

SOFIA ELECTRIC BUS PROJECT, BULGARIA

STAKEHOLDER ENGAGEMENT PLAN

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Public

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1. Introduction

Background

This document is a Stakeholder Engagement Plan (SEP) prepared for Sofia Electrical Transport JSC (SETC) describing consultation and disclosure plans, for the project to enhance the electric bus fleet.

Specifically, the European Bank for Reconstruction and Development (the EBRD) is considering providing a loan to SETC of up to €14.7 million to purchase up to 30 fast charging standard low floor electric buses and 12 charging stations, as well as the related spare parts and services.

The SEP takes into account best international practice in relation to information disclosure.

The SEP will be reviewed on a regular basis. If the activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date.

Objectives of the plan

The methods, procedures, policies and actions undertaken by SETC to engage stakeholders, in a timely manner, with respect to the potential benefits and impacts of the project are the key subject of this document.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact Mr. Orlin Prandjev, Head of Innovative Projects Department (contact details have been provided above) and ask to be included in future information and communications. Furthermore, this document describes the way that any concerns or grievances will be handled by SETC.

This document also provides a schedule for consultations / communications, which may be subject to revisions during detailed design / procurement / implementation. The resources available to implement the SEP are also described in this document.

Scope of the Plan

This document covers the following:

- Chapter 2 – Project overview and setting;
- Chapter 3 – Public consultations and information disclosure requirements;
- Chapter 4 – Identification of stakeholder and other affected parties;
- Chapter 5 – Overview of current stakeholder engagement practices;
- Chapter 6 – Stakeholder engagement programme and methods of engagement and resources; and
- Chapter 7 – Grievance mechanism

2. Project Background

Overview of the company

Sofia Electric Transport Company (SETC) is a key structural unit and forms an integral part of the overall public transport system of the capital City of Sofia. The Company is 100% owned by Sofia Municipality, as are the other three structural units; Sofia Bus Transport Company (SBTC), Sofia Metropolitan (i.e. the metro company) and Sofia Urban Mobility Centre (SUMC).

SETC's list of activities include:

- The transportation of passengers by trolleybuses and trams;
- Routine maintenance and repair of the trolleybus and tram fleet , including all on- and off-board equipment;
- Routine maintenance of tram tracks, collection and control of revenues from SETC ticketing system;
- Maintenance and repair of the electric energy supply infrastructure for the traction power needs of trolleybuses and trams; these include the maintenance, repair, overhaul, reconstruction, modernisation and new construction of trolley and tram overhead lines, power substations/transformers.

At present, SETC's remit includes the operation of all trolleybuses and trams in the city. Specifically, it is the designated operator of 14 tram lines and 9 trolleybus lines in total. Assuming that this project is implemented, an additional six routes will be taken over that are currently operated by their counterparts, bus operators , using diesel buses.

Existing tram lines and trolleybus lines operating currently by SETC are presented on Figure 1 and Figure 2 below.

Figure 1: Existing Tram Lines in Sofia

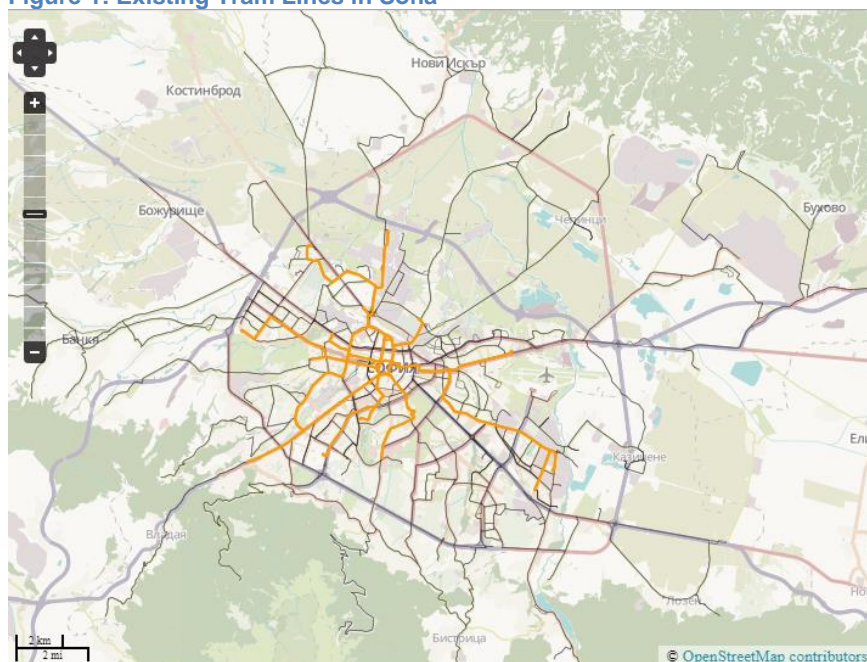
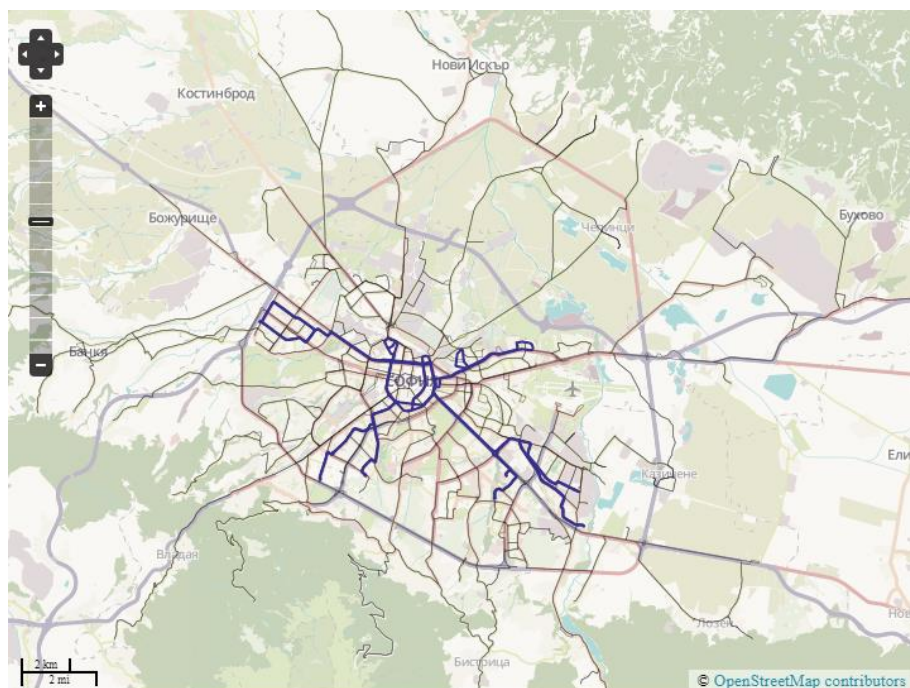


Figure 2: Existing Trolleybus Lines in Sofia



Investment Plans

The new proposed electric bus fleet follows the success of the introduction of 30 electric buses with fast charging technology under a pilot scheme. The results of the pilot scheme demonstrated that electric buses could be operated reliably and efficiently on city centre routes. As a result, and as part of efforts of the city to improve the sustainability of its public transport operations, the City has decided to extend electric bus operations to some bus routes within the city.

The new proposed electric bus fleet will be deployed in two batches of 15, with the second batch dependent on the success of the first batch of 15. These will occupy six existing diesel bus routes, replacing the old diesel models with the new electric models. Initially, the first 15 electric buses would be operated on **line no. 84 and 30**, and after the first year of their operation, SETC plans to purchase a second batch of 15 electric buses and it is expected that these will be used to operate lines **no.14, 42, 47 and 48**. End-to-end route lengths range from 12.0 to 24.1 km.

The new electric bus fleet must meet the technical specifications required to carry out the proposed bus routes, with the SETC opting for fast charging technology at the first and last stops along the chosen route. The charging stations (fast charging points) will be at the first and last stops along each route. Although the SETC operate and maintain electric-based public transport vehicles (trolleybuses and trams) with the related existing infrastructure the electric buses will be deployed in six routes served by diesel/CHG buses which means that electric infrastructure is not present at the first and last stops of the assigned routes. Hence construction works for the installation of charging stations installation and grid connection is foreseen. Land acquisition or economic displacement will not be required.

Electric buses will be parked and maintained in one of the existing trolleybuses depots:

- Depot Nadezhda located at ulitsa "Podpolkovnik Kalitin" 28;
- Depot Iskar located at 7, Bezimenna Street

Rationale for the Project

The City of Sofia is continuing to invest in its transport infrastructure and services in order to incentivise the use of public transport as a sustainable, safer and more environmentally friendly means of meeting mobility demand in the conurbation.

The main objectives established by SETC and the City of Sofia for this project, are to improve the energy efficiency of the city's electric transport and to reduce harmful emissions and contaminants generated by its public transport vehicles. It is expected that the implementation of the project will provide savings of 2/3 of the CO₂ emissions from the diesel buses currently in operation.

Apart from the zero exhaust pipe emissions from the electric buses, SETC also recognises that the electric buses offer greater operational flexibility than trolleybuses and trams as they will not be restricted to corridors with overhead line equipment (OLE).

Overall the planned purchase of 30 new fast charging electric buses will improve the reliability and quality of public transport services for users and the Company, by reducing fuel costs, reducing noise levels and improving air quality through reduced emissions, in compliance with Regulation (EC) No 595/2009 of the European Parliament.

3. Consultation and disclosure

Public consultation and information disclosure undertaken by SETC will comply with the requirements of Bulgarian legislation and best international practice, as described in the requirements of the EBRD.

National legislative requirements

The Republic of Bulgaria became an EU Member State on 1 January 2007, and since then Bulgarian legislation has been harmonised with the EU Directives. Bulgaria ratified the Aarhus convention that governs requirements for public consultation and the access to environmental information and public participation in environmental decision-making. The Aarhus convention stipulates that public's right to be informed about the environmental conditions, the right to public consultations with regards to projects impacting on the environment and the right to file complaints when the public perceives that considerations of environmental issues are insufficient.

The EIA Directive in Bulgaria is implemented in the Environmental Protection Act as well as Regulation on the conditions and the order for implementing environmental impact assessment. This legal framework defines the projects that need to be made subject to EIA, the screening procedure, the competences of the national authorities and the requirements regarding the participation of the public in the EIA decision-making process.

The Regional Inspectorates of Environment and Waters (RIEW) – Sofia, once notified in writing by SETC about the proposed investments, will determine the need for the EIA, and associated public consultation. Optionally RIEW could identify conditions which have to be met by SETC during the construction works.

Best international practice

Stakeholder engagement is an essential requirement of EBRD's PR 10: *Information Disclosure and Stakeholder Engagement*, highlighting the need for on-going stakeholder engagement, which should be meaningful and unbiased and the findings communicated through a document such as this, a SEP. SETC will adopt this SEP including the grievance mechanism. The SEP is developed commensurate to the nature of the investment project and the associated environmental and social impacts and benefits, and the level of anticipated public interest. The programme will be rolled out in a timely manner.

On an annual basis, SETC will prepare and submit report to EBRD on their social and environmental performance, including progress made with the implementation of their Environmental and Social Action Plan (ESAP) that has been developed and also reporting on resolution of grievances (if any) associated with the project.

The key principles of effective engagement for projects are summarised as follows:

- Providing meaningful information in a format and language 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, languages, 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 age, gender, vulnerable and / or minority groups;
- Processes free of intimidation or coercion or incentivisation;

- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

These principles will be reviewed and accordingly adopted by SETC for the project.

General stakeholder communication records maintenance

Communication records will be maintained by SETC clearly logging the key information provided to stakeholders and also the key incoming communications (i.e. general questions, complaints, queries etc.) to SETC along with a summary of the actions taken.

4. Stakeholder identification

IDENTIFICATION of main stakeholders

This section of the document identifies parties, i.e. stakeholders and others affected at a local, district and regional level.

Stakeholders can be individuals and organisation who may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views:

- Stakeholders: any person, group or organisation with a vested interest in the outcome of a project; and
- Key stakeholders: any stakeholders with significant influence on or significantly impacted by, the work and where these interests and influences must be recognised if the project is to be successful.

Stakeholders can be grouped into the following categories:

- International, such as the EBRD.
- Government (e.g. Bulgarian state, regional and local regulatory bodies and municipalities).
- Advisory non-government organisations.
- Services / suppliers.
- Clients, which would include public transportation users.
- Education and training institutions (e.g. universities, colleges, think tanks, etc.).
- Industrial sector (e.g. trade bodies, manufacturers).
- Internal stakeholders (e.g. employees, trade unions).
- General communities (e.g. nearby residents, local community groups).
- Public groups (e.g. nearby hospitals, local schools).
- The media.

If stakeholders are not on the list below and would like to be kept informed about the project, contact should be made with Mr. Orlin Prandjev, Head of Innovative Projects Department (contact details provided on the front cover) who has responsibilities for stakeholder communications.

Key stakeholders identified during the development of this plan

The project stakeholders identified at this stage are presented in Table 1 below.

Table 1: Key Stakeholders

Stakeholder Group	Key Stakeholders	Summary of Specific Interest
International	→ EBRD – London HQ <i>One Exchange Square, London EC2A 2JN, United Kingdom, Switchboard: +44 20 7338 6000</i>	<i>EBRD Environmental and Social Policy, including EHSS best practice, Environment and Social Impact Assessment and Environmental and Social Action Planning</i>
	→ EBRD – Bulgaria office <i>Sofia Resident Office, 17 Moskovska Street, 1000 Sofia, Bulgaria, Tel : +359 2 9321 414</i>	<i>Funded projects for promotion of sustainable transport</i>
Regulatory bodies	→ Regional Inspectorates of Environment and Waters (RIEW)- Sofia	<i>Design decisions – determination of the applicable procedure, for example a need for the Environmental Impact Assessment (EIA), or determination of conditions and/or mitigation measures which have to be met by SETC during the construction works and exploitation</i>
	→ National Labour Inspectorate	<i>Any changes to working conditions for SETC staff, including drivers</i>
Local Communities and Public Groups	→ City of Sofia	<i>Changes to the services and facilities, including pricing</i>
	→ First response Emergency Services	<i>Awareness of the high voltage electrical risks and chemical risks associated with electric buses and mitigation strategies</i>
	→ Passengers on all services, including female users and disabled users of the services	<i>Engagement on development (including bus and tram design decisions)</i>
	→ Residents adjacent to the project facilities, including depot(s)	<i>Environmental and other local community benefits and impacts</i>
	→ Female users of the services	
	→ Disabled users of the services	
Operational Suppliers, Services	Contractors for supply of equipment including:	<i>Supply needs / changes</i>
	→ Vehicle suppliers	<i>EHSS requirements and standards</i>
	→ Maintenance and service providers, including equipment suppliers	

Stakeholder Group	Key Stakeholders	Summary of Specific Interest
Internal Stakeholders	→ Employees, especially those of SETC involved in the project	<i>Any changes to responsibilities or procedures and associated training</i>
	→ Trade unions	<i>Labour safety</i>
Media	→ Local newspapers	<i>Development and procurement plans</i>
	→ Local radio	<i>Economic and local community benefits and impacts</i>

5. SETC Stakeholder Relations and Approach

Overview of existing stakeholder and community relations

SETC has established channels of communication with stakeholders in place, and information on SETC activities can be found:

- On their website (www.elektrotransportsf.com)
- On Sofia Municipality website (www.sofia.bg)
- On Facebook - <https://www.facebook.com/sofiaelectrotransport/>

The SETC website contains information on the routes and schedules (via a link, as the schedules are developed and maintained by Sofia Municipality) and provides details of the offices where monthly travel cards can be purchased and provides contact details of senior management and all of the depots. End of year financial reports are published on the SETC website as well as information regarding training opportunities to gain a trolley or a tram driver's qualification. Information for contractors, for example, Internal rules for awarding public contracts can also be found on the website.

The city (Sofia Municipality) effectively supports SETC in communications with the public, by disclosing information on their website, which has a dedicated section on transport. It provides information on routes, schedules, tariffs, publishes news and enables the users to submit a comment or complaint.

Information about the Investment Programme is available on the company website:

http://www.elektrotransportsf.com/index.php?option=com_content&view=category&layout=blog&id=56&Itemid=88&lang=bg

http://www.elektrotransportsf.com/images/obshtestveni/2017/reshenie_sos_313_investi_programa_se_080617.pdf

For the project will be used existing formal grievance mechanism for public communications of SETC and Sofia Municipality, as described in Section 7.

Summary of the methods of future engagement activities

Stakeholder engagement activities will be recorded, with the following information, on an ongoing basis:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, newspapers etc.), and how it was released or distributed.
- The locations and dates of any meetings undertaken.
- Individuals, groups, and / or organisations that have been consulted.
- Key issues discussed and key concerns raised.
- Response to issues raised, including any commitments or follow-up actions.
- Process undertaken for documenting these activities and reporting back to stakeholders.

6. Stakeholder engagement programme

Disclosure of information

The types of information disclosed and the specific method of communication to be undertaken by SETC for this project are summarised in the Stakeholder Engagement Programme in **Table 2** below. The objectives of external communications are to provide engagement to targeted audiences with regard to the investment plans, associated activities, and their implementation.

The future programme

Sources for the communication of information will be presented at key locations; these will include information presented on notice boards in the depots and other local community locations as required.

SETC will collate any comments and feedback associated with the project and will document these.

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.

The future programme of engagement is presented in **Table 2** below which will be reviewed and updated on an on-going basis.

Table 2: Stakeholder Engagement Programme

Activity	Type of Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups Consulted
Annual Reporting to Investors	Annual reports regarding the environmental and social performance of the project against requirements, including implementation of Stakeholder Engagement Plan and resolution of any grievances associated with the project.	One year after loan signing agreement / reports provided annually comprising: → ESAP status → Resolution on grievances	Disclosure to EBRD
Engagement with Regulatory Agencies	→ Formal notification about the Investment → Any changes to working conditions for SETC staff, including drivers	→ Meetings or calls with agencies –as required. Meetings will be minuted.	→ Regional Inspectorates of Environment and Waters (RIEW)-Sofia → National Labour Inspectorate
Engagement with the Local Community	SETC development plans and news: → Project development schedule → Changes to the service / facilities → Job opportunities → Bus design decisions and rationale → Promotion of the benefits of the extended service to promote passenger usage → Any changes to nuisance / environmental issues at or near the depots, in particular, and mitigation measures → Grievance mechanism →	→ Company website → Informative announcements and press statements in local papers and radio following any key milestones / decisions → Distribution of information at tram and bus stations and on depot notice boards → Specific meetings with individual parties should project planning identify any potential impacts on specific people such as neighbours of the depots (note: no impacts expected at this time) →	→ City of Sofia → Public, including passengers on all services → Residents and commercial properties adjacent to the project facilities, including depots → Media

Activity	Type of Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups Consulted
Regular engagement with any parties more specifically affected by the project	Targeted communication with potentially vulnerable groups.	<ul style="list-style-type: none"> → Letters to affected parties, in-person meetings, workshops etc. (when required) → 	<ul style="list-style-type: none"> → Communities, including specific demographic groups within those communities as appropriate → Public Groups → Government, including internal employees
Engagement with Internal Stakeholders on Project Details	<ul style="list-style-type: none"> → Any changes to responsibilities or procedures and associated training, including any particular provisions for labour safety → Employee and public grievance mechanism 	<ul style="list-style-type: none"> → Collective and individual meetings with staff and trade unions representatives as appropriate, accompanied by written confirmation of changes → Notice boards at the depots 	<ul style="list-style-type: none"> → Employees, especially those of SETC involved in the project → Trade unions
Appointment of vehicle and equipment suppliers and other operational service providers	<ul style="list-style-type: none"> → Supply needs / changes including job opportunities → Tender documents for suppliers, including selection criteria → EHSS requirements and standards → Award of contract 	<ul style="list-style-type: none"> → Advertisements in press, trade journals → Announcement in the local newspaper and on local radio → Internal communications 	<ul style="list-style-type: none"> → Contractors / suppliers for <ul style="list-style-type: none"> ■ Vehicle supply ■ Other equipment supply ■ Maintenance and service provision → Internal employees → Media

7. Reporting and grievances

Monitoring, reporting and feedback mechanisms

Through communication channels such as local media, one-to-one meetings, and other community feedback, SETC will monitor and provide response as appropriate. Should future important public consultation meetings or public exhibitions be arranged at venues to enable stakeholders to participate, an open book (with pens provided) will be positioned in a suitable location for recording comments anonymously. 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 information will be recorded by SETC so that feedback can be provided to stakeholders.

Grievance mechanism

For the project will be used existing formal grievance mechanism for public communications of SETC and Sofia Municipality. A grievance mechanism will be used as required to handle grievances from employees, contractors and external stakeholders. The assessment of grievances will be carried out in accordance with Bulgarian Law and responses will be provided within one month of the grievance being lodged.

The grievance mechanism will be according the common grievance politic of SECT and Sofia Municipality, as follows:

- Grievance received;
- Grievance recorded in a register (record keeping) system of SETC;
- For an immediate action to satisfy the complaint, the complainant will be informed of corrective action;
- Implement corrective action, record the date and close case;
- For a long corrective action, the complainant will be informed of proposed action within 30 days of receiving the grievance; and
- Implement corrective action, record the date and close case.
- In all cases, the grievance will be acknowledged within 14 days, and either the corrective action taken, or the plan for corrective action provided, within 30 days.

A grievance should be recorded by the complainant using the existing grievance systems of Sofia Municipality (online contact center or on shelter) or record keeping system of SETC.

Roles and Responsibilities

Ms. Madlen Yordanova – Public Relations Specialist in SETC 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 company for a response.