

Stakeholder Engagement Plan (SEP)

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Environmental and Social Due Diligence: KOSTT Transmission Grid
Strengthening Project



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Acronyms and Abbreviations

E&S	Environmental and Social
EBRD	European Bank for Regional Development
EIA	Environmental Impact Assessment
ERO	Kosovo Energy Regulatory Office
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
EU	European Union
GRM	Grievance Recourse Mechanism
KEDS	Kosovo Electricity Distribution and Supply Company
KEPA	Kosovo Environmental Protection Agency
KOSTT	Kosovo Transmission, System and Market Operator
ME	Ministry of Economy
MESPI	Ministry of Environment, Spatial Planning, and Infrastructure
MIET	Ministry of Industry, Entrepreneurship, and Trade
NTS	Non-technical Summary
PR	Performance Requirement
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan



1. Introduction and Project Description

1.1 Project Description

This Stakeholder Engagement Plan (SEP) outlines activities for the KOSTT Transmission Grid Strengthening Project, an EBRD-financed initiative to enhance the reliability, efficiency, and capacity of Kosovo's electricity transmission system. The project supports integration of up to 300 MW of renewable energy and aligns with ENTSO-E standards. With a total cost of €23.25 million, including €22.5 million from EBRD, the project is implemented by KOSTT, Kosovo's Transmission, System, and Market Operator, fully owned by the Republic of Kosovo.

KOSTT is responsible for electricity transmission, power system balancing, and market operations. The project includes:

- Rehabilitation of 110/10kV substations in Klina and Burim
- Revitalization of high-voltage equipment in Vushtrri and Vallaq
- Upgrades to the 110kV line and construction of a new single-circuit line in Prizren
- Transformer replacements in Gjilan and Vitia
- Installation of a second transformer in Gjilan 5
- Replacement of outdated transformers in Gjakova 1 & 2, Gjilan 1, Vitia, Prishtina 1, Vushtrri 1, Skenderaj, and Prizren 3
- Upgrades to Prizren 1–3 transmission lines to improve capacity and meet N-1 standards
- Revitalization of substation equipment in Vallaq and Vushtrri 1

These investments aim to reduce outages, improve grid resilience, and support economic growth. The project is being implemented under the EBRD's 2019 Environmental and Social Policy, specifically adhering to Performance Requirement 10 (PR10) on Information Disclosure and Stakeholder Engagement. This requires meaningful, inclusive, and culturally appropriate stakeholder consultation throughout the project lifecycle.

1.2 Brief Summary of Project Impacts and Risks

The KOSTT Transmission Development Project is classified as Category "B" under the EBRD Environmental and Social Policy (2019), meaning its potential environmental and social impacts are site-specific and manageable through appropriate mitigation. The scope of appraisal is determined on a case-by-case basis.

Key risks are associated with civil works for the rehabilitation and modernization of substations, transmission lines, and transformers. While the long-term impact is expected to be highly positive through enhancing energy reliability, supporting renewable energy integration, and boosting regional development, several short-term risks have been identified.

Environmental risks include air and noise pollution, waste generation, and soil erosion during construction, particularly with heavy equipment use. The handling of hazardous materials, such as transformer oil and SF6-containing equipment, poses contamination risks if not properly managed. Though significant biodiversity impacts are not expected, minor disruptions to ecosystems and avifauna may occur. Infrastructure resilience to extreme weather will also be essential.

Social risks relate to occupational safety and health, community exposure to construction-related hazards, and possible temporary land access or use restrictions. While large-scale land acquisition is not anticipated, the Project may involve limited, temporary land acquisition and minor economic displacement. Effective communication and stakeholder engagement will be key to minimizing community impacts and resolving grievances.

The SEA/SH risk is considered low due to limited-scale civil works and the use of local labor. Nonetheless, awareness campaigns, community outreach, and a robust Grievance Redress Mechanism (GRM) will help mitigate this risk.

Risk management will be guided by an Environmental and Social Action Plan (ESAP), the Stakeholder Engagement Plan (SEP), and a Non-Technical Summary (NTS), supported by targeted communication, capacity building, and site-specific Environmental and Social Management Plans (ESMPs). Overall, risks are localized and controllable, with mitigation aligned to EBRD's Environmental and Social Performance Requirements.



2. Objective/Description of the SEP

2.1 Methodology

The overall objective of this SEP is to establish a structured stakeholder engagement program, including information disclosure and consultations throughout the project cycle. It defines how the project team will communicate with stakeholders and provides a mechanism for raising concerns, submitting feedback, or lodging complaints related to project activities.

To align with best practices, the project will apply the following principles:

- *Openness and Life-Cycle Approach*: Public consultations will be held throughout the project, conducted openly and free from manipulation, interference, or coercion.
- *Informed Participation and Feedback*: Stakeholders will receive timely, accessible information and opportunities to provide feedback, which will be reviewed and addressed.
- *Inclusiveness and Sensitivity*: The engagement process will be inclusive, ensuring equal access to information. Particular attention will be paid to vulnerable groups (e.g., women, elderly, persons with disabilities, displaced persons, migrants, and ethnic minorities), using culturally sensitive approaches.
- *Flexibility*: Engagement methods will be adapted as needed, including the use of online or phone-based formats when in-person interaction is limited due to social, cultural, or safety considerations.

The implementing agencies will ensure meaningful consultation, in line with EBRD Performance Requirement 10 (PR10), which emphasizes two-way, inclusive, and ongoing engagement. Key features include:

- Early consultations to inform project design;
- Continuous engagement as risks and impacts evolve;
- Timely disclosure of clear, relevant, and accessible information in appropriate languages and formats;
- Responsiveness to feedback;
- Protection against coercion or discrimination;
- Documentation and public disclosure of the consultation process

3. Legal and Regulatory Framework for Stakeholder Engagement

National Legal framework for Stakeholder Engagement and EBRD Policies on Stakeholder Engagement are presented in Annex 1 of this report.

4. Stakeholder Identification and Analysis

Project stakeholders are defined as individuals, groups or other entities who:

- I. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
- II. may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

More specifically, EBRD's PR10 recognizes three broad categories of stakeholders:

- **Project Affected Parties**: These are individuals or groups likely to experience actual or potential negative or positive impacts on their physical environment, health, security, cultural practices, well-being, or livelihoods due to the Project. This category includes local communities and those most likely to notice changes from the Project's environmental and social impacts.
- **Other Interested Parties (OIPs)**: OIPs are individuals, groups, or organizations with an interest in the Project, often due to its location, characteristics, impacts, or matters related to public interest. Examples include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society groups, and cultural organizations.



- **Disadvantaged/Vulnerable Individuals or Groups:** It's crucial to assess whether the Project impacts disproportionately affect disadvantaged or vulnerable individuals or groups who may lack a voice to express their concerns or understand the Project's impacts, especially in the context of this Project.

4.1 Project Affected Parties

These include individuals, groups, or communities directly or indirectly affected by project activities:

Table 1 Project Affected Parties

Stakeholder	Description / Examples	Potential Impact / Interest
Local Communities / Residents	Klina, Burim, Prizren, Gjilan, Vitia, Vushtrri, Vallaq, Gjakova, Skenderaj	Construction-related noise, dust, access disruption; long-term energy benefits
Construction Workers	Deployed across all project sites	Occupational health and safety risks
Farmers / Agricultural Producers	Near substations or line routes (e.g., Prizren, Gjakova, Skenderaj)	Temporary loss of access or land-use restrictions
Landowners / Land Users	Properties impacted by construction, easements, or infrastructure	Temporary or permanent property impacts
Households Near Infrastructure	Families adjacent to substations or lines	Visual disturbance, noise, vibrations
Energy Consumers	Households, businesses, industrial users across Kosovo	Improved energy reliability and reduced outages

4.2 Other Interested Parties

These are individuals, groups, or organizations with an interest in the project due to its location, relevance, or proximity, though not directly affected. For the Kosovo Financial Sector Development Project, they include

Table 2 Other Interested Parties

Stakeholder	Description / Examples	Potential Impact / Interest
Government Agencies	ME, MESPI, ERO, KEPA, Emergency Management Agency, Municipal Centre for Cultural Heritage, Local municipalities	Policy oversight, permitting, coordination
Private Sector Entities	KEDS, contractors, suppliers, energy companies	Service disruptions, infrastructure supply, coordination
Academic / Research Institutions	Universities, think tanks	Technical analysis, monitoring
Civil Society Organizations	NGOs on environment or community support	Advocacy, social/environmental compliance
International Stakeholders	EU, donors, Chamber of Commerce, media	Oversight, public awareness, regional integration
Adjacent Residents	Nearby municipalities	Indirect benefits from improved services

4.3 Disadvantaged / Vulnerable Groups

These are individuals who, due to age, gender, disability, ethnicity, or economic hardship, may face barriers to project participation. The project will promote their inclusion through targeted outreach, accessible materials, and culturally appropriate methods in Albanian, English, and Serbian.

Table 3 Disadvantaged / Vulnerable Groups



Stakeholder	Description / Examples	Potential Impact / Interest
Low-Income Households	Especially in rural areas	Higher risk from service interruptions
Women (in rural areas)	May face access/participation barriers	Need inclusive engagement methods
Ethnic Minorities	Roma, Ashkali, Egyptian, Serbian communities	Language/systemic barriers to engagement
Persons with Disabilities	Physical/sensory limitations	Require accessible communication and venues
Elderly / Health-Sensitive	Seniors, individuals with health conditions	More vulnerable to construction-related impacts
Schoolchildren / Schools	Near project infrastructure	Require safety measures during construction

4.4 Tailored Stakeholder Engagement Measures (disadvantaged / vulnerable individuals or groups)

Table 4: Tailored Stakeholder Engagement Measures (disadvantaged/vulnerable individuals or groups)

Stakeholder group	Limitations to Engagement	Measures/Resources to Facilitate Engagement
Low-Income and economically disadvantaged households in affected areas	- Limited awareness about the project - May lack of access to technology for digital consultations - Financial and time constraints to attend public meetings	- Organize local, in-person consultation sessions in accessible locations - Printed communication materials distributed at highly-frequented facilities in villages/rural areas including municipal buildings, post offices, stores, schools, etc.
Women (particularly in rural areas)	- As a result of gender-based discriminatory norms, may feel that their engagement is not important or necessary - May feel uncomfortable attending public events and/or sharing their views and concerns in front of men - Family responsibilities may make it difficult to participate in events that are far from their homes or that are scheduled at a certain time	- If necessary, separate, women-only consultations (such as women-only focus groups) will be organized - Locations of public consultations are close to the homes of those whose engagement is sought - Timings of consultations try not to interfere with household/family obligations - Ensure dissemination of Project information through multiple channels including radio, social media, word of mouth, including audio-visual materials for those who cannot read and write
Ethnic minorities	- May feel unwelcome to attend events (fear of discrimination and or potential social conflict) - May feel underrepresented due to language barriers	- Ensure that all disclosed information is available in the official languages of Kosovo (i.e. Albanian, Serbian) and English. - Where necessary, provide translations or interpretation for other minority languages (e.g., Turkish, Bosnian, Romani) to facilitate meaningful participation. - Collaborate with local NGOs and/or community leaders to facilitate their engagement and ensure their participation and ask for support in organizing inclusive events.
Persons with disabilities	- Physical barriers to attending events (e.g., inaccessible venues) - Difficulty accessing digital platforms (e.g., vision or hearing impairments) - Lack of specific outreach and targeted support	- Ensure venues are wheelchair accessible and equipped with necessary accommodations for participants with disabilities (e.g., ramps, elevators, accessible toilets) - Provide sign language interpreters, assistive technology, and materials in accessible formats (e.g., braille, audio) if required.



		• Offer remote or digital participation options for those who cannot attend in person, ensuring accessibility (e.g., captioning, screen reader compatibility)
Elderly and health-sensitive individuals	• Physical inability to attend consultations • Higher sensitivity to construction impacts such as noise and dust - Provide at-home consultation options (e.g., phone or small group visits)	Share information in simple, non-technical language through trusted intermediaries, such as local healthcare workers or community leaders and company's community representative such as CLO where such need is identified.
Schoolchildren (going to any schools nearby project sites)	• Safety risks due to proximity to construction activities • Disruptions to school operations and routines - Implement strict safety protocols near schools, including fencing off construction areas	• Schedule construction activities to minimize disruptions to school hours • Engage with school administrators to communicate timelines and safety measures



5. Stakeholder Engagement Program

5.1 Purpose and Timing of Stakeholder Engagement Program

The goal of this stakeholder engagement program is to ensure open, inclusive, and transparent communication with all stakeholders throughout the Project cycle. Specific objectives include:

- Maintain constructive dialogue with affected communities and interested parties.
- Identify and engage stakeholders early and continuously.
- Integrate stakeholder feedback into Project design and implementation.
- Ensure meaningful participation based on principles of transparency and non-discrimination.
- Provide equal opportunities for marginalized groups to express views and concerns.
- Ensure timely and accessible information disclosure.
- Manage expectations and address misconceptions.
- Communicate in locally appropriate formats and adapt based on feedback.
- Define timelines and methods for information sharing and consultation.
- Promote understanding of environmental and social risks and mitigation measures.
- Establish and maintain a Grievance Mechanism.
- Monitor and document SEP activities and responsibilities.
- Provide regular updates to stakeholders and Project management.

Stakeholders will be kept informed of Project goals, activities, environmental and social mitigation measures and grievance mechanisms will be shared regularly as per the Information Dissemination Strategy. The frequency and format of engagement will reflect the Project's phase and stakeholder needs. The Abbreviated Land Acquisition Plan will be disclosed to stakeholders prior to any offers of compensation for impacts to land.

Public meetings and engagement opportunities will be communicated through various channels, including email, websites, notice boards, and local media. This approach ensures inclusive and proactive participation.

This SEP is a living document and will be updated as the Project evolves.

5.2 Project Stakeholder Needs Summary with Information Disclosure and Stakeholder Engagement Methods, Tools and Techniques

Different engagement methods are proposed and cover different stakeholder needs as stated below:

Table 5: Project Stakeholder Needs (Summary)

Stakeholder group	Language needs	Preferred information disclosure and communication means / method	Specific needs (accessibility, large print, childcare, daytime meetings, etc.)
Government agencies (e.g. MESPI, municipalities, etc.)	Official languages (primarily Albanian and Serbian)	• Official letters • Meetings with ministries, municipalities, and other governmental institutions • Emails • Reports • Website publications/news	• Coordination meetings during standard working hours • Access to technical documentation • Regular updates on progress and policy changes



Local communities/residents within or nearby project sites	Albanian (and Serbian, as applicable)	• Community meetings • Flyers/posters • Local government announcements • Media (radio/TV) • Online platforms	• Accessibility accommodations (e.g., large print materials) • Timing of meetings to suit workday schedules • Scheduling meetings and events at times that are convenient for working community members and for parents/mothers to attend
Landowners and land users	Albanian, Serbian	• Direct meetings • Letters/emails • Notices through municipal offices	• Transparent land acquisition processes in line with national legislation and EBRD PR5, whichever is more stringent. • Compensation guidelines in accessible formats
Construction workers	Albanian (and Serbian, as applicable)	• Workplace notices • Meetings • Email updates • Code of Conduct • Contract	• Training on occupational health and safety • Access to personal protective equipment (PPE) • Regular site safety inspections • Understanding CoC and GRM
Agricultural producers/farmers	Albanian and Serbian	• Public consultation meetings • Letters/emails • Notices through municipal offices • Posters • TV/radio ads • Social media	• Land access plans during construction • Land restrictions during construction • Advance notice of potential disruptions
Private sector entities (businesses, business associations)	Official languages	• Official letters • Emails • Roundtables • Meetings	• Tailored information on project benefits and potential impacts on businesses • Transparent procurement and contracting processes
KEDS (Kosovo Electricity Distribution and Supply Company)	Albanian	• Official communications • Coordination meetings • Email updates • Progress reports	• Early notification of planned outages • Detailed schedules for construction and repairs • Mechanisms for promptly informing consumers
Energy consumers	Official languages	• Media (TV/radio/social media) • Official website updates • SMS/email notifications	• Advance communication on outages • Simplified guides to benefits of the project
Civil Society Organizations (CSOs)	Albanian, Serbian	• Public consultations • Workshops • Reports • Social media	• Accessible venues • Inclusion in decision-making meetings • Information in simplified formats for non-technical audiences Collaborative platforms for feedback



Media	Albanian, Serbian	• Press releases • Press conferences • Email	• Regular, simplified updates on the project • Availability of spokespersons for interviews
International donors and organizations (e.g. the EU)	English	• Official reports • Emails • Conferences	• High-level progress summaries • Regular financial impact updates

5.3 Strategy for Information Disclosure and Consultation

Throughout the Project's life cycle, the Project's implementing agency (KOSTT) will timely disclose information on the Project objectives, components, planned activities, risks, impacts, grievance mechanisms, public consultations, Project progress, and other processes to targeted stakeholders as described in the table in Annex 2. All stakeholders will be provided access to reliable, meaningful, and complete Project information presented in a manner that is considerate of specific local conditions, and cultural, and language preferences of local communities. This may mean that information will be required in different formats to meet the needs of various audiences.

The information disclosure and stakeholder consultation plan presented in Annex is tailored in terms of the needs of each identified stakeholder group.

The exact strategy for engagement, and details on the timing and location/venue of public meetings, will be decided once the design of the different Project components is finalized, and will be included in the updated SEP. The stakeholder engagement plan will be updated regularly as the Project evolves.

Proposed Strategy for Information Disclosure and Consultation is presented in Annex 2.

5.4 Proposed Strategy to Incorporate the Views of Vulnerable Groups

KOSTT is committed to ensuring the meaningful participation of disadvantaged and vulnerable individuals and groups—such as women, persons with disabilities, Roma communities, and youth—throughout the consultation process. A range of tailored measures will be implemented to remove barriers and ensure inclusive engagement.

These include:

- **Diverse Engagement Methods:** Utilizing targeted formats such as focus groups, separate sessions, online platforms, and written submissions.
- **Accessibility:** Ensuring venues are accessible, providing sign language interpretation, simplified materials, and support for transport or childcare. Women-only and youth-friendly formats will be used where appropriate.
- **Cultural Sensitivity:** Adopting gender-sensitive and culturally appropriate approaches to foster safe and inclusive dialogue.
- **Capacity Building:** Providing training and awareness sessions to empower meaningful participation, especially for women and youth.
- **Inclusive Grievance Mechanisms:** Making complaint mechanisms accessible, gender-responsive, and youth-friendly.
- **Equitable Benefit Access:** Designing measures to ensure that vulnerable groups can fully benefit from the project.

Through these efforts, the project aims to ensure that the voices of vulnerable groups are actively integrated into decision-making and implementation.



6. Review of Comments / Reporting Back to Stakeholders

KOSTT will ensure stakeholders are regularly informed of project progress, including environmental and social performance, SEP implementation, and the Grievance Mechanism (GRM). Feedback collected through various channels—such as meetings, submissions, consultations, surveys, and the GRM—will be systematically reviewed and integrated into decision-making alongside technical and regulatory considerations.

The project is committed to closing the feedback loop by reporting how stakeholder input influenced final decisions. These summaries will form part of the semiannual SEP implementation report, shared with the EBRD and published on the KOSTT/project website to ensure transparency and accountability.

7. Resources and Responsibilities for Implementing Stakeholder Engagement

7.1 Resources

As the project is in the early appraisal phase, a stakeholder engagement budget has not yet been finalized. A detailed budget will be included in the updated SEP, to be prepared and disclosed before project effectiveness, ensuring all parties are informed and engaged throughout the project lifecycle. Below is a tentative outline of budget categories for planned engagement activities.

Table 6: Tentative budget categories for effective implementation of engagement activities

Budget categories	
1. Staff salaries and related expenses	4. Trainings
1a. Experts/staff to be hired under this project	4a. Training on social/environmental issues for KOSTT/project staff and contracted staff, as applicable and needed
1b. E.g. Travel costs for staff	
2. Events	5. Beneficiary surveys
2a. Project launch meetings	5a. perception survey
2b. Organization of focus groups	6. Grievance Mechanism
2c. Conducting surveys	6a. Training of KOSTT staff on GRM management
3. Communication campaigns	6b. Constitution of local admission points
3a. Posters, flyers	6c. GRM communication materials
3b. Social media campaigns	7. Other expenses
3c. Workshops	7a. Travel, accommodation etc.

7.2 Management Functions and Responsibilities

The Project will be implemented by KOSTT, which will also manage the execution of the Stakeholder Engagement Plan (SEP) and facilitate communication with stakeholders. Staffing decisions, including the appointment of environmental and social experts, are still pending.

KOSTT will assign a dedicated individual, such as a social expert, to lead stakeholder engagement. This role includes managing communications, organizing consultations, addressing inquiries, overseeing the Grievance Redress Mechanism



(GRM), and ensuring stakeholder input informs decision-making, demonstrating KOSTT's commitment to inclusive engagement.

Key responsibilities of the engagement focal point include:

- Designing and executing stakeholder engagement strategies aligned with project goals;
- Ensuring inclusive, transparent communication and feedback mechanisms;
- Organizing consultations, forums, and information sessions;
- Managing digital platforms and public updates;
- Monitoring engagement effectiveness and proposing improvements;
- Supporting Project teams and acting as a liaison with external stakeholders.

All contractors engaged in Project activities will be required to follow SEP provisions. Grievance management requirements will be included in tender documents and contractual obligations

8. Grievance Redress Mechanism (GRM)

KOSTT will establish and manage an accessible and transparent GRM to address and resolve concerns related to the Project, including environmental and social impacts. The mechanism will be cost-free, culturally appropriate, and available to all Project-affected persons and organizations, without fear of retaliation.

The GRM will support multiple input channels, enabling prompt and effective resolution. It will also include protocols to receive and refer gender-based violence (GBV) complaints confidentially and safely to appropriate service providers.

The GRM focal point (Social Expert) will oversee grievance intake, documentation, and coordination. This role requires relevant qualifications or training to ensure effective management.

Grievances may be submitted via:

- Phone, SMS, or email
- KOSTT's website (including via grievance form – Annex 1)
- Social media (e.g. Facebook, Instagram)
- Manual submission of grievance forms

The grievance form will be available in Albanian, Serbian, and English, and published online and through affected municipalities.

All grievances will be treated confidentially and respectfully. Complainants may request anonymity; however, anonymous grievances will not receive individual feedback. All grievances, including anonymous ones, will be recorded and included in the company's overall Environmental & Social (E&S) reporting to the EBRD, which occurs on an annual basis. Serious incidents and accidents will be reported promptly, outside of the regular reporting cycle, to ensure timely action and compliance with EBRD requirements.

GRM contact details will be shared publicly via websites, printed materials, and grievance forms.

Contact Information for Submitting Grievances and Inquiries

Name and Position: Minivere Idrizi

Address: KOSTT: Str. Isa Boletini. Nr. 39, 10000 Prishtina, Kosovo

E-mail: minivere.idrizi@kostt.com

Telephone: + 383 (0)38 501 301 049



The KOSTT website will provide clear instructions for stakeholders on submitting feedback, questions, concerns, and grievances. It will also explain how the Grievance Recourse Mechanism (GRM) works, including steps and timelines.

Workers' GRM

The Project will maintain a separate grievance mechanism for direct and contracted workers to raise workplace concerns. This worker GRM is distinct from the community GRM and is managed by KOSTT and each employer. Workers will be informed of the worker GRM upon recruitment, including protections against retaliation. Employment-related grievances will be logged, reviewed, and addressed transparently and fairly.

KOSTT will ensure that the worker GRM procedure is in place prior to Project Effectiveness and reflected in workers' contracts. KOSTT will oversee implementation of the worker GRM by all contractors and subcontractors. Where contractors do not have an established worker GRM, KOSTT will either extend its own worker GRM to those contractors or require contractors to implement a worker GRM aligned with KOSTT's standards.

8.1 GRM Management

The grievance resolution process follows structured steps, aligned with the GRM flowchart and timelines. The GRM is designed to identify solutions and provide remedies at the source in a timely and effective manner. It is important to note that the GRM does not provide legal advice; offering legal guidance to external stakeholders could lead to misunderstandings or unintentionally trigger new complaints. Stakeholders using the GRM are not restricted from accessing other grievance mechanisms or pursuing legal avenues available under national law. The GRM's focus is on resolving complaints efficiently before they escalate into formal legal cases, while allowing individuals the freedom to choose whichever mechanism they prefer.

The grievance resolution process includes the following structured steps, aligned with the GRM flowchart and timelines:

Step 1: Acknowledgement and Registration: Grievances received via designated channels are reviewed and acknowledged by KOSTT within 5 calendar days. Complainants are notified in writing, and the responsible contact person is identified (unless submitted anonymously). Each case is logged and assigned a unique ID in the grievance registry.

Step 2: Screening and Evaluation: KOSTT assesses whether the grievance falls within its mandate and if the complainant has valid standing. Grievances are categorized by risk level (high, medium, or low) and relevance to Project activities. If a grievance is deemed unrelated, a formal response is provided within 5 days of acknowledgment.

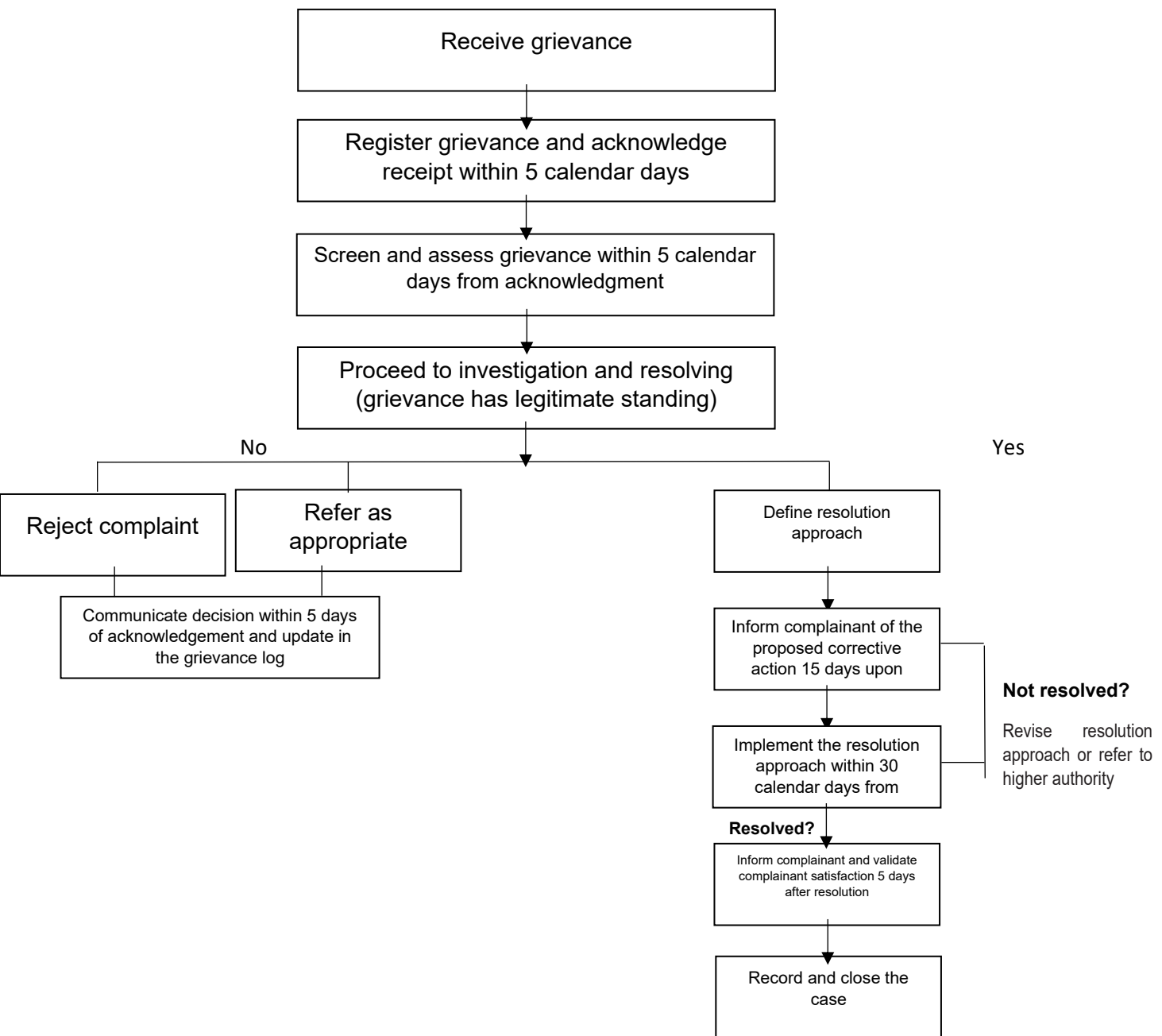
Step 3: Investigation: A detailed investigation follows, including further information gathering if necessary. If the complaint lacks clarity and the complainant does not respond to requests for clarification, KOSTT issues a formal conclusion explaining why the grievance cannot proceed.

Step 4: Resolution: KOSTT takes appropriate corrective measures to resolve the issue. If long-term actions are needed, the complainant is informed within 15 calendar days. All grievances should be resolved within 30 calendar days. A written conclusion is shared with the complainant and relevant parties. If resolution isn't possible, a justification and next steps are provided.

Step 5: Follow-up: KOSTT conducts follow-up within 5 business days of resolution to confirm implementation and ensure the complainant is informed. If unsatisfied, the complainant retains the right to pursue legal remedies under national law and is informed of relevant appeal options.



Figure 1: GRM Flowchart





8.2 GRM Monitoring and Reporting

KOSTT will ensure all received grievances are properly logged in a designated complaints log or database (see Annex 2 for a sample template). This log records and tracks issues raised by individuals or groups and will include:

1. Reference/registration number
2. Date and method of receipt
3. Grievance description
4. Relevant sub-project or activity
5. Complainant status (e.g., project-affected person, community member)
6. Gender and ethnicity (if available)
7. Acknowledgment date
8. Actions taken (e.g., investigation, resolution)
9. Resolution date and feedback provided

The GRM focal point will compile grievance data, inquiries, and comments into biannual reports submitted to the EBRD and published on the KOSTT/Project website to promote transparency.

Key monitoring indicators may include:

- Total grievances received
- Percentage resolved
- Resolution time by category
- Timeliness of redress
- Complainant satisfaction
- Public access to GRM

To ensure effectiveness, the GRM will undergo regular audits.

9. Monitoring and Reporting

KOSTT is responsible for monitoring the implementation of Project stakeholder engagement activities. The designated focal points, typically the social experts, will oversee these activities across all components and operations. Their role includes executing the SEP, tracking activities, gathering feedback, evaluating effectiveness, and making improvements to ensure continuous engagement throughout the Project lifecycle. Key responsibilities include:

- **Plan Oversight:** Manage implementation of the SEP, ensuring activities align with its strategies and objectives.
- **Activity Tracking:** Monitor stakeholder engagement actions such as consultations, meetings, and feedback collection to ensure timely delivery.
- **Feedback Compilation:** Collect and document stakeholder input, reflecting diverse concerns and perspectives.
- **Effectiveness Evaluation:** Assess whether engagement activities are achieving intended outcomes and fostering positive stakeholder relations.
- **Plan Adjustments:** Make improvements based on monitoring results to ensure the SEP remains relevant and responsive.
- **Communication Management:** Ensure clear, timely communication between the Project and stakeholders and address feedback appropriately.
- **Reporting:** Produce comprehensive monitoring reports outlining engagement outcomes and areas for improvement.
- **Collaboration:** Work with Project teams and external stakeholders to integrate feedback into Project decisions.
- **Capacity Building:** Provide training for teams on engagement best practices for consistent implementation.
- **Standards Compliance:** Ensure adherence to relevant regulations and ethical standards throughout the SEP lifecycle.

KOSTT will also ensure that follow-up actions—such as sharing consultation outcomes and corrective measures—are carried out and communicated effectively to stakeholders, thereby closing the feedback loop and reinforcing accountability.



Semi-annual Stakeholder Engagement Reports will be submitted to the EBRD, detailing consultation activities, key findings, mitigation measures, and lessons learned. These will be publicly disclosed to maintain transparency and demonstrate how stakeholder feedback has informed project implementation.

10. Disclosure and Consultation

Once approved by the EBRD, the updated SEP will be disclosed on KOSTT's website in Albanian, Serbian, and English for a two-week public review, followed by a consultation. The invitation will be published via widely accessed national media to ensure broad stakeholder participation. It will include details on how to access the SEP, project information, consultation logistics, and contact information for feedback.

After consultations, Minutes of the Meeting documenting stakeholder feedback and responses will be annexed to the SEP. Attendance will be logged and, where permitted, supported by photographs. The final SEP, reflecting stakeholder input and approved by the EBRD, will remain publicly available throughout the project lifecycle.



Annex 1: Legal And Regulatory Framework For Stakeholder Engagement

Kosovo National Legal Framework for Stakeholder Engagement

The necessity for public disclosure and consultation adheres to specific provisions within pertinent national legislation:

- **The Law on Environmental Protection No. 03/L-025** mandates central, local institutions, and authorized bodies to consistently and objectively inform the public about environmental status, quality, emissions, warning measures, and potential pollution posing risks to human life and health. It ensures public involvement in decision-making processes.
- **The Law on Environmental Impact Assessment No. 08/L-181** governs the Environmental Impact Assessment (EIA) procedure, requiring authorities to conduct public hearings for Projects necessitating an EIA. The EIA Law mandates public debates on the Environmental Impact Assessment Report, with consultation outcomes considered in environmental consent decisions.
- **The Law on Expropriation of Immovable Property No. 03/L-139** in Kosovo not only governs land acquisition and resettlement but also includes detailed provisions regarding the communication and information processes during land acquisition. According to this legislation, the authority responsible for expropriation must, within 10 business days of adopting the decision to approve the expropriation application, provide all necessary documents and information to the identified property right holders. This decision is published in the Official Gazette and daily newspapers, initiating a 10-day period during which stakeholders can submit written comments to the expropriating authority. Additionally, the law mandates that the expropriating authority conduct a public hearing within 15 days in each municipality where the properties subject to expropriation are located.
- **The Administrative Instruction on information, public participation, and concerned parties in EIA procedures** outlines methods for notifying the public and facilitating their involvement throughout the EIA process.

Additionally, other relevant laws endorsing disclosure of Project information and fostering access to information, along with mechanisms for grievances and appeals, include:

- **Article 41 of the Constitution of the Republic of Kosovo** guarantees every individual's right to access public documents, with restrictions solely on private information, business secrets, and protected or classified data.
- **The Law on Access to Public Documents No.06/L-081** assures every individual, without discrimination, the right to access official documents held by public institutions, following prior application, aligned with the Constitution's Article 4 limitations.

Compliant with the Law on Spatial Planning, the public must be informed and engaged throughout the development and adoption of urban and spatial planning documents.

Moreover, Kosovo is not a signatory to the **Aarhus Convention on Access to Information, Public Participation in Decision Making, and Access to Justice in Environmental Matters**. Nonetheless, the national legislation broadly aligns with the principles of the Convention, integrating most of its tenets within the legal framework.

EBRD Policies on Stakeholder Engagement

EBRD's Performance Requirement 10 (PR10) of its Environmental and Social Policy (ESP) outlines its approach to stakeholder engagement and information disclosure. PR10 essentially outlines EBRD's commitment to transparency, information disclosure, and engaging stakeholders throughout the Project cycle. It emphasizes the importance of effective communication with stakeholders, both in terms of sharing information about Projects and actively involving them in decision-making processes.



Some key aspects typically covered in PR10 include:

- **Access to Information:** Ensuring that stakeholders have access to Project-related information, such as Project details, potential impacts, and mitigation measures.
- **Consultation and Participation:** Encouraging meaningful consultation with affected communities, local authorities, NGOs, and other relevant stakeholders. This involvement aims to gather feedback, address concerns, and integrate local knowledge into Project design and implementation.
- **Transparency in Decision-Making:** Promoting transparency in decision-making processes related to Project approval, design, and implementation. This transparency extends to disclosing how stakeholder input influences these decisions.
- **Grievance Redress Mechanisms:** Establishing mechanisms for handling grievances and complaints from affected parties. These mechanisms allow stakeholders to raise concerns and seek resolutions regarding Project-related issues.
- **Continuous Engagement:** Advocating for ongoing and effective engagement throughout the Project lifecycle. This involves keeping stakeholders informed about Project progress, milestones, and any changes that may occur.

EBRD's PR10 aims to align with international best practices and standards in stakeholder engagement and information disclosure, ensuring that the bank's Projects are conducted transparently and responsibly, taking into account the concerns and perspectives of the communities and individuals affected by these Projects. However, for the most current and detailed information regarding PR10 or any specific policy updates, it's recommended to refer directly to EBRD's official documentation or website.



Annex 2: Proposed Strategy for Information Disclosure and Consultation

Table 3: Proposed Strategy for Information Disclosure and Consultation

Topic of Consultation / Purpose	With Whom (Target Stakeholders)	Method(s) Proposed	Responsibility
Introduction to the project, including its components, key activities, timeline, location, expected risks, impacts, and benefits	All key project stakeholders, including PAPs, businesses, government agencies, municipalities, energy consumers, etc.	- Public consultations (particularly for affected individuals and businesses) - Official meetings (e.g. with key governmental ministries, agencies, municipalities.) - Meetings with business representatives (to be affected by project activities) - Website publications - Social media posts - TV and radio ads	KOSTT
Environmental and social impacts assessment and mitigation measures	Affected communities, environmental organizations and other CSOs, relevant government agencies	- Public consultations in affected municipalities with PAPs and affected businesses - Online consultations (utilization of websites, public consultation platform, other platforms as necessary) - Focus groups/roundtables - Website publications - Printed materials distribution (in affected municipalities)	KOSTT, environmental or E&S expert
Disclosure of information on the availability of GRM mechanisms: The process and means by which grievances can be raised and will be addressed.	All relevant stakeholders, general public	- Public consultation - Website publications - Social media posts - Email	KOSTT, affected municipalities
Regular updates on project status, achievements, and challenges (e.g. monitoring on implementation of quality standards by labs, monitoring on BCP enhancements, of e-tolling systems and road safety measures, etc.)	- Relevant ministries (e.g. MESPI) - Affected municipalities - Affected communities and businesses - EBRD - General public	- Coordination meetings with key governmental agencies and EBRD - Public consultations - Progress reports (for EBRD and relevant ministries) - Newsletters - Website publications - Social media posts	KOSTT
Employment opportunities and procurement processes	- Construction workers and construction companies - Job seekers - Local businesses	- KOSTT Website and social media posts - Posts on job search websites (e.g. kosovajob.com)	KOSTT (HR)



	• Chambers of commerce		
Health and safety measures during project implementation	• Project workers • Local health authorities • Emergency services	• Safety training workshops • Informational brochures • Regular safety audits • Public consultations to inform PAPs • Website and social media posts	KOSTT, Healthcare institutions
Informing stakeholders about energy cuts due to construction works	• Affected communities • Affected businesses • Public institutions	• Public announcements • Leaflet distributions • Website updates • Social media notifications • Local media (TV, radio) • SMS alerts	KOSTT and KEDS



Annex 3: Brief summary of previous stakeholder engagement activities

KOSTT engages external parties through systematic information disclosure and consultation, proportionate to the nature and stage of its activities. Engagement is typically carried out through public notices, website and newsletter updates, press releases, and direct communication with affected landowners, residents, businesses, municipalities, and line ministries. Where required, non-technical project information is disclosed and public consultations are supported in line with national EIA procedures. KOSTT also maintains engagement with international stakeholders, including financiers, through regular environmental and social reporting.

For the proposed project, project-specific outreach activities up to date are summarized in the table below:

Activity	Date and Location	Participants	Key discussions and outcomes
Social media announcement	15 August 2024 / Online	KOSTT senior management; European Bank for Reconstruction and Development representative for Kosovo	Public announcement of a high-level meeting between KOSTT and the EBRD, focusing on the financing needs of Kosovo's energy sector. The announcement informed the public about the signing of a Letter of Mandate as an initial step toward potential investment in transmission infrastructure, including a proposed corporate loan and grant support. The post highlighted cooperation with EBRD and development partners, project objectives related to grid modernization, and commitment to improving energy system reliability and sustainability.



Annex 4: Grievance Form/Template

Grievance Reference number:	
Full name (optional) <i>Note: You can remain anonymous if you prefer, or request not to disclose your identity to the third parties without your consent.</i>	
Anonymity	☐ I wish to raise my grievance anonymously ☐ I request not to disclose my identity without my consent
Contact information <i>Please mark how you wish to be contacted (mail, telephone, e-mail).</i>	☐ By post - Please provide mailing address: ☐ By telephone: ☐ By e-mail:
Preferred language of communication:	☐ Albanian ☐ Serbian ☐ English (if possible)
Description of incident for grievance	What is your complaint about? ☐ Regulatory and Policy Violations ☐ Environmental and Social Impacts ☐ Public Safety and Health ☐ Misconduct (e.g., allegations of discrimination, harassment.) ☐ Operational issues ☐ Other (Please Specify)



What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Date of incident / grievance

Frequency of Grievance:

- ☐ One-time incident/grievance (date _____)
- ☐ Happened more than once (how many times? _____)
- ☐ On-going (currently experiencing problem)

What would you like to see happen?

Please return this form to:

****Contact details to be provided by KOSTT****

Signature: _____

Date: _____



Annex 5: Example of a Simple Grievance Log Template

The GRM log must be included in the bi-annual project progress reports sent to EBRD.

#	Date Grievance Received	Grievance Channel (e.g. e-mail, website, telephone, etc.)	Grievance risk classification (high, medium, low)	Summary Description	Anonymous (Yes/No)	Person/staff assigned to address grievance	Status (resolved, pending, escalated)	Date of resolution of grievance	Communication about resolution (Yes/No, Description, Date)
1									
2									
3									
4									
5									
6									