



European Bank for Reconstruction and
Development

A2 MOTORWAY: BUKOJCHANI - KICHEVO SECTION

STAKEHOLDER ENGAGEMENT PLAN





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SUPPLEMENTARY SEP

1 INTRODUCTION

- 1.1.1. The European Bank for Reconstruction and Development (EBRD or the Bank) is considering providing finance to Public Enterprise for State Roads (PESR) for the construction of the motorway section A2 Bukojchani - Kichevo. This document is a Stakeholder Engagement Plan (SEP) prepared for the Public Enterprise for State Roads (PESR) in the Republic of North Macedonia ('the Client'). It identifies relevant stakeholders, defines communication channels and plans regarding the construction of the 10.7km Bukojchani - Kichevo section of the A2 motorway ('the Project'), which is part of Corridor VIII. Corridor VIII is one of the main transport routes on the North Macedonia road network and provides a transport route of international importance.
- 1.1.2. An Environmental and Social Impact Assessment (ESIA) for the Project was disclosed on the 11th December 2020 and assessed the original alignment (Figure 2-1). However, a realignment was developed following consultation on the disclosed ESIA and national ESIA and is now the preferred option (Figure 2-2). An ESIA addendum for the project has been prepared to evaluate the potential implication the realignment, which applies to a 4km section of the Project between chainage km 2+000 and km 6+000.
- 1.1.3. This SEP was updated in July 2021 to account for the realignment, which has been developed in response to concerns raised by local residents during the stakeholder engagement activities, particularly in relation to the close proximity of the original Strogomishte Interchange to residential properties, and the potential effects of the Project on the cemetery in Dolno Strogomishte.
- 1.1.4. The SEP provides an overview of relevant national legislation, EBRD Environment and Social Policy (ESP) 2014, European Union (EU) directives and international best practice related to information disclosure and outlines the general approach to stakeholder engagement and public consultation. The SEP is a live document so it should be reviewed and updated periodically and in line with new activities, changes in Project design and newly identified stakeholders.
- 1.1.5. This updated SEP, will also be disclosed together with the following updated documents: **LAF**, Environmental and Social Action Plan (**ESAP**), Non-Technical Summary (**NTS**) of the ESIA, and the **ESIA Addendum** (including the updated Environmental and Social Management Plan **ESMP**). The Client disclosed the ESIA in accordance with national procedures, for a 30-day period within the 120-day EBRD disclosure period. All these documents were publicly disclosed via specified routes in Section 5 of this SEP.
- 1.1.6. Within the ESIA disclosure period, the PESR undertook various consultation activities, including public consultation held in January 2021.
- 1.1.7. In line with the national procedures, the MoEPP organised a public hearing in the Municipality of Kichevo on 23.07.2021 on which meeting, the realignment alternative at Dolno Strogomishte was fully supported by the Municipality of Kichevo and residents.
- 1.1.8. This SEP should be read alongside the Supplementary SEP (Appendix D) which includes provisions for an amended stakeholder engagement programme, taking into account restrictions due to Covid-19.
- 1.1.9. The PESR will undertake public disclosure of the following updated documents: LAF, SEP, ESAP and Non-Technical Summary (NTS) for the ESIA. These documents will be available in the following languages:
- Updated LAF – Macedonian, English and Albanian;
 - Updated NTS – Macedonian, English and Albanian;
 - Updated SEP – Macedonian, English and Albanian;
 - Updated ESAP – Macedonian, English and Albanian;
 - Updated ESMP – Macedonian and English; and
 - ESIA Addendum – Macedonian and English.

1.2 OBJECTIVES OF THE PLAN

- 1.2.1. The SEP summarises the methods, procedures, policies and activities that will be implemented by the Client, to inform stakeholders in an inclusive and timely manner about the potential impacts of the Project.

- 1.2.2. The public will be able to access and review this SEP at the PESR offices in Skopje and on the PESR and EBRD websites. Hard copies of the SEP will be available at the PESR offices, and within the identified local villages, details of which can be found in Section 5. The LAF, SEP, ESAP and NTS will be provided in Macedonian, English and Albanian (as the majority of the population in the nearby settlements is Albanian).
- 1.2.3. Stakeholder engagement and consultation aims to inform and improve Project decision-making and build understanding by actively involving interested individuals, groups and organizations, and helps to identify and involve all potentially affected groups and individuals, generate a good understanding of the Project amongst those that will be affected or have a vested interest, identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders, ensure that mitigation measures are appropriate (implementable, effective, and efficient) and establish a system for long-term communications between the Project developer and communities that is of benefit to all parties.

2 PROJECT DESCRIPTION

2.1 PROJECT CONTEXT

- 2.1.1. The Public Enterprise for State Roads (PESR) approached the European Bank for Reconstruction and Development (EBRD) requesting a loan to finance the construction of motorway section A2Gostivar – Kichevo, part of Corridor VIII, subsection Bukojchani to Kichevo. The Loan will be used to finance the construction of the 10.7 km long subsection Bukojchani – Kichevo, of A2 motorway section Gostivar – Kichevo ('the Project'). The alignment to the north of the Project is currently planned for design and construction in the future. The A2 alignment to the south of the Project has been designed and is currently being constructed (Section Kichevo – Ohrid).

2.2 CONSTRUCTION PLANNED

- 2.2.1. Corridor VIII runs through the territory of North Macedonia and is approximately 305km in length. The A2 motorway, which includes the subsection Bukojchani - Kichevo, is expected to improve the road connections in the country and with neighbouring countries. It is also expected to strengthen mobility and trade, and to increase the opportunities for social and economic benefits, both nationally, as well as for the neighbouring countries. The subsection is located within the municipality of Kichevo, and the largest settlement in the municipality is the city of Kichevo. Figure 2-1 shows the location of the original alignment for the Project. The realignment is shown in Figure 2-2 and this is now the preferred option.

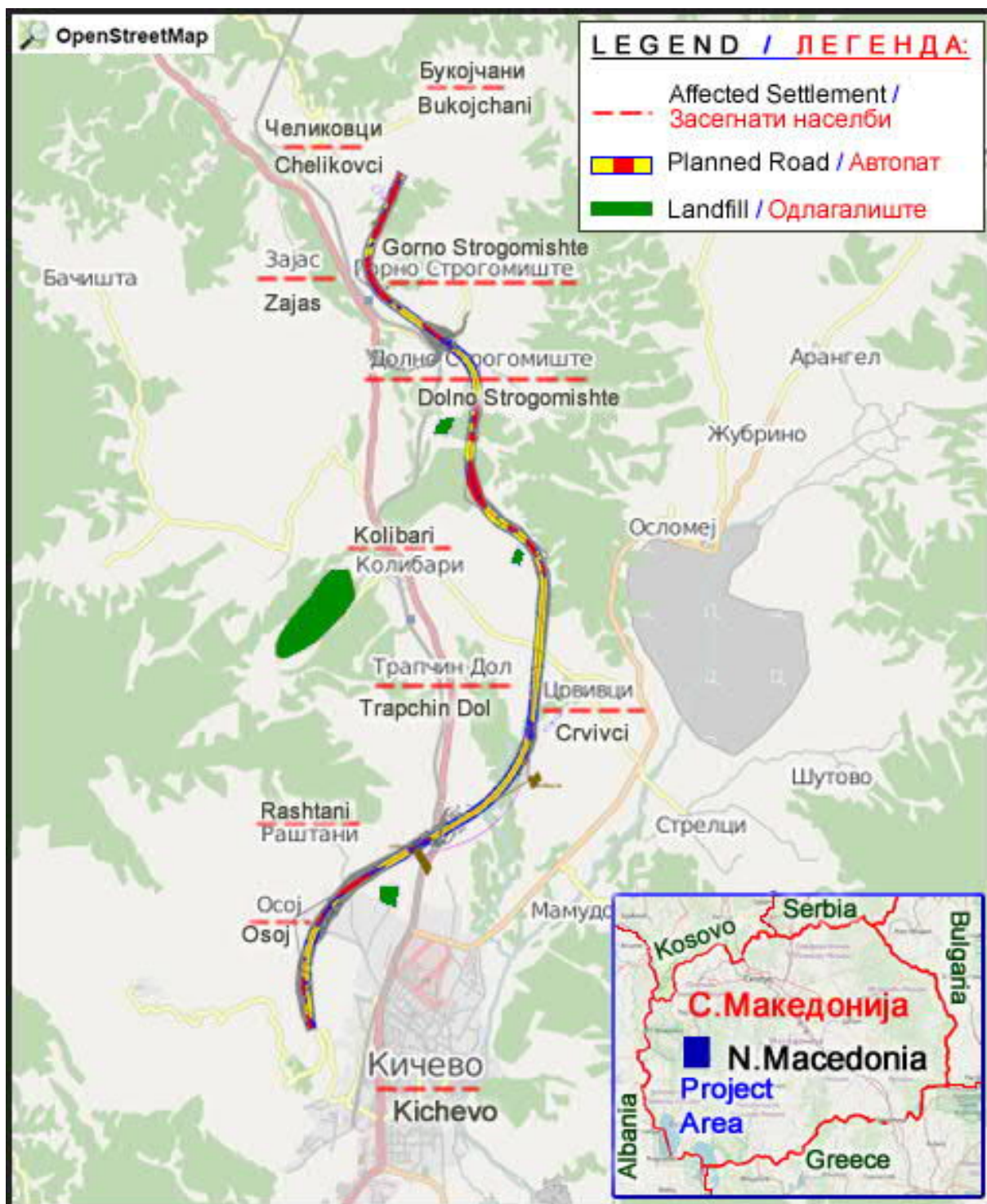


Figure 2-1 - Project Location

THIS DRAWING MAY BE USED ONLY FOR THE PURPOSE INTENDED AND ONLY WRITTEN DIMENSIONS SHALL BE USED

- Legend**
- Town
 - Link Road
 - Original Alignment
 - Realignment
 - Embankment
 - Existing Roads
 - Existing Railway
 - ▨ Area Extents of the Realignment



Note:
Original alignment and realignment have been digitised based on a .jpeg file.

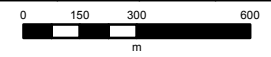
Drawing Status: **FINAL**

Job Title:
A2 MOTORWAY: BUKOJCHANI – KICHEVO SECTION

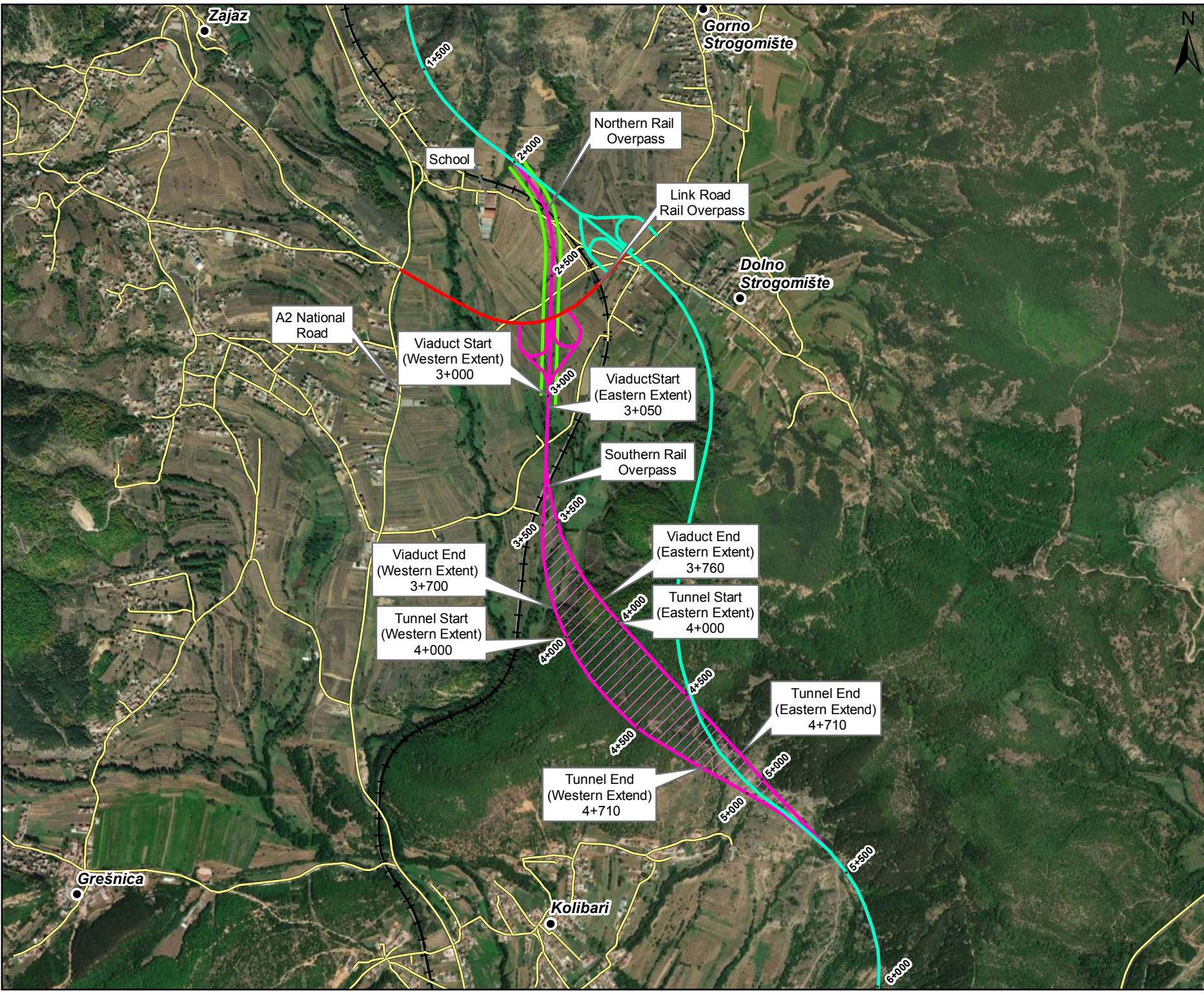
Drawing Title:
Figure 2 -2 - Realignment
(2+000 and 6+000)

Scale at A4: **1:20,000**

Drawn	DG		
Stage 1 check	Stage 2 check	Originated	Date
SB	JW	DG	14/07/2021



Drawing Number: Figure 2 2



Path: \\uk.wspgroup.com\central\data\Projects\7006\1xx\70061173 - Kichevo to Bukojchani ESIA\04 - WIP\19 - ESIA Addendum\GIS\Mxd\Figure 1-1 - Realignment (2+000 and 6+000).mxd

- 2.2.2. The existing terrain along the proposed route is characterised by mountains and flat terrain interspersed with permanent and temporary watercourses which flow into the Zajaska River. The mountainous part of the route consists of solid rock, while the plain terrain is mainly arable. The existing A2 national road to Ohrid is parallel to the adopted route, as well as the existing railway line from Gostivar to Kichevo, which intersects with the proposed route at various locations.
- 2.2.3. The A2 Motorway, section Bukojchani - Kichevo was defined in accordance with the Terms of Reference for a speed of 100 km/hour with the parameters outlined in Table 2-1.

Table 2-1 – Project Parameters

Element	Parameter
Lanes	2 x (2 x 3.50)
Border lanes	2 x 0.50+2 x 0.25 m
Profile of carriageway	10.25 m
Dividing lane	3.0 m
Shoulders	2 x 1.2 m
Gutter + berm	0.75+3.0 m
Min. transversal slope	2.5 %
Max. longitudinal slope	5 %
Additional lanes for slow vehicles	3.50 m

- 2.2.4. The Project will require the construction of several structures along the route including underpasses, overpasses, a tunnel, 3 bridges over the Zajaska (2 bridges) and Sushica Rivers, intersections, viaducts, an embankment, supporting walls, culverts and electrical work.
- 2.2.5. The underpasses and overpasses maintain access to local villages, shops and community facilities and emergency services. The Kolibari tunnel will have two tubes, that will be approximately 760m long, with a width of 7.6m. It will be constructed using drill and blasting. The two bridges over the River Zajaska will have pier protection, and have been designed to accommodate the 1 in 100-year flood.
- 2.2.6. The footprint of the Project affects the following settlements: Bukojchani, Gorno Strogomishte, Dolno Strogomishte, Oslomej, Osoj, Trapchin Dol, Rashtani, Crvivci, Kolibari, Zajas and the city of Kichevo. The Project may require land acquisition and resettlement, therefore a Land Acquisition Framework (LAF) has been produced which outlines the objectives, principles and planned approach to land acquisition, compensation and livelihood restoration. The LAF and other Project documentation will be disclosed at the following locations as detailed below:

1. Public Enterprise for State Roads

Address: Dame Gruev 14, 1000 Skopje, Republic of North Macedonia
 E-mail address: contact@roads.org.mk
 Tel.: +389 2 3118 044
 Fax: +389 2 3220 535
 e-mail: gragjani@roads.org.mk

2. Municipality of Kichevo

Address: Boris Kidrich 1
 Kicevo, 6250 Republic of North Macedonia

Phone: (045) 223-001
Email: kercova2013@yahoo.com
Hours: Monday – Friday 8:00 a.m. – 4:00 p.m

3. **Village of Dolno Strogomishte**
Address: v. Dolno Strogomishte, Zajas
(location: village community Building)
Kicevo, 6250 Republic of North Macedonia

4. **EBRD WEBSITE**
www.EBRD.com

2.2.7. Further information relating to information disclosure is provided in Section 6

3 CONSULTATION AND DISCLOSURE REGULATORY FRAMEWORK

3.1 NATIONAL REGULATORY REQUIREMENTS

ENVIRONMENTAL IMPACT ASSESSMENT APPROVAL PROCESS

- 3.1.1. This Project is subject to a National EIA under the local legal requirements, which will require approval from the Ministry of Environment and Physical Planning of the Republic of Macedonia, prior to the commencement of construction. The Law on Environment (OG of RM, no. 53/05, 81/05, 24/07, 159/08, 83/09, 48/10, 124/10, 51/11, 123/12, 93/13, 187/13, 42/14, 44/15, 129/15, 192/15, 39/16) and associated amendments set out the requirements for undertaking an environmental impact assessment of projects and covers the preparation and contents of Environmental and Social Impact Assessments.
- 3.1.2. Public disclosure and consultation activities have been undertaken to inform the preparation of Project documentation and related strategic and other studies, in accordance with the Law on Urban and Spatial Planning (OG of RM, no. 199/14, 42/14, 44/15, 193/15, 31/16). This Law regulates the urban development and spatial planning system, requires public information and participation throughout the development and adoption of urban and spatial planning documents.
- 3.1.3. In addition, the Law on Environment also set out the requirement to involve stakeholders and the public (including access to and disclosure of information, presenting opinions, comments on environmental impact assessment and organization of public hearings). It highlights that effective public engagement is achieved by disclosing information about the Project, and the ESIA process, to the public, and ensuring the public is actively involved in discussions. They should be able to submit their written opinion throughout the different ESIA phases, and should have access to justice, where the public can influence decision making by submitting appeals to the Court or Second Instance Commission of the Government.
- 3.1.4. This road Project will be subject to ESIA under the local legal requirements and a positive conclusion from the Ministry of Environment and Physical Planning will need to be obtained prior to commencement of construction and operation.

LAND ACQUISITION / EXPROPRIATION

- 3.1.5. National legislation deals with involuntary resettlement and livelihood restoration through its legal framework for expropriation, where owners of properties are compensated for their losses. The legislative acts below regulate the acquisition of State ownership rights to privately owned land:
- The Expropriation Law (OG of RM No. 95/12, 131/12, 24/13, 27/14, 104/15, 192/15, 23/16, 178/16) regulates the procedure for the expropriation of property in relation to projects that are of public interest, and the connected rights for real estates (immovable properties).
 - The Law on ownership and other real rights (OG of RM No. 18/01, 92/08, 139/09, 35/10) regulates the rights and obligations of owners of properties affected. The right to ownership can be acquired by all domestic and foreign national persons and legal entities, including the state, and local self-government units, in accordance with conditions and in a manner stipulated by this and other laws.
 - The Law on Housing (OG of RM no. 99/09, 57/10, 36/11, 54/11, 13/12, 55/13, 163/13, 42/14, 199/14, 146/15, 31/16). The key point that is of relevance to this Project from a social perspective, is that it includes provisions to enables socially vulnerable and homeless people to rent state owned apartments, in accordance with the Law on Social Protection.
 - The Law on Social Protections covers the issue of social housing and the housing of vulnerable groups (including children without parents or without parental care, users of social and permanent financial assistance, persons affected by natural disasters, persons with a disability and persons who need assistance and care and vulnerable groups such as persons belonging to the Roma community, and single parents with young children).

3.1.6. Other bylaws defining the relationship among affected parties in the process of land acquisition are:

- The Law on Construction (Official Gazette of Republic of Macedonia No. 130/09, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16, 31/16, 39/16, 71/16, 132/16).
- The Law on Assessment (Official Gazette of the Republic of Macedonia No. 115/10, 158/11, 185/11, 64/12, 188/14, 104/15, 153/15, 192/15, 30/16)
- The Law on Access to Public Information (OG of RM no. 13/06, 86/08, 06/10, 42/14, 148/15, 55/16)
- Methodology for assessment of the market value of the real estate (Official Gazette of the Republic of Macedonia No. 54/12)
- Rulebook on the method of cadastral classification and determination and registration of the change of cadastral culture and land class (Official Gazette of Republic of Macedonia No. 144/13, 95/15)
- The Law on acting upon illegally constructed buildings (Official Gazette of the Republic of Macedonia No. 23/11, 54/11, 155/12, 53/13, 72/13, 44/14, 115/14, 199/14, 124/15, 129/15, 217/15, 31/16)
- The Law on acting upon complaints and proposals (Official Gazette of Republic of Macedonia No.82/2008, 13/13, 156/15, 193/15);
- The Law on Real Estate Cadastre (Official Gazette of the Republic of Macedonia No. 55/13, 41/14, 115/14, 116/15, 153/15, 192/15, 61/16).

3.1.7. Where differences exist between local law and EBRD policies and practices, the land acquisition and resettlement for this Project will be resolved in favour of the latter. Full details of the regulatory framework related to land acquisition and resettlement can be found in the LAF.

GRIEVANCE MECHANISM

3.1.8. National law establishes the rights of affected citizens (those with formal land rights) to appeal to Courts during the expropriation process as covered above, however it does not require the development of specific grievance mechanisms. In some instances, issues related to provision of compensation for land and assets can also be addressed through the implementation of the Law on Obligations. In principle, this law requires provision of compensation in cash to formal legal owners of land and assets (or those whose rights are recognisable under national laws) for damages or losses incurred as a result of a developer or its contractors accessing land or preventing access to land and/or assets. In such cases, compensation is provided after the damages and/or losses have already occurred. Cases, where the party who caused damage/losses and the affected person do not agree on the amount of compensation, are typically referred to the Courts.

3.2 EBRD REQUIREMENTS

3.2.1. The Project needs to adhere to EBRD Environmental and Social Policy 2014¹ and the ten EBRD Performance Requirements (PRs). The Project has been assessed against PRs 1, 2, 3, 4, 5, 6, 7, 8 and 10. The EBRD PR 9 (Financial Intermediaries) is not applicable, as there are no financial intermediaries involved. The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key pertinent requirements of this PR are:

- Identify the various individuals or groups who are affected or likely to be affected by the Project; or may have an interest in the Project.

¹ EBRD (2014) Environmental and Social Policy [Online] Available at: <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

- Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.
- Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.
- Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.

3.3 BEST INTERNATIONAL PRACTICE

3.3.1. The key principles of inclusive and effective engagement for a Project are summarised as follows:

- Providing meaningful information in a format and language² that is readily understandable and tailored to the needs of the target stakeholder group(s).
- Providing information in advance of consultation activities and decision-making.
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate.
- Respect for local traditions, language, timeframes and decision-making processes.
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed.
- Inclusiveness in representation of views, including people from different age groups, gender, vulnerability and/or minority groups.
- Processes free of intimidation or coercion or incentivisation.
- Clear mechanisms for responding to people's concerns, suggestions and grievances.
- Incorporating, where appropriate and feasible, feedback into Project or programs design and reporting back to stakeholders.

3.3.2. These principles will be reviewed and accordingly adopted by the Client dependent on the gaps between national legislation, EBRD requirements and best international practices.

3.4 GENERAL STAKEHOLDER COMMUNICATION RECORDS MAINTENANCE

3.4.1. Consultation records, minutes of meetings and write-ups of informal consultations will be maintained by the local authorities and PESR's Community Liaison Officer (CLO) clearly logging the key information provided to stakeholders and the key incoming communications, complaints and questions along with a summary of actions taken. As part of this communication procedure, PESR's CLO will record and update these stakeholder engagement activities on an on-going basis and will prepare annual reports summarising the activities and key emerging themes raised by affected people.

² The Albanian language is now co-official language at a state level and in local self-government units where speakers of the population are 20% or more. These include places such as Kichevo, and other municipalities located within the project area or in its close proximity. The change in status occurred in 2019 as usage of the Albanian language became no longer geographically limited. The new law extended the official use of Albanian over the entire country, easing communication in Albanian with the institutions. Under the new legislation, Macedonian continues to be the primary official language, while Albanian may be used now as a second one, including at a national level in official matters. The legislation stipulates also all public institutions in the country will provide Albanian translations in their everyday work.

4 IDENTIFICATION OF MAIN STAKEHOLDERS

- 4.1.1. The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of environmental and social impacts, stakeholders are identified by the impact area.
- 4.1.2. As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:
- a) Primary stakeholders are the individuals and groups who are affected directly by the Project; and
 - b) Secondary stakeholders are those parties which have influence on, but are not necessarily directly impacted by, the Project.
- 4.1.3. The following provides a list of potential environmental and social risks that are associated with (but not limited to) the Project:
- Loss of access to some individual land plots and/or their bisection (i.e. potential economic displacement);
 - Potential physical displacement – however the designers are now considering measures to avoid and/or minimise these impacts and local communities will be consulted about the suggested solutions;
 - Deterioration of air quality due to emissions of construction-borne air pollutants and traffic-borne air pollutants;
 - Emissions of greenhouse gases;
 - Alteration of groundwater, surface water hydrogeology and morphology;
 - Pollution of soil, groundwater and surface water during the construction period due to spillages of lubricating material, fuel, bitumen etc. and from road vehicles, filling of vehicles with fuel and oils etc;
 - Alteration to watercourse and floodplain habitat ecology and alteration of surface water flow patterns and sediment deposition during flooding periods;
 - Soil erosion and degradation due to clearance of vegetation and earth movements;
 - Waste generation during construction and operation;
 - Noise emissions from construction vehicles and activities and from operational traffic;
 - Loss of habitats and habitat fragmentation;
 - Alteration of landscape scenery due to construction works and highway structures;
 - Dust pollution during construction works, local discomfort and nuisance;
 - The risks of collisions and accidents involving persons and domestic animals;
 - Local disturbance associated with construction workers; and
 - Planning for the demolition of buildings and removal or repositioning of utilities.
- 4.1.4. Therefore, this SEP has been developed to address community concerns with regards to key environmental and social risks through implementation of the stakeholder consultation and information disclosure activities.
- 4.1.5. The nature of the impacts would be mainly associated with construction works and potentially affect residential areas / households near construction of road, local businesses including commercial and agricultural entities and local residents and migrant workers who will be hired for construction (contractors will be required to implement policies into the recruitment procedures to account for hiring of local workers) and the general public.
- 4.1.6. Key stakeholders identified are presented in Table 4-1.

Table 4-1 – Key Identified Stakeholders and Methods of Engagement

Type	Name / Organisations	Stakeholder Category	Impact / Influence	Preferred Method of Engagement
Local Residents and Businesses	Residents including owners, renters, leaseholders, users of cemeteries and schools, informal users of lands and buildings affected by the Project and businesses located along the suggested route, including the following settlements: Gorno Strogomishte, Dolno Strogomishte, Bukojchani, Zajas, Kolibari, Trapchin Dol, Crvici, Pevci, Rashtani; Osoj and Kichevo.	Primary	Direct and indirect Impacts could include economic and physical displacement, disturbance, visual and HSE impacts on local residents and businesses during construction and operation phases.	PESR will organise and carry out public consultation meetings in the local settlements, as well as focus group meetings to identify impacts, agree and implement mitigation measures.
Ministries	Ministry of Transport and Communication	Primary	This group will have a direct influence / impact on the Project through reviewing and approval of Project documentation and implementation of the Project.	Official correspondence and meetings as need throughout Project implementation alongside submission of documentation.
	Ministry of Environment and Physical Planning	Primary	The direct influence/impact on the Project through approving permits, providing certificates and enforcing new regulations and rules.	Official correspondence and meetings as need throughout Project implementation alongside submission of documentation.
	Ministry of Agriculture, Forestry and Water Economy	Primary	Direct influence over land transformation from agricultural into construction land	Official correspondence and meetings as need throughout Project implementation alongside submission of documentation.
	Other ministries, as relevant including the Ministry of Finance, Ministry of Economy and Ministry of Labour and Social Policy;	Primary	This group will be involved in the project-related decision-making process	Official correspondence and meetings as needed throughout Project implementation alongside submission of documentation.
Municipality of Kichevo	Mayor, Municipal departments, Local Public Enterprise and Village Councils	Primary	This group will be involved in the project-related decision-making process and will need to be informed of Project activities within its boundaries.	Official correspondence and meetings as needed throughout Project implementation and submission of documentation

Type	Name / Organisations	Stakeholder Category	Impact / Influence	Preferred Method of Engagement
Local and National Stakeholders	Roma Democratic Development Association (RDDA) SONCE for the Roma families living in Pevci	Primary	These five groups will directly influence and impact the Project through their involvement in consultations and decision-making.	Official correspondence and meetings as needed throughout Project implementation alongside and media/press releases.
	Organisation for Youth Development, Kichevo			
	Albanian Women Organisation, Kichevo			
	ROMACTED ³ , Kichevo office representatives ⁴			
	Roma Social Housing Programme ⁵ - 2021-2022 Pilot Project in Kichevo aiming to improve the living conditions of the Kichevo Roma community.			
Public Enterprises	Macedonian Railways - Infrastructure	Primary	This group will be involved in the project during construction and operation activities.	Official correspondence and meetings as need throughout Project implementation
Local emergency services, fire brigades, utility owners and operators, local police	This group should be kept informed of Project developments to ensure continued support for the Project.	Secondary	This group will be affected directly as a result of the construction and operation activities.	Official correspondence and meetings to prepare for and coordinate activities during construction prior to construction activities and in the operational phase.
Vulnerable Groups	Based on the EBRD definition of vulnerable people, this category includes people who, by virtue of	Primary	The vulnerable groups could be indirectly affected as a result of the	PESR will organise focus group meetings with vulnerable groups

³ The ROMACTED Programme -“Promoting Good Governance and Roma Empowerment at Local level” is a joint initiative of the Council of Europe, The Republic of North Macedonia and the European Union. The programme aims to further develop sustainable engagement policy with local authorities to enhance democratic local governance and local authorities’ and local Roma communities engagement for better Roma inclusion.

⁴https://www.canva.com/design/DAD1VJ4rMZE/BNs80xqmRhldORaXkPamKw/view?utm_content=DAD1VJ4rMZE&utm_campaign=designshare&utm_medium=link&utm_source=homepage_design_menu#3.

⁵ <https://www.cgimk.org.mk/index.php/en/23-news/329-roma-social-housing-program-in-kichevo>.

Type	Name / Organisations	Stakeholder Category	Impact / Influence	Preferred Method of Engagement
	gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.		construction activities: reduced access rights, reduced safety, dust and noise emissions. Further impacts on this group will be confirmed during a future household survey to be carried out by PESR.	within local settlements to identify impacts, agree and implement mitigation measures.
Construction Workers including Migrant Workers	Local people from nearby villages, workers and any migrant workers.	Primary	There will be potential job opportunities for local people from nearby villages and towns. Local women may feel threatened by migration of workers into the area as a result of the potential influx of workers.	PESR to facilitate a regular meeting with impacted workers to address any concerns and issues. The Contractor is to prepare a site-specific Contractor's Environmental and Social Management Plan (CESMP) which will describe measures for the Contractor's/Subcontractor's workers while interacting with communities.
PESR	Environmental / Social Department and Project Manager	Primary	Individual meetings or internal workers meetings, monthly newsletters	Official correspondence, meetings, site visits, code of conduct, information in contract on standards and expectations with respect to environmental and social protection, health and safety at work, security, access to sites and interaction with communities.
Project Lenders	EBRD	Primary	This group will directly influence and impact the Project through the decision-making process.	Official correspondence and meetings as needed throughout Project implementation
Contractors / Suppliers	Third party companies who provide and supply products and services to PESR, including the road construction contractor. Third party companies such as those that will provide maintenance, cleaning and amenity services together with infrastructure companies are currently unknown; these will be confirmed prior to construction and the SEP updated accordingly.	Primary	The contractors and suppliers will be involved in the Project through following corporate rules and compliance with environmental and social legislation and lender requirements.	Official correspondence, meetings, site visits, code of conduct, information in contract on standards and expectations with respect to environmental and social protection, health and safety at work, security, access to sites and interaction with communities.

4.2 STAKEHOLDERS IDENTIFIED DURING THE DEVELOPMENT OF THIS PLAN

- 4.2.1. The Project stakeholders at this stage are presented in Table 4-1, with suggestions on the means of engagement that they are likely to be most effective. Stakeholders that were not identified during this process will be notified of a CLO details and Grievance Mechanism contact details to enable them to contact the PESR or local authorities to request their addition to the list.

4.3 VULNERABLE GROUPS

- 4.3.1. Based on the EBRD definition of vulnerable people, this category includes people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.
- 4.3.2. Particular attention needs to be paid to vulnerable groups, especially those below the poverty line, the landless, the elderly, women-headed households and children, and those without legal titles to land, and ensure their participation in consultation events. Women in the predominantly Albanian settlements might require separate focus group discussions to solicit their views and opinions on the project and its impacts.
- 4.3.3. Vulnerability will be assessed and confirmed based on the results of a census and asset inventory survey in the project area and also a socio-economic survey that will be carried out by PESR during consultations with land owners, and defined more precisely as part of the land acquisition process and outlined in the Land Acquisition Plan, following the completion of the detailed design expected to be finalised in 2021.

4.4 GENDER CONSIDERATIONS

- 4.4.1. Gender considerations have been incorporated into the SEP and the future engagement methods. Engagement activities are designed to allow women to participate, i.e. focus groups and workshops. There are multiple methods for women to get involved in consultations and provide feedback on different aspects of the Project. Women will be consulted on the Project activities, further details on consultation methods are provided in Section 6.
- 4.4.2. Women will also be consulted on road safety and providing them with fair and equal representation in decision-making situations and providing them with greater awareness of road safety from a gender and children's perspective.

5 EXISTING AND PREVIOUS STAKEHOLDER CONSULTATIONS

5.1 OVERVIEW OF EXISTING STAKEHOLDER AND COMMUNITY RELATIONS

- 5.1.1. Stakeholder engagement and public hearings are a requirement under Republic of North Macedonia legislation. The stakeholder engagement process started early during the planning phase of this Project with Local Consultant GEING, who were undertaking the ESIA preparations, and PESR undertaking preliminary consultation activities as part of the preparation of the national ESIA. As the design developed for the Project consultations took place with local authorities to ensure the design considered the concerns of the local communities.
- 5.1.2. During the site visits in September 2018 an initial inspection on the potentially affected assets and communities was conducted. Later, during the second (07.03.2019) and third (28.03.2019) site visits, individual non-formal interviews were held on site with residents of the two potentially affected settlements Osoj (Pevci) and Rashtani.
- 5.1.3. In June 2019, a consultation event was held in the Municipality of Kichevo's Council Hall with representatives from the Municipality of Kichevo and representatives of affected the communities. The purpose of this consultation was to: present the Project and status of the design; introduce the EBRD requirements and the activities and timeframe for the preparation of ESIA documents; and facilitate communication between the design team, ESIA team, PESR, the Municipality of Kichevo and the representatives of affected local communities.

- 5.1.4. In early July 2019, a consultation meeting was organised by PESR with representatives of the village of Dolno Strogomishte where they were invited to express their opinions and any concerns about the Project. During the meeting, representatives were generally positive about the Project, however some concerns were raised on the impacts to the local cemetery and houses. Representatives indicated they would like to see alternative design options that would reduce the potential impact of the Project on the cemetery and houses.
- 5.1.5. During the meeting representatives from Dolno Strogomishte raised concerns over the proposed design of the viaduct that crosses over the cemetery within the village. Other representatives asked about the price of land that is supposed to be expropriated, however they were advised that it is not possible to provide exact figures at this stage in the Project. In addition, a representative from Crvivci asked whether there was the possibility to design an additional intersection close to the village.
- 5.1.6. No definitive conclusions were reached, however actions from the consultation meeting were for PESR to investigate the proposed realignment to avoid and/or reduce direct physical impacts on local communities' properties and the cemetery in the village of Dolno Strogomishte. It was agreed that this would be discussed further, in consultation with the Designers, Project Lenders and local social experts.

DISCLOSURE CONSULTATIONS

- 5.1.7. The PESR undertook various consultation activities during the disclosure of the ESIA in January 2021, as summarised in Table 5-1.

Table 5-1 – Summary of Disclosure Consultations

Date	Location	Attendees	Number of Attendees*
13 th January 2021	Kichevo <i>Note: consultation undertaken inside with hand sanitiser provided and all attendees wore face coverings, to align with COVID-19 restrictions.</i>	<ul style="list-style-type: none"> ■ Mayor of the Municipality of Kichevo ■ Municipality of Kichevo Urban Planning Department ■ Public Enterprise for State Roads ■ Project Design Team 	10
	Dolno Strogomishte <i>Note: consultation undertaken outside due to COVID-19 restrictions.</i>	<ul style="list-style-type: none"> ■ Local residents from the villages Dolno Strogomishte and Gorno Strogomishte. ■ Interested members of the surrounding communities ■ Representatives of a local community group (opposing the Project) ■ PESR ■ Project Design Team 	40

*Note: Numbers exclude representatives from the PESR and the Project Design Team.

- 5.1.8. During each of the consultations an overview of the Project, as set out in the ESIA, was provided.
- 5.1.9. The key issues and concerns raised during the consultations regarded:
- The representatives of the local community group, formed to oppose the Project, presented a signed petition (with approximately 2000 signatories) to realign the Project to avoid the village of Dolno Strogomishte, prevent the community severance the Project would cause in the village, and avoid the Dolno Strogomishte Cemetery, and the potential need for exhumations. The PESR and the Project Design Team explained that a realignment that would avoid the village of Dolno Strogomishte was being considered, and although it would require two additional railway crossing, which would increase the construction costs substantially, it was being investigated technical, economically, socially and environmentally;

- The representatives of the Muslim Municipal Community of Kichevo (Kichevo Muftivstvo) sent the PESR a letter requesting the realignment of the Project to avoid Dolno Strogomishte Cemetery.
- The Kichevo Municipality noted that in some locations (in close proximity to village of Dolno Strogomishte) the Project was located on land had historically been allocated for housing; and
- The Kichevo Municipality noted that at the northern end of the Project, near Osoj, where a corridor of land had been allocated for this Project, there may have been some potentially illegal developments constructed.

5.1.10. Those in attendance at the consultations believed that the overall Project would provide better transport access, which would be beneficial to the local communities.

5.1.11. Photos of the disclosure consultations are included below in **Figure 5-1**.

Figure 5-1 - Photos of Disclosure Consultations



NATIONAL ESIA CONSULTATION

5.1.12. Following the receipt of the feedback from the stakeholder consultation and objection letter from the Municipality of Kichevo in May 2021 the realignment was developed. The objection letter from the Municipality of Kichevo related to the close proximity of the original Strogomishte Interchange to residential properties, and the potential effects of the Project on the cemetery in Dolno Strogomishte. The national ESIA was then revised to reflect the realignment.

5.1.13. The national version of the revised ESIA was sent to the Ministry of the Environment and Physical Planning on the 15th June 2021 and a public hearing on the Project was held on the 23rd July 2021 in the Municipality of Kichevo City Hall. The public hearing, as summarised in Table 5-2, was organised by the Ministry of the Environment and Physical Planning in compliance with the Law on Environment and announced in two national newspapers, on local TV and two radio stations in Macedonian and Albanian language.

Table 5-2 – Summary of Macedonian EIA Consultation

Date	Location	Attendees	Number of Attendees*
23 rd July 2021	Municipality of Kichevo City Hall Note: The Public hearing was organised by the Ministry of the Environment and Physical Planning	<ul style="list-style-type: none"> ▪ Local residents from the villages Dolno Strogomishte and Gorno Strogomishte ▪ Local residents from the Osoj settlement in Kichevo 	30

Date	Location	Attendees	Number of Attendees*
	in compliance with the Law on Environment.	<ul style="list-style-type: none"> ■ Interested members of the surrounding communities ■ PESR ■ Ministry of the Environment and Physical Planning ■ Project Design ■ Project national ESIA Team 	

- 5.1.14. At the public hearing local residents and interested members of the surrounding communities expressed their support for the realignment of the Project near Dolno Strogomishte.
- 5.1.15. Local residents from the Osoj settlement in Kichevo requested a further realignment at this location. PESR / the Project Design team advised that a realignment would not be practicable at this location, as the Project needs to connect to the A2 Kichevo – Ohrid motorway, which is currently under construction. Reassurance was provided based upon the mitigation measures included in the original ESIA, the ESIA Addendum, this SEP and LAF.
- 5.1.16. The official minutes of the hearing were uploaded onto the Ministry of the Environment and Physical Planning’s website (www.moep.gov.mk).
- 5.1.17. The ESIA Addendum will be published on the EBRD and PESR websites. Community engagement will continue throughout the land acquisition process, the design and construction phase.

6 STAKEHOLDER ENGAGEMENT PROGRAMME

6.1 DISCLOSURE OF INFORMATION

- 6.1.1. The types of information to be disclosed and the specific methods of communication to be undertaken by the local authorities for this Project are summarised in the Stakeholder Engagement Programme in Table 6-1. The objectives of external communications are to provide continuous engagement with affected people and other relevant stakeholders and to inform them about the activities, performance, development and implementation of the Project. The information to be disclosed publicly are governed by EBRD’s Public Information Policy and PR 10, and Republic of North Macedonia national legislation.

6.2 STAKEHOLDER CONSULTATIONS AND INFORMATION DISCLOSURE

- 6.2.1. The stakeholder consultation and information disclosure will cover the following main tasks:
 - Timely disclosure of project information to key stakeholders. Project information will be available through local authorities and disseminated via the heads of villages and in local community centres and Kichevo and will be made available on the PESR and EBRD websites (as detailed in Section 2.2.6). All key contacts will be provided by PESR during the organisation of such meetings and after confirming these details with Heads of Local administrations in the settlements to ensure that culturally- and gender-appropriate locations are used, as advised by the representatives of local communities.
 - PESR to publish at the locations outlined in Section 2.2.6 and with the local administration in settlements, the programme for consultation events. The programme will be kept up to date and transparent to ensure local community are aware of activities.
 - Informed participation and meaningful two-way consultation with the affected stakeholders; and
 - Development and implementation of a grievance mechanism to ensure that the affected stakeholders concerns and issues are addressed.

INFORMATION DISCLOSURE ACTIVITIES

- 6.2.2. The Client will disclose relevant information about the investment work at the early stage of the Project during detailed design and then as appropriate throughout the Project. The Project was disclosed on the 11th December 2020. This disclosure period related to the original alignment. However, a realignment was developed following consultation on the disclosed ESIA and is now the preferred option. An ESIA Addendum for the Project has been prepared to evaluate the potential implication the realignment, which applies to a 4km section of the Project between chainage 2+000 and 6+000.
- 6.2.3. The documents that were prepared following the realignment of the Project, will also be disclosed. These documents include the following updated documents: this LAF, SEP, Environmental and Social Action Plan (ESAP), the Non-Technical Summary (NTS) of the ESIA, and the ESIA Addendum. These documents will be available in the following languages:
- Updated LAF – Macedonian, English and Albanian;
 - Updated NTS – Macedonian, English and Albanian;
 - Updated SEP – Macedonian, English and Albanian;
 - Updated ESAP – Macedonian, English and Albanian;
 - Updated ESMP – Macedonian and English; and
 - ESIA Addendum - Macedonian and English.
- 6.2.4. The information above will be accessible to the public, including the affected communities during the duration of the Project. The hard copies of the related documents will be made available at the start of the disclosure period at the PESR Head Office – (Dame Gruev 14, 1000 Skopje, Republic of North Macedonia) and within the identified local villages. In addition, electronic copies will be available on the PESR and EBRD websites:
- PESR - <http://www.roads.org.mk/en>
 - EBRD - <https://www.ebrd.com/home>
- 6.2.5. The Project information, including potential job opportunities, will be advertised on bulletin boards in community centres and in the local media including popular newspapers that will be used for advertising the Project and potential job opportunities (such as Koha – a national newspaper in Albanian and Nova Makedonija – a national newspaper in Macedonian). The Project NTS with key project information and contact details will also be published to update the public about the Project progress and stages.

6.3 CONSULTATION METHODS

- 6.3.1. The main communication methods and mechanisms that will be used to consult with key stakeholders are largely described in Table 6-1, with additional recommendations provided below.

CONSULTATION WITH AFFECTED INDIVIDUALS AND VULNERABLE GROUPS

- 6.3.2. A number of consultations will be carried out by PESR prior to the construction phase of the Project, with the families who have the potential to be physically displaced, local residents whose houses and land plots will be located close to the Project, and local businesses.
- 6.3.3. The details of those further consultation meetings are not yet finalised, these details will be subsequently added to this SEP once known.
- 6.3.4. The details of other potentially affected groups and individuals will be confirmed after a household and asset inventory survey which will be conducted by PESR. Based on this new information, further consultation meetings could be required and these details will be subsequently added to this SEP.

FOCUS GROUPS

- 6.3.5. Specific focus groups will be conducted with the identified vulnerable groups, including persons with disability who may have difficulty attending consultation meetings, women, youth (for potential job opportunities), and people in receipt of social benefits. Further groups will be confirmed by PESR's CLO after a household survey

and could further include focus discussions on road safety, school and children's safety, cultural heritage and traffic management. A simple non-technical language will be used to ensure that the Project impacts are communicated transparently to this group.

ENGAGEMENT WITH LOCAL ROMA COMMUNITY

- 6.3.6. Separate and ongoing engagement process should be established with the local Roma community (near Pevci). It is expected that about 3 buildings within the Roma settlement will need to be resettled and demolished, as well as a few ancillary/non-residential structures (such as stables, sheds, etc). This will be confirmed by PESR during the preparation of Land Acquisition Plan (LAP). It is recommended that all planning related to the involuntary resettlement process should involve the local ROMACTED team and also the Kichevo Roma Social Housing Programme.
- 6.3.7. The Roma community discussions can be held either in a local school or in the local (Kichevo) offices of either the ROMACTED programme, or the Kichevo Roma Social Housing Programme or the RDDA facilities (see Table 4-1 for the details), where these organisations can assist with the meetings organisation and the consultation process itself.
- 6.3.8. The local Roma community meetings should be chaired by Roma-community representatives (i.e. people who have authority in the community), and attended by the PESR team and the design team – to explain the initial design and its later re-iterations, as well as potential impacts on the local Roma community. The Roma community-attendees of these meetings should be suggested by the Chair, with the additional attendees being suggested by either ROMACTED and/or RDDA.
- 6.3.9. The use of ROMACTED and/or RDDA as facilitators during the meetings is recommended to respect cultural norms and the language requirements (Macedonian or Roma). Such facilitators should include both men and women facilitators who can speak both languages. PESR will need to establish and confirm which language the Roma community prefer to use prior to the meetings. A variety of materials can be used during these focus groups meetings, including flyers, maps, flipchart presentations, posters, and NTS / updated NTS.
- 6.3.10. Additionally, affected individuals (those Roma families who can be subject to land acquisition and involuntary resettlement) should be consulted directly via their representatives or either ROMACTED The Kichevo Roma Social Housing Programme or RDDA representatives, to discuss the land acquisition process in detail, collect the relevant socio-economic information to design suitable livelihood restoration and compensation measures and, importantly, to present an opportunity to be consulted on the land acquisition process.
- 6.3.11. Minutes of all meetings should be kept and once ready, send to the community leaders to include their feedback and allow them to comment or add key points. The PESR Grievance Mechanism and its contact details should be explained and communicated during the first meeting.

6.4 THE FUTURE PROGRAMME – CONSTRUCTION PHASE

- 6.4.1. The envisaged programme of public consultation and disclosure activities are presented below. This programme includes immediate consultation and engagement activities required to address current stakeholder concerns, as well as regular consultation and disclosure activities throughout the Project life cycle.
- 6.4.2. Contact details and responsibilities for SEP implementation are as follows:
Name: Jozhe Jovanovski
Title: Manager of Environment Protection and Social Aspects, Project Implementation Unit, PESR
Telephone: +38923118044 ext. 305
Address: Dame Gruev 14, 1000 Skopje, Republic of North Macedonia
Email: j.jovanovski@roads.org.mk
Website: www.roads.org.mk
- 6.4.3. In addition, the construction Contractor will be required under the contract to elaborate the ESMP to prepare a Construction Environmental and Social Management Plan (CESMP), to include but not limited to the provision of a grievance mechanism, notice boards for Project information disclosure, traffic management plans, emergency response situation, local communities notification procedure, chance find procedure, further consultation and advance notice mechanisms related to Project construction activities documented within a Contractor SEP programme.

- 6.4.4. The PESR's CLO will collate any comments, provide feedback and document these. All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within the Section 3.3. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.
- 6.4.5. The Stakeholder Engagement Programme is detailed Table 6-1 below.

Table 6-1 – Stakeholder Engagement Programme

Activity	Stakeholders	Information Materials/ Communication Methods	Information to be Disclosed	Timeframe / Frequency	Responsibility	Location
Allocate a Project CLO	Local residents and businesses	Information boards with post box, personal visits and community meetings	LAF, NTS, grievance mechanism, ESIA, SEP, ESAP, timeline of construction and location of Project structures (underpasses, tunnels etc.).	Immediate	PESR	Project area / along the road alignment
Place hard copies of SEP and Project brochures/leaflets at PESR head office and distribute Project leaflets in the affected local communities	Local communities in Gorno Strogomishte, Dolno Strogomishte, Bukojchani, Zajas, Kolibari, Trapchin Dol, Crvici, Rashtani, Osoj and Kichevo.	Information boards, mass media, internet; documents, face to face meetings.	LAF, NTS, grievance mechanism, ESIA, SEP, ESAP, timeline of construction and location of Project structures (underpasses, tunnels etc.).	Immediate	Project CLO	PESR head office
Disclose ESIA documentation	Local communities in Gorno Strogomishte, Dolno Strogomishte, Bukojchani, Zajas, Kolibari, Trapchin Dol, Crvici, Rashtani, Osoj and Kichevo. Other interested parties: NGOs, Local Village councils	Documents	ESIA, NTS, SEP, LAF, ESMP and ESAP.	Immediate	Project CLO	PESR head office
Communication on Project development, LAF, ESIA and permitting	Roma Democratic Development Association (RDDA) SONCE for the Roma families living in Pevci. ROMACTED programme, or the Kichevo Roma	Telephone, emails, face to face meetings	Detailed Project information on request, LAF and NTS on request.	Immediate	Project CLO	NGO offices and PESR head office

Activity	Stakeholders	Information Materials/ Communication Methods	Information to be Disclosed	Timeframe / Frequency	Responsibility	Location
	Social Housing Programme. Albanian Women Organisation, Kichevo Organisation for Youth Development, Kichevo					
Communication on Project-related and potential job opportunities	Regional public	Newspapers, radio, internet, local centres (e.g. schools, cafes, local supermarkets etc.)	NTS, grievance mechanism and vacancies.	Prior to construction	PESR	PESR head office and local authority offices
Review and discuss Project environmental monitoring requirements with Ministry of Environment and Physical Planning	Permitting Authorities	Telephone, emails, face to face meetings	Detailed Project information on request and NTS on request.	Operation stage, then on-going	PESR	Ministry of Environment and Physical Planning head office
Communicate vacancies and workers' rights	Local youth and residents, Construction workers	Information boards, meetings in construction workers welfare facilities	Vacancies and Employee HR procedures.	During the Project lifetime	PESR	Construction offices/welfare facilities
Organise focus groups and workshops for affected vulnerable groups, households near to construction, informal people, women, the disabled, pensioners regarding Project impacts	Vulnerable groups (see left column)	Face to face workshops, radio, round table meetings	NTS, SEP and presentation of materials for vulnerable group(s).	Prior to construction/upgrade stage and during the Project lifetime	PESR CLOs in collaboration with local authorities	Village community centres or local authority offices
Community construction and Road Safety awareness raising programme	Local residents and children	Use of flagmen, advanced notice, road safety awareness training in local schools	NTS, SEP, project information brochure, presentation of materials for vulnerable group(s).	Prior to construction and operation	Contractor	Village community centres or local authority offices

7 REPORTING ROLES AND RESPONSIBILITIES

7.1 MONITORING, REPORTING AND FEEDBACK MECHANISMS

- 7.1.1. The PIU Support Consultants will be used for regular monitoring (monthly basis) of the ESAP implementation that should also undertake monthly monitoring of the SEP implementation including the implementation of the grievance mechanism. This will include the examination of documentation on public meeting, information disclosure, media and any other form of stakeholder engagement undertaken as part of the SEP.
- 7.1.2. In addition, the Client will be required to self-report to the EBRD under contract to relay environmental, health, safety and social performance of the Project. The reporting format will be agreed with EBRD on agreement of the contract.

8 GRIEVANCE PROCEDURES

8.1 GRIEVANCE MECHANISM

- 8.1.1. The Local Authorities and the CLO will monitor the communication channels such as media, one-to-one meetings and periodic meetings and will provide feedback as appropriate. An open book will be available for stakeholders participating in public consultation meetings and will be available at the Local Authority offices to record comments both anonymously and with the option to provide contact details. This book will be presented in an obvious area of the exhibition but in an area, that will not be directly monitored by host staff (e.g. by the exit). The Local Authorities and the CLO will record this information so that a response and feedback can be provided for those stakeholders that provide contact details. It should be made clear to those recording comments that a response cannot be provided to anonymous comments.
- 8.1.2. North Macedonian law establishes rights of affected citizens (those with formal land rights) to appeal to Courts during the expropriation process as covered above, however it does not require the development of specific grievance mechanisms.

LEVELS AND PROCEDURES OF GRIEVANCE MECHANISM

- 8.1.3. A grievance mechanism (outlined in Appendix B) will be implemented to ensure that the Client is responsive to any concerns and complaints particularly from affected stakeholders and communities. Special care will be focused on the training of the designated staff involved in the management of the grievance mechanism. This grievance mechanism covers both employees and non-employees (i.e. affected people and other relevant stakeholders).
- 8.1.4. Any comments or concerns can be brought to the attention of the client verbally or in writing (by post or e-mail) or by filling in a grievance form (example included – Appendix A). The grievance form will be made available in the mayor's office, schools, community centres and other public places that are easily accessible for all relevant stakeholders, alongside a description of the grievance mechanism. Grievance forms can then be submitted to the contact details provided in Section 8.2.
- 8.1.5. All grievances will be acknowledged within 3 working days and responded to no later than within 30 working days. Specifically, nominated and trained members of staff will record grievance information in a grievance log. This will include stakeholder name and contact details and details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.
- 8.1.6. Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.
- 8.1.7. Appendix C provides a grievance log to record comments, complaints and grievances for monitoring purposes.

8.2 ROLES AND RESPONSIBILITIES

- 8.2.1. The PESR and its CLO in collaboration with local authorities will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process,



communications with identified stakeholder groups, collecting and processing comments/complaints and responding to any such comments and complaints. Depending on the nature of a comment/complaint, some comments or complaints will be provided to the appropriate person in the authorities for a response.

CONTACT DETAILS FOR THE CLO:

Name: Biljana Cvetkovikj

Title: Legal and General Affairs, Project Implementation Unit in PESR

Telephone: +38923118044 ext. 312

Address: Dame Gruev 14, 1000 Skopje, Republic of North Macedonia

Email: biljanal@roads.org.mk

Website: www.roads.org.mk

Appendix A

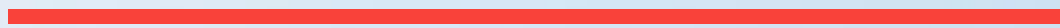
GRIEVANCE REGISTRATION FORM

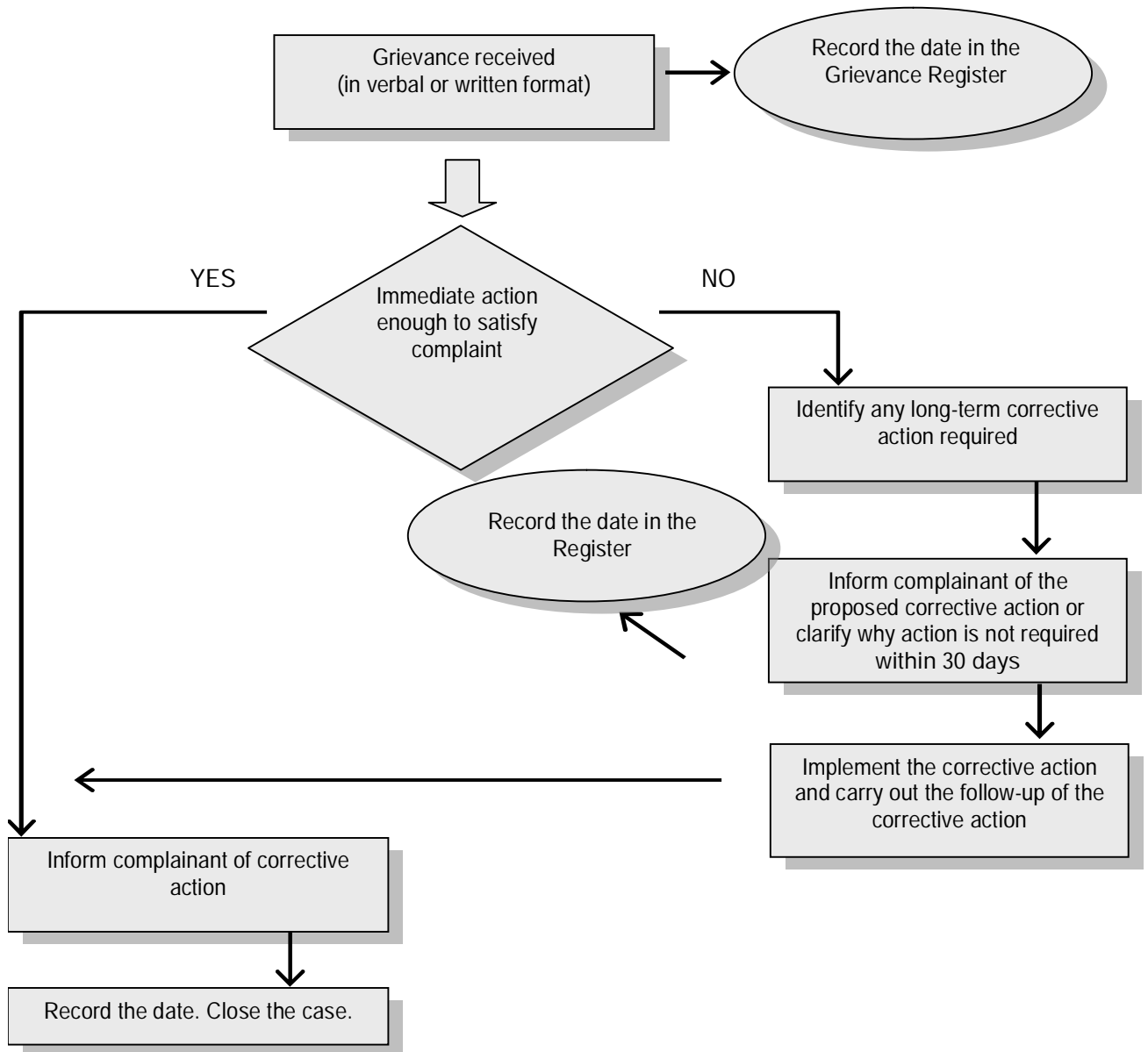


GRIEVANCE REGISTRATION FORM	
CONTACT INFORMATION	
Name:	Gender: <input type="checkbox"/> Male / <input type="checkbox"/> Female
Address:	
Community:	Telephone:
Municipality:	E-mail:
Anonymous grievance: <input type="checkbox"/> Yes / <input type="checkbox"/> No	Preferred mode of communication for feedback: <input type="checkbox"/> Mail / <input type="checkbox"/> Phone / <input type="checkbox"/> E-mail
DESCRIPTION OF GRIEVANCE / SUGGESTION / QUESTION	
Please provide details (who, what, where, when) of your grievance below:	
In case any other actions were undertaken by the complainant with respect to the grievance case, please provide details on past actions (if any):	
Please provide details on your suggested resolution for grievance:	
GRIEVANCE REGISTRATION DETAILS	
Name of registrant:	
Organization:	Position:
How the grievance was lodged: <input type="checkbox"/> in person / <input type="checkbox"/> mail / <input type="checkbox"/> e-mail / <input type="checkbox"/> phone / <input type="checkbox"/> fax / <input type="checkbox"/> _____	Type of grievance: <input type="checkbox"/> Road Safety / Disturbance: Noise, Dust / Damage or Affected Assets
Documents attached:	Grievance is relevant to Project: <input type="checkbox"/> Yes / <input type="checkbox"/> No if "No" it was forwarded to: _____
Remarks:	
Signature of registrant:	Date of grievance:

Appendix B

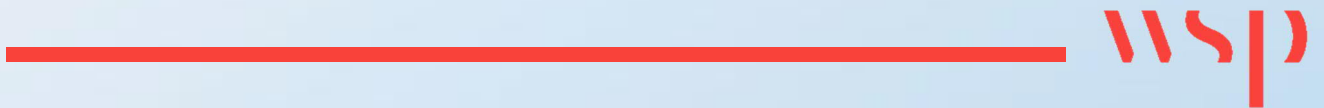
GRIEVANCE MECHANISM





Appendix C

GRIEVANCE LOG





The following template will assist in recording comments, complaints and grievances for monitoring purposes.

Name/Contact details	Date received	Details of complaint/comment	Responsibility	Actions taken	Date resolved

Appendix D

SUPPLEMENTARY SEP





European Bank for Reconstruction and
Development

A2 MOTORWAY: BUKOJCHANI - KICHEVO SECTION

Supplementary SEP





European Bank for Reconstruction and Development

A2 MOTORWAY: BUKOJCHANI - KICHEVO SECTION

Supplementary SEP

PUBLIC

PROJECT NO. 70061173

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INTRODUCTION

- 1.1.1. This Supplementary Stakeholder Engagement Plan (SEP) details the engagement activities which will be undertaken with stakeholders during the 120-day disclosure period, or later, as required, in light of national COVID-19 restrictions (<https://koronavirus.gov.mk/>), and the EBRD guidance on undertaking stakeholder engagement and formation disclosure.. This can be found at the following hyperlink:
<http://www.ebrd.com/documents/environment/ebd-covid19-briefing-note-stakeholder-engagement.pdf>
- 1.1.2. This Supplementary SEP should be read alongside the main SEP document. The main SEP, rather than this Supplementary SEP, will continue to be the document which is revised following Project approval, to inform on-going stakeholder engagement through the various stages of Project development (construction and operation).
- 1.1.3. The Grievance Mechanism outlined in the main SEP and included as an appendix in this document will still apply.

SHORT-TERM STAKEHOLDER ENGAGEMENT PLAN

1.1.4. The table below details the short-term engagement plan for each of the key identified stakeholders.

Key Identified Stakeholders and Methods of Engagement

Stakeholder (Priority stakeholders noted in bold)	Impact on Stakeholders	Purpose of Engagement	Engagement Methods (during the disclosure period)		Methods (Long Term - Deferred)	Limitations
			Current Restrictions	Amended Restrictions ¹		
<p>Local residents and businesses in Gorno Strogomishte, Dolno Strogomishte, Bukojchani, Zajas, Kolibari, Trapchin Dol, Crvici, Pevci, Rashtani; Osoj and Kichevo.</p>	<ul style="list-style-type: none"> These residents will be directly and indirectly affected as part of the Project, where the risks may include noise and air quality effects, property acquisition and access restriction. The Project would benefit this group through creation of direct, indirect and induced employment. 	<ul style="list-style-type: none"> Project information (i.e. scope, programme, nature of works etc.). Project impacts and effects during the construction and operational phase (adverse and beneficial). Mitigation measures to reduce adverse effects. 	<ul style="list-style-type: none"> Disclosure focussing on on-line methods, radio / TV / newspaper announcement (one for each source). Produce a short accessible webinar which is recorded in Macedonian and Albanian. The webinar will be promoted and subsequently the recording shared with the local communities via the PESR's website, the PESR's twitter / Instagram / Facebook accounts. Local leaders and their representative will also be requested to share the webinar via their social media accounts (where / if available). The webinar will also be broadcast on a local TV channel. Online meetings via video platforms with PESR and representatives of the PESR. Provide questionnaires, which includes a short description of the Project, an accompanying map and further contact details will be issued to each household within the surrounding villages. The questionnaires will be accompanied by a self-addressed and pre-paid envelope which will enable individuals to raise queries. The questionnaires will be deposited directly by the local post service to all properties along the Project alignment. The basis for providing a number of questionnaires to each 	<p>As per 'Current Restrictions' column but with face to face sessions with booked slots.</p>	<ul style="list-style-type: none"> Further fully advertised presentation prior to construction commencing. For vulnerable groups the PESR will facilitate regular focus groups and workshops in order to consult with this group through face to face meetings organised by the Community Liaison Officer. 	<ul style="list-style-type: none"> Short term engagement may not capture vulnerable people holistically. Some individuals may not be able to complete or return the questionnaires. Some individuals may not have internet access.
<p>Physically and economically displaced households.</p>						
<p>Vulnerable Groups:</p> <ul style="list-style-type: none"> Single parent headed households; Households with more than three children; and People with low literacy levels. <p>Representatives/ Organisations for vulnerable groups:</p> <ul style="list-style-type: none"> Roma Democratic Development Association (RDDA) SONCE for the Roma families living in Pevci 						

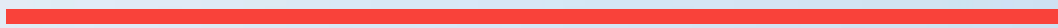
¹ This assumes that non-essential travel within the Project area is permitted for residents, but mass gatherings may still be prohibited.

<ul style="list-style-type: none"> • Albanian Women Organisation, Kichevo • Organisation for Youth Development, Kichevo 			<p>household is to increase participation (i.e. female representation). Returned questionnaires will be complied by the PESR or their social specialist.</p> <ul style="list-style-type: none"> • After the questionnaires are returned a short question and answer response will be prepared, if appropriate. • Phone calls with organisations <p><i>Note: Vulnerable individuals who may not be able to access the webinar are assumed to be able to view the local TV broadcast.</i></p>			
<p>Non-Governmental Organisations (NGOs).</p>	<p>Indirectly affected as part the Project.</p> <p>This group could directly and indirectly influence the Project through consultation with local communities and the facilitation of environmental and social campaigns.</p>	<p>Project information (i.e. scope, programme, nature of works etc.).</p>	<ul style="list-style-type: none"> • Produce a short accessible webinar² which is recorded in Macedonian and Albanian. The webinar will be promoted and subsequently the recording shared with the local communities via the PESR's website, the PESR's twitter / Instagram / Facebook accounts. • Local government officials within the Project area will also be requested to share the webinar via their social media accounts (where / if available). • The webinar will also be broadcast on a local TV channel. • Phone calls with NGOs 	<p>As per 'Current Restrictions' column.</p>	<p>Official correspondence and online meetings as needed alongside media/press releases.</p>	<p>Some individuals may not have internet access.</p>

² Content likely to include: project background, project description, project programme, Environment and Social Due Diligence, environmental and social effects and mitigation and the next steps.

Appendix A

GRIEVANCE MECHANISM





GRIEVANCE REGISTRATION FORM	
CONTACT INFORMATION	
Name:	Gender: <input type="checkbox"/> Male / <input type="checkbox"/> Female
Address:	
Community:	Telephone:
Municipality:	E-mail:
Anonymous grievance: <input type="checkbox"/> Yes / <input type="checkbox"/> No	Preferred mode of communication for feedback: <input type="checkbox"/> Mail / <input type="checkbox"/> Phone / <input type="checkbox"/> E-mail
DESCRIPTION OF GRIEVANCE / SUGGESTION / QUESTION	
Please provide details (who, what, where, when) of your grievance below:	
In case any other actions were undertaken by the complainant with respect to the grievance case, please provide details on past actions (if any):	
Please provide details on your suggested resolution for grievance:	
GRIEVANCE REGISTRATION DETAILS	
Name of registrant:	
Organization:	Position:
How the grievance was lodged: <input type="checkbox"/> in person / <input type="checkbox"/> mail / <input type="checkbox"/> e-mail / <input type="checkbox"/> phone / <input type="checkbox"/> fax / <input type="checkbox"/> _____	Type of grievance: <input type="checkbox"/> Road Safety / Disturbance: Noise, Dust / Damage or Affected Assets
Documents attached:	Grievance is relevant to Project: <input type="checkbox"/> Yes / <input type="checkbox"/> No if "No" it was forwarded to: _____
Remarks:	
Signature of registrant:	Date of grievance:

wsp