

Republic of Kosovo

“Kosovo Improvement and Rehabilitation of Irrigation Systems” (IRIS)

Stakeholder Engagement Plan

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ACRONYMS

ARDP	Kosovo Agriculture and Rural Development project
AP	Affected People
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
EU	European Union
GoK	Government of Kosovo
GRM	Grievance Redress Mechanism
GM	Grievance Mechanism
GIZ	German Agency for International Cooperation
GBV	Gender Based Violence
IA	Implementing Agency
IMWC	Inter-Ministerial Water Council
IAS	Irrigation Advisory Services
IPF	Investment Project Financing
IPA	Instrument for Precession
IRIS	Kosovo Improvement and Rehabilitation of Irrigation Systems
IFI	International Financial Institutions
SCADA	Supervisory Control and Data Acquisition
KFW	German Development Bank (Kreditanstalt Für Wiederaufbau)
KCA	Kosovo Cadastral Agency
REDIS	Radoniqi-Dukagjini irrigation scheme
MFLT	Ministry of Finance, Labor and Transfers
MAFRD	Ministry of Agriculture, Forestry and Rural Development
MESPI	Ministry of Environment, Spatial Planning and Infrastructure
NGO	Non-Governmental Organizations
OHS	Occupational Health and safety
PDO	Program Development Objective
PIU	Project Implementation Unit
PA	Project Area

PAP	Project Affected Person
PPE	Personal Protective Equipment
US\$	United States Dollar
SEP	Stakeholder Engagement Plan
SEA	Sexual Exploitation and Abuse
SIDA	Swedish International Development Cooperation Agency
SH	Sexual Harassment
TA	Technical Assistance
WBG	World Bank Group

LIST OF DEFINITIONS FOR TERMS USED IN THIS DOCUMENT

<i>CONSULTATION</i>	The process of sharing information and getting feedback and/or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
<i>ENVIRONMENTAL AND SOCIAL STANDARDS</i>	The 10 Environmental and Social Standards (ESSs) set out the requirements that apply to all new World Bank investment project financing enabling the World Bank and the Borrower to manage environmental and social risks of projects.
<i>PAP</i>	“Project Affected Person” is any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
<i>PROJECT</i>	Refers to “Kosovo Improvement and Rehabilitation of Irrigation Systems” (IRIS) project.
<i>STAKEHOLDERS</i>	Refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties).
<i>STAKEHOLDER ENGAGEMENT</i>	A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, and reporting to stakeholders and management functions
<i>STAKEHOLDER ENGAGEMENT PLAN</i>	A plan which assists the Borrower to effectively engage with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.
<i>VULNERABLE GROUPS</i>	People, especially those below the poverty line, the landless, the elderly, women and children, or other displaced persons who may not be protected through national land compensation legislation, who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Executive summary

Introduction

The Government of Kosovo (GoK) intends to receive funding (EUR 10 million) from the European Union (EU) under Instrument for Pre-accession (IPA) grant for the implementation of the “Improvement and Rehabilitation of Irrigation Systems” (IRIS) project, which will support the upgrade and modernization of the irrigation infrastructure. Through the implementation of technical assistance measures, the Project will provide support to increase the institutional capacities with regard of governance improvement of the system as well as knowledge share for irrigation typologies for the farmers. The main aim of the investments to be supported with the EU IPA Grant is to effectively support an economically, environmentally and financially sustainable irrigation sector through infrastructure investment and technical assistance measures that will increase the efficiency of water utilization and boost agricultural productivity.

The Project is to be implemented by the Project Implementation Unit (PIU), hosted by the Ministry of Agriculture, Forestry and Rural Development (MAFRD) and aims to continue the infrastructure investments at the Radoniqi-Dukagjini Irrigation System (RDIS) that were initiated under the Irrigation Component of the Kosovo Agriculture and Rural Development (ARDP) Project, financed through a World Bank credit.

The IRIS Project will be a continuation of the rehabilitation following the investments made under the ARDP. This project will be funded entirely from an EU IPA Grant in the existing infrastructure of the RDIS which covers agricultural lands of the municipalities of Gjakova, Rahovec, and Prizren.

Project Description

The IRIS project development objective is to increase the efficiency of water utilization and boost agricultural productivity in the project area.

The project comprises three components:

Component 1: Improvement and Rehabilitation of the Radoniqi-Dukagjini irrigation scheme (Euro 8.23 million)

Subcomponent 1.1: This subcomponent will support 1) the rehabilitation works to modernize and upgrade the irrigation scheme of Radoniqi-Dukagjini, and 2) the supervision of the progress and quality of works during the implementation of rehabilitation works.

Subcomponent 1.2 Supervisory Control and Data Acquisition (SCADA) for the whole Radoniqi-Dukagjini irrigation system;

Component 2 – capacity building to support organizational and operational management to improve the sustainability and efficiency of infrastructure investments (Euro 0. 4 million)

This component will provide (a) technical assistance to the municipalities to strengthen the capacities of the municipal governments for the provision of irrigation and drainage advice to the farmers in an effective and sustainable way; (b) technical assistance to the Irrigation providers on improving the overall corporate governance and best practices in management and produce of high standard business plans ; (c) assistance to the farmers on modernization of on-farm irrigation technologies and display good practices for an efficient on-farm water management and (d) technical assistance to the MAFRD for policy, regulatory and institutional aspects supporting implementation of Irrigation Master Plan, e) support to knowledge exchange in the irrigation sector, such as organization of study tours and site visits to countries with advanced and automatized irrigation systems to enable farmers, Irrigation providers and Municipality staff

to learn and benefit from the knowledge and experiences of other Irrigation providers and on-farm water users.

Component 3 - Project Management, Coordination, Monitoring and Evaluation (EUR 0.4 million)

This component will provide overall project management support, coordination, including procurement, financial management, monitoring and evaluation (M&E), and public awareness of project activities. Project staff will benefit from capacity building on climate risk and resilience building.

Proposed project area

The proposed project covers the administrative area of the Radoniqi-Dukagjini Irrigation System (RDIS), formed in 2003 as a joint venture comprising two separate irrigation infrastructures Radoniqi and Dukagjini and that operates as an integrated irrigation system. The RDIS covers an area of about 9350ha and extends in the territory of the municipalities of Gjakovë, Rahovec and Prizren and is supplied with water from two different sources: Radoniqi lake –for Radoniqi and Lumbardhi I Prizrenit – for Duakgjini.

Purpose and objectives of the SEP

The purpose of the present Stakeholder Engagement Plan (SEP) is to outline the target groups, methods of stakeholder engagement and the responsibilities in the implementation of stakeholder engagement activities. The intention of the SEP is to activate the engagement of stakeholders in a timely manner during project preparation and implementation.

This Stakeholder Engagement Plan (SEP) was developed by the Ministry of Agriculture, Forestry and Rural Development (MAFRD), in order to clearly communicate to all interested and affected parties of the stakeholder engagement program which is to be implemented throughout the entire Project cycle, on national level.

Affected Parties

Project Affected Parties for this project at the central level are the Ministry of Finance, Labor and Transfers (MFLT), Ministry of Agriculture, Forestry and Rural Development (MAFRD), Implementing agency (IA) and Project Implementation Unit (PIU) within the MAFRD, RIC 'Radoniqi Dukagjini' and their employers. At the local level main identified affected parties are the beneficiary Municipalities and their respective agriculture and rural development directories, customers of RIC 'Radoniqi Dukagjini', citizens/inhabitants settled in the project area particularly those who will be involved in the project development or project implementation, local communities and farmers working within the project area, and World Bank.

Other Interested Parties

Other Interested Parties for this project at the central level are represented from the Ministry of Environment, Spatial Planning and Infrastructure (MESPI) and main agencies such as Kosovo Privatization Agency (AKP), Kosovo Cadastral Agency (KCA) and International Financial Organization and donors. At the local level main identified affected parties are Agriculture and Farmers Associations, Non-Governmental Organizations, Media, Private sector companies, as well as the general public.

Purpose of Stakeholder Engagement Program

The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups.

This SEP is designed to establish an effective platform for productive interaction with the affected parties and other interested parties in the implementation outcome of the project. Meaningful stakeholder

engagement throughout the project cycle is an essential aspect of good project management and provides opportunities to:

- Ensure meaningful citizen engagement,
- Solicit feedback to inform project design, implementation, monitoring, and evaluation,
- Clarify project objectives, scope and manage expectation,
- Assess and mitigate project risks,
- Enhance project out come and benefits,
- Disseminate project information and materials,
- Address project grievances.

Roles and Responsibilities

Stakeholder engagement will be coordinated and led by PIU. The PIU will closely coordinate with other key stakeholders –Local Governments (line departments included), Extension Services, and local NGOs.

Grievance Redress Mechanism

The Central Grievance Redress Committee (CGRC) shall be effective immediately after appraisal of the Project, in order to manage and appropriately answer complaints during its different phases while the LGRC shall be effective upon decision on each new Sub-Project has been taken. In addition to the GRM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.). However, the grievance mechanism for project workers required under ESS2 will be provided separately with details to be provided in the Labor Management Procedure. PIU and the Local Governments respectively are responsible for establishing functioning GRM and informing stakeholders about the GRM role and function, the contact persons and the procedures to submit a complaint in the affected areas.

Monitoring and Reporting of the SEP

The results of the stakeholder engagement process will be included in the Project Monitoring Reports. These will be provided at a frequency as indicated in the Environmental and social commitment plan (ESCP). The monitoring reports will include the following information:

- Venue, time and date of any public consultation meetings that have been undertaken;
- Issues and concerns raised during the consultative meetings;
- A list of the number and types of grievances raised in the reporting period and the number of resolved and/or outstanding grievances; and
- Information on how the issues raised during the meetings and through grievances were/will be taken into consideration during the Project implementation (construction) Phase.

The Reports will also include a summary of implemented corrective measures meant to address the grievances.

a. Formal Meetings

All formal meetings, which are scheduled through the stakeholder engagement team will be documented and minutes taken. Minutes will be captured in English and Albanian by team members engaged (Appointed expert within PIU). Attendance registers / form will be maintained in appropriate formats.

b. Attendance Register / Form

A Stakeholders register form will be used to track the Consultation and Disclosure process. Specific stakeholder engagement actions will then be tracked in the registers / form, which contains the list of all stakeholders identified, under what category they fall, their importance to the project in terms of how they can influence or be influenced by the Project.

c. Record Keeping

A master database will be maintained by Ministry of Agriculture, Forestry and Rural Development (MAFRD) to record and track management of all comments and grievances, and independently audited. This will serve to help monitor and improve performance of the Comment Response and, Grievance Redress Mechanism. This database will be continued throughout all phases of the Project.

Disclosure and Consultation requirements

Following a 14 days two-week disclosure window once endorsed by Ministry of Agriculture, Forestry and Rural Development (MAFRD) and the WB, the draft SEP, shall be subject to public consultations. The SEP will be disclosed in Albanian and English at the website of the MAFRD together with invitations to the Public Consultations. Given the importance of Project, its scale and geographical spread the Public invitation shall be announced in a reputable printed media with national coverage to allow a wide range of Stakeholders to be included in the Consultation process. This will provide the Stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures and allow MAFRD to consider and respond to them.

The Invitation shall indicate how the document to be consulted on may be accessed, the Project details, date, time and venue of the consultations, and contact information details for feedback and /or questions.

Once the Consultations have been completed, Minutes of the Meeting shall be prepared and annexed to the SEP. The Minutes shall reflect on the feedback received, questions raised and how these were incorporated into the final document. The attendance of Stakeholders shall be verified through a signed attendance log, preferable with contact details of the attendees and photographs with permission to disclose.

1. Introduction

1.1 Context

The Government of Kosovo (GoK) intends to receive funding (EUR 10 million) from the European Union (EU) under Instrument for Pre-accession (IPA) grant for the implementation of the “Improvement and Rehabilitation of Irrigation Systems” (IRIS) project, which will support the upgrade and modernization of the irrigation infrastructure. Through the implementation of technical assistance measures, the Project will provide support to increase the institutional capacities with regard to governance improvement of the system as well as knowledge share for irrigation typologies for the farmers. The main aim of the investments to be supported with the EU IPA Grant is to effectively support an economically, environmentally and financially sustainable irrigation sector through infrastructure investment and technical assistance measures that will increase the efficiency of water utilization and boost agricultural productivity.

The Project is to be implemented by the Project Implementation Unit (PIU), hosted by the Ministry of Agriculture, Forestry and Rural Development (MAFRD) and aims to continue the infrastructure investments at the Radoniqi-Dukagjini Irrigation System (RDIS) that were initiated under the Irrigation Component of the Kosovo Agriculture and Rural Development (ARDP) Project, financed through a World Bank credit.

The Kosovo Agriculture and Rural Development Project (ARDP), provided support to:

- Development of a Master plan and investment framework for the irrigation sector to guide future investments and management measures,
- The rehabilitation and modernization of the Radoniqi-Dukagjini irrigation scheme (RDIS).

The Master Plan and Investment Framework for the irrigation sector has recently been endorsed by the Inter-Ministerial Water Council (IMWC), and is a broad-based strategy with recommendation for infrastructure and technical assistance measures for short, medium and long-term for increasing water/agricultural productivity. Following the assessments, the rehabilitation of RDIS, has been ranked among the highest priority projects and is also the best performing scheme in the country which has secure water resource from the Radoniqi Lake even for future expansion possibilities of the scheme.

In 2019, a feasibility study for rehabilitation of the RDIS has been completed within the ARDP as a result of which engineering designs and bidding documents for the rehabilitation and modernization of the scheme have been developed. The total investment for the rehabilitation and modernization has been estimated at EUR 13.2 Mil which in general aims to improve and modernize irrigation services, reduce water losses and production costs and increase irrigated area. These investments include upgrade of the irrigation infrastructure and support to ensure institutional and financial sustainability to the Radoniqi-Dukagjini scheme by building a) Management Information System (MIS) for supporting water management; b) Supervisory Control and Data Acquisition (SCADA) for improving operations; c) strategic supply of spare parts and maintenance equipment; and d) harmonization of planning and budgeting with municipal plans, including the integration of water users' demands.

Rehabilitation investments started with support from the ARDP project with EUR 4.1 million. The infrastructure works commenced in August 2020 and are completed in July 2022. Beside the support in infrastructure rehabilitation, the ARDP financed other supply contracts at the value of EUR 470,000 for purchase of mechanization and transportation equipment needed for the RDIS.

The investments covered six irrigation sub-schemes and ensure irrigation of around 7,750 ha.

The works and supplies for scheme rehabilitation included:

- Lining and repairing of main canal sections;

- Construction of the flow meter manholes and montage of butterfly valves (to ensure water flow measurement) and rehabilitation of the outlet structure;
- Rehabilitation of six sub irrigation systems by replacement of the valves (280 pcs) with different profiles, of the cracked pipes with different profile (with a total length of around 2,100 m) and replacement of various fittings (couplings, flanges, cross pieces, adapters, spindles) in the primary, secondary and tertiary irrigation network in the sub irrigation systems;
- Rehabilitation and waterproofing of three regulating water basins;
- Investments in rehabilitation of the administrative building in Gjakova and warehouse in Lugbunar, and partial rehabilitation of administrative building in Prizren;
- Construction of two river crossing thresholds for protection of transit pipeline (one in Drini and another in Llukac river);
- Supply of spare parts, mostly big profile pipes from Ø1400 up to Ø 1800 and fittings (32 GRP pieces Ø 1400-1800; Straub, PVC and AC couplings around 1500 pcs; PVC adapters, valves and balls for air valves);
- Mechanization for operation and maintenance of irrigation infrastructures such as excavators, trucks for transportation of RDIC staff, water suction pumps, scooters for collection of payment for service delivery.

The IRIS Project will be a continuation of the rehabilitation following the investments made under the ARDP. This project will be funded entirely from an EU IPA Grant in the existing infrastructure of the RDIS which covers agricultural lands of the municipalities of Gjakova, Rahovec, and Prizren.

1.2 Project Description

The IRIS project development objective is to increase the efficiency of water utilization and boost agricultural productivity in the project area.

The project comprises three components:

Component 1: Improvement and Rehabilitation of the Radoniqi-Dukagjini irrigation scheme (Euro 8.23 million)

Subcomponent 1.1: This subcomponent will support 1) the rehabilitation works to modernize and upgrade the irrigation scheme of Radoniqi-Dukagjini, and 2) the supervision of the progress and quality of works during the implementation of rehabilitation works. Works for scheme rehabilitation include inter alia: (a) construction of regulating structure and montage of parts such as flow meter valves and manholes etc. aiming at regulating water flow and water use with approach to ensure efficient water management for a total surface of improved irrigated area of 7,750 ha and new additional irrigated area of 4,000 ha, and (b) rehabilitation of three irrigation sub-systems, Qerim with 1,800 ha, Janosh with 1,400 ha and sector "D" in Dukagjini with 800 ha, leading to extension of the Radoniqi-Dukagjini irrigation system with additional rehabilitated surface of 4,000 ha of agriculture land. The details of the rehabilitation works have been prepared, e.g., specific positions and the estimated costs, indicating a high implementation readiness.

Subcomponent 1.2 Supervisory Control and Data Acquisition (SCADA) for the whole Radoniqi-Dukagjini irrigation system;

In providing rehabilitation support to the scheme, the project will take a broader modernization approach to ensure both institutional and financial sustainability. Towards this, the project will also support Supervisory Control and Data Acquisition (SCADA) which is a communication system remotely enabling the operation of the irrigation structures and reducing the operational costs and water losses. SCADA will be applied to the whole irrigation system. In this regard, the RDIS will be able to manage with the reservoir (primarily the Radoniqi dam, reservoirs B9, B10, B11), operate pump stations and maintain water pressure, as required. It will allow centralized monitoring and control and detect irregularities in the network in real-time. In the cases of emergency, of any potential flooding of the dam, the manual operation of the valves in outlet structures is very risky, therefore, their operation through the SCADA system is inevitable.

Component 2 – capacity building to support organizational and operational management to improve the sustainability and efficiency of infrastructure investments (Euro 0.4 million)

This component will provide (a) technical assistance to the municipalities to strengthen the capacities of the municipal governments for the provision of irrigation and drainage advice to the farmers in an effective and sustainable way; (b) technical assistance to the Irrigation providers on improving the overall corporate governance and best practices in management and produce of high standard business plans ; (c) assistance to the farmers on modernization of on-farm irrigation technologies and display good practices for an efficient on-farm water management and (d) technical assistance to the MAFRD for policy, regulatory and institutional aspects supporting implementation of Irrigation Master Plan, e) support to knowledge exchange in the irrigation sector, such as organization of study tours and site visits to countries with advanced and automatized irrigation systems to enable farmers, Irrigation providers and Municipality staff to learn and benefit from the knowledge and experiences of other Irrigation providers and on-farm water users.

Technical assistance to the municipalities would focus on the provision of Irrigation Advisory Services (IAS) and drainage advice to the farmers about irrigation technologies, water use management depending on the crop production and increase of crop productivity. The activities would include training and coaching of municipal officials, set up of a Monitoring and Evaluation framework, and set up water users' groups.

Technical assistance to Irrigation providers would focus on the existing Irrigation providers to improve the overall corporate governance and best practices in management and produce business plans at a high standard. The project will particularly assist with good practices in Participatory Irrigation Management (PIM) which includes determining the irrigation fee, establishing a transparent fee collection and irrigation payment reporting system that will provide yearly reports to be made public to the end users (farmers' cooperatives, WUA and other farmers as users of the system).

The assistance to the farmers would focus on the following two categories of activities: (i) Support to on-farm irrigation development, which will include activities to develop and operate a pilot farm within the Irrigation providers , promote several modernized on-farm irrigation technologies and display good practices for an efficient on-farm water management, and organize training programs for on-farm irrigation to group of farmers addressing the topics of technologies, costs, maintenance, financing mechanism, etc. (ii) Support to farmers for agricultural development, which would include activities to increase the added value produced by farmers and optimize production costs, ensure the transition to a more productive agriculture while inserting agroecological practices, develop value chains and support marketing, and empower farmers groups.

Technical assistance to the MAFRD would focus on: (i) support for the amendment and completion of irrigation legislation and (ii) support for the development of a tariff setting methodology for irrigation services (methodology for calculation of water tariffs, cost identification and calculation, irrigation water demand, irrigation fee calculation, fees collection).

Support to knowledge exchange would be carried out by organizing study tours and site visits to countries with advanced and automatized irrigation systems to enable farmers, Irrigation providers and Municipality staff to learn and benefit from the knowledge and experiences of other Irrigation providers and on-farm water users. These exchanges will focus on introducing the beneficiaries to advanced practices and efficient use of water for irrigation for improving productivity, profitability and sustainability of their operations and increase their competitive potential in the sector.

Component 3 - Project Management, Coordination, Monitoring and Evaluation (EUR 0.4 million)

This component will provide overall project management support, coordination, including procurement, financial management, monitoring and evaluation (M&E), and public awareness of project activities. Project staff will benefit from capacity building on climate risk and resilience building.

Proposed project area

The proposed project covers the administrate area of the Radoniqi-Dukagjini Irrigation System (RDIS), formed in 2003 as a joint venture comprising two separate irrigation infrastructures Radoniqi and Dukagjini

and that operates as an integrated irrigation system. The RDIS covers an area of about 9350ha and extends in the territory of the municipalities of Gjakovë, Rahovec and Prizren and is supplied with water from two different sources: Radoniqi lake –for Radoniqi and Lumbardhi I Prizrenit – for Duakgjini.

1.2 Purpose of the SEP

The project is being prepared under the guidance of WB’s Environment and Social Framework (2018) (“ESF”) ¹. The ESF specifies the WB’s commitment to sustainable development through its policies and number of Environmental and Social Standards (“ESS”). As per ESS 10 on Stakeholders Engagement and Information Disclosure, the implementing agency (IA) should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The purpose of the present Stakeholder Engagement Plan (SEP) is to outline the target groups, methods of stakeholder engagement and the responsibilities in the implementation of stakeholder engagement activities. The intention of the SEP is to activate the engagement of stakeholders in a timely manner during project preparation and implementation. Specifically, SEP serves the following purposes: i) stakeholder identification and analysis; (ii) planning engagement modalities and effective communication tools for consultations and disclosure; (iii) defining role and responsibilities of different actors in implementing the SEP; (iv) defining the Project’s Grievance Mechanism (GM) and (v) providing feedback to stakeholders; (vi) monitoring and reporting of the SEP.

1.3 Objectives and Structure of the SEP

This Stakeholder Engagement Plan (SEP) was developed by the Ministry of Agriculture, Forestry and Rural Development (MAFRD), in order to clearly communicate to all interested and affected parties of the stakeholder engagement program which is to be implemented throughout the entire Project cycle, on national level.

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 (consequently, the sub-projects), and to carry out stakeholder engagement in line with the laws of the Republic of Kosovo, as well as the requirements of World Bank’s [Environmental and Social Framework](#).

The SEP shall be applicable to all activities planned under the Project. The engagement will be an integral part of the Project’s environmental and social performance and project design and implementation. SEP is a “living document” and it will need to be progressively updated as the IRIS Project progresses from stage to stage. At this stage of the preparatory phase, the main stakeholders have been contacted and consulted and also site visits have been performed based on the proposal of interventions and investments under each of the project components.

2. Regulatory Legal Framework

This chapter provides a summary of the relevant aligned policies and conventions from relevant policies, laws, regulations, and review processes in Kosovo, specifically involving public consultation and disclosure regarding environment and land acquisition / compensation, the two common concerns from the public.

¹ Available in English at: <http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>

2.1 National Requirements

The need for public disclosure and consultation activities, under national legislation, are set in the following relevant legislation:

- **Law on Environmental Protection**² provides the obligation of the central and local institutions and all other authorized organizations to regularly, timely and objectively inform the public on the environmental status, environmental quality and emission, warning measures, and pollution which may pose threat to human life and health. It also ensures the participation of the public in the decision-making processes.
- **Law on Environmental Impact Assessment**³ regulates the Environmental Impact Assessment (EIA) procedure, including the obligation of authorities to hold public hearings for projects that require an EIA. EIA Law requires that Environmental Impact Assessment Report be subject to public debate, and that the results of these consultations have to be taken into consideration in reaching the decision on the environmental consent.
- **Administrative Instruction on information, public participation and interested parties in the environmental impact assessment procedures**⁴, sets the methods for notifying the interested public and enabling their participation throughout the EIA process

Other relevant Laws which foresee disclosure of project information or support access to information, encompassing processes for raising grievances and appeals, are:

- **Article 41 of the Constitution of the Republic of Kosovo**, stipulates that every person enjoys the right to access public documents; the only restriction is set for the access to private information, business secrets and any protected and classified data.
- **Law on Access to Public Documents**⁵ (LAPD) guarantees the right of every natural and legal person to have access, without discrimination on any grounds, following a prior application, to official documents maintained, drawn or received by the public institutions. The grounds for limited access are translated from Art. 4 of the Constitution.
- In line with the **Law on Spatial Planning**⁶, the public must also be informed and consulted throughout the process of development and adoption of urban and spatial planning documents.

Furthermore, the country is not acceded to the **Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters**. Hence, most of principles of the Convention have been implemented in the national legislation.

2.2 World Bank Requirements

The World Bank has, in its Environmental and Social Framework (“the Framework”) which became effective in October 2018, committed to taking the path that leads to sustainable development. The Framework specifies the mandatory requirements in the form of 10 standards that borrowers must apply. The Bank has the opinion that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their objective to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. One of those 10 standards is the Stakeholder Engagement and Information Disclosure 10 (“ESS10”) which addresses stakeholder engagement. This standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

² No. 03/L-02526

³ No. 03/L-21437

⁴ No.09/11

⁵ No.03/L-21519

⁶ No. 04/L-174

Objectives of ESS10 are the following:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life -cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

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

The WB particularly emphasizes effective, inclusive and genuine citizen engagement through disclosure of project-related information, consultation and effective feedback. Projects must include in the design activities which engage citizens/beneficiaries. The interaction between the government and citizens must be two-way – meaning that citizens must be involved in the process of decision-making. When citizens provide inputs or feedback, the government needs to take these views into account, resolve the issues raised and respond to the citizens (i.e. provide feedback). Empowering citizens to participate in the development process and integrating citizen voice in development programs is the key to achieving positive results.

3. Consultations held on proposed IRIS Project

3.1 Summary of Stakeholder Engagement Done During Project Preparation

There were held numerous dialogues and several meetings and consultations with a broad range of stakeholders that preceded this project preparation. The consulted parties were representatives of central government/ministries operating in the GoK, the RIC 'Radoniqi Dukagjini', municipalities and other relevant institutions operating on the local level.

The stakeholder engagement activities that have taken place during Project preparation include:

- Numerous dialogues with central government and line ministries
- Missions and site visits to the project areas
- Communications and consultations with the main line agencies related
- Communication and consultation with the irrigation companies as beneficiaries of the project
- Meetings with local government, municipalities listed as beneficiary of project implementation
- Continuous consultations with the implementing agency etc..

The following table presents the stakeholder engagement activities held so far with reference to the overall Project.

Table 1. Stakeholder engagement activities conducted during Project preparation

Meeting	Date/Place	Name of Stakeholder	Position
Informative/ consultative meetings with the Ministry of Environment, Spatial Planning and Infrastructure (MESPI)	17 Aug 2022	Ismajl Hetemaj	Acting Director of the Department for Environmental and Water Protection Acting Head of the Division for Industrial Pollution Management Senior Officer for EIA and SEA
	31 Aug 2022	Visare Hoxha	
		Naim Alidema	
Informative meeting with the Municipality of Rahovec	18 Nov 2022 Rahovec	Smajl Latifi Ali Morina Berat Duraku	Mayor of Rahovec Chief of the Cabinet Director for Agriculture, Forestry and Rural Development
Informative meeting with the Municipality of Gjakova	18 Nov 2022, Gjakova	Ardian Gjini Shkumbin Kastrati	Mayor of Gjakova Director for Public Services, Protection and Rescue
Informative meeting with the municipality of Prizren	24 Nov 2022, Prizren	Shaqir Totaj Pranverim Berisha Bexhat Bytyqi Senxhar Karamuco Nexhat Elshani Jona Hoxha	Mayor of Prizren Director of Urban and Spatial Planning Director of Agriculture and rural Development Director of Geodesy and Cadaster Chief of Cabinet Public Relationship

4. Stakeholder Identification and Analysis

4.1 Introduction

The stakeholder engagement process is focused on identifying key stakeholders and informants who can further identify the full range of affected parties in the project area of influence.

ESS 10 recognizes two broad categories of stakeholders: 1) Project Affected Parties and 2) Other Interested parties. **Project-affected parties** includes those likely to be affected by the project because of actual impacts (positive and negative) or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including direct project beneficiaries and local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project. The term “**Other interested parties**” refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include the private sector, women’s organizations, other civil society organizations, and cultural groups.

Categories “affected parties” and “other interested parties” can be divided into two broad groups: i) citizens/ citizen groups (including informal community groups, civil society organizations (CSOs), and non-governmental organizations (NGOs), and ii) government/state actors, donors and other institutions (media, businesses); whereas “vulnerable persons/groups” always fall under the category of citizens/ citizen groups.

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. PIU/MAFRD and RIC Radoniqi-Dukagjini recognizes 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.

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

Table 2: Stakeholder categorization

Stakeholder category	Definition	Broad stakeholder groups identified for the project
Affected parties	Entities, agencies or Individuals, groups who are impacted or likely to be impacted directly or indirectly (actually or potentially), positively or adversely, by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures	<p>Citizens/ inhabitants settled/farmers living or working in the project area:</p> <ul style="list-style-type: none"> ▪ Local communities - Project Beneficiaries and affected people ▪ People living or working (Farmers) in the Project areas, beneficiary of RIC ‘Radoniqi-Dukagjini’ services ▪ People affected by land acquisition, service tariffs etc.. <ul style="list-style-type: none"> ▪ Construction workers ▪ RICs including ‘Radoniqi-Dukagjini’ workers <p>Central and local government involved:</p> <ul style="list-style-type: none"> • Main ministries, line agencies as well as project implementing agency and their employees. <ul style="list-style-type: none"> • RIC ‘Radoniqi Dukagjini’ • Municipalities beneficiary of the project activities and their line directories related to irrigation system services
Other interested parties	Individuals, groups or other entities who may have an interest in the Project. These stakeholders may not experience direct impacts from the project, but consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way	<ul style="list-style-type: none"> • Government actors at all levels, National agencies etc.. • Citizens/ citizen groups (Civil society organizations) • International development partners and donors • Private sector (construction and operation companies)
Vulnerable persons/ groups	Those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/group is also more likely to be	<ul style="list-style-type: none"> • Under-represented, disadvantaged individuals or groups who may be difficult to reach, illiterate or not be within the formal economy or housing market.

	excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.	<ul style="list-style-type: none"> • E.g. women, older people, minorities, very poor, migrants.
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In order to properly identify Project’s stakeholders, a detail analysis of the stakeholders in relation to separate Project’s components has been undertaken and the results are presented in the separate sub-chapters (4.2, 4.3, 4.4).

4.2 Affected Parties

Project Affected Parties for this project at the central level are the Ministry of Finance, Labor and Transfers (MFLT), Ministry of Agriculture, Forestry and Rural Development (MAFRD), Implementing agency (IA) and Project Implementation Unit (PIU) within the MAFRD and their employers. At the local level main identified affected parties are the beneficiary RIC ‘Radoniqi Dukagjini’, respective Municipalities and their respective agriculture and rural development directories, customers of RIC ‘Radoniqi Dukagjini’, citizens/inhabitants settled in the project area particularly those who will be involved in the project development or project implementation, local communities and farmers working within the project area, and World Bank. These are presented in the following table:

Table 3. Identification of affected parties

Stakeholders	Main interests in the Project
Affected Parties	Role
Central Level:	
Ministry of Finance, Labor and Transfers (MFLT)	State budget financial management, inclusion of state guarantees. Grant Agreement oversight.
Ministry of Agriculture, Forestry and Rural Development (MAFRD)	Responsible for implementation of the respective project components related to the field of operation.
Implementing Agency:	
Project Implementation Unit (PIU) within the MAFRD and their employers	Responsible for overall implementation of the project. Implementation responsibilities will be delegated to a Project Implementation Unit (PIU), with the Project Director reporting directly to the Secretary General.

Stakeholders	Main interests in the Project
RIC 'Radoniqi Dukagjini'	Responsible for the administration of the RDIS
Local Government:	
Beneficiary Municipalities (Gjakove, Prizren and Rahovec)	Primary beneficiary of project implementation. Responsible for providing assistance to the overall project implementation and following up Implementation responsibilities.
Agriculture and rural development directories within the beneficiary municipalities	Responsible for providing assistance to project implementation and following up Implementation responsibilities related.
Farmers and Agriculture Associations operating in the project area	Beneficiary from project implementation for the respective project components related.
Non-Governmental Organizations (NGO) operating in the project area	Present a potential of providing assistance during project implementation for the respective project components related.
Citizens /inhabitants Farmers settled in the project area particularly those who will be involved in the project development or project implementation And customers of Radoniqi Dukagjini Irrigation System	Successful implementation of the project with visible and measurable results. Directly impacted/affected from the project implementation
Private sector Consulting/Construction/Operation Companies, particularly those who will be contracted during project development or project implementation	Present a potential of providing assistance during project phases such as design implementation and operation, for the respective project components related.
World Bank	Successful implementation and functionality of the project with visible and measurable results and outputs

It should be noted that this SEP is a “living document” which will be updated regularly throughout the project life as appropriate, including the list of identified stakeholders.

4.2 Other Interested Parties

Other Interested Parties for this project at the central level are represented from the Ministry of Environment, Spatial Planning and Infrastructure (MESPI) and main agencies such as Kosovo Privatization Agency (AKP), Kosovo Cadastral Agency (KCA) and International Financial Organization and donors. At the local level main identified affected parties are Agriculture and Farmers Associations, Non-Governmental Organizations, Media, Private sector companies, as well as the general public. These are presented in the following table:

Table 4. Identification of other interested parties

Stakeholders	Main interests in the Project
Other interested parties	Role
Central Level:	
Ministry of Environment, Spatial Planning and Infrastructure (MESPI)	Responsible for Environmental and Water Protection Pollution Management
National Agencies:	
Kosovo Cadastral Agency (KCA)	Responsible for reviewing the expropriation dossier and to provide successful implementation of the expropriation procedures.
Kosovo Privatization Agency (AKP)	Responsible for Issuing permit/approval for the project activities related to the locations administrated from AKP
Official social media (official webpages, Twitter, Facebook etc)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement
International Financial Organization and donors:	
IFIs operating in the Government of Kosovo	Coordination, to exclude interferences, disruptions and conflicts with their ongoing activities within the GoK
Local and community level:	

Stakeholders	Main interests in the Project
Line departments: land management, economic development, environment etc. within the beneficiary municipalities	Helps to arrange public meetings and consultations, liaison between targeted groups. Assist the achievement of the main tasks of the project.
Farmers and agriculture associations	Represent an interest to the related project components
Non-Governmental Organizations (NGO)	Successful implementation of the project
Citizens/inhabitants	Successful implementation of the project with visible and measurable results
Consulting/Construction and operation Companies	Represent an interest to the related project components which will require services from private sector
Other companies: equipment suppliers and service providers	Successful delivery of equipment, services and outputs to the Project
Local media (radio, TV, Newspaper)	Enable wide and regular dissemination of information related to the Project to ensure its visibility, facilitate stakeholder engagement on the local level, regional and national level

4.3 Disadvantaged / Vulnerable Individuals or Groups

Also, part of the stakeholders, are the beneficiaries of the project implementation. Between the main beneficiaries as citizens located within the project area, are included the vulnerable groups as well. The classification of the potential vulnerable groups that may be affected from the project, are identified and analyzed based on their exposure to risk and their inability to cope:

vulnerability = exposure to risk + inability to cope

Based on the inability to cope, different vulnerable groups in society have been identified

- Young families with low incomes,
- Groups of minorities, settled in informal areas Roma, Egyptian and Ashkali minorities.
- Single elderly people.

Apart the preliminary evaluation of potential vulnerable groups, the mapping of this category, is likely to be evolving throughout the project phases. Disadvantaged/vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. Such groups are also more likely to be excluded from the consultation process. It also includes groups who may be difficult to reach due to communication barriers (language, illiteracy) and those who are in the informal housing market or informal economy and those who are very poor and may find it hard to pay regular tariffs. Disadvantaged / vulnerable individuals or groups in the project area include “low-income households”; women; youth; women-headed households; elder-headed households (≥ pension age) without any other household member bringing in income; persons with limited mobility; or persons with disabilities; women in rural communities, individuals and habitat communities. Various types of barriers may influence the capacity of such groups to articulate their concerns and priorities about project impacts. For each Sub-Project a vulnerability assessment will be conducted as part of the project preparation and shall inform both the Resettlement Plan if needed and the need to adapt the engagement methods and approaches as designed in this SEP to bridge any engagement barriers stemming from vulnerability.

5. Institutional Analysis

The engaged existing institutions have been analyzed in the table below. The following table presents Matrix that will facilitate in determination where to concentrate stakeholder engagement efforts during project implementation.

Level of Influence

High	Involve/engage	Involve/Engage	Partner
Medium	Inform	Consult	Consult
Low	Inform	Inform	Consult
	Low	Medium	High

Level of Interest

Color-coding	Engage closely and influence actively: require regular and frequent engagement, typically face-to-face and several times per year, including written and verbal information
	Keep informed and satisfied: require regular engagement (e.g. every half-a-year), typically through written information
	Monitor: require infrequent engagement (e.g. once a year), typically through indirect written information (e.g. mass media).

The following table summarizes the Stakeholder analysis.

Table 5. Stakeholder analysis

Stakeholder Group	Stakeholders sub-Groups	Nature of interest in the project	Interest	Influence
Project-affected parties				
Central Government	Ministry of Finance, Labor and Transfers (MFLT) Ministry of Agriculture, Forestry and Rural Development (MAFRD) and the World Bank	State budget financial management, inclusion of state guarantees. Grant Agreement oversight. Guide on strategy for project implementation Support, cross agency coordination Approval of workplan and progress report Resolve any issue.	High	High
Implementing Agency	MAFRD with its Project Implementing Unit (PIU) RIC 'Radoniqi Dukagjini'	Responsible for the overall implementation of the project.	High	High
Local Government and local communities	Beneficiary Municipalities (Gjakove, Prizren, Rahovec) Agriculture and rural development directories within the beneficiary municipalities	Primary beneficiary of project implementation. Responsible for providing assistance to the overall project implementation and following up implementation responsibilities	High	Medium
	Individual Farmers and Farmer Associations operating in the project area	Beneficiary from project implementation for the respective project components related.	Medium	Medium
	Non-Governmental Organizations (NGO) operating in the project area	Present a potential of providing assistance during project implementation for the respective project components related.	Medium	Medium

Stakeholder Group	Stakeholders sub-Groups	Nature of interest in the project	Interest	Influence
	PAPs /inhabitants settled in the project area particularly those who will be involved in the project development or project implementation	Successful implementation of the project with visible and measurable results. Directly impacted/affected from the project implementation	Medium	Medium
	Private sector Consulting/Construction/Operation Companies, particularly those who will be contracted during project development or project implementation	Present a potential of providing assistance during project phases such as design implementation and operation, for the respective project components related.	Medium	Medium
World Bank	World Bank	Successful implementation and functionality of the project with visible and measurable results and outputs	High	High
Other interested parties				
Government of the Republic of Kosovo with its Ministries	GoK with its Ministries	Overall successful implementation of the project	High	High
National/Regional Agencies	Kosovo Cadastral Agency (KCA)	Responsible for reviewing the expropriation dossier and to provide successful implementation of the expropriation procedures.	Medium	Medium
	Kosovo Privatization Agency (AKP)	Responsible for Issuing permit/approval for the project activities related to the locations administrated from AKP	Medium	Medium
	Official social media (official webpages, Instagram, Facebook etc)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	Medium	Medium

Stakeholder Group	Stakeholders sub-Groups	Nature of interest in the project	Interest	Influence
NGOs with main activity in:	Gender Inclusion	Increased Gender Inclusion Effects in the society	Medium	Medium
	Environmental protection, water quality protection, Agriculture, circular economy, pollution prevention, etc...	Successful implementation of the project in all aspects Possibility of engagement under the project components	High	Medium
Private Sector Companies	Consulting/Construction and operation Companies	Represent an interest to the related project components which will require services from private sector	High	Medium
	Media & communication	Enable wide and regular dissemination of information related to the Project to ensure its visibility, facilitate stakeholder engagement on the local level, regional and national level	Low	Low
	Other companies: equipment suppliers and service providers	Successful delivery of equipment to the Project	Medium	Low
International Financial organizations and Donors	German Development Bank (KFW) EU The Swedish International Development Cooperation Agency (Sida), German Agency for International Cooperation (GIZ), etc...	Successful implementation of the Project, without interferences, disruptions and conflicts with their ongoing activities within MAFRD/PIU	Low	High
General Public	General Public	Successful implementation of the project	Medium	Low
Vulnerable/Disadvantaged Groups				

Stakeholder Group	Stakeholders sub-Groups	Nature of interest in the project	Interest	Influence
Vulnerable/Disadvantaged Groups	Unemployed youth, women, elderly, people living beneath the poverty line, illiterate women, minorities etc.	To receive information and to be involved in the project consultations. Their voice to be heard and their needs to be taken into account.	Medium	Medium

6. Stakeholder Engagement Plan

6.1 Principles and Purpose of Stakeholder Engagement Program

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

- Openness and life-cycle approach: public consultations for the project will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- Inclusiveness and sensitivity: stakeholder identification is undertaken to support better communication and build effective relationships.

The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups.

This SEP is designed to establish an effective platform for productive interaction with the affected parties and other interested parties in the implementation outcome of the project. Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities to:

- Ensure meaningful citizen engagement,
- Solicit feedback to inform project design, implementation, monitoring, and evaluation,

- Clarify project objectives, scope and manage expectation,
- Assess and mitigate project risks,
- Enhance project out come and benefits,
- Disseminate project information and materials,
- Address project grievances.

6.2 Information Disclosure

Table 6 briefly describes what kind of information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to target the wide range of stakeholder groups.

Table 6: Description of Information Disclosure Methods

Disclosure channel	Information/documents to be disclosed	Target stakeholders	Frequency	Responsibilities
Official Websites of Ministry of Agriculture, Forestry and Rural Development (MAFRD) Beneficiary RIC 'Radoniqi Dukagjini' and respective Municipalities included in the project.	<ul style="list-style-type: none"> Project documents (including this SEP and ESIA) and other relevant reports <ul style="list-style-type: none"> Regular updates on Project development Quarterly reports on project progress Details about the Grievance Redress Mechanism together with an electronic grievance submission form Contact details of the PIU in MAFRD, RIC 'Radoniqi Dukagjini' and Municipalities included in the Project <ul style="list-style-type: none"> Leaflet containing information on project grievance redress mechanism (GRM) Results of user-satisfaction surveys Summaries of stakeholder engagement activities (Appendix 2 format) 	All stakeholders	<p>Regularly in line with project dynamics</p> <p>Summaries of stakeholder engagement activities (semiannually)</p> <p>Results of user satisfaction surveys (annually)</p>	<p>PIU – Within MAFRD</p> <p>Project covered Municipalities</p> <p>RIC Radoniqi-Dukagjini</p>
Media, including traditional and social media - dedicated project Facebook, Instagram pages)	<p>Project announcements and engagement activities</p> <ul style="list-style-type: none"> Invitations to public consultations Information on planned meetings or the availability of project information Brief reports on project progress 	All stakeholders	Regularly in line with project dynamics	<p>PIU – Within MAFRD</p> <p>Project covered Municipalities</p> <p>RIC Radoniqi-Dukagjini</p>
Email	<ul style="list-style-type: none"> Invitations to consultation meetings Project documents 	Government actors; local agencies, Farmers associations, local communities, NGOs	As needed	<p>PIU – Within MAFRD</p> <p>Project covered Municipalities</p> <p>RIC Radoniqi-Dukagjini</p>

<p>Project covered Municipalities official webpage</p>	<ul style="list-style-type: none"> • Leaflet containing information on project GRM 	<p>RIC 'Radoniqi-Dukagjini' workers, people living in Project affected area</p>	<p>Start of project activities</p>	<p>PIU – Within MAFRD Project covered Municipalities</p>
<p>On-site meetings, trainings and written instructions</p>	<ul style="list-style-type: none"> • Project GRM, OHS measures, risks during construction works, waste and hazardous materials management precautions, PPE, ect. 	<p>Workers hired during construction phase, workers engaged in project implementation activities', Local communities</p>	<p>Prior to start the implementation of construction works foreseen under the project, and continuously as needed</p>	<p>PIU RIC 'Radoniqi Dukagjini' Beneficiary Municipalities, Workers and Construction and supervision companies staff involved in the project</p>

6.2 Proposed Strategy for Information Disclosure

Table 6. Information disclosure strategy

Project stage	Target stakeholders	Topics of Engagement	Methods proposed	Locations/ frequency	Responsibilities
Stage 1: Project preparation (ESIA/RPF/LMP/ SEP Disclosure, project design, procurement of contractors and suppliers)	Identified Project Affected Parties and Vulnerable Groups <ul style="list-style-type: none"> ▪ People affected by land acquisition; affected increased level of services and tariffs Farmers Working in the project area ▪ People residing in project area; ▪ Vulnerable households 	<ul style="list-style-type: none"> ▪ Land acquisition process; ▪ Assistance in gathering official documents for early land registration; ▪ Compensation rates and methodology; ▪ Project documents disclosure; ▪ Project scope and rationale; ▪ Project E&S principles; ▪ Resettlement and livelihood restoration options; ▪ Grievance redress mechanism process. 	<ul style="list-style-type: none"> ▪ Virtual public meetings, virtual trainings/workshops; ▪ Face-to-face meetings; ▪ PAPs consultation meetings; ▪ Mass/Social Media Communication - Facebook; ▪ Disclosure of written information - Brochures, posters, flyers, leaflets, website; ▪ Information boards in the premises of the local communities, Municipalities level; ▪ Grievance redress mechanism; ▪ PAP survey –prior to completion of resettlement; 	<ul style="list-style-type: none"> ▪ Project launch meetings in Project affected municipalities and local communities; ▪ Monthly online meetings in Project affected municipalities; ▪ Survey of PAPs in Project affected municipalities and local communities; ▪ Communication through mass/social media and official municipalities web sites (as needed); ▪ Information boards with brochures/posters/leaflets in the premises of the Project affected Regular basis, as the information is updated it is redisclosed	<ul style="list-style-type: none"> ▪ PIU (Environment & Social (E&S) Consultants); RIC ‘Radoniqi Dukagjini’ ▪ Project covered Municipalities ▪ Land acquisition, department of Municipalities ▪ RAP consultant; ▪ World Bank project team
	Other Affected Parties (Government actors) <ul style="list-style-type: none"> ▪ Local Government ▪ Local Agencies ▪ RIC ‘Radoniqi Dukagjini’ and Municipalities and their relevant 	<ul style="list-style-type: none"> Project documents disclosure; ▪ Land acquisition process; ▪ Registration of land plots; ▪ Project scope, rationale and E&S principles; ▪ Grievance redress mechanism process 	<ul style="list-style-type: none"> ▪ Direct email communication ▪ Individual and/or group meetings online, or with physical presence ▪ Face-to-face meetings; ▪ Virtual public meetings with PAPs. 	Regularly as needed (Weekly/Biweekly)	<ul style="list-style-type: none"> ▪ PIU (Environment & Social (E&S) Consultants); RIC ‘Radoniqi Dukagjini’ ▪ Project covered Municipalities ▪ Land acquisition, department

Project stage	Target stakeholders	Topics of Engagement	Methods proposed	Locations/ frequency	Responsibilities
	departments; ▪ agriculture and rural development directories ▪ Cadaster offices				▪ RAP consultant; ▪ World Bank project team
	Other Interested Parties ▪ Press and media at the project level; ▪ NGOs; ▪ General public, jobseekers; ▪ Businesses and Business organizations; ▪ Workers' organizations.	▪ Land acquisition process; ▪ GBV/SEA/SH related consultation; ▪ Grievance redress mechanism process; ▪ Project documents disclosure; ▪ Project scope, Project information rationale and E&S principles;	▪ Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); ▪ Mass/social media communication- Facebook, Instagram; ▪ Disclosure of written information - Brochures, posters, website; ▪ Information boards in project areas and Municipalities ▪ Grievance redress mechanism; ▪ media, local representatives; ▪ Notice board for employment recruitment. GBV/SEA/SH related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including,	▪ Information is redisclosed continuously, as gets updated ▪ Monthly online meetings in RIC 'Radoniqi Dukagjini' and Project affected municipalities;	▪ Land acquisition department of Municipalities; ▪ PIU (Environment & Social (E&S) Consultants); ▪ RIC 'Radoniqi Dukagjini' Project covered Municipalities

Project stage	Target stakeholders	Topics of Engagement	Methods proposed	Locations/ frequency	Responsibilities
			local NGOs and NGOs specifically working on GBV/SEA/SH matter.		
	<p>Other Interested Parties (Government actors)</p> <ul style="list-style-type: none"> ▪ Other Government Departments from which permissions/ clearances are required; ▪ Other project developers reliant on or in the vicinity of the Project and their financiers 	<ul style="list-style-type: none"> ▪ Project information - scope and rationale and E&S principles; ▪ Coordination activities; ▪ Land acquisition process; ▪ Grievance redress mechanism process. 	<ul style="list-style-type: none"> ▪ Face-to-face meetings; ▪ Invitation to virtual public meetings. ▪ Direct email communication 	As needed	<ul style="list-style-type: none"> ▪ PIU (Environment & Social (E&S) Consultants); RIC ‘Radoniqi Dukagjini’ ▪ Project covered Municipalities
	<p>Other Interested Parties (Citizens)</p> <ul style="list-style-type: none"> ▪ Other PIU’s Staff; ▪ Project Design and Development Engineers; ▪ Contractors, sub-contractors, service providers, suppliers, and their workers/labor force 	<ul style="list-style-type: none"> ▪ Project information - scope and rationale and E&S principles; ▪ Training on ESIA/ESMP requirements and other sub management plans; ▪ GBV/SEA/SH awareness-raising and training on the contractors’ code of conduct (which will include GBV/SEA/SH); 	<ul style="list-style-type: none"> ▪ Online trainings and workshops; ▪ Face-to-face meetings, only if needed; ▪ Invitation to virtual public meetings, virtual trainings/workshops; ▪ Submission of required reports. 	As needed	<ul style="list-style-type: none"> ▪ PIU (Environment & Social (E&S) Consultants); RIC ‘Radoniqi Dukagjini’ ▪ Project covered Municipalities/administrative units ▪ Land acquisition, department of Municipalities

Project stage	Target stakeholders	Topics of Engagement	Methods proposed	Locations/ frequency	Responsibilities
		<ul style="list-style-type: none"> Grievance redress mechanism process; Feedback on consultant/contractor reports. 			<ul style="list-style-type: none"> RAP consultant; World Bank project team
Stage 2: Implementation/construction phase	Project Affected Parties (PAPs) and Vulnerable Groups <ul style="list-style-type: none"> People affected by land acquisition; People residing in project area; Vulnerable households 	<ul style="list-style-type: none"> Land acquisition process (land registration; compensation rates and methodology; livelihood restoration) Grievance redress mechanism process; Community Health and safety impacts (Construction-related safety measures); Employment opportunities; Environmental concerns; GBV/SEA/SH awareness-raising; Project status. 	<ul style="list-style-type: none"> Virtual/face to face public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); PAPs consultation meetings, Individual outreach to PAPs; Mass/Social Media Communication - Facebook; Disclosure of written information - Brochures, posters, flyers, website Municipalities/administrative units Notice board(s) at construction sites Grievance redress mechanism; Local monthly newsletter; PAP survey - Upon completion of resettlement and/or construction 	<ul style="list-style-type: none"> Monthly/quarterly meetings in all affected municipalities and administrative units with ongoing construction; 	<ul style="list-style-type: none"> PIU (Environment & Social (E&S) Consultants); RIC 'Radoniqi Dukagjini' and Project covered Municipalities Land acquisition, department of Municipalities RAP consultant; World Bank project team

Project stage	Target stakeholders	Topics of Engagement	Methods proposed	Locations/ frequency	Responsibilities
	<p>Other Affected Parties (Government actors)</p> <ul style="list-style-type: none"> Local Government Municipalities; local agencies and departments related to the project Cadastre offices 	<ul style="list-style-type: none"> Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance redress mechanism process; Project status. 	<ul style="list-style-type: none"> Face-to-face meetings; Virtual public meetings with PAPs. 	Weekly (as needed)	<ul style="list-style-type: none"> PIU (Environment & Social (E&S) Consultants); RIC 'Radoniqi Dukagjini' and Project covered Municipalities Land acquisition, department of Municipalities Supervision and RAP consultants; Contractor/subcontractors.
	<p>Other Interested Parties</p> <ul style="list-style-type: none"> Press and media at the project level; NGOs; General public, jobseekers, tourists; Businesses and Business organizations; Workers' organizations. 	<ul style="list-style-type: none"> Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Health and safety impacts and community health and safety; Employment opportunities; Environmental concerns; GBV/SEA/SH related consultation; 	<ul style="list-style-type: none"> Face to face / Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); Mass/Social Media Communication - Facebook; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information boards in the 	Monthly/quarterly meetings in all affected municipalities with ongoing construction and local communities;	<ul style="list-style-type: none"> Land acquisition department of Municipalities and administrative units; PIU (Environment & Social (E&S) Consultants); Project covered Municipalities/administrative units Supervision and RAP consultants; Contractor/sub

Project stage	Target stakeholders	Topics of Engagement	Methods proposed	Locations/ frequency	Responsibilities
	<p>Other Interested Parties</p> <ul style="list-style-type: none"> ▪ Other project implementing agencies Staff; ▪ Supervision Consultants; ▪ Contractor, subcontractors, service providers, suppliers and their workers 	<ul style="list-style-type: none"> ▪ Grievance redress mechanism process. 	<p>premises of the local community Municipalities</p> <ul style="list-style-type: none"> ▪ Grievance mechanism; ▪ Project tours for media, local representatives; ▪ Notice board(s) at construction sites. <p>GBV/SEA/SH related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including local NGOs</p>		contractors
<u>Stage 3: post-construction/operation phase</u>	<p>Project Affected Parties (PAPs) and Vulnerable Groups</p> <ul style="list-style-type: none"> ▪ People affected by land acquisition; ▪ People affected by service tariffs increment ▪ People residing in project area; ▪ Vulnerable households 	<ul style="list-style-type: none"> ▪ Satisfaction with engagement activities and GRM; ▪ Grievance redress mechanism process; ▪ Community health and safety measures during operation phase; ▪ GBV/SEA/SH awareness-raising; ▪ Accessing resettlement compensation and 	<ul style="list-style-type: none"> ▪ Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); ▪ Individual outreach to PAPs; ▪ PAPs consultation meetings; ▪ Mass/Social Media Communication - Facebook; ▪ Grievance redress mechanism; ▪ PAP survey - Upon completion of resettlement 	<ul style="list-style-type: none"> ▪ Meetings in affected municipalities and administrative units (semiannual); ▪ Survey of PAPs; ▪ Information boards with brochures/posters/leaflets in the premises of the Project affected Municipalities 	<ul style="list-style-type: none"> ▪ PIU (Environment & Social (E&S) Consultants); ▪ Project covered Municipalities/administrative units ▪ Land acquisition, department of Municipalities

Project stage	Target stakeholders	Topics of Engagement	Methods proposed	Locations/ frequency	Responsibilities
		completing land transfer (for PAPs who have not yet received it, if any)			
	Other Interested Parties (Citizens and local community) <ul style="list-style-type: none"> ▪ Press and media at the project level; ▪ NGOs; ▪ General public, jobseekers, tourists; ▪ operation and management Businesses and Business organizations; ▪ Workers' organizations. (Government actors ▪ Local Government (Municipalities and Cities) Departments; 	Grievance redress mechanism process; <ul style="list-style-type: none"> ▪ GBV/SEA/SH related consultation; ▪ Community health and safety measures during operation phase. 	<ul style="list-style-type: none"> ▪ Mass/Social Media Communication - Facebook; ▪ Disclosure of written information ▪ Project tours for media, local representatives. GBV/SEA/SH related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, local NGOs and NGOs specifically working on GBV/SEA/SH matter.	Meetings in affected municipalities (semiannual);	<ul style="list-style-type: none"> ▪ PIU (Environment & Social (E&S) Consultants); ▪ Municipalities

7. Implementation Arrangements and Intuitional Analysis for Stakeholder Engagement

7.1 Project Enabling Efforts from Lessons Learned

The Project recognizes that the stakeholder profile is quite diverse their expectations and orientation as well as capacity to interface with the project might be different. The project design and institutional arrangements have been drawn such as to enable mitigation of social exclusion risks and come up with types of activities and approaches to address the likely impediments arising the reform. This Project will be based on the early engagement and maintenance of dialog as a role model overall and in engagement with local communities in particular during preparation and implementation of site-specific resettlement plans.

7.2 Roles and Responsibilities

Stakeholder engagement will be coordinated and led by the PIU supported by the social and environmental specialist. The PIU will closely coordinate with other key stakeholders –Local Governments (line departments included), Extension Services, and local NGOs.

8. Grievance Redress Mechanism

Grievance includes complaints and suggestions on project implementation. Key objective of grievance mechanism is to ensure efficient manner to address grievances. The World Bank expects each project to establish such a mechanism in line with ESS10, at early stage of project development in order to be able to address specific issues in adequate and timely manner. The project will help improve the existing grievance mechanisms to ensure all grievances are recorded and monitored, with the aim to increase transparency and accountability, as well as to reduce risk of Project's adverse environmental and social impact. A Project level grievance redress mechanism (GRM) will be administered by the PIU and Sub-Project specific Local Grievance Redress Committees (LGRC), established and administered by the local Governments with representatives from the key stakeholders: PIU representative, Municipal representative and representative of the PAPs, NGO representative (female) working for Gender and GBV/SEA/SH issues. The GRM will provide the opportunity for continued feedback on the Subprojects and resolution of individual grievances during implementation. Procedures related to complaints handling will be posted on the PIU website to ensure full transparency. The GRM shall serve as both Project level information center and grievance mechanism, available to those affected by implementation of all Project sub-components and be applicable to all Project activities and relevant to all local communities affected by project activities. The GRM shall be responsible for receiving and responding to grievances and comments of the following four groups:

- A person/legal entity directly affected by the project, potential beneficiaries of the Project,
- A person/legal entity directly affected by the project through land acquisition and resettlement,
- Stakeholders - people with interest in the project, and
- Residents/communities interested in and/or affected by project activities.

The Central Grievance Redress Committee (CGRC) shall be effective immediately after appraisal of the Project, in order to manage and appropriately answer complaints during its different phases while the LGRC shall be effective upon decision on each new Sub-Project has been taken. In addition to the GRM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.). However, the grievance mechanism for project workers required under ESS2 will be provided separately with details to be provided in the Labor Management Procedure. PIU and the Local Governments respectively are responsible for establishing functioning GRM and informing stakeholders about the GRM role and function, the contact persons and the procedures to submit a complaint in the affected areas.

Information on the GRM will be available:

- on the websites of the MAFRD (<https://www.mbpzhr-ks.net>),
- on the notice boards and websites of Local Governments, municipalities and RIC 'Radoniqi Dukagjini',
- through social media campaigns,
- through online platforms.

8.1 Raising grievances

Effective grievance administration strongly relies on a set fundamental principle, designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective, easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the GRM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined. The access points and details on local entry points shall be publicized and shall be part of the awareness building once the locations of the Project are known.

8.2 Grievances administration

Any grievance shall follow the path of the following mandatory steps: receive, assess and assign, acknowledge, investigate, respond, follow up and close out.

Once logged, the GRM shall conduct a rapid assessment to verify the nature of grievances and determine on the severity. Within 3 days from logging, it will acknowledge that the case is registered and provide the grievant with the basic next step information. It will then investigate by trying to understand the issue from the perspective of the complainant and understand what action he/she requires. The GRM will investigate the facts and circumstances and articulate an answer. The final agreement should be issued and grievant be informed about the final decision not later than 30 days after the logging of the grievance. Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance was rejected, the results will be documented, actions and effort put into the resolution. If the grievance could not be resolved in amicable endeavor, the grievant can resort to the formal judicial procedures, as made available under the Kosovo national legal framework. Logging a grievance with the GRM does not preclude or prevent seeking resolution from an official authority, judicial or other at any time (including during the grievance process) provided by the Kosovo legal framework.

In case of anonymous grievance, after acknowledgment of the grievance within three days from logging, the GRM will investigate the grievance and within 30 days from logging the grievance, issue the final decision that will be disclosed on the respective website.

The GM shall keep a grievance register log, which will include grievances received through all admission channels, containing all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance.

8.3 Grievance and beneficiary feedback reporting

The role of the GRM, in addition to addressing grievances, shall be to keep and store comments/grievances received and keep the Central grievance log administered by the MAFRD. In

order to allow full knowledge of this tool and its results, quarterly updates from the GRM shall be available on the MAFRD official website. The updates shall be disaggregated by gender, type of grievances /complaints and presented at annual workshops which will be used as a feedback generator platform.

8.4 Constitution of GRM

MAFRD will add the role of GRM for this Project to the respective official websites, by the time public consultations on this SEP have been completed. This will allow any potential grievance to be addressed even at the planning stage. The Info Centre will be responsible for GRM administration, take any action necessary to address the grievance and inform the complainant about the outcome of the process, and maintain a data base of stakeholders, their responsible persons and representatives.

The existence of a GRM should not prevent citizens or communities from pursuing their rights and interests by seeking redress through the courts, administrative law procedures, or other formal dispute resolution mechanisms available.

8.5 Grievance Log

The MAFRD implementation unit should maintain grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

- Type,
- Category,
- Deadline for resolving the appeal, and
- Agreed action plan.

Each complaint should be assigned with an individual reference number and is appropriately tracked and recorded actions are completed. The log should contain the following information:

- Name of the grievant, location and details of the grievance.
- Date of submission.
- Date when the Grievance Log was uploaded onto the project database.
- Details of corrective action proposed,

- Date when the proposed corrective action was sent to the complainant (if appropriate).
- Date when the grievance was closed out.
- Date when the response was sent to the grievant.

8.6 World Bank Grievance Redress System

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

9. Monitoring and Reporting of the SEP

The results of the stakeholder engagement process will be included in the Project Monitoring Reports. These will be provided at a frequency as indicated in the ESCP. The monitoring reports will include the following information:

- Venue, time and date of any public consultation meetings that have been undertaken;
- Issues and concerns raised during the consultative meetings;
- A list of the number and types of grievances raised in the reporting period and the number of resolved and/or outstanding grievances; and
- Information on how the issues raised during the meetings and through grievances were/will be taken into consideration during the Project implementation (construction) Phase.

The Reports will also include a summary of implemented corrective measures meant to address the grievances.

d. Formal Meetings

All formal meetings, which are scheduled through the stakeholder engagement team will be documented and minutes taken. Minutes will be captured in English and Albanian by team members engaged (Social expert within PIU). Attendance registers / form will be maintained in appropriate formats.

e. Attendance Register / Form

A Stakeholders register form will be used to track the Consultation and Disclosure process. Specific stakeholder engagement actions will then be tracked in the registers / form, which contains the list of all stakeholders identified, under what category they fall, their importance to the project in terms of how they can influence or be influenced by the Project.

f. Record Keeping

A master database will be maintained by MAFRD to record and track management of all comments and grievances, and independently audited. This will serve to help monitor and improve performance of the Comment Response and, Grievance Redress Mechanism. This database will be continued throughout all phases of the Project.

10. Disclosure and Consultation requirements

Following a 14 days two-week disclosure window once endorsed by MAFRD and the WB, the draft SEP, shall be subject to public consultations. The SEP will be disclosed in Albanian and English at the website of the MAFRD together with invitations to the Public Consultations. Given the importance of the Project, its scale and geographical spread the public invitation shall be announced in a reputable printed media with national coverage to allow a wide range of Stakeholders to be included in the Consultation process. This will provide the Stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures and allow MAFRD to consider and respond to them.

The Invitation shall indicate how the document to be consulted on may be accessed, the Project details, date, time and venue of the consultations, and contact information details for feedback and /or questions.

Once the Consultations have been completed, Minutes of the Meeting shall be prepared and annexed to the SEP. The Minutes shall reflect on the feedback received, questions raised and how these were incorporated into the final document. The attendance of Stakeholders shall be verified through a signed attendance log, preferable with contact details of the attendees and photographs with permission to disclose.

Appendix 1: Grievance form

Reference No:

Full Name

Note: you can remain anonymous if you prefer, or request not to disclose your identity to the third parties without your consent. In case of anonymous grievances, the decision will be disclosed at the Projects website

First name _____

Last name _____

I wish to raise my grievance anonymously

I request not to disclose my identity without my consent Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).

By Post: Please provide mailing address:

By Telephone: _____

By E-mail _____

I will follow up the resolution at the website as I want to remain anonymous

Preferred Language for communication Albanian Other (*indicate*)

Description of Incident or Grievance (*What happened? Where did it happen? Who did it happen to? What is the result of the problem? Date of Incident/ Grievance*)

One-time incident/grievance (date _____)

Happened more than once (how many times? _____)

On-going (currently experiencing problem) What would you like to see happen to resolve the problem?

Signature: _____ Date: _____

Please return this form to: **Ministry of Agriculture, Forestry and Rural Development**

Appendix 2: Format table for documenting stakeholder engagement

Date/Venue:
Participants:
Stakeholders Concerns:
Proposal given from stakeholder/stakeholders:
How will these proposals be taken into account in project design/implementation:
Other Notes: