

KOSOVO

FERIZAJ WASTEWATER INFRASTRUCTURE
KOSOVO



Stakeholder Engagement Plan (SEP)

October 2023

LIST OF ACRONYMS AND ABBREVIATIONS

EBRD	European Bank for Reconstruction and Development
E&S	Environmental and Social
ESP	(EBRD's) Environmental and Social Policy
LALRF	Land Acquisition and Livelihood Restoration Framework
LALRP	Land Acquisition and Livelihood Restoration Plan
MESPI	Ministry of Environment, Spatial Planning and Infrastructure
PIU	Project Implementation Unit
PR	(EBRD's) Performance Requirements
RWCB	Regional Water Company Bifurkacioni
SEP	Stakeholder Engagement Plan
WWTP	Wastewater Treatment Plant

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1 INTRODUCTION

1.1 Brief Project Description

The European Bank for Reconstruction and Development (EBRD) is considering providing financing to the Government of Kosovo to finance modernisation and reconstruction of sewerage and wastewater treatment infrastructure in Ferizaj. The water and wastewater infrastructure in Ferizaj is operated and managed by the public entity Regional Water Company Bifurkacioni (RWCB), which provides its services within the administrative boundaries of three municipalities: Ferizaj, Kaçanik and Hani i Elezit.

However, there is no wastewater treatment plant (WWTP), and a significant part of the older sections of the wastewater network is in a state of disrepair, often experiencing pipe blockages due to sediment accumulation. The deficiencies in the existing wastewater networks and the lack of wastewater treatment services have resulted in surface and groundwater pollution. Therefore, there is an urgent need for the modernisation and improvement of the wastewater infrastructure which would improve the quality of wastewater services, as well as surface and groundwater quality.

The Project is categorised “B”¹ in accordance with EBRD’s Environmental and Social Policy 2019 (“ESP”)².

The Project will be managed by a Project Implementation Unit (PIU) including representatives of RWCB and central government (relevant ministries).

In 2014, as a contribution to Kosovo’s pre-accession process, the EU funded a Feasibility Study to assess the wastewater treatment requirements for Ferizaj. In 2023, EBRD launched a Feasibility Study update by independent consultants, along with an Environmental and Social (E&S) assessment of the Project.

Based on the updated Feasibility Study, the Project will cover:

1. the **construction of WWTP** (capacity of 90,000 Population Equivalent) to serve the urban centre of Ferizaj and associated villages, as well as three villages in the adjacent municipality of Kaçanik (Koxhaj, Elezaj, Bajnica) and **construction of an access road to the WWTP** (routing yet to be defined),
2. the **extension of the existing main collector** from the current location near Gërlice village to the proposed WWTP site (around 3 km), and
3. the **construction of a small part of the new wastewater network** required to connect the main collector with the villages of Varosh, Gracke, Rakaj, Gerlice and Doganaj (less than 2 km in total), as well as three villages of Kaçanik municipality (Koxhaj, Elezaj and Bajnica) (length unknown at this moment).

The **Project benefits** include:

- The Project would collect and treat sewage from approx. 75% of the population in Ferizaj Municipality.
- All sewer discharges in the South catchment area would be intercepted and removed from the Nerodime river, immediately upstream of the adjacent Kaçanik Municipality.
- This will have a significant improvement in the Nerodime River water quality which is transboundary with North Macedonia as well as Greece, hence contributing to the EU’s Water Framework Directive. The WWTP would treat approx. 5,000 kg/day of organic wastes.
- The collector system includes capacity for future expansion and includes flows from three villages in Kaçanik municipality.
- The Project is in line with the wastewater development policies of the municipality.

¹ A project is categorised “B” when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures.

² EBRD’s ESP is available at: <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

The proposed location for the WWTP is planned to be situated on flat agricultural land, located in Kaçanik Municipality, to the south of the Gërlice village. The 8.1-hectare site is currently classified as an agricultural land and privately owned. This land will need to be permanently acquired for Project purposes (according to the initial estimates, a total of 33 privately owned land plots will be affected by permanent land acquisition). The land acquisition process is detailed in the Land Acquisition and Livelihood Restoration Framework, and will be implemented prior to construction. Based on the Framework, a detailed Land Acquisition and Livelihood Restoration Plan will be developed in consultation with affected people to manage the resettlement process once the exact nature and scope of land acquisition become known.



Figure 1-1: Planned location of the WWTP

1.2 Objectives and Scope of this Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) was developed by the PIU in order to clearly communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

The objective of this SEP is to facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with Kosovo legislation, as well as the requirements of EBRD.

This SEP is a live document that will be periodically updated by the PIU as necessary to reflect key changes in Project activities or any new developments in the Project scope.

2 REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

2.1 Local Legislation Requirements

Kosovo laws regulating information disclosure and public consultations of relevance to this Project are:

1. *Constitution of the Republic of Kosovo* stipulates that documents of state authorities must be publicly accessible, with exceptions made for privacy, trade secrets or security reasons. Additionally, it emphasises collective responsibility for the environment, ensuring public opinions are heard and considered when decisions affecting the environment are made.
2. *Law on Access to Public Documents No 06/L-081* guarantees the right of every person to have access to public documents. Public institutions are obliged to proactively publish any public documents produced, received, maintained or controlled in electronic form, through publication on the official website of public institutions, irrespective of a person's request for access. Publication is made in electronic, printed, broadcasting or in any other form which allows an access of a larger number of public.
3. *Law on Environmental Protection No 03/L-025* provides the obligation of the central and local institutions and all other authorised organisations to regularly, timely and objectively inform the public.
4. *Law on Spatial Planning No 04/L-174* contains provisions on mandatory public participation and public review during the adoption of spatial plans. Administrative Instruction No. 05/2014 contains further guidance on the principles and procedures for public participation in spatial planning.
5. *Law on Expropriation of Immovable Property No 03/L-139* includes provisions on the communication and information procedure during land acquisition (for e.g., the expropriating authority is required to send all the necessary documents and information to identified property right holders and hold public hearings on expropriation in each municipality where the affected property is located; the decision on expropriation is published in the Official Gazette and in daily newspapers, followed by a 10-day period during which stakeholders may submit written comments to the expropriating authority, etc.)
6. *Law on the Use of Languages No 02/L-37* regulates the use of official languages, as well as languages of communities whose mother tongue is not an official language, in Kosovo institutions and other public organizations and enterprises. Grants equal status to Albanian and Serbian as the official languages of Kosovo and equal rights as to their use in all institutions. All communities have the right to preserve, maintain and promote their linguistic identity.
7. *Law on Personal Data Protection, No. 03/L-215* defines the rights, responsibilities, principles, and punitive measures related to the protection of personal data and privacy of the individual. This law defines the responsibilities of the institution responsible for overseeing the legitimacy of data processing and access to public documents.

Other relevant legislation ensuring proper consultation and equal treatment before the law would include the Law on Protection from Discrimination, No. 05/L-021; Law on Gender Equality, No. 05/L-020; and Law on Protection and Promotion of Rights of Communities and their Members in Kosovo, No. 03/L-047.

2.2 EBRD Requirements

In its ESP 2019, EBRD has defined a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (Information Disclosure and Stakeholder Engagement) emphasises the importance of open, meaningful and transparent engagement with stakeholders.

EBRD's PR 10 requirements can be summarised as follows:

- The stakeholder engagement process involves **stakeholder identification and analysis**, engagement planning, information disclosure, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Engagement must begin early in the project development and continue throughout the project life cycle.
- Clients must ensure that stakeholders have **access to timely, relevant and understandable information**, and that engagement is conducted in a culturally appropriate and inclusive manner, free from manipulation and coercion. The client will disclose relevant project information, in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs appropriate. Throughout the life of the project, the client will continue to provide information to identified stakeholders on an ongoing basis.
- The client will undertake **meaningful consultation**, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest.
- To respond to stakeholders' concerns related to the project in a timely manner, the client will establish an **effective grievance mechanism** as early as possible in the project development process, to receive and facilitate resolution of stakeholders' concerns and grievances.
- Clients are required to **develop and implement a SEP** that describes how engagement will be carried out, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The client will identify project-affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable.

3 STAKEHOLDER ENGAGEMENT PROGRAM

3.1 Introduction

Communication and information channels have been designed in this SEP taking into account the specific needs of various stakeholder groups. **The PIU acknowledges the significance of meaningful and timely engagement with stakeholders to ensure the success of the Project.** Through this engagement process, the PIU aims to gather valuable feedback, comments, and suggestions from stakeholders to enhance the Project's design and maximise local benefits.

3.2 Responsibility for SEP Implementation

The PIU is responsible for Project implementation. A specific person will be appointed by the PIU to be responsible for implementation of this SEP (contact information provided in Chapter 4 of this SEP).

Contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of this SEP (see Chapter 4 for more details). The grievance mechanism requirements will be laid out in the contracts that will be signed with the contractors.

3.3 Project Stakeholders

Project stakeholders have been identified to address the different consultation requirements. Stakeholders include persons or groups that are:

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

Stakeholder mapping was carried out during the development of this SEP based on:

- site visits to the Project area
- discussions with Municipality of Ferizaj officials (Department of Urbanism and Department of Cadastre)
- discussions with Municipality of Kacanik officials (Mayor, the Cadastral Office, the Urbanism Office, and the Public Services Office)
- review of available Project documentation and media search

The identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in section 3.6. It should be noted that any stakeholders not identified at this stage of the Project may directly contact the PIU to make themselves and their needs known, and to facilitate the effective implementation of the SEP.

1) Land owners affected by land acquisition

Precise information on the exact scope of land acquisition will be available only after the development of the expropriation study as required by the Kosovo Law on Expropriation of Immovable Property. According to the initial estimates, a total of 33 privately owned land plots (covering a total of 8.1 ha) will be affected by permanent land acquisition. Based on the documentation provided by the Cadastral Office of Municipality of Kaqanik, it has been ascertained that out of the total number of landowners, 7 belong to the Serbian ethnic group, while the remaining owners are members of the national majority (Albanian). Further specific vulnerable groups will be identified in the Land Acquisition and Livelihood Restoration Plan to be developed. No physical displacement is expected as there are no structures on the land to be acquired.

It is not anticipated that additional land acquisition will be necessary for the expansion of the main collector due to its planned placement alongside the existing railway line.

At present, it remains unclear if land acquisition will be needed for the construction of access road(s) leading to the WWTP site. Also, the exact routing of the part of the new wastewater network required to connect the main collector with the villages of Varosh, Gracke, Rakaj, Gerlice and Doganaj, Koxhaj, Elezaj and Bajnica will be determined in future design stages but it is expected that the new pipelines will be placed along local roads so acquisition of private land will not be necessary. Detailed design stages in the near future will provide clarity on these aspects.

Depending on the logistical requirements of the upcoming construction phases, there might be temporary occupation of certain areas. This could be for reasons such as establishing construction camps, demarcating material laydown regions, storing topsoil, handling excavated materials, and other construction-related activities. The specifics of these requirements will be determined by the selected contractor.

2) Local communities in Ferizaj and Kaçanik who may be affected by construction works

Houses and businesses in close proximity to construction areas are expected to be temporarily affected by construction activities (related to the construction of the WWTP and access road; and expansion of existing main collector; and parts of the new wastewater network required to connect the main collector with the villages of Varosh, Gracke, Rakaj, Gerlice, Doganaj, Koxhaj, Elezaj and Bajnica). Temporary impacts and nuisances may include noise, dust, visual impacts and traffic restrictions during the construction phase.

3) Local communities in Kaçanik who may be affected by operation and maintenance

In the vicinity of the planned WWTP are only several houses (the closest one located around 300-400 meters away from the WWTP) and two smaller private factories. A significant concern for the local community during the operation phase can be potential odours released into the surrounding environment due to wastewater treatment processes and sludge treatment in the WWTP.

On the other hand, the WWTP operation and maintenance will require skilled and unskilled labour. The locals will be interested in job opportunities that might arise. Improved local infrastructure (access road leading to the WWTP) will also be a perceived benefit for the local community.

4) Current and future customers of RCWB, who will be served by the WWTP

This group of stakeholders refers to beneficiaries of the improved wastewater system, i.e., residential, commercial and institutional customers in the urban centre of Ferizaj and associated villages (Varosh, Gracke, Rakaj, Gerlice and Doganaj), as well as three villages in the adjacent municipality of Kaçanik (Koxhaj, Elezaj and Bajnica). They will be the direct users of the improved wastewater infrastructure.

Their main interests are the quality and reliability of wastewater services, service fees, consistency in service provision, as well as long-term sustainability and environmental benefits.

5) Stakeholders with a general interest in wastewater projects

This category encompasses a broader spectrum of individuals and organisations that, while not directly affected by the Project, may hold an interest in its outcomes. This includes:

- The media: Local and national media outlets play a pivotal role in disseminating information about the Project, shaping public opinion, and keeping people informed about Project updates, benefits, and any potential concerns.
- General population of the region or the country: The wider population, while not directly served by the Ferizaj wastewater system, is expected to be interested in Project's benefits through enhanced water quality of Nerodime River other positive environmental impacts.
- Environmental NGOs: NGOs, especially those with a focus on environmental sustainability and Nerodime River water quality, will be keen observers of the Project. Their primary concerns are likely to be the Project's environmental footprint, its alignment with international standards

(particularly the EU's Water Framework Directive), and its potential for setting a precedent for future infrastructure projects. *Note: Even though such organisations have not yet demonstrated a specific interest in this Project, all shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation. Any organisations interested in the Project can send their contact details to the PIU to be included in this SEP and notified directly about Project events.*

6) Relevant government authorities

This group includes regulatory bodies with oversight and vested interest in the successful completion and operation of the Project:

- Municipalities of Ferizaj and Kaçanik
- Water Services Regulatory Authority (regulates the activities of water service providers in Kosovo and ensures provision of high quality, efficient and secure services; defines service tariffs; establishes service standards; and monitors the performance of service providers)
- Inter-Ministerial Water Council (coordinating and decision-making body responsible for improving the water sector and protection of water resources and water system of Kosovo)
- Inter-ministerial Commission for Publicly Owned Enterprises (represents the Government in exercising the rights of the shareholder of the Republic of Kosovo in Publicly-Owned Enterprises such as RCWB)
- Ministry of Environment, Spatial Planning and Infrastructure - MESPI (responsible for spatial planning, land acquisition, defining the conditions for construction, environmental protection)
- Ministry of Economy (shareholder on behalf of Government of Kosovo, operates a Publicly-Owned Enterprise Policy and Monitoring Unit)
- Ministry of Finance, Labour and Transfers (borrower of funds for the Project)
- INFRAKOS (responsible for management of the railway infrastructure in Kosovo)³
- Kosovo Electricity Supply Company - KESCO (provides approvals for power supply)⁴

7) Contractors or subcontractors for construction, monitoring and supervision of works, and their employees

The contractors or the supervision engineer have not been selected yet but are a crucial stakeholder for the successful execution and delivery of the Project, ensuring safety and compliance during the construction process.

3.4 Previous Stakeholder Engagement

To date, there has been limited disclosure of information about the Project. The Municipality of Kacanik adopted a Decision of Public Interest on June 30, 2016, which was made available to the public via the Municipality's website. Previous stakeholder interactions were largely confined to discussions between RWCB and relevant governmental authorities. No efforts have yet been made to engage with the local community, and no public hearings or meetings have yet been held to discuss the Project.

Kacanik Municipality is in the process of promulgation of a new Municipal Development Plan that incorporates the proposed location of the WWTP. The *Law on Spatial Planning* required public consultations for all spatial planning documents. Presently, the draft plan is undergoing review by the Ministry of Environment, Spatial Planning and Infrastructure. Upon completion of this review, the plan will be published for public review, followed by organisation of public hearings during which stakeholders will be able to share their views and concerns about the proposed plan. The date, time and location of the public hearings will be publicly announced in advance. After the consultation process, a report

³ One of the options for the access road to the WWTP site requires to traverse the railway line running near the site, hence requiring approval from INFRAKOS, although alternative routes are possible. Also, the main collector is to be extended to the WWTP site; however, the route is adjacent to the railway line, hence requiring approval from INFRAKOS.

⁴ The electricity supply from the KESCO does not extend to the WWTP site, hence requiring approval to extend the power supply to the site.

summarising the public's comments and the responses to the comments will be made available to the public.

3.5 Planned Information Disclosure and Consultations

Effective stakeholder engagement relies on transparent information disclosure and meaningful consultations. This section details the PIU's strategy and planned activities to keep all stakeholders informed and involved throughout the Project's lifecycle.

A. DISCLOSURE OF PROJECT DOCUMENTS

The PIU will disclose the following documents as early as possible in the Project development process:

- this SEP;
- the Project Grievance Form ([Appendix 1](#) of this SEP);
- the Land Acquisition and Livelihood Restoration Framework; and
- the Non-technical Summary (NTS) of the Project.

The documents will be publicly available in **Albanian, Serbian and English** language in electronic and printed forms at:

Name of institution	Website	Address
RCWB	http://www.bifurkacioni.com/	Str. Enver Topalli, Ferizaj, Kosovo Tel. +383 (0)290 320 650 info@bifurkacioni.com
Ministry of Environment, Spatial Planning and Infrastructure (MESPI)	https://mmphi.rks-gov.net/	Former "Rilindja" media palace, 10000 Pristina, Pristina, Kosovo Tel. +383 (0) 38 200 32 003 dkp.mmph@rks-gov.net
Municipality of Ferizaj	https://kk.rks-gov.net/ferizaj/	Str. Dëshmorët e Kombit, nn, Ferizaj, Kosovo Tel. +383 (0)38 200 46 076 & 080011005 info.ferizaj@rks-gov.net
Municipality of Kaçanik	https://kk.rks-gov.net/kacanik/	Str. Emin Duraku, Kacanik, Kosovo Tel. +383 290 380 047 & 080011014

B. PUBLIC CONSULTATION MEETINGS

The PIU will schedule and hold the following **public consultation meetings** as follows:

- at least one set of meetings after the selection of the Project designer and start of development of the Main Design – to present the Project to stakeholders with the purpose of receiving feedback from local stakeholders,
- at least one set of meetings prior to start of construction – to present the Project details defined in the Main Design to all stakeholders and to receive feedback from local stakeholders.

These meetings will be held as close as possible to Project locations to take into account the needs of households such as low-income citizens and families or elderly persons whose travel options may be limited. Meetings will also be organised to take into account times accommodating the needs of agricultural workers and women. As needed, the PIU will organise separate small group discussions with any vulnerable groups or their representatives, and will identify whether any further specific assistance may be needed to ensure such groups or individuals are not excluded from or unable to participate fully in the consultation process.

The PIU will **inform all stakeholders about the exact date, time and venue where the meetings will be held** 10 days in advance through the following channels:

- Official websites of RWCB, MESPI, and Ferizaj and Kacanik Municipalities

- Announcements posted in visible places near the Project sites; buildings of Ferizaj and Kacanik Municipalities; as well as local community offices in the villages of Gerlice, Varosh, Gracke, Rakaj, Gerlice, Doganaj, Koxhaj, Elezaj and Bajnica
- Local media and newspapers in wide circulation in Ferizaj and Kacanik
- Social media

All Project-related comments and proposals will be considered by the PIU. **A brief report (“comments matrix”) on comments/proposals received and responses from the PIU will be published on the websites of RWCB, MESPI, Municipality of Ferizaj and Municipality of Kacanik.**

All meetings will be held in Albanian, Serbian or other languages in use as relevant.

Separate meetings may need to be held to cater to the needs of different ethnic groups such as Ashkali and Romani⁵.

A comprehensive consultation process will be implemented related to the land acquisition process, as outlined in the LALRF.

C. INFORMING THE PUBLIC ABOUT CONSTRUCTION WORKS

The PIU will commit to providing clear information concerning various facets of planned construction activities. This includes **specifics about the locations, anticipated commencement date, expected duration of planned works and any predicted disruptions in traffic flows and any other potential inconveniences** to the public at least 30 days before start of works through the following channels:

- Official websites of RWCB, Ferizaj and Kacanik Municipalities
- Announcements posted in visible places near the Project site, public premises, including existing premises of the LCOs
- Local media and newspapers in wide circulation in Ferizaj and Kaçanik

Once construction starts, **information boards will be placed by the contractor at the construction site(s)** to clearly display contact information for third-party concerns (contact details of the dedicated contact person designated to address any issues or concerns raised by third parties - their name, position, phone number, and email address).

D. INFORMING THE PUBLIC THROUGHOUT OPERATION AND MAINTENANCE

The results of the stakeholder engagement process will be included in Environmental and Social Reports to EBRD which will be prepared by the PIU, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism. **A summary of these Environmental and Social Reports will be prepared by the PIU annually to ensure regular reporting to stakeholders, and posted online (without any confidential information) on RWCB’s website.**

In addition, during the operations and maintenance phase, RCWB will commit to addressing any **odour concerns** as essential for maintaining good relations with the surrounding community. To effectively manage these concerns, RCWB will track community grievances through the Project-grievance mechanism and in case of complaints from local residents regarding unpleasant odours, assess the feasibility of installing effective odour control systems at key points in the WWTP where odorous gases are likely to be emitted such as activated carbon filters, biofilters or chemical scrubbers. Simultaneously, on the WWTP information board containing essential information related to the plant, RCWB will include contact information for public grievances.

⁵ In Ferizaj, Albanians form the largest ethnic group in Ferizaj Municipality at around 95%, followed by Ashkalis and Romanis, whereas in Kacanik almost 100% of the inhabitants are Albanians.

3.6 Engagement Objectives and Methods

The list of identified stakeholders and specific communication requirements are provided in the table below.

As noted previously, this list of stakeholders below may not be final, and that any stakeholders not identified at this stage of the Project may directly contact the PIU to make themselves and their needs and interests known. The SEP will be updated accordingly by the PIU. Suggestions for improvement of proposed communication methods are also welcome and can be sent to the PIU which is open to feedback from stakeholders.

Table 3-1: *Stakeholder Engagement Program*

Identified stakeholder	Specific issues or interests	Communication and engagement activities and efforts	Information/documents to be disclosed
Land owners affected by land acquisition	Acquisition of private land, restrictions on land use and access to assets and natural resources	<p><i>During the development and implementation of LALRP (in the pre-construction phase):</i></p> <ul style="list-style-type: none"> • Providing timely information on land acquisition activities and responses to questions/grievances • Developing the future Land Acquisition and Livelihood Restoration Plan (LALRP) based on targeted household level consultations and engagement (household interviews, focus group discussions, key informant interviews) • Presenting the Land Acquisition and Livelihood Restoration Framework (LALRF) and future LALRP, and discussing land acquisition issues and concerns • The LALRP will include special considerations of the needs of ethnic groups in minority and displaced persons to ensure adequate and timely information sharing. Special attention will be given to adequate use of official languages when disclosing relevant information. • With regard to any absent property owners, particularly ethnic groups in minority and displaced persons, all reasonable efforts will be utilised to properly identify and locate any absent property owners, to engage the assistance of minority community offices and/or non-governmental organisations in Kosovo if needed, and to deposit the compensation amount in a separate account at the Central Bank of Kosovo. 	<ul style="list-style-type: none"> • Information on the land acquisition process (start of the process, decision on public interest, municipal spatial plan and so on) • Information on available grievance mechanism (both the appeal procedures under the Kosovo Law on Expropriation and the Project-specific grievance mechanism set up in this SEP) • Responses to questions/grievances • Contents of LALRF and future LALRP •

<p>Local communities in Ferizaj and Kačanik who may be affected by construction works</p>	<p>Construction activities that may cause disturbances to the local population (noise, dust, vibration, access restrictions, increased traffic)</p>	<p><i>Before the start of construction works:</i></p> <ul style="list-style-type: none"> • Access to Project documents online and in the premises of RWCB, Ferizaj and Kacanik Municipality • Public meetings and providing access to the comments matrix after the meetings 	<ul style="list-style-type: none"> • Project disclosure package (SEP, NTS, Grievance Form) • Comments matrix (to be prepared after public meetings) • Information on the extent, timing and duration of planned works • Information on availability of grievance mechanism • Summarised Environmental and Social Reports (annually)
<p>Local communities in Kačanik who may be affected by WWTP operation and maintenance (several houses and businesses in the vicinity of the future WWTP)</p>	<p>Odours potentially released from WWTP operations</p> <p>Employment opportunities</p> <p>Improved local infrastructure (new access road)</p>	<ul style="list-style-type: none"> • Disclosure of information on planned construction works 30 days before start of works • Project grievance mechanism to be posted on construction sites and kept available throughout the construction process <p><i>During the operation and maintenance phase:</i></p> <ul style="list-style-type: none"> • Access to summary of Environmental and Social Reports annually • Information boards at the WWTP entrance with public grievance channel 	
<p>Current and future customers of RCWB, who will be served by the WWTP (beneficiaries of the improved wastewater system, i.e., residential, commercial and institutional customers in the urban centre of Ferizaj and associated villages (Varosh, Gracke, Rakaj, Gerlice and Doganaj), as well as three villages in the adjacent municipality of Kačanik (Koxhaj, Elezaj and Bajnica)</p>	<p>Quality and reliability of wastewater services, service fees, consistency in service provision, as well as long-term sustainability and environmental benefits</p> <p>Enhanced water quality of Nerodime River</p>	<p><i>During the operation and maintenance phase:</i></p> <ul style="list-style-type: none"> • Disclosure of information through RCWB's official website, Facebook page, media releases • RCWB's toll-free information line • RCWB's annual customer satisfaction surveys and published reports on surveys • Access to summary of Environmental and Social Reports annually 	<ul style="list-style-type: none"> • Information on WWTP benefits and any potential disruptions; service fees • Information on availability of grievance mechanism • Summarised Environmental and Social Reports (annually)
<p>Stakeholders with a general interest in wastewater projects (local and national media, general population of the region or the country, environmental NGOs as may show interest)</p>	<p>General success of the Project and alignment with international standards</p> <p>Enhanced water quality of Nerodime River and other positive environmental impacts</p>	<p><i>Before the start of construction and continuing thereafter:</i></p> <ul style="list-style-type: none"> • Online publications of Project documents and information • Local media/press releases • Public meetings and providing access to the comments matrix after the meetings • Access to summary of Environmental and Social Reports annually 	<ul style="list-style-type: none"> • Project documents (SEP, NTS, Project Grievance Form) and comments matrix • Information on the extent, timing and duration of planned works • Summarised Environmental and Social Reports (annually)
<p>Relevant government authorities:</p> <ul style="list-style-type: none"> • Municipalities of Ferizaj and Kačanik • Water Services Regulatory Authority 	<p>Issuing permits, consents and opinions in accordance with national legislation; monitoring of</p>	<p><i>Within the timeframes and in frequencies as required by each authority:</i></p> <ul style="list-style-type: none"> • Official communication channels • Consultations with government authorities in 	<ul style="list-style-type: none"> • Information on Project activities in the formats and as required by national legislation

<ul style="list-style-type: none"> • Inter-Ministerial Water Council • Inter-ministerial Commission for Publicly Owned Enterprises • Ministry of Environment, Spatial Planning and Infrastructure • Ministry of Economy • Ministry of Finance, Labour and Transfers • INFRAKOS • Kosovo Electricity Supply Company - KESCO 	<p>compliance with Kosovo legislation</p>	<p>the framework of permitting procedures</p> <ul style="list-style-type: none"> • Reporting and monitoring based on national legislation requirements 	
<p>Contractors or subcontractors for construction, monitoring and supervision of works, and their employees</p>	<p>Health and safety; labour and working conditions; environmental setting and impacts; road and traffic safety</p>	<p><i>Before the start of construction and during the entire construction process:</i></p> <ul style="list-style-type: none"> • Information through contracting • Trainings and inductions before mobilisation • Communication via supervising engineers • Toolbox talks at construction sites on health and safety topics, Chance Find Procedure and other topics • Regular reports on progress of works submitted during construction works • Workers' grievance mechanism 	<ul style="list-style-type: none"> • Information on work safety and health regulations, environmental protection requirements • Information on workers' grievance mechanism

4 GRIEVANCE MANAGEMENT

Overview

The PIU is striving to ensure that the construction of the WWTP will not result in adverse impacts for those living near the Project site or for other potentially affected stakeholders. The PIU understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for the Project. A Project-level grievance mechanism has been set up for affected communities as a process for receiving, evaluating and addressing grievances from affected communities. The PIU will implement the grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities.

Both the PIU and the contractors/supervision engineers on site will accept grievances associated with the Project. The PIU will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. This chapter includes the following supporting appendices: Project Grievance Form ([Appendix 1](#)), template of the Grievance Registry ([Appendix 2](#)), and template of the Stakeholder Engagement Registry ([Appendix 3](#)).

The following sections of this chapter elaborate the Project grievance procedure and steps. A separate grievance mechanism is available for workers.

Submitting grievances

Any concerns can be brought to the attention of PIU verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

After the start of construction works, the Project Grievance Form may also be submitted directly to the contractor for construction works or the supervision engineer, which will forward any such received grievances to PIU without delay (within 24 hours) to allow PIU to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below).

The information boards to be placed at the construction site will clearly display contact information for third-party concerns (contact details of the dedicated contact person designated to address any issues or concerns raised by third parties - their name, position, phone number, and email address).

Recording and acknowledging grievances

The PIU will record all grievances in a Grievance Registry (format provided in [Appendix 2](#)), separate from the Stakeholder Engagement Registry ([Appendix 3](#) of this SEP), which details interactions with communities and stakeholders.

All grievances will be recorded by PIU in the registry and assigned a number. Written and non-anonymous grievances will be acknowledged within 5 working days. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

- description of grievance, including an indication of the type (topic) of the grievance – such as grievances related to gender-based violence and harassment, grievances related to construction noise or dust, grievances related to inadequate storage of construction materials and equipment, etc. – to enable timely detection of most frequent incidents, ascertain trends and manage risks,
- details about the complainant profile (gender, age, location and vulnerabilities if known), to understand who and where is most affected by potentially negative impacts of the Project – note: this information will be considered confidential and only disclosed to PIU staff working on grievances,

- date of receipt of grievance and when acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures, preventive measures), and
- date of resolution and closure/provision of feedback to the complainant, including recording of level of satisfaction with the proposed resolution (see grievance close-out form below).

Assisting complainants

If the grievance is vague and not clear enough, the PIU will assist and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project and in consideration of the preferred resolution steps of the complainant.

Grievance resolution

The PIU will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. **The complainant will be informed about the proposed corrective action and follow-up of corrective action within 10 working days upon the acknowledgement of grievance.** Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

During the process of informing the complainant of the proposed action, the PIU will validate complainant satisfaction through providing a **grievance close-out form** for the resolved grievance to be signed by the complainant (if the complainant agrees) and the PIU to attest to their mutual satisfaction. The PIU will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

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

At all times, complainants may seek other legal remedies in accordance with the local legislation, including formal judicial appeal. Retaliation against complainants is strictly prohibited by law.

Contact information for sending grievances:

FERIZAJ WASTEWATER INFRASTRUCTURE PROJECT

Project Implementation Unit

Str. Enver Topalli, Ferizaj, Kosovo

Tel. +383 (0)290 320 650

E-mail: info@bifurkacioni.com

EBRD's Independent Project Accountability Mechanism

In addition to the Project-level mechanism managed by the PIU, the EBRD's Independent Project Accountability Mechanism⁶ (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

⁶ Information about the IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

5 MONITORING AND REPORTING

The results of the stakeholder engagement process will be included in **Environmental and Social Reports to EBRD** which will be prepared by the PIU, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism. A **summary of these Environmental and Social Reports** will be prepared by the PIU annually to ensure regular reporting to stakeholders and **posted online** (without any confidential information) on RWCB's website.

The reports will include, in particular, the following information:

- **Number and types (topics) of received community grievances** raised in the reporting period (e.g., grievances related to gender-based violence and harassment, grievances related to construction noise or dust, grievances related to inadequate storage of construction materials and equipment, etc. – to enable timely detection of most frequent incidents), with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism;
- **Number and types of information disclosure activities** through the media and official websites;
- **Place and time of consultation meetings held and other types of engagement activities**, with information on the number of participants, issues and concerns raised during meetings and information on how the issues raised were taken into consideration by the PIU.

The PIU will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD and the public.

[Appendix 3](#) of this SEP provides a template for tracking stakeholder engagement activities.

6 APPENDIXES

Appendix 1: Project Grievance Form

Reference Number	
Full name (optional)	
<ul style="list-style-type: none"> • I wish to raise my grievance anonymously. • I request that you do not disclose my identity without my consent. 	
Contact information	By Post: Please provide mailing address:
Please mark how you wish to be contacted (mail, telephone, e-mail).	_____

	By Telephone: _____
	By E-mail
Preferred language of communication	<ul style="list-style-type: none"> - Albanian - Serbian - English (if possible) - Other _____
Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / Grievance	
	<ul style="list-style-type: none"> • One-time incident/grievance (date _____) • Happened more than once (how many times? _____) • On-going (currently experiencing problem)
What would you like to see happen?	

Signature: _____

Date: _____

Please return this form to:

Project Implementation Unit
Str. Enver Topalli, Ferizaj, Kosovo
Tel. +383 (0)290 320 650
E-mail: info@bifurkacioni.com

Appendix 2: Grievance Registry – Template

Note: Any personal data will be processed in line with the Kosovo Law on Personal Data Protection, No. 03/L-215.

	Name of complainant	Contact information	Date received	Date acknowledged	Grievance description	Proposed solution	Date of closure	Close-out form signed (Y/N)	Grievance follow-up	Recurrence (Y/N)	Action/ notes
1.	<i>Enter name or 'anonymous'</i>										
2.											
3.											

Appendix 3: Internal Stakeholder Engagement Registry – Template

Note: Any personal data will be processed in line with Kosovo Law on Personal Data Protection, No. 03/L-215.

	Stakeholder category and name	Type of engagement	Date of engagement	Key issues/concerns	Follow-up action agreed	Notes on progress
1.	<i>(E.g., NGO, affected resident, cultural heritage institute...)</i>	<i>(E.g., official meeting, presentation, informal meeting...)</i>				
2.						
3.						