



Reconstruction of Durres-Rrogozhine Railway Line, Albania

UPDATED STAKEHOLDER ENGAGEMENT PLAN (SEP)

August 2025

**The ESIA package, including this SEP, was initially developed under the IPF8 technical assistance in October 2021 and subsequently updated by Enova in August 2025.*



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List of Abbreviations

Abbreviation	Meaning
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIB	European Investment Bank
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
HSH	Hekurudha Shqiptare
LARF	Land Acquisition and Resettlement Framework
LARP	Land Acquisition and Resettlement Plan
NTS	Non-Technical Summary
PIU	Project Implementation Unit
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
WBIF	Western Balkans Investment Framework

1 Introduction

1.1 Project Context

Project Context. The EBRD is considering providing finance to the Republic of Albania, for the **reconstruction of approx. 33 km of railway line between Durres and Rrogozhine** (the “**Project**”). The Borrower is the Republic of Albania represented by the Ministry of Finance. The Client and beneficiary of the Project is Hekurudha Shqiptare (Albanian Railways, HSH or the Company), the railway operator of the Albanian railway system. The EBRD financing will be complemented by a sovereign loan from the European Investment Bank and investment grants from the European Union. The Project will be implemented by HSH. This section is part of Pan-European Corridor VIII and spans the municipalities of Durres, Kavaje and Rrogozhine.



Figure 1-1: Durres-Rrogozhine railway section, as part of the Albanian railway network

Built between 1947 and 1950, this railway section has seen little to no maintenance over the last 25 years. The infrastructure's poor condition has resulted in numerous unmanaged crossings and low train speeds, limiting service to just one passenger train per weekend between Elbasan and Durres.

The Project aims to enhance rail infrastructure, focusing on improving operational speed, reliability, and safety for both passenger and freight services.

Project Status and Available Documentation. The *Detailed Design*¹, along with the *Environmental and Social Impact Assessment (ESIA) Package*², was developed in 2021 under WBIF grant funding. Following the public disclosure process, the ESIA package (including a Stakeholder Engagement Plan) was updated in February 2022. In 2024, EBRD commissioned an independent consultant to update the environmental and social analysis and

¹ This Detailed Design is a specification outlining the scope of work, which the contractor will use to develop the Main Design in accordance with Yellow FIDIC requirements.

² The ESIA package includes: Environmental and Social Impact Assessment (ESIA) Report, Environmental and Social Management Plan (ESMP), Environmental and Social Action Plan (ESAP), Stakeholder Engagement Plan (SEP), Land Acquisition and Resettlement Framework (LARF) and Non-technical Summary (NTS).

develop updated versions of the SEP, NTS, ESAP, LARF and ESMP as part of Project appraisal for potential investment.

A detailed description of the Project is provided in [Chapter 2](#) of this Report.

Project Implementation Model. The Project will be tendered on a design-and-build basis (Yellow FIDIC) to address any missing design elements, with tendering based on the available Detailed Design (see footnote 1) and requiring the Contractor to prepare the Main Design. The Company will also select a third-party Supervision Engineer via a tender procedure.

A Project Implementation Unit (PIU) for this Project will be established.

A more detailed description of the planned works is provided in the **Non-technical Summary** which is part of the Project's disclosure package together with this Stakeholder Engagement Plan.

1.2 Objectives and Scope of this Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) was developed by HSH in order to clearly communicate to all interested and affected parties 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 and 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 Albanian legislation, as well as the requirements of EBRD.

This SEP is a live document that will be periodically updated by HSH as necessary to reflect key changes in Project activities or any new developments in the Project scope.

2 Project Description

2.1 Overview of Previous Project Preparation Activities

An overview of Project preparation activities during 2020-2022 is presented below:

Table 2-1: Overview of Project preparation activities

Activity	Description
Feasibility Study	The Feasibility Study was developed in 2018.
Preliminary Design	The Preliminary Design was initially developed under the mentioned Feasibility Study in 2018 and updated in 2020-2021 as part of the project titled "Corridor VIII Rail - Detailed Design for the Rehabilitation of the Durres – Rrogozhine Section, Albania".
Detailed Design	The Detailed Design was developed in accordance with the updated Preliminary Design also during 2020-2021. This Detailed Design is a specification of the scope of work upon which the contractor will develop the Main Design according to Yellow FIDIC requirements.
ESIA package	The ESIA was conducted during 2020-2021 with a final revision in February 2022. An ESIA package was developed and included: ESIA Report, ESMP, ESAP, SEP, LARF and NTS. A set of consultations was undertaken during the ESIA development.
Local Environmental Impact Assessment (EIA) process	In 2020, the National Environmental Agency determined that the Project shall be subject to a full EIA procedure under Albanian law. No further actions have yet been undertaken.

2.2 Brief Technical Description of the Project

The reconstruction will follow the existing railway alignment, as the area is mostly flat, except for a hilly segment near Rrogozhine, where the line passes through its only tunnel. Minor shifts of up to 2 m will occur along the route, except in two sections where the shift exceeds over 2 m. The increase in the railway radius will not impact urban infrastructure. The vertical alignment will be raised by up to 50 cm to address track deformation.

The proposed works (based on the Detailed Design) include the following key components:

Table 2-2: Key technical characteristics of Project components

Project component	Description
Railway alignment (tracks)	Reconstruction of approx. 33.5 km of single track, including complete replacement of the railway superstructure (rails, sleepers and ballast bed) and excavation to a depth of 0.5 to 1 m to allow for the installation of new substructure layers (sub-ballast and natural layers).
Stations	Demolition and construction of four stations will take place at the same locations, except for the new Rrogozhina station, which will be relocated approx. 70 m to the north of its original position. Construction of a seasonal Plazh Stop (side platform) in the urban area of Shkozë.
Bridges	Complete demolition and construction of one bridge, and the rehabilitation of four bridges.
Tunnel	Widening of one tunnel (300 m in length) to meet current standards and facilitate the future electrification of the railway line.
Level crossings	Upgrade of eight authorised level crossings and construction of three new authorised level crossings. Closure of 25 unauthorised level crossings and upgrade of five unauthorised level crossings to authorised status ³ .

³ Additional trodden paths crossing the railway at multiple locations which may be used as informal pedestrian crossings were identified in 2024. Please see the Non-technical Summary (part of the disclosure package together with this SEP) for a more detailed explanation and maps.

Project component	Description
Underpasses and overpasses	Complete demolition of nine road underpasses and construction of 12 new road underpasses, and rehabilitation of two existing road underpasses.
	Construction of four new pedestrian underpasses and rehabilitation of nine pedestrian overpasses.
Fencing	Fencing of the entire railway line.
Signalling and telecommunications	Installation of updated signalling and telecommunications systems along the entire railway line.
Access roads	Improvement of the existing service roads and construction of approx. 2.4 km of new service roads, as required by the planned grouping of the level crossings.
Others	Construction of approx. 5 km of retaining walls or gabions along parallel roads.
	Rehabilitation of existing pipes and box culverts with a span of up to 1.0 m in diameter.
	Rehabilitation of the drainage canals on both sides of the railway.

Alternatives Considered. The 2018 Feasibility Study evaluated the Project's design alternatives, considering two spatial options: (1) rehabilitating the railway within its existing alignment and (2) improving the horizontal alignment to meet European speed standards. The second option was deemed more favourable. Technically, the options included maintaining a non-electrified railway or upgrading to an electrified line to align with European standards. While current economic conditions do not support immediate electrification, the Detailed Design includes future plans for electrification due to its environmental benefits, such as improved air quality and reduced greenhouse gases emissions. The preferred option is highlighted as environmentally and socially responsible, avoiding significant negative impacts while enhancing social and economic outcomes.

2.3 Description of the Railway Section

The table below presents a description of the entire railway line.

Table 2-3: Description of railway segments

Railway segments		Segment description
No.	Location (chainage)	
1.	<i>Shkozet to Plepa (km 1+876 to km 5+100)</i>	The railway corridor in this segment interacts closely with surrounding land uses. Several private properties, including houses and yards, have direct access to the railway, with frequent informal crossings for personal use. A local road runs parallel to the railway, hosting several businesses, primarily summer accommodation facilities, located within 10-20 m of the tracks. The area also includes recreational spaces and green belts interspersed with access roads and scattered buildings. This segment also includes Shkozet triangle (the junction where the Tirana-Durres line meets the Durres-Rrogozhine line); as well as numerous railway crossings, including one authorised crossing, several unauthorized crossings, and multiple pedestrian footpaths. Additionally, urban waste disposal sites are intermittently present, some of which are used by the Roma community for collecting recyclables.
2.	<i>From Plepa area to Kavaje town (km 5+100 to km 15+000)</i>	In this segment, the railway corridor is closely bordered by a local road and motorway, with several businesses, primarily summer accommodations, located within 10–20 m. Urban waste disposal sites, including those used by the Roma community for recyclable collection, are scattered along the route. Parts of the railway are bordered by green belts, access roads and the motorway, with additional adjacent facilities including a recreational park and a bus terminal. The segment includes several crossings, with two authorised ones, multiple pedestrian overpasses, and numerous informal footpaths. An underpass also allows for safe crossing beneath the railway and motorway. Much of the terrain further along is predominantly agricultural, with cultivated land near the railway, though crossings in these areas are limited. Key community landmarks include the Qerret village cemetery, situated adjacent to the railway, and residential neighbourhoods near Golem Station, where homes are as close as 10–15 m to the tracks. A canal carrying urban wastewater runs near the station, alongside a deteriorated former food storage facility that has been out of use since the 1990s.

Railway segments		Segment description
No.	Location (chainage)	
3.	<i>From Kavaja North to Kavaje South (km 15+000 to km 23+800)</i>	In this segment, several businesses are located within 6-20 m of the railway, primarily on the western side for easier access via the local road. Two gas stations are positioned 10–15 m from the tracks, separated by an access road and green belt. The area includes seven underpasses, two authorised crossings, and five unauthorised crossings, as well as 11 pedestrian footpaths. Urban waste dumpsites and recyclable collection points, used by the Roma community, are scattered throughout the segment. Farming activities occur along the railway, with farmland as close as 7-15 m to the tracks. A fenced private property and house with informal access to the tracks are situated within 10 m of the railway. Near the Kavaja station, a house located approx. 5 m from the tracks relies on the railway for its main access route.
4.	<i>From Kavaje South to Rrogozhine (km 23+800 to km 35+300)</i>	This segment features a mix of small businesses, farming activities, community infrastructure and residential areas near the railway. There are businesses located 10-50 m from the tracks. Farming occurs close to the railway, with fields as near as 7-15 m. The segment includes one legal crossing, nine unauthorised crossings, 11 pedestrian footpaths, and 12 underpasses. Urban waste dumps and recyclable collection points used by the Roma community are scattered along the corridor. Key community facilities include an old school situated 5-10 m from the railway, where students cross the tracks daily, and a newly built, fully fenced school nearby, set to open soon. A football training field is located within 20 m of the tracks, with seating as close as 10 m. Residential and business facilities are present near the Lekaj and Rrogozhine stations, with some properties located just 6-12 m from the railway. Parts of these stations are occupied by families who have been residing there for years. Additional nearby facilities include a car wash, bar, cultivated plots of olive and pomegranate trees, and informal Roma community structures. A cemetery near Rrogozhine station is located approx. 30 m from the railway and accessed via an official crossing.
5.	<i>Tunnel (km 32+470)</i>	There is a tunnel surrounded by residential and agricultural uses. At the tunnel's exit, two houses are located on either side of the track, at distances ranging from 12 to 28 m from the railway. The hill above the tunnel is cultivated with olive trees of various ages. Near the tunnel entrance, approx. 46 m away, there is an inhabited house and a small animal stable.

3 Regulatory Requirements for Stakeholder Engagement

3.1 Local Legislation Requirements

The consultation requirements at the national context are provided by the Albanian Law 1440/2011 “On EIA” and CDM 247/2014: “On the rules and procedures for consultation with public consultation and public involvement during the environmental assessment process”. Article 14 of the EIA Law provides for the public and stakeholders to be involved in the EIA process. The formal procedure of public hearing during the EIA process is provided by the Council of Ministers Decision (CMD) 686/2015, as amended by CMD 714/2019 “On the approval of rules, responsibilities, time frame and procedures of the Environmental Declaration decision transfer”.

3.2 EBRD Requirements

In EBRD Environmental and Social Policy 2019 (ESP), EBRD has defined a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. [PR 10 \(Information Disclosure and Stakeholder Engagement\)](#) emphasises the importance of open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship.

EBRD’s PR 10 requirements can be summarised as follows:

- > The stakeholder engagement process involves stakeholder identification and analysis, engagement planning, information disclosure, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Engagement must begin early in the project development and continue throughout the project life cycle.
- > Clients must ensure that stakeholders have access to timely, relevant and understandable information, and that engagement is conducted in a culturally appropriate and inclusive manner, free from manipulation and coercion. The client will disclose relevant project information, in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs appropriate. Throughout the life of the project, the client will continue to provide information to identified stakeholders on an ongoing basis.
- > The client will undertake meaningful consultation, based on the nature and scale of the project’s adverse risks and impacts and the level of stakeholder interest.
- > To respond to stakeholders’ concerns related to the project in a timely manner, the client will establish an effective grievance mechanism as early as possible in the project development process, to receive and facilitate resolution of stakeholders’ concerns and grievances.
- > Clients are required to develop and implement a SEP that describes how engagement will be carried out, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The client will identify project-affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable.

4 Stakeholder Engagement Program

4.1 Introduction

Communication and information channels have been designed in this SEP taking into account the specific needs of various stakeholder groups.

HSH uses a variety of methods to engage with various types of stakeholders:

- > HSH website and social media
- > Info points and public displays for affected communities
- > One-to-one and small group meetings, with government officials
- > Community/public meetings as needed
- > Posters, brochures and leaflets
- > National and local newspapers.

A Social and Communication Manager has been appointed within the HSH, who will be responsible for stakeholder engagement with the communities. Contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of this SEP. The grievance mechanism requirements will be laid out in the contracts that will be signed with the Contractors (see [Chapter 5](#) of this SEP).

4.2 Overview of Previous Stakeholder Engagement Conducted to date

An overview of the stakeholder engagement activities carried out to date are summarised below:

Table 4-1: Overview of stakeholder engagement activities

Activity	Description
ESIA consultations	<i>Scoping 2020-2021</i> From 2021 to 2022, a series of meetings were held in the municipalities of Durres, Kavaje, and Rrogozhine, as well as at HSH premises in Durres, involving government authorities, ministries, and public institutions. Technical meetings addressed infrastructure details, including underpasses, overpasses, culverts, level crossings, interfaces with Albanian Road Authority properties and pedestrian overpasses. Public consultations engaged local authorities, communities and businesses, focusing on key issues such as infrastructure, land access, and gathering input from both local and central government representatives. <i>ESIA presentations 2022</i> As part of the ESIA process in 2022, HSH conducted public disclosure and stakeholder engagement to inform the public and key stakeholders about the Project's Detailed Design, potential impacts and proposed mitigation measures. Public meetings were held in January 2022 in the municipalities of Kavaje, Rrogozhine and Durres, with a broad range of stakeholders invited, including local government representatives, environmental experts and residents. Due to COVID-19 restrictions, attendance was limited, which reduced overall participation compared to what would have been possible under unrestricted conditions. The meetings presented detailed information on the Project scope, covering the rehabilitation of the Durres-Rrogozhine railway line, planned infrastructure upgrades (such as bridges, tunnels and drainage systems), and anticipated environmental and social impacts. Several key topics were discussed during the public consultations, including planned expropriation, construction of service roads, improvements to drainage systems, and potential impacts on tourism. HSH outlined its commitment to ensure fair compensation during the expropriation process, upgrade of drainage systems and the construction of new channels, and incorporating measures to enhance safety at level crossings, overpasses and underpasses, ensuring alignment with EU safety standards. In response to community concerns about tourism, HSH committed to reinstating a seaside railway stop (note: as part of this commitment, the Detailed

Activity	Description
	Design was subsequently updated to include a stop and platform in the Plazh area). Additionally, HSH pledged to improve safety at currently unprotected level crossings.
Consultations with families living in railway stations	During the preparation of the ESIA package in 2021, consultations were conducted with families residing at three of the four stations to determine their legal status, length of residence, and socio-economic conditions. In 2024, as part of updating this SEP, the Consultant held additional consultations with these families to achieve the same objectives and to assess whether any new circumstances or changes had occurred in the more than three years since the initial consultations. More information about this topic is provided in the LARF.

4.3 Project Stakeholders

Project stakeholders have been identified to address the different consultation requirements. Stakeholders include persons or groups that are:

- > directly and/or indirectly affected by the Project;
- > have certain interests in the Project and its activities; or
- > have the ability to affect the Project itself and its final outcome.

Stakeholder mapping was carried out during the development of this SEP based on discussions with HSH and field visits to the entire railway. Identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in [Chapter 4.5](#).

- 1) **Nearby residents and community groups:** Along the entire railway line, there are settlements, houses, businesses, schools, recreational areas, informal landfills and various other facilities (see Table 2-3 in the previous chapter of this SEP). Some of these are located 10 to 20 m from the railway track, while others are slightly further, up to 50 m away. Roma communities also live along the railway or collect materials from the informal landfills next to the tracks as a source of income. Since the track is not fenced, the local community commonly uses numerous informal crossings (for pedestrians and vehicles) as part of their daily routines.

Construction works near urban areas pose risks such as noise, vibrations, dust, air pollution, and hazardous material contamination, as well as safety hazards from unsecured sites and construction traffic. To mitigate these impacts, the Contractor will implement a Community Health and Safety Plan to secure construction sites, minimise risks near sensitive areas, and restore sites after construction. A Construction Traffic Management Plan will ensure safe transport operations through measures like speed limits and safe access routes. For long-term railway safety, an Operation and Maintenance Plan will include service schedules, asset registers, operational guidelines, and regular inspections to address maintenance needs efficiently.

- 2) **People affected by land acquisition and/or resettlement:** The railway line and associated stations, owned by Albanian Railways, intersect with various groups and activities, necessitating careful planning to mitigate potential impacts. Families living in station buildings will require resettlement, which will be conducted fairly and in accordance with international standards. Roma communities living near some stations may face temporary or permanent resettlement, and special measures will address their needs to minimize disruptions to their livelihoods. Informal waste dumping sites, often used by Roma community members for waste picking, may be removed, requiring alternative livelihood support. Additionally, nearby businesses may be affected by construction activities, with efforts made to minimize disruptions and provide compensation for any losses. To guide the process of physical and economic displacement due to the Project, a Land Acquisition and Resettlement Framework (LARF),

aligned with EBRD and EIB requirements, has been developed as part of the Project's Disclosure Package. The specific land requirements and detailed resettlement measures will be outlined in a Land Acquisition and Resettlement Plan (LARP), informed by a census and socio-economic survey once the Main Design is finalised by the FIDIC contractor. The LARP will guide land acquisition, resettlement activities, compensation measures, livelihood restoration, complaints mechanism and monitoring requirements to ensure a fair and transparent process for all affected groups.

- 3) **Government authorities and public companies:** The key government entities relevant to the Project are presented in the table below.

Table 4-2: Key government entities relevant to the Project

Institution/organisation	Role relevant for the Project
Albanian Railways (HSH)	Beneficiary and Project implementor
Ministry of Infrastructure and Energy of Albania (MIE)	Promoter
Ministry of Finance and Economy	Borrower; provides funds for expropriation
Ministry of Tourism & Environment; National Environmental Agency; Regional Environmental Agency; National Agency of Protected Areas	Governmental Institutions responsible for carrying out the EIA and all other issues related to the environment
Ministry of Agriculture and Rural Development & Regional Directorate of Agriculture; Irrigation & Drainage Directorate (IDD), Durres	Coordinate process related to the drainage and irrigation and any eventual crossing / impact or improvement. They also provide support for crops/trees evaluation for compensation purpose.
National Cadastre Agency	Provides official legal information on the land to be expropriated
State Expropriation Agency (SEA)	Manages the expropriation process in line with the national legislation and based on project LARF/LARP to ensure differences are addressed.
Ministry of Economy, Culture and Innovation Regional Directorate of National Cultural Heritage	Responsible for issuing permits related to CH matters and monitoring works on CH interest areas
Ministry of Education & Sports / Regional Education Offices	Responsible for the policies and issues related to education process and access to education facilities
National Territory Development Agency	Responsible for urban territory development and monitoring at country level; responsible entity to issue the construction permit for the Project.
Affected municipalities; Local Government Units of Durres; Rrogozhine; Kavaje	Responsible for the urban territory development, tourism, etc. at the municipality level, support in public hearing and sharing information
Albanian Road Authority	Responsible for all permits related to main roads/crossings

- 4) **Users of the railway section:** The railway line currently operates infrequently, with services running only twice a week on weekends. As a result, farmers and the local community primarily rely on alternative modes of transportation, such as bus services or private vehicles, with the railway serving as a supplementary option rather than a primary mode of transport. Consequently, the negative impact on this group during the construction phase is expected to be minimal. This is due to both the temporary nature of construction-related disruptions and the community's established reliance on other forms of transport. Additionally, faster, more reliable trains in Albania, will enhance mobility for residents, tourists, and businesses. This Durres-Rrogozhine railway segment, part of the broader Durres-Pogradec line, will eventually connect to North Macedonia as part of the VIII Transportation Corridor. The improved train service will facilitate easier travel between cities and to beach areas, boost tourism, support cargo transport, and reduce road traffic. Most notably, it will help lower air pollution, contributing to better environmental conditions.

- 5) **Stakeholders with general interest in railway projects in Albania, including and potentially interested NGOs:** This category of stakeholders encompasses a broader spectrum of individuals and organisations that, while not directly affected by the Project, may hold an interest in its outcomes. This includes the general population of Durres, Kavaje and Rrogozhine area as well as whole Albania; and any potentially interested NGOs. Any organisations interested in the Project can send their contact details to the PIU to be included in this SEP and notified directly about Project events.
- 6) **Contractors or subcontractors** for construction, monitoring and supervision of works, and their employees – these have not yet been selected, but are crucial stakeholders for the successful execution and delivery of the Project, ensuring safety and compliance during the construction process.
- 7) **HSH employees** will be engaged in the Project’s planning and execution, with emphasis on elements such as ensuring a safe working environment, promoting fair employment practices, addressing labour-related issues during Project implementation, ensuring contractor supervision and maintaining overall ownership of stakeholder engagement and grievance resolution process for local communities.

It should be noted that any stakeholders not identified at this stage of the Project may directly contact HSH to make themselves and their needs known, and to facilitate the effective implementation of the SEP.

4.4 Documents to be Disclosed

HSH will disclose the following documents as early as possible in the Project development process:

1. this Updated Stakeholder Engagement Plan (SEP) and the Project Grievance Form (Appendix 1 of this SEP)
2. the Updated Non-technical Summary (NTS) of the Project
3. the Updated LARF

The documents will be publicly available in Albanian⁴ and English language in electronic and printed forms at:

Table 4-3: Documents disclosure details

Name of organisation	Website	Address
Ministry of Infrastructure and Energy	https://www.infrastruktura.gov.al/	Rruga Abdi Toptani, 4, Tirana
HSH	https://hekurudha.al/	Lagjia nr.3, Egnatia Street, Durres
Durres Municipality	https://www.durres.gov.al/	Sheshi “Liria”, 2000 Durres
Kavaja Municipality	http://www.bashkiakavaje.gov.al/	Bulevardi Josif Buda, Kavaja
Rrogozhina Municipality	https://www.facebook.com/brrogozhine/	Lagjia. nr. 1, Rruga e . “ Kavajës”, Blloku “12 Shtatori”, Rrogozhine

4.4.1 Planned Consultations

Consultations planned during the EIA stage: This Project will be subject to a full EIA procedure under Albanian law, as determined by the National Environmental Agency. The procedure has not been initiated yet. Legally mandated consultations will be conducted as set forth by the *Law on EIA*, the *Council of Ministers Decision on*

⁴ The Roma population in this region of Albania speaks Albanian, so translation into the Roma language is not deemed necessary.

Rules and Procedures for Consultations and Public Involvement During the EIA Process and the Council of Ministers Decision on Rules, Responsibilities, Timeframe and Procedures for EIA.

Consultations planned during the update of the Detailed Design by the Contractor: The Contractor will maintain key ESHS personnel, including a Social Expert, Environmental Expert, Social Expert, H&S Expert and Biodiversity Expert. Specifically, the Contractor's Social Expert will be tasked with engaging local communities and stakeholders, facilitating communication and reporting on social impacts and community concerns/grievance management during Project execution.

In addition, the Contractor will develop its own Stakeholder Engagement Management Plan to align with this SEP and ensure effective communication and engagement with all relevant stakeholders throughout construction. The Contractor's plan will include:

- Alignment with this Project SEP to ensure full consistency, incorporating its key provisions into the Contractor's engagement approach.
- Identification of Contractor-specific responsibilities within the broader engagement framework.
- Establishing a coordination mechanism with HSH and relevant authorities for stakeholder interactions.
- Provision of timely and transparent updates on construction activities, schedules and potential impacts.
- Grievance mechanism for third-party concerns (aligning with the Project-wide grievance mechanism) – *see Chapter 5 on Grievance Management of this SEP for further details.*
- Provisions on regular reporting to HSH/Supervision Engineer.
- Documentation of disclosure and engagement activities.

Community-level meetings will be organised by HSH in cooperation with the Contractor to ensure all impacted residents, including those from smaller communities, have an opportunity to voice their concerns and provide input on the Project and to specifically target underrepresented groups. These consultations will have the following requirements:

1. Such meetings will be held in all villages which administratively belong to the three municipalities. The notice about the planned meetings will be sent to the relevant Head of Villages as it represents an important structure at local level together with the village headship⁵.
2. HSH and the Contractor will provide clear, accessible information during public consultations in the communities along the railway corridor, including detailed maps showing the locations of future level crossings, overpasses, and underpasses for vehicles and pedestrians. These maps will also highlight the roads slated for closure and indicate where vehicle and pedestrian traffic from the closed crossings will be redirected.
3. As part of this engagement, HSH and the Contractor will actively solicit feedback from affected communities, including residents, businesses, and other stakeholders, to ensure their concerns and needs are considered.
4. HSH and the Contractor will ensure that, in addition to other key stakeholders already identified, representatives from Local Education Offices, school officials - particularly those from Lekaj Elementary School, given its proximity to the railway and associated safety concerns - and representatives from the Egnatia Sports Club are actively consulted during this process.
5. Based on the outcome of these consultations, HSH and the Contractor will assess the necessity of planning additional crossings or modifying the design of overpasses and underpasses to meet community needs. Any required adjustments will be incorporated in the Main Design for the

⁵ Based on Law no. 139/2015 on Local Self Government, the village head and the village headship support and implement the self-governing functions of the municipality at village level as well as take care of local economic development, and the use of common resources.

Contractor, ensuring that the final plan reflects both Project objectives and the practical requirements of the communities along the railway line.

6. HSH and the Contractor will inform all stakeholders about the exact date, time and venue where the meetings will be held 10 days in advance through:
 - > HSH website and social media
 - > Websites of the three municipalities as well as posters on city halls
 - > Visible places in the four stations
 - > Visible places in local communities, such as schools, village coffee shops and grocery stores, local health centres
 - > The notice sent directly to relevant Head of Villages
 - > Announcements in local and national media with wide circulation in Albania (including not only online platforms but also local radio stations and newspapers, to ensure that all stakeholders, including the elderly and distanced communities, can access this information)
7. Participants will be able to present their opinions and remarks, as well as suggest possible solutions to the issues raised. All Project-related comments and proposals will be considered. A brief report ("comments matrix") on comments/proposals received and responses from HSH will be published on its website, with explanations for inclusion or exclusion of proposals.
8. Targeted efforts will be made to consult Roma families living along the railway line through separate meetings as needed, culturally sensitive communication, and outreach using trusted local intermediaries to ensure they are informed and included in the process.

Consultations during the construction phase: In cooperation with the Contractor, HSH will place notifications with information on the location, extent, timing and duration of planned works and contact information for third-party concerns at least 30 days in advance at:

- > HSH website and social media
- > Websites of the three municipalities as well as posters on city halls
- > Visible places in the four stations
- > Visible places in local communities, such as schools, village coffee shops and grocery stores, local health centres
- > The notice sent directly to relevant Heads of Villages
- > Announcements in local media with wide circulation in Albania (including not only online platforms but also local radio stations and newspapers, to ensure that all stakeholders, including the elderly and distanced communities, can access this information)

Affected communities will also be notified in advance of any temporary suspensions of utilities, road closures, restricted access to crossings or other disruptions caused by construction. Notifications will be delivered through multiple channels, such as public notices, local radio announcements and coordination with municipal authorities and Heads of Villages. The minimum advance notice for planned disruptions will be 5 calendar days, with emergency notifications issued as soon as practically possible in unforeseen cases.

The Project's grievance mechanism will remain operational throughout construction, enabling affected individuals to submit concerns related to noise, dust, access, safety or any other construction-related issues.

In addition, during construction works, HSH will hold at least one public consultation meeting in each municipality to present the Project progress and receive feedback regarding the impacts of construction works. The meetings will be attended by the representatives of the Contractor, HSH stakeholder engagement manager (SEM), Community Liaison Office (CLO)/ grievance coordinator or other relevant representative from PIU. These meetings will be announced and arranged in the same manner as foreseen for the meetings planned during the Detailed Design stage. All comments and proposals will be documented and appropriately addressed. HSH will

publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

Throughout the entire process, special attention will be given to vulnerable groups, particularly Roma communities living or working near the construction areas, to ensure they are informed and consulted in culturally appropriate ways.

As necessary, HSH will also coordinate with local authorities, schools, health centres and emergency services to minimise disruptions to essential services and ensure timely communication.

Consultations planned during the operation and maintenance phase: Planned consultations during the O&M phase will include implementing awareness and education campaigns to prevent fence jumping and vandalism. These campaigns will be initiated during the fence installation period across all railway-adjacent communities and supplemented with additional campaigns in identified hotspots based on monitoring results.

For the educational institution in Lekaj, which is located in close proximity to the railway, HSH will conduct periodic information sessions at the school. These sessions will aim to raise students' awareness of the dangers of unauthorized railway crossings, climbing protective fences, using unapproved crossings, and other safety risks associated with improper interaction with high-speed railways.

4.5 Engagement Objectives and Methods

A list of identified stakeholders and specific communication requirements are provided in the table below.

As noted previously, this list of stakeholders below may not be final, and that any stakeholders not identified at this stage of the Project may directly contact HSH to make themselves and their needs and interests known. The SEP will be updated accordingly by HSH. Suggestions for improvement of proposed communication methods are also welcome and can be sent to HSH which is open to feedback from stakeholders.

Table 4-4: Engagement Objectives and Methods

Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
Nearby residents and community groups	> Concerns related to scope and timing of construction works - track reconstruction, tunnel widening, demolition and construction of stations, underpasses, bridges and other infrastructure – due to potential impacts from vibration, noise, traffic, access restrictions, etc.) > Closure of level crossings > Tunnel construction risks > Access restrictions for businesses	> Targeted consultations during update of Detailed Design and Main Design development > Notifications to communities on start of works at visible places in the four stations, local community facilities, media, and sent directly to Heads of Villages > Notifications (through multiple channels, such as public notices, local radio announcements and coordination with municipal authorities and Heads of Villages) on any temporary suspensions of utilities, road closures, restricted access to crossings or other disruptions caused by construction > Public meetings organised by HSH during construction in each municipality > Info-panels placed on construction sites > Project grievance mechanism	> Project documents (SEP, NTS, Project Grievance Form) and comments matrix > Information on the extent, timing and duration of planned works > Information on any disruptions in public utilities, including information on the responsible authorities for each public utility service with contact details (person or persons who can be contacted in the event of disconnections)
People affected by land acquisition and/or resettlement	> Expropriation process and timeline, compensation amounts, appeals, etc. > Assistance for persons whose livelihoods are severely affected or vulnerable individuals/households	> Providing timely information on land acquisition activities and responses to questions/grievances. > Developing the future LARP based on household level consultations and engagement	> Targeted consultations and engagement during the development of future LARP (household interviews, focus group discussions, key informant interviews)

Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
	> HSH grievance contact details and management	> Presenting the LARF and future LARP and discussing all land acquisition issues and concerns	> Disclosure and communication as defined in the LARF (disclosure of future LARP, public meetings).
Government authorities and public companies	> Regulatory compliance and adherence to standards	> Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures > Reporting based on national legislation requirements.	> As defined by national legislation for formal permitting and approvals processes and through provision of mitigation measures foreseen under ESMP.
Users of the railway section	> Being notified timely about construction activities and suspension of railway traffic	> Notifications about works > Project grievance mechanism	> Information on the extent, timing and duration of planned works
Stakeholders with general interest in railway projects in Albania, including and potentially interested NGOs	> Protection of the environment and human health	> Consultations during update of Detailed Design and Main Design development > Local media/press releases	> Project documents (SEP, NTS, Project Grievance Form) and comments matrix > Information on the extent, timing and duration of planned works
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees	> Health and safety; labour and working conditions; environmental setting and impacts	> Information through contracting > Communication via supervising engineers > Toolbox talks at construction sites on health and safety topics > Trainings and inductions before mobilisation > Workers' grievance mechanism	> Work safety and health regulations > Information on workers' grievance mechanism
HSH employees	> Involvement in Project planning and implementation, safe working conditions, fair employment practices and other labour related issues	> Project management channels > Workers' grievance mechanism >	> Project implementation arrangements > Information on workers' grievance mechanism

5 Grievance Management

Overview

A Project-level grievance mechanism has been set up for affected communities as a process for receiving, evaluating and addressing grievances from affected communities in relation to this specific Project. HSH will implement the grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. Additionally, HSH will send the grievance mechanism form to all relevant Heads of Villages.

Both HSH and the Contractors on site (including their subcontractors) will accept and manage complaints associated with the Project. Note: As explained previously, the Contractor will develop its own Stakeholder Engagement Management Plan and implement the grievance management provisions defined in this SEP. Among other issues, the Plan will include a grievance mechanism for third-party concerns aligned with the Project-wide system; provide for regular reporting to HSH and the Supervision Engineer; and document all disclosure and stakeholder engagement activities.

At all times, complainants may seek other legal remedies in accordance with the legal framework of Albania, including formal judicial appeal as the project grievance mechanism is a voluntary remedy instrument offered to affected stakeholders by HSH.

HSH will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below.

This chapter includes the following supporting appendices: Project Grievance Form (Appendix 1), template of the Grievance Registry (Appendix 2), and template of the Stakeholder Engagement Registry (Appendix 3).

The following sections of this chapter elaborate the Project grievance procedure and steps. A separate grievance mechanism is available for workers.

Submitting grievances

Any concerns can be brought to the attention of HSH verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

After the start of reconstruction activities, the Project Grievance Form may also be submitted directly to the Contractor for construction works, which will receive and record grievances, provide and explain the grievance form and the process and address grievances within their remit directly and in a timely manner. The Contractor will also forward any such received grievances to HSH without delay (within 24 hours) to allow HSH to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below). The Contractors are obliged to hand out the Project Grievance Form, explain the grievance mechanism to the concerned citizen(s) and forward the filled-in form to HSH.

Recording and acknowledging grievances

HSH will record all grievances in a Grievance Registry (format provided in Appendix 2), separate from the Stakeholder Engagement Registry (Appendix 3 of this SEP), which details interactions with communities and stakeholders.

All grievances will be assigned a number. Written and non-anonymous grievances will be acknowledged within 5 working days. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

- > description of grievance including an indication of the type (topic) of the grievance – such as grievances related to gender-based violence and harassment, grievances related to construction noise, grievances related to inadequate storage of construction materials and equipment, etc. – to enable timely detection of most frequent incidents, ascertain trends and manage risks,
- > details about the complainant profile (gender, age, location and vulnerabilities if known), to understand who and where is most affected by potentially negative impacts of the Project,
- > date of receipt of grievance and when acknowledgement returned to the complainant,
- > description of actions taken (investigation, corrective measures, preventive measures), and
- > date of resolution and closure/provision of feedback to the complainant, including recording of level of satisfaction with the proposed resolution.

Assisting complainants

If the grievance is vague and not clear enough, HSH will assist and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer, for purposes of an informed decision by HSH, in the best interests of persons affected by the Project and in consideration of the preferred resolution steps of the complainant.

Grievance resolution

HSH will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If HSH is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 10 working days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

During the process of informing the complainant of the proposed action, HSH will validate complainant satisfaction through providing a grievance close-out form for the resolved grievance to be signed by the complainant (if the complainant agrees) and HSH to attest to their mutual satisfaction. HSH will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

If HSH is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/justification on why the issue was not addressed. The response will also contain an explanation on how the person/organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

Contact information for grievances:

Social and Communication Manager
Albanian Railways
Mailing address: Egnatia, No. 3 Durres, Albania
Tel: +355 67 22 21 452 / +355 52 22 037
E-mail: ankesa-projekte@hekurudha.al
https://hekurudha.al/

Second level of grievance management

If the complainant is not satisfied with the implemented corrective action and/or a justification on why the corrective action is not required, the complaint will be directed to the Grievance Committee, which shall function as a third-party independent mediator. This would be the second level of grievance management, processing those grievances that the first level is not able to resolve.

The Grievance Committee will include one member of each Municipality in which the railway passes through, two representatives of the affected people and one representative of an independent civil society organisation, or highly regarded lawyer or other person.

The Committee will re-evaluate previously carried corrective action and/or the justification on why an action is not required, and reconsider alternatives to address the complaint on the satisfactory manner. The complainant will be informed about the proposed alternative corrective action and follow-up of alternative corrective action within 3 months upon the acknowledgement of grievance.

EBRD's Independent Project Accountability Mechanism

In addition to the Project-level mechanism managed by HSH, the EBRD's Independent Project Accountability Mechanism⁶ (IPAM), as an independent mechanism that aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

⁶ Information about the IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

6 Monitoring and Reporting

The results of the stakeholder engagement process will be included in Environmental and Social Reports to EBRD which will be prepared by HSH, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism.

The Reports will include the following information:

- > **Number and types (topics) of received community grievances** (e.g., grievances related to gender-based violence and harassment, grievances related to construction noise, grievances related to inadequate storage of construction materials and equipment, etc. – to enable timely detection of most frequent incidents) (with sex-aggregated data on complainants, if known) raised in the reporting period, with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism;
- > **Number and types of information disclosure and engagement activities** through all channels, with information on issues and concerns raised and information on how the issues raised were taken into consideration by the HSH.

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

Appendix 3 of this SEP provides a template for tracking stakeholder engagement activities.

7 Appendixes

Appendix 1: Project Grievance Form

Reference Number	
Full name (optional) > I request that you do not disclose my identity without my consent.	
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ By Telephone: _____ By E-mail: _____
Preferred language of communication	> Albanian > Roma > English (if possible) > Other _____
Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / 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?	

Signature: _____

Date: _____

Please return this form to:
Social and Communication Manager

Albanian Railways

Mailing address: Egnatia, No. 3 Durres, Albania

Tel: +355 67 22 21 452 / +355 52 22 037

E-mail: ankesat@hsh.com.al

<https://hekurudha.al/>

Appendix 2: Grievance Registry – Template

Note: Any personal data will be processed in line with Albanian regulations on personal data protection.

	Name of complainant	Sex of complainant	Contact information	Date received	Date acknowledged	Grievance description	Proposed solution	Date of closure	Close-out form signed (Y/N)	Grievance follow-up	Recurrence (Y/N)	Action/ notes
1.	Enter name or 'anonymous' or 'confidential'											
2.												
3.												

Appendix 3: Internal Stakeholder Engagement Registry – Template

Note: Any personal data will be processed in line with Albanian regulations on personal data protection.

	Stakeholder category and name	Type of engagement	Date of engagement	Key issues/concerns	Follow-up action agreed	Notes on progress
1.	(E.g., affected resident, ...)	(E.g., official meeting, presentation, informal meeting...)				
2.						
3.						