

REPUBLIC OF SERBIA

SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM

Phase I

Stakeholder Engagement Plan

(SEP)



Final draft for public consultations

October, 2019

CONTENT

Contents

Glossary	4
List of Abbreviations & Acronyms	5
1. Introduction.....	6
1.1 Purpose of the SEP	6
1.2 The Project and its Components	6
1.3 Scope and Structure of the SEP	7
1.4 Summary of potential environmental and social impacts.....	8
2. Policy and Regulatory Framework for Citizen Engagement in Serbia	9
3. World Bank Environmental and Social Standard on Stakeholder Engagement	9
4. Summary of previous stakeholder engagement activities.....	10
4.1 Lessons Learned on Stakeholder Engagement from Previous Flood Protection Projects.....	11
5. Engagement during Project Preparation - Stakeholder Identification Mapping and Analyses	11
5.1 Stakeholder Identification and Mapping	11
5.2 Disadvantaged / Vulnerable individuals or groups.....	13
5.3 Stakeholder Analysis	14
5.4 Gender analysis, actions and indicators.....	18
5.5 Stakeholder expansion	18
5.1 Planned stakeholder engagement activities	19
6. Stakeholder engagement activities.....	25
6.1 Detail on engagement methods to be used	25
6.1.1 Project outreach methods.....	25
6.1.2 Mass/social media communication.....	25
6.1.3 Communication materials	25
6.2 Grievance mechanism.....	25
6.3 Information Desks.....	26
6.4 Citizen/PAP perception survey and feedback	26
6.5 Trainings, workshops.....	26
6.6 Proposed strategy to incorporate the view of vulnerable groups	26
6.7 Information disclosure	27
7.4 Transboundary communication	28

8. Implementation Arrangements and Institutional analysis for Stakeholder Engagement	29
8.1 Project enabling efforts from lessons learned	29
8.2 Roles and Responsibilities	29
8.3. Stakeholder Engagement Methods	Error! Bookmark not defined.
9.1 Raising grievances	31
9.2 Grievances administration	31
9.3 Grievance and beneficiary feedback reporting	32
9.4 Constitution of GM	Error! Bookmark not defined.
9.5 Grievance Log	Error! Bookmark not defined.
9.6 Grievance admission channels	33
9.7 Monitoring and Reporting on Grievances	33
9.8 World Bank Grievance Redress System.....	34
10. Monitoring and Reporting of the SEP	34
A.1.1 Reporting frequency	36
A.1.2 Six Monthly E&S Compliance Reports to the World Bank	Error! Bookmark not defined.
A.1.3 Involvement of stakeholders in monitoring activities.....	36
A.1.4 Reporting back to stakeholder groups	36
11. Disclosure and Consultation requirements	36
12. Estimated Budget.....	37
ANNEX 1 – GRIEVANCE REGISTRATION FORM	38

Glossary

Consultation: The process of sharing information and getting feedback and/or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

Environmental and Social Standards (ESSs): The 10 Environmental and Social Standards (ESSs) set out the requirements that apply to all new World Bank investment project financing enabling the World Bank and the Borrower to manage environmental and social risks of projects.

Project: Refers to the Sava Drina River Corridor.

Stakeholders: Refers to individuals or groups who: (a) are affected or likely to be affected by the project (*project-affected parties*); and (b) may have an interest in the project (*other interested parties*).

Stakeholder engagement: A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, and reporting to stakeholders and management functions.

Stakeholder Engagement Plan (SEP): A plan which assists the Borrower to effectively engage with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.

List of Abbreviations & Acronyms

CMU	Country Management Unit of the WB
CPF	Country Partnership Framework
EHS	Environmental, Health and Safety
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FY	Fiscal Year
GM	Grievance Mechanism
GoS	Government of Serbia
GRS	Grievance Redress System
IDA	International Development Association/ World Bank
IFIs	International Financial Institutions
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MAFWM	Ministry of Agriculture, Forestry and Water Management of the Republic of Serbia
MCTI	Ministry of Construction, Transport and Infrastructure
MoF	Ministry of Finance of the Republic of Serbia
NGO	Non-Governmental Organization
PDO	Project Development Objective
PIU	Project Implementation Unit

1. Introduction

The World Bank (WB) as a trusted partner on the Western Balkans aims to provide financing through a multiphase program approach to the Government of Serbia (GoS)¹ for the implementation of the Serbian part of the first phase of the Sava and Drina river corridors integrated development program (hereinafter referred to as: The Project). The Development Objective of the Sava Drina River Corridors Integrated Development Project (Phase 1 of the Program) is to improve flood protection, and transboundary water resources management in selected catchment areas of the Sava and Drina river corridors and aims to promote regional economic integration and EU accession within a challenging political environment.

The Project is aligned with Serbia CPF 2016-2020 and with the World Bank's twin goals, with the priorities set out by the national governments of the program's beneficiaries, and with EU policy goals for the region.

The project is designed as an Investment Project Financing (IPF) and as such needs to comply with the World Bank's Environmental and Social Standards (ESS). In response to the commitment of the GOS to comply with the ESF, the Ministry of Agriculture, Forestry and Water Management (MAFWM) has developed this Stakeholder Engagement Plan (SEP) for the two Sub-Projects known at this stage and as a framework approach for Sub-Projects where the design and location of the project since it has multiple subprojects that will only be designed during project implementation, to guide the project's stakeholder engagement in line with ESS 10 - Stakeholder Engagement and Information Disclosure, from the early stages and throughout the Project cycle focusing on gender gaps and tailored approaches.

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 throughout 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 Plan; (iv) defining the Project's Grievance Mechanism (GM) and (v) providing feedback to stakeholders.

1.2 The Project and its Components

The program has been organized into three components, as follows:

Component 1: Integrated Management and Development of the Sava River Corridor

The component will finance investments in renovation and upgrading of flood protection infrastructure in phase I and port rehabilitation and river training works to give more room for the Sava River in phase II. Phase

¹ This is part of a multiphase programmatic approach with an overall financing envelope of EUR225.4 million US\$250.2 million equivalent)

I activities will reduce the risk and impact of floods, thereby increasing the resilience of the riparian countries to these climate-related threats. The component will also support upgrading of the freight carrying capacity of the Sava waterway consistent with Class IV standard at selected bottleneck sections that are currently constrained to Class III standard or lower; and cargo handling capacity expansion at selected river port facilities to take full advantage of improved navigation conditions. Requested GEF funding will support the prioritization and preparation of some activities.

Component 2: Integrated Management and Development of Environmental Assets along the Drina River Corridor

This component will support multipurpose investments along the Drina to reduce the risk of flood and drought in phase I. It will also support interventions that will optimize reservoir operation, and to protect environmental assets of global value in phase II. This component will facilitate the implementation of actions, management measures and investments identified by the Drina Strategic Action Plan being prepared under the ongoing Western Balkans GEF-SCCF Drina River Basin Management Project and investments identified through the ESMAP Integrated Water and Hydropower Development Project. All the above measures will contribute to increased resilience of the riparian countries to floods and droughts. Requested GEF funding will support the prioritization and preparation of these activities.

Component 3: Enabling regional economic integration, institutional strengthening and program management

This component will support: 1) preparation of phase II activities; 2) policy dialogue, consultations, preparation of plans and studies, and investments to strengthen the nexus between water services and connectivity with the regional development and economic integration objectives of the Sava and Drina Corridor. Examples include, River Basin Management Plans and Hydrological assessments, etc.; 3) planning and development of tourism in the Sava-Drina corridor including the designing of Master Plans for Ecotourism. River Basin Management Plans and Hydrological assessments will ultimately support integrated water resources management, thereby indirectly increasing the resilience of riparian countries to climate change; and 4) operational costs, consultancies, non-consultancy services, and goods required for the establishment and operation of the Regional Coordination Steering Committee and national PIUs. Requested GEF funding will co-finance measures related to river basin planning and management, flood monitoring network, institutional capacity building, and studies that inform or prepare future investments.

1.3 Scope and Structure of the SEP

The SEP shall be applicable to all activities planned under the Project in Phase I, while the adequacy of this SEP shall be assessed and update as the case may be prior to commencement of Phase II. The stakeholder engagement will be an integral part of the project's environmental and social performance and project design and implementation.

The document comprises 12 chapters. Chapter 1 introduces the Project and its objectives, followed by Chapter 2 listing the regulatory framework for citizen engagement in Serbia, which provides the framework for SEP in addition to the World Bank ESS10 presented in Chapter 3. A summary of stakeholder engagement held so far is presented in Chapter 4. Stakeholder Identification, Mapping and Analysis is described in Chapter 5. Institutional analysis is provided in Chapter 6. The Stakeholder Engagement Activities are presented in

Chapter 7. Implementation Arrangements for implementing the SEP are presented in Chapter 8. Description of the Project's Grievance Mechanism (GM) follows in Chapter 9. Monitoring, documentation and reporting are presented in Chapter 10, disclosure and consultation requirements in Chapter 11, while the budget needed for implementation of the SEP is discussed in Chapter 12.

1.4 Summary of potential environmental and social impacts

Potential environmental and social impacts of the project, as identified in the ESMF based on the environmental and social assessment thereunder, which need to be the focus of stakeholder engagement activities, include:

- **Potential impacts on landscapes and views** due to construction and maintenance activities,
- **Permanent and temporary acquisition of land,**
- **Temporary restriction to access to land,**
- **Labor influx and Gender based violence stemming from the influx,**
- **Temporary diversions and closure of routes and roads,**
- **Erosion and topsoil loss** due to land clearing and vegetation removal and/or excavation, machinery operations, excavations of material,
- Potential impacts on **air quality** due to movement of vehicles and equipment, earthworks, open piles of topsoil and spoil, and the operation of combustion engines and/or,
- **Noise, dust, waste generation and traffic disturbance** from construction vehicles and machinery,
- **Physical or economic displacement, loss of assets, loss of livelihood and related compensation procedures,**
- **Generation of local income** through the recruitment of workers from local communities to the project.
- **The Project's added value and community benefits and support.**

1.5 Project Locations

This project will be implemented through a number of Sub-Projects with majority of locations yet to be defined. However, two Sub-projects are sufficiently mature with high implementation readiness and relevance to the program objectives, with detail designs and tender documents likely to ready by Effectiveness.

Detailed engineering designs are available for: (i) Rehabilitation of the left Sava riverbank in Jarak (Municipality of Sremska Mitrovica) and (ii) Embankments stabilization of left Sava river dyke in Martinci - Popova Bara (Municipality of Sremska Mitrovica). For these two Sub-Projects site specific Resettlement Plans (RP) are under preparation for which engagement activities and methods as designed in this SEP and supplemented with resettlement specific engagements standards will be used.

2. Policy and Regulatory Framework for Citizen Engagement in Serbia

The Republic of Serbia citizen engagement commitments do not reside under a single self-standing law or regulation. However, the recognition of importance of citizen engagement is embedded in the legal system and clearly recognized by the mandatory procedures provided by individual laws. From the Constitution as the highest legal act down to an ample normative framework comprising the Serbian legislative ground, there is a strong commitment to stakeholder engagement. The Constitution of the Republic of Serbia (2006) proclaims the rule of law and social justice, principles of civil democracy, human and minority rights and freedoms, and commitment to European principles and values. Article 74 proclaims the right to healthy environment and grants the right to timely and comprehensive information on the state of the environment.

On May 12, 2009, the Republic of Serbia ratified the Aarhus Convention on Access to information, public participation in decision-making and access to justice in environmental matters („Official Gazette – International Contracts“, No. 38/09) and it links environmental and human rights and is based on the belief that it is a basic right of present and future generations to live in an environment adequate to health and wellbeing. The convention is focused on achieving this through the implementation of three pillars: rights of access to information, access to decision-making, and access to justice.

Other stakeholder engagement, disclosure and transparency requirements within certain topics and sectors are embedded in the applicable laws regulating each of the treated subject (i.e. Expropriation, Environmental impact assessment). These are overall compliant to the requirements of ESS10 but have certain shortcomings when it comes to active outreach and continuous engagement strategies.

3. World Bank Environmental and Social Standard on Stakeholder Engagement

The new World Bank’s Environmental and Social Framework (ESF)² came into effect on October 1, 2018. The Environmental and Social Standard (ESS) 10 is on “Stakeholder Engagement and Information Disclosure”. The provisions of the Standards are to be read in conjunction with other applicable ESSs. The specific requirements set out by ESS10 are highlighted below:

- Borrowers will commence with stakeholder engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design and shall maintain such engagement throughout the Project cycle. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

² www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards²

- The process of stakeholder engagement will involve the following: (i) stakeholder identification and analysis; (ii) planning on ways to engage; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose a stakeholder engagement log as documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.
- The Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

The SEP is a living document, potential changes are driven by any changes in the Project during its implementation. Should the project be subject to significant changes, such updates will be reflected in the SEP and the document will be re-disclosed.

4. Summary of previous stakeholder engagement activities

The Project's financial intervention is targeted towards flood protection, reconstruction of water infrastructure and facilities. The specific nature of the Project yet leaning on to completed and on-going sector interventions within the water agenda required a broad engagement with various project stakeholders and is ongoing since early 2019. The specific stakeholder engagement activities that have taken place during Project preparation include:

- Numerous dialogues with government agencies at the national, regional and local level;
- Consultations with potential beneficiary groups, including agri-businesses, and their representatives;
- Detailed discussions with relevant ministries and implementation agencies in each country, in joint meetings with stakeholders from multiple sectors including water, transportation, environment, and energy, and agreed to the completeness and readiness of the subproject list as well as the proposed implementation arrangements,
- Review of project preparation status with representatives from the Ministry of Construction, Transport and Infrastructure, PWC Serbia Water, PWC Vode Vojvodina and Water Directorate of the MAFWM, including safeguard documentation,
- Meeting with the secretariat of the International Sava River Basin Commission (ISRBC) and agreed to the regional activities.
- Meeting with Project Affected Persons and citizens from Martinci, where the river Sava poses threat to the settlement in its entirety but more explicit and imminent danger to private assets placed at the very edge of the steep river banks.

Obviously the process of engagement until now was steered prevalently towards the governmental authorities as well as those responsible for water management and transport, environment and infrastructure as they are best placed at the moment to help erect the architecture of the Project given the regional importance and programme structure. However, the importance of the Project and willingness and

readiness to move forward with preparation of relevant documents, strategies and continued dialogue including preparation of detailed designs for individual sub-project are some of the highlights.

On the other hand, the early stakeholder engagement during the meeting in Martincy surfaced the expectations of the citizens that protection from damages the river Sava persistently is causing, delayed for years now will finally be considered. The expectations are high, the detailed design almost finalized and a draft Resettlement Plan was prepared for this sub-project.

Further details shall be added when other beneficiaries are also consulted.

4.1 Lessons Learned on Stakeholder Engagement from Previous Flood Protection Projects

Lessons from previous investment operations in Serbia: Previous World Bank support has been provided in a fragmented manner to the sector and mainly at national level without transboundary effects. The World Bank has been a long-standing partner in this region contributing immensely to the knowledge and decision support agenda. There has been extensive work covering a wide range of studies and policy dialogue activities, at different levels, with the Sava and Drina riparian countries, as well as technical assistance provision in different sectors, since 2007. However, these fragmented engagements failed to create the much needed enabling platform for collaborative sustainable management and development of the shared natural resources across the basin. Project visibility matters for uptake and adaptive design. For effective implementation, project activities need to be discussed with stakeholders at preparation and launch, lessons learned during implementation of each phase need to be shared.

5. Engagement during Project Preparation - Stakeholder Identification Mapping and Analyses

ESS 10 recognizes two broad categories of stakeholders: 1) Project Affected Parties and 2) Other Interested parties. **Project-affected parties** includes those likely to be affected by the project because of actual impacts (positive and negative) or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including direct project beneficiaries and local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project. The term “**Other interested parties**” (OIPs) refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups.

5.1 Stakeholder Identification and Mapping

Stakeholder mapping is done vertically (across the administrative space) and horizontally (within an individual space). The first step involves universal mapping. Each stakeholder group is rated for their relative importance and influence - starting from rating from 1 to 5, the weighting derived from cross-referencing interest and power of the stakeholders. The stakeholders of high (5*) and substantial significance (4*) are stakeholders to be included into all engagement activities and require continuous and undisrupted engagement. This helps in assigning importance for further analysis. The universal mapping, interest and the relative importance are presented below.

Table 1. Stakeholder Segmentation by their Areas of Influence

National / Country Level*****		
Stakeholders National level	Area of Influence	Significance *****
Ministry of Finance	Loan Agreement oversight	*****
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants	****
Ministry of Agriculture Forestry and Water Management	Main counterpart of the WB for Project implementation	*****
Ministry of Construction, Transport, and Infrastructure (MCTI)	Main counterpart of the WB for Project implementation for component related to	*****
Ministry of environmental protection at National level	Main authority for environmental protection and permitting	*****
Provincial Secretariat for Urban Planning and Environmental Protection of Vojvodina	Main authority for environmental protection and permitting at the level of the Autonomous Province of Vojvodina	*****
PIU housed by the Directorate for Water Ministry of Agriculture Forestry and Water Management	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination	*****
PIU housed by the MCTI	Implementation of	
CFU housed by the Ministry of Finance	Procurement and financial management activities	*****
PWMC Srbijavode	Main authority for water management in Serbia (except the AP Vojvodina)	*****
PWMC Vode Vojvodine	Main authority for water management the level of the Autonomous Province of Vojvodina	*****
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		
People affected by land acquisition	Affected by loss of assets attributable to the implementation needs of the Sub-projects	*****
People residing in the project areas	Individuals and household likely to observe changes from the environmental and social impacts of the Sub-Projects during their implementation stemming from civil works These PAPs are likely to be affected by disturbances caused by the Project's heavy vehicles traffic, construction impacts, etc., but may also benefit from project-related employment	*****
Local Governments (including line departments: land management, economic development, environment, Mesne zajednice)	Serve as first point of contact, conduct field outreach, disseminate project related materials, facilitate public meetings and consultations, liaison between targeted groups and MAFWM /PIU. Administratively manage the land acquisition process. Responsible for Sub-Project GM set up, management and monitoring.	*****
Local media (radio, TV, Newspaper)	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	*****
Education and research institutions, community organizations	Provide knowledge and research on the latest developments in the agricultural sector	***
Low-skilled, semi-skilled and high-skilled workers	Positive externalities beneficiaries through potential employment	***

5.2 Disadvantaged / Vulnerable individuals or groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. The project area includes villages often affected by floods in the recent past and are classified as vulnerable due to flood risks. Additional disadvantaged / vulnerable individuals or groups in the project area include “those

registered as poor with the local social services; women-headed households; elder-headed households (\geq pension age) without any other household member bringing in income; and households headed by disabled people. For each Sub-Project a vulnerability assessment will be conducted as part of the project preparation and shall inform both the RP if needed and the need to adapt the engagement methods and approaches as designed in this SEP bridge any engagement barriers stemming from vulnerability.

5.3 Stakeholder Analysis

The stakeholders of high and substantial significance (ranked 5* and 4* during universal mapping) are analyzed in the Table below. The analysis includes the current status of the stakeholder, concerns and issues raised during consultations, their expectations from the project, significance of the risk of unmet expectations and enabling conditions required to mitigate those risks. The stakeholder risk is moderate due to the need to coordinate with multiple stakeholders throughout the Project period.

Table 4: Stakeholder Analysis by the Level of Engagement

National Level					
1. Subgroup	2. Current Status	3. Concerns and issues	4. Expectations	5. Risks	6. Enabling Qualifiers
Ministry of Finance (MoF)	State budget financial management, inclusion of state guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the state guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives	Implementation readiness, effectiveness and disbursement delays	Meeting the timelines for Project Approval and implementation in line with goals as set forth in the Project documents.	Low	Approval of Loan, Project Operations Manual and other project specific documents prepared by the Borrower i.e. PIU
MAFWM/PIU	Has experience in WB projects including flood protection Projects and is experienced in implementing the WB ESF	PIU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Maintain institutional capacity in implementing World Bank funded project in the flood protection and prevention sector, hiring competent staff to manage the project at all levels	Moderate	Within MAFWM a PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for

					MAFWM/PIU throughout Project implementation
MCTI/PIU	Has experience in WB projects and is experienced in implementing the WB ESF	PIU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Adequate institutional capacities in implementing World Bank funded project in the, hiring competent staff to manage the project at all levels	Moderate	Within MCTI a PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for MCTI/PIU throughout Project implementation
Ministry of Environmental Protection	Experienced in permitting and EIA procedures	Delays in issuing permits due to changes after elections	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Reasonable time for appointment of new Government
Provincial Secretariat for Urban Planning and Environmental Protection of Vojvodina	Experienced in permitting and EIA procedures	Delays in issuing permits due to changes after elections	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Reasonable time for appointment of new Government

CFU in the Ministry of Finance	Procurement and financial management activities housed in CFU, experience in implementing WB financed Projects	Potentially insufficient number of staff to manage multiple WB Projects	Establish and maintain excellent communication and coordination with MAFWM/PIU and MCTI/PIU and other relevant stakeholders	Moderate	Project will strengthen CFU capacity by hiring additional fiduciary staff as needed
Community level					
1. Subgroup³	2. Current Status	3. Concerns and issues	4. Expectations	5. Risks	6. Enabling Qualifiers
Local Governments (including line departments: land management, economic development, environment, Mesne zajednice)	Variable experience in WB projects in implementing the WB ESF	Adequate and timely response to requests for implementation of measures designed in the ESMF, SEP RPF, RP etc.	maintain excellent communication and coordination with MAFWM/PIU	Moderate	Timely commencement of engagement and integration into the Project processes by the MFWM /PIU

³ Sub-groups at community level are not exclusive and may have multiple overlaps (e.g. young women agri-food producers who lives in a disadvantaged area would receive extra points in the selection criteria for all three characteristics (gender, age and location).

5.4 Gender analysis, actions and indicators

The Projects proposed interventions will not deliver their intended economic and social returns in full unless all members of the target populations and end-user beneficiaries, irrespective of gender, can participate in the decision-making process and access improved facilities. The sub-project consultation will actively involve community members, irrespective of gender, to ensure effective public participation. At the same time, enterprise surveys have shown that women-headed businesses incur higher logistics costs than male-headed businesses. The nature of this gap as it relates to the Sava River Basin will be further explored during Phase 2 preparation, to better understand the needs and risk exposure of women-headed businesses and to promote interaction between these businesses and the river port authorities of the Sava corridor. In the CPF 2015-2020 some gender gaps have been highlighted that could be addressed commensurate to the force of the Project. Serbia female labor participation has been assessed as low and the Project will promote access to employment and service provision opportunities. On the objective area of supporting development of more efficient land and property markets it is noted that properties are almost invariably registered to males, making it difficult for female household members to participate in the benefit sharing and decision making related to displacement. The project Development Indicators (PDOs) include the number of people benefiting from enhanced flood protection measures disaggregated by gender.

5.5 Stakeholder expansion

This Project will have prevalent number of groups of people and economically differentiated groups who are interested in the project on different levels. The Project may need to revisit the list of stakeholders and verify if there is a need to expand the list and engage with other stakeholders in course of the Project. This will be facilitated by filling out the stakeholder expansion questionnaire below at critical points during Project implementation (e.g. after first call for proposal, mid-term, substantial project design changes, etc). A potential update will be part of the Monitoring & Evaluation (M&E) segment of the Project.

Table 2: Expansion and update questionnaire

STAKEHOLDER EXPANSION AND UPDATE NEED QUESTIONNAIRE	
<input type="checkbox"/> YES <input type="checkbox"/> NO <i>If No the Project needs to expand the Stakeholder list</i>	Is our current list focused on relevant stakeholders who are important to our current and future efforts? <i>(Answers should be based on knowledge of the Project, feedback received and grievances registered tackling inadequate outreach, and feedback from Extension Services and TA during their Engagement)</i>
<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If No the Needs assessment should be revisited or a supplementary conducted and Stakeholder list revisited</i>	Do we have a good understanding of where stakeholders are coming from, what they may want, whether they would be interested in engaging with the Project, and why? <i>(The answers should be based on the frequency of stakeholders approaching through communication channels other than the Projects, with suggestion for inclusion of groups or eligible activities etc.)</i>
<input type="checkbox"/> Yes <input type="checkbox"/> No	Does the current engagement strategy focus adequately on potential beneficiaries of the Project from vulnerable groups?

<i>If No the Stakeholder list should be revisited as well as admission and evaluation criteria should be revisited</i>	<i>(Answers should be based on the Stakeholder engagement log relative to the gender aspects and grievances received by women focusing on insufficient inclusion and/or access to Project benefits)</i>
--	---

5.6 Planned stakeholder engagement activities

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the three main project stages (RPP preparation, implementation and project design; construction; post-construction and operation phase). A more detailed explanation of the stakeholder engagement methods used is included in section 6.

Table 3: *Planned stakeholder engagement activities by project phase*

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
RAP, SEP, LMP and ESMP preparation and implementation; Detailed Design	Project Affected Parties - People affected by land acquisition; People residing in project area; Vulnerable households Community members	Land acquisition process; Assistance in gathering officials documents for early land registration; Compensation rates and methodology; Project scope and rationale; Project E&S principles; Resettlement and livelihood restoration options; Grievance mechanism process Potential Labor influx stemming from construction works Awareness raising on Gender Based Violence (GBV) Community Health and Safety Environmental and Social risks (other than resettlement) and mitigation measures Labor Management Procedures (applicable to the Project) for potential job-seekers	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism PAP survey - Upon completion of resettlement	Project launch meetings in municipalities; Monthly meetings in affected municipalities and villages; Survey of PAPs in affected villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	PIU (Environment & Social Consultants, land acquisition department of Municipalities E/S Consultant; Municipal grievance committee
	Other Interested Parties (External); Municipalities	Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options;	Face-to-face meetings; Joint public/community meetings with PAPs	Weekly (as needed)	PIU (E&S team, CLOs, land acquisition

	Cadaster offices National and local	Project scope, rationale and E&S principles; Grievance mechanism process			department); RAP consultant
	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers	Land acquisition process; Grievance mechanism process; Project scope, rationale and E&S principles	Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipalities and HQ; Grievance mechanism; Project tours for media, local representatives	Project launch meetings; Monthly meetings in affected municipalities and villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	PIU (E&S team, CLOs, land acquisition department)
	Other Interested Parties (External) Other Government Departments from which permissions/clearances are required; Other project developers reliant on or in the vicinity of the Project and their financiers	Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Grievance mechanism process	Face-to-face meetings; Invitations to public/community meetings	As needed	PIU (E&S team, CLOs, land acquisition department)
	Other Interested Parties (Internal) Other PIU Staff; Supervision Consultants; Contractor, sub-contractors,	Project information - scope and rationale and E&S principles; Training on ESIA and other sub-management plans; Grievance mechanism process	Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings	As needed	PIU (E&S team, CLOs, land acquisition department)

	service providers, suppliers and their workers				
Construction (mobilization, construction, demobilization)	Project Affected Parties - People affected by land acquisition; People residing in project area; Vulnerable households	Land acquisition process (land registration; compensation rates and methodology; livelihood restoration) Grievance mechanism process; Health and safety impacts (EMF, Construction-related safety measures); Employment opportunities; Environmental concerns; GBV awareness-raising	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; individual outreach to PAPs Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism Citizen/PAP survey - Upon completion of resettlement and/or construction	Monthly/quarterly meetings in all affected municipalities and villages with ongoing construction; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	PIU (E&S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors; NGOs/trainers; Municipal grievance committee
	Other Interested Parties (External) National Agency of Public Registry; Municipalities (including Mayor's representatives in villages)	Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance mechanism process	Face-to-face meetings; Joint public/community meetings with PAPs	Weekly (as needed)	PIU (E&S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors;

	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers	Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Health and safety impacts; Employment opportunities; Environmental concerns; Grievance mechanism process	Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipalities and HQ; Grievance mechanism; Project tours for media, local representatives	Monthly/quarterly meetings in all affected municipalities with ongoing construction and headquarters; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	PIU (E&S team, CLOs, land acquisition department)
	Other Interested Parties (Internal) Other PIU Staff; Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers	Project information - scope, rationale and E&S Principles; Training on ESIA and other sub-management plans; Grievance mechanism process	Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings	As needed	PIU (E&S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors;

Post-construction and Operation phase (within life of the Project and defect liability period)	Project Affected Parties - People affected by land acquisition; People residing in project area; Vulnerable households	Satisfaction with engagement activities and GRM; Grievance mechanism process; Electro-magnetic fields; Community health and safety measures during TL operation; Accessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any)	Public meetings, trainings/workshops, individual outreach to PAPs Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism PAP survey - Upon completion of resettlement	Meetings in affected municipalities and villages (six-monthly); Survey of citizens/PAPs in affected villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	PIU (E&S team, CLOs, land acquisition department)
	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers	Grievance mechanism process; Electro-magnetic fields; Community health and safety measures during TL operation;	Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipalities and HQ; Grievance mechanism; Project tours for media, local representatives	Meetings in affected municipalities (six-monthly); Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	PIU (E&S team, CLOs, land acquisition department)

6. Stakeholder engagement activities

Various stakeholder engagement activities are proposed to ensure awareness and meaningful consultations about Project activities. The outreach and stakeholder engagement will be gender appropriate, taking into consideration the after-hour chores of women. Targeted messaging will encourage the participation of women, those living in areas with risks from flooding and highlight Project characteristics that are designed to respond to their needs and increase their access to Project benefits.

6.1 Detail on engagement methods to be used

6.1.1 Project outreach methods

At the start of the project, MFWM/PIU will organize project launch meetings in each of the 2 municipalities Jarak and Sremska Mitrovica where the Sub-Projects identified at appraisal stage are located. Such engagement will then continue whenever new Sub-Projects are agreed to be developed. The PIU will rely on the support from the respective Municipalities to help organize community meetings/sensitization sessions in all settlements throughout the project's lifecycle. Launch meetings shall be the first step in the Sub-Project preparatory activities. The Project will include targeted outreach to women and disadvantaged groups ahead of these meetings to ensure their integration in the engagement activities.

6.1.2 Mass/social media communication

The PIU shall engage a social expert who shall be inter alia responsible to assist the PIU in disclosure, dissemination of information and communication with the local population. The media for communication shall be as seen fit for each community taking into consideration the type and sensitivity of stakeholders.

6.1.3 Communication materials

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. PIU will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance both in English and Georgian. The website will also provide information about the grievance mechanism for the project (see next sub-section).

6.1.4 Grievance mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project. Dedicated communication materials (GM pamphlets, posters) will be created to

help local residents familiarize themselves with the grievance redress channels and procedures. A GM guidebook/manual will also be developed and suggestion boxes installed in each affected municipality and village. In order to capture and track grievances received under the project, a dedicated GM Management Information System/database is planned. GM committees at the municipal level will benefit from training on how to receive, respond to, address and close grievances in line with best international practices. Internal GM training will also take place for Municipal and contractor staff. The PIU's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GM committee works, both in terms of process and deadlines.

6.1.5 Information Desks

Information Desks in each municipality will provide local residents with information on stakeholder engagement activities, construction updates, contact details of the PIU. The PIU will set up at affected municipalities information desks, in the premises of each affected Municipality where they can meet and share information about the project with PAPs and other stakeholders. Brochures and fliers on various project related social and environmental issues will be made available at these information desks.

6.1.6 Citizen/PAP perception survey and feedback

Six months after each launch meeting the PIU will conduct sample-based stakeholder satisfaction surveys to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iv) quality of the communication and dialogue with the internal stakeholders (PIU, Contractor, GM etc) during construction works. The survey results will be soliciting feedback on the effectiveness of the project activities that will be used for communication level improvements. This will allow the PMT to identify potential design issues related to access and implementation of the matching grant program and the effectiveness of advisory services. The survey data will be disaggregated by age, gender and location). Survey results with proposed corrective measures will be published on Ministry website and discussed at consultation meetings.

6.1.7 Trainings, workshops

Trainings on a variety of social and environmental issues will be provided to each contractor staff and possibly relevant local government stakeholder. Issues covered will include a sensitization to gender-based violence risks.

6.1.8 Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of social specialist will help to ensure proactive outreach to all population groups. Training and awareness raising sessions will be conducted in villages rather than municipal centers to ensure higher participation of targeted population. Focus groups dedicated specifically to vulnerable groups will be conducted with vulnerable groups including groups will be conducted to gauge their views and

concerns including for Roma communities, households and individual to identify any cumulative vulnerability stemming from their unintegrated status in the community and the project attributable impacts.

6.2 Information disclosure

The website of MAFWM will be used (<http://www.minpolj.gov.rs/>) and any respective local Municipality will be used to disclose project documents, including those on environmental and social performance in both Serbian and English. PIU will create a webpage on the Project on its existing website. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the homepage of the MAFWM website. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on the website. Details about the Project Grievance Mechanism will be posted on the website including the electronic grievance submission form will also be made available on PIU's website. Contact details of the PIU, the Contractor(s) as appointed, the Supervision Consultant as appointed, the GM will also be made available on the website. PIU will update and maintain the website regularly (at least once a quarterly basis). Further, PIU will create a dedicated project Facebook page for Hosed

6.8. The Stakeholder Engagement log (SEL)

The PIU will maintain and disclose a stakeholder engagement log as documented record of all stakeholder engagement activities, including group and individual meetings, planned or spontaneous meetings, formal or informal, phone conversations, written exchanges etc. Each log entry shall contain details of stakeholders engaged, date, time and place of meeting/method of communication, short description of the topics discussed, information gathered, a summary of the feedback received, if any, and a brief explanation of how the feedback was taken into account, or the reasons why it was not. The log may be supported by multimedia (photo, video) records of the meetings if available, and written documents that were discussed or issued in relations to the engagement.

The SEL will be a valuable tool providing an overview of key engagement phases, and actions within, facilitating monitoring of SEP, Sub-Project and RP implementation, resettlement process feedback, evaluation of empowerment of PAPs while agreeing the compensation packages as designed in the RPF and Sub-Project Specific Plans.

The SEL shall be managed by the Social Specialist of the PIU.

6.3 Transboundary communication

The Higher-level Objective of the Sava and Drina River Corridors Integrated Development Program (SDIP) is to facilitate integrated transboundary water resources management and development along the Sava and Drina River Corridors. Governmental bodies of each country part of the riparian countries will agree and develop River basin management plan, Integrated data management system operational and provides information for decision making and agree on a Platform for transboundary collaboration established /operational.

8. Implementation Arrangements and Institutional analysis for Stakeholder Engagement

8.1 Project enabling efforts from lessons learned

The Project recognizes that the stakeholder profile is quite diverse their expectations and orientation as well as capacity to interface with the project might be different. The project design and institutional arrangements have been drawn such as to enable mitigation of social exclusion risks and come up with types of activities and approaches to address the likely impediments arising therefrom.

Early engagement and maintenance of dialog. The FER Project supported by the Bank, that is about to be completed is a role model overall and in engagement with local communities in particular during preparation and implementation of site-specific resettlement plans

8.2 Roles and Responsibilities

Stakeholder engagement will be coordinated and led by the MAFWM/ PIU supported by the social and environmental specialist. The PIU will closely coordinate with other key stakeholders –Local Governments (line departments included), Extension Services, and local NGOs. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

Figure 1. Responsibilities of key actors/stakeholders in SEP Implementation

Actor/Stakeholder	Responsibilities
MAFWM/PIU	<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 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 Sub-Projects and engage with stakeholders.
Local Governments	<ul style="list-style-type: none">• Lead stakeholder engagement activities at the municipal and community level during land acquisition and construction works;• Coordinate with the PIU on the outreach activities;• Local focal points for GM• Administers the Grievance• Discloses all documents, distributes outreach material as needed

	<ul style="list-style-type: none"> • 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 PIU
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 PIU • Discloses all documents, distributes outreach material as needed • Administers land acquisition process

9. Grievance Mechanism

A Project level grievance mechanism (GM) will consist of a Central Feedback Desk (CFD) administered by the PIU and Sub-Project specific Grievance Desks (LGD) (collectively referred to as Grievance Mechanism (GM)) established and administered by the local Governments with representatives from the key three stakeholders PIU representative, Municipal representative and representative of the PAPs.

To ensure GM access, potential beneficiaries, communities and other stakeholders may submit grievances through channels as outlined below. The GM will provide the opportunity for continued feedback on the Sub-Projects and resolution of individual grievances during implementation. Procedures related to complaints handling will be posted on the MAFWM'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. A person/legal entity directly affected by the project through land acquisition and resettlement,
- iii. Stakeholders - people with interest in the project, and
- iv. Residents/communities interested in and/or affected by project activities.

The Central Feedback Desk (CFD) shall be effective immediately after appraisal of the Project, in order to manage and appropriately answer complaints during its different phases while the LGD shall be effective upon decision on each new Sub-Project has been taken. In addition to the GM, legal remedies

available under the national legislation are also available (courts, inspections, administrative authorities etc.).

However, the grievance mechanism for project workers required under ESS2 will be provided separately with details to be provided in the Labour Management Procedures.

MAFWM and the Local Governments respectively are responsible for establishing 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 MAFWM (<http://www.minpolj.gov.rs/>.)
- on the notice boards and websites of Local Governments
- through social media campaigns.

9.1 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 shall be publicized and shall be part of the awareness building once further micro locations of the Sub-Projects are known. So far two Sub-Projects have been identified as mature, the Flood Protection Works On the left River Bank of Sava in Popova Bara, Jarak. Within the RP prepared for these two Sub-Projects details on the GM shall be provided.

9.2 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 Serbian 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 Serbian 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 PIU's website.

Each 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.

To avoid multiple Grievances by the same person on the same subject simply because different admission channels exist, the LGD and the CGD shall weekly exchange information on grievances received and compare the Grievance logs. The centralized log at the level of the CGD will contain notes on potentially duplicated submissions. Multiple submissions, on same events, by same grievant shall be resolved by one decision, which will be stated and the grievant appropriately informed.

9.3 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 MAFWM/PIU. In order to allow full knowledge of this tool and its results, quarterly updates from the GM shall be available on the MAFWM website. The updates shall be disaggregated by gender, type of grievances /complaints and updated regularly.

9.4 Grievance Log

The PIU will 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.

9.5 Grievance admission channels

Any grievance can be brought to the attention of the GM by filling the grievance form in hard copy or on-line, or in any other format as chosen by the grievant. The Grievance form is provided in Annex 1. Any type of grievance can be submitted by mail, fax, phone, e-mail or in person using the below access details:

Ministry of Agriculture, Forestry and Water Management

PIU

To the attention of the CGD

Address Dr. Ivana Ribara 149

11070 Beograd

Telephone: +381 11 6163-600

And

Access details of each LGD to be known at later stages and to be disseminated at later stages

9.6 Monitoring and Reporting on Grievances

The CFD will be responsible for:

- Collecting data from LGD serving as local admission points on the number, substance and status of complaints and uploading them into the single regional database;
- Maintaining the grievance logs on the complaints received at the regional and local level
- Monitoring outstanding issues and proposing measures to resolve them;
- Disclosing quarterly reports on GM mechanisms.
- Summarizing and analyzing the qualitative data received from the local Grievance Admission points on the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;

The monthly social monitoring reports to the WB shall be submitted through the PIU, which shall include a section related to GM which provides updated information on the following:

- Status of GM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on number of received grievances (applications, suggestions, complaints, requests, positive feedback) and number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;

- Level of satisfaction by the measures (response) taken;
- Any corrective measures taken.

9.7 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.

10. Monitoring and Reporting of the SEP

The PIU will document, and communicate the progress and results of the project, including monitoring of the Stakeholder Engagement Plan. The PIU will be responsible for overall compilation of progress and results. Feedback and grievances received through the project GM will be aggregated and included in the social progress monitoring reports and other report at frequency as required by the WB.

10.1 Monitoring reports during construction

Monitoring reports documenting the environmental and social performance of the Project during construction will be prepared by the Social and Environmental specialists to be engaged by the PIU for the PIU and the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. Table 4 proposes a comprehensive set of indicators related to SEP performance at this stage. The achievement of indicators shall rely on information from the SEL.

Table 4: SEP Indicators to Be Documented in Progress Reports

Engagement with PAPs
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number of men and women that attended each of the meetings above
Number, location, attendance and documentation of the meetings held with the municipalities and communities or other stakeholders

For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project ESMP.
Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the report. They will summarize the view of attendees and distinguish between comments raised by men and women.
Engagement with other stakeholders
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs)
Minutes of meetings will be annexed to the six-monthly report
Number and nature of Project documents publicly disclosed
Number and nature of updates of the Project website
Number and categories of comments received on the website
Grievance Resolution Mechanism
Number of grievances received, in total and at the local level, at Tbilisi headquarters, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of LGD meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report)
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods
Workers Grievances
Number of grievances raised by workers, disaggregated by gender of workers and worksite
Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.
Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints

Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

The reporting on Environmental and Social activities conducted by PIU and the Supervision and ESMP and RP Monitoring will be the responsibility of the Social and Environmental Consultants during the construction phase will be undertaken in accordance with the requirements of the ESMP and RP.

10.1 Reporting frequency

During the Project development and construction phase, the Social and Environmental specialist will prepare monthly reports on E&S performance for the PIU and the WB which will include an update on implementation of the stakeholder engagement plan and include indicators as designed in Table 4. Monthly reports will be used to develop quarterly and annual reports reviewed. The quarterly and annual reports will be disclosed on the Project website and made available at the level of project affected Municipalities.

10.2 Involvement of stakeholders in monitoring activities

The Project provides several opportunities to stakeholders, especially Project Affected Parties to monitor certain aspects of Project performance and provide feedback. LGD at the level of each affected Municipality will allow PAPs to submit grievances and other types of feedback. Citizen/PAP surveys at the project mid-point and end stages will also allow PAPs to provide feedback on project performance. Furthermore, frequent and regular community meetings and interactions with PIU staff, will allow PAPs and other local stakeholders to be heard and engaged.

10.2 Reporting back to stakeholder groups

The PIU through the Social consultant will report back to PAPs and other stakeholder groups, primarily through public meetings in project affected Municipalities and/or Villages. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GM will be responded to in writing and verbally, to the extent possible. Sms' and phone calls will be used to respond to stakeholders whose telephone numbers are available.

11. Disclosure and Consultation requirements

Following a 14 days two-week disclosure window once endorsed by MAFWM and the WB, the draft SEP, shall be subject to Public consultations. The SEP will be disclosed in Serbian and English at the website of the MAFWM together with invitations to the Public Consultations. The consultation meetings shall be supported by sign language interpreters and special support for stakeholder with sensory disabilities, as appropriate. Additional formats like location sketches, physical models, and film presentations will be considered to communicate relevant information. The Borrower should help the public to understand technical documents, for instance, through the publication of simplified summaries, nontechnical background explanations, or access to local experts. 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 MAFWM 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.

The Public consultation shall solicit the following: (a) whether the list of identified stakeholders is accurate; (b) the proposed methods of notification and engagement (for example, where meetings and workshops may be held and how to communicate with disadvantaged or vulnerable groups); (c) the proposed extent and format of engagement (for example, the type of meetings and duration of the consultation period); and (d) the format and language of information to be provided. Stakeholder feedback on these aspects will be reviewed and incorporated in the SEP as appropriate

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.

12. Estimated Budget

MAFWM/PIU will be responsible for planning and implementation of stakeholder engagement activities, as well as other relevant outreach, disclosure and consultation activities. Based on the needs of the SEP, the stakeholder engagement/communication budget will cover the following activities: (i) development of communication strategy, (v) printed outreach materials and project documents (leaflets, ads, manuals, brochures, posters, etc.). To ensure successful SEP implementation, the Project will hire an external Social Specialist to support the PIU in outreach and social performance.

ANNEX 1 – GRIEVANCE REGISTRATION 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 www.minpolj.rs

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 on the resolution at the website as I want to remain anonymous

Preferred Language for communication ☐ Serbian ☐ 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 Agriculture Forestry and Water Management, PIU,

