

## ABBREVIATIONS

AD	Akcionersko Društvo (Joint Stock Company)
CSO	Civil Society Organization
EBRD	European Bank for Reconstruction and Development
EEP	Elaborate for Environmental Protection
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESA	Environmental and Social Assessment
ESM	Elektrani na Severna Makedonija
ESP	Environmental and Social Policy
EU	European Union
GRNM	Government of the Republic of North Macedonia
MW	Megawatt
NGO	Non-governmental Organisation
NTS	Non-technical Summary
OG	Official Gazette
PAP	Project Affected People
PIU	Project Implementation Unit
PR	Performance Requirements
PV	Photovoltaic
RM	Republic of Macedonia
SEP	Stakeholder Engagement Plan
TPP	Thermal Power Plant

# 1 INTRODUCTION

## 1.1 Background

The European Bank of Reconstruction and Development (EBRD) is considering providing finance to the public enterprise for electricity production Elektrani na Severna Makedonija, AD Skopje ("ESM" or "the Project") from Republic of North Macedonia, to finance the development and construction of a second 10 MW photovoltaic (PV) plant (the Project or Oslomej-2) at the existing Oslomej Thermal Power Plant (TPP) area, next to the PV Photovoltaic Project in development PV Oslomej-1 in Municipality of Kichevo, North Macedonia.

Given the scale and nature of the Project, EBRD has assigned the Project to Category B under its Environmental and Social Policy 2019.

This Stakeholder Engagement Plan (SEP) describes the engagement activities being undertaken for the Project during planning, construction and operation. It has been prepared alongside a Non-Technical Summary (NTS) of an Environmental and Social Assessment (ESA) and Environmental and Social Action Plan (ESAP) prepared for the purposes of the Project.

## 1.2 Objective and Scope of the Stakeholder Engagement Plan

This SEP was developed to set out the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

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

This SEP will be reviewed, and if necessary updated, at least annually so that it remains relevant to the status of the Project and its stakeholder engagement needs.

# 2 PROJECT DESCRIPTION

As a result of adopted **National Energy Development Strategy until 2040** that sets goals for increased use of renewable resources in electricity production and consumption by 2030 (up to 33%), in compliance with EU and Energy Community, ESM has developed a project for construction of a second Photovoltaic (PV) Plant at Oslomej with 10 MW, for exploitation of solar energy widely available in this part of the country.

PV Oslomej 2 is proposed to be realized as a continuity of PV Oslomej 1. It is to be developed on land owned by ESM and the location is at short distance from the substations and road infrastructure, that is in the immediate vicinity of an already operating thermal power plant Oslomej, giving access to a trained workforce. The Project will also rehabilitate barren land on a former mining overburden site within the former lignite mine. The Project will therefore ensure beneficial re-use of currently unused industrial land.

The project footprint is located in the vicinity of the village of Oslomej, in the western part of Macedonia. The nearest city is Kichevo, situated approximately 7 km south-west from the Project footprint. The nearest residential

communities are the village of Oslovej (approximately 1 km north-west of the Site), Zhubrino (approximately 2 km north-east), Srbica (approximately 2.5 km north-east) and Shutovo (approximately 2 km south-east).

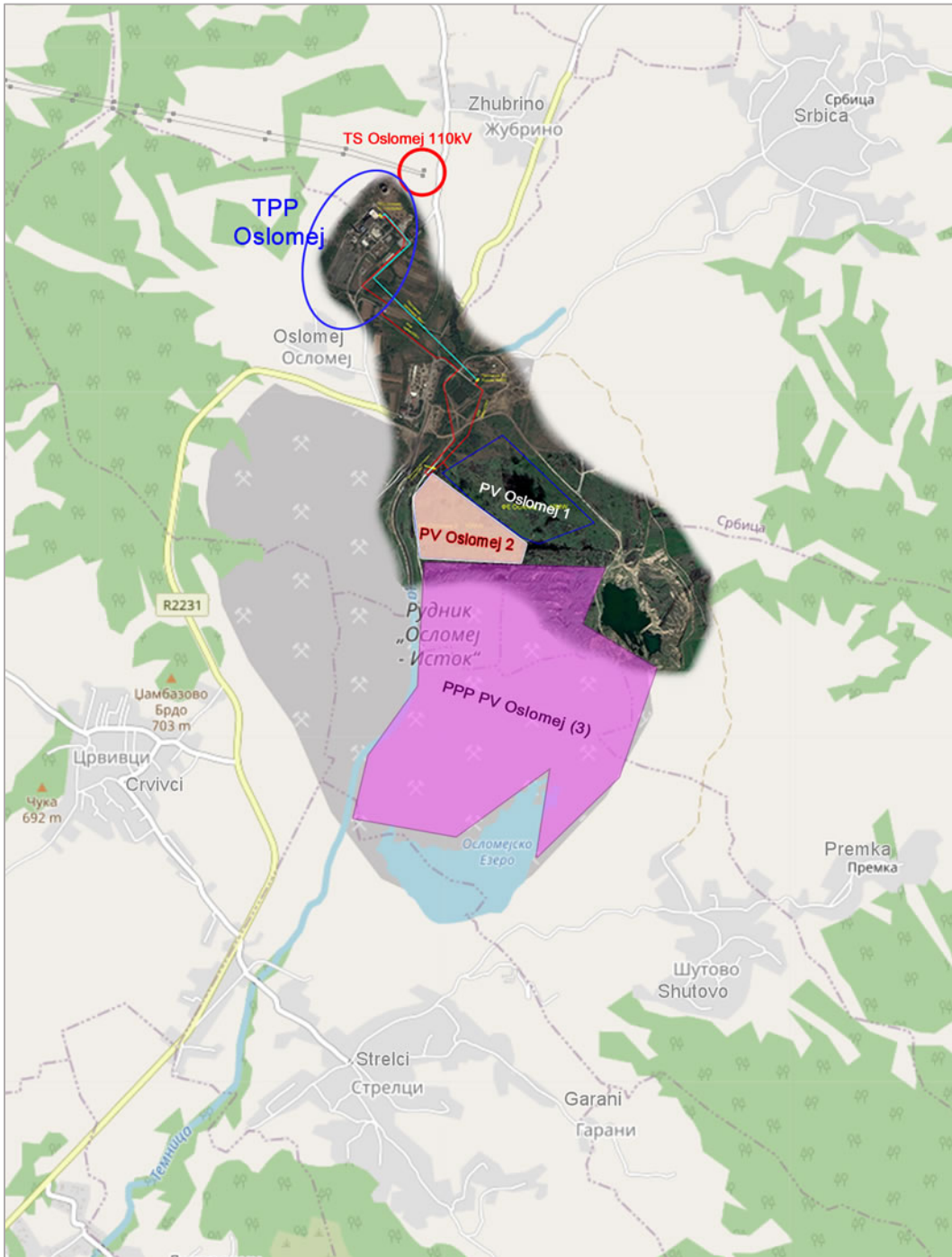


Figure 1: Map of settlements that define the Project area

## 3 LEGAL AND POLICY FRAMEWORK FOR STAKEHOLDER ENGAGEMENT

### 3.1 National Legislation for Stakeholder Engagement

Requirements for public disclosure and consultation activities related to preparation of project documentation and related strategic and other studies are covered under the following laws:

- **Law on Spatial and Urban Planning** (OG of RM, no. 199/14, 42/14, 44/15, 193/15, 31/16) - regulates the system of spatial and urban development of Macedonia, including public information and participation throughout the process of development and adoption of urban and spatial planning documents.
- **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). This law and its associated secondary legislation sets out the requirements for undertaking environmental impact assessment (EIA) of potential environmental impacts of public and private projects which are likely to have a significant impact on the environment before development consent / construction permit is granted in the form of approval for project implementation.

In summary, the procedures for disclosure and consultations include the following steps:

- The public is informed about details of disclosure of the draft plan/document (where the hard copy is available for review, the dates and time when it can be reviewed) through the media and citizens/organizations are invited to send comments and/or attend public consultations;
- Public consultations are held in an appropriate local venue (e.g. city hall) and the plan/document is presented;
- Comments received from all stakeholders are processed and the plan/document is revised to reflect them. A report on which comments have been adopted and which have not, with a justification, is delivered together with the draft plan/document to relevant authorities who judge whether the comments have been meaningfully considered and addressed;
- All comments are responded to in written form.

The public has to be involved in every stage of the EIA procedure and all decisions made during the process must be published in the appropriate media. The following documents will be publicly disclosed:

- Notification of intention for project implementation
- EIA Screening & Scoping Decision
- Announcement of Availability of the Elaborate for Environmental Protection (EEP)
- MoEPP Decision on granting consent to, or rejecting the application for the project.

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

- The Law on Construction (OG of 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, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 30/16, 31/16, 39/16, 71/16, 132/16 and 35/18)
- The Law on Access to Public Information (OG of RM no. 13/06, 86/08, 06/10, 42/14, 148/15)
- The Law on Acting upon Complaints and Proposals (OG of RM no. 82/08, 13/13, 156/15, 193/15).

In 1999, Macedonia signed up to the terms of the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (1998). 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. It focuses on interactions between the public and public authorities.

### 3.2 EBRD Environmental and Social Policy

EBRD has set out a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (Information Disclosure and Stakeholder Engagement) of EBRD’s Environmental and Social Policy (ESP) 2019 emphasises the importance of an open and transparent engagement between the project, its workers, local communities directly affected by the project and other stakeholders as an essential element of good international practice and corporate citizenship. Stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

In accordance with PR 10, projects are required to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale of the risks, impacts and development stage of the project, and conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

EBRD requires that project developers establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints and concerns are received, handled and resolved effectively, in a prompt and timely manner.

## 4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Key stakeholders who are to be informed and consulted about the Project are:

- A) Affected or likely to be affected by the project (Project-affected parties); and
- B) May have an interest in the project (Other interested parties).

### 4.1 Stakeholder Identification

The following table presents the stakeholder identification and analysis of the approach for communicating these individual stakeholders.

**Table 1** Stakeholder analysis and communication requirements

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
<b>Project-affected parties</b>			
<p><b>Local residents</b> living in the settlements next to the Project footprint (aerial distance up to 3 km) or in the wider Project area (more than 3km), and are experiencing the effects of Project related construction and operation activities.</p> <p>Settlements are:</p>	<p>Potential interest in health and safety issues related to project</p> <p>Disruption of daily routine and paths of movement of people</p>	<p>Providing timely information on risks and disturbances associated with the construction and operation period</p>	<ul style="list-style-type: none"> <li>▪ Online Social Media (Facebook, YouTube, Instagram), Official website, Viber &amp; WhatsApp, other.</li> <li>▪ Disclosing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board of the three affected municipalities, at least two weeks prior to the start of</li> </ul>

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
a) Up to 3km: Garani, Zhubrino, Oslomej, Premka, Srbica, Strelci, Crvici, and Shutovo b) More than 3 km: Kjafa, Papradishte, Berikovo, Jagol, Jagol Dolenci, Tuin, Popovjani, Arangel and Novo Selo			any construction works, and a week prior any significant change in the construction phase that is of particular interest to the local affected population
<b>Municipality of Kichevo</b>	Interest in development project, health and safety of local population	Providing timely information on risks and disturbances associated with the construction and operation period	<ul style="list-style-type: none"> <li>▪ Online presentation materials.</li> <li>▪ Media/press releases.</li> <li>▪ Public consultation meetings, if possible.</li> <li>▪ Direct email and phone communication</li> <li>▪ Online Social Media (Facebook, YouTube, Instagram), Official website, Viber &amp; WhatsApp, other.</li> </ul>
<b>Other interested parties</b>			
<b>General public</b> in the affected municipalities	Existence of Project related construction activities.	Providing timely information on Project benefits and risks	<ul style="list-style-type: none"> <li>▪ Online presentation materials.</li> <li>▪ Media/press releases.</li> <li>▪ Public consultation meetings, if possible.</li> <li>▪ Online Social Media (Facebook, YouTube, Instagram), Official website, Viber &amp; WhatsApp, other.</li> </ul>
<b>Relevant government authorities, ministries and public institutions, including:</b> <ul style="list-style-type: none"> <li>• Ministry of Environment and Spatial Planning</li> <li>• Ministry of Finance</li> <li>• Ministry of Infrastructure and Communication</li> <li>• Ministry of Labour and Social Policy</li> <li>• Ministry of Economy</li> <li>• State Labour Inspectorate</li> <li>• State Environmental Inspectorate</li> <li>• Ministry of Agriculture, Forestry and Water Economy</li> <li>• Energy Regulatory Commission</li> <li>• Protection and Rescue Directorate</li> </ul>	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"> <li>▪ Online individual consultation meetings as necessary.</li> <li>▪ Public consultation meetings, if possible.</li> <li>▪ Direct email and phone communication</li> </ul>

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
<p><b>Interested Non-governmental Organisations (NGOs, e.g. Environmental, Social Welfare, and Others)</b></p> <p>All organisations that have not yet demonstrated a specific interest in this Project, shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation.</p> <p><b>Note:</b> Any organisations interested in the Project can send their contact details to the PIU to be included in the Table of NGOs provided in Annex 4 of this SEP and notified directly about Project events.</p>	<p>Stakeholders of high significance for the Project's success which are interested in protection of the environment and human health</p>	<p>Providing timely information, communication and consultations</p>	<ul style="list-style-type: none"> <li>▪ Online individual consultation meetings as necessary. Public consultation meetings, if possible.</li> <li>▪ Direct email and phone communication</li> <li>▪ Media/ press releases</li> <li>▪ Online Social Media (Facebook, YouTube, Instagram), Official website, Viber &amp; WhatsApp, other.</li> </ul>
<p><b>ESM (and PIU) and relevant Trade Unions and worker's organisations</b></p>	<p>Stakeholders of high significance for the Project's success who are directly or indirectly engaged in Project planning and implementation</p>	<p>Providing timely information about the planned Project activities</p>	<ul style="list-style-type: none"> <li>▪ ESM internal communication channels.</li> </ul>
<p><b>Contractors</b> or subcontractors during construction, monitoring and supervision of works, and their employees, and maintenance related workers</p>	<p>Stakeholders of high significance for the Project's success who are directly or indirectly engaged in Project planning and implementation</p>	<p>Provision of Project code of conduct and work safety and health regulations, environmental protection requirements</p>	<ul style="list-style-type: none"> <li>▪ Information through tender procedure and contracts.</li> <li>▪ Communication via supervising engineers.</li> <li>▪ Toolbox talks at construction sites on health and safety topics.</li> <li>▪ Monthly reports on progress of works to be submitted by contractors during construction works</li> <li>▪ Trainings</li> <li>▪ Email communication.</li> </ul>
<p><b>Businesses</b></p> <ul style="list-style-type: none"> <li>• Trade and Retail</li> <li>• Transport domain</li> <li>• Other private sector stakeholders</li> </ul>	<p>Involvement in development of project activities suitable to their needs and capacities</p>	<p>Informed businesses who will need to adjust their investments and operations to the planned outcomes of the project</p>	<ul style="list-style-type: none"> <li>▪ Online individual consultation meetings as necessary. Public consultation meetings, if possible.</li> <li>▪ Direct email communication</li> <li>▪ Media/ press releases.</li> </ul>



Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
<b>Donors and Other International Organizations</b> <ul style="list-style-type: none"> <li>• Other</li> </ul>	Stakeholders of high significance for the Project's success who are directly or indirectly engaged and involved in project planning and financing of its implementation	Realization of addressed support and finances	<ul style="list-style-type: none"> <li>▪ Direct email communication.</li> <li>▪ Media/ press releases.</li> <li>▪ Online Social Media (Facebook, YouTube, Instagram), Official website, Viber &amp; WhatsApp</li> <li>▪ Public consultation meetings, if possible.</li> </ul>

## 4.2 Disadvantaged / vulnerable individuals or groups

Elderly people are present in the Project area. There has been continuous youth migration from the smaller settlements in the Project area toward bigger urban centres in the country (rural-urban migration), or abroad. Elderly people remain to live in the settlements located in the vicinity of the Project footprint.

## 5 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Since a similar PV project is already in development (PV Oslomej 1) adjacent to the current Project, Stakeholders have already been involved from beginning of the planning phase for this project.

For the PV Oslomej 1 project, the Ministry of Transport and Communication organised a public disclosure on the 23.09.2020, in the premisses of the Council of the Municipality of Kichevo. A public notice was publicised in two daily newspapers, in Macedonian and Albanian languages, on 14.09.2020.

In regards of the Stakeholder Engagement, the following schedule for PV Oslomej 1 project, has been realised:

- 12.08.2020 - Project Grievance Form and Public Grievance Leaflet, as well as a Non-technical Summary (NTS) of an Environmental and Social Assessment was sent out to all stakeholders according to SEP (English, Macedonian, Albanian and Turkish version)
- 12.08.2020 – All relevant documents were publicised on ESM's website
- 14.08.2020 - e-mail to all stakeholders with all relevant information and documents
- 14.09.2020 - Invitation for Public Consultation
- 23.09.2020 - Public Consultation and Project Information Disclosure.

The stakeholder engagement activities as well as public disclosure of relevant documentation and information for Oslomej-1 will continue into the future.

For Oslomej-2, ESM has not yet initiated its public stakeholder engagement activities. For projects that have lower significance of environmental and social impacts and risks, the government anticipate creation of EIA/Environmental Elaborate Report. National legislation does not provide for public disclosure and consultation for EIA Elaborate Reports. Nevertheless, ESM has disclosed the EIA Elaborate Report, along with Approval of EIA Elaborate Report issued by the Ministry of Environment and Spatial Planning for Oslomej-2 on its website, at this stage in Macedonian language only.

## 6 STAKEHOLDER ENGAGEMENT PROGRAMME



## 6.1 COVID-19

The COVID-19 pandemic has changed the familiar and widely used methods for information disclosure and stakeholder engagement<sup>1</sup>.

In order to avoid exposure and transmission of infection to the maximum extent possible, stakeholder engagement and information disclosure methods for this Project are tailored to reflect the recommendations given by the most relevant international and national health organizations and relevant actors who are modelling and defining good international practice.

The GRNM, on the 03.11.2020<sup>2</sup>, issued a ***Decision on Preventive recommendations, temporary measures, ordered measures, purposeful protocols, plans and algorithms of actions for protection of the population's health from the infectious diseases COVID-19 caused by the virus SARS-CoV-2, the cases and the time period of their application.***

## 6.2 Proposed Strategy for Information Disclosure and Consultation

For the Project's purposes, ESM will use different methods of stakeholder engagement in order to ensure continuous communication with all interested stakeholders and to make all necessary information available and accessible to the public. ESM in cooperation with Municipality of Kichevo, as well as local communities affected by the Project will ensure that local residents and businesses living or operating in the vicinity of the Project are regularly informed about the Project development especially addressing start of construction activities and its impacts on the local residents and businesses.

The ESM and PIU will carry out public consultations and information dissemination that will reflect main issues of relevance to the Project.

A Public disclosure package for Project will contain:

- EIA Elaborate Report and its approval;
- Non-technical Summary (NTS) of an Environmental and Social Appraisal;
- This Stakeholder Engagement Plan – (SEP);
- Environmental and Social Action Plan– (ESAP); and
- Project Grievance Form (see Annex 1)

Documents will be published on ESM web site ([www.esm.com.mk](http://www.esm.com.mk)), and the web sites of Municipality of Kichevo. Documents will be prepared in Macedonian, English and Albanian language and be available upon their official approval.

Printed copies of the public disclosure package will be available in ESM premises. In addition, printed copies will be available in Project's local office premises as well as on construction site – Contractor's office, upon beginning of construction works.

The documents will remain disclosed on the websites of ESM and municipality during a period of 30 calendar days prior to consideration of the Project by the EBRD Board of Directors and local national procedure, and will remain

---

<sup>1</sup> Stakeholder engagement (PR10) EBRD briefing note - COVID-19; 15 April 2020 (available on: <https://www.ebrd.com/documents/environment/ebrd-covid19-briefing-note-stakeholder-engagement.pdf?blobnocache=true>)

<sup>2</sup> The Official Gazette of the Republic of North Macedonia, Number 263/20, from 04.11.2020.

publicly available throughout the life of the Project.

The PIU and ESM will schedule and hold at least one public consultation meeting after disclosure of the above listed documents. ESM will inform all stakeholders about the exact date, time and venue where the meeting will be held, at least 7 days in advance (but preferably 2 weeks), through disclosure through the websites of the ESM [www.esm.com.mk] and Municipality of Kichevo [www.kicevo.gov.mk], local media (newspapers, online news portals). The announcement of the public meeting will also be posted in the affected neighbouring settlements, in order to specifically target the local population living in these communities. In addition, NGOs listed in Annex 4 to this SEP will be directly contacted and informed of the public meeting.

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

The meetings will be aimed at providing information to the public about the construction and operation of the Project. Participants will be able to present their opinions and remarks with regard to the Project, as well as suggest possible solutions of the issues raised. The conclusions of the meeting will be agreed during the meeting and recorded. All justified comments and proposals will be considered and appropriately addressed. The PIU will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

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

Table 2: Summary of Stakeholder Engagement and Disclosure Requirements

	Activity	Timing/further detail	Responsibility
1	<p>Ensure that the following Project documents are publicised on the websites of the ESM and municipalities in Macedonian, English and Albanian language:</p> <ul style="list-style-type: none"> <li>• This SEP</li> <li>• EIA Elaborate Report and its Approval</li> <li>• Non-technical Summary (of an environmental and social appraisal)</li> <li>• Project Grievance Form</li> <li>• Environmental and Social Action Plan</li> </ul> <p>Print and keep hard copies of documents at premises of ESM, TPP and Mine Oslomej, and the Municipality of Kichevo</p>	<p>All available Project information and documents will be disclosed to the public as soon as available, but at least 2 weeks in advance prior to the public meeting in item (2) below.</p>	<p>PIU/ESM</p>

	Activity	Timing/further detail	Responsibility
2	<p>Organise at least one public consultation meeting after disclosure of the above listed documents</p> <p>Encourage written proposals and comments</p> <p>Provide timely access to the documents before any meeting (at least 2 weeks)</p>	<p>Stakeholders will be informed about the exact date, time and venue where a meeting will be held, at least seven days in advance (but preferably 14 days), through disclosure through the websites of the ESM, local media and the bulletin boards of the Municipalities, as well as affected settlements.</p> <p>NGOs listed in Annex 4 to this SEP will be directly contacted and informed of the public meeting.</p>	PIU/ESM
3	Organise individual consultation meetings	As needed or requested by the ESM, Municipality or by any identified stakeholder groups/individuals	PIU/ESM
4	Document all opinions, remarks and possible solutions with regards to the Project raised by stakeholders during consultation meetings, and address appropriately	Ongoing	PIU/ESM
5	Publicise information about the extent, timing and duration of planned construction works, and any expected disruptions and inconveniences via the websites of the ESM and affected municipality	Two weeks prior to the start of ESM construction works	PIU/ESM
6	Publicise relevant information regarding project activities and Project environmental and social performance via the websites of the ESM and affected municipality, as well as at the visible locations throughout the affected local communities	Bi-monthly, during the construction period	PIU/ESM and Contractor

Throughout the life of the Project, ESM, PIU and the Contractor(s) engaged to undertake the Project will continue to engage with stakeholders and this Stakeholder Engagement Plan will be updated to reflect Project progress. The SEP will be reviewed, and if necessary updated prior to construction commencing to capture any issues raised during the pre-construction consultations. Issues raised during the construction process will be documented and a response provided through the mechanisms described in this SEP.

Information Boards will be installed at the entrance of the Project area and every neighbouring settlement by the main Contractor (unless existing community notice boards are available and can be used), and will serve as a media tool/channel for communications with the local residents. Information in relation to the Grievance Mechanism will also be included.

The Contractor will secure sites prior to any construction activities taking place and will ensure appropriate construction and warning signs are in place.

## **7 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES**

A Project Implementation Unit (PIU) will be established within ESM. This body will be responsible for Project implementation, including implementation of this SEP. The PIU consists of Head of PIU (appointed by the Oslomej Management), the Project Manager of the PV Plant and three PIU members (appointed by ESM).

For the purpose of effective realisation of planned stakeholder engagement activities, the PIU will use its own financial means. The Contractor will be responsible for its own costs made on behalf of the required stakeholder engagement activities for this Project.

A responsible person will be appointed by PIU for implementation of this SEP during the entire Project cycle, and in charge of communicating with the communities. Her/his contact information shall be updated if needed.

All contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of SEP (see Chapter 6 for more details). The grievance mechanism requirements (see Chapter 8) will be laid out in the tender documentation and contracts signed with the contractors.

## **8 GRIEVANCE MECHANISM**

ESM, on behalf of this project, will establish a grievance procedure whereas all stakeholders will be informed on grievance mechanism, contact persons from ESM responsible for implementation of grievance mechanism as well as the forms of submitting complaints.

Project Grievance Leaflet and Grievance Form (Appendix 1) will be available on the websites of ESM and affected municipality of Kichevo in Macedonian and Albanian languages. Printed copies (also in Macedonian and Albanian languages) will also be made available in ESM's main premises in Oslomej (TPP Oslomej), as well as in premises of the municipality of Kichevo. If the Municipality receives a grievance (in printed form or by e-mail) they will deliver these to ESM within 3 days of receipt. Additionally, any comments provided by stakeholders can be communicated personally or by telephone or in writing in the grievance form.

A Grievance Form may also be submitted to the Contractor during construction works. Grievance Leaflet and Form will be available on construction site, in Macedonian and Albanian language, in printed forms whereas Leaflet will be posted on the construction site bulletin board in order to be visible to the public and interested parties. Contractor is obliged to forward all received grievances to the project's contact person in PIU.

All grievances will be recorded in a Grievance Registry (Appendix 3) and acknowledged in 7 calendar day period. The stakeholder-complainant will be informed by ESM about proposed corrective measures and actions taken within 15 calendar days upon the acknowledgement of grievance. If ESM is not able to solve the issue or if no action is required, ESM will provide explanation and justification to the complainant how to further proceed with the grievance if the complainant is not satisfied with the outcome. Complainants can address other legal remedies in accordance with national laws and regulations.

PIU will monitor the way in which grievances are handled and will maintain a record of grievances received (in a Grievance Register; see Annex 3) including those delivered by the Contractor. The Registry will serve as a basis for completing grievance management reports that will be included into the Annual Environmental and Social reports

to the Bank (see Chapter 9).

PIU will publish and regularly update all relevant documents and grievance procedures on its website as well as provide hard copies of Grievance Forms to the municipality of Kichevo. PIU will provide feedback to all stakeholders who fulfilled Grievance form by e-mail or mail. PIU will communicate with all relevant stakeholders and will inform them about any changes in the Project dynamics where all updates will be published on ESM and municipal web site and provided leaflets to the local communities in the affected Project area.

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

A separate grievance mechanism will be available for workers.

Contact information for enquiries and grievances:

Attention: Office of General Manager and

Julija Simjanovska – Environmental

Address: 11 October str. 9, Skopje

Tel/Fax: + 02 3149 121

E-mail: [contact@elem.com.mk](mailto:contact@elem.com.mk);

[julija.v.simjanovska@elem.com.mk](mailto:julija.v.simjanovska@elem.com.mk) (in cc)

## 9 MONITORING AND REPORTING

ESM together with local authorities from the Municipality of Kichevo will be responsible for monitoring PIU implementing activities in the sphere of the Project's stakeholder engagement, as well as communication channels, particularly with the PAPs.

In order to summarise stakeholder engagement process, the PIU will prepare separate monitoring report (Stakeholder Engagement Activities Report) whereas the first report should be produced three months upon start of the Project construction activities and will be continued on a semi-annual basis until completion of construction works. After Project completion, PIU will develop annual Monitoring report during the operation phase. Monitoring reports should contain information about:

- Consultation meetings with stakeholders (place, time, issues discussed, mitigation measures provided by PIU)
- Grievances identified in the reporting period (and all detailed information about it)
- PIU will also report on stakeholder engagement activities (on annual basis), to the EBRD
- Each Stakeholder Engagement Activities Report for this Project will be published on the ESM web site for public review and further comments.

PIU will invite external monitoring by interested NGO/CSO in the local area to monitor implementation of SEP activities.

Indicators to be monitored during SEP implementation are:

- All stakeholders are communicated prior to Project activities starting.
- Dissemination of information – availability and accessibility of Project documents; frequency of distribution of information, reached stakeholders;
- Realization of planned engagement activities – the number and level of participation by specific stakeholder groups;
- Number of vulnerable groups identified and communicated;
- Minutes of meetings created;
- Correction actions delivered;
- Numbers and type of grievances;
- Compliance with the grievance mechanism – Completed records in grievance log (Annex 3);
- Number of repeated grievances.

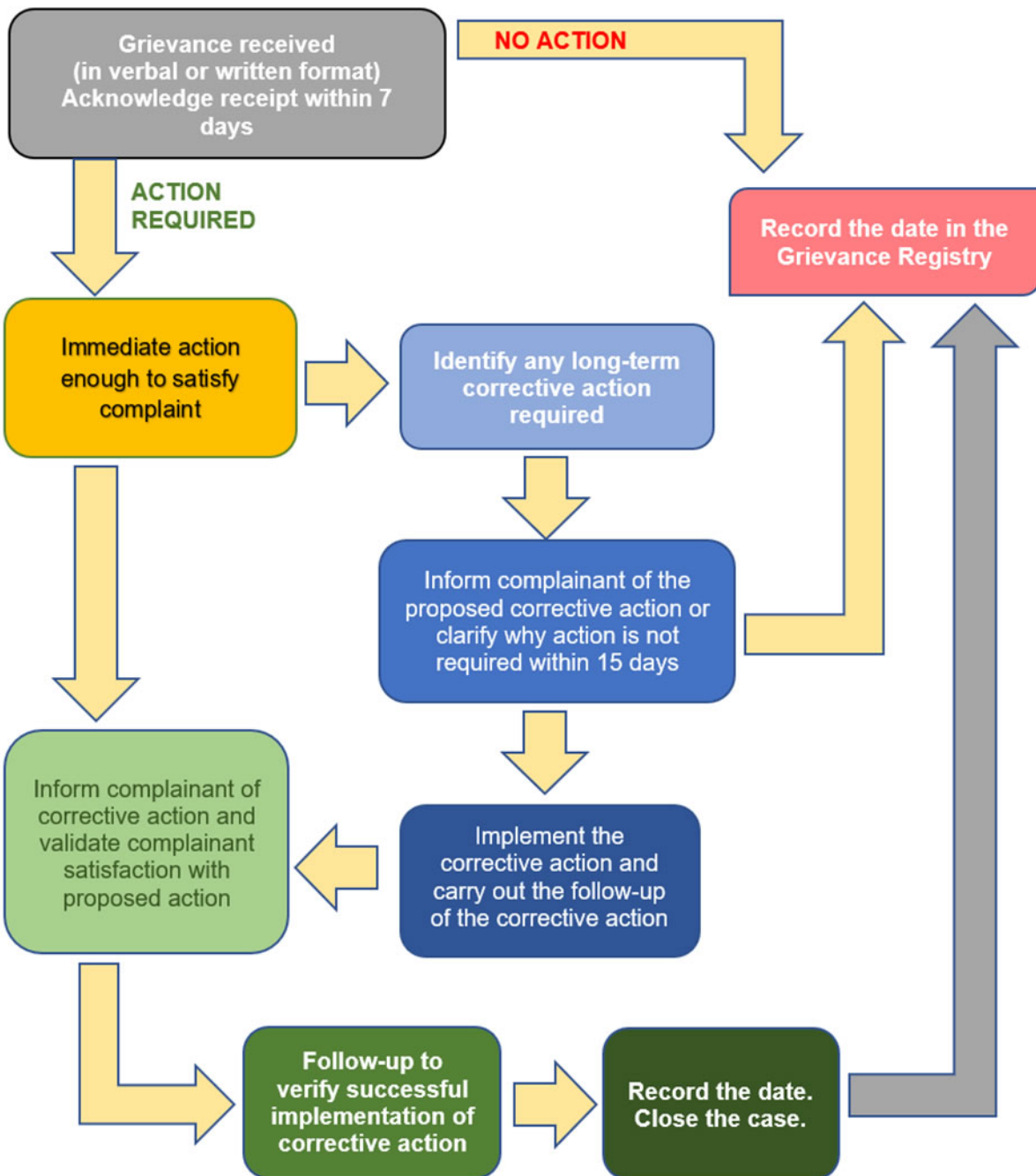
## **ANNEXES**



## ANNEX 1: PROJECT GRIEVANCE FORM

<b>Reference No:</b>	
<b>Full Name and Surname:</b> <i>(you can remain <b>anonymous</b> if you prefer or request not to disclose your identity to the third parties without your consent)</i>	
<b>Contact information:</b> Please mark how you wish to be contacted (mail, telephone, e-mail)	<ul style="list-style-type: none"> <li>• <b>By Post:</b> (Please provide postal address) _____</li> <li>• <b>By phone:</b> _____</li> <li>• <b>By e-mail:</b> _____</li> </ul>
<b>Preferred language of communication:</b>	<input type="checkbox"/> Macedonian <input type="checkbox"/> Albanian <input type="checkbox"/> Other: _____
<b>Description of incident/grievance:</b> What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
<b>Date of incident/grievance:</b>	<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
<b>What would you like to see happen to resolve the problem?</b>	
<b>Signature:</b>	<b>Date:</b>
Please return this form to: Office of General Manager and Julija Simjanovska – Environmental email: <a href="mailto:contact@elem.com.mk">contact@elem.com.mk</a> ; <a href="mailto:julija.v.simjanovska@elem.com.mk">julija.v.simjanovska@elem.com.mk</a> (in cc) Tel/Fax: + 389 (0)2 3149 121	Address: Elektrani na Severna Makedonija ul. 11 Oktovmri 9, 1000 Skopje Republic of North Macedonia

## ANNEX 2: PROJECT GRIEVANCE PROCEDURE



## **ANNEX 3: PROJECT GRIEVANCE REGISTER**

The Project Grievance Register, kept in digital format, as a spreadsheet file, should contain the following information:

### **ENTRY:**

Initiator

Location of residence

Type of problem

Name and surname

Contact information

Date of entry

Acknowledgement for receipt of Grievance

### **PROBLEM:**

Description of the Problem

Proposed solution

Actions to be undertaken for problem solving

### **EXIT:**

Date of closure

Grievance's Follow-up

Results of the intervention

Recurrence Y/N.

## ANNEX 4: CONTACT INFORMATION OF IDENTIFIED STAKEHOLDERS

Name of NGO Stakeholders:	Contact Information
Macedonian Ecological Society (MES)	Vladimir Nazor 10, , 1000 Skopje Tel: (02) 2402 773, Fax: (02)2402 774 Mob: 078 393 436 <a href="mailto:contact@mes.org.mk">contact@mes.org.mk</a>
The Ecologists' Movement of Macedonia (DEM) – Skopje	Vasil Gorgov 39, baraka 6, 1000 Skopje Tel: (02) 3220-520 <a href="mailto:dem@dem.org.mk">dem@dem.org.mk</a> <a href="mailto:ruska@dem.org.mk">ruska@dem.org.mk</a>
Centre for environmental research and information "Eko-svest" – Skopje	Blvd 11 Oktomvri 125/12, 1000 Skopje tel: (02) 3217-247 fax: (02) 3217-246 mob: 072 726-104 <a href="mailto:info@ekosvest.com.mk">info@ekosvest.com.mk</a>
Front 21/42	Orce Nikolov 83A, 1000 Skopje Tel/Fax: (02) 3122-546 mob: 075 433-231 <a href="mailto:contact@front.org.mk">contact@front.org.mk</a>
Macedonian Green Centre	Kosta Novakovik 1A/19, 1000 Skopje Tel/Fax: (02) 6132-432 Mob : 078 205 217 <a href="mailto:zeleni@zeleni.org.mk">zeleni@zeleni.org.mk</a>
Bird Study and Protection Society of Macedonia	PMF - Gazi Baba BB, 1000 Skopje, 02/3117-055; 078/254-736 <a href="mailto:brankom@ukim.edu.mk">brankom@ukim.edu.mk</a>
Owl Protection Association	Jurij Gagarin 28-5/3, 1000 Skopje 070/999-859 <a href="mailto:macedonian.owl.trust@gmail.com">macedonian.owl.trust@gmail.com</a>