

Government of the Republic of Albania

Bridge Rehabilitation and Upgrade Project (BRUP)

Prepared By

Albanian Road Authority (ARA)

PMT (E&S experts)

Stakeholder Engagement Plan

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Contents

Acronyms.....	3
1. Introduction	5
1.1 Purpose of the SEP	5
1.2 Project Description.....	6
1.3 Scope and Structure of the SEP.....	6
2. REGULATORY LEGAL FRAMEWORK.....	7
2.1 Main National Legislative Framework on Public Consultation	7
3. Consultations held on proposed Bridge Rehabilitation and Upgrade Project	8
4. Stakeholder Identification, Mapping and Analysis	10
4.1 Stakeholder Identification and Mapping	Error! Bookmark not defined.
4.2 Vulnerable groups	Error! Bookmark not defined.
5. Institutional Analysis.....	12
6. Stakeholder Engagement Plan	13
7. Implementation Arrangements for Stakeholder Engagement	15
7.1 Roles and Responsibilities.....	15
7.2. Stakeholder Engagement Methods	Error! Bookmark not defined.
8. Grievance Mechanism.....	18
8.1 Raising grievances	19
8.2 Grievances administration	19
8.3 Grievance and beneficiary feedback reporting.....	21
8.4 Constitution of GM	22
8.5 Grievance Log.....	23
8.6 World Bank Grievance Redress System	24
9. Monitoring and Reporting of the SEP	24
10. Disclosure and Consultation requirements	25

Appendix:

Appendix 1: Records of meetings or consultations.....	27
Appendix 2: Grievance form.....	28
Appendix 3: Grievance Register.....	29

List of tables:

<i>Table 1. Stakeholder engagement activities conducted during Project preparation</i>10
<i>Table 2. Stakeholder Segmentation by their Areas of Influence</i>	11
<i>Table 3: Disadvantaged and vulnerable groups need.</i>	12
<i>Table 4. Stakeholder Analysis by the Level of Engagement</i>	13
<i>Table 5: Roles and responsibilities of key actors in SEP</i>	14
<i>Table 6. Responsibilities of key actors/stakeholders in SEP Implementation</i>	15
<i>Table 7: Budget</i>	16
<i>Table 8: Summarized Grievance Redress Procedure</i>	20
<i>Table 9: Grievance Mechanism</i>	23

Acronyms

ARA	Albanian Road Authority
AP	Affected People
BRUP	Bridge Rehabilitation and Upgrade Project
E&S	Environmental and Social
ESSA	Environmental and Social Systems Assessment
EU	European Union
GOA	Government of Albania
GRM	Grievance Redress Mechanism
IPF	Investment Project Financing
LAR	Land Acquisition and Resettlement
MoFE	Ministry of Finance and Economy
MoIE	Ministry of Infrastructure and Energy
MoTE	Ministry of Tourism and Environment
NEA	National Environmental Agency
NRN	National Road Network
PDO	Program Development Objective
PMT	Project Management Team
PA	Protected Area
US\$	United States Dollar
RDCH	Regional Directory of Cultural Heritage
TA	Technical Assistance
WBG	World Bank Group

1. Introduction

The World Bank (WB) as a trusted partner aims to provide financing to the Government of Albania (GoA) for the implementation of the Albanian Bridge Rehabilitation and Upgrade Project (BRUP). The Project for Bridge Rehabilitation and Upgrade Project (BRUP) aims to finance the rehabilitation or reconstruction of priority bridges and structure on the NRN to modern standards, in order to enhance their reliability, operational performance and resilience to future climate change and geological hazards events. In addition, to ensure sustainability of the investments, the project will finance softer components aimed at strengthening the capacity of Albanian Road Authority at managing the bridge and culvert assets.

The proposed Program Development Objective is to increase the sustainability of road bridges along Albania's National Road Network through rehabilitation and strengthening, leading to better resilience to climate change and geological hazards. The project will finance the rehabilitation, upgrading or reconstruction of priority bridges on the National Road Network, to enhance their operational performance, safety and their resilience to future events.

The Components of the Project are the following:

- Component 1: Rehabilitation or reconstruction of priority bridges and culverts and associated structures
- Component 2: Institutional capacity building consider to change this component for "Modernization of the BMS" including the full support to the ARA to build capacity and to deliver the instruments as BMS adjustments and SLA.
- Component 3: Project management
- Component 4: Contingency Emergency Response Component (CERC) (estimated total cost: US\$0)

1.1 Purpose of the SEP

The purpose of the present Stakeholder Engagement Plan (SEP) is to outline the target groups and methods of stakeholder engagement and the responsibilities in the implementation of stakeholder engagement activities. The intention of the SEP is to activate the engagement of stakeholders in a timely manner during project preparation and implementation. Specifically, SEP serves the following purposes: i) stakeholder identification and analysis; (ii) planning engagement modalities and effective communication tools for consultations and disclosure; (iii) defining role and responsibilities of different actors in implementing the SEP; (iv) defining the Project's Grievance Mechanism (GM) and (v) providing feedback to stakeholders; (vi) monitoring and reporting of the SEP.

1.2 Project Description

The Bridge Rehabilitation and Upgrade Project consists of potential improvements to the bridges in local areas through Albania. The bridges related to this project are local mostly and connects logical termini, that have independent utility even if additional transportation improvements in the area are made; and does not restrict consideration of alternatives for other reasonably foreseeable transportation improvements in the area. The main objective of the project was to ensure communities are connected in urban and rural areas of Albania, to reduce traffic, floods and to have bridges with adequate infrastructure, especially over water bodies. It is planned to reconstruct or upgrade over 25 bridges and in process are 80 to be considered if they fit the requirements of the world bank for this project. The construction of these bridges will facilitate in creating plenty of opportunities for rural and estate communities, while reducing traffic jams and floods also improvement of current bridge conditions.

1.3 Scope and Structure of the SEP

The SEP shall be applicable to all activities planned under the Project. The engagement will be an integral part of the Project's environmental and social performance and project design and implementation. SEP is a "living document" and it will need to be progressively updated as the Bridge Rehabilitation and Upgrade Project progresses from stage to stage. At this stage of the preparatory phase, the main stakeholders have been contacted and consulted and also site visits have been performed based on the proposal of first -years bridges list, presented by ARA.

The document comprises 10 chapters. The first chapter serves as an Introduction. Chapter 2 lists the regulatory legal framework of Albania; Chapter 3 covers consultations on the proposed Bridge Rehabilitation and Upgrade Project held so far. In Chapter 4, Stakeholder Identification, Mapping and Analysis is described. In Chapter 5, institutional analysis is provided. In Chapter 6, the Stakeholder Engagement Plan is presented. In Chapter 7, Implementation Arrangements for Stakeholder Engagement are presented. In Chapter 8, is a detailed Description of the Project's Grievance Mechanism (GM). In Chapter 9, a close overview of the process of monitoring,

documentation and reporting is presented. Chapter 10 summarizes the disclosure and consultation requirements for SEP implementation.

2. REGULATORY LEGAL FRAMEWORK

This chapter provides a summary of the relevant aligned policies and conventions from relevant policies, laws, regulations, and review processes in Albania, specifically involving public consultation and disclosure regarding environment and land acquisition / compensation, the two common concerns from the public.

2.1 Main National Legislative Framework on Public Consultation

Environmental information and public participation in environmental decision-making are covered by the Law on Environmental Protection No. 10431/2011, which makes provisions to give the right to information without having or showing a specific interest (public information). Additionally, the Law on Environmental Impact Assessment No. 10440/2011 refers to the parties that need to be involved and refers to access to public information throughout an EIA; it also details public hearing procedures and provides for the complaint's procedure.

The following laws and Decision of Council of Ministers (DCM) are directly relevant to Public Consultation, namely:

- Law No. 8672, dated 26.10.2000, "On the Aarhus Convention Ratification on public right to information, to participate in decision-making and to have access to justice in environmental matters";
- DCM No. 994, dated 02.07.2008, "Public Participation in Environmental Decision Making";
- DCM No. 16, dated 04.01.2012, "On Public Access to Environmental Information";
- DCM No. 247, dated 30.04.2014, "On the Determination of the Rules and Requirements of the Procedures for Information and Involvement of the Public in Environmental Decision Making";

Since 2011, two further general laws were adopted that are relevant to environmental information and public participation as follows:

- Law No 119/2014, dated 18.09.2014, "On the Right to Information";
- Law No 146/2014 – On Notification and Public Consultation" – regulates the process of notifying the public on drafting legislative work and other strategic national and local documents; furthermore it
 - Establishes the Commissioner for the right of Information: to address all complaints if public right to information and consultation has been infringed by the public authority;
 - Transparency Programs for all public institutions made obligatory;
 - Public Consultation Coordinator in every public institution;

- New unique electronic register, yearly public reports on all planned acts, number of planned public hearings;
- Yearly public reporting on all approved acts, number of public hearings, number of adopted recommendations and refused ones.

Moreover, there have been two DCMs related to and strengthening access to environmental information and public participation:

- DCM No. 247 dated 30.04.2014 "On the determination of rules and requirements of procedures for public information and involvement of the public in environmental decision making"; and
- DCM No. 219 dated 11.03.2015 "On rules and procedures for consultation with stakeholders and the public and public hearings during the strategic environmental assessment process".

3. Consultations held on proposed Bridge Rehabilitation and Upgrade Project

The specific stakeholder engagement activities that have taken place during Project preparation include:

- Numerous dialogues with government and line ministries MoFE and MoIE
- Consultation with government agencies at the national level that approach the sector;
- Consultations with National Road Authority (ARA)
- Consultation with active institutions or organizations

3.1 Key meetings/consultations with stakeholders during Project preparation

In the course of Project development, several consultations were held with government agencies, international donor organizations and NGO's. The consultations objective was to assess bridges conditions. An overview is presented below and in the table.

- The dialogues have started in a meeting in Vienna in which it has been discussed the urgent reconstruction of bridges which had problems with traffic or flooding or are very depreciated is submitted. Concerns have also been discussed about the place where the Albanian bridges and roads are at the moment; and what can be invested to make then safer and aligned with the BE constructions. These concerns are expressed by the Minister Belinda Balluku from Ministry of Infrastructure and Electricity in Albania also the representatives of the World Bank.
- In September 2020 ARA with the WB Team discussed the concepts of the project. Meeting resulted to a concept plan
- In June 2021 Government Agencies, Ministry of Infrastructure and Energy, ARA/Project Management^[BY1] Team, Monitoring and Supervision Consultant of OPRCs, Consultant and Vendor of RAMS, WB, held an online conference to present individual safeguard experts for

the Bank NO_ Bridge Rehabilitation Project. Submitted the negotiated contract for Bridges FS and DD for NO_

- Last week of October , preparation mission of the WB team. Field visits by ARA Project team and the WB team

Based in all these meetings the project for the upgrading and reconstruction of the bridges is now in the process and going step by step to the implementing of the project.

Table 2. Stakeholder engagement activities conducted during Project preparation

Name	Date/Place	Position	Name of Stakeholder
<i>Conference Belinda Balluku</i>	November 2019/ <i>Vienna</i>	Ministry of Infrastructure and Electricity Albania	, World Bank Artan Guxho Sofia Guerrero Gomez...
<i>Conference Evis Berberi</i>	26 September 2020/ ARA's Office	Director of ARA	ARA, WB Team
<i>Conference Sofia Guerrero Gamez,</i>	16 October 2020/ WebEx	Senior Transport Specialist at World Bank	ARA, WB Team
<i>Conference Evis Berberi</i>	07 May 2021/ ARA Office	Director of ARA	ARA
<i>Conference Sofia Guerrero Gamez</i>	09 Jun 2021/ WebEx	Senior Transport Specialist at World Bank	ARA, WB Team
<i>Conference Evis Berberi</i>	18 Jun 2021/ ARA Office	Director of ARA	ARA
<i>Conference Sofia Guerrero Gamez, Evis Berberi</i>	23 Jul 2021/ ARA Office and WebEx	Senior Transport Specialist at World Bank Director of ARA	ARA, WB Team
<i>Conference Belinda Balluku</i>	9 June2021/ WebEx	Ministry of Infrastructure and Electricity Albania	Government Agencies, Ministry of Infrastructure and Energy, ARA/Project Management Team, Monitoring and Supervision Consultant of OPRCs, Consultant and Vendor of RAMS, WB,.
<i>Conference Sofia Guerrero Gamez,</i>	25 October 2021/ ARA Office and WebEx	Senior Transport Specialist at World Bank	WB team, PMT, ARA
<i>Field Visit Sofia Guerrero Gamez,</i>	26 October 2021/ Albania, Road Rogozhine-Lushnje and Viroi Bridge	Senior Transport Specialist at World Bank	WB, ARA, PMT, local community members.
<i>Conference Evis Berberi</i>	27 October 2021/ WebEx and ARA's office	Director of ARA	WB, ARA, PMU

<i>Field Visit Sofia Guerrero Gamez,</i>	28 October 2021/ Albania, Tirane- Ndroq-Plepa Bridges	Senior Transport Specialist at World Bank	WB, ARA, PMU
<i>Conference Belinda balluku</i>	29 October 2021/ MoIE Office	Ministry of Infrastructure and Electricity Albania	MoIE, ARA
<i>Public Cosultation Klodian Sava</i>	16 January 2022 /Gjirokastra's Municipality Office	Project manager	Head of Gjirokastra Municipality Flamur Golemi, Klodian Sava, Artan Tapia, Entela Postoli, Bledar Lisha, Silvana Qose, ...

4. Stakeholder Identification, Mapping and Analysis

The stakeholders for the Project of upgrading and Reconstructing Albanian bridges include World Bank, MoIE/ Ministry of Energy and Infrastructure, ARA, Technical Assistance providers (private sector and NGOs), Local Governments in which territory the bridges will be rehabilitated, Neighboring communities. Stakeholders that can influence the project are the MoIE and ARA.

Each stakeholder group is rated for their relative importance and influence with a rating starting from 1 to 5, the weighting derived from cross-referencing interest and power of the stakeholders. The stakeholders of high (*****) and substantial uninterrupted engagement. This helps in assigning importance for further analysis. The mapping of interest and the relative importance are presented below.

Table 2. Stakeholder Segmentation by their Areas of Influence

National / Country Level*****		
Stakeholders	Area of Influence	Significance *****
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants	*****
MoIE/ Ministry of Energy and Infrastructure	Main counterpart of the WB for Project implementation. Policy development stakeholder	*****
ARA	Main counterpart of the WB for the Project implementation. Project Implementing Agency	*****

Technical Assistance providers (private sector and NGOs)	In addition to the advisory services provided by Extension Services, Individuals, Consulting Companies and/or organizations that may be engaged to provide Technical	****
National media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	***
Social Media (Twitter, Facebook etc.)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	****
Local and Community Level		
Local Governments	Help to inform and protect the peoples interests and help with the proceedings of the project. Help with the resettlement plan to identify the parties that are	***
Local Media	Enable wide and regular dissemination of information related to the Project to ensure its visibility, facilitate stakeholder engagement on the local level, regional and national level	****

Disadvantaged / Vulnerable Individuals or Groups

Disadvantaged or **vulnerable** refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.

Disadvantaged/vulnerable individuals and groups are also those who may do not have a voice to express their concerns or understand the impacts of the Project.

The following table describes the needs of the disadvantaged or vulnerable groups.

Table 3: Disadvantaged and vulnerable groups need

Project component	Vulnerable Groups and Individuals	Characteristics/ Needs	Preferred means of notification/consultation	Additional Resources Required
Component 1: Rehabilitation or reconstruction of priority bridges and culverts and associated structures				
	Unemployed youth, women, people living beneath the poverty line, (IT) illiterate women, Roma etc.	Their voice to be heard and their needs to be taken into account.	Mass media Social media	Translated messages into Roma language if needed Contracting Stakeholder engagement (or Social aspects and services) Professionals or company

5. Institutional Analysis

The engaged existing institutions are listed in the table below and analyzed from the current status that they have, the concerns and issues they have raised and the expectations for the Project.

Table 4. Stakeholder Analysis by the Level of Engagement

Group/ Agency	Current Status	Concerns and issues	Expectations
National			
Ministry of Finance and Economy (MoFE)	State budget financial management, inclusion of state guarantees, authorized persons for disbursement since the borrower is the Republic of Albania represented by Ministry of Finance (MoFE)	Potential disbursement cap	Provide co-financing if needed for the project in accordance with the Loan Agreement. Ensure the implementing agency, to carry out their responsibilities in accordance with the agreement.

			Maintain the state guarantees, and execute the Loan Agreement as per condition of the finance contract
Ministry of Infrastructure and Energy (MoIE)	MoIE is responsible for the Implementation of the project. The Implementation reasonable will be delegated to the PIU Project Implementation Unit in accordance with the Project Director to which they report	Insufficient number of competent staff to manage large-scale projects and subprojects with ESF. Fit of the project with the overall transport strategies and policies developed by the Ministry. Coordination with other transport projects.	Overall Improve of institutional capacity in transport sector and improved capacity in implementing IFI funded projects in the Bridges sector. Hiring competent staff to manage the project at all levels
ARA	Responsible for the PMU Project Implementation Unit. Responsible for hiring the needed staff and see to the project implementation to be within the standards of the World Bank Requirements. Including Financially aspects.	Insufficient number of competent staff. Coordination with projects funded by other sources (budget and other)	Effective and efficient implementation of the project
Companies, NGOs	Provide services/value driven	Transparent execution of the project	Engaged in the project execution , involvement in the preparation and execution of sub-projects
Communities, Local Governments	Beneficiaries	Transparency , involvement during the preparation	Transparency and engagement. Effective and efficient execution of the sub-projects

6. Stakeholder Engagement Plan

Various stakeholder engagement activities are proposed to ensure awareness and meaningful consultations about Project activities. Based on the organization of work related to roads and bridges sector, the awareness campaign, outreach and stakeholder engagement will be season and gender appropriate.

The Project will develop a communication strategy for inclusive awareness raising about project scope, eligibility and selection criteria and critical milestones. The MoIE, in close collaboration with ARA and the Extension Services and Municipalities, will agree on an action list to identify appropriate communication channels and tools across the different regions of the country when the project will take place.

The table below presents roles and responsibilities of key actors in the proposed stakeholder engagement activities to be conducted under the project.

Table 5: Roles and responsibilities of key actors in SEP

Target Stakeholders	Topic(s) of engagement	Method(s) used	Location/Frequency	Responsibilities
Project Wide				
Potential project beneficiaries as well as non-targeted groups, wide range of regional and local stakeholders in the Road and Bridges sector (ARA)	Project progress, grant disbursement figures and beneficiary/applicant survey results	Regional workshops, in - person feedback	Annual	MoIE, ARA, PMU facilitated by local Governments/ Extension Services. Plan, implement and monitor SEP activities; Lead and coordinate stakeholder engagement activities;
Sub-component				
Municipality	Sub-project preparation and implementation	Meetings, field visits and information sessions	in the local level, site location. As necessary during the preparation and execution of the sub-projects	Local Governments Lead stakeholder engagement activities at the municipal and community level;
Sub-component				
Sub-component				

Potential project beneficiaries as well as non-targeted groups, institutional and commercial stakeholders in road and bridges sector.	Important production and market information, including traffic and prices for the roads etc.	Data platform integrates feedback space to ensure continuous information service adaptability	Continuous maintenance of relevant content after the open data platform becomes public	MoIE, ARA, PMU

7. Implementation Arrangements for Stakeholder Engagement

7.1 Roles and Responsibilities

Stakeholder engagement will be coordinated by MoIE and ARA. The PMU will closely coordinate with other key stakeholders-Local Governments (line departments included), Extension Services, and local NGOs. The roles of these actors/stakeholders are summarized in the Table below.

Table 6. Responsibilities of key actors/stakeholders in SEP Implementation

Actor/Stakeholder	Responsibilities
MoIE/ARA	<ul style="list-style-type: none"> Plan, implement and monitor SEP activities; Lead and coordinate stakeholder engagement activities; Collect stakeholder feedback through regional workshops, satisfaction surveys and bilateral meetings, Manage the grievance mechanism at Project level, communicate grievances regularly through monitoring reports, Build capacity of implementing partners – Local Governments Extension Services and GM on ESF stakeholder engagement standard and its implications; Manage national GM database and submit quarterly reports on the substance and quantity of grievances; and Supervise/monitor grant programs and engage with grant receipts

Local Governments	<ul style="list-style-type: none"> • Lead stakeholder engagement activities at the municipal and community level; • Coordinate with Ministry, province, Municipal Extension Services and NGOs to implement outreach activities; • Local focal point for questions on grant eligibility and application procedure requirements • Discloses all documents, distributes outreach material as needed • Facilitate the organization of regional stakeholder workshops to present project progress and collect feedback about project services • Facilitate information requests and grievances by transfer to the PMU
Line departments in Municipalities	<ul style="list-style-type: none"> • Update spatial plans and issue permits (as required) • Respond to E&S risk management requests • Facilitate information requests and grievances by transfer to the PMU • Discloses all documents, distributes outreach material as needed

7.2 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

Resources

Lump sum budget to be defined during the appraisal of the project

Table 7: Budget

Budget categories	Quantity	Unit costs	Times/ Years	Total costs	Remarks
1. Staff salaries and related expenses					
1a. E.g. Communications consultant					
1b. E.g. Travel costs for staff					
1c. E.g. Salaries for Community Liaison Officers					
2. Events					
2a. E.g. Project launch meetings					
2b. E.g. Organization of focus groups					
3. Communication campaigns					
3a. E.g. Posters, flyers					
3b. E.g. Social media campaign					
4. Trainings					

4a. E.g. Training on social/environmental issues for PIU and contractor staff					
4b. E.g. Training on GBV for PIU and contractor staff					
5. Beneficiary surveys					
5a. E.g. Mid-project perception survey					
5b. E.g. End-of-project perception survey					
6. Grievance Mechanism					
6a. E.g. Training of GM committees					
6b. E.g. Suggestion boxes in villages					
6c. E.g. GM communication materials					
7. Other expenses					
7a. ...					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					

7.3 Management Functions and Responsibilities

PMT Unit of the MoIE will be responsible for the strategic coordination and carrying out of project activities over a period of four years in coordination with ARA. The PMT, reporting to the head of the ARA , will be responsible for overseeing day-to-day project management in coordination with the project activity coordinators in PMT

PMT will hire Communication or Social consultant whose primary working responsibilities, among others, will be related to Stakeholder engagement. Responsibilities include:

- Develop a communications strategy covering the lifetime of the project
- Liaise with and manage the relationship with any contracted companies producing communication materials (posters, flyers, video/TV spots...)
- Receive and register any grievance voiced by project-affected parties or other interested parties and communicate them immediately to the PIU
- Plan and manage the project’s communications via all media channels (social media, TV, radio, written press...)
- Support the planning and logistics for capacity-building and communication events at the village level

Build and maintain constructive relationships with all stakeholder groups, particularly with the vulnerable groups and Taxpayers

8. Grievance Mechanism

To ensure GM access, potential beneficiaries, communities and other stakeholders may submit grievances through Local Governments and numerous Ministry channels as outlined below. The GM will provide the opportunity for continued feedback on the grant scheme and resolution of individual grievances during implementation. Procedures related to complaints handling will be included in the Grants Operational Manual and posted on the MoE's website to ensure full transparency.

The GM shall serve as both Project level information center and grievance mechanism, available to those affected by implementation of all Project sub-components and be applicable to all Project activities and relevant to all local communities affected by project activities. The GM shall be responsible for receiving and responding to grievances and comments of the following two groups:

- i. A person/legal entity directly affected by the project, potential beneficiaries of the Project,
- ii. Stakeholders - people with interest in the project, and
- ii. Residents/communities interested in and/or affected by project activities.

The GM shall be effective prior to commencement of the Grant Program, in order to manage and appropriately answer complaints during its different phases. It will be authorized to receive questions/complaints in respect to the marching grant scheme, including the eligibility criteria, adequacy of support to women, adequacy of stakeholder engagement and the Environmental and Social performance. In addition to the GM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.)

Project Implementing Unit within MoIE and ARA is responsible for establishing a functioning GM and informing stakeholders about the GM role and function, the contact persons and the procedures to submit a complaint in the affected areas. Information on the GM will be available:

- on the website of the MoIE (<https://www.infrastruktura.gov.al>)
- on the project website
- on the notice boards and websites of Local Governments
- through the Ministry's social media

8.1 Raising grievances

Effective grievance administration strongly relies on a set fundamental principle designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective, easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the GM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined. The access points and details on local entry points and traffic shall be publicized and shall be part of the awareness building once the micro locations of the Project are known. Also, GM could be sent via e-mail considering Covid situation. The meetings for the grievances will be held on line for social or environmental and on site for any emergency.

8.2 Grievances administration

Any grievance shall follow the path of the following mandatory steps: receive, assess and assign, acknowledge, investigate, respond, follow up and close out.

Once logged, the GM shall conduct a rapid assessment to verify the nature of grievances and determine on the severity. Within 3 days from logging, it will acknowledge that the case is registered and provide the grievant with the basic next step information. It will then investigate by trying to understand the issue from the perspective of the complainant and understand what action he/she requires. The GM will investigate the facts and circumstances and articulate an answer. The final agreement should be issued and grievant be informed about the final decision not later than 30 days after the logging of the grievance. Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance was rejected, the results will be documented, actions and effort put into the resolution. If the grievance could not be resolved in amicable endeavor, the grievant can resort to the formal judicial procedures, as made available under the Albanian national legal framework. Logging a grievance with the GM does not preclude or prevent seeking resolution from an official authority, judicial or other at any time (including during the grievance process) provided by the Albanian legal framework.

In case of anonymous grievance, after acknowledgment of the grievance within three days from logging, the GM will investigate the grievance and within 30 days from logging the grievance, issue the final decision that will be disclosed on the respective website. Table 6 below shows the grievance/feedback value chain.

The GM shall keep a grievance register log, which will include grievances received through all admission channels, containing all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. However, the personal data of each Grievant shall be protected under the Data Protection Law. Each grievance will be recorded in the register with the following information at minimum:

- description of grievance,
- date of receipt acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures),
- date of resolution / provision of feedback to the complainant,
- verification of implementation, and
- closure.

Table 8: Summarized Grievance Redress Procedure

Step	Description of process	Timeframe	Responsibility
GM implementation structure			
Grievance uptake	Grievances can be submitted via the following channels: Online, Mail, In person, Telephone, email,	/	Communication or Social consultant
Sorting, processing	Any complaint received is forwarded to Communication or Social consultant. Logged in Grievance Log. Categorized according to the following complaint types: (TBC)	Upon receipt of complaint	Communication or Social consultant
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by email, SMS or mail.	Within 2 days of receipt	Communication or Social consultant
Verification, investigation, action	Investigation of the complaint is led by Communication or Social consultant. A proposed resolution is formulated by PMT member and communicated to the complainant by Communication or Social consultant	Within 10 working days	Complaint Committee composed of 2 PMT members, Communication or Social consultant

Step	Description of process	Timeframe	Responsibility
Monitoring and evaluation	Data on complaints are collected in Grievance Report and reported to PMT every 30 days	Monthly	PMT
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by email	Upon demand	Communication or Social consultant
Training	Training needs for staff/consultants in the PMT, Contractors and Supervision Consultants are Communication skills	two months upon engagement	PMT

At all times, complainants may seek other legal remedies in accordance with the legal framework of Albania, including formal judicial appeal.

A separate grievance mechanism will be available for workers.

Contact information for enquiries and grievances:

Description	Contact details
Implementing agency:	Ministry of Infrastructure and Energy (MoIE)
Main contact:	Mr./Ms. to be defined
Address:	Rruga Abdi Toptani, 4, Tirane Albania
Website:	https://www.infrastruktura.gov.al/en/
Telephone:	Tel: +355 4 222 2245

8.3 Grievance and beneficiary feedback reporting

The role of the GM, in addition to addressing grievances, shall be to keep and store comments/grievances received and keep the Central grievance log administered by the MoIE and ARA. In order to allow full knowledge of this tool and its results, quarterly updates from the GM shall be available on the MoIE website and ARA's website. The updates shall be

disaggregated by gender, type of grievances /complaints and presented at annual workshops which will be used as a feedback generator platform

8.4 Constitution of GM

MoIE will add the role of GM for this Project to the Info Centre for Grants by the time public consultations on this SEP have been completed. This will allow any potential grievance to be addressed even at the planning stage. The info Centre within ARA will be responsible for GM administration, take any action necessary to address the grievance and inform the complainant about the outcome of the process, and maintain a data base of stakeholders, their responsible persons and representatives.

Table 9: Grievance Mechanism

	Grievance Mechanism (GM)
Level	At the level of MoIE/ARA (Info Centre & Open Data Platform)
Role	Project information center and grievance mechanism for matching grant mechanism, Environmental and Social Performance of the Project, information sharing and Extension Services
Focus	All components of the Project
Responsibility	Addressing concerns and grievances from potential beneficiaries of the Project and other interested parties
Methods for raising grievances	Grievances can be logged in writing, by e-mail or phone at the GM or at the Local designated Grievance admission points at local Municipalities
Registry of Grievances	GM Registration Log
	Grievance Log administered by MoIE/ARA
	Local Grievance Logs at local entry points (Local Governments)

	Grievance Mechanism (GM)
Administration of Grievances	The GM shall, within three days after the day of receipt, acknowledge such receipt and take overall 30 days to decide on the grievance or to inform the complainant why the grievance cannot be resolved within the given time. Within 25 days the implementation of remedy shall be verified
Reporting	GM shall keep and store all grievances in a Central Grievance Log, and publish quarterly reports on the official of MoIE website and Project's website.

Grievances may arise from members of communities who are dissatisfied with eligibility criteria use and actual implementation.

The existence of a GM should not prevent citizens or communities from pursuing their rights and interests by seeking redress through the courts, administrative law procedures, or other formal dispute resolution mechanisms available.

8.5 Grievance Log

The MoIE and ARA implementation units (PMU) should maintain grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

- Type,
- Category,
- Deadline for resolving the appeal, and
- Agreed action plan.

Each complaint should be assigned with an individual reference number and is appropriately tracked and recorded actions are completed. The log should contain the following information:

- Name of the grievant, location and details of the grievance.
- Date of submission.

- Date when the Grievance Log was uploaded onto the project database.
- Details of corrective action proposed,
- Date when the proposed corrective action was sent to the complainant (if appropriate).
- Date when the grievance was closed out.
- Date when the response was sent to the grievant.

8.6 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

9. Monitoring and Reporting of the SEP

The results of the stakeholder engagement process will be included in the Project Monitoring Reports. These will be provided at a frequency as indicated in the ESCP. The monitoring reports will include the following information:

- Venue, time and date of any public consultation meetings that have been undertaken;
- Issues and concerns raised during the consultative meetings;
- A list of the number and types of grievances raised in the reporting period and the number of resolved and/or outstanding grievances; and
- Information on how the issues raised during the meetings and through grievances were/will be taken into consideration during the Project implementation (construction) Phase.

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

a. Formal Meetings

All formal meetings, which are scheduled through the stakeholder engagement team will be documented and minutes taken. Minutes will be captured by team members engaged. Attendance registers / form will be maintained in appropriate formats.

b. Attendance Register / Form

A Stakeholders registers / form will be used to track the Consultation and Disclosure process. Specific stakeholder engagement actions will then be tracked in the registers / form, which contains the list of all stakeholders identified, under what category they fall, their importance to the project in terms of how they can influence or be influenced by the project.

c. Record Keeping

A master database will be maintained by the Consultant together with the Municipality, MoIE, ARA and PMU to record and track management of all comments and grievances, and independently audited. This will serve to help monitor and improve performance of the Comment Response and, Grievance Mechanism. This database will be continued throughout all phases of the project.

10. Disclosure and Consultation requirements

Following a 14 days two-week disclosure window once endorsed by MoIE and the WB, the draft SEP, shall be subject to Public consultations. The SEP will be disclosed in Albanian and English at the website of the MoIE together with invitations to the Public Consultations. Given the importance of Project, its scale and geographical spread the Public invitation shall be announced in a reputable printed media with national coverage to allow a wide range of Stakeholders to be included in the Consultation process. This will provide the Stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures and allow MoIE to consider and respond to them.

The Invitation shall indicate how the document to be consulted on may be accessed, the Project details, date, time and venue of the consultations, and contact information details for feedback and /or questions.

Once the Consultations have been completed, Minutes of the Meeting shall be prepared and annexed to the SEP. The Minutes shall reflect on the feedback received, questions raised and how these were incorporated into the final document. The attendance of Stakeholders shall be

verified through a signed attendance log, preferable with contact details of the attendees and photographs with permission to disclose.

APPENDIX 1: Records of meetings or consultations

Number: _____	Date and location of meeting: _____
The purpose of the engagement: <i>(for example, to inform stakeholders of an intended project or to gather their views on potential environmental and social impacts of an intended project)</i>	
The form of engagement and consultation: <i>(for example, face-to-face meetings such as town halls or workshops, focus groups, written consultations, online consultations)</i>	
Number of participants and categories of participants:	
List of relevant documentation disclosed to participants:	
Summary of main points and concerns raised by stakeholders:	
Summary of how stakeholder concerns were responded to and taken into account:	

Issues and activities that require follow-up actions, including clarifying how stakeholders are informed of decisions:

Appendix 2: Grievance form

Reference No:

Full Name:

Note: you can remain anonymous if you prefer, or request not to disclose your identity to the third parties without your consent. In case of anonymous grievances, the decision will be disclosed at the Projects website

First name _____

Last name _____

I wish to raise my grievance anonymously

I request not to disclose my identity without my consent Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).

By Post: Please provide mailing address:

By Telephone: _____

By E-mail _____

I will follow up the resolution at the website as I want to remain anonymous

Preferred Language for communication Albanian Other (*indicate*)

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*)

- 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: The Ministry of Infrastructure and Energy.

Appendix 3: Grievance Register

Reception date	Name of Complainant	Communication Channel (how)	Component	Description of Problem	Actions taken