APPENDIX B STAKEHOLDER ENGAGEMENT PLAN



TABLE OF CONTENTS

	<u>Page</u>
LIST OF TABLES	I
LIST OF FIGURES	I
1 PROJECT SUMMARY	1
2 REGULATORY REQUIREMENTS	2
2.1 ALBANIAN REGULATIONS ON PUBLIC ACCESS TO INFORMATION	2
2.2 EBRD POLICIES	2
3 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	4
4 PROJECT STAKEHOLDERS AND TOOLS FOR COMMUNICATION	5
4.1 STAKEHOLDERS RELEVANT FOR THE PROJECT	5
4.2 DISCLOSURE OF INFORMATION AND COMMUNICATION TOOLS	5
4.3 INFORMATION PROVIDED BY THE CONTRACTORS	11
5 TIMETABLE	12
6 IMPLEMENTATION RESPONSIBILITIES	13
7 PUBLIC GRIEVANCE MECHANISM	14
8 MONITORING AND REPORTING	15
9 GRD CONTACT INFORMATION	16
LIST OF TABLES	
Tables No.	<u>Page</u>
Table B.4.1: Identified Stakeholders for the Project	7
Table B.5.1: Timetable of main Consultation/Information Activities	12
LIST OF FIGURES	
Figure No.	<u>Page</u>
Figure B.1.1: Project Location	1

APPENDIX B STAKEHOLDER ENGAGEMENT PLAN

1 PROJECT SUMMARY

The Project concerns the construction of a new dual carriageway road bypass between the towns of Fier and Levan (Fier Bypass) for a total length of approximately 22 km, for which EBRD is considering the provision of a loan. The Fier Bypass is part of an important corridor for Albania, from North to South (Lushnje to Vlore), for which some sections are already constructed or under construction.

The alignment is located west to Fier, between the town and the shore line, for the most part within a plain that is intensively cultivated and irrigated. It crosses the Seman River, a significant water course, downstream to its confluent with river Gjanica, and a number of large irrigation and drainage canals as well as numerous smaller irrigation and drainage structures.

The alignment is very important for the growth of southern Albania for both industrial and tourism development with important repercussions also on agriculture, being the region of Fier the most important agricultural producer of the country.

An initial alignment that passed close to the cultural heritage site of Apollonia and within its designated protection perimeter was modified to take account of objections from the Ministry of Culture as well as from the local population and authorities. The alignment now makes a detour (about 2.5 km) to pass well away from this site (see the following figure).

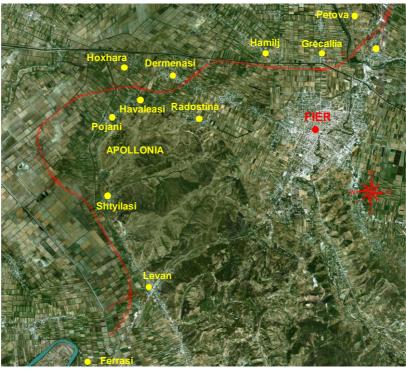


Figure B.1.1: Project Location

2 REGULATORY REQUIREMENTS

2.1 ALBANIAN REGULATIONS ON PUBLIC ACCESS TO INFORMATION

In Albania, the constitution of 1998 guarantees the right of access to information; the legislation supporting this is the Law No. 8503, dated June 30, 1999, On the right to information over the official documents (*Ligji nr. 8503*, date 30.6.1999, Per të drejten e informimit per dokumentat zyrtare).

2.2 EBRD POLICIES

The provisions of the EBRD Environmental and Social Policy (2008) and the Public Information Policy (2008) for public consultations and access to information have been fully taken into account in preparing this Stakeholder Engagement Plan for the Project.

EBRD Environmental and Social Policy (2008)¹. The policy covers the environmental and social dimensions of sustainable development. EBRD considers stakeholder engagement as an essential part of good business practices and corporate citizenship, and a way of improving the quality of projects. In particular, effective community engagement is central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits.

According to the Policy, stakeholder engagement is an ongoing process involving:

- the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders;
- meaningful consultation with potentially affected parties, and
- a procedure or policy by which people can make comments or complaints. This process should begin at the earliest stage of project planning and continue throughout the life of the project.

This process should begin at the earliest stage of project planning and continue throughout its life. EBRD expects clients to identify and interact with their stakeholders on an ongoing basis, and to engage with potentially affected communities through disclosure of information, consultation, and informed participation.

Performance Requirement 10 of the Policy is dedicated to the issue of stakeholders and sets out the Bank's requirements for clients to identify stakeholders potentially affected by their projects, disclose sufficient information about issues and impacts arising from the projects and consult with stakeholders in a meaningful and culturally appropriate manner. All EBRD-financed projects undergo environmental and social appraisal both to help the EBRD decide if an activity should be financed and, if so, the way in which environmental and social issues should be addressed in planning, financing, and implementation. The client is responsible for ensuring that information disclosure and stakeholder engagement is carried out in accordance with PR 10. The Fier Bypass Project Stakeholder Engagement Plan includes all the elements required by PR 10.

http://www.ebrd.com/downloads/research/policies/2008policy.pdf



EBRD Public Information Policy (2008)². The EBRD Public Information Policy sets out how the EBRD discloses information and consults with its stakeholders so as to promote better awareness and understanding of its strategies, policies and operations. The project documentation will be enclosed for the public on the EBRD website in accordance with this Policy.

_

http://www.ebrd.com/downloads/policies/pip/pipe.pdf

3 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The public were invited to take part in a preliminary consultation exercise to assist with the preparation of the EIA for the Fier By-pass Project. One initial public consultation was held on the 9th of December 2006 in Fier³. The aim of the consultation exercise was to inform the public of the road scheme under preparation and to collect feedback from members of the public and from the representatives of the local Communes. The consultation was advertised in the press and on display in public venues in the locality.

The latest consultations took place on the 10th of November 2010, in the premises of the Fier Prefecture⁴. The invitation was addressed to all stakeholders.

The aim of the consultations was to inform the public of the road scheme revision and of other developments under preparation as well as to collect feedback from members of the public and from representatives of the local Communes. The program for procurement and construction was discussed with the stakeholder present in the meeting.

It appears that these meetings were organised especially with local governments and official representatives; direct information to PAPs appears to have been limited and eventually done through head of villages.

Interviews done with PAPs and different stakeholders during the due diligence⁵ confirmed that:

- many PAPs are not adequately informed;
- due to changes in the administration, there is the need to inform the new Mayors of the communes involved;
- the main worries of PAPs are the price they will receive as compensation: either because it is not envisaged to be in line with the market price or because of the differences in land valuation between sites;
- even if the procurement and construction schedule was discussed with PAPs representatives during the first public consultation, several program changes occurred since then, and PAPs want to have a final idea of the planning of the works; the delays do not encourage local investments in agriculture and in other fields;
- the process of land/buildings registration and legalisation is long and sometimes difficult: technical data from the cadastre is not accurate and discrepancies may become very time consuming to solve.

The GRD considers the land unit prices as fair and explains that this was calculated based on: i) indications of the Ministry for Public Works and Transportation's Commission according to Cadastral prices, ii) indications of the Compensation Committee according to former owner prices and iii) data provided by the Ministry of Finance.

Apparently the information collected during the public consultation is integrated in the EIA; however minutes of the meeting are not available. Public opinion surveys and interviews with groups of affected individuals are also reported but there is no document informing of that.

Minutes of the meeting are reported as Appendix 1 of the EIA Report, Draft 6, 07/02/2011.

The due diligence team had two meetings at the Fier Municipality with the Prefect of Fier, different public officers of the Fier municipality and prefecture, representatives from the Communes (whenever possible old and new Mayors), a few head of villages. The team also visited a few PAPs to collect information and feedbacks.

4 PROJECT STAKEHOLDERS AND TOOLS FOR COMMUNICATION

4.1 STAKEHOLDERS RELEVANT FOR THE PROJECT

Project stakeholders have been identified in order to address the consultation requirements. These stakeholders need to be informed about Project activities and consulted throughout the entire project cycle. They include persons or groups that are:

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

Particular attention shall be paid to PAPs and vulnerable groups. PAPs and vulnerable groups include individuals or groups greatly affected by the Project and who have very little ability to influence its implementation.

Vulnerable groups need to be informed and consulted in a specific way, suited to their needs and vulnerability status. The Government Department of Social Assistance and Labour Offices will be in charge to facilitate the involvement of vulnerable groups.

Please see Table 4.1. for definition of stakeholders, identified stakeholders to the Project and their detail description.

4.2 DISCLOSURE OF INFORMATION AND COMMUNICATION TOOLS

In order to adequately respond to the needs of different groups, communication and information channels have been designed for all identified stakeholders in accordance with their needs.

- the GRD will disclose the following information:
- project information sheet
- project description
- non-technical Summary of the Environmental Impact Assessment for the Fier Bypass (NTS)
- summary of the Environmental and Social Action Plan (ESAP);
- summary of Project Implementation Monitoring Reports;
- summary of Resettlement Action Plan (RAP);
- stakeholder Engagement Plan (SEP);
- summary of conclusions from the consultative meetings and public discussions held;
- grievance form.

The foregoing documents will be disclosed and remain available for the life of EBRD's loan. The GRD will carry out public consultations that will reflect upon the issues of relevance to the Project. All interested stakeholders will be timely informed about the exact time and place of venue by using the foreseen means of communications specified in the SEP.

The GRD will also provide printed copies of the above-mentioned documents which will be available in the GRD office, the offices of municipalities and communes, as well as the villages. All PAPs will be informed on the availability of these documents at the offices



through local TV and newspapers and project information sheets delivered and posted in the villages (see Annex 1 and 2 for contact information of relevant public institutions, communes and villages).

Access to information for identified vulnerable groups will be facilitated by the GRD as appropriate for each person/family according to their specific needs and/or situation. Please see Table 4.1 for proposed communication tools with each stakeholder group.

Table B.4.1: Identified Stakeholders for the Project

No.	Definition of Stakeholders	Identified Stakeholder Group	Detailed Description of Identified Stakeholder Groups	Population	Relevant issues	Proposed Communication tools
1.	External stakeholders Project affected people/groups are individuals, households and businesses, owners or users, who will be subject to impacts caused by land acquisition and/or land use (permanent/temporary) related to the Project activities	Project Affected People (PAPs)	Persons and households, businesses along the Fier Bypass route	ca. 2500 ⁶	Providing timely information on expropriation activities: Tel: ++355 4 233711 Email: ermalnuri@yahoo.com	 Disclosure through the GRD website Delivering project leaflets to PAPs with dedicated information on Project and their rights (e.g. expropration, consultation, etc.) Delivering relevant documentation to local communities on whose territory expropriation is carried out (particularly RAP and SEP) Organizing individual meetings on the need basis Public meetings
2.	External stakeholders People affected by Project activities living in the vincinity of road construction sites, as well as the wider population indirectly affected	Local residents and businesses in the project area Users of new road	 Population affected by construction and by access restrictions along the Fier Bypass route; Population who may benefit from the better traffic access. 	Unknown	Providing timely information to the public on construction activities: Tel: ++355 4 233711 Email: ermalnuri@yahoo.com	 Disclosure through the GRD website Local daily newspapers Local media: TV Apolon and TV Combi Posters in the center of the villages Pubilc meetings

_

An approximate figure based on the number of affected properties in the route of the Fier Bypass (626) and on the assumption that the average household is composed of 4 members.

No.	Definition of Stakeholders	Identified Stakeholder Group	Detailed Description of Identified Stakeholder Groups	Population	Relevant issues	Proposed Communication tools
3.	External stakeholders Vulnerable groups include individuals or groups greatly affected by the Project and who have very little ability to influence its implementation	Affected vulnerable groups (especially if they are affected by involuntary resettlement)	 Elderly and ill persons; Persons with special needs; Households with very low or no income, particularly those who are not owners of any property (formal and informal users); Single parent-headed households; Ethnic minorities. 	Unknown	Providing timely information on expropriation activities: Tel: ++355 4 233711 Email: ermalnuri@yahoo.com	 Disclosure through the GRD website Delivering information by post Delivering specially prepared leaflets explaining simply and clearly what is happening and people's rights to local communities on whose territory expropriation is carried out (particularly RAP and SEP) Proactively providing information and assistance in understanding the delivered information and submitted documentation
4.	External stakeholders Stakeholders with specific interest in the Project., who also have the ability to affect the final outcome of the Project	Government departments involved in the Project/Public institutions	 Ministry of Transport GRD Fier Prefecture, Prefect Office Immobiliary Register Office, Fier branch Drainage and Irrigation Board of Fier Region Fier Regional Office of Social Services Regional Agency of Development, Fier Environmental Regional Office Apollonian Archeological 	N/A	Consultations with relevant government departments concerning Project activities	 Regular contacts through internal communication channels Meetings on the need basis

No.	Definition of Stakeholders	Identified Stakeholder Group	Detailed Description of Identified Stakeholder Groups	Population	Relevant issues	Proposed Communication tools
			Park			
5.		Municipalities and/or Communues at in the Project location	 Darmenas Commune Mbrostar Commune Qender Fier Commune Levan Commune 	N/A	Draviding timely information	
6.		Vilages	- Baltez Village - Hamil Village - Dermenas Village - Havaleas Village - Pojan Village - Sopi Village - Petove Village - Mbrostar Village - Daullas Village - Mbrostar Ferko Village - Clrim Village - Afrim I Ri Village - Rajoni Nr. 1, Fier	N/A	Providing timely information on planned road construction and expansion works, consultations regarding the prepared plans and documentation, grievance management: Tel: ++355 4 233711 Email: ermalnuri@yahoo.com Regular contacts the internal communicate channels Local daily newspare Local media: TV Ap TV Kombi Public meetings	
7.	External stakeholders Non-governmental organizations in various field of activities, environmental NGOs, and other civil society organizations demonstrating an interest for the Project and/or are able to influence the Project	Interested NGOs on national and local level	 Albanian Agribusiness Association (Tirana office) Irrigation and Drainage Organization (Dermenas commune) Irrigation and Drainage organization (Levan Commune) Albanian Savings and Credit Union (Fier region Branch) Union of Albanian Roma People- Amaro Drom 	N/A	Providing timely information, communication and consultation, grievance management: Tel: ++355 4 233711 Email: ermalnuri@yahoo.com	 Disclosure through the GRD website Local daily newspapers Local media: TV Apolon and TV Combi Posters in the center of the villages Public meetings Regular meetings on the issues of irrigation and drainage



No.	Definition of Stakeholders	Identified Stakeholder Group	Detailed Description of Identified Stakeholder Groups	Population	Relevant issues	Proposed Communication tools
8.	Internal stakeholders Stakeholders of high significance for the Project's success who are directly or indirectly in charge for project planning and implementation	Employees and workers	 GRD employees Construction workers and temporary workers Contractors Companies contracted to monitor and supervise the works 	N/A	Grievance procedure, code of conduct and work safety and health regulations, environmental protection requirements	 GRD workers: Internal bulletin board in the GRD building, grievance procedure for the employees Contractors: Information on contracts, bulletin board, training



4.3 INFORMATION PROVIDED BY THE CONTRACTORS

During the construction works, the contractors will submit quarterly information regarding the progress of works, which will be disclosed on the GRD website.

The schedule of works and its potential amendments will be submitted to the Communes and Villages approximately two (2) weeks prior to the commencement of the construction activities. The schedule will provide information on the starting and ending dates of the works which may impact the affected groups (such as access, noise and dust). These shall need to be disseminated in an appropriate way to the potentially affected community members. Contractors should be obliged to ensure this happens.

Special attention will be given to the possible temporary disruptions of the drainage and irrigation canals.

The opportunity to raise grievances will be provided (Grievance Mechanism in Chapter 7); contact details for disclosing information or allowing expressing concerns will be presented. The notification will be disclosed on the website, on the bulletin boards, and at the offices of the Communes and centres of the Villages.

In summary, the contractors will:

- contact directly all parties in order to provide information on the construction works at least two weeks prior to commencement of works, disclosing the schedule of works;
- quarterly update the information on the progress of works (to be delivered to the GRD for online disclosure, and affected peoples via mail or personal contact);
- disclose information on any delays to affected persons.

5 TIMETABLE

The first Project public meeting will take place in August 2011, while the exact date and place of venue will be announced to the public at least two weeks in advance. All information on the Project will be disclosed to the public prior to the first public meeting.

It is envisaged that the second Project public meeting will take place prior to the commencement of construction activities that are expected to start at the beginning of 2012.

Prior to the commencement of the Project, all affected groups will be informed about the Project's scope and contact information which they can address for further information. They will be informed about the availability of the publicly available information on the GRD website as well as at the Commune offices and Villages. This way of informing will be carried out by using the Project Information Sheet delivered to the Communes and Villages and placed on the bulletin boards. Neighbourhood meetings at Villages will take place on the need basis and every 4 months after the project effectiveness until the completion of the Project.

Table B.5.1: Timetable of main Consultation/Information Activities

Activity	Expected Dates	Reponsibility
Second Project public meeting	August 2011	GRD
Third Project public meeting	Prior to commencement of construction activities	GRD
Project information/documents made available to the public	July 2011 (prior to the first meeting)	GRD
Placement of the project information sheet on GRD website and Communes and Villages bulletin boards	Prior to the start of the Project	GRD
Regular neighbourhood meetings	Every 4 months, and on a need basis	GRD and Contractors



6 IMPLEMENTATION RESPONSIBILITIES

GRD is responsible for the implementation of the SEP during the entire project cycle. GRD will appoint a qualified person from the Government Department for Social Protection to act on behalf of the GRD during the implementation of the information program intended for the identified vulnerable groups.

All contractors in charge of carrying out specific Project activities are obliged to implement the SEP. The provisions of SEP implementation, including the grievance mechanism, entrusted to contractors will be laid out in the tender documentation and contracts signed with the contractor.



7 PUBLIC GRIEVANCE MECHANISM

Comments or concerns can be brought to the attention of the GRD verbally or in writing (by post or e-mail) or by filling in a grievance form (see example at the end of this document). The concerned person shall indicate in its communication if he/she wishes his/her name to be kept confidential.

All grievances will be put in a register and assigned a number, and acknowledged within 7 days.

The GRD will make all reasonable efforts to address complaints upon the acknowledgement of a grievance. If the GRD 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 of the proposed corrective action and of its follow-up within 25 days from the acknowledgement of the grievance.

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

The responsible person for the implementation of grievance mechanism is the Project Manager of the GRD PIU (contact information provided in Chapter 9). In case that the responsible person is changed, the GRD will amend the SEP with new information and disseminate it accordingly.

The Contractors must follow this grievance mechanism during the construction phase to address grievances, especially to address drainage and irrigation issues. GRD will be included in monitoring of Contractor's application of grievance mechanisms and involved in addressing the concerns through the above-described process.

See Annex 3 for the Grievance Process Flowchart and Annex 4 for the Grievance Form. Contact information is provided in Chapter 9.



8 MONITORING AND REPORTING

The results of the stakeholder engagement process will be included in the Project Monitoring Reports, including the summary of these Reports. They should include the following information on the stakeholder engagement:

- place and time of carried out public consultative meetings (including other types of engagement activities);
- information on the participants;
- issues and concerns raised during the consultative meetings;
- list of number and types of grievances raised in the reporting period and the number of resolved and/or outstanding grievances;
- RAP grievance monitoring results;
- information on how the issues raised during the meetings were taken into consideration by the organization in charge of the Project implementation.

The Reports will also include a summary of implemented corrective measures meant to address the grievances.

The Monitoring reports will be made public on the GRD website.



9 GRD CONTACT INFORMATION

Attention: Mr. Ermal Nuri

Company: General Roads Directorate Postal Address: Rr Sami Frasheri 33

Tirana, Albania

Telephone: ++355 4 233711

Fax: ++355 4 233711

E-mail address: ermalnuri@yahoo.com

Contactor Details: TBA



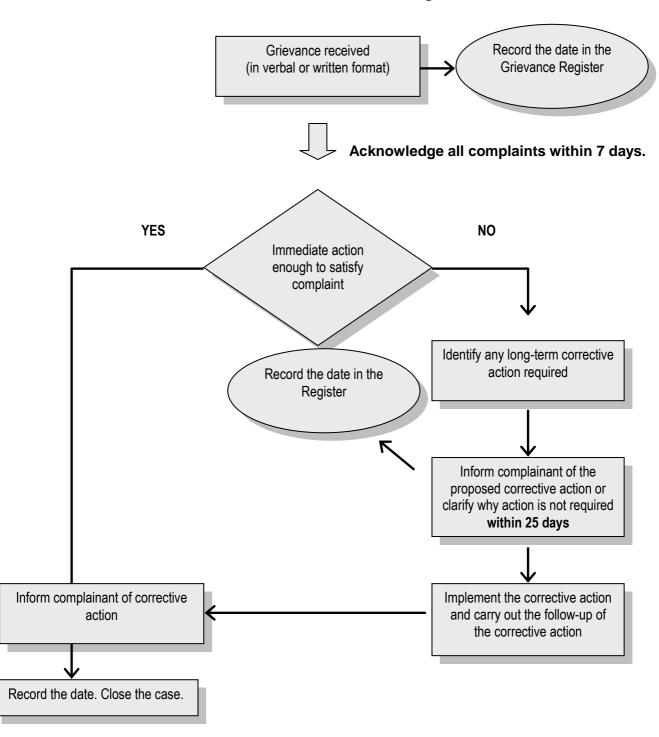
Annex 1 – List of Public institutions and Local Associations

FIER REGION				
	Name	Position	Contact	
Public institutions at regional level	·			
Fier Prefecture, Prefect Office	Bujar Hasaj	Prefect of Fier	0694118	8600; 00355 342 2522
Office for Registration of Immovable Assets, Fier branch			00355 3	342 6485
Drainage and Irrigation Board of Fier Region	Ramadan Krasniqi	Director	0682207	7776
Fier Regional Office of Social Services	Aleksander Shanaj	Director	00355 342 567	
Regional Agency for Development, Fier	Dhimitraq Marko	Director	00355 342 4537, marko@albmail.com	
Environmental Regional Office	Iljaz Haxhiu	Director	0689000790	
Apollonian Archeological Park	Marin Haxhimihali	Director	0692070500	
Local Association				
Albanian Agribusiness Association (Tirana office)	info@kash.org.al			
Irrigation and drainage organization (Dermenas commune)	Ylvi Danaj	Chief of association 0692101916		0692101916
Irrigation and drainage organization (Levan Commune)	Lutfi Bako Chief of association 0692787418		0692787418	
Albanian Savings and Credit Union (Fier region Branch)	fier@ascunion.org.al			
Union of Albanian Roma people- Amaro Drom	Tel: 00355 4 22 31 391; 00355 4 22 48 925; amarodrom@abisnet.al			

Annex 2 – List of Communes and Affected Villages

Local Governments			
	Name, surname	Position	Contact
DERMENAS COMMUNE	· · · · · ·		<u>.</u>
Dermenas Commune	Viktor Fasko	Mayer	0694001102
Dermenas Commune	Durim Beqiraj	Cadastral office	0694234256
Dermenas Commune	Todi Bushi	Topographer	0695226616
Baltez Village	Lavdosh Reclani	Head of village	0688227584
Hamil Village	Ferdinand Gurguri	Head of village	0692101480
Dermenas Village	Hysen Brahimi	Head of village	-
Havaleas Village	Zylyf Vrenozi	Head of village	0692671553
Pojan + Sopi Villages	Naum Vidhi	Head of village	0695605279
MBROSTAR COMMUNE			
Mbrostar Commune	Gezim Dhima	Mayer	0695762250
Mbrostar Commune	Hyqmet Cepele	Cadastral office	0692189604
Mbrostar Commune	Bajram Berberi	Topographer	0694458400
Petove Village	Ismet Crraga	Head of village	0682242112
Mbrostar Village	Bashkim Bace	Head of village	0692116397
QENDER FIER COMMUNE			
Qender Fier commune	Harrilla Mile	Mayer	0692099712
Qender Fier commune	Mimoza Spiro	Cadastral office	0692476838
Qender Fier commune	Vasillaq Cala	Topographer	0695451875
Daullas Village	Trifon Sako	Head of village	0693673321
Mbrostar Ferko Village	-	Head of village	-
Clrim Village	Luan Vrenozi	Head of village	0692663327
Afrim I Ri Village	Novruz Dule	Head of village	0693212645
Rajoni Nr. 1, Fier	Asqeri Ruko	Head of Region	0695236505
LEVAN COMMUNE			
Levan Commune	Xheladin Malaj	Mayer	0696199489
Levan Commune	Staver Kordha	Cadastral office	0693367126
Levan Commune	Zaim Tafa	Topographer	0682239010
Shtyllas Village	Marash Kovaci	Head of village	0692105108

Annex 3 - Flowchart for Processing Grievances





Annex 4 - Public Grievance Form

Reference No:	
Full Name	
Contact Information	
Contact information	☐ By Post: Please provide mailing address:
Please mark how you wish	
to be contacted (mail,	
telephone, e-mail).	
	☐ By Telephone:
	□ By E-mail
Preferred Language for communication	☐ Albanian
communication	☐ English
Description of Incident or G	rievance: What happened? Where did it happen? Who did it happen
Description of moldent of o	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 I	nappen to resolve the problem?
ature:	
<u> </u>	

Please return this form to: Attention: Mr. Ermal Nuri

Company: General Roads Directorate Postal Address: Rr Sami Frasheri 33

Tirana, Albania

Telephone: ++355 4 233711 Fax: ++355 4 233711

E-mail address: ermalnuri@yahoo.com