

## **Environmental and Social Assessment**

Greenfield: **Category B Project** - GrCF2 W2 – Tram line Ilidza-Hrasnica

### **Stakeholder Engagement Plan (SEP)**

August 2022

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## Abbreviations and Acronyms

<b>BiH</b>	Bosnia and Herzegovina
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>E&amp;S</b>	Environmental and Social
<b>ESMS</b>	Environmental and Social Management System
<b>ESA</b>	Environmental and Social Assessment
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESDD</b>	Environmental and Social Due Diligence
<b>ESP</b>	Environmental and Social Policy
<b>FBiH</b>	Federation of Bosnia and Herzegovina
<b>FMET</b>	Federal Ministry of Environment and Tourism
<b>GBVH</b>	Gender based violence and harassment
<b>GHG</b>	Greenhouse Gas
<b>GM</b>	Grievance Mechanism
<b>GrCF2</b>	Green Cities Framework 2
<b>JICA</b>	Japan International Cooperation Agency
<b>KEAP</b>	Cantonal Environmental Action Plan
<b>NGOs</b>	Non-governmental organisations
<b>NTS</b>	Non-Technical Summary
<b>PIU</b>	Project Implementation Unit
<b>PRs</b>	Performance Requirements
<b>SEA</b>	Strategic Environmental Assessment
<b>SEP</b>	Stakeholder Engagement Plan

# 1. Introduction

## 1.1. Background

This document constitutes the Stakeholder Engagement Plan (SEP) for GrCF2 W2 – Tram line Ilidza-Hrasnica project in Bosnia and Herzegovina (BiH). As such, this document identifies relevant stakeholders and defines communication channels and plans regarding the tram line to be introduced in Sarajevo from Ilidza to Hrasnica.

The SEP provides an overview of national legislation, the European Bank for Reconstruction and Development (EBRD) Environment and Social Policy (ESP) 2019, the EBRD Performance Requirement 10: Information Disclosure and Stakeholder Engagement, European Union (EU) directives and international best practice related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a live document, being reviewed periodically during project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders. The SEP is part of the disclosure package developed for this Project, which consists of the Non-Technical Summary (NTS) and (SEP).

Specific objectives of the SEP are detailed below.

## 1.2. Objective of the plan

This SEP is a public document, which sets out the implementing body's commitments relating to stakeholder engagement, consultation and disclosure activities in connection with the proposed:

1. Extension of two lines of tram tracks from Ilidza to Hrasnica;
2. Construction of a new tracks roundabout in Ilidza where the connection to the existing tram tracks will be made and a U-turn in Hrasnica (in total length of 12.96 kilometres);
3. Construction of 20 tram stations.

Sarajevo Canton (hereinafter "the Client") will be the responsible government agency and will appoint a Project Implementation Unit (PIU) tasked with the management and all other accompanying procedures, as stated above, for the purposes of this Project. The public will be able to access and review this SEP (in local language and English) at the Client head office<sup>1</sup> in Sarajevo the [Client's website](#)<sup>2</sup> and [Social media page](#)<sup>3</sup> as well as the municipal building of Ilidza<sup>4</sup>, Municipality of Ilidza<sup>5</sup> website and Municipality of Ilidza [Social media page](#)<sup>6</sup>.

The goal of this SEP is to set out how stakeholder engagement will be carried out for the Project and how long-term relationships with the local communities will be maintained. This SEP also aims to inform, improve and facilitate decision-making that involves Project-affected people and other interested stakeholders in an inclusive and timely manner, and to ensure that these groups are provided with sufficient opportunity to voice their opinions about the Project.

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<sup>1</sup> Sarajevo Canton, Sarajevo, Reisa Džemaludina Čauševića 1

<sup>2</sup> <https://vlada.ks.gov.ba/>

<sup>3</sup> <https://www.facebook.com/vladakantonasarajevo>

<sup>4</sup> Address: Butmirska cesta 12

<sup>5</sup> <https://www.opcinailidza.ba/>

<sup>6</sup> <https://www.facebook.com/opcina.ilidza>

The SEP briefly describes the public consultation carried out to date and defines activities that will be implemented by the Project to inform stakeholders about the nature and the potential impacts associated with implementation. It also prescribes the mechanisms alongside instruction on how to utilise them with regard to consultation of identified and potential stakeholders, as well as channels for stakeholders via which they can provide their input and/or feedback.

The SEP contains a stakeholder identification table where relevant stakeholders are identified with the most appropriate communication channels and strategies, information disclosure requirements and grievance processes that will be adopted. If there are stakeholders who are not included in the SEP they can get in contact via contact information provided in 5.3. Stakeholder Engagement Programme to receive information about the Project and be added to the stakeholder engagement programme in this SEP.

Specific objectives of the SEP are detailed below:

1. Define the Project area/area of influence;
2. Identify, map and assess affected parties and other interested stakeholders, and how they may be affected by or interested in the Project;
3. Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
4. Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
5. Ensure stakeholders have access to information on Project activities in a timely manner;
6. Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
7. Ensure that any vulnerable groups are identified and consulted;
8. Establish clear mechanisms for answering stakeholders' questions, concerns and grievances; and
9. Document formal consultation and information disclosure activities, define stakeholder tracking and records management system.

### **1.3. Scope of Plan**

This SEP covers the Client's operations on Project, including contractor activities. The Plan is constituted of the following sections:

1. Chapter 2 – Project Background
2. Chapter 3 – Consultation and Disclosure
3. Chapter 4 – Stakeholder Identification
4. Chapter 5 – Stakeholder Engagement Programme (SEP)
5. Chapter 6 – Reporting and Grievance Mechanism (GM)

## **2. Project Description**

### **2.1. Overview of the Project**

The project includes the extension of two lines of tram tracks from Ilidza to Hrasnica, with the construction of a new roundabout in Ilidza where the connection to the existing tram tracks will be made and a U-turn in Hrasnica, where the total length of the new tracks is estimated to be 12.96 km, and construction of 20 tram stations. It is envisaged that the project will provide efficient public transport in the implementation area.

The main aim of the Project is to improve the level of service for existing and future public transport users on the given Ilidza-Hrasnica corridor by increasing the availability of public transport capacity and shortening travel time and improving the quality of life in urban areas by reducing negative impacts on the natural and social environment. As part of the GrCF2, with the primary goal of achieving significant environmental improvements and to promote the Green transition quality, via development of electricity-run means of public transport, the Project also aims to significantly reduce the use of fossil-fuel-run busses on the route, as well as target the modal shift from the use of private cars to use of public transport.

The PIU will consist of six members, where four are from the Ministry of transport of Sarajevo Canton, one representative as appointed from Transport service company and one outside associate. They are authorised by the Client authority to manage the day-to-day running of the Project, as well as mandated to manage the Project in line with EBRD regulations and regular reporting.

## 2.2. Project location

Project implementation in its entirety is to take place in the Canton Sarajevo. This is the largest urban area in BiH with a total population of 413.593<sup>7</sup>, situated in the central part of BiH and is constituted of 10 municipalities. The Project area is more precisely located within the territory of Municipality of Ilidza, with a population of 66,730.<sup>8</sup>

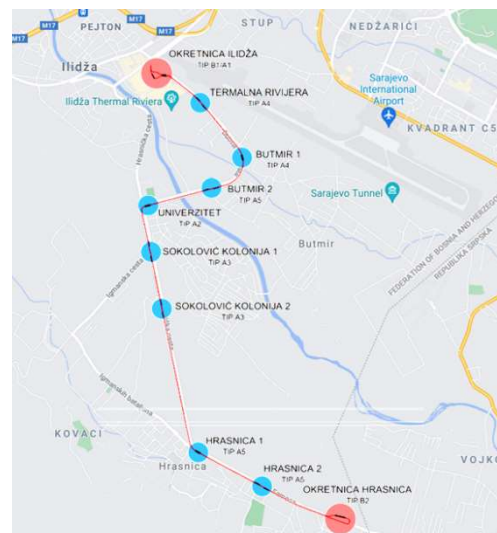


Figure 1: Layout for the Ilidza Hrasnica tram track including planned tram stops and U-turns

The locations and layout for the tram tracks, tram stations, U-turns and accompanying installations, for which the works are to be performed under this project, are given in Figure 1.

## 3. Consultation and Disclosure Legislative Framework

### 3.1. National Legislation Requirements

The level of stakeholder engagement and access to information in BiH relevant for the Client/Ministry activities on this Project is regulated by planning, construction and environmental regulation. Key BiH legislation that addresses stakeholder engagement pertaining to the Project, includes those mentioned below.

### 3.2. Legislation of BiH

Access to information in general, which is also relevant to this Project, at the national level is regulated in accordance with the Law on Freedom of Access to Information in BiH (Official Gazette of BiH, No. 28/2000, 45/06, 102/09, 62/11 and 100/13). According to the Law, every person and legal person has the right to access information. Person and legal persons are not obliged to state the reasons and prove their interest when submitting a request for access to information or during the procedure of exercising the right to access information.

<sup>7</sup> 2013 Census, <http://www.statistika.ba/>

<sup>8</sup> Idem

### 3.3. Legislation of the Federation of BiH and Canton Sarajevo

Public disclosure and consultation procedures are required under Federation of BiH (FBiH) legislation in connection to the development and adoption of spatial and zoning (urban) plans for cantons, cities and municipalities. They describe the process of issuing location and construction permits, as well as in connection to the development of project environmental impact assessments.

The most recent FBiH laws which regulate these aspects are:

1. Law on Physical Planning and Utilization of Land at the Level of the Federation BiH ("Official Gazette of FBiH", No. 2/2006, 72/2007, 32/2008, 4/2010, 13/2010, 45/2010, 85/2021 and 92/2021);
2. Law on Spatial Planning of Canton Sarajevo (Official Gazette of CS, No. 24/17);
3. Law on Environmental Protection ("Official Gazette FBiH", No. 15/21);
4. Law on Freedom of Access to Information in the Federation of Bosnia and Herzegovina ("Official Gazette of the Federation of Bosnia and Herzegovina, No. 32/2001, 48/11")<sup>9</sup>; and
5. Law on Administrative Disputes (Official Gazette of FBiH, No. 9/05).

Questions of the right of access to information that are not regulated by the FBiH Law on Environmental Protection are subject to the provisions of the Law on Freedom of Access to Information of the FBiH.

There are several disclosure and consultation activities which have been / will be undertaken for the project, they are:

1. Informing the public about the details of disclosure of Project documentation (i.e. where the hard copy is available for review, the dates and time when it can be reviewed).
2. Organising a public plan/document presentation.

The operations of all public entities, such as the Client, fall under the requirements specified in the Freedom of Access to Information in the Federation of Bosnia and Herzegovina<sup>10</sup> This law regulates citizens' rights of access to information possessed, used or controlled by public bodies, as well as the obligation of public bodies to disclose such information. The Law on Environmental Protection of FBiH<sup>11</sup> stipulates that every person and every organisation must have adequate access to information regarding the environment which is at the disposal of public authorities, including information on hazardous materials and activities in their communities, and be enabled to participate in the decision-making process.

The Law on Freedom of Access to Information, the Law on Environment Protection, the Law on Administrative Procedure and the Law on Administrative Disputes constitute the legal framework to ensure the public's right to access environmental information, which is in accordance with the principles of the Aarhus Convention and is harmonized with EU Directive 2003/4/EC on the right of access to environmental information.

Law on Expropriation of FBiH ("Official Gazette of FBiH", No. 70/2007, 36/2010, 25/2012, 8/2015 - US decision and 34/2016) is the relevant law in FBiH for land acquisition and resettlement. Regulates the

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<sup>9</sup> <http://www.pufbih.ba/v1/public/upload/zakoni/1e78c-zakon-o-slobodi-pristupa-informacijama-ispravan-tekst.pdf>: Any physical or legal subject has a right to access information under the control of a public authority, and each public authority has a corresponding obligation to communicate such information.

<sup>10</sup> Official Gazette of FBiH, No. 32/01

<sup>11</sup> Official Gazette of FBiH, No. 15/21



conditions, manner and procedure of expropriation of real estate for the construction of facilities of public interest. Based on the Law on Expropriation, the cantons make decisions on the basis of which consent is given for concluding a contract of sale in accordance with the provision of Article 23 of the Law. The Law provides only compensation for loss of assets and does not prescribe other types of assistance to displaced persons or communities. The only category of people that the Law on Expropriation guarantees compensation to is the legitimate owner of property.

In addition, of particular importance, in relation to this project, is the Law on Real Rights of FBiH ("Official Gazette of FBiH, No. 66/2013, 100/2013 and 32/2019 - US decision), where the acquisition, use, disposal, protection and termination of property rights and other real rights and possessions are regulated. Real rights are: right of ownership, right of construction, lien, land debt, right of real and personal easement and right of real encumbrance. Restrictions on real rights are that they may be revoked or limited against the owner's will only in the public interest and under the conditions provided by law in accordance with the principles of international law. Especially for the protection of natural resources, environment, human health, cultural and historical heritage, etc., it can limit or specifically regulate the use and disposal of certain items.

Provisions of the new legislation on environmental impact assessment and environmental permitting<sup>12</sup> foresee that environmental impact assessment is to be conducted for infrastructure projects as tram rails construction. Some of the basic principles which this law promotes are: public participation, access to information and decision making on issues which aim to protect the environment. Environmental impact assessment procedure is conducted in two stages with public involvement possible only in the second stage (in the form of public hearings on the EIA Study). Public Hearings must be held where the invitation to these must be given no less than 15 days before. They may be attended by all interested parties, competent authorities, organisations, NGOs and others. After the Public Hearing the documents have to be available for review for another 30 days and subject to written comments from interested parties. The application for Environmental Permit is subject to public disclosure for 30 days which is announced by the Competent Ministry in the daily newspaper and on the community, bulletin boards in municipalities. During this period, interested public can provide their comments. This is reflected in the Environmental Impact Assessment and the Environmental Permit processes.

This infrastructural object (tram rail) is not classified as a project which is in mandatory need for an environmental permit, but the Client/Ministry has submitted a preliminary environmental impact assessment for the consideration of the Federal Ministry of Environment and Tourism (FMET). Once received the FMET issues a Conclusion on the next steps within 30 days. The FMET shall provide a copy of the request and provide free access to the attached documents in order to obtain the opinion of the following entities:

- competent administrative body of the Client and the unit of local self-government in whose territory the project is carried out,
- administrative bodies and organizations responsible for the protection of environmental components,
- the interested public.

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<sup>12</sup> Regulation on projects for which environmental impact assessment is mandatory and projects for which it is decided on the need for environmental impact assessment ("Official Gazette of the Federation of BiH", No. 51/21) and Regulation determining the plants and facilities that must have an environmental permit ("Official Gazette of the Federation of BiH", No. 51/21 and 33/22)

For public disclosure the document shall be made available for public viewing on the [web site of FMET](#)<sup>13</sup>. Comments, suggestions and opinions on the Request for Preliminary Assessment can be submitted to the address of the FMET in writing within 30 days from the date of publication on the website at:

Federal Ministry of Environment and Tourism

Hamdije Čemerlića 2

71 000 Sarajevo

If based on the process as described by the Law on Environmental Protection of FBiH<sup>14</sup> it is decided that an Environmental permit/Environmental Impact Assessment is needed, then this SEP shall be updated in order to reflect further public disclosure information access and mechanisms in line with the relevant law.

In addition, according to the Law on Physical Planning and Utilization of Land at the Level of the Federation BiH, the Federal Ministry of Physical Planning has to provide public access to the Main Design and inform the public by means of a public announcement. The public is allowed 15 days for submission of comments. The Construction and Urban permits are issued for this Project, and the public consultation period has passed in accordance with local legislation.

### **3.4. EBRD Requirements**

The EBRD has set out a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (Information Disclosure and Stakeholder Engagement) of EBRD's Environmental and Social Policy (ESP) emphasises the importance of an open and transparent engagement between the project, its workers, local communities directly and indirectly affected by the project and other stakeholders as an essential element of good international practice and corporate citizenship. Stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

In accordance with PR 10, projects are required to develop and implement a SEP appropriate to the nature and scale or the risks, impacts and development stage of the project, and conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

### **3.5. EU Directives**

The first EIA Directive was adopted in 1985 (Directive 85/337/EEC) and, following the adoption of amending Directives in 1997, 2003 and 2009, a codified Directive was adopted in 2011 (Directive 2011/92/EU). Directive 2014/52/EU amends the 2011 codified Directive but does not replace it. The EIA Directive requires that public and private projects that are likely to have significant effects on the environment be made subject to an assessment prior to development consent being given.

Environmental issues in the development of plans and programs in EU regulations are regulated by Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programs on the environment. The implementation of the Strategic Environmental

<sup>13</sup> <https://www.fmoit.gov.ba/bs/okolisne-dozvole/javne-rasprave-i-javni-uvidi/javni-uvid-u-zahtjev-za-prethodnu-procjenu-uticaja-na-okolis-za-odlaganje-pokrivke-sa-pk-turija-u-pk-cubric-pomocu-tracnog-transportere-rmbu-banovici>

Assessment (SEA) is mostly regulated by the Law on Environmental Protection of FBiH<sup>15</sup> and the Law on Physical Planning and Utilization of Land at the Level of the Federation BiH<sup>16</sup> level. The Law on Environmental Protection of FBiH imposes a general obligation on public authorities to provide an environmental assessment of the possible impacts of plans and programs developed by public authorities.

### 3.6. Best International Practices

BiH also acceded to the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters in 2008 (The Aarhus Convention). 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 line with the Convention, the Client is required to:

1. Respond to requests from the public for environmental information (any member of the public can make a request, regardless of citizenship, nationality or domicile); and
2. Regularly collect and disclose environmental information to the public and notify the public that the information is available; and provide information for emergencies.

## 4. Stakeholder Identification

### 4.1. Identification of Main Stakeholders

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:

1. Primary stakeholders are the individuals and groups who are affected directly by the Project; and
2. Secondary stakeholders are those parties which have influence on, but are not necessarily directly impacted by, the Project.

The key stakeholders identified are presented in Table 1.

**Table 1: Key Identified Stakeholders and Methods of Engagement**

Stakeholder Category	Type	Name	Impact and/or Influence
Primary	Project Shareholders / Internal Stakeholders	The Client/ Ministry of Transport of Sarajevo Canton	This group will directly influence and impact the project through the decision-making process and through the appointment of the PIU.
	Project Shareholders / Internal Stakeholders	Transport service company	This stakeholder will directly influence and impact the Project, as they will be the body that will govern and operate the resulting tram infrastructure.

<sup>15</sup> Official Gazette FBiH No 15/21

<sup>16</sup> Official Gazette FBiH No 25/03)

Stakeholder Category	Type	Name	Impact and/or Influence
	Local government institution	Municipality of Ilidza	This group will directly influence and impact the project, since the Project area is completely located inside the municipality.
	Businesses and institutions	Local businesses designated for relocation	These include businesses which need to be relocated, temporarily closed or operate at a lessened capacity during and after work completion, due the construction works at the Ilidza U-turn.
	Vulnerable Groups	Veterans with disabilities	This group could be more significantly affected by this Project than others, due to the Project area including the parking lot which is governed by a veteran association.
	Businesses and institutions	Local businesses and institutions along the new tram line	It is expected that the work of these business will not be impacted in any meaningful sense by the Project, however if it is they must be taken into consideration.
	Businesses and institutions	Businesses with private owners	These are business which operate in the project area but have not been expropriated. One such business has been identified.
	Local population	Residents along project area and commuters	These are the local population who reside along the route of the tram line and other residences who are daily commuters on the road within the project area.
<b>Secondary</b>	NGOs	At this stage no specific NGOs identified.	There are many NGOs operating in Canton Sarajevo, which might influence this Project. This includes NGOs dealing with environmental preservation, biological resources, cultural and natural heritage. <sup>17</sup>
	Contractors/Suppliers	Contractors and suppliers for the Project	This group will directly participate in the implementation of the Project.
	Contractors/Suppliers	Construction workers, local individuals, based in Sarajevo.	Hired by contractors of this Project to carry out the construction works.
	Supervising Engineer	Works Supervision Consultant Engineer	Will monitor and provide guidance on the implementation of the environmental management plans of the Client and the Contractors
	Local emergency services	Fire Department, Police Department and Ambulance Services / Accident & Emergency	To be notified of possible changes to traffic conditions due to Project activities.
<b>Lender</b>	Lending Organisation	EBRD	This organisation will provide the loan to carry out the Project, alongside certain environmental, social and technical requirements.

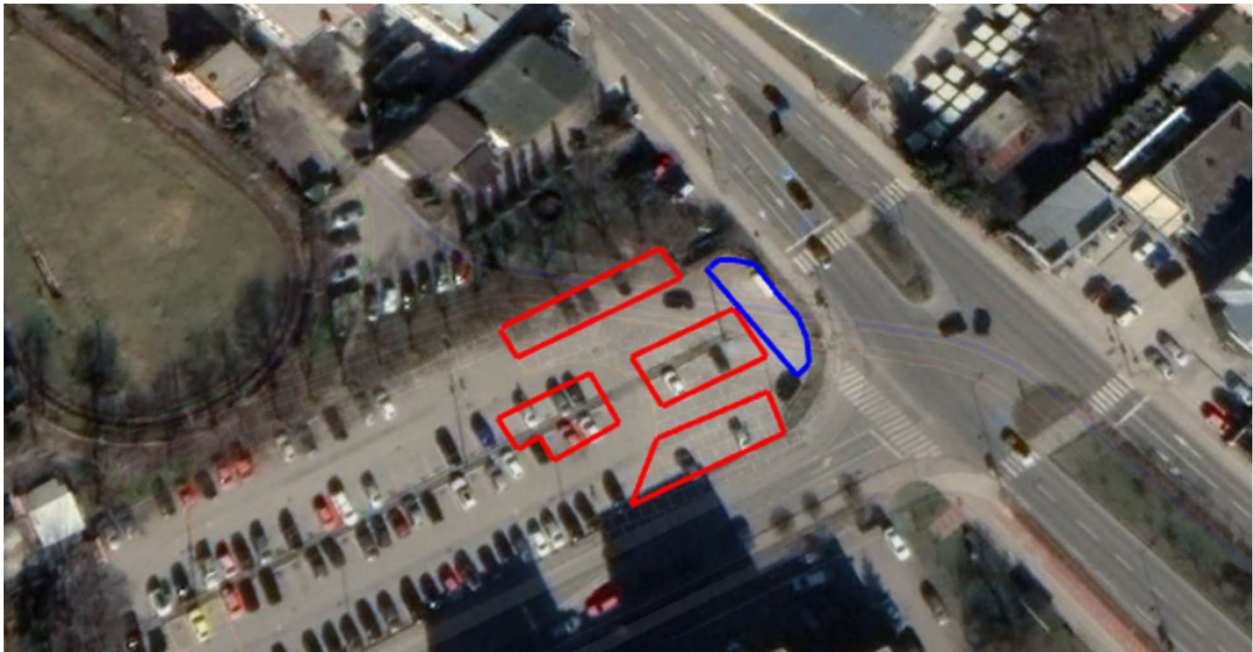
#### 4.2. Vulnerable groups

The stakeholder identification process examined if there are any groups of affected people who might be more vulnerable to current and potential Project impacts.

During the assessments and the preparation of this SEP, it was assessed whether there will be any groups who might be affected by the projects differently due to their gender, age, ethnicity, religion, physical or mental disability or other attributes.

<sup>17</sup> Registry of NGOs: [www.zbirniregistri.gov.ba/Home](http://www.zbirniregistri.gov.ba/Home)

The assessment identified that there is such one group that will be impacted by this Project. This group is veterans, where the company Izvor Bosne d.o.o., governs the parking lot, next to the Ilidza U- turn, employing four disabled veterans. The area of the parking lot is the property of the Municipality of Ilidza and is operated by the company in agreement with them. According to the main design for the Project, the parking lot would not be completely removed, instead its size would be decreased and will operate at a lesser capacity. According to the main design, as provided to the Project team, it is planned that the project area will take a total of 46 parking spaces, as shown in figure below (red colour) and a potential of 7 unmarked places (blue colour), but which are used at times when the parking lot is at maximum capacity. This will consequentially decrease the revenue generating potential of the parking lot. The aforementioned impact is addressed in detail in the Resettlement Plan document.



**Figure 2: Parking space affected by the project**

The overlay of the project area on Google Maps is given in the figure below. During Project implementation, the Client/Ministry may identify additional vulnerable groups who will then be added to the SEP and appropriate communication methods will be identified.

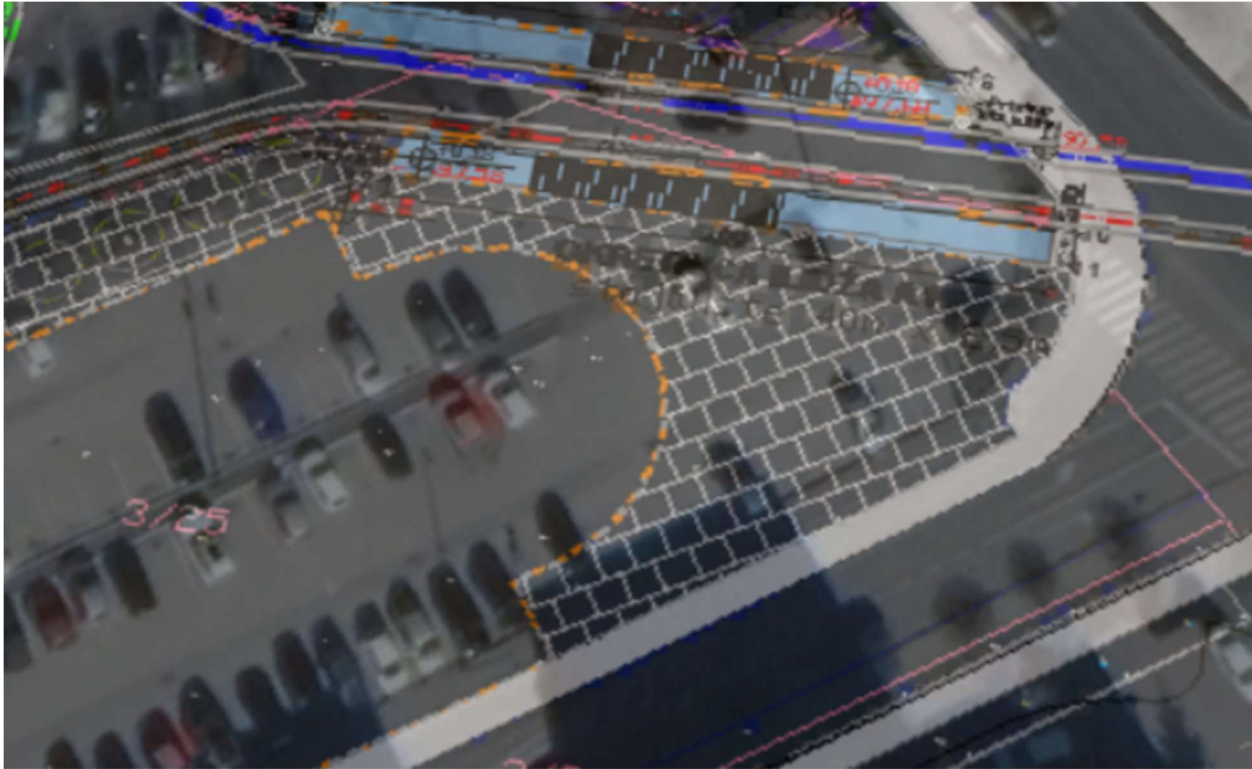


Figure 3: Overlay of the project area with tram track route

## 5. Stakeholder Engagement Programme

### 5.1. Overview of Existing Stakeholder and Community Relations

Up to this point there have been no consultation or other community related activities done by the Client/Ministry in relation to this Project besides consultations which occurred as part of the regular legal procedures.

### 5.2. Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 3 below. The objectives of external communications are to provide continuous engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the Project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, PR 10 and FBiH and Sarajevo Canton legislation. It is important to note that the ways and methods of communication with stakeholders and other participants in the project are adapted in case of resurgence of COVID-19 restrictions and measures in FBiH and Canton Sarajevo or potentially other restrictive events, as presented in Annex 3.

The SEP is a live document that will be revisited and updated, if necessary, on at least an annual basis (or when changes are made) to reflect the changes in stakeholder engagement due to project developments and new stakeholders. These changes may be brought about by management of grievances, public announcements of construction work, long term traffic changes, changes in detailed project design due to unforeseen circumstances on the field, additional information on contractors and suppliers, etc. The



information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence. The external and internal communication methods and information for disclosure identified in Table 3 are not exclusive and the Client/Ministry may choose to disclose more information upon request by stakeholders.

The Ministry is responsible for internal and external communications regarding the existing and future projects and will be the main contact point for affected people. The contact person, alongside contact information is provided in 5.3. Stakeholder Engagement Programme. All related Project documents and communication related to the Project will be available and undertaken in English and local language.

### **5.3. Stakeholder Engagement Programme**

The envisaged programme of public consultation and disclosure activities are presented below. This programme includes immediate consultation and engagement activities required to address current stakeholder concerns, as well as regular consultation and disclosure activities throughout the project life cycle.

Contact information for this project is provided below:

**PIU on behalf of the Client/Ministry**

Name: Emir Hota

Address: Reisa Džemaludina Čauševića 1

Telephone: +38761800142

Email: [emir.hota@ms.ks.gov.ba](mailto:emir.hota@ms.ks.gov.ba)

The Client/Ministry will collect any comments and feedback associated with this project and will document these. The contractor will assist in this process by escalating any grievances received through their workers, represented by a community liaison officer assigned by the contractor, to the Supervising Engineer, who will then pass on to the PIU. Minutes will be taken at all meetings (formal and informal) and will include a signed attendance register. For the purposes of this Project, it is also expected that grievances and comments may also be petitioned to the Municipality of Ilidza, which are also to be forwarded to the PIU.

All comments received will be reviewed in accordance with the commitments made under best international practise presented within section provided in Section 3. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

### **5.4. Alternative approaches with COVID-19 restrictions in places**

In case of COVID-19 restrictions being in affect during the Project cycle and affecting the ability to hold face to face public consultation meetings and individual meetings proposed in Table 2 below, a different approach will be implemented and widely communicated via social media and standard communication channels.

Table 2: Summary of Stakeholder Engagement and Disclosure Requirements

No.	Activity	Timing/further detail	Responsibility
1	Ensure that the following Project documents are publicised on the websites of the Client, Ministry of Transport of Sarajevo Canton, Municipality of Ilidza: 1. This SEP, 2. Project Main design 3. Non-technical Summary (NTS), 4. Public Grievance Form 5. Public Grievance Leaflet Print and keep hard copies of documents at premises of Ministry and Municipality	All available Project information and documents will be disclosed to the public as soon as available.	Ministry/PIU
2	Organise one public consultation meeting during Project preparation, but prior to the start of construction works (In case of COVID-19 organise online public presentation). Timely access to relevant documentation, at least two weeks in advance of meeting	Stakeholders are to be informed about the exact date, time and venue of meeting at least seven days in advance. Information to be conducted via websites <sup>18</sup> and notice boards. <sup>19</sup>	Ministry/PIU
3	Organise individual consultation meetings ( <i>In case of COVID-19 restrictions, online and telephone consultations will replace individual meetings</i> ).	As needed or requested any identified stakeholder groups/individuals	PIU
4	Organise individual consultation meeting with identified business for which the expropriation process is not complete ( <i>In case of COVID-19 restrictions, online and telephone consultations will replace individual meetings</i> ).	Stakeholders are to be informed about the exact date, time and venue of meeting at least seven days in advance. And all relevant information and documentation delivered via mail or other method if convenient.	Ministry
5	Organise individual consultation meeting to address and solve the issues of identified vulnerable groups, prior to start of works ( <i>In case of COVID-19 restrictions, online and telephone consultations will replace individual meetings</i> ).	Stakeholders are to be informed about the exact date, time, and venue of meeting at least seven days in advance. And all relevant information and documentation delivered via mail or other method if convenient.	PIU
6	Organise individual consultation meeting to address and solve the issues of potentially identified vulnerable groups ( <i>In case of COVID-19 restrictions, online and telephone consultations will replace individual meetings</i> ).	As needed or requested any identified stakeholder groups / individuals	PIU
7	Document all opinions, remarks, and possible solutions with regard to the Project raised by stakeholders during consultation meetings, and address appropriately.	Ongoing	PIU
8	Publicise information about the extent, timing and duration of planned activities, Project works, and any expected disruptions and inconveniences via the websites <sup>20</sup> and through traffic information services.	Ongoing	PIU
9	Publicise information about Project progress on websites. <sup>21</sup>	Periodically, but minimum one update per month	PIU

<sup>18</sup> Websites of Government of Client, Ministry of Transport of Sarajevo Canton, Municipality of Ilidza<sup>19</sup> Notice boards of Canton/Ministry and Municipality of Ilidza<sup>20</sup> Websites of the Client, Ministry of Transport of Sarajevo Canton, Municipality of Ilidza and transport service company<sup>21</sup> Websites of the Client, Ministry of Transport of Sarajevo Canton, Municipality of Ilidza



### **5.5. Identified Stakeholders and Specific Communication Requirements**

A list of identified stakeholders and specific communication requirements are provided in Table 3 below. The COVID-19 pandemic, which has subsided in recent month, has shown the severity of impact that such events can have on projects, especially in regard to information disclosure, including inability to meet publicly, in person and similar. In the unfortunate event of COVID-19 resurgence or events of similar magnitude please find alternative approaches to those listed in Table in Annex 3.

## Stakeholder Engagement Plan

**Table 3 Stakeholder Engagement Programme**

Identified stakeholder group	Specific issues or interests	Communication and engagement objective	Methods of communication and inclusion (without COVID-19 restrictions in place)
<ol style="list-style-type: none"> <li>1. Businesses and institutions, and Local population</li> <li>2. Residents along project area and commuters</li> <li>3. Local businesses designated for relocation</li> <li>4. Local businesses and institutions along the new tram line businesses with private owners</li> </ol>	<ol style="list-style-type: none"> <li>1. Possible inability or increased difficulty of commuting via main road in Project area</li> <li>2. Inability or difficulty for employees of local businesses to access workplace</li> <li>3. Difficulty of receiving or providing goods and services for local businesses</li> <li>4. Impacts of the project on the physical and mental health of local residents and employees of businesses inside of Project area</li> <li>5. Consultation with representatives of business undergoing economic displacement</li> <li>6. Consultation with private property owners in regards to expropriation</li> </ol>	<ol style="list-style-type: none"> <li>1. Inform stakeholders of scope and duration of Project implementation, especially in regards to construction works</li> <li>2. Address concerns in regards to specific or other possible issues raised</li> <li>3. An acceptable solution for businesses needing economic displacement</li> <li>4. An acceptable solution with privately owned businesses needing expropriation</li> <li>5. If needed further elaborate disclosure of information</li> <li>6. Any and all compensation is to be carried out in accordance with the Resettlement Plan.</li> </ol>	<ol style="list-style-type: none"> <li>1. Rules and measures related to the project will be published on the official websites and their respective social media pages (the Client <a href="#">Municipality of Ilidza</a>), as well as notice boards of the Ministry and Municipality</li> <li>2. Public meeting before commencement of construction works</li> <li>3. Organisation of individual consultation meetings on specific or other issues if requested</li> <li>4. Consultation meeting with identified business for which the expropriation process is not complete</li> <li>5. Consultation meeting with identified business which are to be economically displaced is not complete</li> </ol>
<ol style="list-style-type: none"> <li>1. Vulnerable groups</li> <li>2. Veterans with disabilities</li> </ol>	<ol style="list-style-type: none"> <li>1. Reduction of business capacity</li> <li>2. Other issues that may arise if other vulnerable groups are identified during Project implementation</li> </ol>	<ol style="list-style-type: none"> <li>1. An acceptable solution that will address the reduction in business capacity, but not endanger livelihoods of identified vulnerable group</li> <li>2. An acceptable solution for any other issues that may arise if any additional vulnerable groups are found</li> <li>3. Consultations with this group are to be carried out in line with this SEP</li> <li>4. Any and all compensation is to be carried out in accordance with the Resettlement Plan.</li> </ol>	<ol style="list-style-type: none"> <li>1. Representatives of the vulnerable groups will be contacted individually and informed about the impacts of the projects</li> <li>2. Organise consultation meeting to address and solve the issues of identified vulnerable groups, prior to start of works</li> <li>3. Organise consultation meeting to address and solve the issues of vulnerable groups during project cycle if needed</li> </ol>
<ol style="list-style-type: none"> <li>1. Local Government Institution</li> <li>2. Municipality of Ilidza</li> </ol>	<ol style="list-style-type: none"> <li>1. Involved in expropriation process</li> <li>2. Involved in complaints and suggestion process</li> <li>3. Disclosure of information</li> </ol>	<ol style="list-style-type: none"> <li>1. Completing the expropriation process</li> <li>2. Receiving and forwarding of complaints and comments</li> </ol>	<ol style="list-style-type: none"> <li>1. Monthly meetings with PIU regarding project progress</li> <li>2. Forwarding of complaints and comments to PIU</li> </ol>

## Stakeholder Engagement Plan

		3. Providing availability for disclosure of information to stakeholders as stated in SEP	3. Disclosure of public information via official website, a their respective social media pages and notice board at premises of the municipality
<ol style="list-style-type: none"> <li>1. Non-governmental organizations (NGO)</li> <li>2. NGO which deal with environmental preservation, biological resources, cultural and natural heritage</li> </ol>	<ol style="list-style-type: none"> <li>1. Stakeholders, who are interested in the protection of the environment and human health, are of high significance for the success of the Project</li> </ol>	<ol style="list-style-type: none"> <li>1. Providing timely information, communication, and consultations</li> <li>2. Protection of the environment and health of affected and vulnerable people</li> </ol>	<ol style="list-style-type: none"> <li>1. Public consultation meetings, and individual consultation meetings as necessary</li> <li>2. NGO meetings</li> <li>3. Direct email communication</li> <li>4. Local media/press releases including updates of project progress and achieved milestones on relevant social media pages</li> </ol>
<ol style="list-style-type: none"> <li>1. Contractors/Suppliers and Supervising Engineer</li> <li>2. Contractors and suppliers for the Project</li> <li>3. Construction workers, local individuals, based in Sarajevo.</li> <li>4. Works Supervision Consultant Engineer</li> </ol>	<ol style="list-style-type: none"> <li>1. The possibility of endangering the health of workers, who will participate in the implementation of the project</li> <li>2. Stakeholders, who are directly or indirectly engaged in Project planning and implementation, are of high significance for the success of the Project.</li> <li>3. Collection of complaints or comments at the construction site</li> </ol>	<ol style="list-style-type: none"> <li>1. Providing timely information about the planned Project activities</li> <li>2. Provision of Project code of conduct and work safety and health regulations, environmental protection requirements</li> <li>3. Forwarding of complaints and comments received on site</li> </ol>	<ol style="list-style-type: none"> <li>1. Information through tender procedure and contracts</li> <li>2. Ministry/PIU trough meetings to address the necessary documents related to measures to protect the health and safety of workers, as well as waste management plans</li> <li>3. Communication via supervising engineers</li> <li>4. Toolbox talks at construction sites on relevant occupational health and safety topics</li> <li>5. Weekly and monthly reports on progress of works to be submitted by contractors during construction works to PIU</li> <li>6. Monthly meetings with PIU on progress of works to be submitted by contractors during construction works</li> <li>7. Trainings as necessary</li> <li>8. Weekly report of onsite complaints and comments received</li> </ol>
<ol style="list-style-type: none"> <li>1. Local emergency services</li> <li>2. Fire Department, Police Department and Ambulance Services / Accident &amp; Emergency</li> </ol>	<ol style="list-style-type: none"> <li>1. In case of injuries to workers or certain accidents, such as fires, electric shocks.</li> <li>2. Traffic issues with regards to ability of emergency services to utilise main road in Project area</li> </ol>	<ol style="list-style-type: none"> <li>1. Meetings with PIU with representatives of all listed emergency services to agree on possible activities of emergency services</li> </ol>	<ol style="list-style-type: none"> <li>1. Public consultation meetings, and individual consultation meetings as necessary</li> </ol>

## Stakeholder Engagement Plan

		2. Providing timely information about the planned Project activities, especially traffic plans	
1. Lending Organisation 2. EBRD	1. Possibility of limited communication due to the unfavourable situation with the COVID-19 pandemic.	1. Meet all EBRD criteria, project requirements and policies	1. EBRD E&S Meetings - Reporting to EBRD representatives on project implementation progress 2. Official mails and written letters

*In summary of the table above, the key communication methods for this Project are described below:*

#### **5.6. Canton/Ministry E&S Meetings**

These meetings will provide time for the Client/Ministry to organise the implementation of environmental and social actions, as well as an opportunity for the Supervising Engineer and contractors to provide updates on their implementation of E&S actions during construction. The interaction between the Client/Ministry through the PIU and the contractors and Supervising Engineer (SE) will be stipulated in their scope of works, included in their individual contracts. This will involve regular, daily communication between all three parties.

#### **5.7. EBRD E&S Meetings**

The Client will provide quarterly and on a-needs-basis environmental, social, health and safety updates to the European Bank of Reconstruction and Development. These updates will demonstrate the implementation of environmental and social actions agreed before the loan ratification. This includes actions to be carried out by the contractors and the Supervising Engineer.

#### **5.8. Digital Media Engagement**

Public participation should also be encouraged through digital media, more precisely Facebook pages and websites of the Client/Ministry and Municipality of Ilidza. The Client/Ministry will introduce digital media material, such as posts, dedicated comment sections, upload sections and similar on the aforementioned platforms regarding the project on their website which encourages the public to actively participate by sharing their preferences, upload real-time pictures of ongoing works and submit questions/ comments. The designated E&S expert in the PIU will be responsible for monitoring and responding to reactions, comments, questions and pictures submitted, as necessary.

#### **5.9. NGO Meetings**

The Client/Ministry, through the PIU, will provide updates to all involved NGOs to demonstrate the processes implemented to ensure the protection of the environmental protection and cultural heritage, as well as vulnerable groups.

#### **5.10. Individual consultation meetings**

In addition, individual consultation meetings for specific issues, recognised in Table or otherwise, may be organised at the initiative of the identified stakeholder groups/individuals.

#### **5.11. Public consultation meeting**

The Client/Ministry will schedule and hold at least one public consultation meeting before the commencement of construction works for the purposes of this Project. The Client/Ministry, through the PIU will inform all stakeholders about the exact date, time and venue where the meeting will be held, at least 7 days in advance through the following channels:

1. The official websites<sup>22</sup> and official social media pages<sup>23</sup>
2. Local newspapers in wide circulation in premises of the Client (e.g. Dnevni Avaz and / or Oslobođenje)
3. On notice boards at the premises of the Client/Ministry and Municipality of Ilidza

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<sup>22</sup> Websites of The Client, [Ministry of Transport of Sarajevo Canton](#), [Municipality of Ilidza](#) and [Transport service company](#)

<sup>23</sup> Official facebook pages of [the Client](#), [Ministry of Transport of Sarajevo Canton](#) and [Municipality of Ilidza](#)

All available Project information and documents will be disclosed to the public at least one week in advance of the meetings. If necessary, separate meetings will be held to ensure that the stakeholder engagement is gender responsive.

At the meeting, the Client/Ministry, through the PIU, will present the project footprint, the expected impacts and planned mitigation measures, as well as receive feedback on the NTS, ESAP and SEP from locally affected stakeholders. Information on land acquisition, biodiversity assessment, plans for road safety provisions and crossing access arrangements will also be shared.

Participants will be able to present their opinions and remarks regarding the Project, as well as suggest possible solutions to the issues raised. The meetings will be open to all interested stakeholders, including residents of local communities in the vicinity of the project footprint. NGOs will receive a notification about the meetings by email/phone/post (as available) and will be invited to attend if interested.

The conclusions will be agreed during the meeting and recorded. All justified comments and proposals will be considered and appropriately addressed. The PIU will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

## **6. Reporting and Grievances mechanism**

### **6.1. Monitoring, Reporting and Feedback Mechanisms**

The Ministry, more precisely through the appointed PIU, will monitor the communication channels such as media, one-to-one meetings and periodic meetings and will provide feedback as appropriate. A complaint and suggestion box will be available for stakeholders participating in public consultation meetings and will also be available online or by contacting the Client using the details within this SEP. Any complaints and suggestions raised will be registered in the log for complaints and suggestions. These will then be sent to the PIU for the further consideration.

The results of the stakeholder engagement process will be included in Monitoring Reports to be prepared by the PIU. The first report will be produced three months after the beginning of the Project and will continue, on a quarterly basis, during construction works and on an annual basis during operation. The reports will include the following information:

1. Place and time of the held consultation meetings and other types of engagement activities, with information on the number of participants;
2. Issues and concerns raised during consultation meetings and information on how the issues raised were taken into consideration by the PIU;
3. The number and types of grievances raised in the reporting period, with indication of opened, resolved, and closed grievances and whether they have been closed out within the time frames stated in the grievance mechanism.

To monitor the implementation of this SEP and the functioning of the grievance mechanism, the Client will confirm to EBRD that the arrangements are in place and operating before construction begins. In addition, the PIU will submit Annual Environmental and Social Reports to EBRD summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism.

## 6.2. Grievance Mechanism

Any comments or concerns can be brought to the attention of the Client/Ministry verbally or in writing or by filling in a grievance form. The grievance form will be made available on official websites, at the premises of the Ministry and Municipality of Ilidza and at a suitable location near the construction site once construction has commenced, alongside a description of the grievance mechanism process.

## 6.3. Grievance Resolution

Grievances can be submitted either on site or on-line through a dedicated form. Online forms will be available at the official websites.<sup>24</sup> If forms are submitted on site, then, they can be submitted at the following locations:

1. Municipality of Ilidza – Lamija Halilović; [Lamija.Halilovic@opcinailidza.ba](mailto:Lamija.Halilovic@opcinailidza.ba), from where it will be forwarded to the PIU.
2. Ministry – Tukić Naida; 033/562-212, from where it will be forwarded to the PIU.
3. At construction site, directly to designated liaison officer, Supervising engineer or complaint box from where it will be forwarded to the PIU.

Complaints and comments can be submitted via forms (identical to the on-line forms) deposited into complaints box, which will be present at each of the above given locations and which will be checked daily. Alternatively, they can be submitted to a representative in accordance to the site where the complaint and/or comment is submitted. Forms will be available on site and online and include the following:

1. Name – or option to submit anonymously
2. Contact information – or option to submit anonymously
3. Preferred communication language
4. Description of grievance
5. Date of grievance
6. Proposed resolution

It is the responsibility of the PIU to ensure that all grievances submitted on site are logged on the on-line database. Grievances submitted on-line are logged on the database automatically.

All grievances will be:

1. Acknowledged immediately – if lodged in person;
2. Acknowledged within 3 working days if received through a letter or online;
3. Logged in the on-line database (including the name and contact details (if not anonymous), the date received, the details of the complaint, who is responsible for resolution, the actions taken, and the date resolved);
4. Responded to no later than within 30 working days; and
5. In case of anonymous complaints, the printed response will be posted at the local government (canton and municipality) information boards physically and online, so as the complaining party can approach and review the feedback.

Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

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<sup>24</sup> <https://vlada.ks.gov.ba/> (the Client), <https://ms.ks.gov.ba/> (Ministry), <https://www.opcinailidza.ba/> (Municipality of Ilidza)

#### **6.4. Roles and Responsibilities**

The Ministry, through the PIU, will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments / complaints, and responding to any such comments and complaints. Depending on the nature of a comment / complaint, some comments or complaints will be provided to the appropriate person in the company for a response.

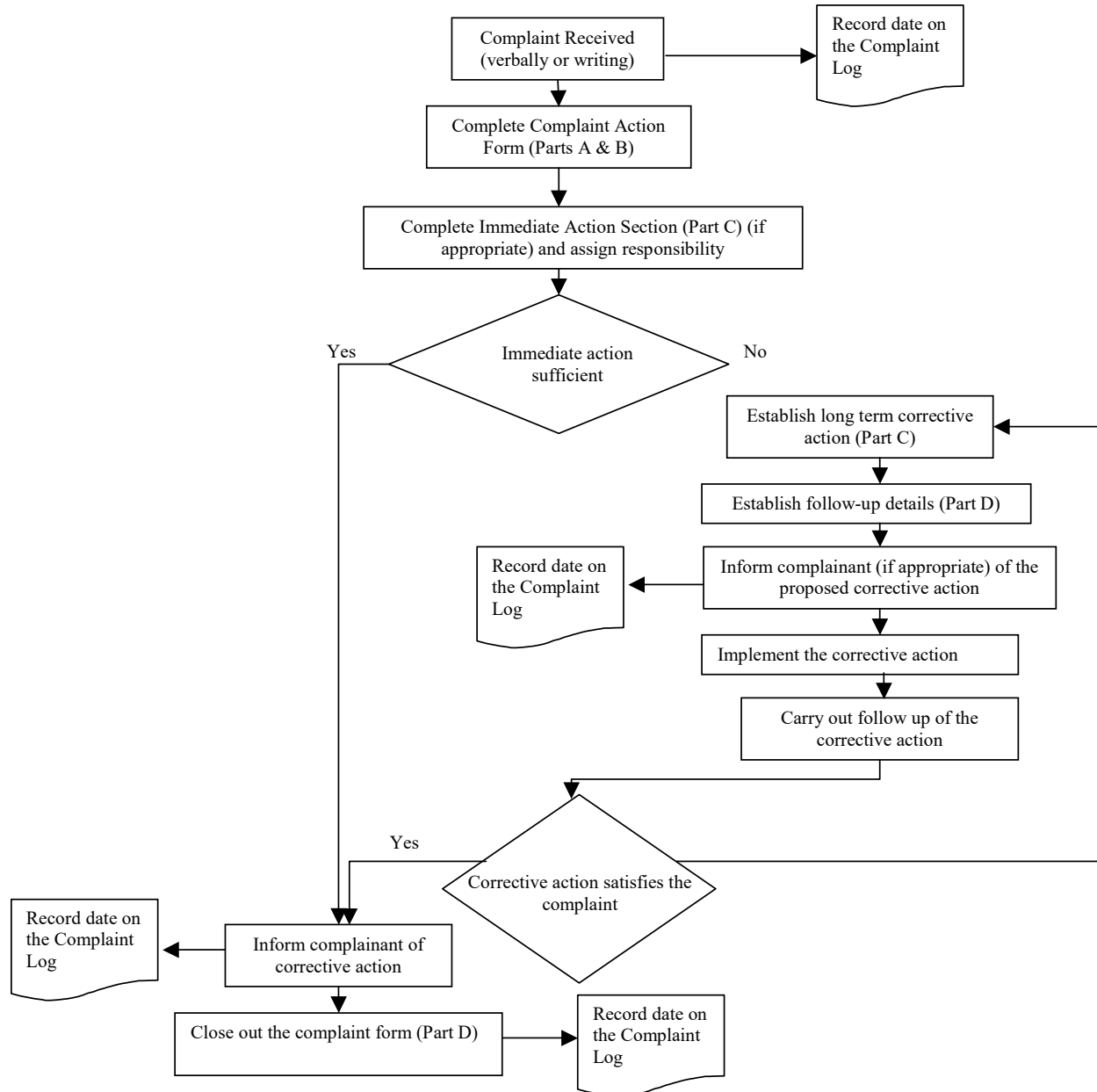
Name: Emir Hota  
Title: Assistant Minister  
Address: Reisa Džemaludina Čauševića 1  
Telephone: +38761800142  
Email: [emir.hota@ms.ks.gov.ba](mailto:emir.hota@ms.ks.gov.ba)

The SE and contractors will assist with this SEP process by elevating complaints to the PIU for their addressing. Any complaints received by the SE or contractors will be noted on site and passed on to PIU. This will be stipulated via the tender documentation and the Code of Conduct for the SE and contractors.



## 7. Appendices

### 7.1. Appendix 1 – Complaint Procedure and Grievance Form



## 7.2. Appendix 2 – Grievance log

### Public Grievance Form

Reference No:	
Full Name	
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information  Please mark how you wish to be contacted (mail, telephone, e-mail).	6. By Post: Please provide mailing address: _____ _____ 1. By Telephone: _____ 2. By E-mail: _____
Language Please mark your preferred language for communication	3. Bosnian 4. Serbian 5. Croatian 6. English 7. Other
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident/Grievance	
	8. One time incident/grievance (date _____) 9. Happened more than once (how many times? _____) 10. On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Please return this form to:

Name: Emir Hota

Title: Assistant Minister

Address: Reisa Džemaludina Čauševića 1

Telephone: +38761800142

Email: [emir.hota@ms.ks.gov.ba](mailto:emir.hota@ms.ks.gov.ba)

### 7.3. Appendix 3 – Alternative approaches of Communication Requirements for Identified Stakeholders and Specific

In the unfortunate event of COVID-19 resurgence or events of similar magnitude please find alternative specific communication requirements approaches to those listed in the table below.

Alternative approaches with COVID-19 restrictions in places		
Proposed methods (short-term))	Limitations	Proposed alternative methods (long-term)
<ol style="list-style-type: none"> <li>1. Creating and implementing online platforms for meetings, consultations and presentations including solving the issues of the project affected stakeholder group Businesses and institutions, and Local population</li> <li>2. Distribution of official emails or written letters</li> </ol>	<ol style="list-style-type: none"> <li>1. Short-term engagement may not reach all mentioned stakeholder groups</li> <li>2. During COVID-19, affected businesses and organization (owners of affected land plots) may be closed which may make it difficult for the Client/Ministry or PIU to contact them</li> </ol>	<ol style="list-style-type: none"> <li>1. Face-to-face, one-to-one meetings and discussions or online and telephone interviews and discussions</li> <li>2. Further development of online platform</li> <li>3. Engage prior to tender finalisation and prior to construction (additional mitigations can be identified)</li> </ol>
<ol style="list-style-type: none"> <li>1. Creating an online platform for solving the issues related to vulnerable groups</li> <li>2. Disclosure focusing on online methods, local radio/TV/newspaper announcement</li> <li>3. Targeted house-to-house leaflet distribution in settlements with contact details and mechanisms for returning feedback</li> <li>4. Follow-up calls if contact details are available</li> </ol>	<ol style="list-style-type: none"> <li>1. Short-term engagement may not reach vulnerable people</li> </ol>	<ol style="list-style-type: none"> <li>1. Vulnerable people identified through discussion with local authorities</li> <li>2. Face-to-face, one-to-one interviews and discussions or online and telephone interviews and discussions</li> <li>3. Engage prior to tender finalisation and prior to construction (additional mitigations can be identified)</li> </ol>
<ol style="list-style-type: none"> <li>1. Publishing information on municipal bulletin boards</li> <li>2. Official mails and written letters</li> </ol>	<ol style="list-style-type: none"> <li>1. During COVID-19, local administration and Local Communities' offices are not always open</li> </ol>	<ol style="list-style-type: none"> <li>1. Face-to-face, one-to-one interviews and discussions</li> <li>2. Online and telephone interviews and discussions</li> </ol>
<ol style="list-style-type: none"> <li>1. Disclosure through the websites of the Fund</li> <li>2. Disclosure focusing on online methods, local radio/TV/newspaper announcements</li> <li>3. Follow-up calls if contact details are available</li> </ol>	<ol style="list-style-type: none"> <li>1. Short-term engagement may not reach all interested NGOs</li> </ol>	<ol style="list-style-type: none"> <li>1. Additional interested NGOs identified through discussion with local authorities</li> <li>2. Face-to-face, one-to-one interviews and discussions</li> </ol>
<ol style="list-style-type: none"> <li>1. Official email or written letter</li> <li>2. Virtual meetings</li> <li>3. Webinars</li> </ol>	<ol style="list-style-type: none"> <li>1. Not all employees have email access</li> <li>2. Employees may be off sick</li> </ol>	<ol style="list-style-type: none"> <li>1. Telephone calls</li> <li>2. Face-to-face, one-to-one discussions</li> <li>3. Online discussions</li> </ol>
<ol style="list-style-type: none"> <li>1. Official email or written letter</li> <li>2. Follow-up calls if contact details are available</li> </ol>	<ol style="list-style-type: none"> <li>1. Certain employees may not be available due to commitments and activities regarding the COVID-19 pandemic.</li> </ol>	<ol style="list-style-type: none"> <li>1. Face-to-face, one-to-one discussions</li> </ol>
<ol style="list-style-type: none"> <li>1. Official mails and written letters</li> <li>2. Webinars</li> </ol>	<ol style="list-style-type: none"> <li>1. EBRD representatives may be unavailable due to infection with the COVID-19 virus.</li> </ol>	<ol style="list-style-type: none"> <li>1. Telephone calls</li> <li>2. Face-to-face, one-to-one discussions</li> </ol>