

**Republic of North Macedonia
PUBLIC ENTERPRISE FOR STATE ROADS**



STAKEHOLDER ENGAGEMENT PLAN (SEP)

**Environmental and Social Assessment for EBRD
Brownfield: Category B Project 50769 - Highway Tolling,
North Macedonia**



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LIST OF ABBREVIATIONS

CSO	Civil Society Organization
EBRD	European Bank for Reconstruction and Development
EHSS	Environmental, Health and Safety and Social
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
LAF	Land Acquisition Framework
MC	Ministry of Culture
MEPP	Ministry of Environment and Physical Planning
MTC	Ministry of Transport and Communications
NGO	Non-governmental Organization
NTS	Non-technical Summary
PESR	Public Enterprise of State Roads
PR	Performance Requirement
Ref.	Reference
RM	Republic of Macedonia
SEP	Stakeholder Engagement Plan
TBD	To be determined
TMP	Traffic Management Plan



Environmental and Social Assessment for EBRD Brownfield: Category B Project 50769 - Highway Tolling, North Macedonia

STAKEHOLDERS ENGAGEMENT PLAN (SEP)

1 | INTRODUCTION

The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") is considering providing finance of up to EUR 13 million to Public Enterprise for State Roads of Republic of North Macedonia (the "PESR" or the "Client"). The Loan will enable the Client to finance the project "Brownfield: Category B Project 50769 - Highway Tolling" (the "Project").

The Public Enterprise for State Roads (PESR) intends to realize a project for the improvement and modernisation of the existing toll system on Corridor VIII as well as the installation of new electronic toll stations on new highway sections that are being built in Macedonia. Figure 1 below shows the location of the highways in RN Macedonia.

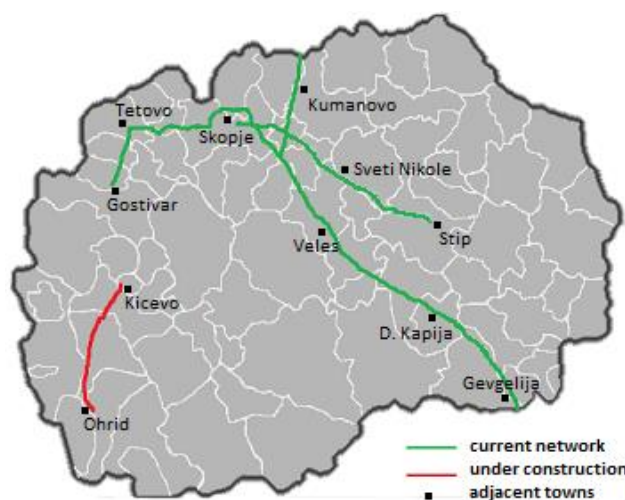


Figure 1 Location of the highways in Republic of North Macedonia

The Project has been developed by PESR in line with the national legislative requirements and those of the European Bank for Reconstruction and Development (EBRD). The EBRD is considering providing finance for the Project.

This Stakeholder Engagement Plan (SEP) outlines the approach and actions PESR will undertake for engagement with external stakeholders and local communities in connection with the Project. The SEP includes a grievance mechanism for stakeholders and people to raise their concerns about the Project. The SEP shall be a live document and updated periodically by PESR.

2 | LOCATION AND DESCRIPTION OF THE PROJECT

The aim of the Project is improvement and modernization of toll system that will support the operation of a unified and fully interoperable toll system on the motorway network of RN Macedonia, and will improve the current situation which consists of two different toll systems with different user interfaces. Also to promote green economy through the generation of renewable energy from photo voltaic solar panels which will be installed on all 15 existing and new toll stations.

Project covers the following activities:

- (i) upgrade and modernisation of existing toll stations on Corridor VIII as well as the construction of three toll stations on new highway sections that are being built in N. Macedonia;
- (ii) Installation of equipment to link the upgraded and new toll stations to the toll operation centre in Skopje;



(iii) Construction of an additional lane to increase the capacity of the Miladinovci toll station on the Corridor VIII;

(iv) Installation of photo voltaic (PV) solar panels on all the existing and new toll stations that are being built on the entire motorway network in the country.

The Project components are going to be realized on dedicated locations along the Corridor VIII, primary axis of the Corridor X, and dedicated locations along the Corridor X. The following Figure 2 present the locations of all existing and future toll stations in the country where realization of Project Components and associated activities should be executed. Figure 2 below shows the location of Toll Stations in RN Macedonia.

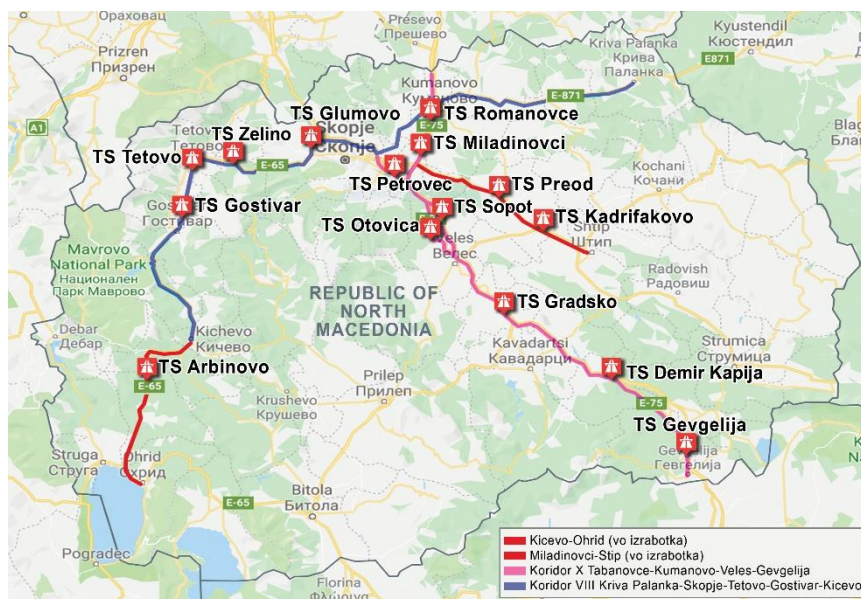


Figure 2 Location of the Toll stations in Republic of North Macedonia

The Project is a follow-on operation of the previous EBRD's projects for the construction of a new motorway section on Corridor 10 – recently completed, and construction and reconstruction of eight toll stations along Corridor 10, including installation of electronic toll collection ("ETC") equipment currently under implementation.

(i) Upgrade and modernization of existing toll stations on Corridor VIII as well as the construction of three toll stations on new highway sections that are being built in RN Macedonia.

The Project component is consist of two separate sub-components: 1) upgrade and modernization of five existing toll stations along section Gostivar – Miladinovci and 2) construction of three toll stations, one on new built highway on Corridor VIII (sections Kicevo – Ohrid) and two on new built secondary axis of the Corridor X (section Miladinovci – Stip). Figure 3a and 3b below shows the location of this project component.



Figure 3 Location of existing toll stations on Corridor VIII



Figure 4 Three toll stations on new highway sections

(1) Following existing toll stations along Corridor VIII (section Miladinovci – Gostivar) will have upgrade and modernization to operate with automatic ETC system:

- Miladinovci toll station;
- Glumovo toll station;
- Zelino toll station;
- Tetovo toll station;
- Gostivar toll station.

The Project component represents follow up on upgrading and modernization activities already performed. The booths of each toll station has already been replaced as well as the electrical and the mechanical part. This project component covers activities for change of eaves and complete tolling equipment on each toll station.



As result, the upgraded and modernized toll stations will be equipped with automatic ETC connected to the main toll operating center in Skopje. It has been understood that the upgrade and modernization of existing toll stations on Corridor VIII should follow the general project requirements for the already executed project by PESR "Construction and installation of the electronic toll collection system at the toll station Romanovce". This project component does not require construction nor environmental permitting.

(ii) Construction of three toll stations on new highway sections that are being built in NR Macedonia

This part of the Project consists of construction of three new toll stations on recently built highway sections to operate with automatic ETC systems. It includes the following toll stations:

- Toll station Arbinovo on the Corridor VIII (section Kicevo – Ohrid);
- Toll stations Preod and Kadrifakovo on the secondary axis of the Corridor X (section Miladinovci – Stip).

According the available documents construction permitting processes for all three toll stations Arbinovo, Preod and Kadrifakovo are completed. Notification letters have been issued from MoEPP on request of PESR stating that the construction of toll stations are not subject to environmental impact assessment at any level (elaborate or full study), according to the national environmental legislation. The land acquisition is completed for the toll stations Preod and Kadrifakovo while for the toll station Arbinovo it is not completed yet, however it is in developed stage, detailed information is presented in LARF. After being built and in full operation the new toll stations will be equipped with automatic ETC connected to the main toll operation center in Skopje.

It has been understood that the Corridor VIII should follow the general project requirements for the already executed project by PESR "Construction and installation of the electronic toll collection system at the toll station Romanovce".

(iii) The installation of equipment to link the upgraded and new toll stations to the toll operation center in Skopje

This project component provides basis for instalment of additional equipment in the toll operation center in Skopje – toll station Petrovec. In general, the Project consist of procurement and having in operation of hardware and software equipment. As result, linking of the new ETC systems along the Corridor VIII and along the secondary axis of the Corridor X to the tool operation centre will occur, to monitor the operation of all toll stations. This project component does not include any construction activities, therefore no environmental impacts are anticipated. Figure 4 below shows the location of the toll operation center in Skopje-toll station Petrovec.

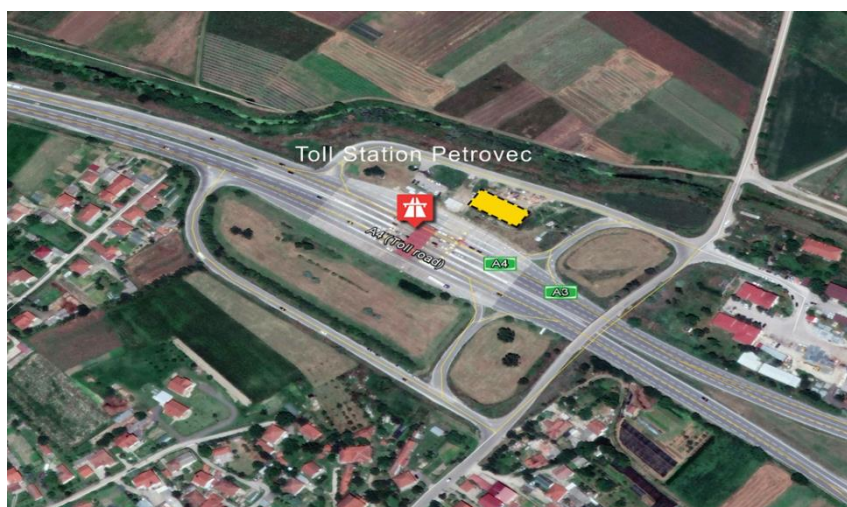


Figure 5 Toll operating center – toll station Petrovec



(iv) The construction of an additional lane to increase the capacity of the Miladinovci toll station on the Corridor VIII

This part of the project component envisages the construction of an additional lane to increase the capacity of the Miladinovci toll station on the Corridor VIII (on the right side of the direction Miladinovci-Skopje). The toll station represents a main highway interchange connecting the Corridor X (section Kumanovo – Veles – Gevgelija), newly build secondary axis of the Corridor X (section Miladinovci – Stip) and Corridor VIII (section Gostivar – Skopje – Miladinovci). Figure 5 below shows the location of the toll station Miladinovci.



Figure 6 Location of the toll station Miladinovci

This project is aligned with National Strategy for Transport (2018-20130) and Yearly Programm for construction, reconstruction, rehabilitation, maintenance, and protection of state road, 2019 which promotes regional transport integration and supports the development of strategic connections with neighbouring countries.

Project documentation for this project component has not been developed yet. It will include development of appropriate documentation for obtaining all relevant permits for construction of an additional lane to the toll station.

PESR is developing documentation for selection of Contractor to execute "Supply and Install" process. It should clarify the framework for development of required documents including the permitting processes for obtaining appropriate permits.

- (ii) The installation of photo voltaic solar panels on all the existing and new toll stations that are being built on the entire motorway network in the country

The project component predicts installation of solar panels on all existing and new toll stations (total number 15). In Table 1 are presented the toll stations and Municipalities on entire motorway network in RN Macedonia.

Table 1 Toll stations on entire motorway network in RN Macedonia

	TOLL STATIONS	MUNICIPALITY	Status of the toll station
1	TS Romanovce	Kumanovo	In operation
2	TS Miladinovci	Ilinden	In operation
3	TS Petrovec	Petrovec	In operation
4	TS Glumovo	Saraj	In operation



	TOLL STATIONS	MUNICIPALITY	Status of the toll station
5	TS Zelino	Zelino	In operation
6	TS Tetovo	Tetovo	In operation
7	TS Gostivar	Gostivar	In operation
8	TS Sopot	Veles	In operation
9	TS Otovica	Veles	In operation
10	TS Gradsko	Gradsko	New build, not in operation
11	TS Preod	Sv. Nikole	Not build
12	TS Kadrifakovo	Sv. Nikole	Not build
13	TS Arbinovo	Debarca	Not build
14	TS Demir Kapija	Demir Kapija	Not build
15	TS Gevgelija	Gevgelija	Not build

In parallel to this Project, PESR is developing Ad hoc Report including a short assessment for the possibility for realization of this component. Report consist of prelaminar estimation of CAPEX and installed capacity for installation of photo voltaic over 15 toll stations and tool operating center located at toll station Petrovec. According the findings potential instalment of 610 kW will ensure production of approximately 825 MWh giving possibility to replace more than 50% of the toll stations electricity needs, which are estimated to be 1615MWh.

Findings of the Ad hoc Report will be used by PESR for development of documentation for selection of Contractor to execute "Supply and Install" process. It should clarify the framework for development of required documents including the permitting processes for obtaining appropriate permits.

Project documentation for this project component has not been developed yet. It will include development of appropriate documentation for obtaining all relevant permits for installation of photovoltaic solar panels on the all 15 existing and new toll stations.

The design and construction will be done to meet requirements of the current Macedonian design standards and the standards of EBRD.

The Project requires very limited (minimal) acquisition of land for project components (i) and (iii), which could involve economic displacement, but there are no cases where physical displacement of 'residential' structures will occur. The land acquisition process for the Project is in developed stage. This land is a mix of State and privately-owned land and most of the required land have been acquired / expropriated to date. A Land Acquisition Framework has been developed for the Project providing more detail on this topic.

PESR do not have an estimate of the numbers of workers that will be needed for construction; however, it is common for the construction workers to include some local workers. The SEP will be updated with relevant information prior to construction commencement.

Particularly important will be good traffic management during the Project construction/implementation activities of all Project components to ensure minimum traffic disruption during the works. The construction Contractor will be required to prepare and implement a Traffic Management Plan (TMP) which maintains vehicle safe access and passage of vehicles, and provides clear warning and instructions to vehicles. Engagement with affected Municipalities /communities on traffic management is required as part of the Traffic Management Plan. The TMP will be shared with emergency services, local utility companies and relevant portions of it, with the public, particularly in relation to road traffic disruptions.

The Traffic Management Plan will be part of an overarching Construction Environmental and Social Management Plan that will be developed for the Project to help ensure appropriate management of any environmental and social impacts related to the Project.



3 | LEGAL AND POLICY FRAMEWORK FOR STAKEHOLDER ENGAGEMENT

Implementation of the Project will follow the laws and regulations of the Republic of North Macedonia (RNM) as well as applicable EBRD policies and standards.

3.1 MACEDONIAN LEGAL FRAMEWORK FOR STAKEHOLDER ENGAGEMENT

Public disclosure and consultation activities are organized in connection to the preparation of project documentation and related strategic and other studies, under the following laws:

- Law on Urban and Spatial Planning (OG of RM, no. 199/14, 42/14, 44/15, 193/15, 31/16);

This law regulates the system of spatial and urban development of Macedonia, including public information and participation throughout the process of development and adoption of urban and spatial planning documents.

- Law on Environment (OG of RM, no. 53/05, 81/05, 24/07, 159/08, 83/09, 48/10, 124/10, 51/11, 123/12, 93/13, 187/13, 42/14, 44/15, 129/15, 192/15, 39/16, 99/18).

This law and its associated secondary legislation set out the requirements for undertaking environmental impact assessment of potential environmental impacts of public and private projects which are likely to have a significant impact on the environment before development consent / construction permit is granted in the form of approval for project implementation.

In accordance with the Law on the Environment, when an intended project may have a significant impact on the environment in another country, the state authority responsible for environmental protection issues shall promptly submit to another state the information concerning the project, together with all available data on its possible impacts; the nature of the decision that may be adopted; and, the period within which another state can announce its intention to participate in the impact assessment procedure.

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

- The Law on Construction (OG of RM no. 130/09, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 70/13, 79/13, 137/13, 150/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 35/18, 64/18).
- The Law on Expropriation (OG of RM no. 95/12, 131/12, 24/13, 27/14, 104/15, 192/15, 23/16). Under the Macedonian legal framework relating to expropriation affected land owners and users with legal rights must be consulted. Affected owners of properties are individually invited to a hearing and notified about the submission of the Proposal for Expropriation and the proposed compensation amount.
- The Law on Access to Public Information (OG of RM no. 13/06, 86/08, 06/10, 42/14, 148/15).
- The Law on Acting upon Complaints and Proposals (OG of RM no. 82/08, 13/13, 156/15, 193/15).
- Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, 1998 (Macedonia accessed 22 July 1999).

3.2 EBRD'S POLICY FOR STAKEHOLDER ENGAGEMENT

The EBRD is committed to promoting environmentally sound and sustainable development in accordance with its Environmental and Social Policy (2014) and the Performance Requirements (PRs) contained therein. EBRD sets out its stakeholder engagement requirements in the following documents:

- Environment and Social Policy (2014) through PR 10: Information Disclosure and Stakeholder Engagement (2014); and
- Public Information Policy (2014).



The EBRD considers public consultation and stakeholder engagement an on-going process, to be started at the earliest stage of Project planning, and to be continued throughout the entire life of the EBRD-financed project.

An essential element in the stakeholder engagement process, in order to ensure meaningful and effective consultation process, is the careful identification of all involved stakeholders and the examination of their concerns, expectations and preferences. Special attention should be paid to the identification of vulnerable stakeholders whose life and well-being is directly dependant by the Company's activities. The consultation and dialogue with these stakeholder groups needs to be planned and managed with special care.

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

4 | IDENTIFICATION OF PROJECT STAKEHOLDERS AND COMMUNICATION METHODS

The purpose of identifying stakeholders is to determine the organizations and persons who may be directly or indirectly affected (both positively and negatively) by the Project, as well as parties that may be interested in and/or have a positive or negative influence on the Project.

Stakeholder identification was initiated at the Project planning stage, on the basis of:

- Analysis of information about the affected area;
- Analyses of information about the Municipalities and communities in the Project area;
- Analyses of currently available information about owners and users of land which will be acquired for the Project;
- Consultations with representatives of local authorities;
- Analysis of and consultations with statutory organizations and agencies with responsibilities related to the Project;
- Analyses of local service providers whose assets may be affected by the project and / or who may have to provide services for the project (emergency services, fire brigades, owners and operators of public utilities, local police, etc.);
- Analysis of existing Macedonian Non-governmental organisations (NGOs) at the national and local level interested in social and environmental issues, including those that have already shown an interest in the Project through participation in meetings and communication with PESR;
- Analyses of PESR internal stakeholders (employees and their union, contractors).

Stakeholder engagement activities will be ongoing through the course of the Project's pre-construction, construction, operation and closure. Table 1 below provides an overview of stakeholders identified by PESR to date, as well as the type and method of communication which will be used with each of them and will be the responsibility of PESR, in cooperation with Contractors. Table 1 will be periodically updated to include any newly identified stakeholders as well as planned engagement activities and timeframes. Annex 4 provides further detail of when each of these methods of communication will be used.

Table 2 Identification of project stakeholders and communication methods

Stakeholders / Contact Details	Population	Type and Method of Communication	Timing
External stakeholders			
Project Affected People: Local Communities/ Residents of the towns and villages along the A4 highway Miladinovci-Sv.Nikole-Stip and Corridor 8 and Corridor 10		Information through the local and national media: newspaper(s), as well as electronic media	Throughout all phases of project implementation



Stakeholders / Contact Details	Population	Type and Method of Communication	Timing
Other vulnerable groups will be added as identified through the project development process.		Information about the Project (Non-Technical Summary [NTS], Environmental Protection report, Land Acquisition Framework [LAF] and SEP) published on Investor's website: www.roads.org.mk Public consultation meetings, individual meetings for directly affected PAPs with respect to land acquisition, and face to face discussions. Communication through bulletin boards at key public locations (located in affected municipalities) by posting project information/ notices; Construction signs and warnings Focus group meetings to identify impacts, agree and implement mitigation measures, project leaflets, as necessary	
Road users, interested NGOs, citizens' associations and other organisations (see Annex 2) Other interested organisations will be added, as identified throughout the life of the project.	See Annex 2	Information through the local and national media: newspaper(s) (in Macedonian), as well as electronic media Information about the Project (NTS, Environmental Protection Report, SEP and LAF) published on Investor's website Public consultation meetings, individual meetings and face to face discussions Official correspondence and meetings Signage on site	Throughout all phases of project implementation
Municipalities including all relevant departments / Centres for regional development along Corridor 8 and Corridor 10 and the A4 highway Miladinovci-Sv.Nikole-Stip		Official correspondence and regular meetings to provide information on Project progress and address any issues raised that concern local communities	Regularly throughout project implementation
Public utility companies working and responsible for the area of the project footprint - along the A4 highway Miladinovci-Sv.Nikole-Stip and Corridor 8 and Corridor 10		Official correspondence and regular meetings to provide information on Project progress and address issues that concern local communities, for example issues in relation to water supply and waste management	Regularly throughout project implementation
Emergency services, fire brigades, utility owners and operators, local		Official correspondence and meetings to prepare for and	Prior to, during construction and in operational phase



Stakeholders / Contact Details	Population	Type and Method of Communication	Timing
police responsible for the area of the project footprint		coordinate activities during construction	
Ministry of Environment and Physical Planning Plostad Presveta Bogorodica 3., 1000 Skopje Tel: 02/3225-237 Web: www.moepp.gov.mk Email: infoeko@moepp.gov.mk		Official correspondence and meetings, permit requests, site inspections	As needed throughout project implementation
Ministry of Transport and Communication Str. Dame Gruev No.6, 1000 Skopje Tel: 02/3145-497, 3123-292 Fax: 02/3126-228 Email: info@mtc.gov.mk Web: www.mtc.gov.mk		Official correspondence and meetings, permit requests	As needed throughout project implementation
Ministry of Culture, Cultural Heritage Protection Office Str. Gjuro Gjakovik, No. 61 Tel: 02/ 3240 600 Fax: 02/ 3240 561 Email: info@kultura.gov.mk Web: www.uzkn.gov.mk		Official correspondence and meetings	As needed throughout project implementation
Other ministries, as relevant: <ul style="list-style-type: none"> Ministry of Finance Ministry of Agriculture, Forestry and Water Economy Ministry of Economy Ministry of Labour & Social Policy State Labour Inspectorate 		Official correspondence and meetings	As needed throughout project implementation
Directorate for Protection of Cultural Heritage, Skopje Ul. "Pavel Shatev" no. 3 contact@uzkn.gov.mk ; http://uzkn.gov.mk/mk/ Tel: +389 2 551 7700 Institute for preserving cultural monuments and Museum, Shtip Str Kej Marsal Tito, No 2, Stip info@zavodimuzejstip.mk http://www.zavodimuzejstip.mk/ Tel: +389 32 392 044 Institute for reserving cultural monuments and Museum, Ohrid Boro Shain Street, No. 10 info@muzejohrid.mk http://muzejohrid.mk Tel:+389 (0)46 231 300		Official correspondence Consent on the Chance Finds Procedure Consent on a procedure for identification and conservation of local cultural heritage during construction. The museum has a permanent ethnological setting, library, archive and one expert.	Throughout project implementation Prior to construction Prior to construction
Internal stakeholders			



Stakeholders / Contact Details	Population	Type and Method of Communication	Timing
PESR Employees	All	Individual meetings or internal workers' meetings, monthly newsletters, the Committee on Safety at Work, bulletin boards, information from controllers and inspectors on the field regarding the following: <ul style="list-style-type: none"> human resources policy internal grievance mechanism health and safety procedures codes of conduct Environmental and social mitigation measures SEP grievance mechanism 	As needed throughout project implementation
Contractors (construction companies, subcontractors and suppliers)	Unknown at present	Official correspondence, meetings, site visits, code of conduct, information in contract on standards and expectations with respect to: <ul style="list-style-type: none"> environmental and social protection health and safety at work security access to sites interaction with communities 	During tendering and contract signature Throughout project implementation

5 | INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT PROGRAM

Project information disclosure and consultations

PESR intends to provide all relevant information to the public. All interested and affected parties will be able to find the following documents on the PESR website (www.roads.org.mk). Documents will be available in Macedonian and English language, as follows:

- Non-technical Summary
- this Stakeholder Engagement Plan including Grievance Mechanism
- Land Acquisition Framework

In addition, hard copies of these documents will be available at the following locations:

- PESR in Skopje [Dame Gruev str. 14, 1000 Skopje]
- Municipalities along Corridors 8 and 10, and A4 highway Miladinovci-Sv.Nikole-Stip where toll stations are located, and
- EBRD office in Skopje

Other disclosure and consultation activities

The Contractor will secure sites prior to any construction activities taking place and will ensure appropriate construction and warning signs are in place. Information in relation to the Grievance Mechanism will also be included.

Stakeholder engagement throughout the life of the project



PESR and the Contractor(s) engaged to undertake the Project will continue to engage with stakeholders and this Stakeholder Engagement Plan will be continually updated to reflect Project progress. Particular attention will be placed on communication with any identified vulnerable groups (through focus group meetings, project leaflets or in other appropriate ways), to ensure project impacts on them are appropriately mitigated.

Detailed information, a Program, regarding methods and timing of Stakeholder engagement can be found in Appendix 4.

6 | GRIEVANCE MECHANISM

A grievance mechanism will be adopted as presented in Figure 7.

PESR and its Contractor(s) will accept all comments and complaints associated with the Project, submitted either verbally or in writing and in accordance EBRD Project Complaint Mechanism (PCM)¹. PESR recognizes that consultation is an ongoing process, and different concerns may arise as the Project moves into the construction phase.

A sample of the Projects Public Grievance Form is provided in Annex 1. Any person or organization may send comments and/or complaints in person, by phone or via post or email using the contact information provided below.

All types of stakeholder grievances (apart from those raised by employees and contractors) relating to this Project should be channelled to PESR through the following designated staff member:

Mrs **Biljana Cvetkovikj**, Manager of Human Resources Management and General Affairs Unit

Tel: + 389 (0)2 3118-044 ext.312

Fax: + 389 (0)2 3220-535

email: biljanal@roads.org.mk

Address: **Public Enterprise for State Roads**

Dame Gruev str. 14,

1000 Skopje, Republic of North Macedonia

1.1 | ¹ The Project Complaint Mechanism (PCM) is the EBRD's accountability mechanism that has been established to assess and review complaints about Bank-financed projects. It provides individual(s) and local groups that may be directly or adversely affected by an EBRD project, as well as civil society organisations, a means of raising complaints or grievances with the Bank, independently from banking operations.

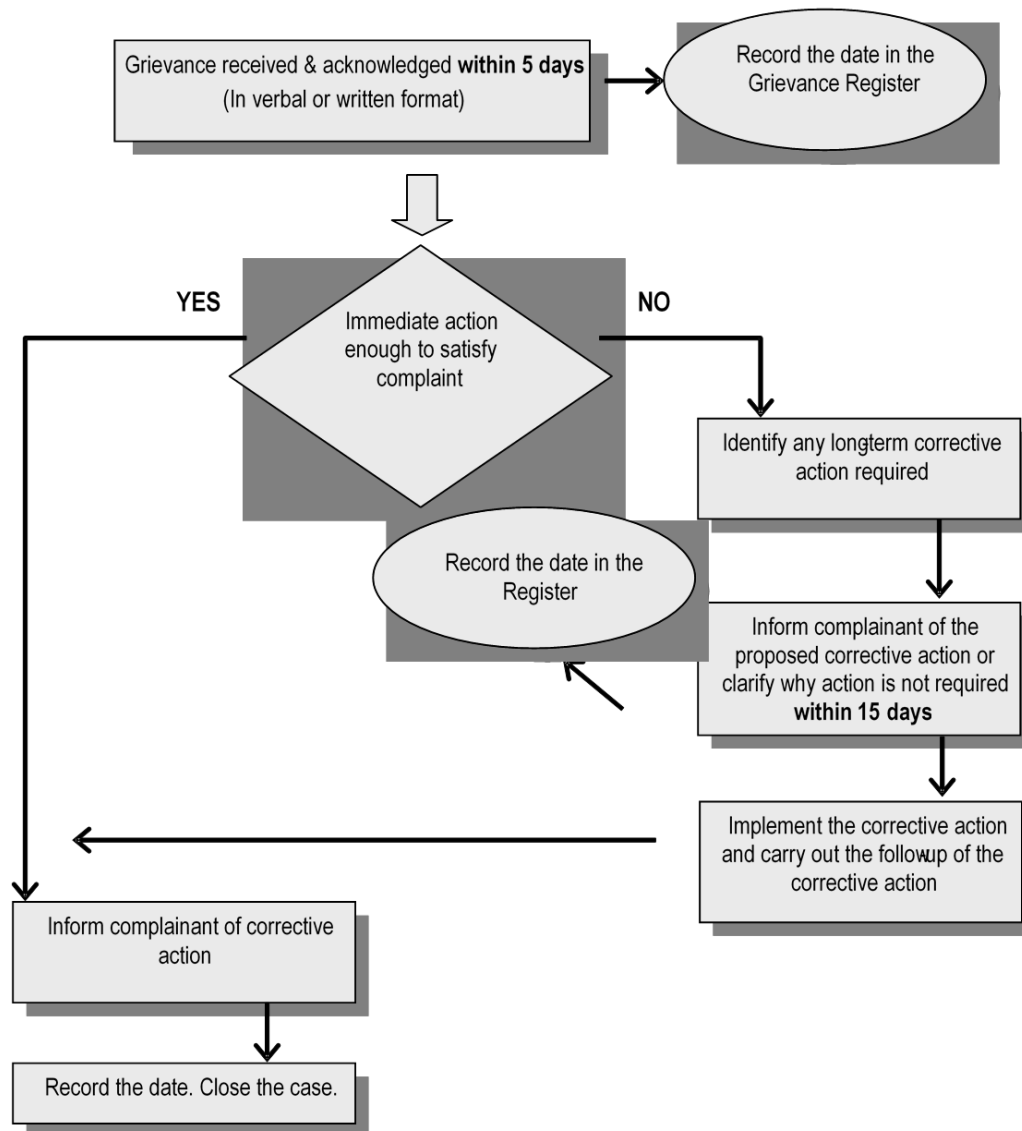


Figure 7 Grievance Mechanism

Contact details of the construction Contractor will also be made publically available in the Municipalities adjacent to the project works and included in a revised SEP, once a Contractor is appointed.

The Grievance Form (in Macedonian and English) will be made available on the web site www.roads.org.mk and the concerned municipality will receive pre-printed forms to be readily-available for the public. A worker's Grievance Mechanism will also be established for the employees of construction companies (as a separate system).

PESR will log and monitor the process of comments and complaints and the information will be summarized in annual EHSS reports, which will be prepared and posted on its website. PESR is obliged to respond to all complaints according to procedures prescribed in national legislation and this SEP.

The response time for grievances will be in accordance with national legislation for the particular issue in question. PESR will endeavour to acknowledge receipt of the Grievance within 5 working days, and to respond within 15 days of receiving the grievance to inform the complainant of the corrective action taken or proposed corrective action. Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of North Macedonia.



7 | MONITORING AND REPORTING

The SEP is a 'living document' which will be updated periodically (at least once every six months) to record consultations undertaken, issues raised, actions taken; to describe lessons learned and any changes to the consultation process; and to outline the schedule for on-going and future interaction.

The PESR employee responsible for SEP implementation (see section 10 of the SEP) and the Grievance Manager (see section 8 of the SEP) shall liaise with the relevant internal departments such as Investment and the Legal Department, together with the Construction contractors and with local communities to monitor and report on progress with respect to information dissemination on consultations, land acquisition and compensation, grievance management, social and environmental mitigation measures, health and safety issues.

PESR will conduct monitoring of SEP implementation and will, accordingly, report to EBRD on an annual basis for realized stakeholder engagement activities via Annual Environmental and Social Reports. Monitoring related to this plan (Appendix 5) will be conducted semi-annually, and updates will be provided in person or by mail to affected parties involved in the engagement process at that time, and the monitoring reports will be added to the PESR website. PESR will publish details of issues raised during the consultation process and provide appropriate feedback both on its website and place hard copies in the municipal office of Municipalities connected to footprint of the Project. Reports shall also include an update on the grievance process, with the number of grievances received and addressed/closed, most frequent types of grievances, and any recommendation or action taken to decrease the number of grievances. Preparation of the progress reports shall be the responsibility of the PESR employee responsible for SEP implementation and the Grievance Manager.

Throughout the Project, PESR will communicate with stakeholders and inform them of any significant issues, for example, changes in the Project program deadlines. PESR will provide Project updates on its website and also provide leaflets to the Municipalities connected to footprint of the Project, as necessary.

PESR will produce annual Environmental, Health and Safety, and Social (EHSS) reports, which will include a summary of the Project's performance on management of health, safety, environment and social issues.

Sample sheet of the Summary of the Monitoring report can be found in Appendix 5.



8 | CONTACT DETAILS & RESPONSIBILITY FOR SEP IMPLEMENTATION

The responsible persons in PESR for implementation of the Stakeholder Engagement Plan are:

Mr. **Joze Jovanovski**, Manager of Unit for Environment Protection and Social Aspects

Ms **Biljana Cvetkovikj**, Manager of Human Resources Management and General Affairs Unit

Tel:	+ 389 (0)2 3118-044 ext. 305 and 312
Fax:	+ 389 (0)2 3220-535
Email:	j.jovanovski@roads.org.mk biljanal@roads.gov.mk
Address:	Public Enterprise for State Roads Dame Gruev str. 14, 1000 Skopje, Republic of N. Macedonia

Information on the Project is also available at the EBRD's office in Skopje:

Address:	EBRD , Soravia Centre Skopje, VII floor, Filip II Makedonski str. 3, 1000 Skopje, Republic of N. Macedonia
Tel:	+389 2 3297 800
Fax:	+389 2 3231 238

and on the EBRD's webpage <http://www.ebrd.com>



9 | APPENDICES

Appendix 1 – Public Grievance Form

Appendix 2 – National and local NGOs and other organisations

Appendix 3 – Previous Stakeholder Engagement Activities

Appendix 4 – Proposed Stakeholder Engagement Program

Appendix 5 – Summary Monitoring Report



APPENDIX 1 – PUBLIC GRIEVANCE FORM

Public Grievance Form

Reference No:	
Name and Surname (optional) • I wish to raise my grievance anonymously. • I request not to disclose my identity without my consent.	
Contact Information: Please note how you like to be contacted (mail, phone, e-mail)	• By Post: Please provide mailing address: _____ _____ • By Phone: _____ • By E-mail _____
Preferred language for communication	• [Macedonian] • [Other: _____]
Description of Incident or Grievance: What did happen? 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 to resolve the problem? 	
Signature: _____ Date: _____	

Please return this form to:

Ms Biljana Cvetkovikj

Tel: + 389 (0)2 3118-044 ext.312

email: biljanal@roads.org.mk

Public Enterprise for State Roads

Dame Gruev str. 14

1000 Skopje, Republic of N. Macedonia



APPENDIX 2 – NATIONAL AND LOCAL NGOs AND OTHER ORGANISATIONS

Name of the organization	Contact Information
Macedonian Ecological Society	Vladimir Nazor 10, 1000 Skopje Tel: (02) 2402 773, Fax: (02)2402 774 Mob: 078 393 436 contact@mes.org.mk
The Ecologists' Movement of Macedonia – Skopje	Vasil Gorgov 39, baraka 6, 1000 Skopje Tel: (02) 3220-520 dem@dem.org.mk ruska@dem.org.mk
Centre for environmental research and information "Eko-svest" – Skopje	Blvd 11 Oktomvri 125/12, 1000 Skopje tel: (02) 3217-247 fax: (02) 3217-246 mob: 072 726-104 info@ekosvest.com.mk
Front 21/42	Orce Nikolov 83A, 1000 Skopje Tel/Fax: (02) 3122-546 mob: 075 433-231 contact@front.org.mk
Macedonian Green Centre	Kosta Novakovik 1A/19, 1000 Skopje Tel/Fax: (02) 6132-432 Mob : 078 205 217 zeleni@zeleni.org.mk
Bird Study and Protection Society of Macedonia	PMF - Gazi Baba BB, 1000 Skopje, 02/3117-055; 078/254-736 brankom@ukim.edu.mk
National federation of Farmers	Street: „ Gigo Mihajlovski " N. 4, 1/1, Skopje E-mail: nff@nff.org.mk Tel: 00 389 (0)2 3050646 / 00 389 (0)70 937132
Association for Emancipation, Solidarity and Equality of Women ESE	St. Maxim Gorki 20/1-4,1000 Skopje Tel: ++389 (0) 2 3298 295; 3298 296 esem@esem.org.mk
National Association of Persons with Disability	Str. 11 Octomvri, Skopje http://www.mobilnost.mk mobilnost@mobilnost.mk Телефон: +389 (0)2 3 211 280
Automotive Association of Republic North Macedonia	Str. Teodosij Gologanov No.51, Skopje www.amsm.mk +389 2 3181-196 ac@amsm.com.mk



Name of the organization	Contact Information
Bureau for Regional Development, Republic of North Macedonia	Street Sv.Kiril i Metodij No.20, Skopje Telephone: +389 2 3 121 350 info@brr.gov.mk



APPENDIX 3 – PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder	Date	Method	Issues	Outcomes
Ministry of Environment and Physical Planning	October 2016	Formal submission of Request for Opinion for EIA process for construction of the toll stations, Preod, Kadrifakovo and Arbinovo	Letter for Intention for the Project "Toll stations Construction"	MoEPP issued Notification letters stating that the construction of toll stations is not subject to environmental impact assessment at any level
Ministry for Transport and Communication	November 2016	Formal submission of technical and administrative documentation for toll stations Preod and TS Kadrifakovo	Approval for construction	MoTC issued Approval for Construction for TS Preot , TS Kadrifakovo and TS Arbinovo



APPENDIX 4 – PROPOSED STAKEHOLDER ENGAGEMENT PROGRAM

STAKEHOLDERS	ACTIVITY	METHOD	TIMING
Pre-construction Phase			
Municipalities and communities connected to the Project footprint: Kumanovo, Ilinden, Petrovec, Saraj, Zelino, Tetovo, Gostivar, Veles, Gradsko, Sv. Nikole, Debarca, Gevgelija	<p>Promotion of Project timeline and activities, Stakeholder Engagement Plan, Land Acquisition Framework, Non-Technical Summary and Environmental and Social Action Plan</p> <p>Separately, these stakeholders will also be engaged by the Contractor during their development of the Traffic Management Plan</p> <p>Discussion regarding traffic and safety management and measures.</p>	<p>Information through the local and national media: newspaper(s), as well as electronic media</p> <p>Disclosure of NTS, LAF and SEP on PESR website: www.roads.org.mk and by hard copy with 1week advance notification, including the municipality will receive pre-printed grievance forms to be readily-available for the public</p> <p>Public consultation meeting, individual meetings and face to face discussions</p> <p>Official correspondence</p>	<p>All: Pre-construction</p> <p>Public consultation meeting in Q3 2019, to be preceded by disclosure of the NTS, LAF and SEP by at least 1 week</p>
Project Affected People with respect to land acquisition	<p>The LAF sets out the engagement plan for consultation with affected land owners and users including the need for this to include targeted measures for vulnerable groups. The monitoring phase of the LAF extends into construction.</p> <p>The program includes taking the opportunity of the meetings for land acquisition to also plan work with the community to avoid working at sensitive times and confirm any impacts on local access during construction and operation.</p> <p>The LAF requires that consultation materials, such a pamphlets and posters on the expropriation process, and information on the Grievance Mechanism for the Project need to be prepared to support the consultation with affected persons. These will be available in Macedonian.</p>	<p>Correspondence, meetings,</p> <p>Focus group meetings with PAPs with respect to land acquisition to identify impacts, agree and implement mitigation measures, project leaflets, as necessary</p>	In line with the timeline set out in the LAF
Ministry of Environment and Physical Planning, Ministry of Transport and Communication (other Ministries to be added to this table as the need for any further communication	Remaining permit(s) acquisition and statutory reporting	Official correspondence and meetings, permit applications	No statutory requirements; proceed if the need arises



STAKEHOLDERS	ACTIVITY	METHOD	TIMING
arises – none at this time)			
Institutions for preserving cultural monuments and Museums	Chance Finds	Review and approval of the developed Chance Finds Procedure	Prior to construction commencement
Local emergency services, fire brigades, utility owners and operators, local police, public utility company	Discussion of Project plans to prepare for and coordinate activities during construction The TMP will be shared with emergency services and local utility companies. Timing of advance notice requirements to emergency services and utility companies for specific construction activities to be agreed.	Official correspondence and meetings	At least 6 weeks prior to construction commencement
Interested NGOs, citizens' associations and other organisations (see Annex 2).	Promotion of Project timeline and activities, Stakeholder Engagement Plan, Land Acquisition Framework, Non-Technical Summary and Environmental and Social Action Plan	Information through the local and national media: newspaper(s), as well as electronic media Disclosure of NTS, LAF and SEP on PESR website: www.roads.org.mk Individual meetings and official correspondence as needed (none planned at this time based on current needs)	All: Pre-construction To be preceded by disclosure of the NTS, LAF and SEP by at least 1 week
Contractors (construction companies, subcontractors and suppliers)	Contractor Engagement	Information through the local and national media: newspaper(s), as well as electronic media Tender documents (including environmental and social requirements) Official correspondence, meetings	Q3 2019
Road users	Update on Project plans and timelines	Information through the local and national media: newspaper(s), as well as electronic media Disclosure of NTS, LAF and SEP on PESR website: www.roads.org.mk	Disclosure in Q3 2019



STAKEHOLDERS	ACTIVITY	METHOD	TIMING
Construction Phase (Quarter 3 /2019 – 3/2020 – 12 months)			
Residents, businesses and Municipalities connected to the Project footprint	Promotion of Project timeline and activities, ongoing promotion of Stakeholder Engagement Plan and its implementation to date, including grievance mechanism Advertisement of employment opportunities	Information through the local and national media: newspaper(s), as well as electronic media, particularly of employment opportunities Individual meetings and face to face discussions, as needed Semi-annual stakeholder engagement monitoring reports on the PESR website, in hard copy in the municipal offices, and provided in person / by mail as needed, including details of issues raised during the consultation process, the number of grievances received and addressed/ closed, most frequent types of grievances, and any recommendation or action taken to decrease the number of grievances. Continuous communication through the bulletin boards at key public locations (located in affected municipalities) by posting project information/ notices; Construction signs and warnings Focus group meetings to identify impacts, agree and implement mitigation measures, project leaflets, as necessary, as needed (none anticipated to be needed at this time) Official correspondence as needed (none anticipated to be needed at this time)	Duration of construction
Local emergency services, fire brigades, utility owners and operators, local police, utility companies connected to Project footprint	Discussion of Project plans to continue to coordinate activities during construction Emergency services to continue to have access to the Traffic Management Plan of the Contractors	Official correspondence and meetings as needed	Throughout construction Timing of advance notice to emergency services of specific activities as agreed during pre-



STAKEHOLDERS	ACTIVITY	METHOD	TIMING
			construction meetings
Interested NGOs, citizens' associations and other organisations (see Annex 2).	Promotion of Project timeline and activities, ongoing promotion of Stakeholder Engagement Plan and its implementation to date, including grievance mechanism	Information through the local and national media: newspaper(s), as well as electronic media Semi-annual stakeholder engagement monitoring reports on the PESR website and provided in person / by mail as needed Individual meetings and correspondence as needed	Duration of construction , no specific requirements at this time
Contractors (construction companies, subcontractors and suppliers)	Project progress updates, oversight	Official correspondence, site visits, regular communication (phone, e-mail or meetings)	Throughout construction , at least monthly and up to weekly during works in or adjacent to priority biodiversity features, including all watercourse crossings
PESR employees	Employee awareness of Project requirements	Individual meetings or internal workers' meetings as needed, monthly newsletters, bulletin boards, information from managers including on the following: <ul style="list-style-type: none"> • roles and responsibilities • human resources policy • internal grievance mechanism • health and safety procedures • codes of conduct • environmental and social mitigation measures • grievance mechanism 	Throughout construction , as needed



STAKEHOLDERS	ACTIVITY	METHOD	TIMING
Road users	Update on Project plans and timelines, site-specific road instructions	Information through the local and national media: newspaper(s), as well as electronic media	Throughout construction Radio announcements on road traffic disruption 2 weeks prior to construction activities and then prior to any major changes to levels of disruption
EBRD	Project progress reporting	Annual EHSS Report	Annual
Operation Phase			
Contractor for operations	Contractor engagement	Contractual documents (including environmental and social requirements) Official correspondence, meetings	Prior to operation start
Municipalities connected to the Project footprint, interested NGOs, citizens' associations and other organisations (see Annex 2). PESR employees.	Promotion of monitoring plan and results, Operational Environmental and Social Management Plan	Disclosure of monitoring plan and results on PESR website: www.roads.org.mk Individual meetings and face to face discussions as needed Official correspondence as needed	Disclosure semi-annually for the first two years of operation
Local emergency services, fire brigades, utility owners and operators, local police, utility companies responsible for the Project footprint	Discussion of Project plans for operation and ongoing interaction as needed for operational management per the operational emergency response plan	Official correspondence and meetings as needed (none known to be required at this time)	During operation



APPENDIX 5 – SUMMARY MONITORING REPORT

Indicator	Activity / Item / Entity	Number
Grievances	<i>Received</i>	
	<i>Anonymously Received</i>	
	<i>Resolved</i>	
Bulletin Boards	<i>Total installed</i>	
	<i>Regularly served</i>	
Project information published on:	<i>Bulletin boards</i>	
	<i>Project website</i>	
	<i>Municipality website</i>	
	<i>Media website</i>	
	<i>Printed media</i>	
Meetings (presentations) held with representatives of:	<i>Local settlements</i>	
	<i>Municipality</i>	
	<i>Local businesses</i>	
	<i>NGO's</i>	
Hard copy documents for public	<i>Available locations</i>	
	<i>Available documents on site</i>	
Disclosed Project Information on	<i>Traffic issues</i>	
	<i>Public Health and Safety</i>	
	<i>Property and Housing</i>	
	<i>Business related</i>	
	<i>Stakeholder Engagement</i>	
	<i>Other issues</i>	

Monitoring report created: Date	Location	By (name and surname)

Date	Meeting for monitoring presentation	Location
Representative for:	Name and Surname	Signature
PESR		
Local Communities		
Municipality _____		
NGO: _____		
Other: _____		
Other: _____		