

BUCHAREST GLINA WWTP PHASE II (ROMANIA)

Stakeholder Engagement Plan

JUNE 2017

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GLOSSARY

AF – Application Form for EU Funds
ANB – Apa Nova Bucharest
ANCAB - Apa Nova – Compania de Ape Bucuresti
ANRSC - National Regulation Authority for the Public Utilities Community Services
CRM - Community Relations Manager
EA – Environmental Authorisation
EBRD – European Bank for Reconstruction and Development
EP – Environmental Permit
EPA – Environmental Protection Agency
ESIA – Environmental and Social Impact Assessment
EU – European Union
FS – Feasibility Study
HQ - Headquarter
IDA – Intercommunity Development Association
IFI – International Finance Institutions
ISPIF - Institute for Studies & Design of Land Reclamation Projects
MoB – Municipality of Bucharest
NGO –Non-governmental Organization
PIU – Project Implementation Unit within Bucharest Municipality
PMC – Project Management Consultants
PR – Performance Requirement
SEP – Stakeholder Engagement Plan
WWTP – Waste Water Treatment Plant – Glina

Introduction

Background

Stakeholder engagement is about building and maintaining constructive relationships over time with both internal and external people who are affected by or interested in the Project, or Municipality of Bucharest (MoB) and Apa Nova Bucharest (ANB) activities. It is an on-going process between MoB / ANB and its Project stakeholders that extends throughout the life of the Project and encompasses a range of activities and approaches, from information sharing and consultation, to participation, negotiation, and formation of partnerships.

The purpose of the Stakeholder Engagement Plan (SEP) is to describe the strategy and program for engaging with stakeholders in a culturally appropriate manner (whether it be for the Project only or for entire range of activities). The goal is to ensure the timely provision of relevant and understandable information and to create a process that provides opportunities for all stakeholders, including those who are vulnerable and/or socially excluded, to express their views and concerns, and allows MoB / ANB to consider and respond to them.

The following sections provide:

- Brief description of the company and the current project;
- The regulatory requirements for consultations;
- Summary of our previous stakeholder engagement activities;
- Identification of key stakeholders;
- Proposed information and stakeholder engagement plan;
- Proposed public grievance mechanism; and
- Contact information.

The current document is developed by the representatives of MoB in the context of the existing project, that aims at the rehabilitation of the sewage network in Bucharest and finalization of the existing Waste Water Treatment Plan (WWTP). The current SEP is developed based on International Finance Institutions (IFI) requirements (specifically requirements from the European Bank for Reconstruction and Development (EBRD) for Category A projects. This means that the documents need to be more comprehensive and to include additional details about the engagement actions needed to be carried out during the entire lifecycle of the projects - starting with early stages of project implementation (scoping phase). Since the construction works that are included in this project are coordinated by the MoB, whilst the operation of the sewerage network and the WWTP is under the responsibility of ANB, the current SEP focuses on both these entities. MoB and ANB are the key stakeholders that organise the engagement actions, one during construction (MoB) and the other during operation (ANB).

Project summary

The project “Finalisation of Glina WWTP, rehabilitation of the main sewer collectors and of Dambovita sewer collector canal (CASETA)”, Bucharest Municipality, Romania. The project consists in the extension and rehabilitation of the wastewater infrastructure in Bucharest city. The beneficiary of the project is MoB.

Bucharest is located in Bucharest-Ilfov Development Region of Romania and is surrounded by Ilfov County. The city surface is about 228 km². The city is located on the banks of Dambovita River, which is one of the main tributaries of the Arges River discharging to the Danube River and ultimately to the Black Sea.

Bucharest is surrounded by a number of satellite communities located within Ilfov County. There is no clearly defined green belt around the city and much of the neighbouring urban development is contiguous with that of Bucharest. As a consequence, many of Bucharest's utilities have extended outside of the municipality boundary to serve adjacent communities.

The provision of water and wastewater services in Bucharest has been delegated to the private operator S.C. Apa Nova Bucharest S.A. (ANB), under the terms of a Concession Contract signed in 2000. After the finalisation of the construction works, the new assets will be transferred to ANB but will remain under the ownership of the Bucharest Municipality. The operation and maintenance of the new infrastructure will also fall under the responsibility of ANB, under the terms of an Addendum to the Concession Contract.

The project is the follow-up operation to Waste Water Treatment Plant (WWTP) Glina, Phase 1, completed in 2011. Phase 2 of the Glina WWTP and the sludge incinerator will be constructed in direct connection to the existing WWTP Phase 1, which is now in function. Glina WWTP is situated south-east of the Bucharest, on the right bank of Dambovitza River, inside an area of the Glina commune designated within the General Urban Plan (PUG) as Industrial Zone and has the following vicinities:

- north - the Dambovitza River canal and the formerly proposed Bucharest Inland Harbour;
- east - pastures and other agricultural land;
- south - the Glina Village residential area and the landfill "Ochiul Boului" to south-west;
- west - a wholesale store for consumer goods, the pilot wastewater treatment plant, the PROTAN factory (which includes an animal waste incinerator), while to north-west - the Thermo-Electric Power Plant.

The below figure presents the location of the WWTP.

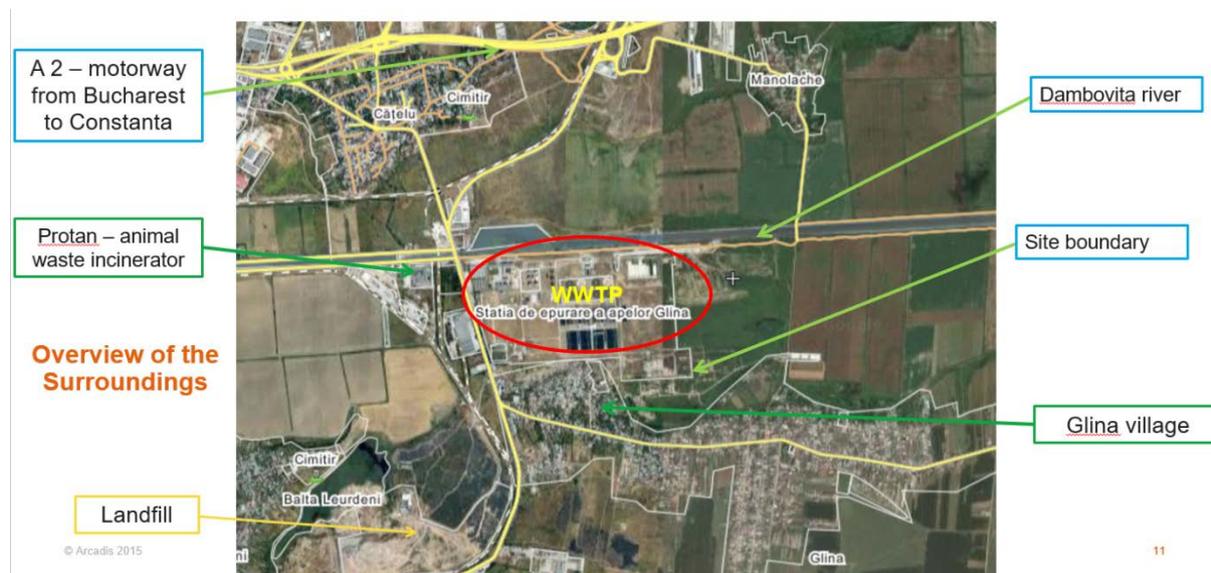


Figure 1. The location of the WWTP and the existing infrastructure situated nearby

The works at the WWTP in Bucharest started in 2007 under the ISPA Programme (Instrument for Structural Policies for Pre-Accession). According to the Financing Memorandum, it was decided, at that time, to split the works in two phases:

- **Phase I** - funded under the ISPA program. This was planned to complete part of the WWTP and associated sludge treatment for a fixed flow;

- **Phase II** - to be financed under the Environmental programme (2007-2013 and 2014-2020 programming periods). This is expected to complete the project and provide appropriate full treatment for all wastewater collected as to be discharged to sensitive waters, as well as to provide final sludge handling in an incineration plant.

Stage 1: in the programming period 2007-2013 is referring to the following infrastructure works:

- Extension of Glina Wastewater Treatment Plant and construction of the sludge management facilities (sludge incinerator);
- Rehabilitation of drainage systems outlet of Tineretului, Titan and Carol Lakes and construction of Caseta's right drainage systems;
- Rehabilitation of the sewer collectors (A0 and B0).

Stage 2 the programming period 2014-2020, includes the following works:

- Rehabilitation of the main sewer collector (known as the Caseta) and its left drainage system on Ciurel - Vitan sectors;
 - Lot 1 Rehabilitation of the main sewer collector (known as the Caseta) and its left drainage system on Ciurel - Unirii sector
 - Lot 2 Rehabilitation of the main sewer collector (known as the Caseta) and its left drainage system on Unirii - Vitan sector
- Rehabilitation of the main sewer collector (known as the Caseta) on Vitan – Glina sector;
 - Lot 1 Rehabilitation of the main sewer collector (known as the Caseta) on Vitan -NH Popesti sector
 - Lot 2 Rehabilitation of the main sewer collector (known as the Caseta) on NH Popesti - Glina sector
- Rehabilitation/replacement of the sewerage network in the areas Cotroceni, Regina Maria and Tineretului.
 - Lot 1 Rehabilitation/replacement of the sewerage network in the area Cotroceni
 - Lot 2 Rehabilitation/replacement of the sewerage network in the areas Regina Maria and Tineretului.

Regulatory requirements

National legislation requirements and internal requirements for engagement

At national level, there are no specific requirements for preparing a dedicated Stakeholder Engagement Plan. Nevertheless, some provisions for stakeholder engagement are included in several regulations and procedures, including:

- *The Romanian Constitution*, which stipulates in article 31 (1) that “a person's right of access to any information of public interest cannot be restricted” and in article 31 (2) that “the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest”;
- *Law no. 86/2000* ratifying the United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998 (Aarhus Convention).
- *Law no. 544/2011* regarding the free access to information of public interest. Defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania. Stipulates that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of the department for public relations or through the intermediary of the person appointed for this purpose.
- *Governmental Decision no. 878/2005* on right to access to environmental information (GD no. 878/2005) - which transposes the EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive 90/313/CEE), and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- *Emergency Government Ordinance no. 195/2005 on environmental protection* stipulates in Article 5 that the state recognizes the right of any person to an “ecologically healthy and balanced environment” and for this purpose, the state warrants, inter alia, free access to environment related information, including the right of any person to be consulted during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice – it stipulates in Article 20 that the Competent Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;
- *Governmental Decision no. 445/2009 on environmental impact assessment* pertaining to certain public and private projects (GD no. 445/2009) – which transposes the EIA Directive 85/337/EEC, and the Directive 2003/35/EC providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice - stipulates that the relevant information has to be made publicly available by the Investor and/or the National Authorities during each of the EIA stages listed in article 6 of GD. no. 445/2009. Public Consultations and open disclosure of documentation connected with the Project have to be carried out and financed by the Investor in close connection with the guidance given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, art. 16 of GD. no. 445/2009).
- *Order no. 135/2010 approving the Methodology for the application of the environmental impact assessment for public and private projects* (Order no. 135/2010) - a joint document issued by the Ministry of Environment and Forests, Ministry of Administration

and Internal Affairs, Ministry of Agriculture and Rural Development and Ministry of Regional Development and Tourism, as published in the Official Gazette no. 274/24.04.2010.

- *Order no. 2701/2010* approving the Methodology for the information and consultation of the public regarding the development or revising of the spatial planning of the territory and zoning plans- provides the legal framework for performing the information disclosure and public consultation as a prerequisite for approving any urbanism and zonal planning documents.
- *Law no. 52/2003* on decisional transparency in public administration has the role to enhance the accountability of government to the citizen and the beneficiary of the administrative decision, and to increase the involvement of citizens in decision-making processes of the administrative and legislative drafting process, to enhance transparency across government.
- *Order no. 863/2002* approving the Methodological guides applicable to the stages of the environmental impact assessment framework procedure.
- Based on the license issued by the National Regulation Authority for the Public Utilities Community Services (ANRSC), ANB is entitled to deliver water supply and sewerage services and authorised to operate the public water supply and sewerage system within the administrative area of the MoB.
- ANB carried out its business subject to the requirements set out in the Government Decision no. 745/2007 approving the Rules for awarding the licenses for public utilities community services.
- ANB holds the class 1 license no. 2435/29.04.2013 issued by the relevant authority ANRSC, by the Order of the ANRSC Chairman no. 207/29.04.2013. The maximum validity of the license held by Apa Nova București and permitted by the Government Decision no. 745/2007 is 5 years.
- Also, ANB is implementing a Triple Integrated Management System (Quality, Environmental and Occupational Safety and Health) for its water supply and wastewater collection and treatment services. The Triple Integrated Management System is based on ISO 9001:2008 (Quality); ISO 14001:2004 (Environmental) and OHSAS 18001:2007 (Occupational Safety and Health). The system is under the responsibility of the Quality Assurance-Environment-Occupational Health and Safety department, which is divided into three services for each of its functions.
- The company fully respects the legal requirements for public disclosure (Law 544/2001) regarding the free access to the public information.

International best practice requirements

The MoB and ANB are committed to follow the international best practices in the field of stakeholders' engagement. The present project is under the governance of EBRD's Environmental and Social Policy of 2014 and the applicable Performance Requirements, specifically PR 10 – Information Disclosure and Stakeholders Engagement.

The EBRD sees stakeholder engagement as important for building strong, constructive and responsive relationships with all interested and impacted persons/institutions. EBRD's Performance Requirement 10 (PR10) states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project.

In the event that national laws are insufficient or there are significant discrepancies between national and PR 10 provisions, then the following principles should be considered:

- Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation;

- The involvement of the stakeholders has to be adapted on the basis of their status, level of influence and interest towards the project. For “vulnerable groups”¹, specific actions will be considered to eliminate possible barriers to their participation in the engagement process;
- The involvement of stakeholders is a process which must take place in the early stages of the project, **and continue throughout the entire life of the project**; and
- Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.

EBRD’s Performance Requirement 1 (PR1 – Assessment and Management of Environmental and Social Impacts and Issues), together with PR10, makes it clear that engagement with the project stakeholders is an integral part of the process of assessing the potential environmental and social impacts and issues associated with the project, and developing and implementing procedures for managing and monitoring these impacts and issues (i.e., in the present case, the ESIA process).

PR1 requires the identification of the project’s stakeholders and the design of a plan for engaging with the stakeholders in a meaningful manner, to take their views and concerns into consideration in planning, implementing and operating the project. PR10 states that the process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project. In particular, Clause 22 notes that the client will engage in a scoping process with interested parties and identified stakeholders at an early stage of the ESIA process to ensure identification of key issues to be assessed as part of the ESIA. As part of the scoping process, stakeholders should be able to provide comments and recommendation on a draft SEP and other scoping documents.

¹ Defined in Section “Identification of stakeholders”

Summary of previous stakeholder engagement activities

Both the MoB and the Operator (ANB) have been implementing several engagement activities within the context of this project.

The MoB currently engages with its stakeholders in a number of ways as outlined in its Communication Strategy, customer service and partnership protocols with other entities. The following actions have already been implemented by the MoB:

➤ Public Relations

Regarding the public relations and project publicity, MoB has contracted an external consultant, SC AECOM INGINERIA SRL-SC ROM CAPITAL INVEST SA Association. The external consultant elaborated a Publicity Action Plan, in 2012, and started to implement a Communication and Publicity Strategy, in 2013.

The specific objectives of the Publicity Action Plan, regarding project publicity, were:

- Increasing citizens' awareness about the benefits of an efficient sewage collection/treatment system;
- Informing the beneficiary population about non-refundable financial assistance EU grant;
- Informing the population about the project measures, costs and benefits to ensure transparency;
- Increasing consumers' availability to pay the appropriate tariffs for the new improved services;
- Informing the target group about the possibility of being affected by the project works;
- Reducing the potential negative effects related with certain aspects of the project: municipal waste water tax, works location, works effect on road traffic, etc.;
- Population awareness regarding the discharging of waste water into the Bucharest sewerage system;
- Changing people opinion regarding environmental protection issues.

The main target groups for the Project Promotional Campaign were:

- Urban and rural population living in the project affected communities: Bucharest, Glina, Popești-Leordeni, Jilava, Chiajna, Chitila, Mogoșoaia, Voluntari - Găneasa, Dobroești, Pantelimon, Cernica, Căldăraru și Tânganu and Henri Coanda Airport;
- Pupils, teachers from schools and high schools and students;
- NGO's specialized on environmental issues;
- Mass-media.

According to the Publicity Action Plan, the project uses a personalised logo and an advertising slogan in order to increase its visibility.



Grijă pentru apă, respect pentru viață

Figure 2. Personal logo for the project

The Communication and Publicity Strategy has foreseen actions such as:

- Information campaigns about the project activities, project phases, potential impacts and mitigation measures;
- Development of a dedicated project website (currently under development, aiming at being finalized in 1 month);
- Preparation of information materials;
- Posting information boards;
- Special events where the activity of the WWTP to be presented and directly observed by students;
- Development of a Facebook page for the project where daily posts to announce the progress of the work.

The Communication and Publicity Strategy states that there is a need to engage with local communities around the WWTP so that they understand the proposed investments and to prepare them for the new tariff policy. The strategy acknowledges the role of local authorities in communicating with all the locals but does not specify the way engagement will be adapted for local needs.

Also, the external consultant carried out, periodically, reports regarding the implementation level of the Annual Action Plan on information and promotion measures. The last report was carried out in July - December 2016.

Up till now, the external consultants that were contracted for implementing the Communication Strategy have performed most of the activities foreseen for this project. Unfortunately, due to the constant delays in contracting, their work was also delayed. Their contract is due to finish in September 2017, but most probably this will be extended so that they could ensure proper stakeholder engagement up till the full completion of this project.

ANB has also carried out several actions aimed to strengthen public dialogue and in 2016 launched a rebranding campaign in order to promote all the services it offers. The company, now called Apa Nova – The Bucharest Waters Company (Apa Nova – Compania de Ape ANCAB) organized the first public debate on utilities in Romania, with more than 1,500 participants and is intending to keep the public dialogue an open process and is taking measures to ensure the transparency of its services to the general public.

In March 2017, several Romanian bloggers visited the WWTP and published very positive reviews on social media. They have understood how this WWTP works and the benefits of this project such as: contribution to minimising the surface water pollution and associated potential negative impacts on ecosystems.

The bloggers have also published positive reviews in relation to ANB. These were related to the fact that ANB is a pro eco company (producing more than 55% of the total needed energy for consumption) and to the rebranding campaign considered to be useful in promoting all their services. They understood that beside the water supply service, ANB provides additional services such as industrial water supply, rainwater and wastewater collection. Moreover, ANB manages more than 127 snow collection manholes, an aspect considered to be useful during wintertime.

The project has strong visibility in the media, as it is the one of the most important environmental projects to be implemented in Romania so far. It also has important political implications, especially as the implementer (MoB) is a public entity and the monetary value of the project is considerable. As such, stakeholder engagement is a sensitive aspect which the Project Implementation Unit (PIU) acknowledges as being very important to be carried out in an appropriate manner.

As mentioned above, a Facebook page was developed in project purposes, but this page should be continuously updated. Currently, the last information published on this page is dated December 2013. Also, there is another active Facebook page for local grievance on odour from the current WWTP.

The page was created in March 2016 when several posts were published. The page doesn't seem to be active since July 2016, when the last post related to the smell coming from the plant was published.

➤ **Customer Relations**

The relationship that ANB establishes with its customers is well-balanced, fair and transparent, based on dialogue and proximity policy. Communication with the customers may be performed directly (counters, registry, and meetings), or indirectly by mail and telephonic dispatch. Also, Apa Nova Bucharest provides a convenient option to receive details about the water supply and/or sewage invoice directly to customers' mobile phone.

The website provides an interface (a form) for customers to address their opinions and complaints. Also, the website provides a program (*IDEEA CLIENT*) for customers to address their opinions and suggestions regarding the improvement of customer relationship. A committee which includes clients, ANB personnel and associations representing customer's interests, analyses these suggestions each month and the results of the opinions' evaluation are made available for the public on the company official website, <http://www.apanovabucuresti.ro>.

Customers can contact the Company 24 hours a day if there is any emergency or incidents they want to report, such as: water shortages, low pressure, cloudy water, broken pipes, channel congestion, faulty meters, etc.

Other stakeholder engagement actions include a children's section with water-related games and quizzes on ANB's website, as well as a "Useful information" page in which FAQ are answered and information is provided on a series of subjects of interest, including tariffs and tariff establishing procedure.

➤ **Project EIA**

During the execution of the EIA, the following stakeholders have been identified:

- *Governmental organisations:*
 - Ministry of Waters and Environmental Protection;
 - Bucharest Municipality;
 - Bucharest Environment Protection Agency;
 - Apele Romane;
 - Ilfov County;
 - Calarasi County.
- *Others:*
 - The Regional Environmental Centre for Central and Eastern Europe, Country office Romania - Discussions have been held with the representatives of REC Romania. They stressed the importance of this project;
 - Institute for Studies & Design of Land Reclamation Projects (ISPIF);
 - Unesco Pro Natural
 - Ecosens (to be contacted);
 - The community of Glina Village;
 - Villages and communities downstream Dambovită river.

The Regulatory Authority, EPA Ilfov, has also undertaken the required public information and consultation regarding the Environmental Report. The public was consulted at all phases of the environmental appraisal, and no objections or observations were raised against the procedure.

Consultation was based on the following process: announcements in newspapers, EPA`s Ilfov website, on the company`s website, were made with regard to the environmental agreement process and the public was invited to express their opinion and/or concerns in writing at the MoB office.

Whilst this has not occurred in a systematic manner to date, as part of this SEP, MoB and ANB are proposing to develop and maintain an internal registry document to track all comments raised in meetings and public consultations carried out during project preparation and implementation. This register will be used as a tool in managing stakeholder engagement and it will contain information about previous and future meetings/ public consultations. An indicative template is provided in the below table:

Table 1. Internal Registry for public consultations and direct meetings with stakeholders

Engagement Activity undertaken	Date	Purpose and information presented	Location	Attendees	Instruments used	Outcomes	Follow up
Public consultation sessions							
Direct meetings							

Identification of stakeholders

The following list presents a summary of stakeholders identified during the preparation of this SEP:

Internal Stakeholders

- **MoB**– MoB has established a Project Implementation Unit (PIU) at the level of Technical Department. The PIU has 7 employees; PIU consults with ANB on technical aspects related to the project in the contracting/construction process. Construction works that are included in this project are coordinated by the MoB, whilst the operation of the sewerage network and the WWTP is under the responsibility of ANB.
- **ANB employees** – A total of 2000 employees are currently employed by ANB (September 2012), out of which 150 represents managing staff;
- **ANB shareholders** – Bucharest Municipality holding 16.31% of the company's share capital, Veolia Eau-Compagnie Generale Des Eaux holding 73.69% and the company employees holding 10% through their Association;
- **Labour Union** – both employees of MoB and ANB are members of different labour unions. They have signed a collective work agreement with representatives of MoB and ANB respectively.

External Stakeholders

- **Customers/consumers** – they are divided into household users, economic agents and public institutions and are directly affected by the company's activities and investment programmes.
- **Members of local communities situated nearby the WWTP of Glina**
- **Vulnerable groups** – groups of individuals identified which may need special attention and who may not engage without special assistance. Potential vulnerable groups affected by the construction and operation include: low-income families, elderly people, families with more than three children and low income, unemployed people, people transiting to school/work.
- **Bucharest-Ilfov Intercommunity Development Association** – Established in 2008 as a Romanian legal entity, the purpose of the Association is to prepare and promote at all levels, regional development projects that are of common interest for the two territorial and administrative units, in the field of social services, transportation, environment, the business environment and tourism. The association also gets involved in obtaining the internal and external financing necessary for the implementation of such projects, in order to implement development projects important at local or regional level, or in order to supply public services and buy equipment for the emergency situation intervention;
- **National and Local authorities:**
 - Ministry of Environment, Directorate General for Environment Management Authority- inspection of technical management, financial and administrative process of implementing the project, inform the beneficiary of any decision which may affect the project and checks whenever necessary, the missions on the ground that the expenditure declared by the beneficiaries for operations are real, it has actually been incurred and complies with EU and national legislation;
 - State Construction Inspectorate is the authority that monitors the implementation of legislation on the quality of the investments, present at all levels of construction (exercise state control in the construction discipline);
 - Romanian Waters National Administration;
 - Department of Public Health Bucharest;
 - Emergency Inspectorate;
 - Institute for Studies & Design of Land Reclamation Projects (ISPIF);
 - Ministry of Waters and Forests.

- **Non-governmental organisation (NGOs)** – active both at national and/or regional/local level that are working in the fields of environmental protection, gender equality and social protection, forestry, nature conservation and agriculture. According to the Communication and publicity strategy, prepared by SC AECOM INGENIERIA SRL – SC ROM CAPITAL INVEST SA, the following NGO were identified: REC, Greenpeace CEE Romania Bucharest, Mare Nostrum Constanța, Save the Danube and the Delta Association, ViitorPlus- Sustainable Development Association, Green Generation Bucharest, “Mai Mult Verde” Association Bucharest.
- **Mass-Media**
- **Lenders** – EBRD and other financial institutions.
- **Other stakeholders**, such as providers of utilities (gas, electricity, telephones, water and sewer).

Disclosure of information and stakeholder engagement plan

One of the key aspects of engagement is to provide information to the stakeholders in a manner that they are most comfortable with and by methods they are likely to use. The table below presents the engagement methods with each category of identified stakeholders and the recommended type of information for providing to each stakeholder. The table is focusing on the construction period of the project.

The SEP should be updated yearly and correlated with the project activities and progress. Once the construction period is completed, the SEP should be transferred to ANB and updated based on the operation activities.

The future technical assistance contract will cover / ensure the implementation of the SEP.

In order to support / ensure the implementation of the Communication Strategy (part of the stakeholder engagement activities), the MoB should, timely (in a way that does not interrupt the current contract), extend the validity of the technical assistance contract that incorporates the implementation of this strategy.

The communication tools that may be used in the project context include:

- **The project website** shall be constantly updated as a way to disseminate relevant information about the project, throughout construction and operations.
- **A Community Relations Manager (CRM)** shall be appointed and trained within the MoB, in order to provide resources and clarify the responsibilities for ensuring consistency and proper management of social / community aspects associated with the Project (before construction starts).
- **Annual open house or facility tour** shall be organized for the general public in order to make them understand how the WWTP works and how the project is implemented on-site.
- **News Releases** through newspapers and website to provide updated information on the overall Project.
- **Annual report on environment, health and safety, and social initiatives** published on the project website.
- **Maps** of the WWTP location and of the rehabilitated sewage network.
- **Project Information Brochures, Leaflets, Posters, Presentations** outlining the Project description, construction methods, impacts (positive and negative), rehabilitated sewage network route. These shall include contact information on how to raise complaints or grievances.

Stakeholders	Engagement Method	Type of information provided	Purpose	Location	Period Start Date Month/Year
Employees and Labour Unions	Inform via internal communication channels (intranet, announcements, Company's internal rules Complaints Box, special events)	<ul style="list-style-type: none"> - Collective Work Contract - Staff grievance mechanism - Identifying possible Project implementation irregularities 	<p>Provide correct and timely data about project implementation</p> <p>Improved working environment for employees</p> <p>Reduce risks associated with misperceptions or misinterpretations of company's actions</p>	MoB and ANB headquarters (HQ) and local agencies	On-going/when needed
	Consult the key employees (heads of departments via direct meetings) and representatives of Labour Union	<ul style="list-style-type: none"> - Information over the project and other developments within the Company 	<p>Integrated management approach, make use of internal know-how</p> <p>Increase efficiency of internal resource management</p>	MoB / ANB HQ	Twice per year/ on demand
ANB Shareholders	Inform, consult, involve in strategic decision-making processes via constant reporting on project implementation status, annual reports and direct meetings and shareholders board meetings	<ul style="list-style-type: none"> - All reports and official documents - Project development status 	<p>Accountability to the shareholders</p> <p>Assure that their interests are well represented</p> <p>Strategic decisions are easily achieved</p>	Shareholders HQ	On-going
Bucharest-Ifov Intercommunity Development Association members	Inform, consult and cooperate on developing the best solutions for water and wastewater management at local and regional level via meetings with IDA representatives and board, reports and official communication channels	<ul style="list-style-type: none"> - Annual Report including environmental and social aspects - Project development status - Tariff structure 	<p>Achievement of all the objectives for integrated water and waste water management system at regional level</p> <p>Improved water and waste water management services</p>	IDA and company's HQ	On-going

Stakeholders	Engagement Method	Type of information provided	Purpose	Location	Period Start Date Month/Year
Customers / Local communities	Inform the clients / local communities via announcement in local media and other special events	<ul style="list-style-type: none"> - Annual Report including environmental and social aspects - Project development status including works status and possible disturbance affecting the communities 	<p>Provide correct and timely data about project implementation</p> <p>Reduce risks associated with misperceptions or misinterpretations of company's</p>	Local communities	Whenever needed, according to project communication strategy
	Inform the customers / local communities about the tariffing plan via information notes, participation at community level meetings and mass media	<ul style="list-style-type: none"> - Tariff structure and level 	<p>Increase awareness about tariffs and what people are paying for</p> <p>Increase transparency of the company</p> <p>Reduce risks associated with misperceptions about tariffs</p>	Local communities	Six months prior to stating the operation
	Consult the customers/local communities about their views/opinion on project implementation and quality of services provided via grievance mechanism	<ul style="list-style-type: none"> - Public grievance mechanism - Identifying possible Project implementation irregularities - survey about public perception of WWTP operation 	<p>Increase client' satisfaction</p> <p>Identify client's / local communities' opinion on project implementation</p> <p>Reduce risks associated with misperceptions</p>	MoB / ANB HQ and local agencies	On-going. At least one survey in two years where to evaluate the way representatives of local communities are perceiving the WWTP operation.
	Inform and consult about the project implementation status and obtain their support in project implementation via direct meetings and public debates	<ul style="list-style-type: none"> - Project development status - Identifying possible Project implementation irregularities 	<p>Provide correct and timely data about project implementation</p> <p>Reduce risks associated with misperceptions or misinterpretations of company's</p>	Local communities	Whenever needed

Stakeholders	Engagement Method	Type of information provided	Purpose	Location	Period Start Date Month/Year
Vulnerable groups	Inform and consult about the project implementation status and obtain their support in project implementation via direct meetings and public debates	- Project development status - Identifying possible Project implementation irregularities	Provide correct and timely data about project implementation Reduce risks associated with misperceptions or misinterpretations of company's	Local communities where vulnerable groups are identified	Whenever needed
	Inform and consult about tariffing plan via information notes, participation at community level meetings and mass media	- Tariff structure and level	Increase awareness about tariffs and what people are paying for Increase transparency of the company Reduce risks associated with misperceptions about tariffs	Local communities where vulnerable groups are identified	Six months prior to starting the operation
National and local authorities	Inform and consult about the project implementation status and obtain relevant permits when needed via official information notes and reporting	- Project development status - Identifying possible Project implementation irregularities	Assure effective institutional cooperation Obtain relevant permits and fulfil legal requirements	MoB / ANB HQ	On-going
NGOs	Inform and consult about the project implementation status and obtain their support in project implementation via direct meetings and public debates	- project development status	Assure that all environmental and social standards are met	MoB / ANB HQ or NGO HQ	On-going / on demand
Mass-Media	Releases and media announcements, public consultation sessions	-project development status -period of time of the public consultations sessions -results of the permitting procedure steps -decisions about the permits	Understanding the project and monitoring how all provisions are complied with, especially the ones related to environment and social safeguards	Local/Regional newspapers that are accessible to residents of the impacted communities/	On-going/ when necessary

Stakeholders	Engagement Method	Type of information provided	Purpose	Location	Period Start Date Month/Year
Lenders	Reports Direct meetings	<ul style="list-style-type: none"> - project implementation status - progress reports - discussions about challenges that might interfere with construction 	Assure effective institutional cooperation	MoB / ANB HQ	Yearly / on demand
Other stakeholders	Inform about project implementation status and interferences with their activities via official information notes and mass media	<ul style="list-style-type: none"> - Annual Report including environmental and social data - Project development status including works status and possible disturbance affecting the communities - Tariff structure and level - Public grievance mechanism - Identifying possible Project implementation irregularities 	Cooperate with them for achieving common objectives Reduced cumulative impacts generated by implementation of several projects by different stakeholders in the same location	MoB / ANB HQ	On-going

Grievance Mechanism

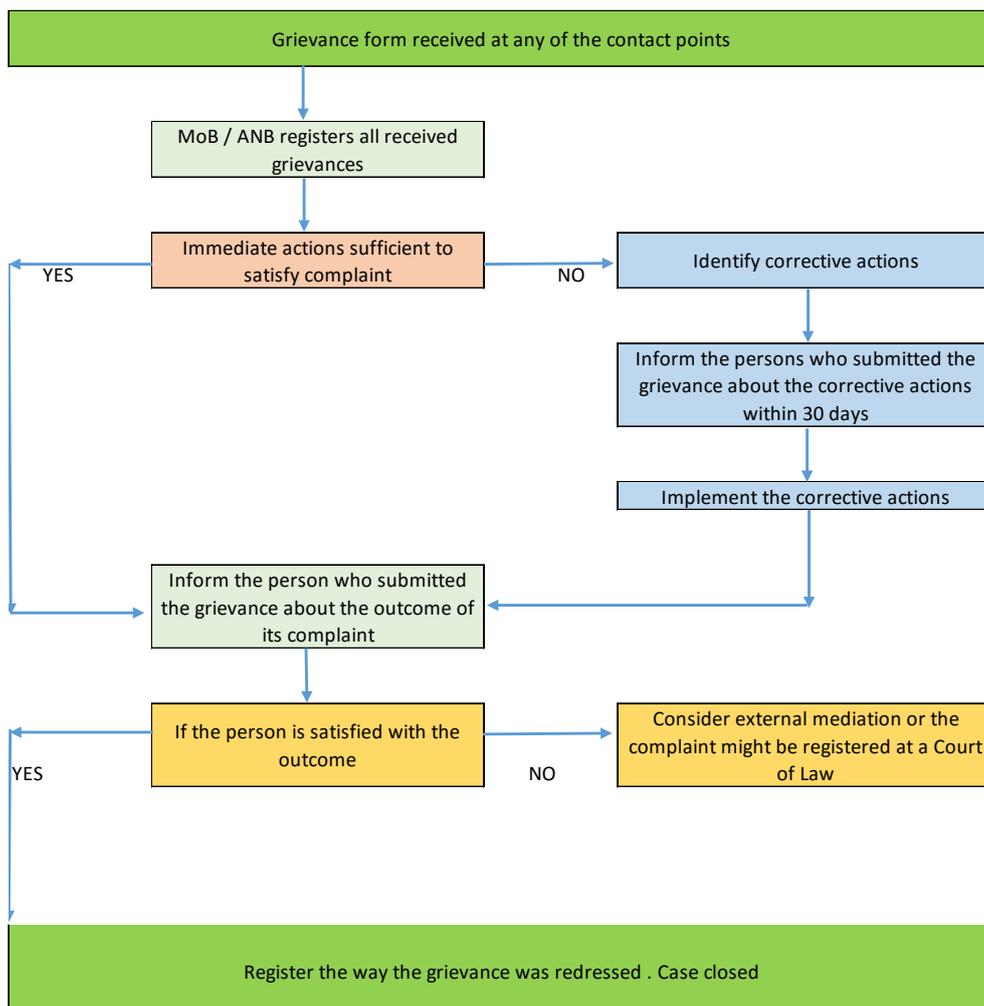
Stakeholders have the right to be informed about the project development and implementation, and also have the right to raise their concerns and suggestions during the decision-making process.

The Municipality of Bucharest has its internal grievance mechanism that allows people to address complaints and suggestions for any aspect related to their activities via:

- direct meetings with the mayor, vice-mayors and other key persons in the municipality;
- via phone – anybody can contact the representatives of municipality at the phone numbers that are available on their website - http://pmb.ro/contact/pmb/pmb_telefoane.php. At this link, the municipality presents the phone number of each department;
- via municipality website – a grievance template is available on municipality webpage at <http://pmb.ro/contact/petitie/petitie.php>
- via submitting in writing complaints directly at the municipality offices.

Apa Nova Bucharest also has a grievance mechanism, that is in line with ISO 9001.

The below grievance process flow will be applied within the context of this project. During the project construction period, all grievances should be properly registered and documented at the level of MoB. During operation stage, the grievances should be registered at ANB level. The below scheme presents the steps that should be taken when a complaint is received by MoB / ANB. A project grievance form template is presented in annex to this SEP.



The following contact points are accessible by any stakeholder at any time:

Municipality of Bucharest contact details:

Project Implementation Unit

Address: *Regina Elisabeta nr. 47, sector 5 Bucharest, Romania*

Contact person: Florina Epuras

Tel.: +40 (0) 21 302 1517

Email: Florina.Epuras@pmb.ro

APA NOVA BUCHAREST contact details:

Address: Str. Aristide Demetriade nr. 2, sector 1, Bucharest, Romania

Phone: +40 (0) 21 207 77 77

Email: relatii.clienti@apanovabucuresti.ro

ANNEX 1. Public Grievance Form

Reference No:	
Full Name	<input type="checkbox"/> Anonymous
Contact Information Please mark how you wish to be contacted (post office, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Romanian
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Address: _____

Please address this form to:

Project Implementation Unit

Address: Regina Elisabeta nr. 47, sector 5 Bucharest, Romania

Email: florina.epuras@pmb.ro

or

APA NOVA BUCHAREST:

Address: Str. Aristide Demetriade nr. 2, sector 1, Bucharest, Romania

Email: relatii.clienti@apanovabucuresti.ro