongs in Cat. A. according the EBRD environmental and social criteria and full scale ESIA should be carried out.

EBRD sets out its stakeholder engagement requirements in the following documents:

- Environment and Social Policy (2014) through PR 10: Information Disclosure and Stakeholder Engagement (2014); and

- Public Information Policy (2014).

EBRD considers public consultation and stakeholder engagement an on-going process, to be started at the earliest stage of project planning, and to be continued throughout the entire life of the EBRD-financed project.

An essential element in the stakeholder engagement process, in order to ensure meaningful and effective consultation process, is the careful identification of all involved stakeholders and the examination of their concerns, expectations and preferences. Special attention should be paid to the identification of vulnerable stakeholders whose life and well-being is directly dependant by the project implementation. The consultation and dialogue with these stakeholder groups needs to be planned and managed with special care.

Furthermore, the EIB/EBRD policies require that the project developer establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints and concerns are received, handled and resolved effectively, in a prompt and timely manner.

6 Identification of Project Stakeholders

The purpose of identifying stakeholders is to determine the organizations and persons who might be directly or indirectly affected (both positively and negatively) by the Project, as well as parties that might be interested in and/or have a positive or negative influence on the Project.

Stakeholder identification was initiated at the Project planning stage, on the basis of:

- Analysis of information about the affected area;
- Analyses of information about the Municipalities and communities in the Project area;
- Analyses of currently available information about owners and users of land which will be acquired for the Project;
- Consultations with representatives of local authorities;
- Analysis of and consultations with statutory organizations and agencies with responsibilities related to the Project;
- Analyses of local service providers whose assets may be affected by the project and / or who may have to provide services for the project (emergency services, fire brigades, owners and operators of public utilities, local police, etc.);
- Analysis of existing NGOs at the national and local level interested in social and environmental issues, including those that have already shown an interest in the Project through participation in meetings and communication with NER;
- Analyses of NER internal stakeholders (employees and their union, contractors, etc).

Stakeholder engagement activities will be ongoing through the course of the Project's phases: pre-construction, construction, operation and closure. Table 1 in Chapter 6 "Information Disclosure and Stakeholder Engagement Plan" provides an overview of stakeholders identified to date, as well as the type and method of communication which will be used with each one of them and will be the responsibility of NER, in cooperation with the Contractor.

The stakeholders and vulnerable groups identified during the ESIA Scoping phase, have as follows:

- Municipalities of Gevgelija, Demir Kapija, Negotino and Bogdanci, (including relevant departments);
- Centres for Regional Economic Development;
- Communities along the gas pipeline;
- Project Affected People and residents along the alignment of the gas pipeline (*Other vulnerable groups will be added as identified through project development process*);
- Ministries (Ministry Environment and Physical Planning, Ministry of Transport and Communication, Ministry of Culture and Cultural Heritage, Ministry of Finance, Ministry of Economy, Ministry of Agriculture, Forest and Water Management etc);

- Institutions for preserving cultural monuments and Museums (Directorate for Protection of Cultural Heritage, Skopje, NI Institute for Protection of Cultural Monuments and Strumica Museum);
- Local emergency services, fire brigades, utility owners and operators, local police, public utility company;
- NGOs, citizens' associations (*Indicatively: Macedonian Ecological Society, Bird Study and Protection Society of North Macedonia, National Federation of Farmers, Association for Emancipation, Solidarity and Equality of Women ESE, National Association of Persons with Disability, Automotive Association of Republic North Macedonia*)
- Bureau for Regional Development, Republic of North Macedonia
- Local and regional businesses;
- Contractors for construction (construction companies, subcontractors and suppliers etc.);
- NER's employees;
- Relevant International Financial Institution;

6.1.1 Government Officials

The Government of North Macedonia consists of a parliamentary representative democratic republic, whereby the Prime minister is the head of government, and of a multi-party system. Executive power is exercised by the government. Legislative power is vested in both the government and parliament. The Judiciary is independent of the executive and the legislature.

The principal government departments that will be consulted include:

Ministry Environment and Physical Planning, Ministry of Transport and Communication, Ministry of Culture and Cultural Heritage, Ministry of Finance, Ministry of Economy, Ministry of Agriculture, Forest and Water Management, Ministry of Interior of the RM – Sector Telecommunications, Ministry of Defense, Gevgelija Municipality, Bogdanci Municipality, Demir Kapija Municipality, Negotino Municipality, National Conservation Centre and Museum Strumica, Protection & Rescue Directorate- Gevgelija, Negotino, Kavadarci, Greek Government.

Public enterprises and agencies include:

Agency for Electronic Communications, Civil Aviation Agency, Water management company, TIRZ (Free Zones Authority), PE Macedonian Railways – Infrastructure, PE for State Roads, PE Macedonian Forests, Makedonski Telekom AD, MEPSO AD- Skopje, ELEM, EVN – Macedonia AD Skopje, GA – MA, PE Komunalec – Gevgelija, PE Boshava.

This list will be amended and expanded on as the Project progresses.

6.1.2 Impacted Communities

Impacted communities are groups of people who can be directly or indirectly (positively or negatively) affected by a project. An impacted community may be affected through components of the natural or social environment as a consequence of various aspects of a project and in varying degrees over its life cycle. To ascertain which communities are impacted and the level of impact, the different studies have firstly established the area of influence of the Project. As such, the primary area of influence of the project are Municipalities within which the proposed project will be located. Within this primary area of influence some communities will experience more direct impacts (positive and negative) as a consequence of their vicinity to the proposed project site. These communities are presented in the table below. Other villages within the primary area of influence may also experience impacts (positive and negative), however to a lesser degree and the impacts will be predominantly indirect.

The following settlements have been identified as being directly affected within primary area of influence of Municipalities, namely:

- Cities: Negotino, Demir Kapija, Gevgelija and Bogdanci
- Villages: Timjani, Tremnik, Przdevo, Chiflik, Dren, Petrovo, Gabrovo, Smokvitsa, Mrzentsi, Negotisi, Miravci, Miletkovo, Prdejtsi, Gjavato, Stojakovo, Bogoroditsa, Selemli.

The secondary area of influence, is considered the broader geographic area within which Municipalities are located and consists of Vardar Region and South-East Region.

6.1.3 NGO and Conservation Organisations

NGO and Conservation organisations which have been identified include:

Macedonian Ecological Society, Bird Study and Protection Society of North Macedonia, National Federation of Farmers, Association for Emancipation, Solidarity and Equality of Women ESE, National Association of Persons with Disability, Automotive Association of Republic North Macedonia, Bank Watch, Citizens Association “EKOVIDA” – the municipality of Negotino, Ecologists Association “Zrak” – the municipality of Bogdanci, Association for development, education and ecological ethics “Polimat 13” – the municipality of Bogdanci, Association “Eko-Kocka” – the municipality of Demir Kapija, Citizens Association “Ekoloshko drushtvo Eko Chiflik” – the municipality of Demir Kapija, Citizens Association “Centar za klimatski promeni” – the municipality of Gevgelija.

This list will be amended and expanded on as the Project progresses.

6.1.4 NER’s employees

NER will strengthen their organization to manage stakeholder consultation with Community Liaison Senior Officer and Community Liaison Officers, address grievances, to minimize any potential impacts identified in the ESIA study.

It is important that employees of NER are included in the consultation and engagement processes. By consulting personnel, it is possible for project consultants to communicate accurate information regarding Project activities, company recruitment policies and procedures, worker health and safety procedures.

6.1.5 Vulnerable Groups

The vulnerable groups within the Project area of interest can be grouped into categories of elderly, youth, women, unemployed, Roma minority group and those people with disabilities. Attendance will be encouraged at consultation meetings and certain additional measures will be put in place to encourage participation such as focus group meetings with additional assisted transport to meetings for elderly and people with disabilities, and also focus group meetings in a language of their understanding.

7 Information Disclosure and Stakeholder Engagement Program

7.1 Project information disclosure and consultations

NER intends to provide all relevant information to the public during Project development phase and design, and following also during construction and operation phase. All interested and affected parties will be able to find the documents listed below on the NER website (www.mer.com.mk). Documents will be available in Macedonian and English language, as follows:

- Non-Technical Summary;
- Stakeholder Engagement Plan including Grievance Mechanism;
- Land Acquisition Framework;
- Environmental and Social Impact Assessment Study.

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

- NER premises in Skopje [Blvd. Sveti Kliment Ohridski 58 B, 1000 Skopje];
- Municipality building along the alignment of the gas pipeline in Gevgelija, Demir Kapija, Negotino and Bogdanci;
- The Delegation of the European Union to the Republic of North Macedonia.

7.2 Other disclosure and consultation activities

The Contractor will secure sites prior to any construction activities taking place and will ensure that appropriate construction and warning signs are in place. Information in relation to the Grievance Mechanism will also be included.

7.3 Stakeholder Engagement throughout the life of the Project

NER and the Contractor will continue to engage with stakeholders and this Stakeholder Engagement Plan will be frequently updated to reflect Project progress and continue during construction and operation. Particular attention will be placed on communication with any identified vulnerable groups (through focus group meetings, project leaflets or in other appropriate ways), to ensure project impacts on them are appropriately mitigated.

Detailed program with communication methods and timing of engagement with Stakeholders is presented below:

Table 7-1: Proposed Stakeholder Engagement Program

Stakeholders	Activity	Method	Timing
Pre-construction Phase			
<ul style="list-style-type: none"> • Municipalities of Gevgelija, Demir Kapija, Negotino and Bogdanci, (including relevant departments) • Centers for Regional Economic Development, Vardar region and South-East Region • Communities and villages along the gas pipeline Timjanik, Tremnik, Przdevo, Chiflik, Dren, Petrovo, Gabrovo, Smokvitsa, Mrzentsi, Negortsi, Miravci, Miletkovo, Prdejtsi, Gjavato, Stojakovo, Bogoroditsa, Selemli 	<ul style="list-style-type: none"> • Promotion of Project timeline and activities, Stakeholder Engagement Plan, Land Acquisition Framework, Non-Technical Summary and Environmental and Social Action Plan • Separately, these stakeholders will also be engaged by the Contractor during their development of the H&S Plan and Construction Site Management • Discussion regarding health and safety management and measures 	<ul style="list-style-type: none"> • Information through the local and national media: newspaper(s), radio as well as electronic media • Disclosure of Information about the Project (NTS, ESIA, and SEP) published on Investor's website: www.mer.com.mk, and hard copy printed grievance forms to be readily-available to the public • Communication through bulletin boards at key public locations (located in affected municipalities) by posting project information/ notices; Construction signs and warnings • Public consultation meetings, individual meetings and face to face discussions • Official correspondence and regular meetings to provide information on Project progress and issues raised to that concern local community 	<ul style="list-style-type: none"> • Public consultation, meeting, one in each municipality (total 4), to be preceded by disclosure of the NTS, ESIA and SEP. Period from March to May 2020. • Consultation in the Centres, one time in each region, from March to May 2020. • Communities and villages will be visited 3 times during the period from March to May 2020.
<p>Project Affected People with respect to land acquisition (area users and owners): Local Communities/ Residents along the alignment of the gas pipeline</p> <p><i>(Other vulnerable groups will be added as identified through project development process)</i></p>	<p>Discussion and update on land acquisition and timeline.</p> <p>Meetings to determine sensitive time for community with aim to avoid it working during that time and confirm any impacts on local access during construction and operation.</p>	<ul style="list-style-type: none"> • Information through the local and national media: newspaper(s), radio as well as electronic media • Information about the Project (NTS, ESIA, and SEP) published on Investor's website: www.mer.com.mk • Public consultation meetings, individual meetings for directly project affected people (PAP) 	<ul style="list-style-type: none"> • In line with the timeline set out in the LAF, Public consultation, meeting in each municipality, 2 times, in period from July to October 2020.

Stakeholders	Activity	Method	Timing
	<p>Consultation with affected persons on the expropriation process and sharing pamphlets and posters, and information on the Grievance Mechanism.</p>	<p>with respect to land acquisition and face to face discussions to identify impacts, agree and implement mitigation measures, project leaflets, as necessary</p> <ul style="list-style-type: none"> • Official correspondence and regular meetings 	
<ul style="list-style-type: none"> • Ministry of Environment and Physical Planning • Ministry of Transport and Communication • Ministry of Culture and Cultural Heritage, Ministry of Finance • Ministry of Agriculture, Forest and Water Management • Ministry of Economy <p><i>(other Ministries to be added to this table as the need for any further communication arises)</i></p>	<ul style="list-style-type: none"> • All required permit(s) and approvals (Construction Permit, Approval on ESIA etc) • Land acquisition and statutory reporting 	<ul style="list-style-type: none"> • Official correspondence and meetings • Permit applications 	<p>As needed throughout Project implementation</p>
<ul style="list-style-type: none"> • Institutions for preserving cultural monuments and Museums • Directorate for Protection of Cultural Heritage, Skopje • NI Institute for Protection of Cultural Monuments and Strumica Museum 	<ul style="list-style-type: none"> • Chance Finds <i>(i.e. an archaeological deposit or other religious or ecological finds and features becoming exposed during earthmoving and ground altering activities associated with a project)</i> 	<ul style="list-style-type: none"> • Official correspondence • Review and approval of the developed Chance Finds Procedure • Consent on the Chance Finds Procedure • Consent on a procedure for identification and conservation of local cultural heritage during construction. The museum has a permanent ethnological setting, library, archive and one expert 	<ul style="list-style-type: none"> • Prior to construction commencement. • Throughout project implementation
<ul style="list-style-type: none"> • Local emergency services, fire brigades, utility owners and 	<ul style="list-style-type: none"> • Discussion of Project Environmental and Social Management and Monitoring Plans to prepare for and 	<ul style="list-style-type: none"> • Official correspondence and regular meetings to provide information on Project progress and address issues that concern local communities, for 	<ul style="list-style-type: none"> • At least six weeks prior to construction commencement

Stakeholders	Activity	Method	Timing
<p>operators, local police, public utility company</p>	<p>coordinate activities during construction</p> <ul style="list-style-type: none"> The Project Environmental and Social Management and Monitoring Plans will be shared with emergency services and local utility companies. Timing of advance notice requirements to emergency services and utility companies for specific construction activities to be agreed. 	<p>example issues in relation to water supply and waste management</p> <ul style="list-style-type: none"> Official correspondence and regular meetings to prepare for and coordinate activities during construction 	<ul style="list-style-type: none"> During construction and in operational phase
<ul style="list-style-type: none"> Interested NGOs, citizens' associations and other organizations <p><i>(Other interested organizations will be added as identified through Project development process)</i></p>	<ul style="list-style-type: none"> Promotion of Project timeline and activities Stakeholder Engagement Plan, Land Acquisition Framework, Non-Technical Summary and Environmental and Social Action Plan 	<ul style="list-style-type: none"> Information through the local and national media: newspaper(s), radio as well as electronic media Disclosure of NTS, LAF and SEP on NER website: www.mer.com.mk Individual meetings and official correspondence as needed (none planned at this time based on current needs) 	<p>Public consultation, meeting, one in each municipality (total 4), to be preceded by disclosure of the NTS, ESIA and SEP. Period from March to May 2020.</p>
Construction Phase			
<ul style="list-style-type: none"> Residents, businesses and Municipalities connected to the Project footprint 	<ul style="list-style-type: none"> Promotion of Project timeline and activities Ongoing promotion of Stakeholder Engagement Plan and its implementation, including grievance mechanism Advertisement of employment opportunities 	<ul style="list-style-type: none"> Information through the local and national media: newspaper(s), radio as well as electronic media, particularly of employment opportunities Individual meetings and face to face discussions, as needed Semi-annual stakeholder engagement monitoring reports on the NER website, in hard copy in the municipal offices, and provided in person / by mail as needed, including details of issues raised during the consultation process, the number of grievances received 	<p>Duration of Project construction</p>

Stakeholders	Activity	Method	Timing
		<p>and addressed/ closed, most frequent types of grievances, and any recommendation or action taken to decrease the number of grievances</p> <ul style="list-style-type: none"> • Continuous communication through the bulletin boards at key public locations (located in affected municipalities) by posting project information/ notices; Construction signs and warnings • Focus group meetings to identify impacts, agree and implement mitigation measures, project leaflets, as necessary, as needed (none anticipated to be needed at this time) • Official correspondence as needed (none anticipated to be needed at this time) 	
<ul style="list-style-type: none"> • Local emergency services, fire brigades, utility owners and operators, local police, utility companies connected to Project footprint 	<ul style="list-style-type: none"> • Discussion of Project Environmental and Social Management and Monitoring Plans and continuous coordination during construction • Emergency services to continue to have access to the H&S Management Plan of the Contractors 	<ul style="list-style-type: none"> • Official correspondence and meetings as needed 	<ul style="list-style-type: none"> • Throughout construction • Timing of advance notice to emergency services of specific activities as agreed during pre-construction meetings
<ul style="list-style-type: none"> • NGOs, citizens' associations and other organisations (see Annex 2). 	<ul style="list-style-type: none"> • Promotion of Project timeline and activities • Ongoing promotion of Stakeholder Engagement Plan and its implementation, including grievance mechanism 	<ul style="list-style-type: none"> • Information through the local and national media: newspaper(s), as well as electronic media • Semi-annual stakeholder engagement monitoring reports on the NER website and provided in person / by mail as needed • Individual meetings and correspondence as needed 	<ul style="list-style-type: none"> • Duration of construction, no specific requirements at this time

Stakeholders	Activity	Method	Timing
<ul style="list-style-type: none"> Contractors (construction companies, subcontractors and suppliers) 	<ul style="list-style-type: none"> Project progress updates, oversight 	<ul style="list-style-type: none"> Official correspondence, site visits, regular communication (phone, e-mail or meetings) 	<ul style="list-style-type: none"> Throughout construction, at least monthly and up to weekly during works in or adjacent to priority biodiversity features, including all watercourse crossings
<ul style="list-style-type: none"> NER employees 	<ul style="list-style-type: none"> Employee awareness of Project requirements 	<ul style="list-style-type: none"> Individual meetings or internal workers' meetings as needed, newsletters, bulletin boards, information from managers including on the following: <ul style="list-style-type: none"> → roles and responsibilities → human resources policy → internal grievance mechanism → health and safety procedures → codes of conduct → environmental and social mitigation measures → grievance mechanism 	<ul style="list-style-type: none"> Throughout construction, as needed
<ul style="list-style-type: none"> Area users 	<ul style="list-style-type: none"> Update on Project plans and timelines 	<ul style="list-style-type: none"> Information through media: newspaper(s), as well as electronic media 	<ul style="list-style-type: none"> Throughout construction
<ul style="list-style-type: none"> Relevant International Financial Institution 	<ul style="list-style-type: none"> Project progress reporting 	<ul style="list-style-type: none"> Annual EHSS Report 	<ul style="list-style-type: none"> Annual
Operation Phase			
<ul style="list-style-type: none"> NER 	<ul style="list-style-type: none"> NER's engagement 	<ul style="list-style-type: none"> Official correspondence, meetings 	<ul style="list-style-type: none"> Prior to operation start
<ul style="list-style-type: none"> Municipalities connected to the Project footprint, interested NGOs, citizens' associations and other organisations (see Annex 2). NER employees. 	<ul style="list-style-type: none"> Promotion of monitoring plan and results, Operational Environmental and Social Management Plan 	<ul style="list-style-type: none"> Disclosure of monitoring plan and results on NER website: www.mer.com.mk Individual meetings and face to face discussions as needed Official correspondence as needed 	<ul style="list-style-type: none"> Disclosure semi-annually for the first two years of operation
<ul style="list-style-type: none"> Local emergency services, fire brigades, utility owners and operators, local police, 	<ul style="list-style-type: none"> Discussion of Project plans for operation and ongoing interaction as needed 	<ul style="list-style-type: none"> Official correspondence and meetings as needed (none) 	<ul style="list-style-type: none"> During operation

Stakeholders	Activity	Method	Timing
utility companies responsible for the Project footprint	for operational management per the operational emergency response plan	known to be required at this time)	

7.4 Stakeholder Engagement to date - current development

The meetings and consultation with Governmental institutions, organizations and community were held in order to present project details, environmental and social issues, and the Project time plan.

Governmental institutions, Public and State organizations

In October 2019 in the premises of MoEPP, a consultative meeting was held between the representatives of the MoEPP – Sector for EIA (competent authority for permitting procedures). The issues discussed were:

- Consideration of analyzed alternatives
- Avoiding protected areas, opportunities and ways of avoiding protected areas
- Landscape and visual impact on near protected areas important for promoting ecotourism as well as biodiversity
- Biodiversity and appropriate impact mitigation
- Areas of conservation or biodiversity significance, challenges and avoidance with necessary alternatives
- Harmonization with the findings of the Strategic Environmental Assessment in the energy sector
- The importance of obtaining information on other existing infrastructure, access roads, agricultural roads and protected areas
- The database of natural heritage is currently being reviewed and updated – additional consultation and outreach by field experts is needed.

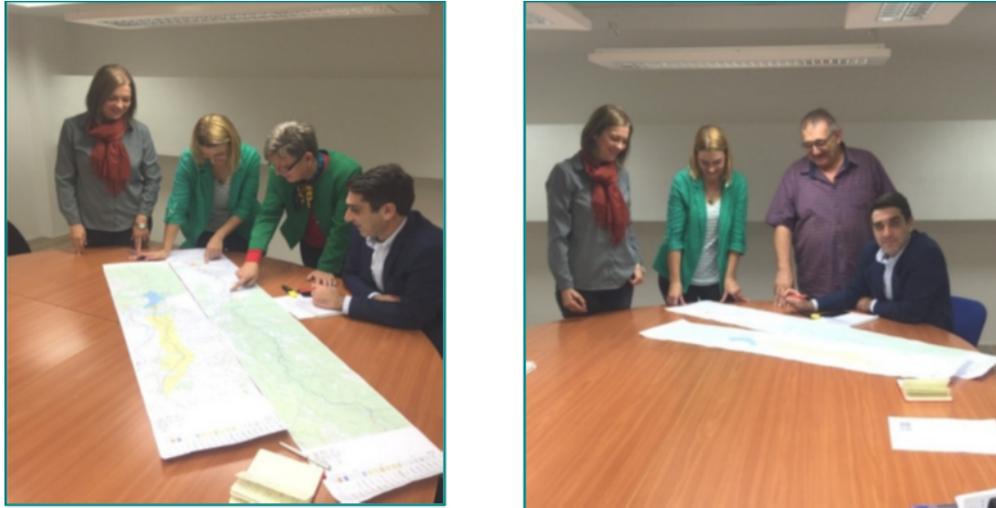


Figure 7-1: Meeting with representatives of MoEPP

Additionally, official written communication was conducted with public enterprises and agencies with goal of to inform about the Project and Project area, and obtain formal opinion about possible influence with their projects and plans.

The following public enterprises and agencies were communicated: Ministry of Transport and Communication, Ministry of Culture and Cultural Heritage, Ministry of Finance, Ministry of Economy, Ministry of Agriculture, Forest and Water Management , Ministry of Interior of the RM – Sector Telecommunications, Ministry of Defense, National Conservation Centre and Museum Strumica, Protection & Rescue Directorate- (Gevgelija, Negotino, Kavadarci).

Local Government units and community

Meetings and consultations with representatives of the four municipalities where the gas pipeline route is crossing, Municipality of Negotino Municipality of Demir Kapija, Municipality of Gevgelija and Municipality of Bogdanci, were held in October 2019 and February 2020.

On the meetings, the Project details were presented as well as the permitting process and the scope of environmental and social impact assessment. Further, the meetings were used to inform municipal representatives about the gas pipeline alignment, the technical features and Project components. The following issues were discussed:

- Need and purpose of the project;
- Details of the pipeline route and stations location;
- Community and municipal benefits;
- Access and land acquisition.

Representatives of the Department for Local Economic Development (LED), Department of Energy, Department of Urban Planning and Environment, Department of Social Protection and Primary Health Care, as well as Municipal Mayors attended the separate meetings in each Municipality.

The key questions asked or requests during these meetings were:

- More details on the pipeline route and location of pipeline facilities;
- Impacts on the environment, health and safety of the population ensuring a safe distance from housing;
- Interest in the land compensation process, especially project timing and procedure;
- If there will be opportunities for development and assistance for a secondary gas distribution network related to connection and cost issues and Community Benefits for potential future users;
- Request for the link between the gas pipeline and other projects in the municipality as well as cumulative impacts;
- Determining the width of the pipeline protection area (corridor);
- Recommendation to the Investor to consider underground cables and other infrastructure at sites close to settlements;
- Requests from the municipality to be informed and to know in advance the alignment of the pipeline route so they can plan the development of the area and discuss and inform the landowners;
- Access to land and possible adverse social and economic impacts and prevention.

During the meetings, the municipal officials expressed their interest and support for the development of the Project. Communication and sharing the necessary data including coordination between the municipalities and the project development team was identified assuring proper and efficient development of the ESIA and other supporting documentation for Project development. Below are photos from the meetings as part of the ESIA Scoping process:

In the period autumn and winter 2019, a number of places within the Project area were visited and consultations were undertaken with stakeholders residing in these villages, and discussions took place with community representatives and leaders.

The purpose of these interviews was to understand the potential project area of influence and the potentially impacted stakeholders, to gather rich local level insights and a clear picture of the perceptions of the potential impacts of the project as perceived by stakeholders. Interview notes were taken and the format of the interviews was informal. Residents express support for the project, and interest about possible connection to secondary gas distribution network and usage, and time plan for the project



Figure 7 2: Meetings and consultations with representatives of the municipalities through which the gas pipeline passes



Figure 7 3: Meetings and consultations with representatives of the community through which the gas pipeline passes

Non-Governmental Organizations

The Non-Governmental Organizations were informed via email correspondence that development of the project documentation (Basic Project Design) and the Environmental Impact Assessment Study for “North Macedonia – Greece Interconnection Natural Gas Pipeline” are underway and the responsible organization for its development is JSC NER. The list of contacted Non-Governmental Organizations is the following:

- Citizens Association “EKOVIDA” – the municipality of Negotino;
- Ecologists Association “ZRAK” – the municipality of Bogdanci;
- Association for development, education and ecological ethics “POLIMAT 13” – the municipality of Bogdanci;
- Association “EKO-KOCKA” – the municipality of Demir Kapija;
- Citizens Association “EKOLOSHKO DRUSHTVO EKO CHIFLIK” – the municipality of Demir Kapija;
- Citizens Association “CENTAR ZA KLIMATSKI PROMENI” – the municipality of Gevgelija.

The information further emphasized the Project’s public interest and as supporting material maps were distributed, where the gas pipeline’s route could be seen and the Project could be overviewed in details.

8 Grievance Mechanism

A grievance mechanism will be adopted as presented below.

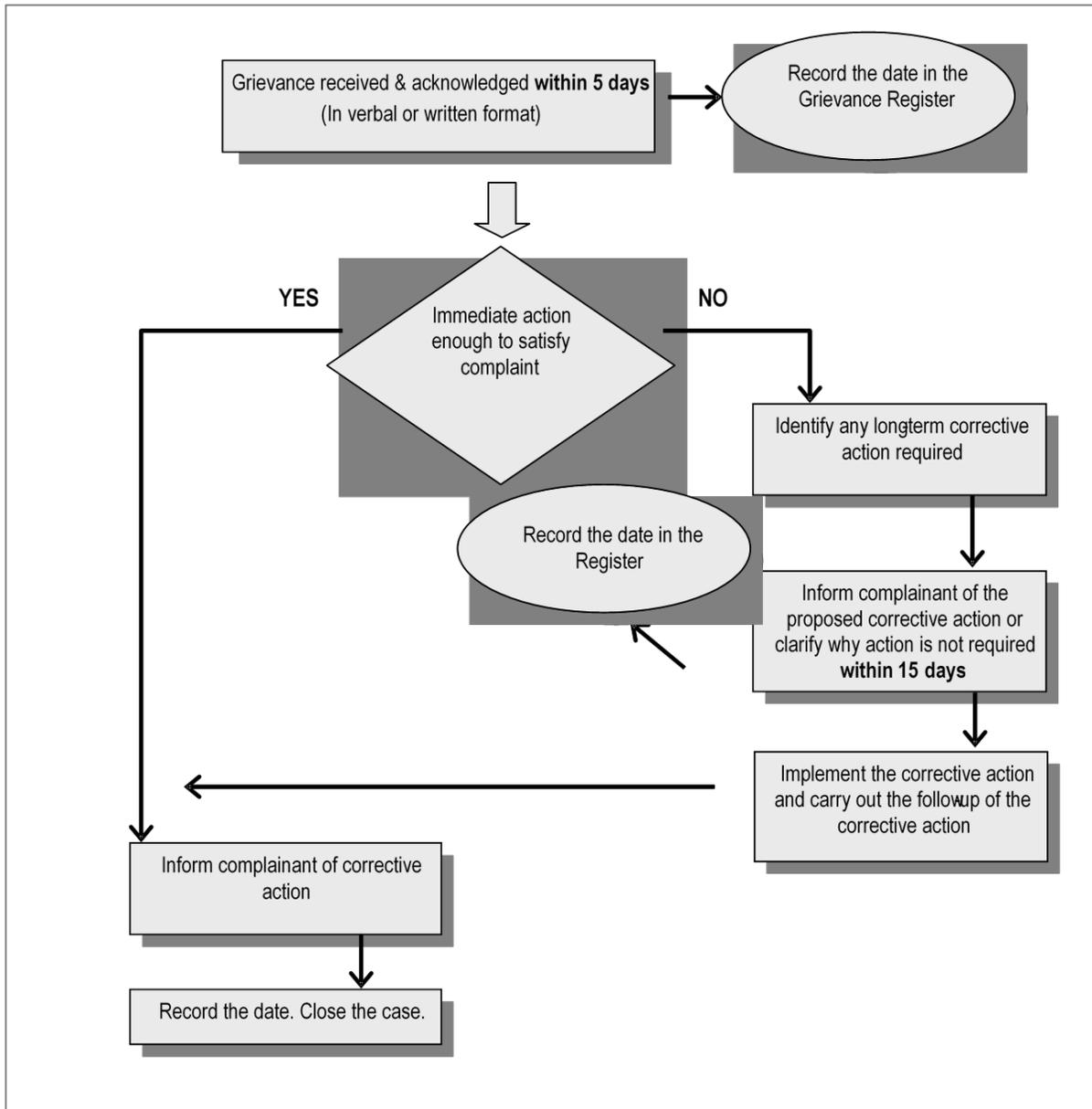


Figure 2: Grievance Mechanism

NER and the Contractor will accept all comments and complaints associated with the Project, submitted either verbally or in writing and in accordance to EBRD Project Complaint Mechanism (PCM)². NER recognizes that consultation is an ongoing process, and different concerns may arise as the Project moves

² The Project Complaint Mechanism is the EBRD's accountability mechanism that has been established to assess and review complaints about Bank-financed projects. It provides individual(s) and local groups that may be directly or adversely affected by a project, as well as civil society organisations, a means of raising complaints or grievances.

into the construction phase.

A sample of the Public Grievance Form is provided below. Any person or organization may send comments and/or complaints in person, by phone or via post or email using the contact information provided below.

Public Grievance Form	
Reference No:	
Name and Surname (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: Please note how you like to be contacted (mail, phone, e-mail)	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ <input type="checkbox"/> By Phone: _____ <input type="checkbox"/> By E-mail _____
Preferred language for communication	<input type="checkbox"/> [Macedonian] <input type="checkbox"/> [Other: _____]
Description of Incident or Grievance: What did happen? 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 to resolve the problem?	
Signature: _____ Date: _____	
Please return this form to: Name and Surname: Position: Tel: Email :	
National Energy Resources Blvd.Sveti Kliment Ohridski 58 B 1000 Skopje, Republic of North Macedonia	

All types of stakeholder grievances (apart from those raised by employees and contractors) relating to this Project should be channelled to NER through the designated staff member.

Contact details of the Contractor will also be made publicly available in the Municipalities adjacent to the Project works and included in a revised SEP, once the Contractor is appointed.

The Grievance Form (in Macedonian and English language) will be made available on the web site www.mer.com.mk and the concerned municipality will receive pre-printed forms to be readily-available for the public. A worker's Grievance Mechanism will also be established for the employees of construction companies (as a separate system).

NER will log and monitor the process of comments and complaints and the information will be summarized in annual EHSS reports, which will be prepared and posted on its website. NER is obliged to respond to all complaints according to procedures prescribed in national legislation and this SEP.

The response time for grievances will be in accordance with national legislation for the particular issue in question. NER will endeavour to acknowledge receipt of the Grievance within 5 working days, and to respond within 15 days of receiving the grievance to inform the complainant of the corrective action taken or proposed corrective action. Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of North Macedonia.

9 Monitoring and Reporting

The SEP is a 'living document' which will be updated periodically (at least once every six months) to record consultations undertaken, issues raised, actions taken; to describe lessons learned and any changes No the consultation process; and to outline the schedule for on-going and future interaction.

NER currently has the overall responsibility for stakeholder consultation and involvement. Proposed staffing is Community Liaison Senior Officer, and two Community Liaison Officers. Their role will be implementation of community engagement strategy and oversee all community liaison related matters, management of the grievance mechanism set up for the project-affected areas, establish a monitoring and evaluation plan and other 'tools' established such as the grievance register, commitment register and consultation register, provide reports to Senior Management for onward submittal to lenders and internal NER monitoring.

NER responsibilities are:

- NER will publish details of issues raised during the consultation process and provide appropriate feedback both on its website and place hard copies in the municipal offices of Negotino, Gevgelija, Demir Kapija and Bogdanci.
- Throughout the Project, NER will communicate with stakeholders and inform them of any significant issues, for example, changes in the Project schedule.
- NER will provide Project updates on its website and also provide leaflets to the local communities along the route, as necessary.
- NER will produce annual EHSS reports, which will include a summary of the Project's performance on management of health, safety, environment and social issues. This will be posted on the NER website.
- NER will conduct monitoring of SEP implementation and will, accordingly, report to relevant International Financial Institution on an annual basis for realized stakeholder engagement activities via Annual Environmental and Social Reports.

A sample sheet of the summary of the Monitoring Report is presented below:

Indicator	Activity/Item/Entity	Number
Grievances	<i>Received</i>	
	<i>Anonymously Received</i>	
	<i>Resolved</i>	
Bulletin Boards	<i>Total installed</i>	
	<i>Regularly served</i>	
Project information published on:	<i>Bulletin boards</i>	
	<i>Project website</i>	
	<i>Municipality website</i>	
	<i>Media website</i>	
	<i>Printed media</i>	
Meetings (presentations) held with representatives of:	<i>Local settlements</i>	
	<i>Municipality</i>	
	<i>Local businesses</i>	
	<i>NGO's</i>	
Hard copy documents for public	<i>Available locations</i>	
	<i>Available documents on site</i>	
Disclosed Project Information on	<i>Traffic issues</i>	
	<i>Public Health and Safety</i>	
	<i>Property and Housing</i>	
	<i>Business related</i>	
	<i>Stakeholder Engagement</i>	
	<i>Other issues</i>	
Monitoring report created: Date	Location	By (name and surname)
Date	Meeting for monitoring presentation	Location

Representative for:	Name and Surname	Signature
NER		
Local Communities		
Municipality _____		
NGO: _____		
Other: _____		
Other: _____		

10 Contact Details & Responsibility for SEP Implementation

The responsible person in NER for the implementation of the Stakeholder Engagement Plan is the following:

Name: Olivera Kostanceva
Position: Head of Department for Construction Gas Pipeline Systems
Tel: +389 26090137
Fax: +389 26090437
Email: olivera.kostanceva@mer.com.mk
Address: National Energy Resources
Blvd. Kliment Ohridski 58 B, 1000 Skopje,
Republic of North Macedonia

Information on the Project is also available at the Delegation of the European Union to the Republic of North Macedonia:

Address: Sv. Kiril i Metodij 52b
1000 Skopje
Tel: (+389) 2 3248 500
Fax: (+389) 2 3248 501

Also, information can be found on the Webpage: https://eeas.europa.eu/delegations/republic-north-macedonia/1456/about-eu-delegation-republic-north-macedonia_en

11 Appendix

Appendix 1 – Meetings / Activities re. Stakeholder Engagement until February 2020

Stakeholders	Date	Method	Issues	Outcomes
Ministry of Defense	December 2018	Formal submission	Letter with information for the development of the Project “Gas Interconnector North Macedonia-Greece”	Official response that Project does not encounter any obstacle that would hinder its permitting and construction process
Ministry of Culture	December 2018			Official response with recommendation that NER contacts the competent Services for the protection of Cultural Heritage in order to receive “expert opinion and, if necessary, establish appropriate protection regime”
Ministry of Environment and Physical Planning	July 2019	Official submission	Letter of Intent for the Project “Gas Interconnector North Macedonia-Greece” (i.e. ESIA Screening Application), submitted by NER	MoEPP distributed the document internally to relevant departments. The decision is not yet released (as of Nov. 2019)
	October 2019	Formal meeting	Presentation about project alignment and Environmental Impacts and measures	
Municipality of Negotino, Municipality of Demir Kapija, Municipality of Gevgelija and Municipality of Bogdanci	October 2019 January 2020	Formal meeting with representatives of Municipal administration and departments responsible for infrastructure development, environmental and social issues and economic development	Presentation about project development, alignment of the gas pipeline and Environmental and Social Impacts and mitigation measures and future economic development.	Confirmation for further communication and collaboration during the project development and Public Consultation

Stakeholders	Date	Method	Issues	Outcomes
Ministry of Defense	December 2018	Formal submission	Letter with information for the development of the Project "Gas Interconnector North Macedonia-Greece"	Official response that Project does not encounter any obstacle that would hinder its permitting and construction process
Ministry of Culture	December 2018			Official response with recommendation that NER contacts the competent Services for the protection of Cultural Heritage in order to receive "expert opinion and, if necessary, establish appropriate protection regime"
Community Representatives in the rural area of Municipalities	October 2019 January 2020	Unformal meetings with citizens of the area	Discussion about Project development, Time Plan, social impacts and benefits.	Confirmation for further communication and collaboration