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WB30-ALB-TRA-01

**“Mediterranean Corridor: Murriqan –
Lezhë Route Highway Section, Detailed
Design, ESIA update, Tender
Documents”:**

Stakeholder Engagement Plan

Western Balkans Investment Framework
Infrastructure Project Facility
Technical Assistance 12 (IPF 12)
AA-011076-003



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Abbreviations

Abbreviation	Meaning
AIC	Adriatic Ionian Corridor
ARA	Albanian Road Authority
ARA	Albanian Road Authority
CLO	Community Liaison Office
CSO	Civil Society Organization
DCM	Decision of the Council of Ministers
E&S	Environment and Social
ESR	Environmental and Social Requirements
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EIA	Environmental Impact Assessment
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environment and Social Management Plan
ESP	Environment and Social Policy
FS	Feasibility Study
IC	Interchange
IPA	Instrument for Pre-accession
IPAM	EBRD's Independent Project Accountability Mechanism
IPF	Infrastructure Project Facility
IPF5	Infrastructure Project Facility -Technical Assistance 5, 5th contract
IPF10	Infrastructure Project Facility -Technical Assistance10, 10th (current) contract
MIE	Ministry of Infrastructure and Energy
MoTE	Ministry of Tourism and Environment
NEA	National Environment Agency
NGO	Nongovernmental Organization
NIC	National Investment Committee
NTS	Non-Technical Summary
PAI	Project Area of Influence
PAP	Project Affected People
PIU	Project Implementation Unit
RAPA	Regional Administration for Protected Areas

Abbreviation	Meaning
RF	Resettlement Framework
RrTPRr-2	Albanian Road Design Manual-2
SC	Steering Committee
SE	Stakeholder Engagement
SEP	Stakeholder Engagement Plan
SPC	Strategic Planning Committee
TEM	Trans European Motorway
TEN-T	Trans European Network - Transport
WBIF	Western Balkans Investment Framework

STAKEHOLDER ENGAGEMENT PLAN

NAME OF SUBPROJECT	Mediterranean Corridor: Murriqan – Lezhë Route Highway Section, Detailed Design, ESIA update, Tender Documents
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1 Introduction

1.1 Project Context

The European Bank of Reconstruction and Development (EBRD) is considering the provision of finance to the Ministry of Infrastructure and Energy (MIE) (Beneficiary) of Republic of Albania, for the construction of a Motorway section Murriqan - Lezhë ("The Project").

Adriatic-Ionian Corridor (AIC) is part of the Western Balkans Core Road Network as well as part of the indicative extension of the TEN-T Network to the Western Balkans region, which was officially adopted in 2016 (EC Regulation 2016/758 amending Regulation No. 1315/2013). More specifically, the AIC will be part of the Mediterranean Road Core Network Corridor, together with Corridor Vc in Bosnia and Herzegovina.

The motorway will connect Central Europe and Northern Italy with the Ionian Peninsula via Slovenia, Croatia, Bosnia & Herzegovina, Montenegro, Albania and Greece. The Corridor is planned to stretch along the eastern shore of the Adriatic and Ionian seas, spanning the west coast of the Balkan Peninsula (from Trieste in Italy to Kalamata in Greece).

The whole AIC crosses 6 of the largest districts of Albania: Shkodër, Lezhë, Durrës, Tiranë, Fier and Gjirokastër. The most recent alignment for the AIC motorway is the one prepared (and approved) at a Preliminary stage, in the context of the subproject WB24-ALB-TRA-01 (WBIF - IPF 10, 2024). The Murriqan/Sukobin - Lezhë (Balldren) is the first sub-section of the AIC motorway in Albania, connecting Montenegrin/Albanian border with Lezhë (Balldren).



Figure 1. Adriatic-Ionian Road Corridor (AIC). Source: Wikipedia

This section of AIC Corridor located in northwest of Albania generally lies in a flat terrain and cultivated area. It crosses partially the protected area of Buna River, where a crossing allowing river navigation will be foreseen. The future alignment, with adequate geometric standards, will improve the mobility in the whole region that

is influenced by this construction, in particular the North-South traffic flows. This will also create an extremely positive impact on the whole transport network.

The typical cross section of Murriqan-Balldren section is a typical 4 lane, motorway category A cross section, according to Albanian Road Design Manual (RrTPRr-2) and TEM Standards and Recommended Practice (2002). This is a divided motorway (dual carriage way) with total length of approx. 40.3km, starting from the Albania – Montenegro crossing border in Murriqan (Ch. 0+000) and ending to the north of Lezhe (Balldren, approx. Ch. 40+300). In addition to the motorway, it is expected that approx. 26km of local (side/lateral and vertical) roads needs to be reinstated, so that the dense local (mainly agricultural) road network is restored, and access is provided to all aggrieved properties.

Four interchanges are envisaged at the new motorway. The motorway is designed for speed VD = 120km/h.

The area of the project alignment crosses three adjacent municipalities:

- Shkoder Municipality,
- Vau i Dejës Municipality and
- Lezhe Municipality.

The **overall objective** of this Project is to enhance Albania's development of an efficient transport system, integrated into the regional and European road corridor networks, which should contribute to local and regional economic growth and development.

The **specific objectives** are to support the construction of the Murriqan – Lezhë Highway section of the Adriatic – Ionian Corridor. The Project is expected to generate the following measurable benefits:

- Socio-economic: Improved connectivity and accessibility to/from the region, reduction of traffic congestion, reduction of travel times, creating better opportunities for regional development, creating of better conditions for investing in the economy and increased productivity;
- Environmental issues: Reduction of noise levels and exhaust emissions in the cities of Lezhë and Shkodra;
- Safety concerns: Reduction of traffic accidents and improving road safety along the route.

1.2 Principles and Objectives of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) describes the engagement activities being undertaken for the Project during planning, construction, and operation. It has been prepared as part of the ESIA package for the purposes of the Project.

This SEP was developed by MIE to clearly communicate to all interested and affected parties, which is to be implemented throughout the entire Project cycle. The SEP identifies relevant stakeholders, defines communication channels and plans regarding the construction of the planned motorway.

- Stakeholder engagement for this project is based on the following principles:
- Early and on-going engagement with relevant stakeholders to inform and influence the proposed project development process
- Seeking an appropriate level of feedback at each development stage to achieve an iterative design process by ensuring that comments and concerns received are taken into consideration
- Building of long-term relationships with key stakeholders throughout the different stages of the proposed project to help better understand their views

- Where possible and practicable, ensuring concerns are addressed; and
- Ensuring appropriate statutory consultation is undertaken in compliance with national requirements and best international practice.

The objective of this SEP is to improve and facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for all stakeholders to voice their opinions and concerns that may influence Project decisions.

Other objectives of this SEP are:

- To promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to the project's stakeholders;
- To ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with the Albanian laws, as well as the requirements of EBRD's Environmental and Social Policy (2024).

Given the scale and nature of the Project, EBRD has assigned the Project to Category A under its Environmental and Social Policy 2024.

This SEP refers mainly to the Pre-construction stage and must be updated at least twice: prior to commencement of the Construction phase (upon selection of Contractor and prior to any civil works took place on the site), as well as with commencement of the Operational phase (with expiry of defects liability period and establishing of full authority over the motorway section by the Motorway operator). This SEP can also be updated earlier, as needed.

2 Project Description

2.1 Project Components

The motorway starts at the border crossing of Albania with Montenegro at Murriqan. The end of the project is envisaged at the portals of the new tunnel at the Renci mountain, by which Lezhe will be bypassed from the north. The typical cross section of Murriqan-Balldren section is a typical 4 lane, motorway category A cross section, according to Albanian Road Design Manual (RrTPRr-2) and TEM Standards and Recommended Practice (2002).

This is a divided motorway (dual carriage way) with total length of approx. 40.3km, starting from the Albania – Montenegro crossing border in Murriqan (Ch. 0+000) and ending to the north of Lezhe (Balldren, approx. Ch. 40+300). The proposed alignment for the motorway, first part of the AIC in Albania, is envisaged on a totally new corridor, avoiding interference with the existing National Road network, which is currently serving the traffic in the area (local and through traffic as well).

In addition to the motorway, it is expected that approx. 30km of local (side/lateral and vertical) roads needs to be reinstated, so that the dense local (mainly agricultural) road network is restored, and access is provided to all aggrieved properties.

The motorway is located on a plain terrain, which is characterized by the existence of several and significant water bodies like the Buna River and the Drin River. As a consequence, the motorway will be almost throughout its whole length designed on an embankment. The longitudinal profile of the motorway, i.e. the height of the embankment will be properly designed, so that the pavement is not affected when flooding incidents occur, in particular in the area of the Buna River. At the crossing point with Buna River, a 480 metres long bridge is foreseen to be built.

Five interchanges are envisaged at the new motorway, namely IC-01 Murriqan (approx. Ch. 1+200 close to the border crossing), IC-02 Shkoder (approx. Ch. 9+925 at the intersection with the recently constructed Shkoder – Velipoje road / SH27), IC-03 Vau i Dejes (approx. Ch. 16+365 at the intersection with the SH28 road to Vau i Dejes), IC-04 Gjadër (approx. Ch. 26+830) and IC-05 Lezhe (approx. Ch. 37+850 to the north of Lezhe).

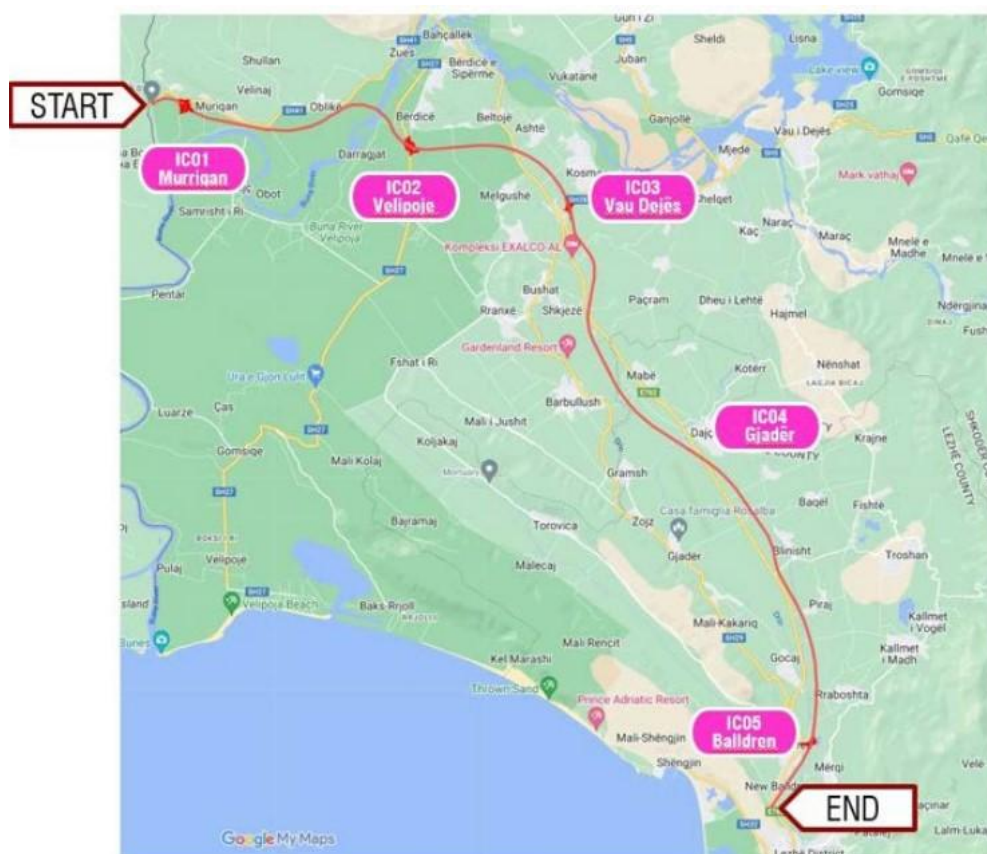


Figure 2. Motorway alignment

The motorway is designed for speed $VD = 120\text{km/h}$.

The existing National Road SH1 is preserved as a secondary road and as an alternative route to the future motorway, playing thus an important role for the integrity of the road network as a whole, not only during the construction of the motorway but also during the operational period of the motorway (e.g. possibility for detouring the traffic whenever required).

Based on the data acquired regarding past flooding incidents in the area, the maximum motorway's footprint, i.e. the maximum width occupied by the motorway between its embankment's toes, will be approx. 50m. i.e. 25m to each side of the motorway central axis.

2.2 Project Area of Influence (PAI)

The project footprint is located across the territories of three municipalities in the Republic of Albania: Shkodër, Vau I Dejes and Lezhë, and two Counties: Shkodra and Lezhë. Municipality Vau I Dejes belongs to the Shkodër County.

The red coloured area on the following map represents the social section of the Project Area of Influence (PAI) and the red line is the motorway. The social section of the Project Area of Influence includes settlements, homes, fields and other properties that will be affected by construction activities (i.e. impeded road access/single access to the property, dust and noise, irrigation channels).

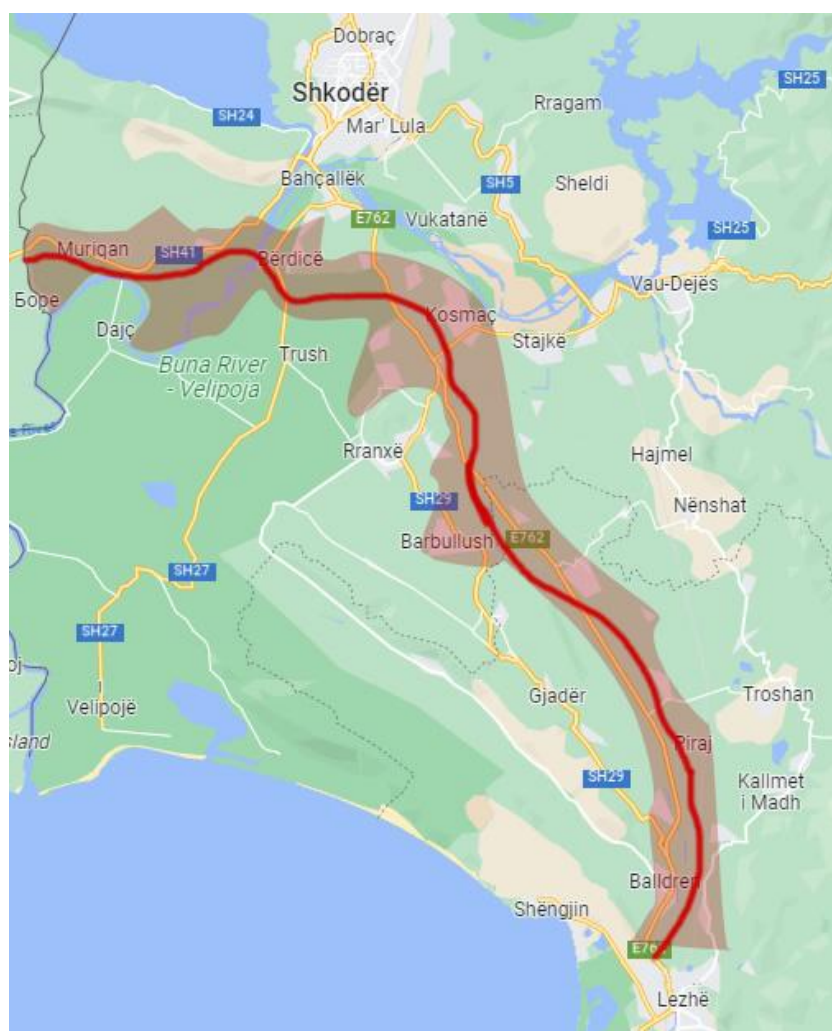


Figure 3. Distribution of settlements in the Project's Area of Influence

At this moment, locations for borrowing materials, workers' and construction camps/bases, temporary disposal locations are unknown, but will be added later if fall outside the identified area.

The following table presents the settlements expected to be affected with the project's activities and these settlements are defining the social section of the Project Area of Influence (PAI).

Table 1: General demographic overview of the affected settlements

Municipality	Administrative Unit	Settlement	Population (Census 2011)	Approximative distance from the motorway (in m)
Shkoder	Ana e Malit	Shtuf	191	750
		Murigan	1229	250
		Obot	672	600
		Oblike	2749	300
	Bërdicë	Mali Hebaj	726	650
		Beltoje	775	800
		Berdice e Madhe	1663	1,100
Vau i Dejes	Bushat	Ashte	999	800
		Kosmac	2332	800
		Meglushe	2533	1,300
		Plezhe	743	50
		Shkjeze	1116	350
		Barbullush	No data	1,400
Lezhe	Dajc	Mabe	1020	850
		Dajc	1677	800
	Blinishte	Kodhel	No data	1,300
	Blinisht	Piraj	558	200
		Blinisht	996	750
	Kallmet	Rraboshte	1700	900
		Merqi	1020	850
	Balldren	Balldren I Ri	1054	50
		Gocaj	No data	750
		Balldren	2465	400

2.3 Project Implementation

Steering Committee for this project has been established on 25.10.2022 (ORDER No. 205, dated 25/10/2022) by the MIE, and it involves representatives from: Ministry of Infrastructure and Energy, Ministry of Finance and Economy, Ministry of Europe and Foreign Affairs (MEFA), Ministry of Tourism and Environment, Albanian Road Authority, European Bank for Reconstruction and Development, European Union Delegation, Lezha municipality, Shkodër municipality.

The **Albanian Road Authority (ARA)** is charged with following up the project in technical and organizational terms. **Albanian Road Authority** is the national road network manager and is responsible for designing and implementing the programmes for planning, funding, construction, reconstruction, maintenance, and protection of the national road network. It is envisaged that ARA will establish a Project Implementation Unit (PIU) for the implementation of this Project.

The EBRD is the Lead IFI of the Project. It will closely monitor the activities and the results of the Project and, together with the Beneficiary, will review the deliverables of the Project and provide no-objection or comment upon them.

The local administration in Shkodra and Lezha Region will be involved especially in issuing the correspondent legal authorizations and permits for the Project.

This Detail Design phase is expected to end 1st quarter of 2027. Shortly after the closure of the Detail Design phase a Contractor will be chosen, and in the 4th quarter of 2027 assignment of works should be concluded. The Construction phase is expected to begin in 2028 and to last 2,5 years. The Motorway section is expected to become functional in 2030.

3 Legal Framework

3.1 Albanian Requirements

Public participation in the environmental protection processes in Republic of Albania is regulated by:

- Territorial and Development Planning
- Convention on Access to Information, Public Participation in Decision-making, and Access to Justice in Environmental Matters (Aarhus Convention)
- Law on the Environmental Impact Assessment and associated by-law documents
- Law on the right to information

The Law 107/2014 on Territorial and Development Planning (amended by Law No 288/2017) regulates consultations and organization of public meetings during the development or relevant urban plans. The Planning Authority notifies the public and interested parties of the location, date and time of each public meeting and makes available the draft planning document, at least 30 days prior to the meeting. The announcement is made through the publication of the information in the register and in two major circulation papers or other media. Comments and suggestions on the draft plan, received during the publication process, are considered in the finalization of the plan.

The Law No. 8672, dated 26.10.2000, "On the Aarhus Convention Ratification on public right to information, to participate in decision-making and to have access to justice in environmental matters". The international agreements ratified by the Republic of Albania, pursuant to the Constitution, occupy a privileged rank at the domestic legal order. An international agreement ratified by law of the parliament prevails over the laws of the country that are incompatible with it, and it is directly applicable, except the case when it is not self-executing and its application requires the adoption of a law. In the field of environment, the major part of the international treaties is not self-executing and require positive measures in order to be properly implemented at the domestic level.

The legal framework for the EIA procedure in Albania is based on Law No. 10440 "On Environmental Impact Assessment", approved on 07.07, 2011 and later amended with Law No. 12/2015 "On some changes to the law No. 10440, dated 07.07.2011, On the Environment Impact Assessment" and Law No. 52/2020 "On some changes on the Law No. 10 448, dated 14.07.2011 "On Environmental Permits" amended. An important legal framework for EIA is also the DCM No. 686, dated 29.07.2015 "On the rules, responsibilities, timelines for the EIA procedure and the transfer procedure of the decision for the environmental declaration" amended and DCM No. 247, date 30.04.2014 "On the determination of rules, requirements and procedures for public information and involvement in the environment decision-making process".

The Law No 119/2014 "On the Right to Information" regulates the right of access to information being produced or held by public sector bodies. The rules contained in this law are designated to ensure the public

access to information, in the framework of assuming the rights and freedoms of the individual in practice, as well as establishing views on the state and society situation. This law aims also at encouraging integrity, transparency and accountability of the public sector bodies.

3.2 International Requirements

EBRD has set out a comprehensive set of specific Environmental and Social Requirements (ESRs) that projects are expected to meet. ESR 10 (Stakeholder Engagement) of EBRD's Environmental and Social Policy (ESP) 2024 emphasizes the importance of an open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship. It requires that stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

In accordance with ESR 10, projects are required to:

- Identify and document the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project (affected parties); or (ii) may have an interest in the project (other interested parties), including individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status, and those with differing interests within the identified groups (e.g. by gender or age).
- Develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale of the risks, impacts and development stage of the project, and conduct stakeholder engagement based on providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable, and accessible information.
- Disclose relevant project information that helps affected communities and stakeholders understand the risks, impacts and opportunities of the project, providing access to information for affected communities, in the local language, and in a manner that is accessible and culturally appropriate for all groups.
- Conduct consultation that is meaningful, i.e. it is a two-way process that is inclusive and culturally appropriate, allowing representation of the views and specific needs of various groups identified in the SEP. Engage with and report to stakeholders on an ongoing basis throughout the project cycle. Establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints and concerns are received, handled, and resolved effectively, in a prompt and timely manner.

4 Brief Summary of Previous Stakeholder Engagement Activities

The proposed project has a wide range of stakeholders (including statutory consultees, local communities, businesses, farmers, landowners, and other affected groups) with differing interests that will require varied levels of information. Specific communication activities therefore need to be focused to meet the needs of individuals and particular groups, especially vulnerable groups. This requires an understanding of the stakeholders and their interest in the project.

Stakeholders have been involved from the beginning of the planning phase for this project. The Project was developed during the Feasibility stage WB14-REG-TRA-01 (WBIF - IPF 5, 2019), in communication with all relevant institutional stakeholders and comprehensive stakeholder engagement activities.

As a part of Preliminary design stage under WBIF IPF10 organization (WB24-ALB-TRA-01), an exhaustive communication activity has been undertaken to gather relevant data for the project design and to promote the project.

Early in 2022 year (March and April), introductory in person meetings were conducted with institutional stakeholders to inform about the project activity and establish communication. Meetings continued with project introductory activities to the Municipality's representatives, and all three municipalities were communicated and interacted directly, in their premises.

After conclusion of the E&S Scoping Report and prior to commencement of social survey, a set of three public Project presentation events was organized and conducted. Three public Project presentations were held on 30 and 31st March 2023 in the premises of all three municipalities. The public Project presentation/information disclosure event was promoted/advertised on the websites of the Municipalities. More on this event in annex VI and annex V.

Carefully tailored socio-economic survey for the needs of social baseline, took place in May-July 2023. This thorough socioeconomic survey for the ESIA baseline purposes was conducted in the settlements being part of Project area of influence (PAI), on a sample of 209 questionnaires, that is 0.333% of total number of households in all three municipalities, according to the 2011 Population and Households Census. It also places special focus on the households located within the proposed expropriation lines (or next to it if refusal for cooperation occurs). Information on the survey was distributed by the Municipalities on their own website and information was shared at the Project Presentation events in end March 2023. All respondents were informed on the motorway project, purpose of the survey and project elements prior to start of fulfilment of the questionnaire.

In Lezhe, present stakeholders show interest in the scope of the expropriation and related issues. Also, they were interested in mitigation measures related to noise disturbance during the construction works.

In Vau i Dejes present participants show interest in expropriation and unresolved issue with the legal ownership of the land they currently use. A significant part of the properties that are expropriated are not registered in the registration offices (state cadastre office) and do not have ownership certificates. Also, whether the owner/users can continue with agricultural activities on the affected land until the construction activities took place (after the expropriation act).

In Shkoder, participants raised problems related to road safety and pedestrian life safety, asking for planned underpasses and their locations. Furthermore, participants' interest was whether the project will assist the

land users and landowners to obtain legal ownership documentation from the registration office, since this is a remaining issue from the communism times. Also, frequent flooding of the area (river Buna) and the road construction activities were challenged.

After completing the Environmental and Social Impact Assessment report (ESIA), Stakeholder Engagement Plan (SEP), Resettlement Framework (RF), Non-Technical Summary (NTS), Environmental and Social Action Plan (ESAP), Environmental and Social Management Plan (ESMP) and Biodiversity Management Plan and disclosure of the NTS on the MIE website [here], four public consultation meetings with relevant stakeholders were organized facilitated by MIE. MIE contacted municipalities who organized meetings with the relevant stakeholders in their respective Municipality.

Four public consultation events were held on 20 and 21st May 2024 in the respective premises of the three Municipalities (Lezha, Shkoder and Vau I Dejes), while the event in Tirana was held in the premises of the Ministry of Infrastructure and Energy. The event of presentation of ESIA findings / consultation was promoted/advertised on the websites of the Municipalities. More on this event in annex A and annex 7.

For the meeting in Tirana, MIE sent invitations to the relevant stakeholders listed in the SEP. None of the NGOs turned up, while there was a presence by relevant institutions (ministries and agencies). Main points of their interest were Transborder consultation and impacts, as well as Cumulative impacts. More on this event in annex 5 and annex 7. I.

Participants at the meeting in Lezhe expressed interest in legal basis and authority that will carry the expropriation process, along with the possibility to learn the exact project footprint so to approve development plans that will not be affected with the project activities. More on this event in annex 5 and annex 7.II.

The meeting in Shkoder offered possibility to the participants to ask questions that are related to the opportunity to introduce changes to the preliminary design and avoid affecting the existing businesses located close to the border with Montenegro. Although highly desirable, unfortunately it is not possible to change the proposal due to the technical propositions in designing roads. The main point of connection is agreed among both countries, and it is unlikely to be changed. More on this event in annex 5 and annex 7.III.

The discussion at the meeting in Vau i Dejes focuses on the possibility to obtain the final list of parcels that will be affected (the project's expropriation line), the possibility to learn the compensation prices for the land and what will happen with the access to the affected parcels. Municipality raises the question regarding the problem with the ownership status and missing Land Certificates for the land people use. All questions were answered. More on this event in annex 5 and annex 7.IV.

On 3rd July 2024, a public presentation of the project design, findings and E&S documentation was organized in Tirana where, beside representatives of institutional stakeholders and media, other interested parties attended the event.

5 Stakeholder Identification and Analysis

Key stakeholders who are to be informed and consulted about the Project are:

- A. Affected or likely to be affected by the project (Project-affected parties); and
- B. May have an interest in the project (Other interested parties).

5.1 Project's Stakeholders

The following table presents the Stakeholder identification and analysis of the approach for communicating with these individual stakeholders.

Table 2. Stakeholder Analysis and Communication Requirements

Identified stakeholder	Specific issues or interests	Communication and engagement methods
Project Affected Parties		
Residents whose property will be affected by the project activities: a) living within the project footprint b) living outside of the project footprint c) People whose livelihood will be directly affected with land acquisition	• Providing timely information on the need for land acquisition and resettlement, and alerting appropriate social and other relevant local authorities • Adequate and timely compensation for the acquisition of/or damage to property (Land, Crops and objects) • Potential interest in health issues related to project • Disruption of daily routine and paths of movement of people • Compensation for adverse effect to livelihood	• Communication during the process of land acquisition and/or resettlement, within the possibilities • Online presentation materials • Media/press releases • Online social media (Facebook, YouTube, Instagram, others), Official website, Viber & WhatsApp, other • Telephone calls • Direct email communication • Consultation and coordination meetings with physical presence and Online • Public announcement on visible public locations along the alignment (stores, schools, markets, bulletin boards outdoor and indoor-Municipality's premises ...)
Local residents living next to the project footprint or in the project area of influence and are not affected by the expropriation but are experiencing the effects of Project related construction and operation activities (Farmers that irrigate, disrupted paths of movement of farmers to reach their fields, students traveling towards settlements where they study, national and international drivers and passengers, private transporters passing through the area, etc).	• Providing timely information on risks and disturbances associated with the construction and operation period • Public safety during construction and during operations. • Potential interest in health issues related to project • Disruption of daily routine and paths of movement of people • Interest in potential employment or service-providing opportunities	• Online social media (Facebook, YouTube, Instagram), Official website, Viber & WhatsApp, other. • media / press releases; • periodic reporting; and the EBRD requirements for environmental parameters and real-time reporting • Disclosing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board of the affected municipality, at least two weeks prior to the start of any construction works, and a week

Identified stakeholder	Specific issues or interests	Communication and engagement methods
	during construction and operations	prior any significant change in the construction phase that is of particular interest to the local affected population • Consultation and coordination meetings with physical presence and online
• Municipality of Lezhe • Municipality of Shkodra • Municipality of Vau I Dejes • Public communal enterprises in each of the affected municipalities	• Successful realization of the project with minimal adverse environmental or social impacts. • Minimizing the economic damages. • Disruption of daily routine and paths of movement of people and businesses during construction and operation. • Effects on agricultural activities and affected people's livelihood • Providing timely information on risks and disturbances associated with the construction and operation period • Establishing cooperation with stakeholders	• Consultation and coordination meetings with physical presence and online • Public consultation meetings. • Direct email communication • Official correspondence
Other Interested Parties		
General public in the affected municipalities	• Existence of Project related construction activities. • Providing timely information on Project benefits and risks	• Online presentation materials. • Media/press releases. • Public consultation meetings, if possible. • Online social media (Facebook, YouTube, Instagram, others), Official website, Viber & WhatsApp, other.
Foreign Tourists passing through the area	• Existence of Project related construction activities. • Need to plan and organize passage through the area	• Online presentation materials. • Media/press releases. • Public consultation meetings, if possible. • Online social media (Facebook, YouTube, Instagram, others), Official website, Viber & WhatsApp, other.
Relevant governmental authorities, ministries, and public institutions, including: • Ministry of Infrastructure and Energy • Ministry for Europe and Foreign Affairs • Ministry of Defence • Ministry of Finance • Ministry of Education • Ministry of Health and Social Welfare • Ministry of Tourism, Culture and Sports	• Consultations with relevant governmental authorities concerning Project activities in the framework of permitting procedures. • Reporting based on national legislation requirements • Issuing permits, consents and opinions in accordance with local legislation, control of compliance with local legislation	• Direct email communication • Official correspondence • Consultation and coordination meetings with physical presence and Online • Individual and Public consultation meetings

Identified stakeholder	Specific issues or interests	Communication and engagement methods
- Ministry of Agriculture and Rural Development - Ministry of Environment	Consultations and information share with governmental agencies that might have an interest in project realization (directly or indirectly affects their operations)	
Relevant authorities and public institutions responsible for care of protected areas, locations and objects, including: - State Cadastre Agency - National Environment Agency - National Agency of Protected Areas - National Agency of Natural Resources - National Tourism Agency - General Directorate of Customs - National Civil Protection Agency - National Agency for Employment and Skills - Energy Regulatory Authority - Electronic and Postal Communications Authority - General Directorate of Road Transport Services - Transport Institute - National Agency for Information Society - National Agency of Water Supply, Sewerage and Waste Infrastructure - Albanian Development Fund	- Consultations relevant to the protected sites, areas and objects - Implementation of measures of protection if these are affected by the project - Cultural and historical significance of the locations and objects - Biological significance of the locations, area and objects	- Consultation and coordination meetings with physical presence and online - Public consultation meetings. - Direct email communication - Official correspondence
Relevant and affected public infrastructure companies: - Transmission System Operator - Electricity Distribution Operator (OSHEE Group) - Albanian Railways	Dislocation of some of the existing infrastructure	- Consultation and coordination meetings with physical presence and online - Public consultation meetings. - Direct email communication - Official correspondence
Interested non-governmental organizations (NGOs) Environmental NGOs, Social Welfare NGOs, Women associations, Other NGOs and CSOs¹	Stakeholders interested in protection of the environment and biodiversity, and residents' health and development.	- Individual consultation meetings as necessary - Public consultation meetings, where possible - Direct email communication - Media/ press releases - Online social media (Facebook, YouTube, Instagram), Official website, Viber & WhatsApp, other.
Beneficiary's employees (and PIU), and relevant Trade Union/s	Stakeholders directly or indirectly engaged in Project planning and implementation.	- ARA internal communication channels. - Trainings as necessary.

¹ **Note:** Any organizations interested in the Project can send their contact details to the PIU to be included in the Table of NGOs provided in Appendix 4 of this SEP and notified directly about Project events.

Identified stakeholder	Specific issues or interests	Communication and engagement methods
	Successful realization of the project's aims and objectives. Providing timely information about the planned Project activities to the relevant stakeholders	
Contractors or subcontractors during construction (and operation), monitoring and supervision of works, and their employees, and maintenance related workers. Suppliers.	Stakeholders of high significance for the Project's success who are directly or indirectly engaged in Project planning, implementation and infrastructure maintenance. Provision of Project code of conduct and work safety and health regulations, environmental protection requirements	- Information through tender procedure and contracts. - Communication via supervising engineers. - Toolbox talks at construction sites on health and safety topics. - Monthly reports on progress of works to be submitted by contractors during construction works - Trainings - Email communication.
Businesses in: - Trade and Retail, - Transport domain, - Tourism domain, Agriculture domain; - Investors - other private sector stakeholders	Involvement in development of project activities suitable to their needs and capacities. Informed businesses who will need to adjust their investments and operations to the planned activities and outcomes of the project	- Individual consultation meetings as necessary. - Public consultation meetings, if possible. - Direct email communication - Media/ press releases.
Donors and Other International and Supranational Organizations - The European Union - Western Balkans Investment Framework - European Bank for Development and Reconstruction - Other	Interest in ensuring the Project meets its objectives, technically and financially, and does so in a manner that meets international environmental and social standards. Realization of addressed support and finances	- Direct email communication. - Media/ press releases. - Online social media (Facebook, YouTube, Instagram), Official website, Viber & WhatsApp - Public consultation meetings, if possible.
'International NGOs that monitor the environmental and social performance of donors	Their interests are to see that international standards are followed, and they will place great efforts to diligently monitor the project implementation	- Online presentation materials - Media/press releases - Online social media (Facebook, YouTube, Instagram), Official website, Viber & WhatsApp - Direct email communication

5.2 Disadvantaged / Vulnerable individuals or groups

Disadvantaged / vulnerable individuals or groups are, potentially, disproportionately affected and less able to benefit from opportunities offered by the Project, owing to specific difficulties to access and/or understand information about the Project and its environmental and social impacts and mitigation strategies.

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

During assessments and preparation of this SEP, potential groups in the wider area around the project who might be affected by this project, differently due to their gender, age, ethnicity, religion and other cultural,

physical or other attributes (i.e. due to the digital divide, without internet access, rural areas), were examined. This assessment shows that there are vulnerable or disadvantaged individuals in the project affected area that will be affected with the activities of this project and/or might require different channels of communication. These vulnerable groups are farmers experiencing flooding, livestock owners, poor farmers and elderly landowners/users.

Vulnerable groups, beside regular communication and engagement methods will be communicated by PIU in cooperation with the affected municipalities' project designated staff (in person) and with dedicated project flyer. This engagement will be conducted in the Main Design phase, that follows this Preliminary Design phase. In addition, such practice will continue in the Construction phase, as well, where the leading role will be given to the Contractor in cooperation with the affected municipality's staff who, indeed, knows who these vulnerable groups are within their municipality and how to reach them.

If Beneficiary, during project implementation, identifies further vulnerable individuals of groups affected by the Project, they will be added to this SEP and appropriate communication methods will be identified and engagement activities will be conducted.

5.3 Gender Considerations

This SEP treats men and women equally, due to the fact that traditionally, women's views and concerns are more likely to be under-represented, in public consultation processes, than those of men and, therefore, the SEP includes positive discrimination, in favour of women, to counteract this underlying bias.

Gender considerations have been incorporated into the SEP and the future engagement methods. Engagement activities are designed to allow women to participate, i.e. focus groups and workshops. There are multiple methods for women to get involved in consultations and provide feedback on different aspects of the Project. Women are and will continuously be consulted on the Project activities. Further details on consultation methods are provided in Section 6 of this document.

Women will also be consulted on road safety and worker's influx safety and providing them with fair and equal representation in decision-making situations and providing them with greater awareness of road safety from a gender and children's perspective, at the beginning of construction phase. In addition, women will not be ignored for employment opportunities or for service-providing opportunities and would be treated equally once they are employed within the project construction and project operational phase.

To ensure meaningful participation of women, the Project will implement targeted measures to address potential barriers to engagement. These measures include:

- (i) ensuring at least 33% female participation in consultations
- (ii) organizing women-only meetings where culturally appropriate
- (iii) scheduling consultations at times convenient for women, including evenings or weekends
- (iv) engaging female facilitators
- (v) maintaining gender-disaggregated records of participation and grievances. Progress will be monitored quarterly and reported in SEP implementation reports.

6 Stakeholder Engagement Program

6.1 Strategy for Information Disclosure and Consultation

For the Project's purposes MIE/ARA will use different methods of stakeholder engagement to ensure continuous communication with all interested stakeholders and to make all necessary information available and accessible to the public. ARA, in cooperation with the affected municipalities, as well as the local communities affected by the Project will ensure that local residents and businesses living or operating in the vicinity of the Project area of influence, as well as of those project's neighbouring settlements are regularly informed about the Project development process, particularly addressing start of construction activities and its impacts on the local roads, landowners and present businesses.

ARA/MIE will carry out public consultations and information dissemination that will reflect main issues of relevance to the Project. Four separate public disclosure events where ESIA disclosure package shall be promoted and discussion upon it will be conducted in person by all interested individuals and groups/organizations (i.e affected and interested stakeholders) will be organized, one in each of the three affected municipalities and in Tirana for stakeholders such as public enterprises, ministries, NGOs and other organizations.

During the upcoming E&S assessment, ARA will produce a public disclosure package, containing:

- Non-Technical Summary (NTS)
- Environment and Social Management Plan (ESMP)
- Biodiversity Management Plan (BMP)
- Stakeholder Engagement Plan (SEP)
- Project Grievance Form (see Annex 1)
- Resettlement Plan (RP) and
- Environmental and Social Action Plan (ESAP)

All project promotional documentation will be published on MIE web site (www.infrastruktura.gov.al), Albanian Road Authority (www.arrsh.gov.al) and the web site of Municipality of Shkodra (www.bashkiashkoder.gov.al), Municipality of Lezha (www.lezha.gov.al) and Municipality of Vau i Dejes (www.vaudejes.gov.al). Documents will be prepared in English and in Albanian language and become available upon their official approval by EBRD. Documents will remain disclosed during a period of 120 calendar days. All interested parties can comment on the presented documentation for the given period. The ESIA Study will also be publicly available for 30 days on the MoTE's website, for the national disclosure procedure.

Relevant institutional stakeholders, public enterprises and organizations will be directly invited to these meetings, while general public will be invited through the available media and internet information spots, such as social media, websites of affected municipalities and web information portals.

MIE will inform all stakeholders about the exact date, time, and venue where and how the presentation will be held, at least 7 days in advance (but preferably 2 weeks), by disclosure through the social media, websites of the MIE and Municipalities of Lezha, Shkodra and Vau i Dejes, local media (newspapers, online news portals) and the bulletin boards of each of the municipalities. The announcement of the public meeting will also, be posted in the affected and project neighbouring settlements, in order to specifically target the local population living in these communities. In addition, NGOs listed in Annex 4 to this SEP will be directly contacted and informed of the public disclosure event.

All justified comments and proposals will be considered and appropriately addressed. The MIE will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

All available Project information and documents will be disclosed to the public at least 2 weeks in advance of any planned presentation event. If necessary, separate online and individual meetings and direct communication will be held to ensure that the stakeholder engagement is gender responsive.

A summary of all stakeholder engagement and disclosure requirements listed above is provided in Table below.

Table 3. Summary of Stakeholder Engagement and Disclosure Requirements in Pre-construction phase

No	Activity	Timing and Responsibility	Stakeholders
1	Disclosure of Scoping report and SEP on the website of ARA and MIE	Pre-construction. March 2026. Responsibility: ARA/MIE	General Public
2	Disclosure of project's ESIA documentation on the websites of MIE and ARA and the three affected municipalities: - Non-Technical Summary (NTS) - Environment and Social Management Plan (ESMP) - Biodiversity Management Plan (BMP) - Stakeholder Engagement Plan (SEP) - Project Grievance Form (Annex 1) - Resettlement Plan (RP); and - Environmental and Social Action Plan (ESAP) Print and keep hard copies of documents at premises of ARA and Municipalities of Lezhe, Vau I Dejes and Shkodra	Pre-construction. End of 2026. All available Project information and documents will be disclosed to the public, at least 2 weeks in advance prior to the public meeting. Responsibility: ARA/MIE	All stakeholders, including general public
3	Resettlement related Socio-economic survey	Pre-construction. Q2-Q3 2026. Conducting Socio-economic survey with the affected land-owners/affected parties. Responsibility: ARA / MIE	Project affected people
4	Resettlement related communication	Pre-construction. Q4 2026. Presentation of Resettlement Plan to the affected people and wider audience on a public meeting. Responsibility: ARA / MIE	Project affected people
5	Organise a public presentation/hearing for the ESIA documentation	Pre-construction. December 2026. Presentation to be organized through available online platforms. Public to be informed (through media advertising) and invited to register to participate on the presentation. Businesses and NGOs (listed in Annex 4 to this SEP) in the project affected area will be invited by letter/email. Responsibility: ARA, NEA, MoTE, MIE	All stakeholders, including general public
6	Document all opinions, remarks, and possible solutions with regards to the Project raised by stakeholders during	Ongoing, throughout all three phases. Responsibility: ARA	All stakeholders, including general public

No	Activity	Timing and Responsibility	Stakeholders
	consultation meetings, and address appropriately		
7	ARA to Set/appoint Community Liasson Office/r in the Project area that will be used/responsible for SE related activities and Grievances	Construction Phase: Prior commencement of any civil works. Responsibility: ARA	All stakeholders, including general public
8	Publicize information about the extent, timing and duration of planned construction works, and any expected disruptions and inconveniences via the websites of ARA and the affected municipalities and at the visible locations throughout the affected local communities (Project's bulletin boards)	Construction Phase. Prior to start of civil works take place Two weeks prior to the start of construction works Responsibility: Contractor. ARA to monitor	General Public

The PIU will communicate with all relevant stakeholders and will inform them about any changes in the Project's dynamics. Any such updates will be published on MIE and the Municipalities' web sites and by way of leaflets to the local communities in the Project area.

6.2 Resettlement Related Communication

Additional stakeholder engagement activities with the land/property owners (PAPs) and disclosure of relevant resettlement information, will be performed during realization of the Resettlement Plan, which is planned to be completed and compensation paid prior commencement of construction activities. These information disclosure and communication activities will be registered in the Annex V of this document.

6.3 Cross-border Consultations

Since the Project has a transboundary context, with Montenegro and Albania being concerned parties, meaningful cross-border consultation in regard to the further Project implementation between competent authorities of both countries will be initiated and carried out. In that context, the Albanian competent authority² is requested to notify, as early as possible, the affected country (Montenegro) about:

- the Project and all the available data on the potential environmental impacts;
- the nature of the decision that can be made;
- the deadline in which the concerned country can announce its intention to participate in the EIA procedure.

In regard to the EIA consent, the competent authority will notify the affected country on the following issues:

- the content of the EIA consent - decision and conditions if they are determined;

² Albanian line Ministry - Ministry of Tourism and Environment

- the reasons on which the decision is based, including the reasons for accepting the EIA Study, proposals and opinions of the concerned stakeholders and public;
- the key measures to eliminate, prevent, mitigate or remediate the adverse environmental impacts.

Information and consultation with the affected country about possible cross-border impacts will be carried out in accordance with the Albanian law³ and relevant ratified international agreements⁴

6.4 Future Project Phases

Throughout the life of the Project, MIE/ARA, PIU and the Contractor(s) engaged to construct the Project's assets will continue to engage with stakeholders and this Stakeholder Engagement Plan will be updated to reflect Project progress. The SEP will be updated prior to commencement of construction, issues raised during the construction process will be documented and a response provided through the mechanisms described in this SEP.

Printed copies of ESIA public disclosure package will be available in MIE/ARA and main premises of all three Municipalities. In addition, printed copies of ESIA and relevant project documents will be available on construction site, the Contractor's office - upon beginning of construction works, and the affected municipalities' premises.

During construction, Information Boards will be installed by the main Contractor, next to the roads that serve as entry/exit roads to/from the construction sites and lead toward project's neighbouring settlements. These boards will also serve as a channel for communication with the residents from affected settlements, listed in Table 1. Information in relation to the Grievance Mechanism will also be included. Contractors will be required to secure sites prior to any construction activities taking place and will be required to ensure that appropriate construction and warning signs are in place.

All presentation materials, as well as relevant project documentation, will be available on the website of MIE (www.infrastruktura.gov.al) and ARA (www.arrsh.gov.al), during the lifetime of the project.

Any information regarding this project in the operational phase will be publicized on the ARA's (www.arrsh.gov.al) website, as a public maintenance company, and social media it operates.

An update to the SEP will be made prior to the commencement of construction activities relating to the motorway and its auxiliary objects, once the Contractor defines the working strategy, and again prior to commencement of operational phase.

In construction phase, it is foreseen an Emergency Preparedness and Response Plan (EPRP) to organize and establish particular communication channel and procedure between Contractor/s, ARA, MIE, Municipalities and institutions responsible for quick response in emergency situation. This communication should be also registered in the Annex V of this document. In addition, such EPRP will be created and implemented during operational phase and its communication shall be registered in annex V of this SEP, as well.

During Construction phase ARA will establish Project's Community Liaison Office (CLO) in the city of Lezha (or Shkodra), which will serve as an outpost where people can obtain additional information on the project, ongoing and planned construction activities and where people can lodge grievance.

³ Albanian Law on the EIA and associated by-law documents

⁴ UNECE Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention)

7 Resources and Responsibilities

A Project Implementation Unit (PIU), that has not been appointed by ARA yet, but once established it will be responsible for Project implementation, including implementation of the stakeholder engagement activities set out in this SEP. The PIU will incorporate necessary organizational structure, capacity and competencies, appropriate to the nature and scale of the Project and commensurate with the level of its environmental and social risks and impacts. The PIU will be in regular communication with EBRD.

For the purpose of effective realization of planned stakeholder engagement activities, the PIU will use its own financial means. Works contracts will require contractors to be responsible in respect of any required stakeholder engagement activities falling within their remit.

A responsible person will be appointed by PIU for implementation of this SEP during the entire Project-cycle, and in charge of communicating with the communities. Her/his contact information shall be updated if and when needed.

Any contractors procured to execute works or other specific Project activities will also be required to implement the relevant provisions of SEP (for more details, see Chapter 6). The grievance mechanism requirements will be laid out in the tender documentation and contracts signed with the contractors.

Costs of the stakeholder engagement activities will be calculated in the updated SEP version prior to construction activities commence, once the contractor defines his working strategy.

8 Grievance Mechanism

PIU will establish a Grievance Procedure whereby all Project stakeholders will be informed of the Grievance Mechanism, contact persons from the Municipalities responsible for implementation of Grievance Mechanism, as well as the forms for submitting complaints.

The Project Grievance Leaflet and Grievance Form (Annex 1) will be available on MIE and municipalities' web sites, as well as in printed form, available at the local Municipality premises.

Grievances can also be raised verbally, in person or on the phone, and such received grievances shall be registered into the Grievance log and forwarded to PIU.

In case of the Municipality receiving any grievance, in printed form or by e-mail, it will deliver any such communication to local project office within 3 days' period, who will immediately forward it to the PIU for further processing. Additionally, any comments provided by stakeholders can be communicated personally or by telephone or in writing in the Grievance Form. Anonymous lodging of grievances shall be permitted.

A Grievance Form may be also submitted to works contractors during the construction phase. The Grievance Leaflet and Form will be available on construction site, in Albanian language, in printed form, and the Leaflet will be also hung on construction site bulletin boards in order to be visible to the public and interested parties. Works contracts will require contractors to forward all received grievances to the Supervisor / Engineer who will, in turn, forward to the Project's contact person in the PIU.

All grievances will be recorded in a Grievance Registry (Annex 3) and acknowledged within 7 calendar day period. The stakeholder-complainant will be informed by PIU about proposed corrective measures and actions taken within 15 calendar days upon the acknowledgement of any grievance. In the case that PIU is not able to resolve the issue, or in any cases where action is not required, PIU will provide an explanation and justification to the Complainant and will advise how to proceed further with the grievance, in the case that the

Complainant is not satisfied with the outcome. Complainants will be able to seek other, legal, remedies in accordance with Albanian laws and regulations.

The MIE will monitor the way in which grievances are being handled and PIU will keep a full record of the process in the Grievance Registry. The Registry will serve as the basis for completion of the Grievance Management Reports that will be included into the semi-annual (or quarterly, if decided to be conducted more frequently) Environmental and Social reports to the Bank.

The PIU will publish, and regularly update, all relevant documents and grievance procedures on MIE and ARA website, and will also provide hard copies of Grievance Forms to the Municipalities of Lezha, Shkodra and Vau i Dejes. The PIU will provide feedback to any stakeholder which completed a Grievance Form by e-mail or mail.

At all times, complainants may seek other legal remedies in accordance with the legal framework of Republic of Albania, including formal judicial appeal.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy⁵ which includes ten Environmental and Social Requirements (ESRs) for key areas of environmental and social sustainability that projects are required to meet, including ESR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM)⁶, as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy⁷; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

Contact information for enquiries and grievances:

Attention: **For the Murriqan-Lezhe Motorway**

Autoriteti Rrugor Shqiptar (ARRSh)

Address: Sami Frasheri 33, Tirana, Albania

Tel: +355 4 223 44 87

E-mail: info@arrsh.gov.al

Grievance log will be published on the ARA's webpage, dedicated for the Motorway, on semi-annual base.

A separate grievance mechanism will be available for workers engaged on this project (contractors and subcontractors) during construction, including those of ARA employees. This separate grievance mechanism for workers will continue to be operative in operational phase and will include, beside MIE's and ARA employees, those of the subcontractors engaged on road maintenance activities.

An anonymous and confidential grievance channel for women, within main grievance mechanism will be established, with an option to speak to a female GRM focal point.

Another separate grievance mechanism will be available for the Resettlement related issues, but this will be part of Resettlement plan.

⁵ <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

⁶ <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism.html>

⁷ <https://www.ebrd.com/home/who-we-are/strategies-governance-compliance/access-to-information-policy.html>

9 Monitoring and Reporting

The PIU will prepare separate Stakeholder Engagement Activities Reports to document the Stakeholder Engagement Process. The first report shall be produced six months from start of the Project's construction activities and will be continued, on a semi-annual basis, until completion of construction works.

The PIU will, also, prepare and include a chapter on stakeholder engagement and grievances in the monthly/quarterly Project reports, and annual reports.

The reports will include the following information:

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

After works completion and commissioning, the PIU will prepare Monitoring Reports annually, during operation of the Motorway. Monitoring Reports will contain information about:

- Consultation meetings with stakeholders (place, time, issues discussed, mitigation measures by PIU)
- Grievances identified in the reporting period (and all detailed information about it)

Each Stakeholder Engagement Activities Report for this Project will be published on the ARA's website for public review and further comments. PIU will invite external monitoring by interested NGO/CSO in the local area to monitor implementation of SEP activities.

Indicators to be monitored during SEP implementation are given in the table below.

Table 4. KPI - Indicators to be monitored during SEP implementation

Category	SMART Key Performance Indicator (KPI)	Frequency	Data Source / Verification
Pre-Project Disclosure	Pre-Mobilization Notification: 100% of stakeholders in affected road segments (Lezhë, Shkodra, Vau i Dejës) notified in writing/media at least 14 days prior to works.	Pre-Construction	Notification logs, local media clips.
	Document Accessibility: Number of Physical Information Centers (PICs) established 30 days before works in affected municipality and printed version of NTS/SEP/ESIA/RAP in Albanian available at the location.	Monthly Audit	Site visit photos, visitor logs.
Consultation & Inclusion	Inclusion Rate: at least 20% of participants in public consultations from identified "Vulnerable Groups" (Roma/Egyptian, elderly, female-headed HHs).	Per Event	Signed Attendance Sheets (gender-disaggregated).
Grievance Redress (GRM)	Acknowledge Speed: 100 % of grievances recorded in the Annex 3 Log and acknowledged in writing to the complainant within 5-7 working days.	Monthly	Grievance Log (Annex 3).
	Resolution Efficiency: more than 95% of grievances resolved or formally moved to an appeal stage within 20-30 working days.	Quarterly	Closure forms signed by complainant.

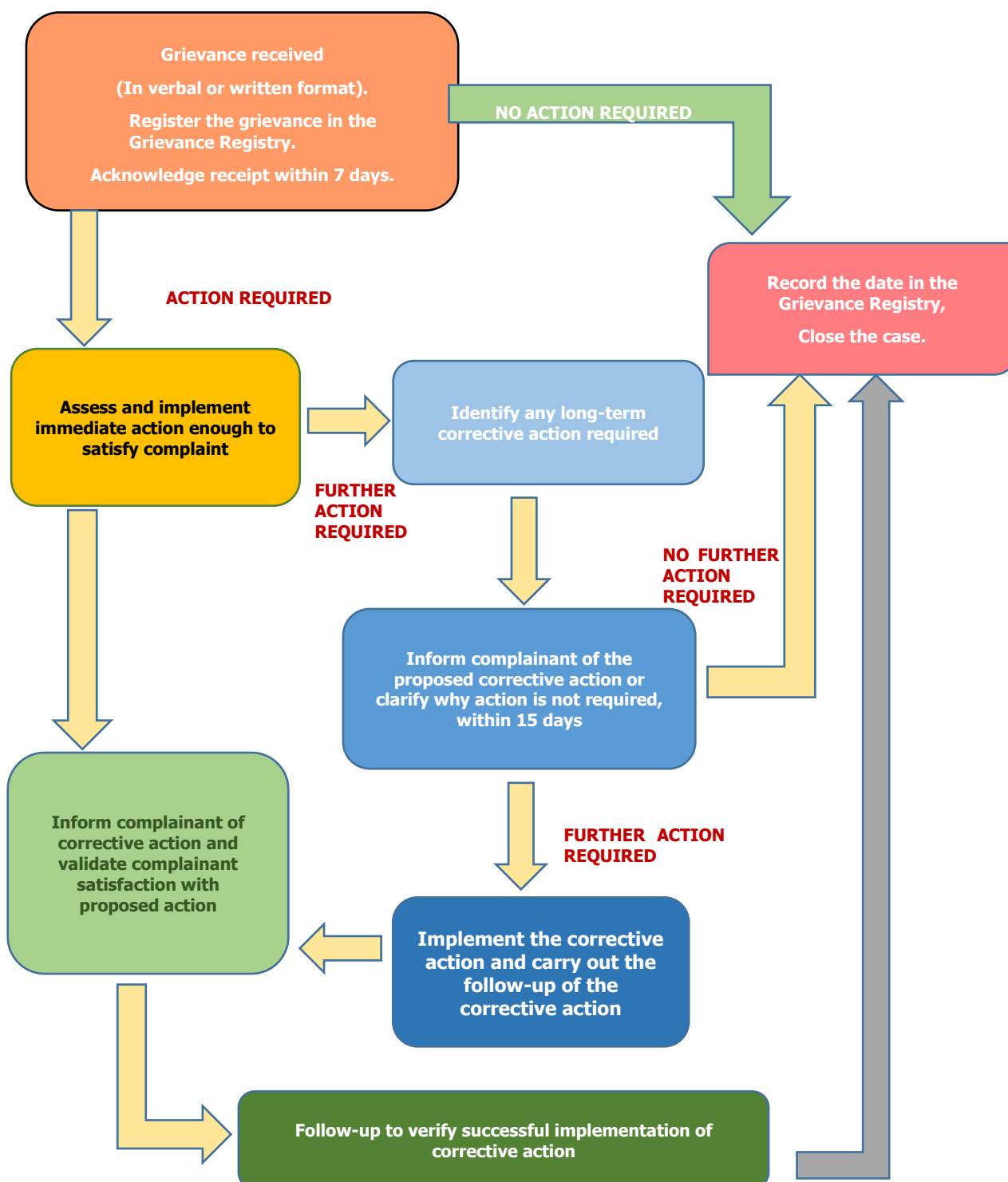
Category	SMART Key Performance Indicator (KPI)	Frequency	Data Source / Verification
	Recurrence Rate: Number of repeat grievances regarding the same recurring issue (e.g., dust at a specific Shkodra bypass point). Share not to exceed 5% recurrence.	Monthly	Trend Analysis Report.
Accountability & Feedback	Correction Action Rate: more than 70% of mitigation measures or design changes adopted based on documented stakeholder feedback.	Quarterly	E&S Progress Reports / Site Instructions.

Appendices

Annex 1 Project Grievance Mechanism

Reference No:	
Full Name and Surname: <i>(You can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent)</i>	
Contact information: Please mark how you wish to be contacted (mail, telephone, e-mail)	By Post: (Please provide postal address) _____ _____ By phone: _____ By e-mail: _____
Preferred language of communication:	Albanian Other: _____
Description of incident/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? 	
Signature: Please return this form to: Mr/Ms. - (To be appointed by ARA) email: info@arrsh.gov.al tel. +355 4 22222 45 fax. + +355 4 2234052	Date: Address: Albanian Road Authority Sami Frasheri 33, 1001 Tirana Republic of Albania

Annex 2 Project Grievance Procedure



Annex 3 Project Grievance Register

The Project Grievance Register, kept in digital format as a spreadsheet file, should contain the following information:

Phase	Required information	Grievance 1	Grievance 2	Grievance 3
ENTRY	Initiation			
	Location of residence			
	Type of problem			
	Name and surname			
	Contact information			
	Date of entry			
	Acknowledgement for the receipt of Grievance			
PROBLEM	Description of the Problem			
	Proposed solution			
	Actions to be undertaken for problem solving			
EXIT	Date of closure			
	Grievance's Follow-up			
	Results of the intervention			
	Recurrence Y/N			

Annex 4 Contact Information of Identifies Stakeholders

No.	Name of the Stakeholder (Organization / Institution / PAPs)	Contact data
Local Authorities and Public Enterprises		
	Municipality of Lezhe	Lagjja "Skenderbeg", Sheshi "Gjergj Kastrioti" 4501 Lezhë, info@lezha.gov.al https://www.lezha.gov.al/
	Municipality of Shkodra	Rruga 13 Dhjetori, Nr. 1, Shkoder, Albania +355 22 400 150 https://www.bashkiashkoder.gov.al
	Municipality of Vau i Dejes	Rruga "Qafa e Gurit", Vau Dejes + 355 61 20 006 info@vaudejes.gov.al https://www.vaudejes.gov.al/
Ministries and Governmental institutions		
	Ministry of Infrastructure and Energy	Rr. "Abdi Toptani", Nr.1, 1001, Tiranë, Shqipëri +355 4 22222 45 ext.74111 E-mail: sekretaria@infrastruktura.gov.al
	Ministry for Europe and Foreign Affairs	Boulevard Gjergj Fishta no 6, Tirane + 355 4 236 4090 Internal Exit 197 E-mail: koordinatorimfa@mfa.gov.al
	Ministry of Defence	Rruga e Dibrës, Tirana Contact: (04) 2224974; e-mail: informimi_mm@mod.gov.al
	Ministry of Finance and Economy	"Bulevardi Deshmoret e Kombit", No. 3. Tirane, Albania; Phone: +355 4 2244602; Fax: +355 4 2244602; info@fint.gov.al
	Ministry of Education and Sports	Rruga e Durrësit Nr.23 Tiranë, Shqipëri ALB-1001-TIRANA +35542230198 , +35542222260 Website: www.arsimi.gov.al/ E-mail: info@arsimi.gov.al
	Ministry of Health and Social Welfare	Rruga e Kavajes,Nr. 1001,Tirane,Shqiperi Tel: +355 4 2376 178 E-mail: info@shendetesia.gov.al
	Ministry of Culture	Street "Aleksandër Moisiu" Nr. 76 Ish - Kinostudio Tirana Albania (+355) 698 757 912

No.	Name of the Stakeholder (Organization / Institution / PAPs)	Contact data
		dda@kultura.gov.al https://kultura.gov.al/ http://www.dda.gov.al/kontakt.php
	Ministry of Agriculture and Rural Development	Sheshi Skënderbej 4, Tirana 1001 Website: www.bujqesia.gov.al/ E-mail: info@bujqesia.gov.al
	Ministry of Tourism and Environment	Bulevardi "Dëshmorët e Kombit", Nr.1. Tiranë E-mail: info@turizmi.gov.al +355 4 222 4537 https://turizmi.gov.al
Governmental Public Agencies		
	State Cadastre Agency	General Directorate Address: Rruga Dora D'Istria Tiranë email : ankesa@ashk.gov.al
	National Environment Agency (NEA)	Nr Address:. 4, Rruga Sami Frashëri, Tiranë +355 04 237 1237 info@akm.gov.al
	National Agency of Protected Areas	Bulevardi "Dëshmorët e Kombit", Nr.1. 1001, Tiranë +3554270622 E-Mail: info@akzm.gov.al
	National Agency of Natural Resources	Bulevardi "Bajram Curri", Blloku "Vasil Shanto" Tel: +355 4 2257117 ; Fax: +355 4 2257382 Email: info@akbn.gov.al
	National Tourism Agency	Bulevardi Gjergj Fishta, Pallati Shallvare, A12, 1010 AL +35542273778 Email: info@akt.gov.al
	General Directorate of Customs	Autostrada Tiranë-Durrës, Km 1, Rr. Industriale, Pajtoni Center, kati 5 Tel: +355 42 232 988 Cel: +355 684053453 Email: helpdesk.dpd@dogana.gov.al
	General Directorate of Civil Emergencies	Rruga e Dibrës, Tiranë. +355696877957 sektorii.shtypit@akmc.gov.al
	Energy Regulatory Authority	Bulevardi "Bajram Curri", Rruga "Viktor Eftimiu" Nr.1023, Tiranë (+355) 042222963; 042269590 Email: erealb@ere.gov.al

No.	Name of the Stakeholder (Organization / Institution / PAPs)	Contact data
	Electronic and Postal Communications Authority	Rruga "Reshit Çollaku", Kodi postar 1001, Tiranë +35542259572; 42259106 Email: info@akep.al
	General Directorate of Road Transport Services	
	National Employment Service	Rruga Vllazën Huta , Tiranë +355 4528360 Email: kontakt@akpa.gov.al
	Transport Institute	Rruga e Kavajës, Ndërtesa numer 39, Hyrja 3, Apartamenti 3, Tiranë +355 04 223 2974 Email: merlin.xhaja@ital.thenextgencorp.com
Religious Authorities		
Protection of Cultural Heritage		
	National Institute of Cultural Heritage	Rruga "Aleksandër Moisiu", nr. 76, ish Kinostudio "Shqipëria e Re", Tiranë +35544504152 https://kultura.gov.al
	Shkodër Regional Directorate of Cultural Heritage	Rruga "Marin Beçikemi", Sheshi "Gjon Pali II Telefon / fax: 02 2243409 Email: drkkshkoder@kultura.gov.al
National NGOs & CSOs		
	Federata e Pyjeve dhe Kullotave Komunale Shkodër	
	Instituti i Paqes, Zhvillimit dhe Inovacionit - ACLI- IPSIA në Shqipëri	Rr. Don Bosko, Shkoder, Shkodër, Albania 069 327 3843 acliscutari@gmail.com
	Misionarët e të Drejtave Sociale (MDSK)	
	Qendra T'REJA	
	Shoqata "Mendime dhe Iniciativa të Lira"	
	Shoqata e Artizanëve të Punimeve Artistike të Shqipërisë	Adresa : L. Mark Lula Rr. Nene Klelia Merloni Shkoder-Albania www.artizanati.com
	Qendra Trajnim, Edukim dhe Demokraci (TED)	Adresa: Rruga "Islam Alla", pallati 72/1, shk. 1, ap. 12,. Tiranë, Shqipëri. Email qendrated@gmail.com ...
	Shoqata për Integrimin Gjinor	
	Well Point-Kujdes për të gjithë	

No.	Name of the Stakeholder (Organization / Institution / PAPs)	Contact data
	Albanian Shkodra Lake FORUM	Address: Sheshi 2 Prilli, Rr. Berovic, K. I-re 22241877 www.shkodralake.al
	Business Improvement District - Shkodra (BID)	Rr. 13 Dhjetori , Shkoder 692411221 bid_shkodra@outlook.com;
	Shkodra Lake Albanian FORUM (FSLs)	Sheshi 2 Prilli, Rr. Berovic, Nr 2. Prane Rektoratit te Universitetit L.G, Shkoder 682052677 http://shkodralake.al
	Green Centre Albania	Laboratori Baktereologjik, Shkodër 0692155511 anilaneziri@yahoo.com;
	The woman in development	Rr. Studenti, Nd.2, H.14, Kati 7+, Ap.35, 4001 Shkodër 0682064846 info@gzhsh.org;
	Young intellectuals, Hope	L. "Qemal Stafa", Rr. "Daut Boriçi", 874, Shkodër 022248811; 0692255776 irsh_centre@yahoo.com;
	Lezha Regional Development Agency (LERDA)	Bulevardi "Gjergj Fishta", Pallati Nr. 35, Lezhë 021522190; 0672226785 www.lerda.al
	Woman, Vision of Change	Qendra e Artizanatit, Bulevardi Gjergj Fishta, Lezhe 021524582, 0672080384 madalena_gega@hotmail.it;
	Woman Center "Light Steps" (Hapa të Lehtë) (handling sensitive grievances or GBV (Gender- Based Violence) cases.)	Phone: +355 222 41316 Email: qendragruashk@yahoo.com
	Woman to Woman (Gruaja tek Gruaja)	tel: +355 696 090 527 email: info@gtg.al
	Gender Alliance for Development (GADC)	tel: +355 422 555 14 Email: gadc@gadc.org.al

No.	Name of the Stakeholder (Organization / Institution / PAPs)	Contact data
	Northern Roma (ReV)	Lagjia Skënderbeg, Lezhë 693109182
	Mary Ward Loreto Foundation	Email: info@marywardloreto.org Lezhë: gazmir.memaj@marywardloreto.org
	Social and cultural association "Shega Lezhjane"	Bulevardi "Gjergj Fishta", Pallati 136, shkalla 13, Lezhë 682298774 mark_gjoka@yahoo.com;
International NGOs/CSOs		
Other stakeholders		
	Kompleksi Celiku	Murriqan, Albania + 355 69 2095 872

Annex 5 Overview of Previous Stakeholder Engagement Activities

No.	Date / venue	Stakeholder Engagement Event	Present Stakeholders	Number of people communicated / consulted	Key issues discussed	Method
Stakeholder engagement activities under WB30-ALB-TRA-01 project						
1.					•	
2.					•	
Stakeholder engagement activities under WB24-ALB-TRA-01 project						
3.	03/07/2024	Closing presentation	General Public IPF10 Team and ESIA Experts EBRD, EUD, Institutional stakeholders	Unknown	• Presentation of the project design, findings, and E&S documentation	Open public meeting Media reporting
4.	21/05/2024, 13.00h Municipality of Vau i Dejes (Premises in Bushat)	Presentation of the ESIA findings	Public IPF10 Team and ESIA Experts	31 + (5)	• Obtaining the final list of affected parcels • Understanding the compensation price for the land to be acquired • Physical access to the affected parcels • Assistance from the MIE to resolve the Land certificate issue	Open public meeting
5.	21/05/2024, 10.00h Municipality of Shkoder	Presentation of the ESIA findings	Public IPF10 Team and ESIA Experts	27 + (5)	• Whether the alignment of the Motorway can be adjusted at this Preliminary phase so to avoid affecting the property/business at the border • to include a roundabout to provide direct connection to the municipality of Shkodra and the motorway. • What legislation will be followed during valuation of the property? • Land users and the inability to obtain Land Certificate • Are there going to be underpasses beneath the motorway so those who	Open public meeting

No.	Date / venue	Stakeholder Engagement Event	Present Stakeholders	Number of people communicated / consulted	Key issues discussed	Method
					own livestock can take this livestock on a pasture in the project area	
6.	20/05/2024, 15.00h Municipality of Lezhe	Presentation of the ESIA findings	Public IPF10 Team and ESIA Experts	31 + (5)	- Whether the preliminary design took into consideration to avoid to the maximum the number of houses that will be affected - Number of private properties to be affected and houses that will be demolished. - The exact project footprint so the Municipality can continue with the development plans in the area that has not been affected by the project. The concern is to freeze developments within the corridor and unfreeze the ones out of the corridor.	Open public meeting
7.	20/05/2024, 12.00h Tirana, Ministry of Infrastructure and Energy	Presentation of the ESIA findings	Ministries, Governmental agencies, Infrastructure companies, EUD	11 + (5)	- Transboundary consultation and impacts - Whether cumulative impacts have been considered - Whether the motorway part in MNE is ready for implementation	Meeting
8.	13/10/2023, 11.00h Skopje, RNM. Public place	Direct communication and consultation	Mr. Ali Celiku, owner of the Kompleksi Celiku, located 250m	2 + (1)	- Potential for dislocation of the motorway in order to avoid affecting land used as parking with licence for establishing gas station. - Grievance mechanism - EBRD related provisions on expropriation and land take	Individual meeting
9.	31/03/2023, 10.00h Municipality of Shkoder	Presentation of the project and E&S Scoping report elements to the public	Public IPF10 Team and ESIA Experts	33+ (+7)	- Project Presentation - Discussion on ESIA matters	Open public meeting

No.	Date / venue	Stakeholder Engagement Event	Present Stakeholders	Number of people communicated / consulted	Key issues discussed	Method
					- Human health and safety during construction – underpasses and overpasses - Objects set along the footprint - Expropriation rules and valuations - Flooding effects and the project - Inert materials that will be used for the purposes of project implementation	
10	30/03/2023, 16.00h Municipality of Vau i Dejes	Presentation of the project and E&S Scoping report elements to the public	Public IPF10 Team and ESIA Experts	50+ (+3)	- Project Presentation - Discussion on E&S Scoping elements (forthcoming surveys) - Discussion on ESIA matters - Expropriation issues: lack of land certificates by the farmers, part of the parcel that remain after expropriation - Land use until expropriation/ construction activities becomes effective - Existence of grievance mechanism	Open public meeting
11	30/03/2023, 12.00h Municipality of Lezhe	Presentation of the project and E&S Scoping report elements to the public	Public IPF10 Team and ESIA Experts	18 (+6)	- Project Presentation - Discussion on E&S Scoping elements (forthcoming surveys) - Discussion on ESIA matters - Existence of grievance mechanism	Open public meeting
12	13/01/2023 Online meeting	Dislocation of Water pumping station in lezhe	SETEC Engineering IPF10 Team and Motorway Design Engineer	9	- The relocation of the pumping station - expropriation of land will be required - The new location of the pumping station will be discussed with the municipality - installation of new equipment will be conducted together with the relocation of the station	Meeting

No.	Date / venue	Stakeholder Engagement Event	Present Stakeholders	Number of people communicated / consulted	Key issues discussed	Method
					- relocation of the pumping station must secure water supply for the area during the construction of the new station and minimum disturbance - The cost of the relocation of the pumping station could be included in the overall public infrastructure restoration cost of the highway project.	
13	11/04/2022, 14.00h National Environmental Agency (NEA) - Tirana	Project presentation to the Institutional stakeholders	NEA Management IPF10 Team and ESIA Experts	3 (+3)	- Project Presentation - Discussion on ESIA matters	Meeting
14	08/04/2022, 12.00h Oblike, Shkodra	Direct communication and consultation	Mr. Leon Jekaj, owner of the Camping Australia site located next to Buna river	1 (+2)	- Project features at the location next to the Camping area - Interest in expropriation process and whether it affects his business	Individual meeting
15	07/04/2022, 12.00h Municipality of Lezhe	Project presentation to the Institutional stakeholders	Municipality of Lezhe IPF10 Team and ESIA Experts	3 (+3)	- Project Presentation - Discussion on ESIA matters - Public consultations - Waste management capacities - Development projects in the project area	Meeting
16	07/04/2022, 12.00h Municipality of Vau I Dejes	Project presentation to the Institutional stakeholders	Municipality of Vau I Dejes IPF10 Team and ESIA Experts	2 (+3)	- Project Presentation - Discussion on ESIA matters - Flooding in the project area - Livelihood of the farmers whose land will be acquired - Development projects in the project area	Meeting

No.	Date / venue	Stakeholder Engagement Event	Present Stakeholders	Number of people communicated / consulted	Key issues discussed	Method
17	07/04/2022, 09.30h Municipality of Shkoder	Project presentation to the Institutional stakeholders	Municipality of Shkoder IPF10 Team and ESIA Experts	6+2 (+3)	• Project Presentation • Discussion on ESIA matters • Development projects in the project area • Communication channel with the municipality • Grievance mechanism	Meeting
18	20/01/2022, 12.00h Regional Administration of Protected Areas (RAPA)	Project presentation to the Institutional stakeholders	RAPA Manager	1 (+5)	• Project Presentation • Discussion on ESIA matters • Protected area boundaries • Exchange of materials	Meeting
Other consultation activities not registered elsewhere, but part of previous project development activities and WB14-REG-TRA-01						