Regional Challenge Fund - Support Programme to vocational education and training in the Western Balkan 6 Economies

Project

BiH Gradiška Technical School

Document title

Environmental and Social Management Plan (ESMP) – Short version for Contractor

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Abbreviations

AOI Area of Influence (including areas of direct and indirect influence)

CIF Chamber Investment Forum

CT Cooperative Training

CV Curriculum Vitae

EHS Environment, Health and Safety

ESHS Environmental and Social and Health and Safety

ESMP Environmental and Social Management Plan

ESMF Environmental and Social Management Framework

ESS Environmental and Social Standards

FMU Fund Management Unit

GIIP Good international industrial practice

H&S Health and Safety

ILO International Labour Organisation

KfW Kreditanstalt für Wiederaufbau

PU Project Unit

RCF Regional Challenge Fund

OHS Occupational Health & Safety

SEF Stakeholder Engagement Framework

SEP Stakeholder Engagement Plan

SoW Scope of Work

ToR Terms of Reference

TVET Technical and Vocational Education and Training

VET Vocational Education and Training

VTI Vocational Training Institute

WB6 Western Balkan 6 Economies (Albania, Bosnia, Herzegovina, Kosovo, Montenegro, North Macedonia, Serbia)

WMP Waste Management Plan

1 Programme scope and objectives

1.1 Project introduction

The consortium partners are planning to perform a:
VTI rehabilitation project named „Zajedno do kvalitetnijeg dualnog obrazovanja u Gradišci" (Together to better quality of dual education in Gradiška)
The Project will be conducted at a site in:
Gradiška, Bosnia and Herzegovina
The beneficial Vocational Training Institution is:
Tehnička škola Gradiška (Technical school Gradiška), Kosovske Djevojke 18, 78400 Gradiška, BiH
The construction activities will be supervised by the Implementation Consultant
IPC, PLANCO, SWISSCONTACT, KPMG BULGARIA.

The **Regional Challenge Fund (RCF)** is a financing facility designed to increase employability, especially youth. It boosts the competitiveness of enterprises in **Western Balkan 6 economies** by funding investments in equipment and infrastructure for selected cooperative or dual training projects implemented through partnerships between vocational training institutes and enterprises. The grants are allocated through a competitive regional challenge.

The RCF supports initiatives to improve or introduce cooperative training programmes, work-based learning programmes, and dual training programmes, at all levels of education (secondary, tertiary, adult education) in accordance with national regulations.

The Employer selected several Vocational Training Institutions in different cities of the 6 Western Balkan States to be rehabilitated and equipped in the framework of this project, focussing on the improvement of cooperative vocational education and training.

1.2 Reason for this ESMP

A Category B project that has an ESHS impact entail the renovation, extension, adaptation and construction of training-related facilities at the premises of the VTI (so called classroom adaptation), is including at least one of the following: electrical installation, ICT installations, HV installations, sanitary installation, demolition works, dismantling of a structure or part of a load-bearing structure, earthmoving works, work in confined spaces, scaffolding (work at height limited to the use of ladders), roofing works or rehabilitation of roof protection, lifting equipment for material handling, such as cranes, work with hazardous substances in significant quantities, works resulting in manipulation of asbestos or asbestos is presumed to be present, on-site material manufacturing, such as production of brick or concrete blocks, manufacturing of windows and doors, and production of gravel and stones.

1.3 Referenced documents

This ESMP refers to:

- the Environmental and Social Management Framework for the RCF WB6 VET Support Programme (main document[1] incl. the annexes[2]) that provides specifies guidelines and procedures to identify responsible parties for all project implementation phases, including monitoring requirements. It shall be considered as a guideline for tackling of all possible environmental and social impacts arising during implementation of "Regional Challenge Fund - Support to VET in the WB6".

- The Environmental and Social Screening, Impact Assessment and Management Plan (ESSIAMP) which provides a consolidated summary of all the Environmental, Social, Health and Safety (ESHS)[3] commitments relevant for the construction phase of the Project.

1.4 This ESMP

Based on the findings of the Environmental and Social Screening and the consequent impact assessment based on defined findings, this Environmental and Social Management Plan (ESMP incl. supporting management plans) is elaborated. In order to mitigate and eliminate negative impacts and consequences, which might occur during various project phases, the Environmental and Social Management Plan (ESMP) was developed for **the attention of the Project Unit (PU) and the RCF program monitoring.**

[1] Regional Challenge Fund - Support Programme to vocational education and training in the Western Balkan 6 Economies: Environmental and Social Management Framework, Report, September 2022, 107 pages.
[2] Annex 1 E&S Screening Form, Annex 2 Waste Management Framework, Annex 3 Stakeholder Engagement Framework, Annex 4 – Environmental & Health & Safety.
[3] For the sake of simplicity, the acronym ESHS is used throughout this document, but this acronym should be interpreted as including environment, social, occupational health and safety, human rights and labour aspects.

This management plan is intended to be a living document that might be **adjusted by the designer and contractor in line with the project development and possible project changes taken place**.

Any amendments from the designer's and contractors' sides shall be brought to attention of the environmental and social management team (the PU/IC) and to be approved by the ESHS manager of PU/IC.

The nature of amendments might be related to the detailed investigation of the subjected objects and the outcome of the designer's technical solutions.

Parts of the ESMP can be **updated** as the project proceeds through detailed design and construction to reflect the results of discussions with stakeholders and to include details of any other E&S developments.

The ESMP table (see section 8.4) outlines the typical environmental and social (E&S) impacts and associated mitigation measures that need to be considered at minimum in the context of Category B Moderate Risk Project activities.

Table 11: omitted.

Table 22: omitted.

2 Stakeholders

2.1 Statutory entities/ authorities/ ministries involved with the Project

The counterparts (public authorities if involved in the Project) shall be informed on the ESMP and involved in its implementation. Reference is made to the tables provided in the Stakeholder Engagement Plan.

2.2 Local stakeholders affected by/ involved with the Project

Other local stakeholders, e.g. current landowners/ users, communities adjacent to the project site, local decision makers, opinion leaders (traditional or formal) are given in the Stakeholder Engagement Plan.

2.3 Roles and responsibilities

2.3.1 Project Unit (PU)

The PU/Implementation Consultant has the overall responsibility for environmental and social management **during the design and construction phases** of the Project. This includes the following responsibilities:

- Ensuring compliance with all relevant national legislation, as well as with the environmental controls and mitigation measures contained in this ESMP.
- Ensure that the design and planning is in compliance with national requirements and aligned with Good international industrial practice.

- Monitoring the performance of contractors and sub-contractors used for providing workforce, supplies and services.
- Acting as point of contact for consultation and feedback to stakeholders and the public (stakeholder engagement).
- Training of construction workers to raise awareness in the fields of ESHS topics and in general implementation of this ESMP.

Table 34: Responsibility Matrix

Responsibilities						
	PU	IC	Designer	Works Contractor	Supervisor	Comment
Responsible for implementation of this ESMP:	☒	☒	☒	☒	☒	…
Responsible for Monitoring:	☒	☒	☐	☐	☒	…
Responsible for E&S related supervision of the contractor and ESMP implementation	☒	☒	☐	☐	☐	…

Table 45: omitted.

Table 56: omitted.

2.3.2 Contractor

The Contractor is required to fulfil the commitments as set out in this ESMP and to ensure that its sub-contractors fulfil the ESMP. This includes the following:

- To ensure implementation of the ESMP and report on any deviations or changes to be introduced to the PU.
- Communicate any environmental issues and incidents to the PU immediately.
- To maintain constant training of the construction workers (incl. subcontractors) to raise awareness in the fields of E&S and OHS topics and in general implementation of this ESMP.

2.3.3 Site Supervisor

A Site Supervisor, engaged by the Client/IC, as an independent expert involved on behalf of the owner, is required to regularly supervise the contractor's and subcontractor's activities and his compliance to the commitments set out in this ESMP.

Table 67: omitted.

Table 78: omitted.

3 Stakeholder Engagement and Grievance Mechanism

3.1 Local Communities Engagement

The PU will ensure that the **local communities** are informed at an early stage about the planned Project, timelines, expected impacts and communication channels and will assign personnel in charge of the engagement with stakeholders. The PU will also seek for feedback from the communities about the project.

3.2 Community Grievance Mechanism

As part of its community liaison process, the PU will initiate and implement a Grievance Mechanism to ensure that all stakeholders' comments, suggestions and objections are captured and considered.

It will allow the affected community and the workers to express their concerns and any complaints directly to the PU.

Contact details and information on the procedure, including a grievance form, will be distributed to the local communities.

All comments and complaints will be investigated by the PU and appropriate action taken as necessary. Records of all complaints and actions will be maintained on site.

→ *See Annex 2 for separate project-related Stakeholder Engagement Plan.*

4 Assessment of Environmental and Social impacts related to the project

4.1 Assessment of Key Environmental and Social Impacts

The table below presents results on assessment of key environmental and social impacts, which have been identified during facilities' screening on potential hazardous materials presence, as well as potentials E&S issues might occur during the project implementation.

All identified impacts have been analysed with consideration of possible influence on both environmental and social spheres and have been assessed in line with outlined in the ESMF Methodology for Impact Assessment.

Table 9: Key E&S impacts overview

		PHASES			EVALUATION
Main Topic	**Impact Description**	**Pre-Construc-tion**	**Construction**	**Operation**	**Level of Impact**
Noise and Vibration	The construction process will most likely be resulted with a rise of noise level due to transport vehicles (transportation of construction materials and generated solid waste), work of equipment and presence of workers. This will be a major source of disturbance and noise pollution, if not well mitigated, can be a source of disturbance of building occupant and surrounding neighbourhoods.	NO	**YES**	NO	Medium
Traffic and Transport	Movement of construction transport to and from the site may potentially create a road load for citizens living in the vicinity of the construction site;	NO	**YES**	NO	Medium

		PHASES			EVALUATION
Main Topic	**Impact Description**	**Pre-Construc-tion**	**Construction**	**Operation**	**Level of Impact**
Dust and exhaust emissions	Excavation and levelling works may be a source of dust on the site and surrounding area for the transportation of construction materials to the site. Vehicles for transportation of construction materials to the site and construction waste out of it will contribute to the to increases in emissions of CO2, NO2	NO	**YES**	NO	Low
Water and energy consumption	Increase of water demand to the expected to be caused by wetting of the construction area to minimize creation of dust, as well as due to demand from workers' side. Growth of energy demand will be reflected mainly with increase of electricity consumption for needs of working equipment and construction sites lighting for the safety reasons, as well as increase of fuel (diesel) consumption for transportation purposes and some machinery running.	NO	**YES**	NO	Low
Waste management	It is likely expected that significant amount of solid waste will be generated during the project construction. These wastes will/may include metal cuttings, paper bags, empty cartons, empty paint and solvent containers, broken glass among others, which are more detailed specified in the Waste Management Plan.	NO	**YES**	NO	Medium

5 Environmental and Social Management Plan

5.1 Making of Environmental and Social Management Plan

In order to mitigate and eliminate negative impacts and consequences, which might occur during various project phases, **the Environmental and Social Management Plan (ESMP) was developed for the attention of the Project Unit (PU) and the RCF program monitoring.**

This management plan is intended to be a **living document** that might be adjusted by the designer and contractor in line with the project development and possible project changes taken place.

Any amendments from the designer's and contractors' sides shall be brought to attention of the environmental and social management team (the PU/IC) and to be approved by the ESHS manager of PU/IC.

The nature of amendments might be related to the detailed investigation of the subjected objects and the outcome of the designer's technical solutions.

The proposed mitigation, supervision and monitoring measures, for various project phases, are summarized in the ESMP table below.

5.2 Applicable Environmental and Social Standards of the World Bank

World Bank's Environmental and Social Standards (ESS) from the Environmental and Social Handbook have become globally recognized as best practice in dealing with environmental and social risk management. It stipulates standards for 10 topics. Considering that the project might generate some environmental and social impacts, it triggers the Environmental and Social Standards as indicated in Table 9.

Table 10: Relevant World Bank E&S standards in this project

ESS No.	Topic	KfW ESMP	Relevant in this project
ESS 1	Assessment and Management of Environmental and Social Risks and Impacts;	A	Yes
ESS 2	Labour and Working Conditions;	C	Yes
ESS 3	Resource Efficiency and Pollution Prevention and Management;	B	Yes
ESS 4	Community Health and Safety;	D	Yes
ESS 5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;	n.a.	No
ESS 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources;	n.a.	No
ESS 7	Indigenous Peoples/ Historically Underserved Traditional Local Communities;	n.a.	No
ESS 8	Cultural Heritage;	n.a.	No
ESS 9	Financial Intermediaries;	n.a.	No
ESS 10	Stakeholder Engagement and Information Disclosure.	D	Yes

The applicable Environmental and Social Standards are outlined in detail in the following table i.e. Environmental and Social Management Plan.

5.3 Basic ESHS considerations

The ESMP sets out all ESHS commitments that are to be fulfilled by the various actors in the project (PU, IC, DESIGNER, CONTRACTOR) - during the Project activities and covers information on the management and/or mitigation measures that will be taken into consideration to address impacts with respect to the following phases:

- Pre-construction
- Construction

5.4 Environmental and Social Measures to be Applied in various phases

Being a generic table, the rightmost column indicates, whether each item applies for this project.

Table 11: ESMP Table for Contractor

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	**Subject**	**Management objective**	**Mitigation action**	**Target/ standard / guideline**	**Person responsible**	**Frequency of action/ date of completion**	**Monitoring and evaluation criteria**	**Status**
Pre-investment phase (pre-construction)								
ESS 1. Assessment and management of environmental and social impacts and risks								
1.3 / A8	OHS/ESHS training	Employees with direct responsibility for activities relevant to the project's social and environmental performance are adequately qualified and trained so that they have the knowledge and skills necessary to perform their work.	An Induction training to be provided to all project employees and contractors on ESHS, worker's code of conduct and relevant procedures. Contractor shall develop and approve the OHS/ESHS training programme and schedule.	KfW E&S Guidelines WB ESS 1 GIIP	Contractor	Prior to the construction phase and further in line with ESHS plan training schedule	Training reports are in place Trainings for implementation team and civil workers are performed; review of training reports.	☒

[4] The codes (A1 – D51) in the column 'Ref' refer to KfW's Standard Bidding Document for Procurement of Small Works – Section VII Works Requirements – 1b) Specifications for Environmental, Social, Health and Safety Management (ESHS) of the Works as much as possible.

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
1.6.2/ A1 D42 D48 D50	Construction Management Plan	Compliance with national legislation, KfW Sustainability Guideline, World Bank Environmental and Social Standards, World Bank Group General and sector specific ESHS Guidelines, as well as ILO standards	To develop a Construction Management Plan with consideration of high-risk Project impacts, as well as of adequate construction traffic management plan, regulation of routes, time and speed of traffic used for construction, noise impacts, waste management and general requirements on OHS issues, etc.	KfW Sustainability Guideline WB ESS 1 ILO GIIP	Contractor	Design phase - Prior to construction phase	The Construction Management Plan is developed by the Contractor and approved by PU/IC. Further approval processes shall be defined based on project implementation procedures between KfW and PU.	☒
ESS 2. Labour and Working Conditions								
2.1 D42	Human resource policy and access to information	Ensure strict compliance with international labour and human right standards for employees, including Contracting and subcontracting.	Develop a Human Resource Policy / or update (review) the existing that outlines the approach to managing employees and stipulates the rights of workers. The strategy shall be developed for both construction and operation phase of the project. It shall include information relating to working conditions, hiring practices, terms of employment (e.g. entitlement to wages, hours of work and breaks, overtime arrangements and compensation, rest days and holidays, leave –annual, maternity, parental-, illness absences, benefits), freedom of	KfW E&S Guidelines WB ESS 2 GIIP National legislation	Contractor	Prior to a construction phase	Availability of a Human Right Policy. Informative workshop/training of employees regarding this.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			association and collective bargaining rights, and training and skills development etc. It must be available to all employees in an understandable format. Ensure that all workers are aware of the content, including Contractors' side.					
2.2 D42	Workers grievance mechanism	Ensure a proper communication and prompt feedback between management and workers for exclusion and dispatching of conflicts at a working place	Set up an independent grievance mechanism where workers (and their organizations, where they exist) can raise reasonable workplace concerns, including a possibility of anonymous complaints. This mechanism shall be introduced as part of a **Stakeholder Engagement Plan**. The mechanism shall address complaints in a timely and effective manner without fear of retribution and will thus allow for anonymous complaints. Introduction of incentives programs should be considered, where appropriate.	KfW E&S Guidelines WB ESS 2 GIIP National legislation	Contractor	Design phase - Prior to a construction phase	Availability of the Workers Grievance Mechanism with identified measures and methods of communication and response and approved by PU.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
ESS 3. Resource Efficiency and Pollution Prevention and Management								
3.1 B16	Waste management	Compliance with KfW environmental requirements and prevention of negative impacts	Engage a licensed Waste management company for disposal of waste, including hazardous waste Develop/Adopt a **Waste Management Plan,** following specifications regarding identified hazardous materials and areas of typical implication identified during screening stage (**ESS**), as well as specific volumes, types, as well as indicate methods of its abatement.	KfW Sustainability Guideline WB ESS 3 GIIP National legislation	Contractor/ Sub-contractor -	Design stage - Prior to construction phase	Waste management plan – monitoring of proper plan update by PU/IC or Contractor according to each implementation phase. Inventory study on hazardous waste with proposed abatement plan approved by PU/IC	☒
3.2 C31a	Management of chemicals and dangerous substances	Prevention of pollution by chemicals and dangerous substances	Preparation of temporarily storage on site of all hazardous or toxic substances, as well as containers for hazardous substances. Assure development of internal work instruction on work with dangerous substances and chemicals and organization of training for all employees.	KfW Sustainability Guideline WB ESS 3 GIIP National legislation	Contractor/ Sub-contractor -	Design stage - Prior to construction phase	Pre-organized storing places, containers with proper labelling and signs. Developed instructions approved by ESHS manager.	☒
3.3 C31	Emergency prevention, preparedness and response	Prevent emergencies and accidents during construction, establish procedures for, establish procedures for prompt response and readiness to act.	To develop a plan / instructions on emergency prevention, pre-readiness and response, which shall be a part Health and Safety plan.	KfW Sustainability Guideline WB ESS 3 GIIP National legislation	Contractor	Design stage - Prior to a construction phase	Plan of emergency prevention, pre-readiness and response approved by OHS/ESHS manager of IC/PU.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
ESS 4: Community Health and Safety								
4.1 C22	Health and Safety management plans and systems	Guarantee occupational, health and safety conditions on the construction sites and during operational phase	Develop Health and Safety management plans and systems to identify health and safety risks for each activity during construction followed by identification of appropriate mitigation measures, including Emergency Response Measures – ESHS Guideline Develop specific instructions for different type of works (e.g. works with fire, works on height etc.) with further training of staff. Prior starting civil works, all workers must pass labour safety training course. In addition, it is necessary to carry out the routine inspection of the machinery and equipment for purpose of the trouble shooting and observance of the time of repair, training and instruction of the workers engaged in maintenance of the machinery, tools and equipment on safe methods and techniques of work.	KfW Sustainability Guideline WB ESS 4 GIIP National legislation	Contractor	Design stage - Prior to a construction phase	Availability of Occupational and H&S (ESHS) plan approved by PU/IC. Assure awareness of own and Contractors' employees about OHS/ESHS plan's requirements prior to construction works.	☒
ESS 10. Stakeholder engagement								

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
10.1 D47	Stakeholder Engagement Plan	Respective information sharing and involvement of all identified project stakeholders within all project development and implementation stages Ensure prompt and adequate response to all complaints and comments from stakeholders	Adoption and implementation of **the Stakeholder Engagement Plan (SEP)** for communication with the public and stakeholders including grievance mechanisms (GM) during the construction phase. Establish a mechanism for the work with vulnerable groups and develop a plan for safety building occupation with specific consideration of disabled needs. Prepare and implement a grievance mechanism . Identify the responsible persons for GM operation. Put grievance contact details on publications such as leaflets and signage and make available during public and other meetings/consultations. Maintain records of grievances and correspondence with complainants. Develop and implement procedures for communication with employees and stakeholders. Adopt and implement a Procedure for submission and review complaints and proposals from employees (here reference to 2.2) and population. Before any beginning of the work it is recommended to inform all potentially affected parties and especially the neighbours either directly or through local billboards or newspapers on the	KfW E&S Guidelines WB ESS 10 GIIP National legislation	Contractor	Design stage - Prior to a construction phase	Developed Stakeholder Engagement Plan approved by KfW and PU/IC. Register of complaints and responses, separately for workers and public. Communication procedure developed and approved by the KfW and PU/IC.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			Project activities and available communication/complaints channels.					
Construction phase								
ESS 1. Assessment and management of environmental and social impacts and risks								
1.2 A7	Permitting / Commissioning	Operation compliant with BIH legislation / Law on Construction	Ensure obtaining and presentation of required permits for building operation under the law of construction.	Current national legislation KfW E&S Guidelines WB ESS 1 GIIP	Contractor	Prior to operation phase / Commissioning	The operation permit is obtained.	☒
ESS 2. Labour and Working Conditions								
2.1 D42	Human resource policy	Ensure workers' rights in line with international and national standards.	Assure (control and monitoring) Contractor's compliance with the KfW Environmental and Sustainability Guidelines, ILO and WB Standards on OHS, including duration of a working day, availability of rest and sanitation rooms, access to drinking water at the construction sites; registry book of working day duration etc.	KfW E&S Guidelines WB ESS 2 GIIP ILO Guidance National legislation	Contractor	Construction phase	Availability of rest rooms, sanitary places, excess to drinking water; Registry book of duration of a working day.	☒
2.2 D42	Workers grievance mechanism	Ensure a proper communication and prompt feedback between management and workers for	Implementation (control and monitoring) of worker grievance mechanism.	KfW E&S Guidelines WB ESS 2 GIIP	Contractor	Construction phase	Availability of the Workers grievance mechanism.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
		exclusion and dispatching of conflicts at a working place during construction phase		ILO Guidance National legislation			Reporting on complaints and responses to PU/IC. Progress Report/Completion Report.	
2.3 A1	Sub-contractor management	Ensure sub-contractors' compliance with international and national legislation on labour standards	Implementation of sub-contracts management and monitoring including compliance with the Human Resource Policy. Verification of sub-contractor's employees' professional trainings on labour rights, availability of personal protective equipment, access to the worker grievance mechanism and registration of accidents etc.	KfW E&S Guidelines WB ESS 2 GIIP ILO Guidance National legislation	Contractor	Construction phase	Reports on labour audits Accident registry book. Reporting on complaints and responses. Progress Report/Completion Report.	☒
ESS 3. Resource Efficiency and Pollution Prevention and Management								
3.1 B14	Emissions to atmospheric pollution, to water and soil	Reduced risk of air emissions and mitigated soil and water pollution	Strict compliance, implementation and monitoring of prior developed Construction Management Plan and Waste Management Plan, with consideration of adequate construction traffic management plan, regulation of route, time and speed of traffic used for construction etc. During rehabilitation activities it is necessary to use debris-chutes and to keep demolition debris in controlled area, spraying with water to reduce debris dust. It is also necessary to	KfW E&S Guidelines WB ESS 3 GIIP National legislation	Contractor	Construction phase	Monitoring program on compliance to national regulations. Progress Report/Completion Report.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site. It is strictly prohibited burning of construction waste material at the site. For the transportation of any other dusty material to the rehabilitation site watering or covering of the cargo should be implemented. Reduction of dust on rehabilitation site during dry season of the year can be accomplished by watering the ground surface. Workers should be introduced with protective closes and respirators.					
3.2 B15	Noise emissions	Mitigated negative noise impacts Compliance with national regulations Elimination of disruptions and change in quality of leaving environment for stakeholders	Regulate route, time and speed of traffic used for construction. The noise should be limited by using good management practice and limiting works on regular daily shift. The construction equipment and machinery used should be calibrated according to the state noise standards.	KfW E&S Guidelines WB ESS 3 GIIP National legislation	Contractor	Construction phase	Monitoring program on compliance to national regulations. Progress Report/Completion Report.	☒
3.3 B10 B12 B18	Ambient conditions and environmental quality standards	Prevent damages to the environment	Compensate damages have been made to the surrounding environment during construction works. Assure good housekeeping of rehabilitated objects, which related to general good practice of keeping the	KfW E&S Guidelines WB ESS 3 GIIP National legislation	Contractor	Construction phase	Restored and cleaned surrounding area of rehabilitated objects prior to commissioning.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			sites tidy and organized, including environmentally relevant activities such as the storage of hazardous materials, access restrictions to non-personnel and workplace health and safety.				Progress Report/Completion Report.	
3.4 B16	Waste management	Ensure proper Waste Management	**Monitoring and control over implementation of prior approved Waste Management Plan,** which outlined key waste management principles during building rehabilitations works, among which are the following: • Building materials shall be stored only temporarily on the construction site. • Construction site shall be regularly cleared. • Commitment to good operation practices and responsibilities must be required from all the contractors. • Guidance for workers on proper waste and chemical handling shall be arranged by Contractors. • Waste fractions shall be separated and recycled when possible.	KfW E&S Guidelines WB ESS 3 GIIP National legislation	Contractor	Construction phase	Adequate waste management controls in place. Progress Report/Completion Report.	☒
3.5 B12 B13	Management of chemicals and dangerous substances	Prevention of environment pollution with chemicals and dangerous substances	Temporarily storage on site of all hazardous or toxic substances must be organized in safe containers and labelled with details of composition, properties and handling information.	KfW E&S Guidelines WB ESS 3 GIIP	Contractor	Construction phase	Organized special storage places, labelled containers and contracts with licensed companies for	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			The containers of hazardous substances should be placed in a leak-proof container to prevent spillage. The wastes are transported by specially licensed companies and disposed in a licensed facility. Paints with toxic ingredients or solvents or lead-based paints will not be used.	National legislation			chemical and dangerous substances disposal. Progress Report/Completion Report.	
3.7 B12 B14	GHG emissions	Control over projected release of GHG emission and prevention of additional emissions deposit	During construction, prevent the use of transport and other mobile means and installations in which the content of pollutants in the exhaust gases exceeds the norms or levels of harmful influence of physical factors. Strict following of the Construction Plan, which shall identify requirements to vehicles, construction techniques and big machineries, as well as requirements to such equipment maintenance.	KfW E&S Guidelines WB ESS 3 GIIP National legislation	Contractor	Construction phase	Maintenance of vehicles and registration all machines and technics on compliance to required emission standards.	☒
ESS 4: Community Health and Safety								
4.1 C22	Health and Safety management plans and systems	Ensure occupational and public health, safety and security	Implement (control and monitoring) the Health and Safety management plans and systems to identify health and safety risks for each activity during construction followed by identification of appropriate mitigation measures, including Emergency Response Measures.	KfW Environmental and Sustainability Guidelines WB ESS 4 GIIP	Contractor	Construction phase	Reporting on OHS/ESHS Plan monitoring to the PU/IC. Progress Report/Completion Report.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			Control of organizing the training of fire safety rules for all employees. Verification of availability of protective equipment, rubber gloves, respirators, goggles and breathing mask with filter, as well as helmets. Perform the installation of necessary fencing of construction sites (security, protective or signalling). Special attention should be paid to welding operations, etc.	National legislation				
4.2 C31	Emergency preparedness and Response Plan	Assure adequate staff readiness to emergency situations in line with requirements of developed Response Plan	Control over compliance by employees and Contractors with Emergency Preparedness and Response Plan / instruction, as part of Health and Safety Plan, which include but not limited to: ▪ ensure safety at and around a construction site. The construction site should be fencing. ▪ ensure installation of a security lighting all around the construction site and access roads. ▪ ensure and prevent the use of open fire in not appropriate area by arranging of properly secured places ▪ perform an inclusive employees' training program to cover land access protocols, road safety etc. ▪ ensure, that roads, planned to be used for construction materials	KfW Environmental and Sustainability Guidelines WB ESS 4 GIIP National legislation	Contractor	Construction phase	Reporting on Preparedness and Response Plan / instruction monitoring to the PU/IC.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			transportation, are properly equipped with awareness sign and limit transportation of construction material, with a range of working day period. ▪ ensure personnel awareness about work with hazardous materials and related health and safety issues, etc.					
ESS 10. Stakeholder engagement								
10.1 D47	Stakeholder engagement plan	Assure appropriate and full implementation of the prior developed and approved SEP and correspondence to the international standards on rights and interests of vulnerable groups and specifically to the disabled building users (employees and students)	Control over strict following of the SEP regarding the mechanism on work with vulnerable groups, including: ▪ timely information about issues and difficulties related to the construction process; ▪ organization of informative meetings and workshops to discuss specific construction activities that may influence people, provide recommendation to such issues and give a guidance on use of personal protective equipment to enhance possible negative health impacts; ▪ establishment of a separate grievance mechanism developed for the vulnerable groups and registration of all claims and responses, etc. Ensure adequate measures for safety and barrier-free access to the facilities	KfW Environmental and Sustainability Guidelines WB ESS 10 GIIP National legislation	Contractor	Construction phase According to a schedule on work with vulnerable groups developed within the SEP.	Availability of grievance mechanism for vulnerable groups and claims registry book. Progress Report/Completion Report to KfW on communication, complaints and responses.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status
			for people with disabilities. Insure timely and specifically addressed communication of interruptions or disturbances caused by the reconstruction works.					
10.2 D47a	Vulnerable groups	Involvement and work with all identified stakeholders during construction phase	Control over implementation of the Stakeholder Engagement Plan, including the following procedures: ▪ submission and review of complaints and proposals; communication procedures for public, stakeholders (companies, NGOs and initiative groups affected by the project) and employees (about working conditions, including OHS/ESHS issues at the workplace, and relationships on the workplace), etc.	KfW Environmental and Sustainability Guidelines WB ESS 10 GIIP National legislation	Contractor	Construction phase According to the SEP schedule.	Reports/protocols on public consultations. Progress Report/Completion Report.	☒
10.3 D47	Community Grievance mechanism	Guarantee of Grievance mechanism in place and accessible for all stakeholders	Control constant access of all stakeholders to the Grievance mechanism on the construction site, with a possibility of anonymous claiming. Control over the constant presence of all related information (contact person, phones, emails etc.) on informative boards on the construction sites and municipal ones. Ensure correct and timely response to the stakeholders claims and questions with registration in the book.	KfW Environmental and Sustainability Guidelines WB ESS 10 GIIP National legislation	Contractor	Construction phase	Established Grievance mechanism with claims-response registry, established communication options (emails, post, hot lines etc.). Progress Report/Completion Report.	☒

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN								
Ref[4]	Subject	Management objective	Mitigation action	Target/ standard / guideline	Person responsible	Frequency of action/ date of completion	Monitoring and evaluation criteria	Status

5.5 ESMP Support Management Plans

Considering the Project scope, identified potentials E&S and OHS impacts and the consequent suggested mitigated and/or enhancement measures, the following additional management plans might be developed by the contractor with the support of PU (approval and monitoring on implementation).

The following documents are:

- SEP – Stakeholder Engagement Plan

- WMP - Waste Management Plan (for construction waste management and reduction)

- CMP – Construction Management Plan resp. Schedule

- Health & Safety Plan incl. Emergency Preparedness and Response Plan

- others (on demand)

5.6 OHS/ESHS related training to workers

The PU will provide an Induction Training to all its employees and Contractor personnel working on the project before early works start.

This Induction Training shall be conducted for all new employees, also if they join the construction site later during construction activities. The goal of the training is for PU employees and Contractor personnel (including sub-contractors) to understand:

- The mitigation measures included in this ESMP and how it will be implemented on site including responsibilities;
- The sensitivities of the area (if any) in which the Project will be constructed and operated;
- Occupational Health and Safety/ ESHS rules at the construction site (e.g. personal protective equipment, rules of conduct, first aid);
- The Project's Grievance Mechanism and the basic worker's rights
- How to deal with enquiries/ questions/ grievances by the public/ local stakeholders;
- Interaction rules with the people living close to the construction site (Code of Conduct) and how to deal with unauthorised visitors to the site;
- How to deal with unforeseen incidents/ emergency situations;
- The roles and responsibilities within the PU, the Contractors, sub-Contractors and workers with respect to environmental and social issues;

The PU keeps records of the training sessions. The training will be repeated as needed during the construction activities.

After completing the Induction Training, refresher trainings may be needed depending on the duration of the construction phase. **It is in the responsibility of the PU and the Contractor to prepare a detailed training plan, especially for the construction workers**.

ANNEX 2: Stakeholder Engagement Plan for Project

See the following separate document.

Annex

Support Programme to vocational education and training in the Western Balkan 6 Economies

Document title

Annex 2 – Stakeholder Engagement Plan for ESMP - Gradiska

Document date

May 2023

Regional Challenge Fund

In cooperation with:

CES clean energy solutions GesmbH
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Abbreviations

ESS	Environmental and Social Standards
GM	Grievance Mechanism
IC	Implementation Consultant for Project Unit
ILO	International Labour Organisation
KfW	KfW Bankengruppe
NGO	Non-Governmental Organization
PE	Public Enterprise
PU	Project Unit
QA	Quality Assurance
RNM	Republic of North Macedonia
SEP	Stakeholder Engagement Plan

1. Introduction

1.1. Preamble

Taking in consideration the World Bank Environmental and Social Standards and ILO Core Labour Standards recognizing the importance of open and transparent engagement between the Project Unit (PU) and project stakeholders as an essential element of good international practice in line with applicable national legislation, the PU/IC has prepared this SEP in order to improve the environmental and social sustainability of the Programme, to increase stakeholder's engagement and to make a significant contribution to successful project design and implementation.

1.2. Objective of the SEP Document

This Stakeholder Engagement Plan (SEP) is developed in order to define strong, constructive and responsive relationships among all parties involved in preparation, implementation and defect notification period of the Project.

1.3. Setup and Update of the SEP Document

In order to establish effective, successful and meaningful relations with the stakeholders, this document is prepared at the beginning of the project development, and it will be used as an integral part of the process of project decision making, assessment, managing as well as monitoring of the social risks and impacts for the whole lifetime of the Project. It will create opportunities for active involvement of all stakeholders in a timely manner and will provide possibilities for all stakeholders to express their opinions and concerns that may influence Project decisions.

This site-specific SEP is prepared as a living document and will be updated on a regular basis to reflect the Project progress.

An update of the SEP will be carried out during all Project phases. It highlights the relevant sub-project stakeholders, ensure timely disclosure of the information for the public hearing/consultation events, if required so, and will introduce the mechanism of engagement of all stakeholders.

This document is meant to be a template, grey marked fields should be completed by the IC.

2. Standards and legal requirements relevant to stakeholder engagement

2.1. National legislative frameworks

The country of implementation is: Bosnia and Herzegovina

Depending on the applicable national legislative framework, the following legal norms and conventions are deemed important for this SEF:

Table 1: Overview on applicable legislative framework

Topic / International convention	National law / Ratification
Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters. (Not signed by Kosovo)	Yes, BiH has signed the convention on June 25, 1998, and ratified it on November 17, 2004. As a party to the convention, BiH is obligated to ensure public access to environmental information, public participation in decision-making processes related to the environment, and access to justice in environmental matters.
Free Access to Information of Public Character Freedom of access to information, freedom of reception and transmission of information, right to a response in the media and right of correction in the media (Law or Constitutional provision)	**Zakon o slobodi pristupa informacijama** u Federaciji Bosne I Hercegovine; (''Službene novine Federacije BiH'', broj 32/2001, 48/11); ЗАКОН О СЛОБОДИ ПРИСТУПА ИНФОРМАЦИЈАМА; Број: 01-572/01 Датум; 02.05.2001. год.
Obligation of authorized administration/ institution/ organizations to inform the public on the environmental status, environmental quality and emission, warning measures, and pollution	Bosnia and Herzegovina has the obligation of authorized administration/institutions/organizations to inform the public on the environmental status, environmental quality and emission, warning measures, and pollution. This obligation is regulated under the Law on Environmental Protection (**Zakon o zaštiti okoliša**) adopted in 2003. Article 5 of this law provides that the competent authorities, including the entity and cantonal ministries responsible for the environment, are responsible for informing the public about the environmental situation, including the quality of air, water, and soil, as well as the levels of noise, radiation, and other pollutants. These authorities are required to make available to the public information on the state of the environment, environmental protection programs and plans, and any measures taken to prevent, reduce, or control pollution. Additionally, Article 35 of the same law stipulates that in the event of an environmental emergency, the competent authorities must inform the public about the nature and extent of the danger, the measures taken to eliminate or mitigate the risk, and any other information

	necessary to protect public health and the environment. Therefore, the Law on Environmental Protection in Bosnia and Herzegovina imposes a clear obligation on competent authorities to inform the public about the environmental status, environmental quality and emission, warning measures, and pollution, in order to ensure transparency, accountability, and public participation in decision-making processes related to the environment.
Citizen's Complaints and Suggestions: definition of proceedings if submitted in verbal or written form by any natural or legal person to the public institutions on national and local level.	Yes, there is a law in Bosnia and Herzegovina that defines the proceedings for citizens' complaints and suggestions on environmental issues. The Law on Free Access to Information of Public Character (**Zakon o slobodnom pristupu informacijama javnog karaktera**) regulates the procedures for submitting complaints and suggestions in written form to public institutions at the national and local levels. According to Article 16 of this law, any natural or legal person who believes that their rights have been violated or that they have not been able to exercise their rights under this law may file a complaint to the competent authority responsible for handling such complaints. The complaint must be submitted in writing and must include the name and address of the complainant, a description of the alleged violation, and any evidence or documentation to support the complaint. The competent authority must acknowledge receipt of the complaint within 15 days and must provide a written response to the complainant within 30 days. If the competent authority fails to respond or if the complainant is not satisfied with the response, the complainant may file an appeal to the next higher authority or to the courts. In addition to complaints, the Law on Free Access to Information of Public Character also provides for the submission of suggestions and proposals related to the implementation of this law. Any natural or legal person may submit suggestions or proposals to the competent authority responsible for the implementation of the law, and the competent authority must consider and respond

	to such suggestions or proposals within a reasonable time.
Ombudsman Office resp. Protection of constitutional and legal rights of citizens and all other persons infringed by acts, actions and omissions by the state administration or other public authorities	Human Rights Ombudsmen, Str Akademika Jovana Sutritke br.13, 78000 Banja Luka Tel/Faks: +387 51 303 992 e-mail: bl.ombudsmen@ombudsmen.gov.ba Website: https://www.ombudsmen.gov.ba

2.2. SEP procedure and phases

This SEP therefore identifies potential environment and social impacts accompanied with proposed mitigation measures.

Stakeholder engagement process can be divided in the following phases

	Phase	Period foreseen
1	Stakeholder identification and analysis; stakeholder engagement planning;	…. Before Procurement of Works
2	Establishing of Project website	…. After Project Design is finished and timeline is planned/defined
3	Regular disclosure of information;	…. Before and during construction works
4	Regular consultation and participation meetings;	…. Before and during construction works, and by supervising agency/provided
5	Reporting to relevant stakeholders	…. Upon agreement with stakeholders
6	Defining/Setup of the grievance mechanism	…. Before construction starts!
7	Implementation of the grievance mechanism	…. During construction works

3. Identification of the Project Stakeholders

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

3.1. Stakeholder groups and interested parties

Project stakeholders shall be identified in a first phase to address the consultation and engagement requirements. These stakeholders need to be regularly informed about the Project activities and consulted throughout the entire Project cycle.

Figure 1: Stakeholders' mapping for typical VTI projects

3.1.1. Affected Parties and Vulnerable groups

Project-affected parties include persons, groups, households, local communities and other entities within the anticipated Project Area of Influence most likely to observe/perceive changes from environmental and social impacts of the Project and thus are affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. This category of primary stakeholders includes those who are directly affected, either actually or potentially, by the Project and/or have been identified as most susceptible to changes associated with the Project. Typically this group comprises **VTI building occupants / users (students, teachers, other staff), residents or employees in close vicinity to reconstruction works,**

The following checklist supports the PU to identify directly affected parties.

Table 2: Checklist to define affected parties / PAP

#	Parameter	Answer
1	Is the affected subject a person, member of household, group or local community?	**No, most likely no potential risk** to students, teachers and other staff, nor to surrounded inhabitants
1a	Which type?	….
2	Does the affected subject permanently or regularly resides / lives / works / has rights inside the Project Area of Influence	No
2a	Where?	…
2b	How often ? (Permanently, hourly, daily, etc.)	…
2c	How long per stay?	…
2d	Reason for stay?	…
3a	Is the change actual/real or potential?	No
3b	Is the project impact perceivable / observable for affected subject	No
3c	Does the affected subject observe or perceive changes caused by the project?	No
4	Which sphere of life will/does the project change?	… physical environment,

5	How long will the impact/change be present?	… temporarily during works
6	How can the affected subject cope with the change	… very good / no impact
7	Was the affected subject prior to project affected by other hardnesses or adverse impacts, e.g.	No
7b	Type of hardness	N/a
7c	Further explanation to hardness / adverse impact	…
7d	Is the affected subject, member of vulnerable group	No

In case that a project affected person has been identified (Questions 1-6), it is important to check its membership in a vulnerable group. If yes, those PAP will need more attention and more support in consultation process than normal PAP.

4. Baseline of Project Stakeholders and level of involvement

Considering the specifics of the Project location and the scope of works, a number key stakeholder groups have been assessed and their involvement roles (primary role/secondary role) have been summarized in the table below.

More detailed information on key stakeholders is presented in the table below.

Table 3: Summary on key potential stakeholders

Stakeholder		Primary	Secondary	Applicable (checkbox)
Project bodies	WB6CIF	Project management and coordination		YES
	VTI management	Support and close cooperation in all phases of the Project		YES

Stakeholder		Primary	Secondary	Applicable (checkbox)
National Government or Independent Bodies	Ministry / State Agency / State Inspectorate		Enforcing national legislation related to environment and construction sector	YES
	State Labour Inspectorate		Enforcing national legislation related to labour relations	O
	Works H&S Inspectorate	Involvement in OH&S		O
	Ombudsman (if any)		Reacts on complaints submitted directly to Ombudsman office	O
Local authorities	Municipalities)	Adoption of relevant technical documents for implementation of the Project; providing necessary permits;	Enforcing local/municipal development	YES
	Public Utilities	Providing conditions for work and access to the utilities under their competence for implementation of the Project;		YES
Local Community	Staff and students using the VTI's	Support and continual provision of opinion	YES	O
	Affected vulnerable groups	Vulnerable groups such as staff/students/ current/potential users of the VTI's services,		YES
	Student councils	Support and continual provision of opinion		O
	Local residents and businesses within the Project area	Individuals, households, local communities and businesses located close to the VTI's which will be affected by Project activities (access restrictions and/or disturbances due to construction works)		O
	Contractors and Subcontractors on the Project	Directly involved party with responsibilities to implement Technical Specifications including good construction		YES

Stakeholder		Primary	Secondary	Applicable (checkbox)
		practices, environmental protection, OH&S, community safety, preventing incidents and accidents, respect procedure for communication with stakeholders identified in this plan, training etc.		
	Suppliers of goods and services	Directly involved party with responsibilities to fulfil Quality Assurance (QA) standards from Technical Specifications including environmental protection, OH&S and community safety		O
Other interested stakeholders	Media		Presenting and informing about the Project activities, progress, delays through social media, radio, TV channels, newspapers etc.	YES
	Workers Union /Trade Unions		Safeguarding and enforcement of workers' rights in line with national legislation and international best practices	O
	General Public, NGO's, Academic and scientific community		Individuals, group of individuals	YES

4.1. Baseline Data on Affected Parties

It is important to understand the Project impacts and to identify if any of them might have influence on disadvantaged or vulnerable individuals or groups of individuals (staff and students) that would silently witness and suffering the impacts of the project.

Primary stakeholders might be identified among the vulnerable individuals (e.g. families with low social standard – unemployed parents with students, single parent families, people with disabilities, REA people, people with issues in gender identity, sexual orientation, religion, ethnicity, etc.) or families

whose children are gravitating toward the VTI's in the bigger cities from other municipalities and surrounding settlements in the region to receive education.

As precited in the SEP framework document this site-specific SEP is prepared to ensure necessary analysis for each project separately regarding the representation of vulnerable groups, student councils, NGOs, medical professionals working with students and, in particular, with students with disabilities, and then to apply appropriate measures according to the needs of the vulnerable people in each VTI and to get their opinion on the Project activities.

The summary on identified key Project's stakeholders is presented in the table below.

Table 4: Template List of PAP and vulnerable groups (Example)

#	PAP/Group description	Affectedness	Vulnerable	Number of members	Name of Speaker	Contact (Phone, e-Mail)
1	VTI Students (aged 14-17)	Daily occupants of site	Approximately 10 %	352	Sanja Šatara, president of the student council	sanja.satara@skolers.org
2	VTI Students (aged >17)	Daily occupants of site	Approximately 10 %	104	Sanja Šatara, president of the student council	sanja.satara@skolers.org
3	VTI Educational and Administrative Staff	Daily occupants of site	/	72	Vlado Tomić, director	ss16@skolers.org
4	Other building occupants (cafeteria, shops, organizations, etc)	Daily occupants of site	/	/	Mario Balać, Cafeteria owner	Cafeteria near the building, but closed! Contact number: +38766938563
5	Residents in direct vicinity	Direct neighbors	…	/	/	/
6	Disabled or aged residents in direct vicinity	Direct neighbors	Y (disabled, aged)	/	/	/
7	Homeless or nomadic people in direct vicinity	Direct neighbors	Y (homeless)	/	/	/
8	Children in direct vicinity (playground, school, kindergarten)	Direct neighbors, road users	Y (children)	/	/	/
9	…	…	…	…	…	…

Affected parties could be the following groups:

VTI Building occupants such as students, educational and administrative personnel are directly affected by rehabilitating works. Students and teachers using the VTI under partial reconstruction will have to pass the construction sites daily in case works will conducted during a study season. Thus they will be the most affected and might be partially exposed to risks. They will be impacted through noise or dust and/or building access barriers, through temporary building closings etc.

Businesses or any organizations located inside or next the area adherent to the VTI's might also be affected.

The buildings to be rehabilitated might be located within the highly populated urban areas, i.e. cities with Citizens/Communities (multi-storey buildings and dwelling houses) living in the area neighbouring the VTI's and which are considered to be potential direct recipients of project impacts.

Staff of project contractors and sub-contractors are also deemed in their Operational Health & Safety and the temporary workplace in the VTI's during project implementation considered to be affected parties.

Table 5: Involvement level for of affected parties

Stakeholder	Affection level (Primary / Secondary)	Location	Level of involvement
Students	primarily	In VTI buildings	Direct (especially if construction works will start during a study season, but not affected if during summer break July/August)
VTI educational staff	primarily	In VTI buildings	Direct (especially if construction works will start during a study season)

4.2. Baseline Data on Interested Parties

Individuals/groups/entities that may not experience direct impacts from the Project, but who consider or perceive their interests as being affected by the Project and/or who could influence the Project and the process of its implementation in an indirect way, are included into this category.

This category of secondary stakeholders includes various authorities and elected officials, civil society groups and media representatives.

Interested parties or **Secondary Stakeholders** are considered as individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, other civil society organizations, and cultural groups.

Selected governmental authorities e.g. related to VTI's supervision, construction issues, as well as works inspectorate might have stake in the project. Those might be further specified.

Businesses of the city or country in general. Such businesses are viewed as interested parties as they may potentially benefit from the Project as part of procurement activities. At present, there is no clarity on the actual list of businesses that are to be involved into the Project construction activities or might be

affected due to reconstruction works. However, such local companies/businesses may play a role in the Project or may need a support during implementation phase.

Civil society organizations, which might be interested to get information on Project activities.

NGOs, press and mass media. The variety of mass media and NGOs is diversified. As the project will be implemented at the supra-state level through the WB6 CIF, all various media and press bodies are considered as an interested party.

Table 6: Template List of interested secondary stakeholders

#	PAP/Group description	Affectedness	Place	Number of members	Name of Speaker	Contact (Phone, e-Mail)
1	Ministry of Education	Secondary	Banja Luka	10-15	Minister: Željka Stojičić	Tel: 051/ 338 461

Table 7: Involvement level for of interested parties

Stakeholder	Affection level (Primary / Secondary)	Location	Level of involvement
Private businesses: TIKT Manufaktura doo, PMP Jelsingrad, Laguna Sped, Tapetarija Matic, Tapetarija Nikolic, Reflex doo	Secondarily (interested)	Not Bordering	Partnering in Project, but not involved in construction works
Municipality of Gradiska and their development agency	Secondarily (interested)	Not Bordering	Associated involvement

5. Approach to Stakeholder Engagement and Information disclosure

To adequately respond to needs presented by different groups, communication and information fluctuation have been designed for all identified stakeholders in accordance with their possibilities and capacities.

5.1. Purpose and Responsibility for SEP Implementation

The Employer recognizes the importance of the engagement with relevant institutions and bodies, local authorities and communities and other involved stakeholders for the success of each project.

The stakeholder engagement process will be used to obtain opinions, comments and suggestions for the development of each project, which may bring ideas for improvement during the Project design

phase, as well in later stages of the Project and enhance the benefits for the students and staff currently using the VTI's and who will use it in the future.

To ensure an adequate and timely consultation process with the stakeholders, the Project Unit (PU) supported by the Implementation Consultant (IC), is responsible for the implementation of the SEP, including communication with the local authorities and all relevant stakeholders.

Furthermore, all Contractors in charge of carrying out specific Project activities will be required to implement the SEP. The provisions of SEP implementation, including the grievance mechanism, entrusted to contractors will be provided as an integral part of the tender documentation and contracts signed with each Contractor company.

5.2. Stakeholder engagement instruments

Stakeholder engagement practice in Western Balkan public entities is typically arranged in accordance with national legislation as stipulated in previous sections.

For the needs of this Programme the following entities were identified as the primary grievance addressing entities:

Table 8: Leading entities for stakeholder engagement and grievance

Entity	Address	Name	e-Mail / Phone	Website
IC: PIU of RCF	…	…	info@@rcf-wb6.org	https://rcf-wb6.org/
VTI Director's Office	Kosovske Djevojke 18, Gradiška 78400	Mr. Vlado Tomic	ss16@skolers.org 051 813-711	www.tehnickagradiska.com
Municipalities and city councils	Vidovdanska 1a, Gradiška	Mr. Zoran Adžić	gradonacelnik@gradgradiska.com 051 810-300; 051 810 353	www.gradgradiska.com
~~Media:~~	~~…~~	~~…~~	~~..~~	~~…~~

Public announcements communicated to the media (local radio and television stations, daily newspapers, social media etc.).

5.3. Formal request for information

In case the PU receives a formal request for access to information, it will apply the provisions and procedures set out by the national Law on Free Access to Information of Public Character described above in this document.

All applications/requests for access to documents shall be addressed to the PU, set up in accordance with the Law. In case this Office does not have the information requested or access to such information, it is required, within 5 calendar days of receipt, to forward the request to the competent organization, and notify the requester about the undertaken measure.

Public authorities are required to provide a response to the applicant within 30 days, either granting access to the requested documents or notifying the applicant of the reasons for total or partial refusal.

In case of total or partial refusal, the applicant is entitled, within 15 calendar days, to submit a new application for review of the issue.

In case of dissatisfaction with the decision of the public authority, the citizens are entitled to address a national Ombudsman, which is an independent authority with a designated official responsible for providing free assistance to citizens in gaining access to the necessary documents being refused to them. (Templates for Complaint can be found on the Ombudsman web page).

Table 9: Ombudsman contact

Country	Address of Ombudsman institution
Bosnia and Herzegovina	Dr. Nevenko Vranješ, Ombudsperson of BiH Dr. Jasminka Džumhur, Ombudsman BiH Nives Jukić, Ombudsperson of BaH Banja Luka / Sjedište Institucije: Akademika Jovana Surutke br.13 78000 Banja Luka,Bosna i Hercegovina Tel/Fax: +387 51 303 992 bl.ombudsmen@ombudsmen.gov.ba https://www.ombudsmen.gov.ba/Default.aspx?id=0&lang=BS

Please obtain the relevant contact from https://ennhri.org/our-members or from https://equineteurope.org/

6. Engagement Plan

Principles that will be used in developing stakeholder engagement methods derive from the KfW 's Sustainability Guideline, KfW 's Declaration of Human Rights, as well as ESS 10 of the WB Environmental and Social Standard. They include the following:

- Engagement will aim at providing local communities that are directly affected by the Project and interested stakeholders with access to timely, relevant, understandable and accessible information,

in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation. The information materials will be released in BHS and English languages.

- Stakeholder engagement will involve the following elements: stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders.
- The requirements of applicable national law with respect to public information and grievance consideration will be met.
- The disclosure period starts before the project implementation.

The PU must carry out public consultations and information dissemination that will reflect main issues of relevance to the Project. All interested stakeholders must be timely informed about the Project's scope and contacts for further information inquiries, as well as about the availability of Project documentation, through the websites of the PU, as well as through announcements in the local daily media (newspapers, TV or radio, social media) and/or personal meetings.

It must be safeguarded that the stakeholder engagement standard techniques are going to take place before, during and after the implementation of the Project.

Collecting of information and building of relationship with the stakeholders must be implemented through different engagement techniques that will provide a safe communication in line with the restriction measures recommended in the real time of the event. Holding meetings through some online platform is highly recommended to include the stakeholders (local authorities, Public Enterprises, NGO's etc.).

The proposed methods for stakeholder engagement activities are outlined in the table below.

Table 10: Proposed methods for stakeholder engagement activities

Method	Objective	Tools	Checkmark	Comment
Printed public Information material	Delivery of project related information	Leaflets and factsheets	O	...
Use of publicly available buildings and venues	Reaching broader public with Project-related information	Information stands, Project information boards	O	...
Media (TV, newspapers, e-media)	Reaching broader public with Project-related information	Social advertisements, press releases, interviews	**YES**	...
Website of the MoES and City Council in the relevant municipalities	Instant delivery of Project related information	Public information channels , Project page and regular updates of the Project progress	O	...
Response sheets	Receiving stakeholders' feedback	Grievance forms to get feedback from stakeholders to be placed in information stands, webpages. They will be made available during consultation meetings. Separately developed Internal Grievance Form for Contractor and Sub-contractor's personnel.	O	...

Consultation meetings	Dissemination of the Project information	Consultation meetings with effected parties	O	…
Awareness raising on safety management of asbestos containing materials and other hazardous materials	Dissemination of information on health and environmental risks associated with asbestos materials and measures for their elimination	Awareness raising strategy on asbestos containing materials as well as other possible hazardous materials present on sites. Info sheets, webpage	O	…

In addition, households and businesses that might be directly affected by temporary occupation of land will be individually visited and/or informed in writing about the impacts of the Project on their property, particularly the precise access roads to the dormitory property and the duration of such works.

Residents, business, education institutions in the Project area directly affected by any potential road closures and disruptions in access to their properties will be informed in written form about the duration, timing and extent of planned works. The solution if any will be planned jointly with the affected stakeholder prior closure/disruption.

If necessary, separate meetings will be held to ensure that stakeholder engagement is gender responsive.

- Local community consultative meetings for engaging individuals, households and businesses affected by the construction activities into the consultation process and will be organized on a need basis in dormitories premises.
- Individual consultative meetings for engaging individual stakeholder groups and vulnerable groups regarding specific issues and will be organized on a need basis. This type of meetings can be initiated by the PU, the IC or Contractor or by any identified stakeholder groups.

7. Grievance Management scheme

KfW ‘s Sustainable Guidelines, World Bank Group ESS, and other similar international standards require the establishment and maintenance of a grievance mechanism open to all stakeholders. This mechanism will be established at early stages of the Programme and maintained throughout the programme’s lifecycle.

The grievance mechanism is meant to provide a fair and prompt registration and redress system for any complaint linked to the Project. One of its key objectives is to avoid resorting to the judiciary and to seek amicable resolution in as many situations as possible, thereby safeguarding both complainants’ and PU’s interests and limiting risks unavoidably associated to legal action.

The PU will ensure establishment and maintaining of efficient grievance management and redress in accordance with the applicable law and KfW requirements.

7.1. Implementation Arrangements for Grievance Process

The implementation of the SEP will be performed by the PU. The PU Director will be supported by the IC.

The PU/IC will receive Grievances directly from stakeholders, through Contractors and authorities and will be engaged in resolving of the issues addressed in them in coordination with the Contractors or PU depending on their complexity.

The Contractor/s engaged to implement Project activities will be required to implement all relevant provisions from the SEP. The Contractor will inform the PU and IC about each grievance raised (verbal or written), provide all the details about action taken or consult the IC on the manner of resolving the issue that is raised by it.

The grievance mechanism requirements will be an integral part of the tender specification documentation and the Contract/s signed with the Contractors.

The process of grievance mechanism revision is summarized on the scheme below.

Figure 2: Grievance process flowchart

7.2. External Grievances

It is proposed that for the needs of the Project activities a separate grievance mechanism will be established.

Table 11: Checklist for external grievances

Need	Check Mark	Comment
Specific Grievance Form in all local languages developed (see Annex 2: Grievance Form) with specify contact details for reply	YES	…
Grievance boxes installed in buildings under rehabilitation, allowing for anonymity of sender.	YES	…
Brief description of all opportunities for lodging a grievance will be provided through project leaflets. Additionally, the leaflet will be accompanied with an external grievance form as indicated in Annex 2: Grievance Form.	O	…
The leaflet will be made available to identified Project stakeholders at various venues (e.g., construction site, educational venues and halls, websites etc.)	O	…
The grievances received via the grievance boxes shall be treated in line with the established grievance mechanism.	YES	…

7.3. Internal Grievances (Worker)

The internal grievance mechanism shall be developed by the PU to address the issues related to own personnel. The PU shall ensure that contractors' and subcontractors' workers have an opportunity to lodge their grievances, too.

Table 12: Location of Grievance boxes

Box No-	Building	Level / Room	Privacy ensured	Photo
1	VTI building	Hallway on the ground floor	YES	*Image: example*
…	…	…	…	
Other form of receipt	Type: e-Mail, SMS, website, P.O. Box	Address	Yes / no	-

Grievances received by the contractor in any other form shall be also considered. The grievances of contractors' workers received via the grievance boxes shall be collected by the PU regularly and treated/analysed by responsible parties in line with the established internal grievance mechanism.

After the grievance is analysed and a decision is made upon the potential resolution, the PU will require the relevant contractor to resolve the grievance.

7.4. Grievance Monitoring and Reporting

The PU conducts constant grievances analysis, monitoring and reporting. The reporting will include the following indicators:

- number of all received queries and grievances opened in the quarter;
- form of grievances (oral, written and electronic);
- comparison of the appeals and grievances statistics against the previous year numbers;
- categorization of the queries and grievances.

The PU will include the results of grievance monitoring in an Annual Environmental and Social Report, if required. See next section.

The above-mentioned indicators could be derived from the GM system that comprise at least:

Table 13: Overview on Workers Grievances

#	Date of Grievance	General Area	Description of Grievance	Follow-up	Status	Complainant Type	Contact of Compl.
1	<dd.mm.yy> hh:mm	…	…	<information on how the issues raised during the meetings were taken into consideration by the PU, including the implemented corrective measures meant to address the grievances>	Opened/ resolved/ closed	…	

8. Monitoring and Reporting

The Project Unit will be responsible for monitoring all project related Stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to IC (RC`s->PIU Lead) who then report to KfW.

Monitoring and reporting of the Stakeholder engagement process is important for evaluation of the capacity and proper activities taken during project execution.

The results of the stakeholder engagement process will be included in the regular monitoring reports over the project lifetime, to be prepared by the IC in line with KfW templates.

The reports on stakeholder engagement actions will be prepared on agreed time schedule basis and will be made publicly available on the website of the PU.

The following table gives type and frequency of such reports.

Table 14: Schedule of Foreseen Reports

#	Name of Report	Frequency	(First) Date of Issuance
1	Half-yearly & yearly Environmental and Social Reports	½- yearly & yearly	Tbd.
2	…	<regular>	dd.mm.yyyy

Stakeholder Engagement monitoring reports should include a minimum of information, as depicted in the following table.

Table 15: SEP Activities

#	Date of Activity	Type of Activity	Description	Follow-up	Participating organization
1	<dd.mm.yy> hh:mm – hh:mm	Consultation / Information	<Issues and concerns raised during consultative meetings>	<information on how the issues raised during the meetings were taken into consideration by the PU, including the implemented corrective measures meant to address the grievances>	…
…					

Community grievance mechanism reports should be a synopsis that bases on information as depicted in the following table.

Table 16: Overview on Community Grievances

#	Date of Grievance	General Area	Description of Grievance	Follow-up	Status	Complainant Type	Contact of Compl.
1	<dd.mm.yy> hh:mm	…	…	<information on how the issues raised during the meetings were taken into consideration by the PU, including the implemented corrective measures meant to address the grievances>	Opened/ resolved/ closed	…	
…							

Annex 1: Information Disclosure and Stakeholder Engagement Plan – Example to be revised by IC

Stakeholders	Engagement methods	Tools and Materials	Responsible person	Timeline
PU / IC	• Consultation meetings[1]; • Web page information disclosure; • Use of publicly available buildings and venues;	• Consultation meetings with affected parties; • Project page and regular updates of the Project progress; • Information stands;	Director of VTI: Vlado Tomic	Meetings/Web page: Prior to design stage; Info on building during construction works
Building occupants and utility object users	• Consultation meetings; • ~~Printed public Information material;~~ • Response sheets;	• Consultation meetings with effected parties; • ~~Leaflets and factsheets;~~ • Grievance forms to get feedback from stakeholders to be placed in information stands, webpage. They will be made available during consultation meetings;	Director of VTI: Vlado Tomic	Prior to start of construction
VTI management team	• Consultation meetings; • ~~Printed public Information material~~; • Use of publicly available buildings and venues;	• Consultation meetings with effected parties; • Interviews; • ~~Leaflets and factsheets;~~ • Information stands;	Director of VTI: Vlado Tomic	Prior to start of construction

[1] In line with the restriction measures recommended by the relevant authority

Stakeholders	Engagement methods	Tools and Materials	Responsible person	Timeline
	• Awareness raising on safety management of asbestos containing materials;	• Awareness raising strategy on asbestos containing materials. Info sheets, webpage;		
Citizens and communities	• ~~Printed public Information material;~~ • Response sheets;	• ~~Leaflets and factsheets;~~ • Grievance forms to get feedback from stakeholders to be placed in information stands, webpage. They will be made available during consultation meetings;	Director of VTI: Vlado Tomic	Prior to start of construction
~~Businesses or any organizations located in a close vicinity~~			To be nominated	Prior to start of construction
Project contractors and sub-contractors	• Consultation meetings; • ~~Printed public Information material;~~ • Awareness raising on safety management of asbestos containing materials; • Response sheets;	• Consultation meetings with affected parties; • ~~Leaflets and factsheets;~~ • Awareness raising strategy on asbestos containing materials. Info sheets, webpage; • Grievance forms to get feedback from stakeholders to be placed in information stands, webpage. They will be made available during consultation meetings;	Director of VTI: Vlado Tomic	Prior to start of construction
			Supervision of works provider	Prior to start of construction
			To be nominated	Prior to start of construction
~~NGOs~~, press and mass media	• Web page information disclosure; • ~~Printed public Information material;~~ •	• Project page and regular updates of the Project progress; • ~~Leaflets and factsheets;~~ • Grievance forms to get feedback from stakeholders to be placed in information stands,	Director of VTI: Vlado Tomic	Prior and during construction

Stakeholders	Engagement methods	Tools and Materials	Responsible person	Timeline
		webpage. They will be made available during consultation meetings;		

Annex 2: Grievance Form (English & BHS tbd.)

Reference number:	…
Full name (Anonymous) /	…
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 of communication	☐ …….. ☐ **English (if possible)**

Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Date of Incident / Grievance	
	☐ **One-time incident/grievance (date _____)** ☐ **Happened more than once (how many times? _____)** ☐ **On-going (currently experiencing problem) _____)**

What would you like to see happen?	