

*November 2020*

# **Integrated Water and Hydropower Development in the Drina River Basin in the Western Balkans Region**

## **INTRODUCTION TO STAKEHOLDER ENGAGEMENT FRAMEWORK (SEF)**

**November 2020**

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## 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 Integrated Water and Hydropower Development(s) in the Western Balkans Region for which a Stakeholder Engagement plan will need to be prepared.

**Project-affected parties:** Includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.

**Other interested parties:** 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.

**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:** Is the continuing and iterative process by which the Borrower identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It takes into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges. Engagement begins as early as possible in project identification and subsequent preparation because early identification of and consultation with affected and interested parties allows stakeholders views and concerns to be considered in the project design, implementation, and operation

**Recalibrating Stakeholder engagement:** Adapting activities of stakeholder engagement in the times of the COVID-19 pandemic and the need for physical distancing

**Stakeholder Engagement Framework (SEF):** This Framework document prepared to guide development of sub-project specific SEPs, and ensure effective stakeholder engagement while transitioning towards them.

**Stakeholder Engagement Plan (SEP):** Sub-project specific document assisting in effective engagement with stakeholders throughout the life of the project and specifying ground rules who, when, why and how should be receiving information, providing feedback and be meaningfully consulted. These will be prepared as soon as the technical and technological details, stakeholder groups, and schedule of activities are known.

**Project life:** The course any project takes starting with the identification of a proposed project proceeding through the development phase including the economic, financial, environmental and social assessment ultimately with negotiations between Borrowers and the Financing Institutions and project implementation and ending with the closure and decommissioning of the project.

## List of Abbreviations & Acronyms

### 1. Introduction

#### 1.1 Project description and context

Major part<sup>1</sup> of the Drina River Basin (DRB) covers three countries Bosnia and Herzegovina (BiH), Montenegro (MNE) and Serbia (SER) respectively (Hereinafter collectively referred to as: **The Countries**). In the attempt to capitalize the Countries's existing experience, procedures, good practices and lessons learned from other water sector developments with the focus on hydropower, an inter-countries integrated approach to streamline the stakeholder engagement process is recognized as valuable at the same time ensuring adherence to national and international commitments and requirements.

Hydropower is a crucial contributor for the integrated development and climate change adaptation in the DRB and neighboring areas. Currently eight conventional hydropower plants (HPP) are operating in the DRB. Majority of power plants have been commissioned in the 1960s of the last century, with HPP Višegrad (BiH) as the latest addition in 1989.

In order to address diverse future needs, there is a necessity to better balance hydropower generation and other use of water resources in the DRB. Countries of the DRB might be interested in assessing the options for construction of greenfield and rehabilitation of existing hydropower plants in the DRB to which this SEF contributes. This SEF intends to guide any Country of the DRB during stakeholder engagement and is tailored so each of them can capitalize the it for development of Stakeholder Engagement Plans (SEPs).

In-depth evaluation of both the historically identified sites and potential alternative sites would be conducted. Extension of the useful life of existing assets by implementing the up-to-date rehabilitation strategies will be an important focus of attention during the planning and design stage.

National strategies and power development plans of DRB in transboundary countries have identified cost-effective options of new power supply.<sup>2</sup> Currently, all countries in the DRB develop their future hydropower generation plans separately from each other. Due to a transboundary nature of the DRB, there is a clear need to complement existing project-oriented hydropower studies with a river basin-wide assessment. Such an assessment would focus on the sustainability and optimization of hydropower development among all stakeholders, taking into account multi-purpose water use and transboundary and cumulative social and environmental impacts of these activities.

The complexity of the hydropower projects, equally in design, construction and operation, contributes to the importance stakeholder engagement labeled by a parallel complexity. This is why stakeholder engagement is best integrated into project management so the qualifying characteristics of overall risks and their drivers are well understood and considered during overall planning and

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<sup>1</sup> The Drina River Basin covers parts of Albania as well, but its share in the total basin area is negligible.

<sup>2</sup> In 2017, BiH has reviewed least-cost power development plan with the support of ESMAP, emphasizing the need for construction of more hydro capacity that would help raise its power export. According to Serbia's latest Energy Development Strategy completed in 2016, hydropower is the lowest cost renewable energy sources for Serbian power market. Similar, Montenegro's Energy Development Strategy conducted in 2015 lists near-term and long-term rehabilitation and new development of hydropower plants as a leading additional power generation course in addition to coal-fired capacity until 2030.

during adopting strategies for taking decisions. By contrasts, separating stakeholders and their engagement from the management system is unlikely to develop a partnership with stakeholders.

The ownership of hydropower projects can relax or add to their complexity. Most commonly the government owns the project or does so through an undertaking of private and public investment capital. The private sector is also drawn to these investments as they have large interest and are driven to take one of the places in the investment model. In either of the models, the respective government is always involved due to the significant impacts on the economy and environment, and the different interests cutting across various sectors and stakeholder groups including the scrutiny such projects are undergoing by the public, NGOs, international organizations, active in the water and the environment sector. The list is obviously not exhaustive as the projects require a significant period of time both for preparation (research, E&S and technical studies, approval) and implementation. The massive project timeline makes the project susceptible and to a certain extent dependent on the geo-political, economic and social changes over time but also might change the stakeholder canvas. These projects receive high publicity and public interest because of their substantial socioeconomic and environmental impacts. In cases where there are international elements involved either due to the transboundary context or due to joint implementation arrangement between two or more countries the complexity is intensified (complex decision-making paths, misinformation or misinterpretations of intended project benefits, divergent interest of parties, or difference in timelines etc.). If these complexities, and the qualifying elements are not brought to surface early at on-set, they might affect even the stages of the process anticipated to have a less complex road map.

## 1.2. Purpose and justification of the SEF

*{Here you would describe the importance of open and transparent engagement between the Project Owner and project stakeholders. If effective, such engagement can improve the environmental and social sustainability, enhance project acceptance and make significant contributions to successful project design and implementation. To formalize these efforts, a formal plan is developed identifying stakeholders, plan on their engagement, setting out disclosure and consultation requirements, setting up a contextually appropriate grievance mechanism and design adequate avenues to report back to stakeholders but also allow continuous feedback to be received. Also you could decide to make use of the World Bank Environmental and Social Framework and ESS10 in particular}*

*{The Purpose of The SEF would be described such as : (i) stakeholder identification and analysis methods; (ii) planning engagement modalities, their timing and effective communication tools for consultations and disclosure; (iii) defining what documents, when and how will be disclosed and discussed with stakeholders, (iv) defining roles and responsibilities of different actors in implementing the SEF and subsequent SEPs; (v) defining a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to i.e. the project's Grievance Mechanism (GM) and (vi) providing feedback to stakeholders. }*

## 1.2 Scope and structure of the SEF

The stakeholder engagement will be integrated into project's environmental and social performance and project design and implementation. The scope of the SEF follows the World Bank's ESS10 requirements and relies on the international treaties each of the Countries is signatory to. The adequacy of the engagement methods shall be part of the Monitoring & Evaluation (M&E) segment of the Project to be regularly conducted. Outcomes of the M&E will shape and adapt the activities as relevant.

## 1.3. Methodology

*{Here you would describe the best approach such as Openness and early on and life-cycle approach: Informed participation and feedback, Inclusiveness and sensitivity, Adaptive engagement management.*

*{Here we would generally add how the Framework will serve the preparation of the specific Stakeholder engagement Plans}*

## 1.4 Alternative approaches due to COVID-19 imposed restrictions- Recalibrating Stakeholder engagement

*{This section would adapt alternative strategies in the time of COVID-19 restrictions such as for instance small groups consultations if smaller meetings are permitted, or making reasonable efforts to conduct meetings through online channels (e.g. WebEx, zoom, skype etc.); where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders ;leveraging official Government's / Project/Implementing Entities website(s), ViberApp groups etc.}*

## 2. Policy and Regulatory Framework for Stakeholder and Citizen Engagement in Countries of the Drina River Basin including international obligations towards riparian Countries

### 2.1 Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters

*{This section would investigate the commitment to engage with citizens in the Countries of the DRB and how the recognition of importance of citizen engagement is embedded in their legal systems and clearly recognized by the mandatory procedures provided by individual laws. In addition a comparison to the EU Water Directive (2000/60 as amended in 2014) and how this has been transposed to the national legal frameworks. For example BiH, Montenegro and Serbia have accessed the Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters }*

*{Also a overview per each Country of the DRB that decides to utilize this Framework would be presented as is giben as an example below for BiH}*

**Error! Reference source not found.** below contains legal requirements for the public participation relevant for this Project.



**Table 1: Bosnia and Herzegovina`s, legal requirements for the public participation relevant for this Project**

{Here we would explore the exact Role and responsibilities of each stakeholder and their overall responsibilities to permitting, transboundary communication, approval and alike}

Bosnia and Herzegovina	
<i>Law on Free Access to Information in BiH</i> <sup>3</sup>	<p><b>Free Access to Information</b></p> <p>According to this Law every natural and legal person has the right to access to information in control of a public authority, and every public authority has the obligation to disclose such information. This right of access is subject only to formal actions and restrictions which are explicitly defined by the Law on Free Access to Information in BiH.</p>
Federation of Bosnia and Herzegovina	
<i>Law on Free Access to Information in FBiH</i> <sup>4</sup>	<p><b>Free Access to Information</b></p> <p>This Law ensures the rights of citizens to information and stipulates that all citizens and legal entities have the right to access information in the control of a public authority, and each public authority has a corresponding obligation to disclose such information.</p>
<i>Law on Environmental Protection of FBiH</i> <sup>5</sup>	<p><b>Public consultations during Environmental Impact Assessment (EIA) procedure</b></p> <p>This Law stipulates that every person and every organisation must have adequate access to information regarding the environment which is at the disposal of public authorities, including information on hazardous materials and activities in their communities, and be enabled to participate in the decision-making process. This Law also regulates the Environmental Impact Assessment (EIA) procedure and prescribes that public hearings must be organised for projects that require an Environmental Impact Assessment. The EIA must be made available to the public and a copy sent to relevant authorities and other interested parties, allowing 30 days for submitting comments, after which a public hearing is organised, and the public invited via printed (or electronic) media/radio/TV, at least 15 days in advance. The Environmental Permit is issued after the EIA is revised and all the relevant comments received from interested parties are taken into consideration.</p>
<i>Decree on Single Methodology for Developing Spatial Planning Documents</i> <sup>6</sup>	<p><b>Public consultations for spatial planning documents</b></p> <p>In line with this Decree, public participation must be ensured during all stages of development of spatial planning documents. Spatial plan developers are required to prepare a Public Participation Program, which includes provisions for public involvement at all stages. In addition, spatial</p>

<sup>3</sup>Official Gazette of BiH, No. 28/00, 45/06, 102/09, 62/11, 100/13

<sup>4</sup>Official Gazette of FBiH, No. 32/01, 48/11

<sup>5</sup>Official Gazette of FBiH, No. 33/03 and 38/09

<sup>6</sup>Official Gazette of FBiH No. 63/04, 50/07 and 84/10

	planning documents must contain evidence of public consultations, such as minutes from public hearings, etc.
<i>Law on Spatial Planning and Land Use at FBiH Level</i> <sup>7</sup>	<b>Public consultations during the issuing of construction permits</b> According to this Law, prior to issuing of Construction Permits, Federal Ministry of Spatial Planning has to provide public access to the Main Design, and inform the public by means of a public announcement. The public is allowed 15 days for submission of comments.
<i>Law on Expropriation</i> <sup>8</sup>	Public Consultations not required and the land acquisition intention is communicated through the declaration of Public interest, and later on through written information
<b>Republika Srpska</b>	
<i>Law on Free Access to Information</i> <sup>9</sup>	<b>Free Access to Information</b> This Law ensures the rights of citizens to information and stipulates that all citizens and legal entities have the right to access information in the control of a public authority, and each public authority has a corresponding obligation to disclose such information.
<i>Law on Environmental Protection</i> <sup>10</sup>	<b>Public consultations during Environmental Impact Assessment (EIA) procedure</b> Some of the basic principles which this law promotes are: public participation, access to information and decision making on issues which aim to protect the environment. Environmental impact assessment procedure is conducted in two stages with public involvement possible only in the second stage (in the form of public hearings on the EIA Study). Public Hearings must be no later than 60 days from the application date. They may be attended by all interested parties, competent authorities, organisations, NGOs and others. After the Public Hearing the documents have to be available for review for another 30 days and subject to written comments from interested parties. The Developer/Project Manager must submit their preliminary expert opinions on the comments within 15 days. The Competent Ministry must then within 15 days provide their opinion and recommended amendments to the EIA Study. The application for Environmental Permit is subject to public disclosure for 30 days which is announced by the Competent Ministry in the daily newspaper and on the community, bulletin boards in municipalities. During this period, interested public can provide their comments. This is reflected in the Environmental Impact Assessment and the Environmental Permit processes.
	<b>Public consultations during Strategic Environmental Impact Assessment (SEIA) procedure</b>

<sup>7</sup> Official Gazette of FBiH, No. 2/06, 72/07, 32/08, 4/10, 13/10, 45/10

<sup>8</sup> Official Gazette of FBiH, No. 70/07, 36/10, 25/12, 34/16

<sup>9</sup> Official Gazette of RS, No. 20/01

<sup>10</sup> Official Gazette of RS, No. 71/12 and 79/15

	Strategic environmental impact assessment (SEIA) of spatial plans and programs is regulated by this Law and includes involvement of the public and public hearing announced in the daily newspaper.
<i>Law on Physical Planning and Construction</i> <sup>11</sup>	<p><b>Public consultations for spatial planning documents</b></p> <p>This Law regulates the development and adoption of spatial and urban plans, which are all subject to a public disclosure and consultation process. The disclosure and consultation requirements in the Law are summarized below:</p> <ul style="list-style-type: none"> <li>• The institution managing the development of the plan is obliged to consult all relevant stakeholders (from various sectors such as: chamber of commerce, planning institutes, water authorities, traffic authorities, health authorities, environment protection and agriculture authorities, etc.) and obtain their opinions and agreements on the draft plan.</li> <li>• The draft plan has to be publicly disclosed, for at least 30 days, during which grievances can be submitted in writing and during which public consultations are held.</li> <li>• Public disclosure is announced in at least two daily newspapers, at least two times during the consultation period (at least 8 days in advance, and 15 after the beginning of public consultation) and is organized in each affected municipality.</li> <li>• The institution developing the plan (and the plan council, if one is appointed by the relevant assembly) processes grievances, incorporating into the draft plan those that are accepted and providing explanations regarding those that are not accepted. The explanations as to why certain grievances were not accepted are submitted with the draft plan to the relevant assembly.</li> <li>• The adopted plan is a public document and is permanently disclosed by the urban planning administration.</li> <li>• Land Sub-division plans and Urban and technical requirements for construction are not subject to consultations prior to the adoption, only a discussion at the local municipal assembly session is mandatory.</li> </ul>
<i>Law on Expropriation</i> <sup>12</sup>	<p><b>Engagement during Land acquisition</b></p> <p>The law requires delineation of the project area including census of land to be disclosed publicly before the public interest is declared. A period of 15 days for feedback is provided. Once individual proposals for land acquisition are submitted the engagement continues.</p>
<b>Brčko District</b>	
<i>Law on Free Access to</i>	<b>Free Access to Information</b>

<sup>11</sup> Official Gazette of RS, No. 40/13, 106/15, 3/16, 84/19

<sup>12</sup> Official Gazette of RS, No. 112/06, 37/07, 110/08, 79/15

<i>Information in BiH</i> <sup>13</sup>	According to this Law every natural and legal person has the right to access to information in control of a public authority, and every public authority has the obligation to disclose such information. This right of access is subject only to formal actions and restrictions which are explicitly defined by the Law on Free Access to Information in BiH.
<i>Law on Environmental Protection</i> <sup>14</sup>	<b>Public consultations during EIA procedure</b> This Law regulates that every person and every organisation must have adequate access to information regarding the environment which is at the disposal of public authorities, including information on hazardous materials and activities in their communities, and be enabled to participate in the decision-making process. It regulates in detail the access to information during EIA procedure. According to this Law, after the Investor submits the EIA Study to the department for Spatial Planning and Property Affairs of BD, the Department makes the EIA Study available to the public, allowing 30 days for receiving comments. The Department of Spatial Planning and Property Affairs is obliged to organize a public hearing as near as possible to the sub-project location, and to invite the public to consultations. After completion of the public consultation and after the EIA Study is evaluated and all the relevant comments received from interested parties incorporated, the Department approves the EIA Study within 30 days from EIA Study receipt, and issues the Environmental Permit (within 30 days following the approval of the EIA Study).
<i>Rulebook on the content, manner of drafting and adoption of spatial planning documents in BD BiH</i> <sup>15</sup>	<b>Public consultations for spatial planning documents</b> Pursuant to this Rulebook, public participation must be ensured after drafting spatial planning documents. The spatial plan developer defines with a conclusion the draft version of the spatial planning document. This conclusion contains time and venue as well as the way of presenting the draft spatial planning document to the public. The public disclosure lasts for 30 days. The public must be informed about the presentation of the draft spatial planning document via media and in the premises of the affected local communities. The spatial plan developer has to inform the public about the venue and time of the public hearing which must be organised in the last third of the time the draft spatial plan is disclosed.
<i>Law on Expropriation</i> <sup>16</sup>	<b>Land acquisition</b> The Law requires a public interest to be declared and a detailed land take design prepared. The Public interest is disclosed while the design is submitted to the relevant authority together with the spatial plan. Once the proposal for land acquisition has been submitted, such request shall be registered with the land registry at which time the owner is officially

<sup>13</sup>Official Gazette of BiH, No. 28/00, 45/06, 102/09, 62/11, 100/13

<sup>14</sup>Official Gazette of BD BiH, No. 24/04, 01/05, 19/07, 09/09

<sup>15</sup>Decision on the adoption of the Rulebook No. 01.1-02-028213/09 from 2 September 2009

<sup>16</sup> Official Gazette of BD, no. 26/04, 19/07, 02/08, 19/10, 15/11 and 18/18

	notified. This notification is followed by individual hearings with each land owner impacted by the expropriation,
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## 2.2 The Espoo Convention (1991) Convention on environmental impact assessment in a transboundary context done at Espoo

*{This section would explore how the 1991 Espoo convention (in force since 1997) can be advanced in this application}*

The general aim of the Espoo Convention is to “ensure environmentally sound and sustainable development” through the prevention, reduction and control of significant adverse transboundary environmental impacts from proposed activities. More specific objectives are to “enhance international co-operation in assessing environmental impact in particular in a transboundary context”, and “to give explicit consideration to environmental factors at an early stage in the decision-making process” (Espoo Convention 1991). The last-mentioned objective recalls the concept of prevention, a core value in EIA. In line with the Convention, the objective of EIA, the Convention’s principal mechanism is to ensure that environmental factors are considered in decision making of development proposals and to anticipate, avoid, minimize or offset environmental impacts of these proposals; this will lead to promote development that is sustainable and optimizes resources use (IAIA 1999).

The countries that ratified the Convention are called parties or members of the Convention. The Convention defines environmental impacts in a broad sense meaning “any effect caused by a proposed activity on the environment including human health and safety, flora, fauna, soil, air, water, climate, landscape and historical monuments or other physical structures or the interaction among these factors; it also includes effects on cultural heritage or socio-economic conditions resulting from alterations to those factors” (Espoo Convention 1991).

## 2.3 World Bank standards on Stakeholder Engagement, Citizen engagement and Projects on International Waterways

### 2.3.1 The World Bank Environmental and Social Standard on Stakeholder Engagement ESS10

*{Here we would describe the new World Bank’s Environmental and Social Framework (ESF)<sup>17</sup> came into effect on October 1, 2018. The Environmental and Social Standard (ESS) 10 targets “Stakeholder Engagement and Information Disclosure”. The provisions of the Standards are to be read in conjunction with other applicable ESSs}.*

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<sup>17</sup> [www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards](http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards)<sup>17</sup>

### 2.3.2 World Bank requirements on Citizen Engagement

*{ Here we would describe how Citizens play a critical role in advocating and helping to make public institutions more transparent, accountable and effective, and contributing innovative solutions to complex development challenges. The Strategic Framework for Mainstreaming Citizen Engagement in WBG Operations<sup>18</sup> would help in identifying the citizen engagement as the two-way interaction between citizens and governments.*

### 2.3.3 World Bank Operational Policy OP 7.50 Projects on International Waterways

*{Here we would describe how international aspects of a project on an international waterway are dealt with at the earliest possible opportunity}*

## 3. Summary of previous stakeholder engagement activities

### 3.2 Past Stakeholder Engagement for HPP Project<sup>19</sup>

- *{This chapter would describe how the Espoo Convention has been advanced by the DRB Countries,; what past stakeholder engagement has been conducted. The status of environmental permit. The previously undertaken stakeholder engagement. Prior to issuing environmental permits, there must have been public consultations held etc. Also, lessons learned would be included here and how to turn challenges into opportunities from these, especially those that started operations in recent past. These could be smaller HPPs. The objective is to highlight what worked well...and what were the gaps in stakeholder engagement}*

## 4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

*{This chapter would identify the Two broad categories of stakeholders are recognized with the third cutting across both:*

*1) **Project Affected Parties** – These includes persons 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 i.e. Individuals or households most likely to observe/feel changes from environmental and social impacts of the project,*

*2) **Other interested parties (OIPs)**- These include 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, and*

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<sup>18</sup> [https://consultations.worldbank.org/sites/default/files/materials/consultation-template/engaging-citizens-improved-resultsopenconsultationtemplate/materials/finalstrategicframeworkforce\\_4.pdf](https://consultations.worldbank.org/sites/default/files/materials/consultation-template/engaging-citizens-improved-resultsopenconsultationtemplate/materials/finalstrategicframeworkforce_4.pdf)

3) **Disadvantaged /Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status<sup>20</sup>, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. }

#### 4.1 Project Affected Parties

*{In the context of development of HPP persons adversely affected by impacts or issues include, but are not limited to the following categories (i) people whose land will be expropriated; (ii) people who need to physically relocate to a new location, (iii) people whose livelihoods need to be reestablished; (iv) people whose culture and lifestyle, as well as relationship with the land and natural resources on which they are dependent, are affected as a result of the project; (v) people whose access to natural resources is affected i.e. direct, downstream and upstream water users and ecosystem services users; (vi) people who might face increased pollution, health impacts or inconvenience during construction etc., (vii) people whose businesses are temporarily affected during construction activities related to the project, (viii) intended beneficiaries of the proposed project (ix) persons residing in the project area including areas of associated facilities, (x) women, etc.}*

#### 4.2 Other Interested Parties

'Other Interested Parties' constitute individuals, groups, entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Accordingly, there are a number of other stakeholders who have a stake, have expressed, or may express interest due to a variety of reasons. They include project implementing agencies, project partners, political institutions, service providers, host communities, civil society organizations, NGOs, religious institutions, political authorities, academic institutions, and project beneficiaries. The groups below are identified as key stakeholder groups having interest and a certain ability to influence the project.

#### 4.3 Disadvantaged or Vulnerable Individuals or Groups

*{This chapter would describe Disadvantaged / vulnerable individuals or groups 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. As an example, these could be elderly 65+, people with chronic medical conditions, Women, People with disabilities of any nature regardless if under*

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<sup>20</sup> Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

*permanent care or self-cared, Single parent headed households, male and female; Economically marginalized and disadvantaged groups and groups alike}*

#### 4. 4 Summary of stakeholder engagement needs and Analysis of their Interest and Influence

*{This chapter would identify the key stakeholder groups and categories, the nature of their interest in the project and their level of interest in and influence over the project and is based on the color code in the matrix below*

**Level of Influence**

<b>High</b>	<b>Involve/engage</b>	<b>Involve/Engage</b>	<b>Partner</b>
<b>Medium</b>	<b>Inform</b>	<b>Consult</b>	<b>Consult</b>
<b>Low</b>	<b>Inform</b>	<b>Inform</b>	<b>Consult</b>
	<b>Low</b>	<b>Medium</b>	<b>High</b>

**Level of Interest**

Table 1: Interest and influence matrix *example*



Project Stakeholder Group		Nature of interest	Level of interest	Level of Influence	Level of engagement	
Project Affected People	Individuals	Affected by past and future land acquisition and resettlement for both the accumulation and associated facilities	Interest in impacts to their assets and livelihoods for construction purposes but also for orphan, unviable land and understanding the compensation procedure	High	Medium	Consult
		Downstream river users	Interest in project impacts and impact to wellbeing, interest in disruptive impacts of the construction works and operation	High	Medium	Consult
		River users at and around the physical footprint of the project	Interest in project impacts and impact to wellbeing, interest in disruptive impacts of the construction works and operation	High	Medium	Consult
		Upstream river users	Interest in project impacts and impact to wellbeing	High	Medium	Consult
		Ecosystem service users	Interest in project impacts and impact to wellbeing and livelihood	High	Medium	Consult
		Passengers	Concerns about disruption of traffic, interested in alternative lines during rehabilitation works on the line	High	Low	Inform
		Commuters	Avoid adverse impacts from diversion of traffic, in expectation of efficient and safe transport service	High	Medium	Consult
		Tourists (national and foreign)	Concerns about accurate information on construction and rehabilitation works affecting their travel itinerary	High	Low	Inform
	Communities	In the project areas	Concerns about community health and safety, traffic construction related impacts (noise, dust, damages, emissions, vibrations)	High	Medium	Consult

Project Stakeholder Group		Nature of interest	Level of interest	Level of Influence	Level of engagement	
Other Interested Parties	Downstream communities	Concerns about community health and safety and biodiversity impacts, climate changes and climate related impacts (flooding)	High	Medium	Consult	
	Upstream communities	Concerns about community health and safety, biodiversity impacts and impacts to natural resources and biodiversity, climate changes and climate related impacts (drought)	High	Medium	Consult	
	Legal Entities	Businesses operating in the project area	Concerns about disruption in carrying out the circle of freight transport	High	Low	Inform
		In the project areas of Sub-Projects	Concerns about disruption of business and operation activities	High	Low	Inform
	Ministries of Finance Line ministries	Ministries of Finance	Loan Agreement oversight	High	High	Partner
		Line ministries	Main counterpart for project implementation and permitting authority	High	High	Partner
		Project Implementing Entity for the HPP	Project management and implementation, oversight, reporting, financial, environmental and social risk management, grievance management, SEF and subsequent SEPs implementation and coordination	High	High	Partner
	Local Governments (including line departments: land management, economic	Serve as first point of contact, conduct field outreach, facilitate two-way communication	Medium	Low	Inform	

Project Stakeholder Group		Nature of interest	Level of interest	Level of Influence	Level of engagement
Other Interested Parties	Government Agencies and institution	development, environment) Various Government Inspections such as Labor, Construction etc.	High	Medium	Consult
	Riparian Countries	As relevant Interested in E&S transboundary impacts and enforcement of legal requirements of consultation and engagement			
	FI	Local, regional and international financial institutions Interest in participating in development of the project	High	High	Partner
	Academia	Academic institutions (e.g. Faculty of transport and Traffic Engineering) Potential concerns over regarding environmental and social impacts and project designs The project may provide a knowledge sharing avenue in the area of hydropower generation and sustainability			
	Associations, NGO	NGO s national and international (please refer to Appendix 2 for a detailed overview) Interested in project benefits. Interest in procurement and supply chain, potential environmental and social as well as community health and safety	High	Medium	Consult
	Legal Entities (private or other)	National and international Contractors and Engineering Consultancies Interested in participating in various bidding procedure			
			Medium	Low	Inform
			High	Medium	Consult

Project Stakeholder Group		Nature of interest		Level of interest	Level of Influence	Level of engagement
Other Interested Parties	Media	National media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the project, ensures its visibility and facilitates stakeholder engagement	Medium	Low	Inform
	Individuals	Low-skilled, semi-skilled and high-skilled workers	Positive externalities beneficiaries through potential employment opportunities	High	Low	Consult
<b>Vulnerable group</b>	Individuals	Affected by land acquisition and resettlement if any that will need to relocate	Interest in project impact on their livelihoods and understanding the compensation procedure and additional support and assistance in restoration of living standards.	High	Low	Consult
		Affected by activities, construction works, and alike	Interest in how the project can and will address drivers of their vulnerability and not exacerbate these.	High	Low	Consult
		Affected by inequitable access to project benefits and instruments	Interest in project benefits (e.g. project-dependent and long-term employment)	High	Low	Consult

#### 4.5 Stakeholder expansion

*{The project will have prevalent number of groups of people and economically differentiated groups who are interested in the project on different levels and may need to revisit the list of stakeholders and verify if there is a need to expand the list and engage with other stakeholders. This will be facilitated by filling out the stakeholder expansion questionnaire at critical points in project development }*

#### 4.6 Gender analysis, actions and indicators

*{How Hydropower projects might affect women and men in different ways, either by imposing a disproportionate share of environmental and social impacts on women or through an inequitable distribution of benefits. Therefore, in engaging relevant stakeholders, it is necessary to assess information about interests and opportunities of the hydropower sector as well as constraints faced by women in affected communities. This would be explored further in this chapter what data will be obtained to understand the context and factors that influence gender differences as well as women's participation in natural resources and community decision making and the ecosystem services. The stakeholder engagement activities will also engage women's groups to examine how these issues could impact livelihoods, gender relations and roles of women - and what kind of actions and solutions are needed to enhance equity and avoid adverse effects. }*

#### 5. Summary of project stakeholder engagement program.

The main goal of the stakeholder engagement program is to inform, disclose and consult on various project documents and activities early on to establish a dialogue with Project Stakeholders from project planning through implementation and operation. Engagement program

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
<i>Pre-Construction</i>	<b>Affected Parties riparian states</b>	Verification of the formal Notifications as per Article 3, of the Espoo Convention Formal Notification under OP 7.50	Formal letter to the designated Point of Contact (refer to Appendix 1 for details)	Once during project planning as soon as practicable	Point of contact of the Party of origin
<i>Pre-Construction</i>	<b>Affected Parties riparian states</b>	Formal Notification as per Article 3 of the Espoo Convention and OP 7.50. The information requirements fall into three main categories: (a) Information needed for the affected Party to make a decision on its participation in the ESIA process; (b) Information needed from the affected Party to assist in the assessment of transboundary environmental impacts and information needed to facilitate its participation and input to the ESIA process; (c) Information needed by the public and authorities in the potentially affected country to participate in the process.	Formal letter to the designated Point of Contact (refer to Table in Appendix 1)	Once during project planning as soon as practicable	Point of contact of the Party of origin
	<b>Affected Parties</b>	Given the above type of information, a three-stage	Providing or requesting information and stages may be	This step is to commence as soon as	The first stage of notification is

		<p>notification procedure may be appropriate to ensure all of the information needed by each Party is conveyed to that Party.</p> <p>The notification procedure can be divided into three stages:</p> <p>(a) Stage one: Notification of the proposed activity to the affected Party</p> <p>(b) Stage two: Request for and transfer of information from the affected Party;</p> <p>(c) Stage three: Public notification of the proposed activity, ESIA process and opportunities for public participation and consultation.</p>	<p>combined to expedite the process. The form can be either letter or table form (An example of a table that may be used is given in Appendix 1)</p>	<p>practicable and then once the ESIA is prepared</p>	<p>prepared by the designated authority in the country where the activity is proposed.</p> <p>The second stage of notification is the request for information from the affected Party, assuming that the response by the affected Party is such that it intends to participate in the EIA</p>
	<p><b>Party of origin / Beneficiary State</b></p>	<p>Once the Party of origin has received the proposal from the affected Party to solicit participation from the public and authorities. Timetable for participation, consultation, comments; Specify where, and in which language(s), the EIA documentation may be inspected</p>	<p>Notification published in the affected country.</p>	<p>Once during project planning for each ESIA (in case they are multiple)</p>	<p>Affected Party</p>
	<p><b>Public of the affected Party</b></p>	<p>To be informed of the proposed activity and the ESIA process that will be applied to it, and is given an opportunity to participate in the ESIA process and to make</p>	<p>The detailed arrangements to inform the public of the affected Party may be made through bilateral or multilateral agreements.</p>	<p>Once during project planning for each ESIA (in case they are multiple)</p>	<p>Implementing Entity</p>

		comments on or raise objections to the proposed activity	In absence a proposal from the affected Party to arrange for the publication of the notice and make copies of the EIA documentation available to the public may be requested. The notification of the public should be given as a public advertisement or a special information brochure		
<b>PRE-CONSTRUCTION</b>	<b>Affected Parties as per the Espoo convention either Country of origin</b>	General information about the project, project justification, alternatives, regulatory context, baseline of the project area, impacts to be studied, E(S)IA methodology, mitigation measures, project schedule, and E(S)IA documentation content	Official Letter of Notification in line with Article 3.1, 3.2 and 3.7 of the Espoo Convention	Once in the Project Cycle to initiate the Espoo communication process	“Point of Contact” in each concerned part, which is the governmental agency (and officers) in charge of receiving and sending the information between countries. Country of origin as per Espoo convention
	<b>Affected Parties as per the Espoo Convention</b>	Confirmation/ decline of participation to the application of the Espoo Convention in line with article 3.3	Official letter of response to the Letter of Notification	Once in the Project Cycle and in response to formal letter of Notification	Affected Parties as per Espoo Convention i.e. Montenegro and Serbia



<p><b>NGOs (refer to tentative list in Appendix 2)</b></p>	<p>Information about initiation of the Espoo Convention and Long-term program Project architecture          Potential project design alternatives          Improvement of project design and mitigation of adverse impacts          Identification of environmental and social adverse, positive, cumulative and other impacts          Design of institutional arrangements</p>	<p>Public meetings, Trainings/workshops           Mass/Social Media Communication - Facebook, WhatsApp; Any other digital solution platform for stakeholder engagement.          Potentially official notification/invitation letters to NGOs</p>	<p>Once in the Project Cycle after the letter of Notification has been sent</p>	<p>Implementing entity</p>
<p><b>Project Affected Parties -</b>          People affected by land acquisition;          People residing in project area;          Vulnerable households          Community members          Upstream River users          Downstream river user          Ecosystem services dependent</p>	<p>Project architecture          Potential project design alternatives          Improvement of project design and mitigation of adverse impacts          Identification of environmental and social adverse, positive, cumulative and other impacts          Design of institutional arrangements:          Land acquisition process          Assistance in gathering officials documents for early land registration;          Compensation rates and methodology;          Project E&amp;S principles;          Resettlement and livelihood restoration options;          Grievance mechanism process          Potential Labor influx stemming from construction works</p>	<p>Public meetings.          Public notices;          Electronic publications via online/social media and press releases;          Dissemination of hard copies at designated public locations;          Press releases in the local media;          Information leaflets and brochures; audio-visual materials, separate focus group meetings with vulnerable groups, while making appropriate adjustments to consultation formats in order to take into account the need for social distancing (e.g., use of mobile technology such as telephone calls, SMS, etc.).          Disclosure of written information - Brochures, posters,</p>	<p>Project launch meetings in affected 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)</p>	<p>Implementing entity          (Environment &amp; Social Consultants, land acquisition department of Municipalities          E/S Consultant;          Municipal grievance committee</p>

		Awareness raising on Gender Based Violence (GBV) Community Health and Safety Environmental and Social risks (other than resettlement) and mitigation measures	flyers, website Information desks - In Municipalities and HQ; Grievance mechanism PAP survey - Upon completion of resettlement		
	<b>Other Interested Parties (External);</b> Municipalities Cadaster offices National and local	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)	Implementing Agency (E&S team, Chief Liaisons Officers (CLO), land acquisition department); RAP consultant
	<b>Other Interested Parties (External)</b> 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 Labor Management Procedures (applicable to the Project) for potential job-seekers	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)	Implementing Agency (E&S team, CLOs, land acquisition department)
	<b>Other Interested Parties (External)</b> Other Government	Project information - scope and rationale and E&S principles; Coordination activities;	Face-to-face meetings; Invitations to public/community meetings	As needed	Implementing Agency (E&S team, CLOs, land

	<p>Departments from which permissions/clearances are required; Other project developers reliant on or in the vicinity of the Project and their financiers</p>	<p>Land acquisition process; Grievance mechanism process</p>			<p>acquisition department)</p>
	<p><b>Other Interested Parties (Internal)</b> Other Staff of the Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers</p>	<p>Project information - scope and rationale and E&amp;S principles; Training on ESIA and other sub-management plans; Grievance mechanism process</p>	<p>Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings</p>	<p>As needed</p>	<p>Implementing Agency (E&amp;S team, CLOs, land acquisition department)</p>
<p><b>CONSTRUCTION (MOBILIZATION, CONSTRUCTION, DEMOBILIZATION)</b></p>	<p><b>Project Affected Parties -</b> People affected by land acquisition; People residing in project area; Vulnerable households Community members Upstream River users Downstream river user Ecosystem services dependent</p>	<p>Land acquisition process (land registration; compensation rates and methodology; livelihood restoration) Grievance mechanism process; Health and safety impacts Any and all Environmental and Social Management instruments (ESMF, ESMP, RP, etc.) Construction-related safety measures and pertinent plans Employment opportunities; Environmental concerns; GBV awareness-raising</p>	<p>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</p>	<p>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)</p>	<p>Implementing Agency (E&amp;S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors; NGOs/trainers; Municipal grievance committee</p>

	<p><b>Other Interested Parties (External)</b> National Agency of Public Registry; Municipalities (including Mayor's representatives in villages)</p>	<p>Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&amp;S principles; Grievance mechanism process</p>	<p>Face-to-face meetings; Joint public/community meetings with PAPs</p>	<p>Weekly (as needed)</p>	<p>Implementing Agency (E&amp;S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors;</p>
	<p><b>Other Interested Parties (External)</b> Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers</p>	<p>Project information - scope and rationale and E&amp;S principles; Coordination activities; Land acquisition process; Health and safety impacts; Employment opportunities; Environmental concerns; Grievance mechanism process Timeline of the Project</p>	<p>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</p>	<p>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)</p>	<p>Implementing Agency (E&amp;S team, CLOs, land acquisition department)</p>
	<p><b>Other Interested Parties (Internal)</b> Other Staff; Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers</p>	<p>Project information - scope, rationale and E&amp;S Principles; Training on ESIA and other sub-management plans; Grievance mechanism process</p>	<p>Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings</p>	<p>As needed</p>	<p>Implementing Agency (E&amp;S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors;</p>

<b>POST-CONSTRUCTION AND OPERATION PHASE (WITHIN LIFE OF THE PROJECT AND DEFECT LIABILITY PERIOD)</b>	<p><b>Project Affected Parties -</b>                  People affected by land acquisition;                  People residing in project area;                  Vulnerable households</p>	<p>Satisfaction with engagement activities and GRM;                  Grievance mechanism process;                  Community health and safety measures during HPP operation;                  Accessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any)</p>	<p>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</p>	<p>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)</p>	<p>Implementing Agency (E&amp;S team, CLOs, land acquisition department)</p>
	<p><b>Other Interested Parties (External)</b>                  Press and media; NGOs;                  Businesses and business organizations;                  Workers' organizations;                  Academic institutions;                  National Government Ministries;                  Local Government Departments;                  General public, tourists, jobseekers</p>	<p>Grievance mechanism process;                   Community health and safety measures during HPP operation;</p>	<p>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</p>	<p>Meetings in affected municipalities (six-monthly);                  Communication through mass/social media (as needed);                  Information desks with brochures/posters in affected municipalities (continuous)</p>	<p>Implementing Agency (E&amp;S team, CLOs, land acquisition department)</p>

## 5.1 Project outreach methods

### 5.2 Public Consultations

*{Public consultations need to be properly structured and well managed: For public hearings to constitute an effective form of consultation, it is advisable to set the rules early on (refer to text box). The essence of the Consultation process is also described in here}*

### 5.3 Mass/social media communication

How this communication tool will be deployed.

### 5.4 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. The implementing entity 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 local language. The website will also provide information about the grievance mechanism for the project. The communication material shall be in substance, content and information range adapted to respond adequately to the following questions:

- the relevant phase of the project,
- which stakeholder or group of stakeholders are targeted,
- type of information to be shared,
- feedback requirements influencing the project design and architecture,
- is immediate action to be taken,
- adverse social and environmental impacts.

### 5.5 Information Desks

Information Desks in local communities will provide local residents with information on stakeholder engagement activities, grievance management, stakeholder engagement program, advancements of the project, construction updates, contact details of the PIUs once in place. Prior to Project start in the Pre-construction permitting phase directly affected municipalities will be set up with information desks, at locations most suitable for information about the project to be shared with PAPs and other stakeholders. Brochures and fliers on various project related social and

## CONSULTATION PRINCIPLES

Explain objectives of consultations.

Manage Expectations.  
Agree on the agenda

Provide advance information.

Provide sufficient time for people to voice their concern – manage time adequately.

Use right moderators with skill and accepted by the community.

Don't allow a single stakeholder domination.  
Assess the need for interpretation.

Make special efforts to ensure that vulnerable – women, people with disabilities – are consulted in settings where they can express their views openly

Conclude the meeting by reiterating how the comments and suggestions received are proposed to be used



environmental issues will be made available at these information desks prepared in line with the previous section. Information desks are best placed to meet expectations of the community if housed by their trusted partners. It has proven valuable to set up such information desks to be administered by local municipal administration. Local municipalities have on-going partnership and relations with the local communities and thus trusted and expected to provide credible and reliable information. The setup of information desks shall be subject to detailed agreements between the implementing entity and the respective municipal administration.

### 5.8 Citizen perception survey and feedback

Within a month after the launch meetings within each phase is completed, or even during the launch meetings sample-based stakeholder satisfaction surveys shall be conducted to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iii) quality of the communication and dialogue with the Project owners (PIU, line ministries, GM, etc.). 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 implementing entity to identify potential design issues related to access to project benefits and adequacy of mitigation measures in place to manage adverse environmental and social impacts. The survey data will be disaggregated by age, gender and location). Survey results with proposed corrective measures will be published on the implementing entity`s website and discussed at regular consultation meetings.

### 5.9 Proposed strategy to incorporate the view of vulnerable groups

*{Here we would take into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges. Various types of barriers may influence the capacity of disadvantaged or vulnerable groups to articulate their concerns and priorities about project impacts. These barriers can be linked to sociopolitical, societal conflict, educational, or practical factors. For example, barriers can exist for ethnic, linguistic, and religious minorities; low-income households; women; youth; persons with limited mobility; or persons with disabilities}.*

### 5.10 Development of HPP SEP(s)

*{Here we would in general describe how specific Plans would be prepared for prospective HPPs when the specific locations, stakeholder groups, and specific type and associated technologies and schedule of activities for the HPP are known. These will propose targeted stakeholder engagement programs which largely depend on the details, including the footprint, geographic location and timing of the Project activities}.*

*Details of what resources will be devoted to managing and implementing the Stakeholder Engagement Plan and what budget is allocated to ensure implementation including the monitoring and evaluation activities will demonstrate the capacity and commitment to implement the SEP and activities thereunder.*

*The SEPs shall be prepared in consultation with the stakeholder and disclosed and consulted on in line with the disclosure and consultation requirements outlined in this SEF.}*

## 6 Transboundary communication

### 6.1 Transboundary engagement program

*{This chapter would build upon the requirements of the Espoo Convention for formal notifications to other riparian Countries in international waterway projects. The WB OP 7.50 distinguishes between the Beneficiary State (the state proposing the project) alike the Espoo Convention which distinguishes between Party of Origin and Affected Party and assigns the following meanings and refers to them collectively as Contracting Parties to the Convention:*

*“Party of Origin” means the Contracting Party under whose jurisdiction a proposed activity is envisaged to take place; and*

*“Affected Party” means the Contracting Party likely to be affected by the transboundary impact of proposed activity.*

*For purposes of communication it is recommendable that both the Party of origin and the Affected Party decide the designation of a “Point of Contact” in each concerned party, which is the governmental agency (and officers) in charge of receiving and sending the information between countries.}*

### 6.2 Dispute Resolution

*{This chapter would identify how the difference in EIA legislation between Countries may create misunderstandings and disputes and may affect the implementation of the Espoo Convention. During early stages an open discussion shall be initiated between the Points of contact but also at a lower operational level (with points of contact to be designated by each of the Parties i.e. Countries involved). Only as a last resort the Convention includes a formal legal dispute resolution process which should be also the guiding principle under this SEF.}*

*{This chapter could also explore establishing a permanent working group that discusses the practical matters of ongoing and upcoming applications of the Convention will be established with adequate representation. The following issues could be discussed:*

- institutional arrangements.*
- time schedules.*
- translations.*
- cost sharing and other financial matters.}*

The objective of the working group shall be to assist Parties to comply fully with their obligations under the Convention, and avoid disputes in interpretation and application of the Convention.



## 6.2 Administration of the Convention

Here the administration of the Convention would be described i.e. administrated by the UNECE Espoo Convention Secretariat, which is comprised of the following bodies (UNECE 2008):

- **Meeting of the Parties:** it is the main body that takes decisions about the reviewing of policies and methodological approaches to EIA; information exchange; seeking the services of competent international bodies for advice in methodological and technical aspects to achieve the purposes of the Convention; and adopting proposals of amendments.
- **Working group on EIA:** it is a subsidiary body of the Meeting of the parties established to assist it in implementing the Convention.
- **Implementation Committee:** established to control and assist the parties regarding their fulfilment of the Convention obligations. - **Inquiry Commission:** It is a non-permanent Commission established ad-hoc to arbitrate in case a Party requires it.
- **The Convention includes also a Bureau, and a meeting of the Signatures to the Protocol.**

## 7. Implementation Arrangements and Institutional analysis for Stakeholder Engagement /Resources

*{This chapter would describe who will be responsible for stakeholder engagement such as per example below*

### 7.1 Roles and Responsibilities

<i>Stakeholder</i>	<i>Responsibilities</i>
<i>Implementing Agencies</i>	<p><i>Ensuring that there is a clear and well-defined strategy to guide stakeholder engagement activities and that the staff, resources and systems are in place to enable the strategy and this SEP to be implemented. Tasks would include</i></p> <p><i>Plan, implement and monitor SEF/SEP activities;</i></p> <p><i>Lead and coordinate stakeholder engagement activities;</i></p> <ul style="list-style-type: none"> <li>• <i>Collect stakeholder feedback through regional workshops, satisfaction surveys and bilateral meetings,</i></li> <li>• <i>Manage the grievance mechanism at Project level, communicate grievances regularly through monitoring reports,</i></li> <li>• <i>Build capacity of implementing partners – Local Governments and GM on ESF stakeholder engagement standard and its implications;</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Manage national GM database and submit quarterly reports on the substance and quantity of grievances;</i></li> <li>• <i>Build and maintain constructive relationships with all stakeholder groups in the respective municipality (business and religious leaders, community organizations...)</i></li> </ul>
<i>Responsible Agencies/Entities for cooperation and communication with the Implementing</i>	<i>Respond to notifications and requests and participate in transboundary impact assessment, communication, disclosure and public consultation processes,</i>
<i>Local Governments</i>	<ul style="list-style-type: none"> <li>▪ <i>Support and logistics for implementing the SEF and subsequent SEPs</i></li> <li>▪ <i>Identify any issue that may result in heightened concern to provide an early warning system on community issues and communicate these to the PIU</i></li> <li>▪ <i>Receive and register any grievance voiced by project-affected parties or other interested parties and communicate them immediately to the PIU</i></li> <li>▪ <i>Support the planning and logistics for capacity-building and communication events at the village level</i></li> </ul>
<i>NGO Consultant</i>	<i>The Implementing agency will appoint an international NGO consultant to assist implementation of the SEF and subsequent SEPs</i>

## 8. Grievance Mechanism

{Here we would describe a specific grievance mechanism (GM) will be set-up for the project. }

The Project level GM shall rely on the following principles<sup>21</sup>:

**Principle 1. Proportionality: A mechanism scaled to risk and adverse impact on affected communities**

**Principle 2. Cultural Appropriateness: Designed to take into account culturally appropriate ways of handling community concerns**

**Principle 3. Accessibility: A clear and understandable mechanism that is accessible to all segments of the affected communities at no cost**

**Principle 4. Transparency and Accountability to All Stakeholders**

**Principle 5. Voluntarily, Freely and without retaliation: A mechanism that prevents retribution and does not impede access to other remedies}**

### 8.1 Raising grievances

The grievance administration principles are designed to promote the fairness of the process and its outcomes. The grievance procedures are designed to be accessible, effective, easy, understandable and without costs to the complainant. Once the Project advances use of interactive digital platforms will be further explored as these might offer valuable additional avenue for taking up grievances but also receive feedback on citizen engagement activities. The figure below offers the flowchart of the grievance process.

#### Box 3

#### PRINCIPLES OF EFFECTIVE GM DURING THE COVID-19

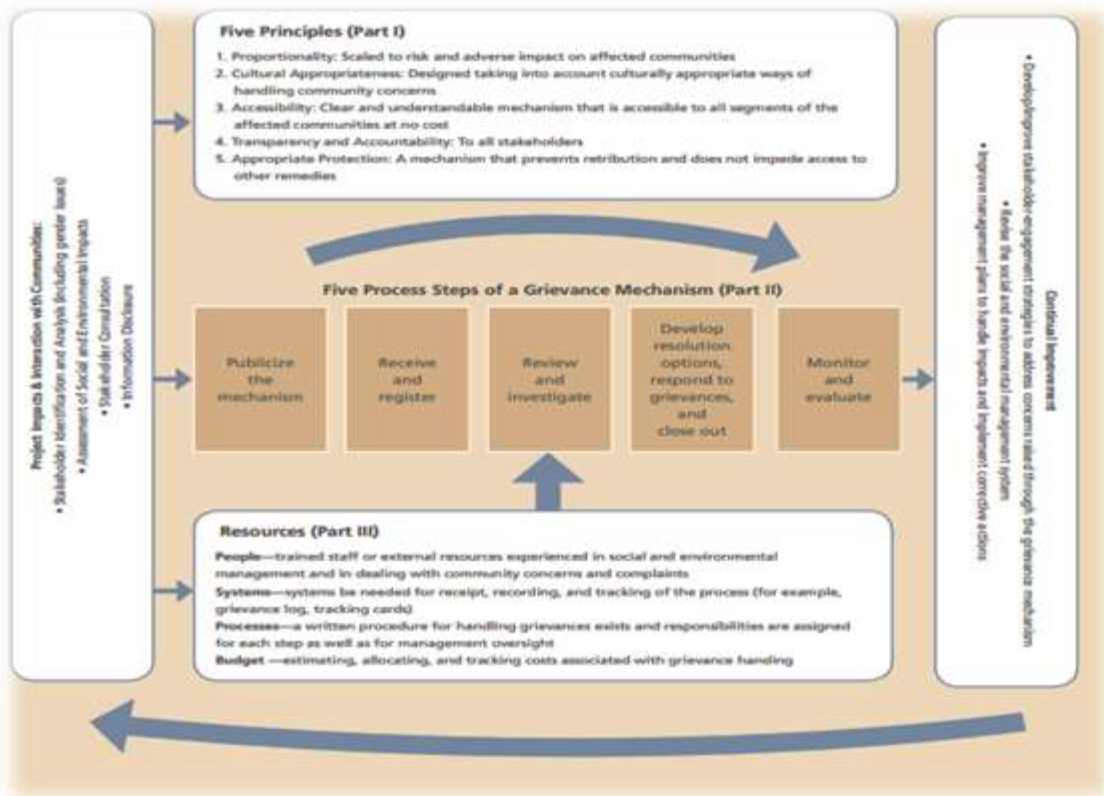
(i) Ensuring that social distancing measures are in place (i.e. meetings of grievance resolution committees, investigation of grievances),

(ii) Monitoring of existing grievance and public information mechanisms for any COVID related grievance, queries etc.; and

(iii) Directing any health and COVID-19 related queries to the Health Department, and tracking its resolution. Existing GM protocols should be adapted to the situation on the ground.

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<sup>21</sup> Principles



Description	Contact details
Implementing agency:	
Main contact:	
Address:	
E-mail:	
Website:	
Telephone:	

Further details on Grievance admission channels and points shall be publicized in the updated version of the SEF and subsequent SEPs and shall be part of the awareness building campaign.

### 8.2 Grievances administration

*{This chapter describes the steps in administering the Grievances i.e., receive, acknowledge, assign, investigate, resolve, inform and verify and closeout}*

### 8.3 Grievance and beneficiary feedback reporting

*{The role of the GM, in addition to addressing grievances, shall be to keep and store comments/grievances received and keep a grievance log administered}*

### 8.4 Keeping track of cases

*The implementing entity will maintain a grievance log as the least complicated tracking method or a database using information technologies. Either way, using a simple table format or matrix*

*or more complex database will facilitate keeping track of grievances and their outcome and will ensure that each complaint has an individual reference number and is appropriately tracked and recorded, near and long-term actions are closed out and verified by follow up process. Tracking grievance should rely on answering the following questions*

- *WHO - Details of the complainant;*
- *HOW - where, how it occurred; who was involved; complainant's story and expectation.*
- *WHEN - date and place the grievance was received and recorded, when the incident occurred Previous records of similar incidents Evidence, supporting documents and statements.*
- *Date of receipt acknowledgement returned to the complainant.*
- *Date when the Grievance Log was uploaded onto the project database.*
- *Details of corrective actions proposed (including how these were arrived at*
- *Date when the proposed corrective actions were formally sent to the complainant (upon reaching the agreement between the aggravated and the liable party);*
- *Date when the grievance was closed out;*
- *Date when the resolution notice was sent and received by the grievant;*
- *Notice of dissatisfaction with the resolution notice raised by the grievant;*
- *Information if the case had been referred to the court (if available).*

### 8.5 Reporting back to stakeholder groups

*{Options in providing Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in for example Publication of a standalone annual report on project's interaction with the stakeholders.*

- *Adopt software solutions to scale up the two-way interaction and feedback, by using survey platforms, preferable using one dashboard to make it easy to measure and understand the feedback (any platform in use and central governmental or Ministry of Health level, or alternatively /in addition (as required) SurveyMonkey or alternative online platform can be applied), in order to meet citizens' expectations for change created by their engagement, use their input to facilitate improved development outcomes;*
- *Monitoring of a beneficiary feedback indicator on a regular basis. The indicator will be determined in the updated SEP and may include: number of consultations, including by using telecommunications carried out within a reporting period (e.g. monthly, quarterly, or annually); number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; number of press materials published/broadcasted in the local, regional, and national media.}*

## 8.6 Transboundary Grievance Management

### 8.7 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](http://www.inspectionpanel.org).

## 9. Monitoring, Reporting, Disclosure and Consultation requirements

*{The Project should support monitoring and evaluation (M&E) activities to track, document, and communicate the progress and results of the project, including monitoring of this SEF and any subsequent document expanding on engagement activities. During the preparation and pre-construction phase the central government and respective institutions or individuals within shall be assigned with the responsibility for overall compilation of progress and results. Transboundary communication, activities on advancement of implementation of the Espoo Convention and other relevant activities which are expected to take place at the early offset prior to formal engagement of financing partners including the World Bank shall be subject to documenting requirements of each of the three national systems. Notwithstanding, the commitment is to go beyond, and adequate records shall be kept in line with this SEF. The feedback and grievances received through the project GM will be aggregated and included in periodical reports the frequency and substance of which shall be determined at financing close stage. This will be reflected in the SEPs.}*

## 10. Estimated Budget

*{Here we would usually identify the budget needs for successful implementation and a minimum team. For example the stakeholder engagement/communication budget will cover the following activities: (i) development of communication strategy, (ii) development of Project web-site administered by the PIU, (iii) sample-based beneficiary survey (after each round), (iv) media coverage expenditures; (v) printed outreach materials and project documents (leaflets, ads,*

*manuals, brochures, posters, etc.); (vi) regional workshops/consultation activities, (vii) transboundary communication, translation services. The tentative budget for these activities shall be provided in the updated SEF. Effective implementation arrangements would require a full time Social Specialist and a Community outreach specialist. They should both be experienced and knowledgeable experts with Graduate/advanced degree in environmental sciences, social, legal, or related discipline with a minimum of 10 years of relevant professional experience, including applied experience in Environmental & Social risk management in complex investment projects including working with vulnerable groups (international and local) The experts should have knowledge of international good practice for management of E&S risks, including World Bank ESF/Safeguards policies and International Finance Corporation (IFC) Sustainability Framework and supporting documents such as Guidance Notes, EHS Guidelines and excellent knowledge of the local laws and regulation. Previous experience with World Bank-funded projects and understanding of its requirements would be an advantage.*

## Appendices

### Appendix 1 - Notification to an affected Party of a proposed activity under article 3 of the Espoo Convention

#### **1. INFORMATION ON THE PROPOSED ACTIVITY**

##### **(i) Information on the nature of the proposed activity**

Type of activity proposed

Is the proposed activity listed in appendix I to the Convention?      Yes      No

Scope of proposed activity

(e.g. main activity and any/all peripheral activities requiring assessment)

Scale of proposed activity

(e.g. size, production capacity)

Description of proposed activity

(e.g. technology used)

Description of purpose of proposed activity

Rationale for proposed activity

(e.g. socio-economic basis, physical geographic basis)

Additional information/comments

##### **(ii) Information on the spatial and temporal boundaries of the proposed activity**

Location

Description of the location

(e.g. physical-geographic characteristics, socio-economic characteristics)

Rationale for location of proposed activity

(e.g. socio-economic basis, physical-geographic basis)

Time frame for proposed activity

(e.g. start and duration of construction and operation)

Maps and other pictorial documents connected with the information on the proposed activity

Additional information/comments

##### **(iii) Information on expected environmental impacts and proposed mitigation measures**

Scope of assessment

(e.g. consideration of: cumulative impacts, evaluation of alternatives, sustainable development issues, impact of peripheral activities)

Expected environmental impacts of proposed activity

(e.g. types, locations, magnitudes)



**Inputs**

(e.g. raw material, power sources)

**Outputs**

(e.g. amounts and types of: emissions into the atmosphere, discharges into the water system, solid waste)

**Transboundary impacts**

(e.g. types, locations, magnitudes)

**Proposed mitigation measures**

(e.g. if known, mitigation measures to prevent, eliminate, minimize, compensate for environmental effects)

**Additional information/comments**

**(iv) Proponent/developer**

Name, address, telephone and fax numbers

**(v) EIA documentation**

Is the EIA documentation (e.g. EIA report or EIS) included in the notification?

Yes No Partially

If the answer to the above is no or partially, description of additional documentation to be forwarded and (approximate) date(s) when documentation will be available

**Additional information/comments**

**2. POINTS OF CONTACT**

**(i) Points of contact for the possible affected Party or Parties**

Authority responsible for coordinating activities relating to the EIA (refer to decision I/3, appendix)

- Name, address, telephone and fax numbers

List of affected Parties to which notification is being sent

**(ii) Points of contact for the Party of origin**

Authority responsible for coordinating activities relating to the EIA (refer to decision I/3, appendix)

- Name, address, telephone and fax numbers

Decision-making authority if different than authority responsible for coordinating activities relating to the EIA

- Name, address, telephone and fax numbers

**3. INFORMATION ON THE EIA PROCESS IN THE COUNTRY WHERE THE PROPOSED ACTIVITY IS LOCATED**

**(i) Information on the EIA process that will be applied to the proposed activity**

Time schedule

Opportunities for the affected Party or Parties to be involved in the EIA Process

Opportunities for the affected Party or Parties to review and comment on the notification and the EIA documentation

Nature and timing of the possible decision

Process for approval of the proposed activity

Additional information/comments

**4. INFORMATION ON THE PUBLIC PARTICIPATION PROCESS IN THE COUNTRY OF ORIGIN**

Public participation procedures

Expected start and duration of public consultation

Additional information/comments

**5. DEADLINE FOR RESPONSE**

Date

*November 2020*

Appendix 2 – Institutional Stakeholders inclusive of NGOs

BASIN LEVEL	International Sava River Basin Commission		
STATE GOVERNMENT	BOSNIA AND HERZEGOVINA	MONTENEGRO	SERBIA
	<p>Ministry of Foreign Trade and Economic Relations of BiH State Commission on concessions</p> <p>Focal Points for Administrative Matters regarding the Espoo Convention: Ms. Srebrenka GOLIC Ministry of Spatial Planning, Civil Engineering and Ecology of the Republic of Srpska Trg Republike Srpske 1 78000 BANJA LUKA Telephone: +387 5133 9592 Fax: +387 5133 9653 E-mail: kabinetministramgr@vladars.net</p> <p>Point of Contact (as per Article 3 of the Espoo Convention) Ministry for Foreign Affairs Sarajevo c/o Permanent Mission of Bosnia and Herzegovina 22 bis, rue Lamartine CH-1203 GENEVA Switzerland Telephone: +41 22 345 8844 or 58 Fax: +41 22 345 8889</p>	<p>Ministry of Sustainable Development and Tourism</p> <p>Ministry of Agriculture and Rural Development</p> <p>Ministry of Economy Inspectorate Focal Points for Administrative Matters regarding the Espoo Convention and Point of Contact (as per Article 3 of the Espoo Convention) Ms. Brankica CMILJANOVIC Head of the Directorate of the Horizontal legislation</p> <p>Ministry of Sustainable Development and Tourism IV proleterske 19 81000 PODGORICA Telephone: +382 20 446283 Fax: +382 20 446215 E-mail:brankica.cmiljanovic@mrt.gov.me</p>	<p>Ministry of Agriculture, Forestry and Water Management</p> <p>Ministry of Mining and Energy</p> <p>Ministry of Construction, Transport and Infrastructure Inspectorate</p> <p>Focal Points for Administrative Matters regarding the Espoo Convention and Point of Contact (as per Article 3 of the Espoo Convention) EIA: Ms. Sabina IVANOVIC Head of Department for EIA</p> <p>Ministry of Environmental Protection 1 Omladinskih Brigada Str. 11070 NEW BELGRADE Telephone: +381 11 3131 356 Fax: +381 11 2601 034 E-mail: sabina.ivanovic@ekologija.gov.rs SEA: Mr. Miroslav TOSOVIC Head of the Group for Strategic Environmental Impact Assessments Department</p>

Ministry of Environmental Protection  
 1 Omladinskih Brigada Str.  
 11070 NEW BELGRADE  
 Telephone: +381 11 2690 977  
 Fax: +381 11 3132 547  
 miroslav.tosovic@kologija.gov.rs

ENTITY LEVEL  
 (BIH ONLY)

Federation of Bosnia and Herzegovina; Ministry of Energy, Mining and Industry; Ministry of Agriculture, Water Management and Forestry; Ministry of Spatial Planning; Ministry of Transport and Communications Inspectorate

Republika Srpska ; Ministry of Energy and Mining; Ministry of Agriculture, Forestry and Water Management; Ministry of Spatial Planning, Civil Engineering and Ecology; Ministry of Transport and Communications Inspectorate

Ministry of Labor, War veterans and Disabled Persons` Protection Inspectorate of Republika Srpska (includes Labor inspectorate) Government

Commission

State Electricity Regulatory Energy Regulatory Agency Environmental Regulatory Agency

Environmental and Nature Protection Energy Agency Agency

<p>COMMITTEES AND AGENCIES and INSTITUTES</p>	<p>Regulatory Commission for Energy in the Federation of Bosnia and Herzegovina</p> <p>Commission for concessions of the Federation of Bosnia and Herzegovina</p> <p>Federal Hydrometeorological Institute</p> <p>Environmental Protection Fund, Federation of Bosnia and Herzegovina</p>	<p>Regulatory Commission for energy of Republika Srpska</p> <p>Commission for concessions of Republika Srpska,</p> <p>Republic</p> <p>Hydrometeorological Institute of Republika Srpska</p> <p>Environmental Protection Fund of Republika Srpska</p> <p>Joint Energy Committee between Serbia and Republika Srpska,</p> <p>Institute for Cultural-Historical and Natural heritage Protection</p>	<p>Water Directorate</p> <p>Commission for concessions of Montenegro</p> <p>Institute for Hydro meteorology and Seismology of Montenegro</p>	<p>Republic of Serbia</p> <p>Hydrometeorological Service</p> <p>Private Public Partnership Commission of Serbia,</p> <p>Institute for Nature Conservation,</p> <p>Joint Energy Committee between Serbia and Republika Srpska</p>
<p>REGIONAL LEVEL</p>		<p>Republika Srpska</p> <p>Public Utility Vode Srpske</p> <p>Regional Office for DRB in Zvornik</p>		<p>Provincial</p> <p>Public Water management Company Srbijavode</p> <p>Public Water management Company Vojvodina Vode</p>

ENERGY PRODUCERS	Elektroprivreda Bosne i Hercegovine	Elektroprivreda Republike Srpske	Elektroprivreda Crne Gore	Elektroprivreda Srbije
LOCAL LEVEL	Bosanko-Podrinjski Canton local government water supply and sewage system Municipalities Foca and Ustikolina	Municipality of Foca - Local government water supply and sewage enterprises	Local government water supply and sewage enterprises	Local government water supply and sewage enterprises
ESS5	The Government, Municipalities – Department for administration and property affairs, Accredited experts (Individual appraisers). Assembly of Brčko District, Department for Environmental Protection and Property Affairs of the Governemnt of Brčko and Financial directorate of Brčko District.	The Government, Municipalities (Department for Property Affairs, Accredited experts (individual appraisers)	The Government, Administrations (property Departments), MoF, Appraisers.	Local Administrations (property departments), MoF, Cadaster office, Tax Administration, Administrative Courts, Appraisers.
ESS2 LABOR, WORKING CONDITIONS AND OHS	Federal Ministry of Labor and Social Policy, Federal Inspection Administration, Each Canton has its Ministry of Labor (in some of them Labor issues are merged with justice Depatments etc, some	Ministry of Labor, Veterans and disabled persons, Labor inspectorate	Ministry of Labor and social care, Labor Inspectorate	Ministry of Labor, Employment, Veteran and social issues  Labor inspectorate Local Labor inspectorates

	Cantons have their own Labor&OHS Inspection			
NGO's	Save the blue heart of Europe <sup>22</sup> Centar za životnu sredinu <sup>23</sup> Ekotim <sup>24</sup> Zeleni Neretva <sup>25</sup> Green Home Ozon Aarhus Centar Banja Luka Center for environment Banja Luka	Save the blue heart of Europe Centar za životnu sredinu Ekotim Zeleni Neretva	Save the blue heart of Europe; Green Home <sup>26</sup>	Save the blue heart of Europe

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<sup>22</sup> <https://www.balkanrivers.net/>

<sup>23</sup> <https://czzs.org/>

<sup>24</sup> <http://ekotim.net/bs/>

<sup>25</sup> [http://zeleni-neretva.ba/index.php?option=com\\_frontpage&Itemid=1](http://zeleni-neretva.ba/index.php?option=com_frontpage&Itemid=1)

<sup>26</sup> <https://www.facebook.com/green.home.18>



