

STAKEHOLDER ENGAGEMENT PLAN (SEP)

**Project Title: Reconstruction and Upgrade of Road Infrastructure in the
Touristic Area of Velipoja, Shkoder – Connecting Road Buna Bridge –
Shkoder–Velipoje National Road**

Contract Ref. No.EBRD/AITP/W/2024/44

1. INTRODUCTION

This Stakeholder Engagement Plan (SEP) has been prepared for the project **“Reconstruction and Upgrade of Road Infrastructure in the Touristic Area of Velipojë, Shkodër – Connecting Road Buna Bridge – Shkodër–Velipojë National Road”**. The project is implemented by the Albanian Development Fund (ADF) within the framework of the Albanian Infrastructure and Tourism Enabling Programme (AITP). The programme is financed through a grant from the European Union and a loan from the European Bank for Reconstruction and Development (EBRD). The construction works are being carried out by the Contractor **JVCA "K.N.P.SH. Papenburg & Adriani Company Sh.p.k. & Albtiefbau Sh.p.k."**, under Contract Ref. No. **EBRD/AITP/W/2024/44**. The Contractor is responsible for the implementation of construction activities and for ensuring effective engagement with affected communities, businesses, and other stakeholders during the construction period.

This Stakeholder Engagement Plan (SEP) establishes the framework for transparent, inclusive, and continuous communication between the Contractor, ADF, local authorities, affected parties, and other interested stakeholders throughout the project lifecycle.

The SEP defines the methods and procedures for information disclosure, stakeholder consultation, management of feedback and concerns, documentation of engagement activities, and implementation of the grievance mechanism.

The purpose of this SEP is to identify project stakeholders, define communication methods, and establish procedures for consultation and grievance management in accordance with EBRD Performance Requirement 10 (PR10).

1.1 Objectives and Purposes of the Stakeholder Engagement Report

The main objectives of this Stakeholder Engagement Plan are to:

- ensure timely and transparent communication regarding project activities, construction progress, potential impacts, and mitigation measures;
- identify project stakeholders and define appropriate engagement methods according to their level of interest and potential impact;
- provide affected communities, businesses, and other stakeholders with opportunities to receive information, provide feedback, and raise concerns;
- ensure that stakeholder comments and concerns are properly recorded, evaluated, and addressed during project implementation;
- maintain effective communication with local authorities, utility providers, and other relevant institutions to facilitate coordinated implementation of works;
- ensure that vulnerable persons and persons with reduced mobility are considered during construction activities and stakeholder engagement processes;
- establish and maintain an accessible grievance mechanism for receiving, recording, and resolving complaints related to project activities;

- maintain records of stakeholder engagement activities, consultations, grievances, and corrective actions throughout the construction period.

2. PROJECT DESCRIPTION

The project takes place in the Municipality of Shkoder, a continuation of the project of the new bridge over the Buna River in the border area Albania-Montenegro. This project will connect the Bridge over the Buna River with the Shkoder-Velipoje National Road, the border crossing point and the auxiliary infrastructure.

This project targets the coastal border area that extends from the northern coastline of Albania, to the delta of the Buna/Bojana River in the Adriatic Sea. The whole area represents a great tourist potential, with well-known destinations such as Shengjini and Velipoja on the Albanian side, with unexplored but wonderful beaches such as Rana e Hedhun, Rrjoll, with lagoons, islands, hills, natural parks, rivers, etc. and Ulcinj in Montenegro with wonderful, salty beaches and cultural assets.

The existing road on which the track of the new road lies is a rural road that connects the area around the village of Pulaj with Velipoje by connecting to the Shkoder-Velipoje road. The existing road has an asphalt width of 3.5-4.0m and unpaved shoulders on both sides with variable width. On the right side, the road is bordered by the main existing drainage channel. The objects on both sides of the street have direct entrances and exits to the street. The facilities on the side of the canal have made their entrances and exits on the street by crossing the canal with small culverts and fill. At the end, the road connects with the road over the embankment along the Buna River. The existing road is located at an elevation of 0.5-1.5m above sea level. The existing road has no lighting, sidewalks and rainwater drainage system.

The new junction will lie on the existing Shkoder-Velipoje road, which has an asphalt width of 6.0m (2 lanes x 3.0m) and unpaved shoulders on both sides with a width of 1.5m. The road has a drainage channel on both sides, which is occasionally interrupted by entrances and exits. The road crosses over the main canal with a 15m span bridge in amortized condition.

The primary objective of the works is the connecting road Buna bridge-National Road Shkoder-Velipoje with the aim that all is ready for when the construction of the building of the border crossing point "Buna Bridge" together with the auxiliary infrastructure will be finalized.

The new road will ensure good tourist mobility for pedestrians and vehicles for tourist purposes, with the safest option, lasting in time, with the best cost-effectiveness ratio. In order to ensure minimum expropriation costs, the consultant has chosen to develop the road on the body of an existing road axis, in such a way as to affect as few private properties and objects as possible.

3. REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

3.1 Legislation on Access to Information

Stakeholder engagement for the **Reconstruction and Upgrade of Road Infrastructure in the Touristic Area of Velipoja, Shkoder – Connecting Road Buna Bridge – Shkoder–Velipojë National Road** shall be undertaken in accordance with the applicable legislation of the Republic of Albania governing public participation, transparency, and access to information.

The principal legal framework includes **Law No. 119/2014 "On the Right to Information"**, which establishes the public's right to obtain information held by public authorities and promotes transparency in decision-making processes. In addition, stakeholder consultation shall be conducted in accordance with relevant provisions of **Law No. 146/2014 "On Notification and Public Consultation"**, which regulates public participation in administrative decision-making, as well as applicable environmental legislation governing public consultation during environmental assessment procedures.

Where relevant, the Project shall also comply with the requirements of the **Law on Territorial Planning and Development**, the **Law on Environmental Protection**, and other applicable regulations concerning land acquisition, public infrastructure, occupational health and safety, and community protection.

Project information shall be disclosed in a timely, transparent and accessible manner, enabling affected communities, local authorities, businesses, road users and other interested parties to understand the Project, provide comments and raise concerns throughout the implementation period. Requests for information shall be managed in accordance with applicable legal requirements, while ensuring the protection of confidential and commercially sensitive information where applicable.

3.2 EBRD Requirements for Stakeholder Engagement

The Project is financed and implemented in accordance with the **European Bank for Reconstruction and Development (EBRD)** Environmental and Social Policy; therefore, a stakeholder engagement shall be carried out in accordance with **Performance Requirement 10 (PR10): Information Disclosure and Stakeholder Engagement**.

PR10 requires the Project to establish and maintain a constructive relationship with stakeholders through the timely disclosure of relevant information, meaningful consultation, and the implementation of an accessible grievance mechanism. Stakeholder engagement shall be a continuous process commencing during project planning and continuing throughout construction, operation and, where applicable, project closure.

The key objectives of stakeholder engagement are to:

- Identify all stakeholders who may be affected by or have an interest in the Project.
- Provide timely, accurate and understandable information regarding Project activities, potential impacts and mitigation measures.
- Ensure that affected communities have meaningful opportunities to express their views and concerns.
- Consider stakeholder feedback in project planning and implementation, where appropriate.
- Establish and maintain an effective Grievance Mechanism through which concerns and complaints may be submitted, recorded, investigated and resolved.
- Promote transparent communication and build trust between the Project, public authorities, local communities and other interested parties.

Special attention shall be given to potentially vulnerable or disadvantaged groups to ensure that they have equitable access to Project information and consultation opportunities. Stakeholder engagement activities shall be documented throughout the Project, including records of consultations, attendance lists, issues raised, responses provided and follow-up actions undertaken.

The Contractor, in coordination with the Employer, the Supervising Engineer and relevant public authorities, shall implement the Stakeholder Engagement Plan (SEP), regularly review its effectiveness, and update stakeholder engagement activities as Project circumstances evolve.

4. STAKEHOLDER IDENTIFICATION

4.1. Methodology

Stakeholder identification was undertaken to determine all individuals, groups, organizations and institutions that may be affected by, have an interest in, or influence the implementation of the Reconstruction and Upgrade of Road Infrastructure in the Touristic Area of Velipoja, Shkoder – Connecting Road Buna Bridge – Shkoder–Velipojë National Road.

The identification process was based on a review of the Project scope, existing site conditions, land use characteristics, environmental and social documentation, applicable regulatory requirements, and consultations with the Employer and local authorities. Stakeholders were identified considering both their potential influence on the Project and the extent to which they may be affected by construction activities.

Following identification, stakeholders were analysed and categorized according to their level of interest, influence, potential project impacts, communication needs, and preferred methods of engagement. Particular consideration was given to stakeholders directly affected by temporary traffic management measures, construction activities, access restrictions, noise, dust, and other construction-related impacts.

The stakeholder identification process is considered dynamic and shall be reviewed periodically throughout the Project lifecycle. Additional stakeholders may be identified as the Project progresses, and the Stakeholder Engagement Plan shall be updated accordingly to ensure effective communication and meaningful engagement.

4.2. Stakeholder identification and analysis

Stakeholders have been classified into three main categories:

- **Affected Parties** – individuals, groups, or organizations that may be directly affected by project activities, including residents, businesses, road users, and pedestrians within or near the project area.
- **Other Interested Parties** – institutions, organizations, and groups that may have an interest in the project due to their responsibilities, activities, or connection with the local community.
- **Vulnerable Groups** – individuals or groups who may experience difficulties in accessing project information, participating in consultation processes, or may be disproportionately affected by project activities due to their specific circumstances.

Each stakeholder group was assessed according to its potential interests, concerns, level of influence and communication needs. This analysis forms the basis for the Stakeholder Engagement Plan, ensuring that appropriate communication methods are applied, concerns are addressed in a timely manner, and meaningful engagement is maintained throughout the Project lifecycle.

The analysis of the stakeholders is provided in a table format:

Identified Stakeholder	Specific issues or interests (potential)	Communication and engagement objectives	Communication and engagement methods
Project-affected parties			
Local residents along the project corridor	Temporary access restrictions, noise, dust, vibration, traffic disruption, safety, property access	Keep residents informed of construction activities, minimize disruption, receive feedback and address concerns promptly	Public meetings, community notices, door-to-door notifications (where required), grievance mechanism, dedicated contact person, information boards
Local businesses, hotels, restaurants and tourism operators	Customer access, business continuity, delivery access, construction scheduling during the tourist season	Coordinate construction activities to minimize impacts on commercial operations and maintain access where practicable	Direct meetings, advance work notifications, coordination meetings, written notices, telephone and email communication

Road users and the general public	Traffic diversions, temporary road closures, travel delays, road safety	Inform the public of traffic management measures and promote safe road use during construction	Traffic signage, variable message signs (where applicable), social media, local media announcements, project information boards
Adjacent landowners and property owners	Access to properties, protection of adjacent assets, drainage, boundary conditions	Maintain communication regarding construction activities affecting private properties and resolve issues promptly	Site meetings, written correspondence, direct consultation, grievance mechanism
Utility service users	Temporary service interruptions due to utility relocation or protection works	Provide advance notice of planned interruptions and minimize service disruption	Public notices, coordination through utility providers, direct notifications where necessary
Other interested parties			
Albanian Road Authority (ARRSH) / The Beneficiary Institution	Contract compliance, , quality, project delivery	Reporting of project progress	Progress meetings, formal correspondence, technical assistance
Albanian Development Fund (ADF) / The Employer	Project oversight, financing, achievement of project objectives Contract compliance, programme, quality, budget, project delivery	Provide transparent reporting on project implementation, risks and key milestones Ensure effective contract administration and timely reporting of project progress	Management meetings, progress reports, presentations and formal communications
Supervision Consultant / the Engineer (JV. "P.A.C.E. / ERALD-G")	Construction supervision, quality assurance, contract administration	Maintain effective coordination and facilitate timely technical decisions	Daily coordination meetings, inspections, technical meetings, formal letters and RFIs
The Contractor (ALBSTAR Sh.p.k.), its Subcontractors and Suppliers	Construction programme, safety, logistics and coordination	Ensure efficient project execution through effective communication and coordination	Daily briefings, toolbox talks, coordination meetings, progress meetings
Municipality of Shkodër and Administrative Unit of Velipojë	Local development, public services, community concerns, traffic management	Coordinate construction activities and ensure effective communication with local communities	Coordination meetings, official correspondence, consultation meetings
Albanian State Police / Traffic Police	Traffic safety, implementation of traffic management measures	Coordinate temporary traffic arrangements and maintain road safety throughout construction	Joint inspections, traffic management meetings, advance notifications

Utility Providers (Water, Electricity, Telecommunications, Sewerage)	Protection, relocation and continuity of utility services	Coordinate utility diversions and minimize service interruptions	Technical coordination meetings, utility permits, work planning meetings
Environmental and Regulatory Authorities	Environmental compliance, permit, environmental monitoring	Ensure compliance with applicable environmental legislation and permit conditions	Submission of monitoring reports, inspections, formal correspondence
Emergency Services (Police, Fire Brigade, Ambulance)	Emergency access and public safety	Maintain uninterrupted emergency access and coordinate temporary traffic arrangements	Coordination meetings, emergency response planning, advance notifications
Media and Non-Governmental Organizations (where applicable)	Public information, project transparency, environmental and social issues	Provide accurate project information and maintain transparency with the public	Official press releases, public announcements and responses through the Employer's designated representative
Vulnerable Groups			
Elderly persons, persons with disabilities, and persons with reduced mobility	Potential difficulties in accessing project information, moving safely around construction areas, or using temporary pedestrian routes	Ensure that the needs of vulnerable persons are considered during construction planning and that they have access to information and grievance channels	Accessible communication methods, ensuring safe pedestrian access, direct communication where necessary, grievance mechanism

4.3. Previous Stakeholder Engagement activities

At the time of preparation of this SEP, no formal stakeholder engagement programme has been undertaken by the Contractor beyond the activities required for project mobilization and construction coordination.

To date, the engagement activities conducted include:

- Installation of project information boards and construction site signage at the project locations, providing information regarding the project, Contractor details, and relevant contact information;
- Communication and coordination with the Albanian Development Fund (ADF), the Municipality of Shkoder, and other relevant authorities regarding construction progress, implementation requirements, and coordination of activities;

- Direct communication with local businesses and residents in the project areas when required, particularly regarding access arrangements, construction activities, and temporary disturbances;
- Communication with road users and pedestrians through site safety signs, temporary access arrangements, and traffic/pedestrian management measures;
- Establishment of the Contractor's grievance mechanism, including a complaint box at the Contractor's Site Office, as well as the maintenance of a grievance register for recording and following up concerns.

During the implementation period, no formal complaints have been received from affected communities or other stakeholders.

All stakeholder engagement activities, communications, and grievances received are documented and maintained by the Contractor throughout the construction period to ensure transparency and compliance with applicable national legislation and international good practice.

4.4. Stakeholder Engagement Program

The SEP has been developed to ensure effective, timely and transparent communication with all stakeholders throughout the Project lifecycle. Engagement activities will be adapted to the specific phase of the Project and the nature of the stakeholder's interest or potential impact. The program will be reviewed periodically and updated as necessary to reflect changes in project activities, stakeholder needs or regulatory requirements.

Target stakeholders	Reason of engagement	Communication methods	Responsibilities
Pre-construction phase			
ARRSH, Municipality of Shkodër, Administrative Unit of Velipojë, Utility Providers, Albanian State Police, Adjacent Property Owners, local businesses	Present the Project, coordinate permits and approvals, utility relocations, traffic management, construction planning and inform affected stakeholders prior to commencement of works	Coordination meetings, official correspondence, technical meetings, site visits, public notices and information boards	Employer, Supervision Engineer, Contractor (Project Manager / Community Liaison Representative)
Construction phase			
Local residents, businesses, tourism operators, road users, local authorities, emergency services, utility providers,	Provide updates on construction progress, traffic diversions, temporary access restrictions, environmental mitigation measures, health and safety, grievance management and resolution of stakeholder concerns	Regular coordination meetings, site meetings, public notices, information boards, direct consultations, emails, telephone communication, grievance mechanism and monthly progress reports	Contractor (Project Manager), Community Liaison Representative, HSE Manager, Supervision Engineer and Employer

Operational phase			
Municipality of Shkodër, Road Maintenance Authority, local community and road users. Traffic Police	Inform stakeholders of project completion, road opening, operational arrangements, close-out activities and address any outstanding issues arising during the Defects Notification Period	Final stakeholder meetings, official correspondence, completion notices, public announcements and handover documentation	Employer, Supervision Engineer and Contractor (during the Defects Notification Period)

5. Grievance Redress Mechanism

5.1 Purpose of the Grievance Mechanism

A Project Grievance Redress Mechanism (GRM) shall be established and maintained throughout the implementation of the **Reconstruction and Upgrade of Road Infrastructure in the Touristic Area of Velipoja, Shkoder – Connecting Road Buna Bridge – Shkoder–Velipojë National Road**. The purpose of the GRM is to provide external stakeholders with a transparent, accessible, fair and timely process for raising concerns, complaints or grievances related to the Project and for ensuring that these are addressed effectively and consistently.

The grievance mechanism is implemented in accordance with the stakeholder engagement requirements of the European Bank for Reconstruction and Development (EBRD) and the project-specific environmental and social requirements.

The GRM aims to resolve concerns through dialogue and consultation, prevent the escalation of disputes, and strengthen communication and trust between the Project and its stakeholders.

For the purposes of this Project, the following definitions apply:

- **Complaint:** An expression of dissatisfaction related to a Project activity or its impacts, affecting an individual or group. Complaints generally concern matters of a less serious nature, such as dust emissions, noise, vibration, temporary traffic disruptions, access restrictions or other construction-related nuisances.
- **Grievance:** A formal concern or claim raised by an individual or group who considers that the Project has adversely affected their livelihood, health and safety, property, environment, cultural heritage, or quality of life. If not addressed appropriately, grievances may adversely affect relationships with stakeholders and potentially impact Project implementation.

All grievances shall be managed through a process that is transparent, culturally appropriate, easily accessible and understandable to all stakeholders. The mechanism shall be available free of charge, without discrimination or retaliation, and shall not prevent complainants from seeking resolution

through judicial, administrative or other legal remedies available under the legislation of the Republic of Albania.

The objectives of the Project GRM are to:

- Provide stakeholders with an accessible channel to submit complaints and grievances.
- Record, classify and prioritize all grievances received.
- Investigate grievances in a fair, objective and timely manner.
- Resolve grievances through consultation with the affected parties.
- Communicate the outcome of investigations and proposed corrective actions to the complainant.
- Monitor implementation of agreed corrective measures.
- Escalate unresolved grievances to the appropriate authority where necessary.
- Maintain records of all grievances and their resolution to support continuous improvement.

5.2 Types of Grievances

Stakeholders may raise grievances related to, but not limited to, the following:

- Noise, dust, vibration and other construction-related nuisances.
- Damage to private property, buildings, fences, crops or vegetation.
- Temporary road closures, traffic diversions and restricted access.
- Health and safety concerns affecting workers or the public.
- Environmental impacts, including pollution, waste management or drainage issues.
- Disruption to local businesses or tourism activities.
- Utility service interruptions.
- Community disturbance or social impacts.
- Non-compliance with environmental, social or contractual commitments.

5.3 Responsibilities

The GRM shall be implemented jointly by the **Employer (Albanian Development Fund), the Supervision Engineer and the Contractor.**

The responsibilities of each party are summarized below:

- **Contractor:** Receive grievances, maintain the Grievance Register, investigate complaints within its area of responsibility, implement corrective actions and communicate with complainants.
- **Supervision Engineer:** Monitor implementation of the grievance procedure, verify investigations and corrective actions, and ensure compliance with contractual requirements.
- **Employer:** Provide overall oversight of the grievance mechanism, review unresolved or escalated grievances and ensure that the procedure is implemented effectively throughout the Project.

5.4 Grievance Submission Channels

Stakeholders may submit grievances through the following communication channels:

- Complaint boxes installed at construction site;
- Direct communication with the Contractor's site representatives;
- Telephone contact:

Site Engineer: Eng. Elson Laqja

Telephone: +355693244778

JVCA "K.N.P.SH. PAPEBURG & ADRIANI COMPANY SH.P.K & ALB TIEFBAU SH.P.K"

E-mail: elsonlaqja@yahoo.com

- Communication through ADF, Municipality of Shkoder, or Supervision Engineer representatives.

The grievance mechanism is available free of charge and can be accessed by all stakeholders without discrimination.

The Grievance Form is provided in **Annex 2** to this Stakeholder Engagement Plan.

Grievances may be submitted in writing or verbally. Anonymous grievances shall also be accepted and investigated to the extent possible based on the information provided.

The Grievance Form for the construction phase of the project will be revealed on the:

- Website of Municipality of Shkoder(<https://bashkiashkoder.gov.al/>)
- Website of Albanian Development Fund (<https://www.albaniandf.org/en/>)
- In the premises of Municipality (printed copies)
- At the Contractor's Site Office

5.5 Grievance Procedure

The Project shall implement the following grievance management procedure:

1. Receipt of grievance.
2. Registration of the grievance in the Project Grievance Register.
3. Acknowledgement of receipt to the complainant.
4. Investigation of the issue and assignment of responsibility.
5. Consultation with the complainant, where necessary.
6. Identification and implementation of corrective actions.
7. Communication of the proposed resolution.
8. Verification that the corrective actions have been completed.

9. Closure of the grievance and recording of lessons learned.

The Contractor shall acknowledge receipt of each grievance within **five (5) working days** and aim to provide a proposed resolution within **thirty (30) calendar days**, depending on the complexity of the issue. Where additional time is required, the complainant shall be informed of the reason for the delay and the anticipated timeframe for resolution.

Accessibility of the Grievance Mechanism

The Grievance Mechanism shall be easily accessible to all Project stakeholders.

Information regarding the grievance procedure and contact details shall be made available through:

- The website of the Municipality of Shkodër (where applicable).
- The website of the Albanian Development Fund and/or Albanian Road Authority.
- Project information boards located at construction sites.
- Printed copies available at the Municipality and Contractor's Site Office.
- Public consultation meetings and stakeholder engagement activities.

The Grievance Form shall be available in **Albanian and English**. Where necessary, reasonable assistance shall be provided to vulnerable persons or individuals who require support in completing or submitting a grievance.

Identification of Complaints

Complaints and grievances may be identified through:

- Site inspections.
- Public consultation meetings.
- Community meetings.
- Interviews with stakeholders.
- Telephone or email communications.
- Direct discussions with Project personnel.
- Formal written submissions.
- Monitoring visits by the Employer or Supervision Engineer.

Where concerns are raised informally, Project personnel shall assist stakeholders in registering the issue through the formal grievance procedure where appropriate.

Communication with the Complainant

Throughout the grievance process, regular communication shall be maintained with the complainant. The complainant shall be informed of:

- Receipt of the grievance.
- Progress of the investigation.

- Any additional information required.
- Proposed corrective actions.
- Expected resolution timeframe.
- Closure of the grievance.

If a grievance falls outside the scope of the Project or cannot be investigated through the Project Grievance Mechanism, the complainant shall receive an explanation together with guidance regarding the appropriate authority or institution responsible for addressing the matter.

Grievance Mechanism for Tourists and Seasonal Visitors

Given the location of the Project within the Velipojë tourist area, particular consideration shall be given to tourists and seasonal visitors, who may not have the opportunity to participate in public consultation activities.

To ensure that these stakeholders also have access to the Grievance Mechanism, information boards and contact details shall be installed at visible locations within the Project area. Information shall be provided in **Albanian and English** and shall include instructions for submitting complaints through the available communication channels.

Grievance Register and Reporting

All complaints and grievances received shall be recorded in the **Project Grievance Register**, regardless of the method by which they are submitted.

The register shall include, as a minimum:

- Grievance reference number.
- Date received.
- Name and contact details of the complainant (where provided).
- Description of the grievance.
- Location.
- Category of grievance.
- Responsible person.
- Investigation findings.
- Corrective actions undertaken.
- Date of response.
- Current status.
- Date of closure.

The Grievance Register shall be reviewed regularly by the Contractor and Supervising Engineer, and summary information shall be included within the Project's periodic Environmental and Social Monitoring Reports. Lessons learned from grievances shall be used to improve Project performance, stakeholder engagement and mitigation measures throughout the construction period.

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING THE STAKEHOLDER ENGAGEMENT ACTIVITIES

The successful implementation of this SEP requires the commitment of adequate human resources, clear allocation of responsibilities and effective coordination between the Employer, the Supervision Engineer, the Contractor and relevant public authorities. Stakeholder engagement shall be integrated into the overall project management process and implemented throughout the Project lifecycle.

The Contractor shall allocate sufficient personnel and resources to ensure the effective implementation of the stakeholder engagement activities described in this report. These resources shall include personnel responsible for community liaison, grievance management, public communication and coordination with local authorities and affected stakeholders.

The principal responsibilities for stakeholder engagement are summarized below:

Role	Responsibilities
Employer (ADF)	Overall oversight of stakeholder engagement activities, approval of the Stakeholder Engagement Report, monitoring implementation, coordination with governmental institutions and review of significant stakeholder issues.
Supervision Engineer (JV. “P.A.C.E. / ERALD-G”)	Monitor implementation of the Stakeholder Engagement Report, verify compliance with contractual and environmental and social requirements, review stakeholder concerns and oversee the effectiveness of the Grievance Redress Mechanism.
Contractor (JVCA “K.N.P.SH. PAPEBURG & ADRIANI COMPANY SH.P.K & ALB TIEFBAU SH.P.K”) – Project Manager	Overall responsibility for implementing stakeholder engagement activities during construction, ensuring adequate resources are available, coordinating with the Employer and Supervising Engineer, and ensuring timely resolution of stakeholder concerns.
Contractor – Community Liaison Representative (or designated Site Representative)	Serve as the primary point of contact for local communities, businesses and other stakeholders; maintain communication with affected parties; receive and record grievances; organize consultations where required; maintain the Stakeholder Engagement Register and Grievance Register.
Contractor – HSE / Environmental Officer	Support communication regarding environmental, health and safety matters; monitor implementation of mitigation measures; participate in stakeholder consultations related to environmental and social issues; assist in investigating grievances related to environmental or safety impacts.

Municipality of Shkodër / Administrative Unit of Velipojë	Support dissemination of Project information, facilitate communication with local communities and coordinate matters related to local services, traffic management and public information.
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The Contractor shall maintain a **Stakeholder Engagement Register** documenting all engagement activities undertaken during the Project, including meetings, consultations, information disclosures, grievances received, actions taken and follow-up measures. The register shall be updated regularly and made available to the Employer and the Supervising Engineer upon request.

Where significant construction activities may affect local communities, businesses or road users, the Contractor shall provide advance notification through appropriate communication channels, including information boards, written notices, direct meetings and coordination with local authorities.

The effectiveness of stakeholder engagement shall be reviewed periodically throughout the Project. The Stakeholder Engagement Report and associated procedures may be updated where necessary to reflect changes in Project activities, stakeholder expectations, regulatory requirements or lessons learned during implementation.

7. Adequate financial and administrative resources shall be allocated by the Contractor to ensure that stakeholder engagement activities, public information measures and the Grievance Redress Mechanism are implemented effectively throughout the duration of the Project.

MONITORING AND REPORTING

Monitoring and reporting are essential to ensure that the SEP is effectively implemented and that stakeholder concerns are identified, addressed and documented throughout the Project lifecycle. The Contractor, in coordination with the Supervision Engineer and the Employer, shall monitor the implementation of stakeholder engagement activities, assess their effectiveness and identify opportunities for continual improvement.

Monitoring shall include regular review of stakeholder engagement activities, communication with affected communities, operation of the Grievance Redress Mechanism (GRM), and verification that commitments made within this SEP are being fulfilled. Where deficiencies or emerging issues are identified, appropriate corrective actions shall be implemented promptly.

The Contractor shall maintain the following records throughout the Project:

- Stakeholder Engagement Register.
- Grievance Register.
- Public consultation records and attendance lists.
- Minutes of Meetings.
- Correspondence with stakeholders.
- Records of information disclosure activities.
- Corrective actions and follow-up measures.

The implementation of stakeholder engagement activities shall be reviewed periodically during the construction phase. Particular attention shall be given to:

- Number and type of stakeholder engagement activities undertaken.
- Number and categories of stakeholders engaged.
- Information disclosed to stakeholders.
- Number and type of grievances received.
- Response and resolution times for grievances.
- Status of outstanding grievances.
- Effectiveness of mitigation and corrective measures.
- Emerging stakeholder concerns and recommended improvements.

A summary of stakeholder engagement activities and grievance management shall be included in the Contractor's periodic Environmental and Social Monitoring Reports and Monthly Progress Reports submitted to the Supervision Engineer and the Employer.

Where significant stakeholder concerns arise or where construction activities substantially change, the SEP shall be reviewed and updated to reflect the revised Project conditions and stakeholder requirements.

Key Performance Indicators (KPIs)

The effectiveness of stakeholder engagement shall be monitored by using, as a minimum, the following Key Performance Indicators:

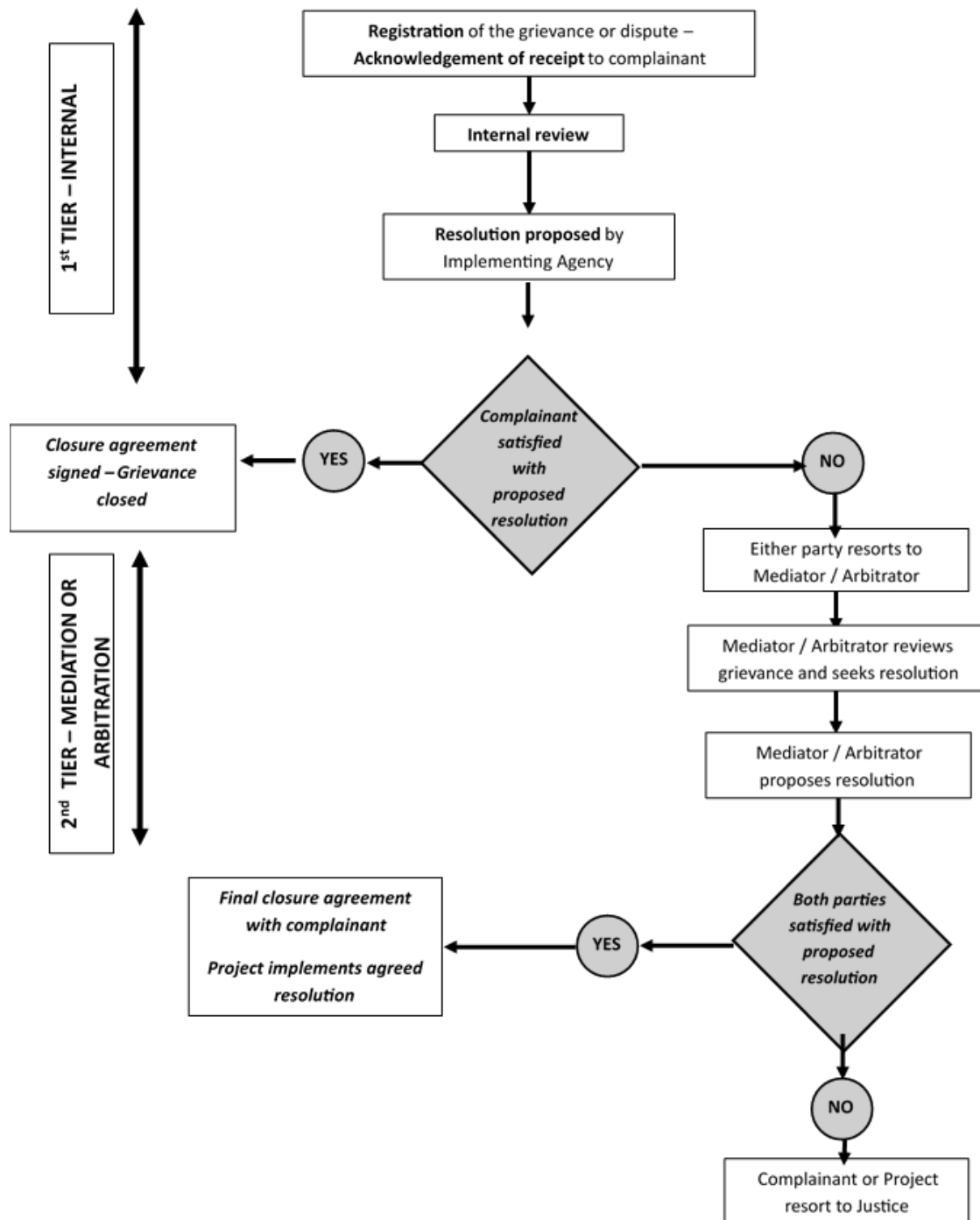
Indicator	Target
Stakeholder engagement activities implemented in accordance with the Stakeholder Engagement Plan	100%
Grievances acknowledged within five (5) working days	100%
Grievances resolved within thirty (30) calendar days (where practicable)	≥ 90%
Grievances recorded in the Grievance Register	100%
Stakeholder engagement records maintained and updated	100%
Environmental and Social Monitoring Reports submitted on time	100%
Outstanding grievances reviewed during monthly project meetings	100%

The monitoring and reporting process shall be considered a continuous activity throughout the Project and shall support transparent communication, timely resolution of stakeholder concerns, compliance with national legislation and the requirements of good international practice, including the EBRD Environmental and Social Policy and Performance Requirement 10 (PR10).

8. ANNEXES

The following annexes form an integral part of this Stakeholder Engagement Report and shall be used during the implementation of stakeholder engagement activities throughout the construction period.

Annex 1. Grievance Management Flow Chart



Annex 2. Example of the Grievance Form

Project: “Reconstruction and Upgrade of Road Infrastructure in the Touristic Area of Velipoja, Shkoder – Connecting Road Buna Bridge – Shkoder–Velipojë National Road”

Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	First name _____ Last name _____ ... I wish to raise my grievance anonymously ... I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	☐ By Post: Please provide mailing address: _____ _____ _____ ☐ By Telephone: _____ ☐ By E-mail: _____
Preferred Language for communication	☐ Albanian ☐ English
Description of Incident or Grievance:	
What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	☐ One time incident/grievance (date _____) ☐ Happened more than once (how many times? _____) ☐ On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Please return this form to: Eng. Elson Laqja, JVCA “K.N.P.SH. PAPEBURG & ADRIANI COMPANY SH.P.K & ALB TIEFBAU SH.P.K” Tel.: +355693244778 ;or, E-mail: elsonlaqia@yahoo.com .	