

STAKEHOLDER ENGAGEMENT PLAN
(SEP)
for
“Local Roads Connectivity Project”
Republic of North Macedonia



ВЛАДА НА РЕПУБЛИКА МАКЕДОНИЈА • GOVERNMENT OF THE REPUBLIC OF MACEDONIA
МИНИСТЕРСТВО ЗА ТРАНСПОРТ И ВРСКИ
MINISTRY OF TRANSPORT AND COMMUNICATIONS

October 2019

Document:
Stakeholder Engagement Plan for
“Local Roads Connectivity Project”
Republic of North Macedonia
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ABBREVIATIONS

AMSM	Auto Moto Union of Macedonia
E&S	Environmental and Social
ECP	Environmental Commitment Plan
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	environmental and social management plan
ESS	Environmental and Social Standards
FYR	Former Yugoslav Republic
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
LESIA	Limited Environmental Social Impact Assessment
LRCP	Local Roads Connectivity Project
LSGUs	Local Self-Government Units
MoF	Ministry of Finance
MOTC	Ministry of Transport and Communication
NGO	Non Governmental organization
OG	Official Gazette
OH&S	Occupational Health and Safety
OIP	Other Interested Parties
PE	Public Enterprise
PESR	Public Enterprise for State Roads
PIU	Project Management Unit
PLGO	Provincial Local Government Officer
PSGSDP	Public Sector Governance Service Delivery Project
RAP	Resettlement Action Plan
RM	Republic of Macedonia
RNM	Republic of North Macedonia
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
WB	World Bank
ZELS	Association of the Units of Local Self-Government

1 INTRODUCTION

1.1 INTRODUCTION

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process being implemented within the framework of the project “Local Road Connectivity Project (LRCP)”. The project has been initiated by the Central Government together with the Ministry of Transport and Communications, in order to support the municipalities in resolving the problem with the local road network based on the requirements of Republic of North Macedonia legislation and those of the World Bank (WB) which is considering financing the project.

The Ministry of Transport and Communications is proposing allocation of funds from the World Bank Loan for the implementation of the following project activities:

- upgrading of dirt roads/streets;
- reconstruction of the existing local roads/streets;
- rehabilitation of the existing local roads/streets;
- road safety measures
- climate vulnerability measures and road structures stability.

All above mentioned activities will be a part of Local Road Connectivity Project (LRCP) and will include only local roads in the territory of the Republic of North Macedonia.

According to the current situation, eligible for intervention can be considered streets in rural and urban areas particularly the ones that offer quality and safety access to schools, hospitals, sport centers, market facilities, religious institutions, public institutions and authorities as well as local roads connecting village to village / town / settlement.

In order to address Project’s potential environmental and social concerns in accordance with the requirements of the World Bank Assessment and Management of Environmental and Social Standards, the Ministry of Transport and Communications (MTC) as the responsible national body has prepared this Environmental and Social Management Framework (ESMF) and the Resettlement Policy Framework (RPF) for the whole project.

According the national legislation for the sub-projects will be prepared EIA Reports and according the WB requirements for “Projects with substantial risk” will be prepared an Initial Limited Impact Assessment (LESIA) and ESMP Checklist for the “Projects with moderate risk”. These due diligence instrument will ensure in time identification of possible environmental and social risks/impacts and appropriate measures for avoidance or mitigation will be proposed and implement in construction phase.

1.2 PURPOSE OF THE SEP

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a projects environmental and social risks. Communicating early, often, and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays. In addition, the plan assists in managing stakeholder expectations which will have a bearing throughout the lifespan of the project. Hence, this SEP provides a plan to interact effectively with stakeholders to support project interests.

The objectives of the SEP are identification of the project stakeholders at different stages of development and establishment of their rules for management of exchange of information between the PIU and the stakeholders in line with the national regulation and the WB Requirements.

The purpose of the SEP is to present how the MoTC/PIU plans to communicate with stakeholders who may be affected by or will be interested in the LRCP Project throughout the whole project life cycle. It also describes a grievance mechanism, which is a process stakeholders may use to raise any concerns about the Project providing their opinions that may influence the Project implementation and its results.

The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the LRCP Project, and to carry out stakeholder engagement in line with the laws of Republic of North Macedonia, as well as the requirements of World Bank. SEP will have an important role for successful implementation of the LRCP project.

Overall, SEP serves the following purposes: a) stakeholder identification and analysis; b) planning engagement modalities and effective communication tool for consultations and disclosure; and (c) enabling platforms for influencing decisions; (d) defining role and responsibilities of different actors in implementing the Plan; and (g) grievance redress mechanism (GRM).

The SEP will be disclosed before starting of the project activities

1.3 SCOPE AND STRUCTURE OF THE SEP

This document is a general SEP with general guidance on how to involve the public in all phases of projects, from their approval to their implementation. The annexes will provide relevant information for each call/expression of interest from the municipalities to join the PLRC Project separately.

Scope of the SEP shall be as outlined in the World Bank's ESS10. The engagement will be planned as an integral part of the project's environmental and social assessment and project design and implementation.

The Stakeholder Engagement Plan consists of the following Chapters:

1. Project Description
2. Description of the Administrative, Policy and Regulatory Framework
3. Previous Stakeholder Engagement Activities
4. Stakeholder Identification and analysis
5. Stakeholder Engagement Program
6. Resources and Responsibilities for implementing the Stakeholder Engagement Plan
7. Grievance Redress Mechanism
8. Monitoring and Reporting

Update of the SEP document

After selecting of sub project, an update of the SEP will be carried out (It will be included in Annex of this general SEP, focussing on particular municipality/ies and the public hearings events will be defined, the disclosure package content and mechanism of engagement of stakeholders.

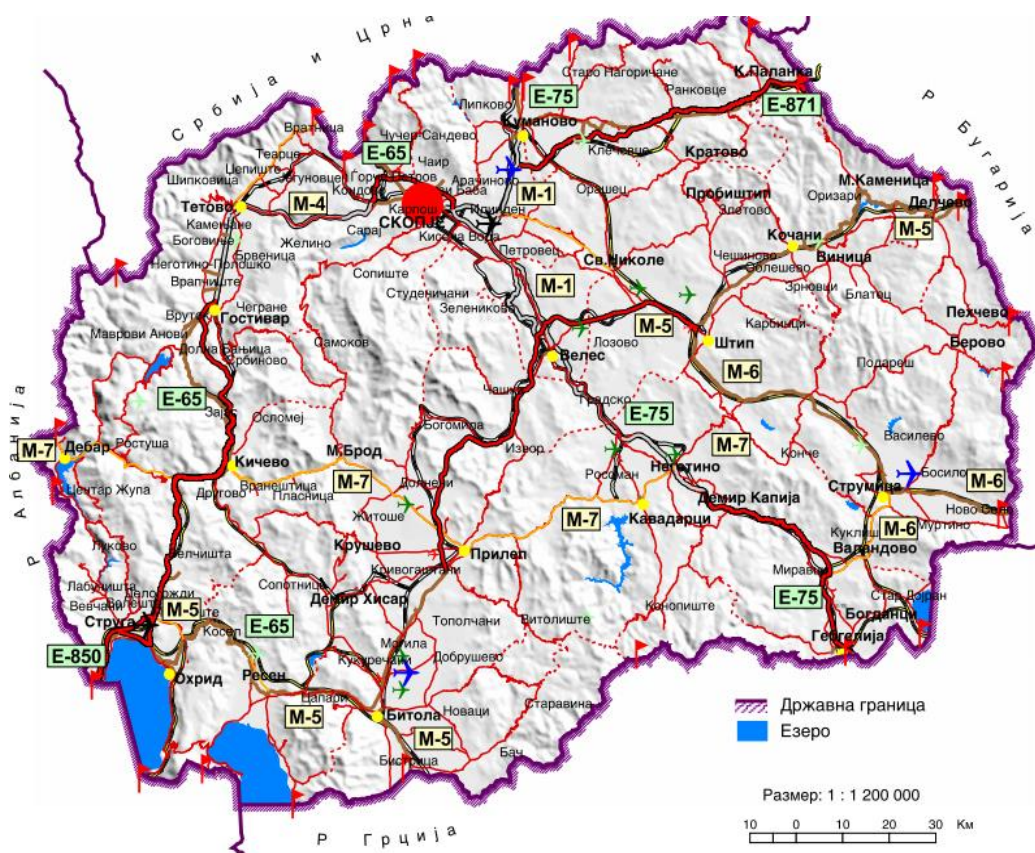
2 PROJECT DESCRIPTION

Overview of the road network in RNM

The national and regional roads network connects the surrounding countries through the Trans National Corridors VII and X which in turn increases the volume of transport.

According to the Law on Public Roads the road network administratively is divided on national, regional and local roads. The national and regional roads are under the competence of the Agency for State Roads, while the local roads are under the competence of the Municipalities or the City of Skopje i.e. the Units of Local Self Government.

The total length of the road network in the RNM is 13.186 km out of which 8.496 km are local roads. Road network map in the Republic of North Macedonia is shown on the following Figure 1.



(Source: National Spatial Plan)

Figure 1 Road network in the Republic of North Macedonia

The transport sector is characterized with poor condition of the local roads network, unsatisfactory level of financing of road maintenance, weakness of international investment in distribution sector and transport sector etc. Such poor condition of the local roads is as a result of lack of financial capacity of the Local Self Government that differs from Region to Region in the Country. Some of the local roads in the rural areas are in an unacceptable condition with no access to the hospitals, schools and markets so this issue brings social problems as well.

Many LSGUs in the recent years addressed this issue to the Government in order to find a solution and to help with financing in local roads construction, reconstruction and maintenance and designing safe and sustainable traffic solutions. The Government, in order to support the municipalities in resolving

the problem with the local road network, in the past years has implemented several projects for construction, reconstruction and rehabilitation of local roads.

The Ministry of Transport and Communications is proposing allocation of funds from the Loan (70 million euros) by the World Bank for the purpose of financing reconstruction and rehabilitation of the existing ones, upgrading of existing dirt roads/streets to paved/asphalt, introducing road safety measures like pedestrian paths along one or both sides of the streets/local roads, electrification, construction of drainage systems, etc. as well as measures that address climate vulnerability and road structures stability.

The LRCP will support different activities depending on the type of the sub-project submitted by the LSGUs, some examples are:

- construction/upgrading of the existing local dirt roads/streets;
- soil improvement, embedding of crushed stone material, setting a tampon layer construction of culverts, shoulders, construction of drainage canals for storm water, asphaltting the road;
- reconstruction of the existing local roads/streets;
- minor corrections, extensions, straightening curves, asphaltting the part of the road;
- rehabilitation of the existing local roads/streets;
- improving the condition of the road without changing the basic functional characteristics – removing of damaged asphalt, cleaning of water channels, asphaltting, etc.);
- road safety measures (for ex. apply the traffic signalization, construction of pedestrian paths, post the electrification cables, paths to the bus station, urban equipment , etc.)
- slope stabilization and construction of storm water channels/culverts/drainage canals on the roads to address climate vulnerability as well as improvement the stability of small local roads/streets bridges.

All of the above mentioned different types of activities will require a different time frame for their implementation.

The Project activities belongs to “Projects with substantial risk” and “Projects with moderate risk” according the World Bank risk categorization.

The Local Road Connectivity Project will not financially support activities for the construction of new local roads/streets.

3 DESCRIPTION OF THE ADMINISTRATIVE, POLICY AND REGULATORY FRAMEWORK

3.1 NATIONAL LEGISLATION REQUIREMENTS

According to the *Law on Environment*¹, public disclosure and consultation activities should be carried out during the full environmental impact assessment (EIA) procedure. The relevant procedures for disclosure and consultations include the following steps:

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

The LRCP belongs to the category of activities for which an EIA Elaborate Report should be prepared (not a full-scale EIA procedure), so for the lower category projects the public disclosure and consultation is not mandatory according the national legislation.

Throughout the **process of development and adoption of urban and spatial planning documents** (which is in line with the *Law on Urban and Spatial Planning*²), the public must also be informed and consulted.

According to the Law on construction (OG of RM no. 130/09, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 70/13, 79/13, 137/13, 150/13, 163/13, 27/14, 28/14) - Decision for Approval of the EIA Report is a precondition for approval of infrastructure projects.

Article 16 of the Constitution of Macedonia guarantees "access to information and the freedom of reception and transmission of information".

The Law on Free Access to Information of Public Character (Official Gazette of RM" No. 13/06, 86/08, 06/10, 42/14) allows individuals and legal entities to obtain information from state and municipal bodies and all others who are performing public functions.

In 1999, FYR Macedonia ratified the **Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters**. The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and transboundary environment. Article 2(c) of the Convention states that the Convention applies not only to government at all levels, but also to "any other natural or legal persons having public responsibilities or functions, or providing public services, in relation to the environment, under the control of [a public authority]." In line with the Convention, the Company is required to: respond to requests from the public for environmental information (any member of the public can make a request, regardless of citizenship, nationality or domicile); regularly collect and disclose environmental information to the public and notify the public that the information is available; and provide information for emergencies.

¹ O.G. of FYR Macedonia, No. 53/2005, with the latest amendments in 99/18

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

3.2 World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank developed an Environmental and Social Framework setting out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. The Environmental and Social Standards (ESS) set out the mandatory requirements that apply to the Borrower and projects. They present set of obligatory guidelines and instructions with the main objective to foster efficient and effective identification and mitigation of potentially adverse environmental and social impacts that may occur in the development projects, with proper stakeholder engagement and sustainable management.

3.3 STAKEHOLDER ENGAGEMENT ESS10

One of the established WB standards that the Borrower and the sub - projects will meet through the project life cycle is ESS 10 , "Stakeholder Engagement and Information Disclosure", that recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". Specifically, the requirements set out by ESS10 are the following:



- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will 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 process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

A Stakeholder Engagement Plan 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.

4 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

In order to determine priorities for developing and investing in transport infrastructure RNM in 2018 prepared a National Transport Strategy.

The National Transport Strategy was publicly available before the adoption by the Government of RNM in December 2018. Ministry of Transport and Communications has organized public hearing event for the National Transport Strategy in order to collect comments by the public and to incorporate the relevant ones in the document. In parallel with preparation of the National Transport Strategy, MoTC also conducted the Strategic Environmental Assessment procedure.

The main priorities arising from the National Transport Strategy were investing in improving the local road infrastructure which is in very poor condition. This conclusion was the reason for the Government of the Republic of North Macedonia to start with the preparation and implementation of the Local Road Connectivity Project.

Regarding the implementation of the LRCP project Ministry of transport and communications organized several consultative meeting in April 2019, with the all municipalities in order to familiarize them with the manner of realization of the LRCP project.

The Ministry of Transport and Communications had prepared Announcement and Agenda for the consultative meetings on 18.04.2019, 19.04.2019, 22.04.2019 and 23.04.2019. During the 4 days consultative meetings, many participants from the municipalities were present and they were all satisfied and interested about the project activities, what will be the municipalities obligations and with what dynamics project activities will be implemented.

During the meetings, the representatives from the Ministry of Transport and Communications informed the representatives from the Municipalities about the purpose of the Local Roads Connectivity Project, potential selection and eligibility criteria, project financing, project implementation, as well as the responsibilities of the Municipalities during the project implementation. Municipalities should prepare project documentation, nominate a focal point/Project Manager from the municipal staff that will be responsible for project supervision in charge of the Municipality and attending the regular progress meetings and the monitoring committees meetings if any. Representatives from the Municipalities were mainly interested about the type of sub-project activities/works eligible for financing, activities for treatment of damages on the local roads due to climate vulnerability (flooded roads, dangerous stability of some small local bridges, slope stabilization etc.), road safety issues as well as the treatment of the sub-projects with expropriation issues.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

The WB ESS 10 recognizes two broad categories of stakeholders:

- **Project Affected Parties and**
- **Other Interested parties**
- **Disadvantaged / vulnerable individuals or groups.**

Project-affected parties includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities. 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” (OIPs) refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups.

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or **vulnerable individuals or groups**, who often do not have a voice to express their concerns or understand the impacts of a project.

Vulnerable individuals or groups for LRCP - (people with low social standard – unemployed persons, single parents; people with disabilities, old people, Roma people, individual farmers) from the affected Municipalities and surrounding settlements. This group of people for project activities are usually informed by representatives of their settlements in municipal or local councils, local communities and municipalities. Regarding the presence on the public hearing events may have difficulty in summer because for most of the population in rural areas agriculture is the main activity and income generator. It is necessary to make an analysis for each municipality separately regarding the representation of vulnerable groups, the existence of NGOs, medical professionals working with people with disabilities, and then to apply appropriate measures according to the needs of the vulnerable people in each municipality and to get their opinion on the project activities. The main responsible institution for LRCP project implementation - Ministry of Transport and Communications in the previous period held meetings only with the representatives of almost all local governments in the country.

5.1 STAKEHOLDER MAPPING

Stakeholder is defined as an individual/ institution (agency) that can impact upon or get impacted by the LRCP project.

In order to define a communication process with the stakeholders, several groups that may be interested and/or affected by the project implementation have been identified and they are presented on Figure 2.

The reason being that there are various issues that are likely to concern different stakeholders and so different types of stakeholder have been grouped based on their influences to the project.

Early understanding of the influences or connections of a stakeholder group to the project assists in the identification of the key objectives in engagement. In this regard a stakeholder mapping exercise

was undertaken to identify the importance of each stakeholder, assesses the influence that stakeholders have over a project and/or the way project activities will potentially affect stakeholders. As the project evolves, other stakeholder groups may be identified and engaged.

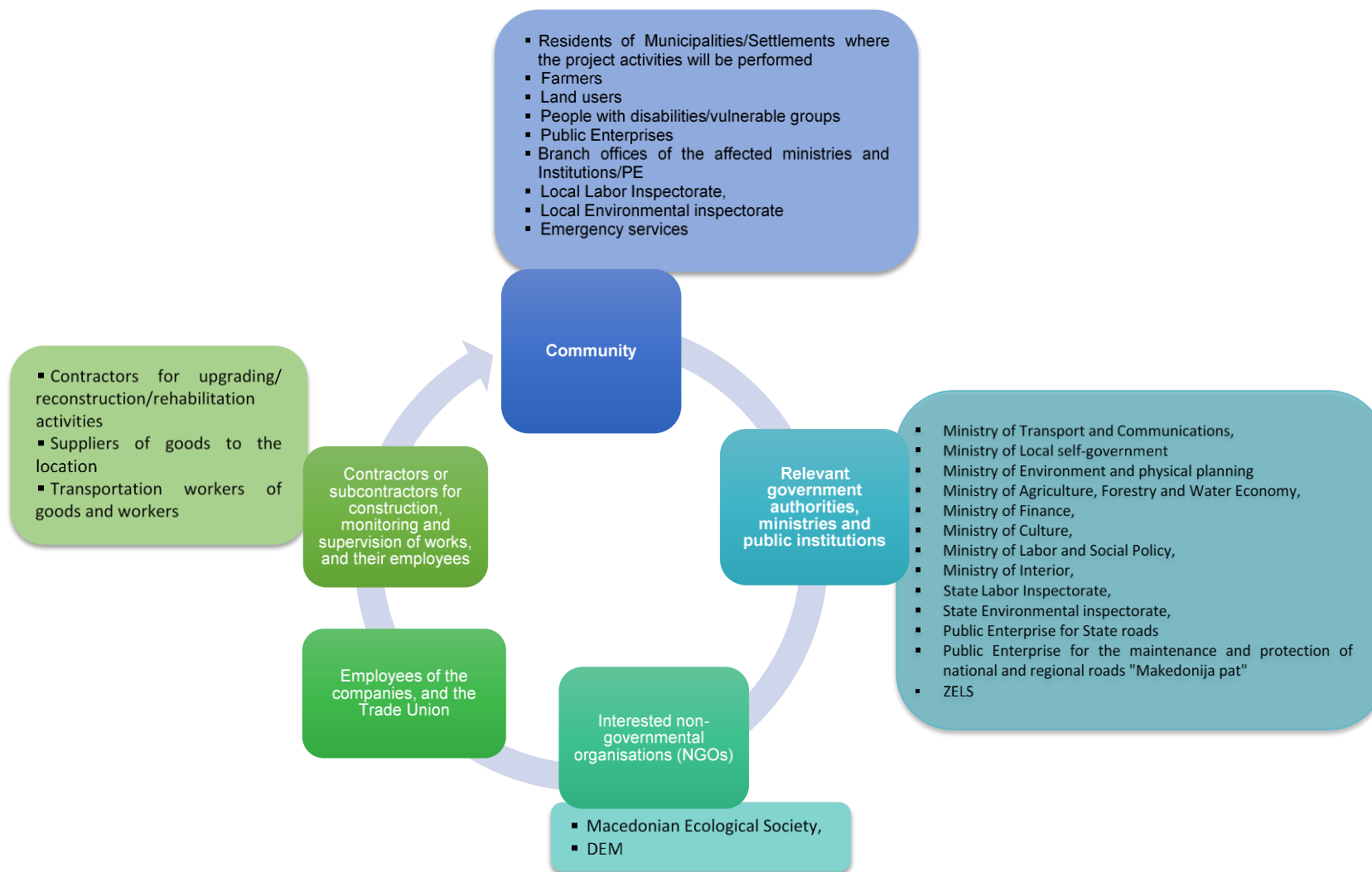


Figure 2 Identified stakeholders group within the LRCP project

Stakeholders have their responsibilities according to which they are divided into separate groups, different responsibilities are described for each group in the following table.

Table 1 Relevant stakeholders and their responsibilities for the LRCP project

Stakeholder Category	Sub group/ Department Sector	Responsibilities
Affected parties	Governments and regulatory bodies and public companies Ministry of Transport and Communications, Ministry of Local self-government Ministry of Environment and physical planning Ministry of Agriculture, Forestry and Water Economy, Ministry of Finance, Ministry of Culture, Ministry of Labor and Social Policy, Ministry of Interior, State Labor Inspectorate, State Environmental inspectorate, Public Enterprise for State roads Public Enterprise for the maintenance and protection of national and regional roads "Makedonija pat" ZELS	<ul style="list-style-type: none"> - Ensuring proper and effective implementation of the SSIP project regarding national legislation and WB requirements, - Raising remarks upon construction activities, - Ensuring safety during construction activities, - Ensuring environmental protection during the execution of the work.
	Community Residents of Municipalities/Settlements where the project activities will be performed Farmers Land users <hr/> – Contractors for construction/reconstruction/upgrading/rehabilitation activities Suppliers of goods and services Transportation workers <hr/> – People with disabilities/vulnerable groups(people with low social standard – unemployed persons, single parents; people with disabilities, old people, Roma people, individual farmers)	<ul style="list-style-type: none"> - Support the MoTC for efficient implementation of the LRCP, - Active participation during the project implementation. <hr/> <ul style="list-style-type: none"> - Implementation of good construction practice, OH&S measures and environmental protection, - Quick intervention and elimination of consequences from adverse incidents, - Efficient and timely execution of construction work. <hr/> <ul style="list-style-type: none"> - Expressing their opinions, suggestions and specific proposals during the implementation of project activities
Other interested organizations and	Non governmenta I organizations and	National and local environmental and social NGOs
		Following the implementation of the LRCP project and raising concerns regarding the environmental and social issues that needs to be overcome.

Stakeholder Category	Sub group/ Department Sector	Responsibilities
professional organizations		
Affected parties	Local and regional authorities	<ul style="list-style-type: none"> - Support the MOTC and PIU for efficient implementation of the LRCP, - Adoption of the technical documentation for the realization of the project, - Issuing the Decision for approval of the EIA Report/Elaborate, - Supervision of the construction activities, - Ensuring the proper access of the population to their homes, - Providing alternative roads while performing the project activities, - Ensuring the full implementation of the OH&S and environmental standards during the construction activities.
	Financial institutions and private companies	<ul style="list-style-type: none"> - Providing financial support for realization of the project, - Following the implementation of the OH&S and environmental standards in all project phases, - Public participation according to the WB ESS 10, - Implementation of the OH&S and environmental standards in all project phases.
Other interested parties	Other interested stakeholders	<ul style="list-style-type: none"> - Publicity of the project through TV station, radio station, social media, newspaper - Providing information on the dynamics of performing the project activities, - Providing information about delays on certain local roads during the execution of project activities, - Professional and efficient execution of the project activities in accordance with the Dynamic Plan.
	Other interested parties	<ul style="list-style-type: none"> - Media - General public - Workers - Associations of the Transport Companies of the Republic of Macedonia "MAKAM-TRANS" - Economic Chamber of RNM – Macedonian Transport Association - AMSM - Auto Moto Union of Macedonia - PE "Makedonski sumi" - PE "Makedonski zeleznici"

List of stakeholders during the project implementation will be continuously updated and they will be incorporated in the SEP document.

MoTC will discuss different issues with each group of stakeholders depending on their role, responsibility and importance as stakeholder. The following table contains the main issues that will be discussed with different stakeholders.

Figure 3 Key issues to be discussed with different groups of stakeholders



A variety of communication methods will be used as appropriate for each set of stakeholders. In general, these include: a) Public and individual meetings, b) Announcements in media, c) Provision of general information on notice-boards at public locations, d) Regular mail and email correspondence and Publication of relevant project information on the website of the Ministry of Transport and Communications.

For different stakeholder groups different techniques will be use in all project phases and they are detailed described in Table 2.

Table 2 SEP Techniques for each stakeholder group

Stakeholder group	Engagement Technique	Project phase
Community	<ul style="list-style-type: none"> Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board in the branch offices of the Municipalities at least two weeks prior to the start of any construction works, 	<ul style="list-style-type: none"> Before starting with implementation of the project activities
	<ul style="list-style-type: none"> Public consultation meeting, and individual meetings as necessary, 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works
	<ul style="list-style-type: none"> Informing through the media – radio/TV/social media (announcements), 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works
	<ul style="list-style-type: none"> Direct information through the local authorities Communication through bulletin boards (placed in appropriate places) and posting project information/notices there 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works During the operation the reconstructed / rehabilitated streets / roads
	<ul style="list-style-type: none"> Group meetings with households 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works During the operation the reconstructed / rehabilitated streets / roads
	<ul style="list-style-type: none"> Direct communication with residents, companies etc., 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works During the operation the reconstructed / rehabilitated streets / roads
	<ul style="list-style-type: none"> Direct information via a contact person or person responsible for the implementation of the SEP. 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works

Stakeholder group	Engagement Technique	Project phase
		<ul style="list-style-type: none"> During the operation the reconstructed / rehabilitated streets / roads
Relevant government authorities, ministries and public institutions	<ul style="list-style-type: none"> Official correspondence 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works During the operation the reconstructed / rehabilitated streets / roads
	<ul style="list-style-type: none"> Meetings, public hearings 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works
	<ul style="list-style-type: none"> One on one meetings. 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works
Interested non-governmental organisations (NGOs)	<ul style="list-style-type: none"> Public consultation meetings, and individual consultation, meetings as necessary 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works During the operation the reconstructed / rehabilitated streets / roads
	<ul style="list-style-type: none"> Direct email communication 	
	<ul style="list-style-type: none"> Media/ press releases. 	
Employees of the Company and the Trade Union	<ul style="list-style-type: none"> The Company's internal communication channels, Trainings as necessary. 	<ul style="list-style-type: none"> Before starting with implementation of the project activities During the construction works
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees	<ul style="list-style-type: none"> Information through tender procedure and Contracts 	<ul style="list-style-type: none"> Before starting with implementation of the project activities
	<ul style="list-style-type: none"> Communication via supervising engineers 	<ul style="list-style-type: none"> During the construction works
	<ul style="list-style-type: none"> Toolbox talks at construction sites on health and safety topics 	<ul style="list-style-type: none"> During the construction works
	<ul style="list-style-type: none"> Monthly reports on progress of works to be submitted by contractors during construction works 	<ul style="list-style-type: none"> During the construction works
	<ul style="list-style-type: none"> Trainings. 	<ul style="list-style-type: none"> During the construction works

During the whole life of the project, ethnic and cultural diversity of the citizens should be taken into consideration, especially for their engagement on the project and organizing meetings and public hearing events.

Prior to any engagement event the following actions will occur:

- Selection of individual stakeholders with whom engagement will occur;
- Selection of methods for disclosure of information (including such topics as format, language, and timing);
- Selection of location and timing for engagement event (avoiding busy work times, which may be seasonal, and days/times when special events may be occurring due to ethnic and cultural issues);

- Agreeing mechanisms for ensuring stakeholder attendance at engagement event;
- Identification and implementation of feedback mechanisms to be employed.

6 STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement activities will be ongoing through the whole life cycle of the Project, (Project's preparation, construction and operation).

For the LRCP stakeholders will be engaged as early as possible and will continue the engagement throughout the planning, implementation until the project is finished.

The nature and frequency of follow up consultations will be different depending on the subprojects will develop.

Before starting of the LRCP Project, all affected parties will be informed about the Project's scope and contact information which they can address for further information. They also will be informed about the availability of the publicly available information on the MoTC website as well as at the Municipalities Information boards or websites.

Key communication principles are to:

- Keep the community and key stakeholders informed in advance of project progress.
- Encourage community participation.
- Ensure 'no surprises' to key stakeholders and the community.
- Listen to feedback, investigate suggestions and adopt them where possible.
- Transparency.

The LRCP team recognize that being open, listening to the community, and ensuring that the community understands proposed construction methods and timelines is the best approach to building effective relationships with the community to assist minimize project impacts.

Productive relationships with Municipalities and the Environmental and Social Specialist will assist the LRCP Project team to minimize impacts associated with the project. The LRCP team will regularly contact with Municipalities (Borrowers) to discuss works that will impact pedestrian access, traffic and parking flows, urban design and other items that may be of interest or impact to the local community.

6.1 RESPONSIBILITY FOR SEP IMPLEMENTATION

A Project Implementation Unit (PIU) will be established within the MoTC, which will be responsible for overall LRCP implementation, including the implementation of this SEP, under the supervision of the Lenders. The PIU will consists of Project Director and PIU officers.

The PIU Environmental and Social Specialist shall be the responsible person for implementation the SEP document during the entire Project cycle, and in charge of communicating with the communities.

All contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of SEP. The grievance mechanism requirements will be laid out in the tender documentation and contracts signed with the Contractors.

6.2 PROPOSED STRATEGY FOR INFORMATION DISCLOSURE

The Ministry of Transport and Communications intends to provide all relevant information for the LRCP project to the public (social media, local TV and radio stations). All interested and affected parties will be able to find the following documents on the MoTC website (www.MoTC.gov.mk) and the Municipality (Borrower) website:

- ***Environmental and Social Management Framework (ESMF) for LRCP;***
- ***Resettlement Policy Framework (RPF) for LRCP;***
- ***Stakeholder Engagement Plan (SEP) for LRCP including grievance mechanism;***
- ***Environmental and Social Due Diligence instruments that will be developed for each sub-project (Initial Limited Environmental and Social Impact Assessment - LESIA /Environmental and Social Management Check Lists – ESMP Check Lists);***
- ***Environmental Commitment Plan (ECP).***

These documents will remain in the public domain for the duration of the Project. The SEP will be periodically updated.

All information regarding LRCP project shall be available on the MoTC website, also on Municipalities Information Boards that will serve as a media tool/channel for communications with the local residents. Information in relation to the Grievance Mechanism will also be included (see below). Stakeholders, including the public, will also be able to use the Grievance Mechanism. Furthermore information regarding the Grievance Procedure will also be widely disseminated to affected municipalities and affected local communities.

Information prior and during project implementation will be made available through brochures, in the Municipalities and regions where activities will be conducted. Most of the Municipalities have local community radio stations, therefore, information will be transmitted through these radio stations.

The MoTC through the Municipalities will be responsible for disclosure of commencement of the project, SEP and GRM so that the community is made aware of channels to bring out their complaints.

Regarding the WB requirements for environmental protection for the project that are classified with **substantial risk** LESIA document will be prepared, while for the projects that are classified in **moderate risk ESMP Checklist** will be prepared.

Prepared documents regarding the environmental protection ESMF and RPF and LESIA/ESMP Checklist will be publicly available on the MoTC website for submitting comments within 14 days.

Public hearing event will be organized for ESMF and RPF and for the sub-projects with substantial risks/impacts, the prepared LESIA will be presented on public hearing event. The announcement for organization of public hearing event for draft version of ESMF and RPF will be published in two newspapers (Macedonian and Albanian languages).

The event will be organized during the 14-day period specified for the availability of the ESMF and RPF or LESIA document. If necessary, separate meetings will be held to ensure that the stakeholder engagement is gender responsive.

The PIU from MoTC will carry out public consultations through organizing public hearing events. For that purpose Project disclosure package should be prepared and should contain following documents:

Disclosure package for draft versions of ESMF and RPF:

- Public Announcement for organization of the public hearing events for prepared ESMF and RPF (published in two newspapers in Macedonian and Albanian languages, on the web site of the MoTC);
- Draft version of ESMF and RPF documents;
- Agenda for public hearing events;
- Minutes of Meeting from the organized public hearing event;
- Final version of the ESMF and RPF including the MoM for the public hearing event, List of participants and public announcements.

Disclosure package for draft versions of Initial Limited Environmental and Social Impact Assessment (LESIA) document for sub-projects with substation risks/impacts:

- Public Announcement for organization of the public hearing events for prepared LESIA document;
- Draft version of Initial Limited Environmental and Social Impact Assessment (LESIA) document developed for each sub-project;
- Form for submitting comments and suggestions site specific LESIA document;
- Agenda for public hearing events;
- Minutes of Meeting from the organized public hearing event;
- Final version of the LESIA document including the MoM for the public hearing event, List of participants and public announcement.
- Grievance form to be used during the construction of the sub-project.

Disclosure package for draft versions of ESMP Checklist for project with moderate risks/impacts:

- Draft version of ESMP Check List document developed for each sub-project;
- Form for submitting comments and suggestions site specific ESMP Check List;
- Final version of the ESMP Check List based on received comments by the stakeholders
- Grievance form to be used during the construction of the sub-project;

The disclosure package (Figure 4) will be publicly available in Macedonian and for some sub-projects in Albanian language immediately upon its availability, on the websites of the relevant Municipalities (on the which territory the Project will be implemented), and the MoTC (www.MoTC.gov.mk).

After the 14-day period for submitting comments for the prepared documents (ESMF and RPF/LESIA/ESMP Checklist) and after the conducted public hearing event for ESMF and RPF and LESIA, the submitted comments will be included in the final version of the relevant document and they will be posted on the MoTC web site.



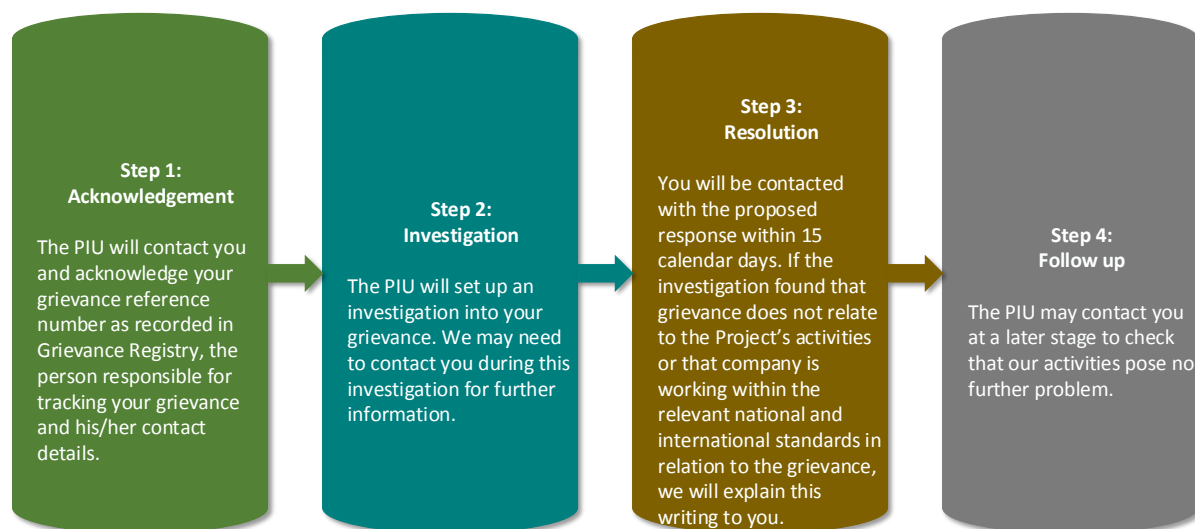
Figure 4 Disclosure package for each Environmental and Social documents developed under the LRCP

7 GRIEVANCE MECHANISM

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project. Dedicated communication materials (GRM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures. A GRM guidebook/manual will also be developed and suggestion boxes installed in each affected municipality. In order to capture and track grievances received under the project, a dedicated GRM Management Information System/database/ register is planned. The MoTC PIU's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GRM committee works, both in terms of process and deadlines.

PIU within the MoTC will implement a Grievance Mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. A grievance mechanism will be implemented to ensure that the PIU/Contractor is responsive to any concerns and complaints particularly from affected stakeholders and communities.

The PIU will go through the following steps to deal with the grievance:



Any comments or concerns can be brought to the attention of the company verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available in the Municipalities offices that are easily accessible for all relevant stakeholders, alongside a description of the grievance mechanism as well as on the construction sites.

The following timeframe will be used:

- ✓ Written acknowledgement of receipt of the grievance: within 5 days of receiving the grievance;
- ✓ Proposed resolution: within 15 days of receiving the grievance.

Specifically nominated and trained members of staff will record grievance information in a grievance log. This will include:

- Stakeholder name and contact details;
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

For each Initial Limited Impact Assessment and ESMP Checklist PIU within the MLSP will establish **Form for submitting comments and suggestions on the LESIA/ESMP Checklist** (Annex 1) and Form will be published together with the prepared LESIA document for each Municipality.

For the purposes of receiving comments from the stakeholders PIU will establish **Grievance Form for the construction phase of the project** that will be available in printed and electronic form. Printed version will be available at the construction site in each Municipality where the construction activities will be performed.

The Grievance Form for the construction phase of the project (Annex 2) will be revealed on the:

- Websites of the Ministry of Transport and Communications (<http://www.mtc.gov.mk/>) and relevant Municipalities, where the project activities will be implemented; and
- Available printed copies in the premises of the relevant Municipalities (when the construction work activities will start) and the premises of the local communities, located near the project areas;

The grievance can also be submitted directly to the Contractor that will forward any such received concerns/comments to the PIU without postponement to allow the PIU (within MToC) to further process the concerns/comment (i.e. verify, acknowledge and respond to the grievance in the timeframes defined below). The Contractor is obliged to hand out the Project Grievance - explain the grievance mechanism to the concerned citizen(s)/local population and forward the filled-in Grievance Form to the PIU, but also, to undertake all proposed corrective actions to react on received grievance.

All complaints will be verified by the PIU in the Grievance Registry and assigned a number, and acknowledged within 15 calendar days (the flowchart for processing complaints is enclosed in Annex D). The Registry will have all necessary elements to disaggregate the grievance by gender of the person submitting it as well as by type of grievance. Each grievance will be verified in the registry with the following information: a) description of grievance, b) date of receipt of grievance and when acknowledgement returned to the complainant; c) description of actions taken (investigation, corrective measures, and preventive measures); d) date of resolution and closure provision of feedback to the complainant.

In cases when the grievance/complaint is indefinite or not clear enough, the PIU will assist and provide advice in formulating/redrafting the submission, in order for the grievance/complaint to become clear, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project.

If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 25 calendar days upon the acknowledgement of grievance. In situation when the PIU is not able to address the particular issue verified through the grievance mechanism or if action is not required, it will provide a detailed explanation/ justification on why the issue was not addressed. The response will also contain an explanation on how the person/ organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory. At all times, complainants may seek other legal remedies in accordance with the legal framework of Republic of North Macedonia, including formal judicial appeal.

For the workers, which will be engaged for the implementation of the project activities, a separate grievance mechanism will be available.

The process is shown in Figure 5.

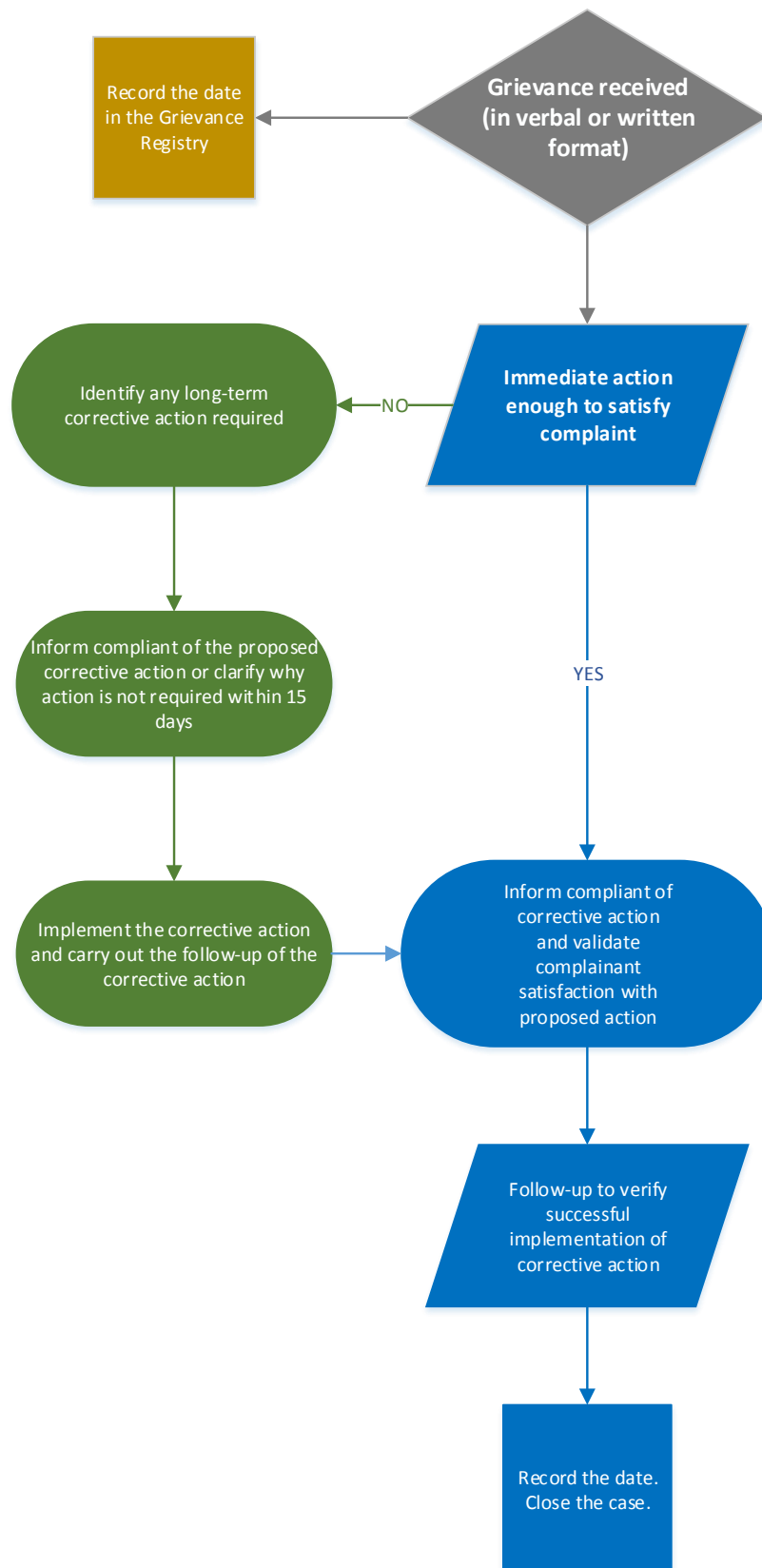


Figure 5 Steps within the Grievance procedure

Information Boards at Municipalities and construction sites

Information boards in each Municipality will provide local residents with information on stakeholder engagement activities, construction updates, contact details for the Contractors etc. The Contractors will set up information desks/boxes, on the construction sites on visible and easily accessible places where they can meet and share information about the project and receiving grievances.

7.1 GRIEVANCE LOG

The Grievance Focal Points will maintain local grievance logs 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 of appeal;
- Category of appeal;
- People responsible for the execution of the appeal;
- Deadline of resolving the appeal;
- Agreed action plan.

The PIU Environmental and Social Specialist and focal points will ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. The log should contain the following information:

- Name of the PAP, his/her location and details of his / her complaint;
- Date of reporting by the complaint;
- Date when the Grievance Log was uploaded onto the project database;
- Details of corrective action proposed, name of the approval authority;
- Date when the proposed corrective action was sent to the complainant (if appropriate);
- Details of the Grievance Committee meeting (if appropriate);
- Date when the complaint was closed out;
- Date when the response was sent to the complainant.

7.2 MONITORING AND REPORTING ON GRIEVANCES

Monitoring and evaluation of the stakeholder process is important to ensure MoTC is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. The following characteristics/commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement;
- Inclusivity (inclusion of key groups) of interactions with stakeholders;
- Promotion of stakeholder involvement;
- Sense of trust in MoTC shown by all stakeholders;
- Clearly defined approaches; and

- Transparency in all activities.

PIU has an obligation to prepare Monitoring Reports.

The first report will be Semi Annual Report for environmental and social aspects and reports from the public hearings events

Field Coordinators will be responsible for:

- Collecting data from the construction sites on the number, substance and status of complaints and uploading them into the single regional database;
- Maintaining the grievance logs on the complaints received at the regional level;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GRM mechanisms to the PIU Environmental and Social Specialist.

The PIU Environmental and Social Specialist will be responsible for:

- Summarizing and analyzing the qualitative data received from the Field Coordinators on the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GRM mechanisms to the PIU Environmental and Social Specialist.

PIU within the MoTC will submit biannually Reports to the WB, which shall include Section related to GRM which provides updated information on the following:

- Status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on number of received grievances \ (applications, suggestions, complaints, requests, positive feedback), highlighting those grievances related to the WB ESS 2 and 5 and number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
- Level of satisfaction by the measures (response) taken;
- Any correction measures taken.

Community Relations/Liaisons Manager, if engaged, would be responsible for:

- Establishes good relationship with all identified stakeholders;
- Organize the public hearing events for sub – projects
- Notice the stakeholder's comments on sub-projects and records their appeals
- Prepare Semi Annual Reports and submit to the Project Director.

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

7.3 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

8 IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT

8.1 IMPLEMENTATION ARRANGEMENTS

Implementation of the SEP will be conducted through the Project Implementation Unit (PIU). The PIU is headed by the Project Director who is the responsible person for the overall LRCP implementation. The PIU Environmental and Social Specialist is the responsible person for implementation of the SEP during the entire Project cycle, and in charge of communicating with the communities. A responsible person Community Relations/Liaisons Manager has to be appointed, if needed, to assist the PIU Environmental and Social Specialist in charge of communicating with the stakeholders.

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

8.2 ROLES AND RESPONSIBILITIES

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of the PIU Environmental and Social Specialist.

Table 3 Stakeholder Analysis and Communication Requirements

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
Contractors and sub-contractors	Stakeholders of high significance for the Project's success who are directly or indirectly engaged in Project implementation. The following issues need to be discussed with employees and contractors/subcontractors: occupational health and safety (PPE for all persons on site, license to work or drive the specific vehicles, first aid trainings, first aid kits on site, firefighting equipment, etc.), community health and safety (driving speed, vehicle safety, noisy mechanization, etc.	Provision of Project code of conduct and work safety and health regulations, environmental protection requirements	<ul style="list-style-type: none"> Information through tender procedure and contracts Communication via supervising engineers Toolbox talks at construction sites on health and safety topics Monthly reports on progress of works to be submitted by contractors during construction works Trainings
Local residents in the vicinity of the planned sub – projects	During construction, machinery and heavy vehicles on local roads will generate noise that may temporarily impact on local population The transport and traffic safety need to be discussed with the local residents and the type of driving and vehicle safety with the employees and contractors.	Providing timely information on risks and disturbances associated with the construction and operation.	<ul style="list-style-type: none"> Public consultation meeting, and individual meetings as necessary Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the board in the offices of the relevant Municipalities and on its web page, at least two weeks prior to the start of any construction works
Relevant government authorities, ministries and public institutions	Issuing permits, consents and opinions in accordance with local legislation, control of compliance with local legislation	Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures Reporting based on national legislation requirements	<ul style="list-style-type: none"> As defined by national legislation
Interested non-governmental organisations (NGOs)	Stakeholders of high significance for the Project's success which are interested in protection of the environment and human health. All shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation. Note: Any organizations interested in the Project can send their contact details to the PIU to be included in the <i>Table of NGOs</i> and notified directly about Project events.	Providing timely information, communication and consultations	<ul style="list-style-type: none"> Public consultation meetings, and individual consultation meetings as necessary Direct email communication Media/ press releases

9 MANAGEMENT FUNCTIONS

The Ministry of transport and communications of the Republic of North Macedonia is the main responsible institution for implementation of the Local Roads Connectivity Project.

The Project Implementation Unit (PIU) is established for the purpose of LRCP implementation and is located in the premises of the Ministry of Transport and Communications, staffed with experts/specialist as the following: civil engineers, safeguard experts to provide assistance on environmental and social safeguards issues, fiduciary staff (procurement and financial experts) etc. The PIU is responsible for the overall LRCP implementation, project planning and coordination, procurement, monitoring of the project activities and reporting.

An independent Environmental and Social Specialist(s) (ESS(s)) has been engaged by the PIU for the entire period of the project implementation. The ESS is responsible for ensuring proper environmental management of all LRCP activities, will conduct environmental supervision by carrying out document reviews, site visits and interviews with Contractor, Construction Supervisors (if any), and municipality staff. ESS is responsible for reviewing all environmental safeguard documentation (site-specific ESMPs) submitted by sub-project proponents, providing recommendations, advising on the sub-project category advising on the quality of, and clearing the environmental safeguard documentation on behalf of the PIU.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of the PIU Environmental and Social Specialist. Main tasks for PIU Environmental and Social Specialist - responsible person for SEP implementation:

- ❖ Implementation of the Stakeholder Engagement Plan (SEP). ESS presents information regarding the project and receive any community concerns or complaints (grievance forms);
- ❖ Facilitate all stakeholder engagement events and disclosure of material to support stakeholder engagement events;
- ❖ Participate during all face-to-face stakeholder meetings;
- ❖ Preparation of Minutes of meeting from all engagement events; and
- ❖ Maintain the stakeholder database.
- ❖ Maintain the track results of regular meetings and specific concern/complaint received. The grievance data base need to be maintained on regular basis with all received concerns/how the concern/complaint was addressed and/or resolved, etc.
- ❖ Prepare periodic Reports on current status with implementation of SEP to the project Management Team;

Annex 1 Form for submitting comments

Form for submitting comments and suggestions for (Initial Limited Impact Assessment/ESMP Checklist)	
Main description of the project	
Electronic version and hard copy of (Name of the Document) are available on:	
<ul style="list-style-type: none"> ➤ Sub-project Proponent (web page) ➤ Sub-project Proponent Notice Board <ul style="list-style-type: none"> Contact Person: Address: Phone number: e-mail: ➤ Project Office WB (web page) <ul style="list-style-type: none"> Contact Person: Address: Phone number: e-mail: 	
<p>If you have any comments/suggestions or amendments to the proposed measures of (Name of the Document), please submit it to the responsible persons from the List in the 14 days period after the announcement of (Name of the Document) (date of announcement:)</p>	
<p>Please, submit your comments (grey fields) for improvement of (Name of the Document) submit it on the mentioned e-mail addresses of the responsible persons for the project implementation (PIU responsible person for communication with the stakeholders)</p>	
Referent number: _____ (fulfilled by the responsible persons for the project implementation)	
Name and surname of the person who provides comment*	
Contact information*	E-mail: _____ Phone: _____
Comment:	
Signature _____	Date _____

Annex 2 Grievance Form for construction phase of the project

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

Signature: _____

Date: _____

Please return this form to:

Attention: _____

E-mail: _____

Local Roads Connectivity Project
 Ministry of Transport and communications
 St. Dame Gruev 6,1000 Skopje, R. N. Macedonia