

**BIH WATER AND SANITATION SERVICES  
MODERNIZATION PROJECT**

---

**STAKEHOLDER ENGAGEMENT PLAN  
FOR REPUBLIKA SRPSKA**

December 2020

---

## Table of Contents

<b>1</b>	<b>INTRODUCTION.....</b>	<b>5</b>
1.1	Context.....	5
1.2	Project description.....	5
1.3	Purpose and Objectives of this SEP.....	8
<b>2</b>	<b>REGULATIONS AND REQUIREMENTS.....</b>	<b>9</b>
2.1	National Requirements.....	9
2.2	World Bank Requirements.....	10
<b>3</b>	<b>PREVIOUS STAKEHOLDER ENGAGEMENT.....</b>	<b>12</b>
3.1	Summary of Stakeholder Engagement Done During Project Preparation.....	12
3.2	Lessons Learned on Stakeholder Engagement from Previous WSS Projects.....	12
<b>4</b>	<b>STAKEHOLDER DEFINITION AND IDENTIFICATION.....</b>	<b>14</b>
4.1	Introduction.....	14
4.2	Definition and Identification.....	14
4.3	Disadvantaged/ Vulnerable Individuals and Groups.....	16
4.4	Gender Analysis, Actions and Indicators.....	17
4.5	Citizen engagement.....	18
4.6	Stakeholder Expansion.....	19
<b>5</b>	<b>STAKEHOLDER ENGAGEMENT PROGRAM.....</b>	<b>20</b>
5.1	Principles of Stakeholder Engagement.....	20
5.2	Purpose of the Stakeholder Engagement Program.....	20
5.3	Information Disclosure.....	20
5.4	Planned Stakeholder Engagement Activities.....	22
5.5	Proposed Strategy to Incorporate the View of Vulnerable Groups.....	27
5.6	Consultations on SEP.....	27
<b>6</b>	<b>GRIEVANCE REDRESS MECHANISM.....</b>	<b>28</b>
6.1	Raising Grievances.....	28
6.2	Grievances Administration.....	29
6.3	Grievance and Beneficiary Feedback Reporting.....	29
6.4	Grievance Log.....	30
6.5	Grievance Admission Channels.....	30
6.6	Monitoring and Reporting on Grievances.....	30
6.7	World Bank Grievance Redress System.....	31
<b>7</b>	<b>IMPLEMENTATION ARRANGEMENTS AND INSTITUTIONAL ANALYSIS FOR STAKEHOLDER ENGAGEMENT.....</b>	<b>32</b>
7.1	Project Enabling Efforts from Lessons Learned.....	32
7.2	Roles and Responsibilities.....	32
<b>8</b>	<b>SEP MONITORING AND REPORTING.....</b>	<b>33</b>
8.1	Monitoring Reports during Construction.....	33
8.2	Reporting Frequency.....	34
8.3	Involvement of Stakeholders in Monitoring Activities.....	34
8.4	Reporting Back to Stakeholder Groups.....	34
<b>9</b>	<b>ESTIMATED BUDGET.....</b>	<b>35</b>
<b>10</b>	<b>ANNEXES.....</b>	<b>36</b>
	Annex A. Project Grievance Form.....	36
	Annex B. Format table for documenting stakeholder engagement.....	37

## List of Definitions for Terms Used in This Document

<b>CONSULTATION</b>	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.
<b>ENVIRONMENTAL AND SOCIAL STANDARDS</b>	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.
<b>PAP</b>	“Project Affected Person” is any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
<b>PROJECT</b>	Refers to the BiH Water and Sanitation Services Modernization Project
<b>STAKEHOLDERS</b>	Refers to individuals or groups who: (a) are affected or likely to be affected by the project ( <i>project-affected parties</i> ); and (b) may have an interest in the project ( <i>other interested parties</i> ).
<b>STAKEHOLDER ENGAGEMENT</b>	A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, and reporting to stakeholders and management functions
<b>STAKEHOLDER ENGAGEMENT PLAN</b>	A plan which assists the Borrower to effectively engage with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.
<b>VULNERABLE GROUPS</b>	People, especially those below the poverty line, the landless, the elderly, women and children, or other displaced persons who may not be protected through national land compensation legislation, who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

## Abbreviations

APCU	Agriculture Project Coordination Unit
BAM	Bosnia-Herzegovina Convertible Mark
BIH	Bosnia and Herzegovina
COVID-19	Coronavirus Disease 2019
CPF	Country Partnership Framework
CSO	Civil Society Organization
ESS	(World Bank's) Environmental and Social Standard
GDP	Gross Domestic Products
GRM	Grievance Redress Mechanism
GRC	Grievance Review Committee
LG	Local Government
MAFWM of RS	Ministry of Agriculture, Forestry and Water Management of Republika Srpska
NRW	Non-revenue water
PE	Public Enterprise
PI	Performance Indicators
PIT	Project Implementation Team
RS	Republika Srpska
SECO	State Secretariat for Economic Affairs from the Swiss Federal Government
SEP	Stakeholder Engagement Plan
SCD	Systematic Country Diagnostic
WSS	Water and Sanitation Services
WTP	Water Treatment Plant
WU	Public Water Utility
WWTP	Wastewater Treatment Plant

## 1 INTRODUCTION

### 1.1 Context

In Bosnia and Herzegovina, it is increasingly difficult to maintain drinking water supply systems, which are otherwise unable to meet the needs of all users, while the existing water protection infrastructure is in poor condition. According to the provisions of the Dayton Peace Agreement, water management is under the jurisdiction of the entities. According to the provisions of the Law on Waters of the Republika Srpska from 2006<sup>1</sup>, the Ministry of Agriculture, Forestry and Water Management of the RS is responsible for water management. Municipal water utilities and city assemblies are responsible for water supply, drainage and wastewater treatment<sup>2</sup>. The current state of water management in RS and throughout BiH is characterized by an extremely complicated and imprecise distribution of competencies, and therefore an inadequate institutional structure. Water utilities are overly dependent on the competent municipal authorities, and at the same time rely on them.

Given that the water and wastewater sector in the Republika Srpska is unsatisfactorily developed, the World Bank plans to set aside a loan in the amount of 75 million US\$ through the **BiH Water and Sanitation Services Modernization Project („the Project“)**, with the purpose of modernizing water and sanitation services in the BiH, including the entity of the RS. The Project will create an incentive framework encouraging the gradual improvement of the WSS service sector in RS toward operational and financial sustainability, good practices, and eventually, creditworthiness. The proposed Project directly responds to the priorities identified in the Country Partnership Framework (CPF) FY16-FY20 agreed upon between the World Bank and the Governments in BiH. One of the CPF's main pillars is improving public service delivery (Objective 1C), which is identified as inefficient and often financially unsustainable. The Project will contribute to more resilient, inclusive and sustainable recovery in BiH as outlined in the World Bank Group COVID-19 Response Approach Paper. The Project will build upon the existing engagement of other development partners.

### 1.2 Project description

#### 1.2.1.1 Project Objectives

The overall Project objective is improving BiH's sustainability and efficiency of WSS service delivery, and as a consequence, improves water security and resilience to expected climate change-induced shocks.

The Project development objective is to support the government of Bosnia and Herzegovina to:

- strengthen the institutional capacity at Entity and Local level for improved WSS service delivery
- improve access to safely managed WSS services
- improve the efficiency of WSS service providers in participating local governments.

#### 1.2.1.2 Project components

The project consists of three main components that correspond to the reform provisions defined in the Joint Vision for the reform sector needed to advance the water supply and wastewater management services reform in BiH for the period 2021-2028. The Project implementation will support the ongoing processes lead by the Ministry of Agriculture, Forestry and Water Management of the RS for establishing a unified framework for tariff setting and regulatory functions. Project contributes to the platform through which financing and technical assistance from other IFIs and bilateral partners has been leveraged and strategically aligned in the

---

<sup>1</sup><http://www.aarhus.ba/~aarhus/images/docs/rs/09%20Zakon%20o%20vodama%2050-06.pdf> ("Official Gazette of Republika Srpska", no. 50/06)

<sup>2</sup>[file:///C:/Users/pc/Downloads/V.6. Sektorski\\_prioriteti\\_Vodoprivreda.pdf](file:///C:/Users/pc/Downloads/V.6. Sektorski_prioriteti_Vodoprivreda.pdf)

Joint Government-Donor Vision for sector reform. The components and their description with main activities are given in the Table 1 below:

*Table 1: Project Components and Activities*

Component	Sub-component	Component description	Activities
Component 1: Improving the institutional capacity for sector modernization	Sub-component 1.1: Support for water supply and sewerage sector reforms on Entity level	<ul style="list-style-type: none"> <li>Financing a portion of the needed reform process targeting priority areas of reform.</li> <li>Institutional strengthening in coordination and aligning it with other development partners.</li> </ul>	<ul style="list-style-type: none"> <li>Development of a sector financing mechanism promoting performance-based financing</li> <li>Support the utilization of benchmarking system and expand WSS data base to include rural service providers</li> <li>Support for the establishing of a national service provider capacity building program</li> <li>Technical assistance for the formulation of regulatory and policy frameworks, policy facilitation, public consultations</li> </ul>
	Sub-component 1.2: Project management and coordination of the sector reforms	<ul style="list-style-type: none"> <li>Financing the Agriculture Project Coordination Units (APCU) in order to perform project management-related activities.</li> <li>Providing financial and technical support to line ministries and established Entity Working Groups</li> </ul>	<ul style="list-style-type: none"> <li>Technical support for coordination of sector reform process and international best practice advice for the development of legal and regulatory documents</li> </ul>
Component 2: Support for water services sector reforms at local level		<ul style="list-style-type: none"> <li>Strengthening the municipal WSS service delivery framework.</li> <li>Capacity building activities at the municipal level, in close coordination with RS levels</li> </ul>	<ul style="list-style-type: none"> <li>Preparation of water utility business plans</li> <li>Development and signing of Public Service Agreements</li> <li>Preparation of tariff proposals, based on legislation set on Entity level</li> <li>Support for organizational restructuring</li> <li>Capacity building on technical, commercial and financial topics</li> </ul>
Component 3: Improving access to safely managed WSS services and the efficiency of WSS service providers		<ul style="list-style-type: none"> <li>Financing the investments according to the water utilities' performance level classification.</li> <li>Selection of a small set of relevant key performance indicators</li> </ul>	<ul style="list-style-type: none"> <li>Performance and efficiency improvements including but not limited to the implementation of non-revenue water reduction, energy efficiency programs and improvements in metering and commercial systems</li> <li>Construct, upgrade and modernize WSS infrastructure, including water treatment and distribution facilities and wastewater collection and treatment facilities</li> </ul>

Six front-runner Water Utilities (WUs) have been identified in Republika Srpska and considered eligible for financing under Component 3 and ready for implementation during the first year of the project. Table 2 provides an overview of activities to be supported during the first year of the project implementation, and gives a brief description of the state of municipalities.

*Table 2: Project activities in municipalities/cities*

Municipality/ City and WU	Activity	Amount M EUR	Description of Municipalities/Cities
Doboj – WU "Vodovod" Doboj	1. Construction of water wells at the new location; 2. Construction of a new storm water collector; 3. Reconstruction of water network in the city.	1.7	City of Doboj is situated on the banks of Bosna river, in the northern region of the RS. It covers the area of 653 km <sup>2</sup> and has 69,343 inhabitants <sup>3</sup> . In May 2014, Doboj was the city in BiH that accounted for the most damage and casualties during and following the historic rainfall that caused massive flooding and landslides.
Istočno Sarajevo – WU "Vodovod i kanalizacija" Istočno	1. Reconstruction and expansion of an existing Water Treatment Plant.	2.3	City of Istočno Sarajevo is one of the largest administrative areas in RS, consisting of 1450 km <sup>2</sup> area. The Željeznica river is one of the city's main hydrological features. The city of Istočno Sarajevo has a population of 61,516 inhabitants and it is one of the most important industrial centers in BiH <sup>4</sup> .

<sup>3</sup> Revised Development Strategy of the City of Doboj for the period from 2016-2020 (<https://doboj.gov.ba/wp-content/uploads/2020/01/Revidirana-strategija-razvoja-Grada-Doboja-za-period-od-2016.-2020..pdf>)

<sup>4</sup><https://gradistocnosarajevo.net/>

Sarajevo			
Laktaši– WU "Budućnost" Laktaši	1. Construction of transmission mains and distribution network extension in the city and rural areas (7 sub-components); 2. Construction of main sewer collector and secondary network.	2	Municipality of Laktaši is a developed business center and has a total area of 388 km <sup>2</sup> . Municipality has 34,720 inhabitants in 11 local communities, while 5,879 inhabitants live in the municipal center. In the middle of its territory flows the river Vrbas. <sup>5</sup>
Prnjavor – WU "Vodovod" Prnjavor	1. Extension of the distribution network; 2. Extension of the sewer network.	7.7	The Municipality of Prnjavor covers an area of 630 km <sup>2</sup> . In the Municipality of Prnjavor live 34,357 inhabitants, this makes up about 3% of the population of the RS <sup>6</sup> . Prnjavor is located in the basin of the Ukrina river.
Zvornik – WU "Vodovod i komunalije" Zvornik	1. Construction of main sewer collector; 2. Construction of the WWTP (28,000 PE).	8.7	The city of Zvornik covers an area of 371.95 km <sup>2</sup> and is one of the developed local self-government units in the RS. The hydrographic network consists of 12 catchment areas, and the Drina River has the most significant hydropower potential. <sup>7</sup>
Trebinje – WU for communal Hydrotechnics "Vodovod" Trebinje	1. Construction of two reservoirs and transmission mains; 2. Reconstruction of water network; 3. Extension of the wastewater collection system	3.8	The territory of the City of Trebinje covers an area of 904 km <sup>2</sup> . Trebinje is the primary regional center of the energy- agro-tourist region of Trebinje-Foča and the city has about 104,000 residents. The largest water source in the city is the catchment area of the river Trebišnjica. <sup>8</sup>

### 1.2.1.3 Project outputs and outcomes

Project implementation will improve the existing framework for the water service and sanitation system. Also, the Project will enhance the water supply and wastewater infrastructure. The main project outputs, outcomes and intermediate outcomes are given in the Table 3 below.

Table 3: Main Project results

Component	Sub-component	Outputs	Intermediate outcomes	Outcomes
Component 1: Improving the institutional capacity for sector modernization	Sub-component 1.1: Support for water supply and sewerage sector reforms on Entity level	<ul style="list-style-type: none"> <li>Sector-wide financing mechanism established</li> <li>Benchmarking system operationalized</li> <li>National capacity building program launched</li> </ul>	<ul style="list-style-type: none"> <li>Incentive-based financing mechanism institutionalized</li> <li>Performance data monitoring and reporting improved</li> <li>National capacity Building program institutionalized</li> </ul>	<ul style="list-style-type: none"> <li>Sector financing mechanism improved with performance-based allocation</li> </ul>
	Sub-component 1.2: Project management and coordination of the sector reforms	<ul style="list-style-type: none"> <li>Working groups coordinate sector reform</li> <li>New legal and regulatory instruments include international best practice recommendations</li> </ul>	<ul style="list-style-type: none"> <li>Adoption of new institutional and regulatory framework</li> </ul>	
Component 2: Support for water services sector reforms at local level		<ul style="list-style-type: none"> <li>Key-performance indicators defined and PSA and BPs prepared</li> <li>Partnership with existing regional capacity buildings programs</li> </ul>	<ul style="list-style-type: none"> <li>PSAs signed and adopted Business Plans with defined areas for improvement adopted by WUs</li> <li>WUs and LGUs staff trained</li> </ul>	<ul style="list-style-type: none"> <li>Improved quality and reliability of WSS service provision</li> </ul>
Component 3: Improving access to safely managed WSS services and the efficiency of WSS service providers		<ul style="list-style-type: none"> <li>Non-revenue reduction and energy efficiency programs launched</li> <li>Commercial systems improved</li> <li>Existing WSS infrastructure rehabilitated</li> <li>New WSS infrastructure constructed</li> </ul>	<ul style="list-style-type: none"> <li>Increased efficiency of WSS systems (decreased NRW, increased energy efficiency, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Increased access to WSS service provision</li> </ul>

<sup>5</sup> Development Strategy of the Municipality of Laktaši revised for the period 2019-2024 (<http://opstina-laktasi.com/wp-content/uploads/2019/07/Strategija-razvoja-opstine-Laktasi-revidovana-za-period-2019-2024-nacr.pdf>)  
[6https://opstinaprnjavor.net/](https://opstinaprnjavor.net/)

<sup>7</sup> Strategy of Integrated Development of the City Zvornik for period 2018-2027. (<https://gradzvornik.org/wp-content/uploads/2020/08/Strategija-integrisanog-razvoja-grada-Zvornik-za-period-2018-2027.-godine.pdf>)

<sup>8</sup> Development Strategy of the City Trebinje 2018-2027 (<https://www.investintrebinje.com/wp-content/uploads/2019/03/Strategija-razvoja-grada-Trebinja-2018-2027..pdf>)

#### 1.2.1.4 Summary of Potential Environmental and Social Impacts

This project is rated as Substantial risk due to the potential nature of the sub-projects and the significant impact on the policy and institutional environment. Investments may include construction and reconstruction of water supply and wastewater collection and treatment networks. The environmental and social impacts assessed may include construction specific impacts such as dust and noise, OHS, land use, waste management, potential finds of hazardous materials such as asbestos-cement pipes, chance finds for pipe networks, procurement, use, management and disposal of chemicals for water supply treatment, odor and noise of the wastewater treatment plants and sludge management from such facilities. The construction related impacts can be readily mitigated through application of site-specific Environmental and Social Management Plans (ESMPs) which shall be developed for each specific site once design documentation is prepared at a stage to allow for meaningful environmental due diligence, during project implementation.

#### 1.2.1.5 Project Implementation Arrangements

The WSS sector does not have a single institution at entity level with a clear mandate to monitor compliance of Local Governments (LGs) and WUs with regards to service delivery performance nor supporting the sustainability of investments. In Republika Srpska, the existing PIU (Agriculture Project Coordination Unit-APCU) within RS Ministry of Agriculture, Forestry and Water Management will implement the Project, and technical support will be provided from the Public Institution Vode Republike Srpske. Based on an assessment of the APCU, they have the capacity to implement the project but further strengthening is proposed. A Project Implementation Consultant could be hired to provide ad-hoc support when needed for the implementation of the investments.

In each municipality, in which the Project is implemented, the Project Implementation Team (PIT) shall be established which should consist of representatives from Municipality/City and Water Utility. The PIT will prepare documentation needed for tendering procedures and submit to APCU. Also, the PIT will carry out daily coordination of the activities and regularly report to APCU. APCU shall organize needed training to PIT staff in order to strength capacities on local level.

The established Republic Working Group should serve as a transitional structure. The Republic Working Group and APCU will be under the supervision of the Ministry of Agriculture, Forestry and Water Management of the RS. In this way, the existing APCU in RS will have a clear institutional role within the organization chart of the relevant institution and a clear mandate to coordinate with Republic Working Group for know-how transfer to the institution upon the end of the Project.

### 1.3 Purpose and Objectives of this SEP

The project is being prepared under the WB's Environment and Social Framework (2018) ("ESF")<sup>9</sup>. The ESF specifies the WB's commitment to sustainable development through its policies and number of Environmental and Social Standards ("ESS"). As per ESS 10 on Stakeholders Engagement and Information Disclosure, the implementing agency should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The objective of this SEP is to define a program for stakeholder engagement throughout the entire project cycle. The SEP outlines the ways in which the project team will engage with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any related activities.

---

<sup>9</sup> Available in English at: <http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>



## 2 REGULATIONS AND REQUIREMENTS

### 2.1 National Requirements

BiH acceded to the **Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters** in 2008. The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and transboundary environment. Article 2(c) of the Convention states that the Convention applies not only to government at all levels, but also to “any other natural or legal persons having public responsibilities or functions, or providing public services, in relation to the environment, under the control of a public authority.

In RS public consultations are legally required within the procedure for developing spatial planning documentation, as well as issuing of Environmental Permits and Construction Permits. Table 4 below contains legal requirements for the public participation relevant for this Project.

*Table 4: RS legal requirements for the public participation relevant for this Project*

Republika Srpska	
<i>Law on Access to Information in RS<sup>10</sup></i>	<p><b>Free Access to Information</b></p> <p>The Law establishes the general right of the public to access information that is under the control of public authorities “as far as possible in the public interest. This Law facilitates and promotes, to the greatest extent, and without delay, the publication of information under the control of a public authority, at the lowest acceptable price.</p>
<i>Law on Waters of the RS<sup>11</sup></i>	<p><b>Law on waters and information for public</b></p> <p>This Law regulates the manner of integrated water management within the territory of the Republika Srpska. Water management includes an integrated approach, namely: water protection, water use, protection against harmful effects of water, regulation of watercourses and other water bodies and the public good.</p> <p>This Law also regulates the financing of activities, administrative bodies, public services and institutions in the water sector, water facilities and plants, and other issues related to integrated water management in the Republika Srpska</p> <p>This Law ensures public participation in water-related decision-making, including public access, complete, accurate and timely information on the state of water, on activities undertaken by persons using or polluting water and on activities undertaken by competent authorities and institutions.</p>
<i>Law on Local Government of the RS<sup>12</sup></i>	<p><b>Principles of Local Government and public information</b></p> <p>This Law regulates the system of local self-government, local self-government units, manner and conditions of their formation, affairs of local self-government, bodies of local self-government units, mutual relations of the local self-government unit and the mayor, i.e. property and financing of local self-government units, acts and public work of local self-government units, the procedure of supervision over the work of local self-government units, forms of direct participation of citizens in local self-government, cooperation of local self-government units, the relationship between republic bodies and local self-government units, protection of local self-government rights and other issues exercising the rights and duties of local self-government units.</p> <p>The local self-government unit provides information and public information on issues of importance for the life and work of citizens in its area.</p> <p>The bodies of the local self-government unit ensure the publicity of work by regularly providing information to the media, by regularly holding press conferences, by regularly publishing data on the number of employees in the city or municipal administration by category of employees, by providing conditions for unhindered informing the public. changes in the organization, scope of work, schedule of working hours and other changes in the organization and work of the city or municipal administration</p>
<i>Law on Environmental Protection of the RS<sup>13</sup></i>	<p><b>Public consultations during Environmental Impact Assessment (EIA) procedure</b></p> <p>This Law regulates the protection of the environment in order to preserve it, reduce risks to human life and health, and ensure and improve the quality of life, protection of all elements of the environment, information and access to information in the field of environmental protection, planning and environmental protection,</p>

<sup>10</sup>Official Gazette of RS, No. 20/01

<sup>11</sup> Official Gazette of RS, No. 50/06

<sup>12</sup> Official Gazette of RS, No. 97/2016 and 36/2019

<sup>13</sup> Official Gazette of RS, No. 71/2012 and 79/2015

	<p>strategic assessment environmental impact assessment and assessment, the process of issuing environmental permits and preventing large-scale accidents, the eco-labeling system and environmental management, the financing of environmental activities, liability for environmental damage, as well as the rights and obligations of legal and natural persons performing activities determined by this Law.</p> <p>Each individual and organization must have adequate access to environmental information held by public authorities, including information on hazardous substances and activities in their communities, as well as the opportunity to participate in decision-making.</p>
<i>Law on Public Enterprises of the RS<sup>14</sup></i>	<p>This Law regulates the business and management of public companies in the Republika Srpska, company bodies, conflicts of interest with the company, code of ethics, internal procedures, illegal and restricted activities and other issues of importance for the work of these companies.</p> <p>Public companies are obliged to make information about their financial and organizational structure available to the public, through the company's website or in another adequate way.</p>
<i>Law on Spatial Planning and Construction of the RS<sup>15</sup></i>	<p><b>Public consultations during the issuing of construction permits</b></p> <p>This Law regulates the system of spatial planning and spatial planning, preparation, preparation and adoption of spatial planning documents, location conditions, construction land development, issuance of construction permits, types and content of technical documentation, construction of facilities and mutual relations between construction participants, use and removal of buildings, legalization of buildings, supervision over the application of this law, competence and work of the Chamber of Engineers, and other issues of importance for spatial planning, construction land and construction of buildings.</p> <p>The Government of the Republika Srpska shall issue a decree on the electronic procedure for the exchange and processing of documents and data when issuing location conditions, construction and use permits.</p> <p>The investor of the construction of the facility on the city construction land cannot be issued a construction permit until he submits proof that the determined compensation for the costs of arranging the city construction land and rent has been paid.</p>

## 2.2 World Bank Requirements

The World Bank has, in its [Environmental and Social Framework](#) (“the Framework”) which became effective in October 2018, committed to taking the path that leads to sustainable development. The Framework specifies the mandatory requirements in the form of 10 standards that borrowers must apply. The Bank has the opinion that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their objective to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. One of those 10 standards is the [Stakeholder Engagement and Information Disclosure 10 \(“ESS10”\)](#) which addresses stakeholder engagement. This standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Objectives of ESS10 are the following:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life -cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

<sup>14</sup> Official Gazette of RS, No: 01-590 / 04

<sup>15</sup> Official Gazette of RS, No. 40/2013, 2/2015

A Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP. The Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

The WB particularly emphasizes **effective, inclusive and genuine citizen engagement** through disclosure of project-related information, consultation and effective feedback. Projects must include in the design activities which engage citizens/beneficiaries. The interaction between the government and citizens must be two-way – meaning that citizens must be involved in the process of decision-making. When citizens provide inputs or feedback, the government needs to take these views into account, resolve the issues raised and respond to the citizens (i.e. provide feedback). Empowering citizens to participate in the development process and integrating citizen voice in development programs is the key to achieving positive results.

Prior to introduction of ESS10, in 2014, the World Bank Group (WBG) developed a [Strategic Framework for Mainstreaming Citizen Engagement in WBG Operations](#) to systematically mainstream citizen engagement in WBG-supported operations. *The Strategic Framework defines citizen engagement as the two-way interaction between citizens and governments or the private sector within the scope of WBG interventions.* This approach gives citizens a stake in decision-making in order to improve intermediate and final development outcomes.

In practical terms, the World Bank's citizen engagement commitment means that all Investment Project Financing (IPF) operations financed with IBRD loans or IDA credits must meet three requirements:

- Project design must be citizen-oriented, i.e., having at least one mechanism to engage with beneficiaries in the specific context of the project.
- Projects' results frameworks must include at least one beneficiary feedback indicator to monitor citizen engagement throughout project implementation. The indicator must demonstrate two-way citizen engagement ("close the feedback loop") – when citizens provide inputs or feedback, the government needs to respond or reply in some form, i.e. the government takes into account citizens' views, resolves the issues raised or publishes the response to the feedback.
- Projects must report on the beneficiary feedback indicator(s) by the third year of implementation.

Chapter 4 of this SEP defines the relationship between the two terminologies - citizens and stakeholders.

### 3 PREVIOUS STAKEHOLDER ENGAGEMENT

#### 3.1 Summary of Stakeholder Engagement Done During Project Preparation

At the end of 2019, several activities and events were organized in municipalities in RS with the aim of informing the general public and citizens about the concept of the WSS Modernization Project. In addition to informing about the Project, information on the policies and general work of the World Bank in RS was presented. Stakeholder engagement supports the development of strong, constructive, and responsive relationships that are critical for sound project design and implementation.

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

- On October 1<sup>st</sup>, 2019 concept was presented and discussed with Republika Srpska government including Ministry of Finance, Ministry of spatial planning, Construction and ecology, Ministry of governance and Self Governance and Ministry of Agriculture, Forestry and Water Management.
- WB operation was presented to the Presidency of the Association of Cities and Municipalities of Republika Srpska on October 28, 2019
- In the period 5-6 December 2019, World Bank Team organized set of consultations with several municipalities in Republika Srpska to present and discuss WSS Modernization project.

Once the engagement advances together with the Project implementation stakeholder engagement activities will be updated and concerns and issues raised reflected together with how they have been addressed and feedback to stakeholders provided.

#### 3.2 Lessons Learned on Stakeholder Engagement from Previous WSS Projects

The Bank has been engaged in a long-term cooperation with the Government and has been actively supporting the design and implementation of both the sector and broader economic reforms. The Bank's global experience in water supply and sanitation and its involvement in the water sector in BiH since 1997 has provided several useful lessons that are reflected in the design of the proposed project. Recently, the World Bank dedicated significant resources to develop a global strategy for water reform and provide client countries a set of guidelines and tools for developing a reform program tailored to a specific local context. The World Bank's Utility Turnaround Framework emphasizes the role of the governance framework and enabling environment as a core pillar for turning around and enhancing utilities' performance. As experience has shown, utilities can become trapped within vicious cycles, where inefficient practices became a norm. The project is designed to break such cycles by putting a strong focus on institutions, policies and regulations at Entity level which will create and foster an environment where the water utilities can effectively improve their services to existing customers and expand their operations service areas.

Stakeholder commitment at all levels amplifies project impact and sustained outcomes. Commitment at the highest level of government down to the citizens is essential for successful project outcomes. The government of RS has shown commitment through coordination between different levels of government and service providers, as well as with the World Bank, throughout the project preparation process. Therefore, the Project would support the coordination with other international partners to secure appropriate communication to citizens in the reform process.

The lessons from the implementation of the first phase of the MEG project are directly applicable to this project. The MEG project demonstrated that there are legally undefined or poorly defined responsibilities, when it comes to the provision of water services at local level. However, these were successfully bridged with the establishment of Public Service Agreement (PSAs), signed between the local governments and their water utility companies. Implementation of PSAs enabled WUs to start practicing the partner role with their LGs, and effectively tackle individual responsibilities and obligations therein. Good results on the ground confirm the

fact that the PSA could and should be institutionalized, scaled up and replicated throughout the country and thus provide an excellent platform for improving the public water services provision.

## 4 STAKEHOLDER DEFINITION AND IDENTIFICATION

### 4.1 Introduction

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

Categories “affected parties” and “other interested parties” can be divided into two broad groups: *i*) citizens/citizen groups (including informal community groups, civil society organizations (CSOs), and non-governmental organizations (NGOs), and *ii*) government/state actors, donors and other institutions (media, businesses); whereas “vulnerable persons/ groups” always fall under the category of citizens/ citizen groups

### 4.2 Definition and Identification

For the purposes of effective and tailored engagement, stakeholders of the proposed project are divided into three core categories as explained in Table 5 below. The list of identified stakeholders for each group is provided in Table 6.

Categorization of Project stakeholders is given in the Table 5 below.

*Table 5: Stakeholder categorization*

Stakeholder category	Definition	Broad stakeholder groups identified for the project
Affected parties	Individuals, groups or other entities who are impacted or likely to be impacted directly or indirectly (actually or potentially), positively or adversely, by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.	<ul style="list-style-type: none"> <li>• Citizens/ citizen groups: <ul style="list-style-type: none"> <li>▪ Local communities - Project Beneficiaries (affected people)</li> <li>▪ People living in the Project areas</li> <li>▪ People affected by land acquisition</li> <li>▪ Construction workers</li> <li>▪ Water Utilities workers</li> </ul> </li> <li>• Government actors (Water utilities in Selected Municipalities/Cities, Municipal and City Services for Physical Planning and Housing and Communal Affairs)</li> </ul>
Other interested parties	Individuals, groups or other entities who may have an interest in the Project. These stakeholders may not experience direct impacts from the project but 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.	<ul style="list-style-type: none"> <li>• Government actors at all levels (entity ministries of finance, water supply and infrastructure institutes, inspection authorities, etc.)</li> <li>• Citizens/ citizen groups (Civil society organizations)</li> <li>• International development partners and donors</li> </ul>
Vulnerable persons/ groups	Those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. These groups often face issues such as reduced or subsidized water connections and installment payments of debts on water bills	<ul style="list-style-type: none"> <li>• Under-represented, disadvantaged individuals or groups who may be difficult to reach, illiterate or not be within the formal economy or housing market.</li> <li>• E.g. women, older people, Roma, very poor, migrants.</li> </ul>

The list of identified stakeholders is based on these three categories and presented in the Table 6 below. It should be noted that this SEP is a “living document” which will be updated regularly throughout the project life as appropriate, including the list of identified stakeholders.

*Table 6: Identified project stakeholders*

Specific stakeholders identified		Interest in the Project
<b>Affected parties</b>		
Citizens/citizen groups	Local communities in municipalities Laktaši and Prnjavor and cities Zvornik, Doboj, level East Sarajevo and Trebinje This includes residential associations.	The impact of the Project implementation on the life and work of residents in local communities, covered by the realization of the Project.
	People living in the nearby of the Project implementation locations	Impact of the Project implementation on the population and residential buildings, which are located in the immediate vicinity of the Project locations. Individuals and household likely to observe changes from the environmental and social impacts of the project activities during their implementation stemming from civil works These PAPs are likely to be affected by disturbances caused by the Project’s heavy vehicles traffic, construction impacts, noise and vibrations, etc., but may also benefit from project-related employment opportunities.
	People affected by land acquisition	Information about loss of assets attributable to the implementation needs of the Project activities.
	Water Utilities workers	Occupational health and safety issues
Government actors	WU "Budućnost" a.d. Laktaši WU "Vodovod" a.d. Prnjavor WU "Vodovod i kanalizacija" a.d. East Sarajevo WU "Vodovod i komunalije" a.d. Zvornik WU "Vodovod" a.d Doboj WU for communal Hydrotechnics "Vodovod" Trebinje	Participation in the realization of implementation and project works. Improvement of sustainability and efficiency of WSS service delivery.
	Municipalities of Laktaši and Prnjavor and Cities of Zvornik, Doboj, East Sarajevo and Trebinje - Spatial planning and environmental protection services	Participation in the realization of the Project, informing the citizens about the Project activities. Administratively manage the land acquisition process. Lead stakeholder engagement activities at the municipal and community level during land acquisition and construction works, coordination with the APCU on the outreach activities, local focal points for GRM.
<b>Other interested parties</b>		
Government actors at all levels	Ministry of Finance of the RS	Loan oversight at RS level
	Ministry of Finance and Treasury in BiH	Borrower BiH budget financial management, inclusion of BiH guarantees, authorized persons for disbursement.
	RS APCU housed by Ministry of Agriculture, Forestry and Water Management of the RS (MAFWM RS)	Project management and implementation, oversight, monitoring and reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination, guidance and coordination of stakeholder engagement activities and procurement and financial management activities in RS, collection of stakeholder feedback through regional workshops, satisfaction surveys and bilateral meetings, management of the grievance redress mechanism at Project level, communicate grievances regularly through monitoring reports;
	Ministry of Physical Planning, Construction and Ecology of the RS	The main authority for spatial planning and construction and environmental permitting at the RS level. Experienced in construction and environmental permitting at RS level.
	Ministry of Health and Social Welfare of the RS	Proposing measures related to the implementation of the Project during the COVID-19 pandemic
	Representatives of Public Institution „Vode RS“	Provision of technical support to APCU, quality protection and rational use of available water quantities and issuance of water permitting at RS level
	World Bank	The main investor, Loan Approval, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives

Specific stakeholders identified		Interest in the Project
	Swiss State Secretariat for Economic Affairs (SECO)	Grantor, Loan implementation support
Citizens/citizen groups	Union of Municipalities and Cities	The impact of the Project implementation on local communities, covered by the realization of the Project. Project requirements and conditions that administrative services should meet in order to implement the Project.
	Association of Municipal Water Utilities (waterworks), RS Waterworks Association	Participation in the realization of the project, Provision of technical support to APCU.
	RS level media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement
	NGO in the RS	Protection of water areas, natural areas and biodiversity in the locations of the Project implementation.
	Construction workers	Occupational health and safety issues
<b>Vulnerable groups</b>		
Disadvantaged/vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project		Involved in the implementation of improvements in water supply and sewerage systems in the mentioned project locations. Participation in giving feedbacks about their issues, problem regarding the water services and sanitation conditions.

### 4.3 Disadvantaged/ Vulnerable Individuals and Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. Such groups are also more likely to be excluded from the consultation process. It also includes groups who may be difficult to reach due to communication barriers (language, illiteracy) and those who are in the informal housing market or informal economy and those who are very poor and may find it hard to pay regular tariffs.

Disadvantaged / vulnerable individuals or groups in the project area include “low-income households”; women; youth; women-headed households; elder-headed households ( $\geq$  pension age) without any other household member bringing in income; persons with limited mobility; or persons with disabilities, women in rural communities, Roma groups, individuals and habitat communities. Various types of barriers may influence the capacity of such groups to articulate their concerns and priorities about project impacts. The Roma population is categorized among the most vulnerable social groups, and Roma women, in particular, as they are less educated than Roma men. In case they have a job, which is very rare, it is usually some unregistered and lower paid job. Many Roma families have been severely affected by economic consequences of the covid-19 pandemic as they have lost their precarious jobs. Women in many rural communities wash clothes by hand in addition to other domestic chores. Even if they live in the vicinity of the water or sanitation system, some low-income families do not have a connection to such systems. Persons with disabilities in one of the sample municipalities are said to be living in very poor conditions and are often cut-off from water supply due to accumulated unpaid. Elderly citizens, men and women of 65 and older can be a good but underrated target group for citizen engagement.

For each Sub-Project a vulnerability assessment will be conducted as part of the project preparation and shall inform both the Resettlement Plan if needed and the need to adapt the engagement methods and approaches as designed in this SEP to bridge any engagement barriers stemming from vulnerability.



#### 4.4 Gender Analysis, Actions and Indicators

The Projects proposed interventions will not deliver their intended economic and social returns in full unless all members of the target populations and end-user beneficiaries, irrespective of gender, can participate in the decision-making process and access improved facilities.

The World Bank 2015 Assessment of Gender Disparities in BiH estimates that BiH foregoes 16 percent of its gross national income due to gender disparities in labor force participation. It notes that laws prohibiting gender discrimination are not enforced due to inconsistencies in the system and traditional patriarchal social norms. Women with higher education have a longer waiting period to find work than men with equivalent education.

Available statistics indicate that gender inequalities in various aspects of participation in society are still very pronounced in RS:<sup>16</sup>

- Political participation - women are poorly represented in positions of political power and decision-making. Among the deputies of the National Assembly of the Republika Srpska, women make up 21.7%; and in the RS Council of Peoples, women make up only 14.8% of delegates, but make up almost a third of ministers (31.2%);
- Gender inequalities in education - more than half of women do not have above-primary education, i.e. they do not have any qualifications, and among women the share of persons with completed secondary school and university is lower than among men;
- Gender inequalities in the labor market - inequalities are expressed through numerous dimensions: less entry into the labor market, lower chances of employment and higher chances of remaining unemployed, lower share of non-agricultural employment among employed women than among employed men and less represented entrepreneurship and self-employment.

With regard to water projects, women are an important stakeholder as most of the household activities dependent on water such as cooking, cleaning, washing is invariably the responsibility of women and they suffer disproportionately if there are breaks in water supply, if water supply is restricted or if it is not potable.

During the development of this SEP a *Gender Gap and Citizen Engagement Analysis* was prepared as a standalone document. The Analysis shows that women are overall underrepresented in the BiH water sector (only 22.6% of all workers in consulted WUs in the project area). Gender-based division of jobs is present in the consulted WUs. The range of jobs suitable for women within the utility has expanded to include engineers, but other technical jobs are reserved for men. The low representation of women in certain technical jobs is determined by the low number of women attaining an education required by the WSS sector. Of all female employees in the sample WUs utilities, 31.4% are engineers and managers. The top leading positions are occupied by men (in BiH few WUs directors are women). Gender pay gap does exist but in favor of women as on average women occupy better paid positions. The average salary in the sample WUs utilities is BAM 982.67 for man and BAM 1116.37 for women, which shows a gender gap of 13.61%. Women participate in the local decision-making mechanisms to a significant extent.

The consultation will actively involve community members, irrespective of gender, to ensure effective public participation. The Project will promote access to employment and service provision opportunities. On the objective area of supporting development of more efficient land and property markets it is noted that properties are almost invariably registered to males, making it difficult for female household members to participate in the benefit sharing and decision making related to displacement. The project Development Indicators (PDIs) include total number of people benefitting from improved WSS services as a result of the project, number of WUs staff participating in capacity building programs disaggregated by gender.

<sup>16</sup><https://www.secons.net/files/publications/95-publication.pdf>

## 4.5 Citizen engagement

As reported in the *Gender Gap and Citizen Engagement Analysis* developed for this Project, both stakeholders and the WSS utility representatives report a high level of mutual communication on the issues of customers' immediate concern (such as water bills, disconnections, leaks). The channels of communication are primarily in-person contacts on the utility premises, then via telephone, and also electronically via email and Viber. The citizens' perception is that a two-way communication with their WSS utility exists, although they think that the utility could take into consideration more of their suggestions. An important issue is that citizens generally do not know enough about the problems that affect the sector, from the persistent lack of resources for operation and maintenance to low tariffs that do not cover costs and the subsequent regular budget transfers to mitigate losses from the utilities.

Grievance redress mechanisms (GRMs) exist in surveyed WSS utilities but not all are sufficiently robust. They are formal accountability mechanisms for citizens to give feedback on public services when problems arise. Feedback and complaints by individuals are allowed and can be made by email, by phone and in person. The most efficient procedure is perceived to be through direct contact, visiting the utility. Feedback is also collected in a survey and the utilities report to aggregate it and use for improving the services.

Consultative meetings have a potential of creating long-term policy dialogue between citizens and WSS utility. They can be facilitated by the LCs or CSOs. These meetings should be regular, at least four times a year, and well structured, resulting in an action plan that will be result-oriented and will identify actors responsible for their implementation. In addition, focus groups and community score cards can be introduced for gathering feedback from service users and improve communication between communities and service providers. Women participate in the local decision-making mechanisms to a significant extent. As reported in the Analysis, citizens' consultation meetings should be gender balanced and women should be explicitly invited to participate in policy dialogue. The WUs utilities can ensure that women's organizations and other organizations, such as youth and pensioners, are reached for dissemination of invitations and ensuring wide citizens' representations. Alternatively, smaller and more focused consultation events can be held in order to encourage women's participation, particularly of women from vulnerable groups, where they can feel freer to speak.

Improved citizen engagement (CE) in water sector management through raising and promotion of the water service sector at all levels in BiH will be key for the project's success. The CE strategy would support emerging reform champions at the local and Republic level by providing them with information on the problems that affect the sector (e.g. resources, cost-recovery etc.), and seek feedback from citizens, as well as communications tools, messages and dissemination of good practices. Civil society would be mobilized to monitor the performance of utilities and constructively demand improvements in service delivery. The Project will explore the possibility of setting up community-level user groups who provide oversight to the running of services, or the setting up of participatory mechanisms whereby citizens evaluate the performance of the utility, such as regular customer satisfaction surveys, citizen report cards, or social audits. Such feedback could be incorporated as part of the benchmarking reports to be produced by each utility. Measures to ensure that women as well as men have a voice in community engagement will be incorporated. An early step could be to activate public conversation about the challenges in the sector and the possible avenues to address them (i.e. which is already happening through regular meetings with other development partners and participation in different platforms such as platform for dialogue, national water conferences and others). At the level of municipalities and water utilities, citizen engagement, measures would include improved customer feedback systems, formalizing customer representation in utility oversight, as well as social mobilization and communication campaigns to address tariff increases and create willingness to pay for centralized services. An appropriate CE indicator will be identified and further discussed with the client before appraisal.

## 4.6 Stakeholder Expansion

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

Table 7: Expansion and update questionnaire

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

## 5 STAKEHOLDER ENGAGEMENT PROGRAM

### 5.1 Principles of Stakeholder Engagement

In order to meet best practice approaches, the project will apply the following principles of stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communication and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups.

### 5.2 Purpose of the Stakeholder Engagement Program

This SEP is designed to establish an effective platform for productive interaction with the affected parties and other interested parties in the implementation outcome of the project. Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities to:

- Ensure meaningful citizen engagement
- Solicit feedback to inform project design, implementation, monitoring, and evaluation,
- Clarify project objectives, scope and manage expectation,
- Assess and mitigate project risks,
- Enhance project out come and benefits,
- Disseminate project information and materials,
- Address project grievances.

### 5.3 Information Disclosure

Table 8 briefly describes what kind of information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to target the wide range of stakeholder groups. (Note: Only online/ digital method will be followed till COVID-19 situation improves)

[Annex B. Format table for documenting stakeholder engagement](#) provides a template for documenting stakeholder engagement activities.

Table 8: Description of Information Disclosure Methods

Disclosure channel	Information/documents to be disclosed	Target stakeholders	Frequency	Responsibilities
Websites of, Ministry of Agriculture, Forestry and Water Management of the RS and Municipalities/Cities as well as WUs included in the Project (dedicated section on the project)	<ul style="list-style-type: none"> <li>Project documents (including this SEP) and reports</li> <li>Regular updates on Project development</li> <li>Quarterly reports on project progress</li> <li>Details about the Grievance Redress Mechanism together with an electronic grievance submission form</li> <li>Contact details of the APCU in RS and PITs in Municipalities/Cities included in the Project</li> <li>Leaflet containing information on project grievance redress mechanism (GRM)</li> <li>Results of user-satisfaction surveys</li> <li>Summaries of stakeholder engagement activities (Annex B format)</li> </ul>	All stakeholders	Quarterly, except for the aggregate results of user-satisfaction surveys (annually) and summaries of stakeholder engagement activities (semi-annually)	APCU- MAFWM PITs - Project covered Municipalities/Cities and WUs
Media, including traditional and social media - dedicated project Facebook, Twitter pages)	<ul style="list-style-type: none"> <li>Project announcements and engagement activities</li> <li>Invitations to public consultations</li> <li>Information on planned meetings or the availability of project information</li> <li>Brief reports on project progress</li> </ul>	All stakeholders	Regularly in line with project dynamics	APCU- MAFWM PITs - Project covered Municipalities/Cities and WUs
Email	<ul style="list-style-type: none"> <li>Invitations to consultation meetings</li> <li>Project documents</li> </ul>	Government actors; water agencies, local communities, CSOs	As needed	APCU- MAFWM PITs - Project covered Municipalities/Cities and WUs
Municipalities /Cities and WUs bulletin boards and/or internal IT network	<ul style="list-style-type: none"> <li>Leaflet containing information on project GRM</li> </ul>	WUs workers, people living in Project affected area	Start of project activities	APCU- MAFWM; PITs - Project covered Municipalities/Cities and WUs
On-site meetings, trainings and written instructions	<ul style="list-style-type: none"> <li>Project GRM, OHS measures, risks during construction works, waste and hazardous materials management precautions, PPE, etc.</li> </ul>	Workers hired during construction phase, WUs workers engaged in project implementation activities, Local communities	Prior to start of construction, upgrade and modernization of WSS infrastructure and continuously as needed	APCU- MAFWM, PITs - Project covered Municipalities/Cities and WUs, Association of Municipalities and Utilities (waterworks), RS Waterworks Association

## 5.4 Planned Stakeholder Engagement Activities

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the three main project stages:

1. Project preparation (including project design, procurement of contractors and supplies) ;
2. Construction;
3. Post-construction and Operation phase.

To ensure adequate representation and participation of the different stakeholders, the project will rely on different method and techniques. The strategy for stakeholder engagement takes into consideration the limitation posed by the current COVID-19 pandemic and relies more extensively on online and distant tools (TV, radio, phone, websites) to accommodate the need for social distancing<sup>17</sup>. In the future, when there is no longer a need to follow epidemiologic measures, these engagement methods may be adjusted. The methods that will be used during the project implementation to consult with key stakeholder groups, considering the needs of the final beneficiaries, and in particular vulnerable groups, are described in Table 9.

---

<sup>17</sup> These have been informed by the guidance in the WB's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" (March, 2020).

Table 9: Summary of proposed strategy for consultation

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
<b>Stage 1: Project preparation (ESMF/RPF/ESMP/SEP Disclosure, project design, procurement of contractors and supplies)</b>	<b>Project Affected Parties (Citizens) and Vulnerable Groups</b> <ul style="list-style-type: none"> <li>People affected by land acquisition;</li> <li>People residing in project area;</li> <li>Vulnerable households</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition process;</li> <li>Assistance in gathering official documents for early land registration;</li> <li>Compensation rates and methodology;</li> <li>Project documents disclosure;</li> <li>Project scope and rationale;</li> <li>Project E&amp;S principles;</li> <li>Resettlement and livelihood restoration options;</li> <li>Grievance redress mechanism process.</li> </ul>	<ul style="list-style-type: none"> <li>Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities);</li> <li>Face-to-face meetings;</li> <li>Citizens consultation meetings;</li> <li>Mass/Social Media Communication - Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, leaflets, website;</li> <li>Information boards in the premises of the LCs, Municipalities/Cities and WUs;</li> <li>Grievance redress mechanism;</li> <li>PAP survey –prior to completion of resettlement;</li> <li>Community score cards.</li> </ul>	<ul style="list-style-type: none"> <li>Project launch meetings in Project affected municipalities and local communities;</li> <li>Monthly online meetings in Project affected municipalities;</li> <li>Survey of PAPs in Project affected municipalities and local communities;</li> <li>Communication through mass/social media and official municipalities web sites (as needed);</li> <li>Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).</li> </ul>	<ul style="list-style-type: none"> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs;</li> <li>Land acquisition department of Municipalities and Cities;</li> <li>RAP consultant;</li> <li>Local Grievance Redress Committees.</li> </ul>
	<b>Other Affected Parties (Government actors)</b> <ul style="list-style-type: none"> <li>Local Government Municipalities and Cities;</li> <li>WUs in selected Municipalities and Cities</li> <li>Cadastre offices</li> </ul>	<ul style="list-style-type: none"> <li>Project documents disclosure;</li> <li>Land acquisition process;</li> <li>Registration of land plots;</li> <li>Resettlement and livelihood restoration options;</li> <li>Project scope, rationale and E&amp;S principles;</li> <li>Grievance redress mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Virtual public meetings with PAPs.</li> </ul>	<p>Weekly (as needed)</p>	<ul style="list-style-type: none"> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs;</li> <li>Land acquisition department of Municipalities and Cities;</li> <li>RAP consultant.</li> </ul>
	<b>Other Interested Parties (Citizens)</b> <ul style="list-style-type: none"> <li>Press and media at the RS level;</li> <li>NGOs;</li> <li>General public, jobseekers;</li> <li>Businesses and Business organizations;</li> <li>Workers' organizations.</li> </ul> <b>(Government actors)</b> <ul style="list-style-type: none"> <li>RS Ministries</li> <li>Local Government</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition process;</li> <li>Grievance redress mechanism process;</li> <li>Project documents disclosure;</li> <li>Project scope, Project information rationale and E&amp;S principles;</li> </ul>	<ul style="list-style-type: none"> <li>Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities);</li> <li>Mass/social media communication- Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, public relations kits, website;</li> <li>Information boards in the premises of the LCs, Municipalities/Cities and WUs;</li> <li>Grievance redress mechanism;</li> <li>Project tours for media, local representatives;</li> </ul>	<ul style="list-style-type: none"> <li>Project launch meetings in Project affected municipalities and local communities;</li> <li>Monthly online meetings in Project affected municipalities;</li> <li>Communication through mass/social media and official municipalities web sites (as needed);</li> <li>Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition department of Municipalities and Cities;</li> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs.</li> </ul>

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	(Municipalities and Cities) Departments;		<ul style="list-style-type: none"> <li>Notice board for employment recruitment.</li> </ul>	(continuous).	
	<b>Other Interested Parties (Government actors)</b> <ul style="list-style-type: none"> <li>Other Government Departments from which permissions/clearances are required;</li> <li>Other project developers reliant on or in the vicinity of the Project and their financiers</li> </ul>	<ul style="list-style-type: none"> <li>Project information - scope and rationale and E&amp;S principles;</li> <li>Coordination activities;</li> <li>Land acquisition process;</li> <li>Grievance redress mechanism process.</li> </ul>	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Invitation to virtual public meetings</li> </ul>	As needed	<ul style="list-style-type: none"> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs;</li> <li>Land acquisition department of Municipalities and Cities.</li> </ul>
	<b>Other Interested Parties (Citizens)</b> <ul style="list-style-type: none"> <li>Other APCU's Staff;</li> <li>Supervision Consultants;</li> <li>Project Design and Development Engineers;</li> <li>Contractors, sub-contractors, service providers, suppliers, and their workers/labor force</li> </ul>	<ul style="list-style-type: none"> <li>Project information - scope and rationale and E&amp;S principles;</li> <li>Training on ESMF/ESMP requirements and other sub-management plans;</li> <li>Grievance redress mechanism process;</li> <li>Feedback on consultant/contractor reports..</li> </ul>	<ul style="list-style-type: none"> <li>Online trainings and workshops;</li> <li>Face-to-face meetings, only if needed;</li> <li>Invitation to virtual public meetings, virtual trainings/workshops;</li> <li>Submission of required reports.</li> </ul>	As needed	<ul style="list-style-type: none"> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs;</li> <li>Land acquisition department of Municipalities and Cities.</li> </ul>
Stage 2: Construction	<b>Project Affected Parties (Citizens) and Vulnerable Groups</b> <ul style="list-style-type: none"> <li>People affected by land acquisition;</li> <li>People residing in project area;</li> <li>Vulnerable households</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition process (land registration; compensation rates and methodology; livelihood restoration)</li> <li>Grievance redress mechanism process;</li> <li>Health and safety impacts (Construction-related safety measures);</li> <li>Employment opportunities;</li> <li>Environmental concerns;</li> <li>Gender Based Violence (GBV) awareness-raising;</li> <li>Project status.</li> </ul>	<ul style="list-style-type: none"> <li>Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities);</li> <li>Citizens consultation meetings;</li> <li>Individual outreach to PAPs;</li> <li>Mass/Social Media Communication - Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, website</li> <li>Information boards in the premises of the LCs, Municipalities/Cities and WUs;</li> <li>Notice board(s) at construction sites</li> <li>Grievance redress mechanism;</li> <li>Local monthly newsletter;</li> <li>Community score cards;</li> <li>Citizen/PAP survey - Upon completion of resettlement and/or construction.</li> </ul>	<ul style="list-style-type: none"> <li>Monthly/quarterly meetings in all affected municipalities and villages with ongoing construction;</li> <li>Communication through mass/social media (as needed);</li> <li>Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).</li> </ul>	<ul style="list-style-type: none"> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs;</li> <li>Land acquisition department of Municipalities and Cities;</li> <li>Supervision and RAP consultants;</li> <li>Contractor/sub-contractors;</li> <li>NGOs/trainers;</li> <li>Local Grievance Redress Committees.</li> </ul>
	<b>Other Affected Parties (Government actors)</b> <ul style="list-style-type: none"> <li>Local Government Municipalities and Cities;</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition process;</li> <li>Registration of land plots;</li> <li>Resettlement and livelihood restoration options;</li> </ul>	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Virtual public meetings with PAPs.</li> </ul>	Weekly (as needed)	<ul style="list-style-type: none"> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and</li> </ul>



Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	<ul style="list-style-type: none"> <li>WUs in selected Municipalities and Cities</li> <li>Cadastre offices</li> </ul>	<ul style="list-style-type: none"> <li>Project scope, rationale and E&amp;S principles;</li> <li>Grievance redress mechanism process;</li> <li>Project status.</li> </ul>			<ul style="list-style-type: none"> <li>WUs;</li> <li>Land acquisition department of Municipalities and Cities;</li> <li>Supervision and RAP consultants;</li> <li>Contractor/sub-contractors.</li> </ul>
	<p><b>Other Interested Parties (Citizens)</b></p> <ul style="list-style-type: none"> <li>Press and media at the RS level;</li> <li>NGOs;</li> <li>General public, jobseekers, tourists;</li> <li>Businesses and Business organizations;</li> <li>Workers' organizations.</li> </ul> <p><b>(Government actors)</b></p> <ul style="list-style-type: none"> <li>RS Ministries</li> <li>Local Government (Municipalities and Cities) Departments;</li> </ul>	<ul style="list-style-type: none"> <li>Project information - scope and rationale and E&amp;S principles;</li> <li>Coordination activities;</li> <li>Land acquisition process;</li> <li>Health and safety impacts;</li> <li>Employment opportunities;</li> <li>Environmental concerns;</li> <li>GBV related consultation;</li> <li>Grievance redress mechanism process.</li> </ul>	<ul style="list-style-type: none"> <li>Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities);</li> <li>Mass/Social Media Communication - Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, public relations kits, website;</li> <li>Information boards in the premises of the LCs, Municipalities/Cities and WUs;</li> <li>Grievance mechanism;</li> <li>Project tours for media, local representatives;</li> <li>Notice board(s) at construction sites.</li> </ul> <p>GBV related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, local NGOs and NGOs specifically working on GBV matter.</p>	<ul style="list-style-type: none"> <li>Monthly/quarterly meetings in all affected municipalities with ongoing construction and local communities;</li> <li>Communication through mass/social media (as needed);</li> <li>Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition department of Municipalities and Cities;</li> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs.</li> </ul>
	<p><b>Other Interested Parties (Citizens)</b></p> <ul style="list-style-type: none"> <li>Other APCU's Staff;</li> <li>Supervision Consultants;</li> <li>Contractor, sub-contractors, service providers, suppliers and their workers</li> </ul>	<ul style="list-style-type: none"> <li>Project information - scope, rationale and E&amp;S Principles;</li> <li>Training on ESMF/ESMP requirements and other sub-management plans;</li> <li>Grievance redress mechanism process;</li> <li>Feedback on consultant/contractor reports..</li> </ul>	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Trainings/workshops;</li> <li>Invitations to public/community meetings</li> <li>Submission of required reports.</li> </ul>	<ul style="list-style-type: none"> <li>As needed</li> </ul>	<ul style="list-style-type: none"> <li>APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>PITs - Project covered Municipalities/Cities and WUs;</li> <li>Land acquisition department of Municipalities and Cities;</li> <li>Supervision and RAP consultants;</li> <li>Contractor/sub-contractors;</li> </ul>

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Stage 3: Post-construction and Operation phase	<b>Project Affected Parties (Citizens) and Vulnerable Groups</b> <ul style="list-style-type: none"> <li>▪ People affected by land acquisition;</li> <li>▪ People residing in project area;</li> <li>▪ Vulnerable households</li> </ul>	<ul style="list-style-type: none"> <li>▪ Satisfaction with engagement activities and GRM;</li> <li>▪ Grievance redress mechanism process;</li> <li>▪ Community health and safety measures during operation phase;</li> <li>▪ Accessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities);</li> <li>▪ Individual outreach to PAPs;</li> <li>▪ Citizens consultation meetings;</li> <li>▪ Mass/Social Media Communication - Facebook;</li> <li>▪ Disclosure of written information - Brochures, posters, flyers, website</li> <li>▪ Information boards in the premises of the LCs, Municipalities/Cities and WUs;</li> <li>▪ Grievance redress mechanism;</li> <li>▪ Community score cards;</li> <li>▪ PAP survey - Upon completion of resettlement</li> </ul>	<ul style="list-style-type: none"> <li>▪ Meetings in affected municipalities and villages (six-monthly);</li> <li>▪ Survey of citizens/PAPs in affected villages;</li> <li>▪ Communication through mass/social media (as needed);</li> <li>▪ Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).</li> </ul>	<ul style="list-style-type: none"> <li>▪ APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>▪ PITs - Project covered Municipalities/Cities and WUs;</li> <li>▪ Land acquisition department of Municipalities and Cities.</li> </ul>
	<b>Other Interested Parties (Citizens)</b> <ul style="list-style-type: none"> <li>▪ Press and media at the RS level;</li> <li>▪ NGOs;</li> <li>▪ General public, jobseekers, tourists;</li> <li>▪ Businesses and Business organizations;</li> <li>▪ Workers' organizations.</li> </ul> <b>(Government actors)</b> <ul style="list-style-type: none"> <li>▪ RS Ministries</li> <li>▪ Local Government (Municipalities and Cities) Departments;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Grievance redress mechanism process;</li> <li>▪ Community health and safety measures during operation phase.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities);</li> <li>▪ Mass/Social Media Communication - Facebook;</li> <li>▪ Disclosure of written information - Brochures, posters, flyers, public relations kits, website;</li> <li>▪ Information boards in the premises of the LCs, Municipalities/Cities and WUs;</li> <li>▪ Grievance redress mechanism;</li> <li>▪ Project tours for media, local representatives.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Meetings in affected municipalities (six-monthly);</li> <li>▪ Communication through mass/social media (as needed);</li> <li>▪ Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).</li> </ul>	<ul style="list-style-type: none"> <li>▪ APCU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>▪ PITs - Project covered Municipalities/Cities and WUs;</li> <li>▪ Land acquisition department of Municipalities and Cities.</li> </ul>

## 5.5 Proposed Strategy to Incorporate the View of Vulnerable Groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. To the extent possible, project indicators will be tracked and disaggregated by gender and vulnerable groups. The consultation activities will be based on the principle of inclusiveness, i.e. engaging all segments of the local society, including vulnerable individuals.

Some of the strategies that will be adopted to effectively engage with vulnerable groups and individuals will be:

- communicate and partner with community-based organizations providing support to vulnerable and marginalized groups (such as the Red Cross, the Roma Information Center) to develop messaging and communication strategies to reach these groups;
- where necessary use appropriate local language or visual aids in case of low literacy, especially for women who would be a primarily target group;
- provide information to people who have specific communication needs in accessible formats, such as Braille or large print; text captioning or signed videos (including news and press conferences) for the hearing impaired, online materials for people who use assistive technology; share messages in understandable ways for people with intellectual, cognitive and psychosocial disabilities; for the Roma population, share information in Romani;
- regularly hold separate small group discussions with vulnerable groups/their representatives to consult with these groups;
- use adequate communication channels tailored to the needs of vulnerable groups (e.g. TV/radio for the elderly and rural/distanced communities).

In addition, focus groups or individual consultation meetings dedicated specifically to vulnerable groups will be conducted to gauge their views and concerns including for Roma communities, households and individual to identify any cumulative vulnerability stemming from their alienation from the society and under integration and the impacts attributable to project.

## 5.6 Consultations on SEP

The initial version of the SEP document will be published on the official websites of the Ministry of Agriculture, Forestry and Water Management of Republika Srpska, and on the official websites of the Municipalities of Laktaši and Prnjavor and the Cities of Zvornik, Doboј, East Sarajevo and Trebinje, as well as sent directly to relevant stakeholders with an invitation to provide comments virtually. The public will be informed about the consultation process through available online tools and public announcements in entity newspapers. Consultations will be organized by MAFWM using various online channels (email, ministry website, Facebook, etc.), and records of these virtual discussions will be reflected in the final draft of the SEP. [Annex B. Format table for documenting stakeholder engagement](#) template will be used for documenting these stakeholder engagement activities.

The SEP will be updated as necessary during project preparation, development and implementation.

## 6 GRIEVANCE REDRESS MECHANISM

Grievance includes complaints and suggestions on project implementation. Key objective of grievance mechanism is to ensure efficient manner to address grievances. The World Bank expects each project to establish such a mechanism in line with ESS10, at early stage of project development in order to be able to address specific issues in adequate and timely fashion.

The project will help improve the existing grievance mechanisms to ensure all grievances are recorded and monitored, with the aim to increase transparency and accountability, as well as to reduce risk of Project's adverse environmental and social impact.

A Project level grievance redress mechanism (GRM) will consist of a Central Grievance Redress Committee (CGRC) administered by the APCU and Sub-Project specific Local Grievance Redress Committees (LGRC) (collectively referred to as Grievance Redress Mechanism (GRM)) established and administered by the local Governments with representatives from the key four stakeholders: APCUs representative, Municipal representative and representative of the PAPs, NGO representative (female) working for Gender and GBV issues.

To ensure GRM access, potential beneficiaries, communities and other stakeholders may submit grievances through channels as outlined below. The GRM will provide the opportunity for continued feedback on the Sub-Projects and resolution of individual grievances during implementation. Procedures related to complaints handling will be posted on the APCU website to ensure full transparency.

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

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

The Central Grievance Redress Committee (CGRC) shall be effective immediately after appraisal of the Project, in order to manage and appropriately answer complaints during its different phases while the LGRC shall be effective upon decision on each new Sub-Project has been taken. In addition to the GRM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.).

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

APCU and the Local Governments respectively are responsible for establishing functioning GRM and informing stakeholders about the GRM role and function, the contact persons and the procedures to submit a complaint in the affected areas. Information on the GRM will be available:

- on the websites of the APCU (<https://www.vladars.net/sr-SP-Cyrl/Vlada/Ministarstva/mps/Pages/default.aspx>),
- on the notice boards and websites of LCs, Local Governments and WUs,
- through social media campaigns,
- through online platforms

### 6.1 Raising Grievances

Effective grievance administration strongly relies on a set fundamental principle designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective,

easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the GRM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined, or by mail-in boxes to be established within the selected WUs premises. The access points and details on local entry points shall be publicized and shall be part of the awareness building once further micro locations of the Sub-Projects are known. Within the RP for the Sub-Projects details on the GRM shall be provided.

## 6.2 Grievances Administration

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

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

In case of anonymous grievance, after acknowledgment of the grievance within three days from logging, the GRM will investigate the grievance and within 30 days from logging the grievance, issue the final decision that will be disclosed on the APCU website.

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

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

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

## 6.3 Grievance and Beneficiary Feedback Reporting

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

Agriculture, Forestry and Water Management in RS. The updates shall be disaggregated by gender, type of grievances /complaints and updated regularly.

#### 6.4 Grievance Log

The APCU will maintain grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

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

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

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

#### 6.5 Grievance Admission Channels

Any grievance can be brought to the attention of the GRM by filling the grievance form in hard copy or on-line, or in any other format as chosen by the grievant. The Grievance form is provided in [Annex A. Project Grievance Form](#).

Any type of grievance can be submitted by mail, fax, phone, e-mail or in person using the below access details:

<p>Attention: Jelena Đukić –Engineer within APCU, Republika Srpska Ministry of Agriculture, Forestry and Water Management  Address: Trg Republike Srpske 1, Banja Luka  Phone: +387 051/338-415  Fax: +387 051/338-865  E-mail: j.djukic@mps.vladars.net</p>
--

*Access details of each LGRC to be known at later stages and to be disseminated at later stages.*

#### 6.6 Monitoring and Reporting on Grievances

The CGRC will be responsible for:

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

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

- Status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on number of received grievances (applications, suggestions, complaints, requests, positive feedback) and number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
- Level of satisfaction by the measures (response) taken;
- Any corrective measures taken.

## 6.7 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a 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).

## 7 IMPLEMENTATION ARRANGEMENTS AND INSTITUTIONAL ANALYSIS FOR STAKEHOLDER ENGAGEMENT

### 7.1 Project Enabling Efforts from Lessons Learned

The Project recognizes that the stakeholder profile is quite diverse their expectations and orientation as well as capacity to interface with the project might be different. The project design and institutional arrangements have been drawn such as to enable mitigation of social exclusion risks and come up with types of activities and approaches to address the likely impediments arising the reform. This Project will be based on the early engagement and maintenance of dialog as a role model overall and in engagement with local communities in particular during preparation and implementation of site-specific resettlement plans.

### 7.2 Roles and Responsibilities

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

*Table10: Responsibilities of key actors/stakeholders in SEP Implementation*

STAKEHOLDER	RESPONSIBILITIES
APCU: <ul style="list-style-type: none"> <li>▪ Republika Srpska Ministry of Agriculture, Forestry and Water Management</li> </ul>	<ul style="list-style-type: none"> <li>▪ Plan, implement and monitor SEP activities;</li> <li>▪ Lead and coordinate stakeholder engagement activities;</li> <li>▪ Collect stakeholder feedback through regional workshops, satisfaction surveys and bilateral meetings,</li> <li>▪ Manage the grievance redress mechanism at Project level, communicate grievances regularly through monitoring reports;</li> <li>▪ Build capacity of implementing partners – Local Governments and GRM on Environmental and Social Framework (ESF) stakeholder engagement standard and its implications;</li> <li>▪ Manage the project GRM database and submit quarterly reports on the substance and quantity of grievances; and</li> <li>▪ Supervise/monitor Sub-Projects and engage with stakeholders.</li> </ul>
PITs - Local Governments (Municipalities/Cities and WUs)	<ul style="list-style-type: none"> <li>▪ Lead stakeholder engagement activities at the municipal and community level during land acquisition and construction works;</li> <li>▪ Coordinate with the APCU on the outreach activities;</li> <li>▪ Local focal points for GRM;</li> <li>▪ Administers the Grievance;</li> <li>▪ Discloses all documents, distributes outreach material as needed;</li> <li>▪ Facilitate the organization of regional stakeholder workshops to present project progress and collect feedback about project services;</li> <li>▪ Facilitate information requests and grievances by transfer to the APCU.</li> </ul>
Line departments in Municipalities and Cities in RS	<ul style="list-style-type: none"> <li>▪ Update spatial plans and issue permits (as required);</li> <li>▪ Respond to E&amp;S risk management requests;</li> <li>▪ Facilitate information requests and grievances by transfer to the APCU;</li> <li>▪ Discloses all documents, distributes outreach material as needed;</li> <li>▪ Administers land acquisition process.</li> </ul>
Other stakeholders	<ul style="list-style-type: none"> <li>▪ Participate in the implementation of SEP activities</li> <li>▪ Monitor/ensure project's compliance with the laws of RS</li> <li>▪ Engage with the project's stakeholders on E&amp;S issues</li> </ul>



## 8 SEP MONITORING AND REPORTING

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

### 8.1 Monitoring Reports during Construction

Monitoring reports documenting the environmental and social performance of the Project during construction will be prepared by the Social and Environmental specialists to be engaged by the APCU for the APCU and the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. Table 11 proposes a comprehensive set of indicators related to SEP performance at this stage. The achievement of indicators shall rely on information from the SEL.

Table 11: SEP Indicators to Be Documented in Progress Reports

ENGAGEMENT WITH PAPs
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number and location of formal meetings with PAPs
ENGAGEMENT WITH OTHER STAKEHOLDERS
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs)
Minutes of meetings will be annexed to the six-monthly report
Number and nature of Project documents publicly disclosed
Number and nature of updates of the Project website
Number and categories of comments received on the website
GRIEVANCE REDRESS MECHANISM
Number of grievances received, in total and at the local level, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of LGRC meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report)
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods
WORKERS GRIEVANCES
Number of grievances raised by workers, disaggregated by gender of workers and worksite
Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.
Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

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

## 8.2 Reporting Frequency

During the Project development and construction phase, the Social and Environmental Specialist will prepare monthly reports on E&S performance for the APCU and the WB which will include an update on implementation of the stakeholder engagement plan and include indicators as designed in Table 11. Monthly reports will be used to develop quarterly and annual reports reviewed. The quarterly and annual reports will be disclosed on the Project websites and made available at the level of project affected Municipalities.

## 8.3 Involvement of Stakeholders in Monitoring Activities

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

## 8.4 Reporting Back to Stakeholder Groups

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

## 9 ESTIMATED BUDGET

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

## 10 ANNEXES

### Annex A. Project Grievance Form

#### BIH WATER AND SANITATION SERVICES MODERNIZATION PROJECT

#### Project Grievance Form

Designation (entered by the Project Implementation Unit)	
First name and Surname (not obligatory) <input type="checkbox"/> I would like to lodge a complaint anonymously. <input type="checkbox"/> Please do not disclose my identity without my consent.	
Contact data  Signify the desired manner of contact (by mail, by telephone, by email).	<input type="checkbox"/> By mail: <i>Provide an address for mail delivery:</i> _____ _____ <input type="checkbox"/> By telephone: _____ <input type="checkbox"/> By email: _____
Description of event to which the complaint relates	What occurred? Where did it happen? To which person did it happen? What came out as a consequence of the problem?
Date of the event / complaint	
	<input type="checkbox"/> Event that occurred once/complaint (date _____) <input type="checkbox"/> It occurred more than once (how many times? _____) <input type="checkbox"/> Ongoing (a problem that currently exists)
What would you want to be undertaken?	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

*Please send this Form to the following address:*

**Attention**, Attention: Jelena Đukić –Engineer within APCU, Republika Srpska Ministry of Agriculture, Forestry and Water Management

Address: Trg Republike Srpske 1, Banja Luka

Phone: +387 051/338-415

Fax: +387 051/338-865

E-mail: j.djukic@mps.vladars.net

### Annex B. Format table for documenting stakeholder engagement

Date/venue:
Participants:
Stakeholder concerns:
Proposals given by stakeholder(s):
How will these proposals be taken into account in project design/ implementation?
Other notes: