

GEF SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM P175192

SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM -

ADDITIONAL FINANCING OF P168862

INTERNATIONAL SAVA RIVER BASIN COMMISSION

Draft

STAKEHOLDER ENGAGEMENT PLAN FOR REGIONAL ACTIVITIES IMPLEMENTED BY ISRBC

October 2021

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List of Definitions for Terms Used in This Document

CONSULTATION	The process of sharing information and getting feedback and/or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
ENVIRONMENTAL AND SOCIAL STANDARDS	The 10 Environmental and Social Standards (ESSs) set out the requirements that apply to all new World Bank investment project financing enabling the World Bank and the Borrower/Recipient to manage environmental and social risks of projects.
PAP	“Project Affected Person” is any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
PROJECT	Refers to the Part 4 of the GEF Sava and Drina River Corridors Integrated Development Program (P175192) (hereinafter: the Project), additional financing to the Sava and Drina River Corridors Integrated Development Program (P168862) (hereinafter: the Parent Project),
RECIPIENT	The International Sava River Basin Commission which shall implement the Project, including all measures and actions envisaged by this Stakeholder Engagement Plan.
STAKEHOLDERS	Refers to individuals or groups who: (a) are affected or likely to be affected by the project (<i>project-affected parties</i>); and (b) may have an interest in the project (<i>other interested parties</i>).
STAKEHOLDER ENGAGEMENT	A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, and reporting to stakeholders and management functions
STAKEHOLDER ENGAGEMENT PLAN	A plan which assists the Recipient to effectively engage with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.
VULNERABLE GROUPS	People, especially those below the poverty line, the landless, the elderly, women and children, or other displaced persons who may not be protected through national land compensation legislation, who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Abbreviations

ESF	Environmental and Social Framework
ESSs	Environmental and Social Standards (of World Bank)
ESS10	Stakeholder Engagement and Information Disclosure 10
EU	European Union
FASRB	Framework Agreement on the Sava River Basin
FBiH	Federation of Bosnia and Herzegovina
GEF	Global Environment Facility
GM	Grievance Mechanism
GRS	Grievance Redress System
ISRBC	International Sava River Basin Commission
M&E	Monitoring and Evaluation
OIPs	Other interested parties
PAP	Project Affected People
PIU	Project Implementation Unit
PMU	Project management Unit
RGD	Regional Grievance Desk
RPIU	Regional Project Implementation Unit
RTF	Regional Task Force
SDIP	Sava and Drina Rivers Corridors Integrated Development Program
SEP	Stakeholder Engagement Plan
SEL	Stakeholder Engagement Log
WB	World Bank

1 INTRODUCTION

This Stakeholder Engagement Plan (SEP) is an addition to already disclosed national SEPs for the Republic of Serbia, Bosnia and Herzegovina and Montenegro used for the parent project, i.e. the Sava and Drina Rivers Corridors Integrated Development Program Phase I (SDIP, P168862) project. The content of this additional finance was already included in the national SEPs as component 4. Activities under component 1 -3 of the parent project will be implemented by national PIUs, hence a decision was made to prepare a separate SEP for regional activities which will be implemented by the International Sava River Basin Commission (ISRBC). This version also contains an activity table which focuses on outreach activities targeted to component 4 which will fall under the purview of the regional Project Implementation Unit (RPIU) that is being set up under the ISRBC.

The development objective of the Sava and Drina Rivers Corridors Integrated Development Program is to improve flood protection and enable transboundary water cooperation in the Sava and Drina Rivers Corridors. The Project consists of four components, will be implemented over a period of 10 years, organized in two phases. The component 4 – regional activities will be managed by PIU under the ISRBC.

1.1 Objectives and Scope of this Stakeholder Engagement Plan

Pursuant to the World Bank requirements, stakeholder engagement is an inclusive process implemented throughout project life cycle, and it is most effective if launched at early stage of project development. Engagement should begin as early as possible at project preparation, as timely identification of and consultation with the stakeholders enable views and opinions of these groups to be taken into account in the project design and implementation.

Stakeholder engagement is continuous and iterative process through which the Recipient identifies, communicates and facilitates two-way dialogue with persons affected by project decision and activities, as well as with other stakeholders interested in the project. Different needs of various groups and individuals, particularly the disadvantaged and vulnerable ones, are taken into account.

In order to address adequately need of different groups, communication and information channels for all identified stakeholders are designed in line with their needs. Participatory process would be used to get comments and proposals for Project design, which may help improve the Project design and bring more advantages at local level.

Stakeholder requests, needs and expectations would be identified before Project design development, while PIU would be obliged to establish sustainable communication with stakeholder groups, namely to inform them regularly on the project and to report on potential changes.

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. The purpose of this SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with the regulations of ISRBC, as well as the requirements of the World Bank (WB) Environmental and Social Standards (ESSs). This SEP will facilitate regional activities which are key to strengthening strategic regional dialogue, joint planning and sustainable management and development of the shared water resources in the Sava and Drina River Basin, including building resilience to climatic shocks. These regional activities will be led by the Regional PIU which will be housed within the ISRBC to support implementation of regional activities, and in effect will be responsible for implementation of regional activities assigned under the Parent Project as Component 4.

The SEP shall be applicable to all activities planned under the Project in Phase I, while the adequacy of this SEP shall be assessed and updated as the case may be prior to commencement of Phase II. The stakeholder engagement will be an integral part of the project's environmental and social performance and project design and implementation.

The document comprises 11 Chapters. Chapter 1 introduces the Project and its objectives, followed by Chapter 2 listing the regulatory framework, which provides the framework for SEP in addition to the World Bank ESS10 presented in Chapter 3. A summary of stakeholder engagement held so far is presented in Chapter 4. Stakeholder identification, mapping and analysis are described in Chapter 5. The Stakeholder engagement activities are presented in Chapter 6. Implementation arrangements for implementing the SEP are presented in Chapter 7. Description of the Project's Grievance Mechanism (GM) follows in Chapter 8. Monitoring, documentation and reporting are presented in Chapter 9, disclosure and consultation requirements in Chapter 10, while the budget needed for implementation of the SEP is discussed in Chapter 11.

1.2 Brief Description the Project

1.2.1 Objectives

The Higher-level Objective of the Sava and Drina Rivers Corridors Integrated Development Program (SDIP) is to strengthen transboundary water cooperation and improve navigability and flood protection in the Sava and Drina Rivers Corridors.

The Development Objective of the SDIP (Phase 1 of the Program) is to improve flood protection and enable transboundary water cooperation in the Sava and Drina Rivers Corridors.

1.2.2 Components

ISRBC will implement Regional Activities under [Component 4 of the Parent Project](#). This component will support policy dialogue, consultations, preparation of plans and studies, and investments to strengthen the nexus between water services and connectivity with the regional development and economic cooperation objectives of the Sava and Drina Corridor. An advocacy and communication plan will be prepared and implemented to promote regional cooperation. Regional studies (i.e., hydrological, sediment, climate changes adaptation, etc.) in the Sava and Drina Rivers Corridors will improve the understanding of the Basin's unique characteristics and opportunities to boost regional cooperation and integrated management. Component 4 / Regional activities (US\$ 8 million, GEF Grant) is key to strengthening strategic regional dialogue, joint planning and sustainable management and development of the shared water resources in the Sava and Drina River Basin, including building resilience to climatic shocks. It will support policy dialogue, consultations, preparation of basin-wide plans and studies, and investments to strengthen the nexus between water services and development and economic cooperation objectives of the Sava and Drina Corridor. These activities are aligned with the World Bank's Green Resilient and Inclusive Development (GRID) approach to recovery and ECA's green transition priorities, especially on natural capital renewal and disaster and climate resilience. They are also aligned with the World Bank's COVID-19 approach paper, i.e. "strengthening policies, institutions, and investments for rebuilding better". This Component will finance the establishment including operations of the Regional Task Force (RTF) and Regional Project Implementation Unit (RPIU). The component will also allow for the preparation of key regional studies and plans that will further inform the design of the Program, including:

- Technical studies supporting the Sava River Basin management and filling the gaps in trans-boundary water management and planning processes, such as a hydrological study for the Sava River Basin, analysis of sediment, water and biota in the Sava River Basin, and a Climate Change Adaptation Strategy for the Sava River Basin;

- The Upgraded Sava River Basin Management Plan itself, building on the afore-mentioned studies and national River Basin Management Plans;
- Further water cooperation and corridor development studies and plans, such as a regional ecotourism strategy including nature-based solutions;
- Improvement in regional resilience management and forecasting, such as advanced flood and drought monitoring, forecasting and management systems;
- Regional collaboration advocacy and communication activities.

1.2.3 Regional Activities

The proposed SDIP components and sub-components that will be implemented by the RPIU housed by the ISRBC are briefly described in the table below. These regional activities were integrated in the parent Project's original design as well as its technical, economic and financial appraisal

Component	Sub-component	Sub-component description
Component 4: Regional activities	Regional Dialogues and Studies	<p>Policy dialogue, consultations, and the preparation of plans and studies for the Sava River basin.</p> <p>Preparation of an advocacy and communication campaign strengthening strategic regional dialogue, joint planning and sustainable management and development of the shared water resources in the Sava and Drina River Basin, including building resilience to climatic shocks.</p> <p>It will support policy dialogue, consultations, preparation of basin-wide plans and studies, and investments to strengthen the nexus between water services and development and economic cooperation objectives of the Sava and Drina Corridor. Promotion of joint action and decision making in river basin management and flood risk management among riparian countries, thus enhancing the climate adaptation capacity of the region.</p> <p>Technical studies supporting the Sava River Basin management and filling the gaps in trans-boundary water management and planning processes,</p> <p>Development of a Regional ecotourism strategy including nature-based solutions;</p> <p>Improvement in regional resilience management and forecasting, such as advanced flood and drought monitoring, forecasting and management systems</p>

1.2.4 Implementation arrangements at regional level

SDIP as the Parent Project will be implemented through a sequential and simultaneous multiphase programmatic approach with five participating countries: BiH, Republic of Croatia, Montenegro, Republic of Serbia and Republic of Slovenia. Croatia and Slovenia as the non-borrowing Project beneficiaries; will participate in the regional studies, regional dialogue, capacity building tools, and related activities in the frame of ISRBC, as the Parties to the

Framework Agreement on the Sava River Basin (hereinafter: FASRB). SDIP will be implemented by participating countries in a coordinated manner through two levels of coordination.

At the regional level, a regional Task Force (RTF) consisting of the existing ISRBC members and senior officials from key sectors such as water, transport, energy and tourism will facilitate dialogue and cooperation in the region, monitor, review and adjust overall program implementation, promote knowledge exchange and good practices. This RTF will also provide strategic oversight and guidance for the implementation of regional activities in addition to national subprojects, ensuring stronger dialogue, integration and knowledge sharing. During implementation, other sectors will be coopted as and when the need arises. Implementation of regional activities envisaged by the Project will be undertaken by the RPIU operating within the ISRBC. ISRBC has worked on World Bank-financed projects before (i.e. Joint Flood Management in Sava River Basin Project (P153325), consisting of the two components: Flood Risk Management Plan for the Sava River Basin, including Program of Measures and Flood Forecasting and Warning System of the Sava River basin), and has implemented EU Grants, and is considered well placed and experienced to handle implementation or use of the World Bank requirements including those arising from the relevance of the [Environmental and Social Framework](#) (hereinafter: ESF). To strengthen the implementation capacity the RPIU shall include an environmental and social specialist (on a permanent or ad hoc basis based on capacity and needs assessment) that will ensure the studies are prepared in line with the ESF. The E&S Specialist will also coordinate the implementation of this SEP.

1.2.5 Timeline and Budget for the Entire Project

The whole SDIP will be implemented over a period of 10 years, organized in two phases. Phase I will focus on flood protection and river basin management activities in the Sava and Drina Rivers Corridors. Phase II will build on Phase I and strengthen river port connectivity and environmental management. Countries will proceed to Phase II based on the readiness of jointly identified priority interventions prepared during Phase I. The estimated program cost for both phases is US\$338 million.

The activities under the Project will be financed by the GEF grant with a dedicated budget of US\$8 million.

2 REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

Bosnia and Herzegovina, Croatia, Serbia and Slovenia have entered into the FASRB on December 3, 2002. Under Article 3 the Parties shall cooperate on the basis of, and in accordance with, Directive 2000/60/EC of the EU Parliament and Council of October 23, 2000, Establishing a Framework for Community Activities in the Field of Water Policy (hereinafter: EU Water Framework Directive). Pursuant to Article 3 of this Agreement, the Parties shall, on a regular basis, exchange information on the water regime of the Sava River Basin, the regime of navigation, legislation, organizational structures, and administrative and technical practices.

3 WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARD ON STAKEHOLDER ENGAGEMENT

The World Bank has, in its ESF which became effective in October 2018, committed to taking the path that leads to sustainable development. The ESF specifies the mandatory requirements in the form of 10 standards that must apply.

One of those 10 standards is the [Stakeholder Engagement and Information Disclosure 10](#) (“ESS10”) which addresses stakeholder engagement. This standard recognizes the importance of open and transparent engagement between the Borrower/Recipient and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Objectives of ESS10 are the following:

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

According to the definition provided in the ESS10, “stakeholder” refers to individuals or groups who:

- Are affected or likely to be affected by the project (project-affected parties); and
- May have an interest in the project (other interested parties).

The standard contains a list of activities within the stakeholder engagement process which need to be implemented by the Borrowers/Recipients. The stakeholder engagement will involve the following:

- stakeholder identification and analysis;
- planning how the engagement with stakeholders will take place;
- disclosure of information;
- consultation with stakeholders;
- addressing and responding to grievances; and
- reporting to stakeholders.

ESS10 requires a Stakeholder Engagement Plan (SEP) is developed and implemented proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the views of stakeholders on the SEP shall be sought, including on the identification of stakeholders and the proposals for future engagement. The SEP shall be updated if significant changes are identified.

The SEP describes the timing and methods of and Borrower’s/Recipient’s engagement with stakeholders throughout the life-cycle of the project as agreed with the Bank, distinguishing between project-affected parties and other interested parties. The SEP also describes the range and timing of information to be communicated to project-

affected parties and other interested parties, as well as the type of information to be sought from them. According to ESS10 the information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs.

Borrowers/Recipients are required to develop within the SEP a procedure on addressing and responding to grievances (grievance mechanism to receive and facilitate resolution of PAPs concerns and grievances). It is required to implement the grievance mechanism and respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

4 PREVIOUS STAKEHOLDER ENGAGEMENT

The Parent Project's financial intervention is targeted towards flood protection, reconstruction of water infrastructure and facilities. The specific nature of the Parent Project yet leaning on to completed and on-going sector interventions within the water agenda required a broad engagement with various project stakeholders and is ongoing since early 2019. The specific stakeholder engagement activities that have taken place during the Parent Project preparation include:

- Numerous dialogues of WB with government agencies of the borrowing countries (BiH, Serbia and Montenegro) and local level;
- Detailed discussions of WB with relevant ministries and implementation agencies in each country, in joint meetings with stakeholders from multiple sectors including water, transportation, environment, and energy, and agreed to the completeness and readiness of the subproject list as well as the proposed implementation arrangements,
- Review of project preparation status with representatives from the responsible ministries and relevant agencies of the borrowing countries, including safeguard documentation,
- Meetings with the secretariat of the ISRBC on agreement regarding the regional activities and presentations of the status of the Parent Project development at the regular ISRBC sessions.

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

4.1 Lessons Learned on Stakeholder Engagement from Previous Flood Protection Projects

Previous World Bank support has been provided in a fragmented manner to the sector and mainly at national level without transboundary effects. The World Bank has been a long-standing partner in this region contributing immensely to the knowledge and decision support agenda. There has been extensive work covering a wide range of studies and policy dialogue activities, at different levels, with the Sava and Drina riparian countries, as well as technical assistance provision in different sectors, since 2007. However, these fragmented engagements failed to create the much needed enabling platform for collaborative sustainable management and development of the shared natural resources across the basin. Project visibility matters for uptake and adaptive design.

However, the World Bank provided the technical assistance for the abovementioned Joint Flood Management in Sava River Basin Project (P153325), that resulted in preparation of the joint Flood Risk Management Plan with the Program of Measures and the Flood Forecasting and Warning System of the Sava River basin, with participation of all five Sava countries under the coordination of ISRBC. This targeted support to joint efforts of the participating countries in flood management can be a good example how to achieve significant cross-border effects through well-structured transboundary projects.

For effective implementation, project activities need to be discussed with stakeholders at preparation and launch, lessons learned during implementation of each phase need to be shared.

5 ENGAGEMENT DURING PROJECT PREPARATION - STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Introduction

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

5.2 Stakeholder Identification and Mapping

Stakeholder mapping is done vertically (across the administrative space) and horizontally (within an individual space). The first step involves universal mapping. Each stakeholder group is rated for their relative importance and influence - starting from rating from 1 to 5, the weighting derived from cross-referencing interest and power of the stakeholders. The stakeholders of high (5*) and substantial significance (4*) are stakeholders to be included into all engagement activities and require continuous and undisrupted engagement. This helps in assigning importance for further analysis. The universal mapping, interest and the relative importance are presented below.

Table 1: Stakeholder Segmentation by their Areas of Influence¹

Stakeholders	Area of Influence	Significance
Regional level		
Meeting of the Parties to the FASRB	Meeting of the Parties to the FASRB keeps under continuous review the implementation of this FASRB on the basis of reports of the ISRBC, review its work and operations and make decisions on any additional action that may be required for the achievement of the purposes of the agreement.	*****
International Sava River Basin Commission (ISRBC)	Implements Regional Activities under Component 4 of the Parent Project. This component will support policy dialogue, consultations, preparation of plans and studies, and investments to strengthen the nexus between water services and connectivity with the regional development and economic cooperation objectives of the Sava and Drina Corridor. ISRBC will be responsible for support and facilitation of work of the RTF and for operation of the RPIU, to be established within the ISRBC.	*****
Regional Task Force (RTF)	RTF consisting of the existing ISRBC members and senior officials from key sectors such as water, transport, energy and tourism will facilitate dialogue and cooperation in the region, monitor, review and adjust overall program implementation, promote knowledge exchange and good practices. This RTF will also provide strategic oversight and	*****

¹ The weighting given to the stakeholders at the borrowing countries level is taken from national SEPs and does not necessarily represent their relevance to regional activities

Stakeholders	Area of Influence	Significance
	guidance for the implementation of regional activities in addition to national subprojects, ensuring stronger dialogue, integration and knowledge sharing.	
Regional Project Implementation Unit (RPIU)	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination of regional activities.	*****
Regional level media (Radio, TV, Newspapers, ISRBC's periodical bulletin SavaNewsFlash)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	****
Borrowing countries level		
BOSNIA AND HERZEGOVINA		
BiH State Level		
Ministry of Foreign Trade and Economic Relations (MoFTER)	Implementing agency for the Sava and Drina Rivers Corridor Integrated Development Program and Main counterpart of the WB for Project implementation at BiH level	****
BiH Entity level		
Federation of BiH		
FBiH PIU housed by the Federal Ministry of Agriculture, Water Management and Forestry (FMAWMF)	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination, and procurement and financial management activities in FBiH	*****
Federal Ministry of Finance	Loan oversight at FBiH level	*****
Federal Ministry of Transport and Communications	Provision of technical support to FBiH PIU	****
Federal Ministry of Environment and Tourism	Main authority for environmental protection and environmental permitting at the FBiH level	*****
Federal Ministry of Spatial Planning	Main authority for spatial planning and construction permitting at the FBiH level	*****
Sava River Watershed Agency	Provision of technical support to PIU, and issuance of water permitting at FBiH level	*****
Cantonal ministries for water management	Water permitting at Cantonal level	*****
Cantonal ministries for environmental protection and spatial planning	Environmental and construction permitting at Cantonal level	*****
FBiH level media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	****
Republika Srpska		
RS PIU housed by the Ministry of Agriculture, Forestry and Water Management (MAFWM)	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination in RS	
Ministry of Finance	Loan oversight at RS level	*****
Ministry of Transport and Communications	Provision of technical support to RS PIU	****
Ministry of Spatial Planning, Construction and Ecology	Provision of technical support to RS PIU, main authority for environmental protection, spatial planning and environmental and construction permitting	*****
Agriculture Project Coordination Unit (APCU) housed by the Ministry of Agriculture, Forestry and Water Management	Procurement and financial management activities in RS	*****

Stakeholders	Area of Influence	Significance
Public Institution "Vode Srpske"	Provision of technical support to RS PIU and main authority for water permitting	*****
RS level media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	*****
Brcko District level		
BD PIU hosted by the Government of BD	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination, and Procurement and financial management activities in BD BiH	*****
Directorate for Finance	Loan oversight at BD BiH level	*****
Department of Spatial Planning and Property Affairs	Main authority for environmental protection, spatial planning and environmental and urban permitting	*****
Department of Public Safety	Main authority for construction and use permitting	*****
Department for Agriculture, Forestry and Water Management	Main authority for water management and water permitting	*****
BD level media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	*****
Local and Community Level		
People affected by land acquisition	Affected by loss of assets attributable to the implementation needs of the Sub-projects	*****
People residing in the project areas	Individuals and household likely to observe changes from the environmental and social impacts of the Sub-Projects during their implementation stemming from civil works These PAPs are likely to be affected by disturbances caused by the Project's heavy vehicles traffic, construction impacts, etc., but may also benefit from project-related employment opportunities.	*****
Local Governments (Municipalities and Cities - including line departments: land management, economic development, environment, and Local Communities)	Serve as first point of contact, conduct field outreach, disseminate project related materials, facilitate public meetings and consultations, liaison between targeted groups and PIUs. Administratively manage the land acquisition process. Responsible for Sub-Project GM set up, management and monitoring.	*****
SERBIA		
Ministry of Agriculture Forestry and Water Management (MAFWM)	Main counterpart of the Parent Project implementation of Component 1-3	*****
Ministry of Construction, Transport, and Infrastructure (MCTI)	Main counterpart of the Parent Project implementation for component related to inland waterway	*****
Ministry of environmental protection at National level	Main authority for environmental protection and permitting	*****
PMU housed by the Directorate for Water within the MAFWM	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination	*****
Public Water Management Company (PWMC) "Srbijavode"	Main authority for water management in Serbia (except the AP Vojvodina)	*****
PWMC "Vode Vojvodine"	Main authority for water management the level of the Autonomous Province of Vojvodina	*****
National media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	*****

Stakeholders	Area of Influence	Significance
Local and Community Level		
People affected by land acquisition	Affected by loss of assets attributable to the implementation needs of the Sub-projects	*****
People residing in the project areas	Individuals and household likely to observe changes from the environmental and social impacts of the Sub-Projects during their implementation stemming from civil works These PAPs are likely to be affected by disturbances caused by the Project's heavy vehicles traffic, construction impacts, etc., but may also benefit from project-related employment opportunities.	*****
Local Governments (including line departments: land management, economic development, environment, Mesne zajednice)	Serve as first point of contact, conduct field outreach, disseminate project related materials, facilitate public meetings and consultations, liaison between targeted groups and MAFWM /PMU. Administratively manage the land acquisition process. Responsible for Sub-Project GM set up, management and monitoring.	*****
Local media (radio, TV, Newspaper)	Enable wide and regular dissemination of information related to the Project to ensure its visibility, facilitate stakeholder engagement on the local level, regional and national level.	*****
Education and research institutions, community organizations	Provide knowledge and research on the latest developments in the agricultural sector.	***
Low-skilled, semi-skilled and high-skilled workers	Positive externalities beneficiaries through potential employment.	***
MONTENEGRO		
Ministry of Agriculture and Rural Development	Main counterpart of the WB for Project implementation of Component 1-3	*****
Ministry for Sustainable Development and Tourism	Main authority for environmental protection and construction permitting	*****
Nature and Environmental Protection Agency	Main authority for review of EIA and environmental permitting	*****
PIU housed by the Ministry of Agriculture and Rural Development	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination	*****
Ministry of Finance's Technical Service Unit (TSU)	Procurement and financial management activities	*****
Water Administration	Main authority for water management and water permitting	*****
National media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	****
Social media (Twitter, Facebook etc.)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	****
Local and Community Level		
People affected by land acquisition	Affected by loss of assets attributable to the implementation needs of the Sub-projects	*****
People residing in the project areas	Individuals and household likely to observe changes from the environmental and social impacts of the Sub-Projects during their implementation stemming from civil works These PAPs are likely to be affected by disturbances caused by the Project's heavy vehicles traffic, construction impacts, etc., but may also benefit from project-related employment opportunities.	*****
Local Governments (Municipalities - including line departments: land management, economic	Serve as first point of contact, conduct field outreach, disseminate project related materials, facilitate public meetings and consultations, liaison between targeted groups and MARD MNE/PIU.	*****

Stakeholders	Area of Influence	Significance
development, environment, and Local Communities)	Administratively manage the land acquisition process. Responsible for Sub-Project GM set up, management and monitoring.	
Local media (radio, TV, Newspaper)	Enable wide and regular dissemination of information related to the Project to ensure its visibility, facilitate stakeholder engagement on the local level, regional and national level	*****
Education and research institutions, community organizations	Provide knowledge and research on the latest developments in the agricultural sector	***

5.3 Disadvantaged/ Vulnerable Individuals and Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. Such groups are also more likely to be excluded from the consultation process.

The project area includes villages often affected by floods in the recent past and are classified as vulnerable due to flood risks. Additional disadvantaged / vulnerable individuals or groups in the project area include “low-income households; women; youth; women-headed households; elder-headed households (\geq pension age) without any other household member bringing in income; persons with limited mobility; or persons with disabilities; Roma groups, individuals and habitat communities, migrants and refugees. Various types of barriers may influence the capacity of such groups to articulate their concerns and priorities about project impacts. For each Sub-Project a vulnerability assessment will be conducted as part of the project preparation and shall inform both the Resettlement Plan if needed and the need to adapt the engagement methods and approaches as designed in this SEP to bridge any engagement barriers stemming from vulnerability.

5.4 Stakeholder Analysis

The stakeholders of high and substantial significance (ranked 5* and 4* during universal mapping) are analyzed in the Table below. The analysis includes the current status of the stakeholder, concerns and issues raised during consultations, their expectations from the project, significance of the risk of unmet expectations and enabling conditions required to mitigate those risks. The stakeholder risk is moderate due to the need to coordinate with multiple stakeholders throughout the Project period.

Table 2: Stakeholder Analysis by the Level of Engagement

Subgroup ²	Current Status	Concerns and issues	Expectations	Risks	Enabling Qualifiers
Regional level					
World Bank	Loan Approval for the Parent Project, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives	Implementation readiness, effectiveness and disbursement delays	Meeting the timelines for Project Approval and implementation in line with goals as set forth in the Project documents.	Low	Approval of Loan, Project Operations Manual and Other project specific documents prepared by the Borrower/Recipient i.e. PIUs
ISRBC	Main counterpart of the WB for Project and responsible for regional level coordination and activities	Regional PIU to be adequately staffed to manage regional activities and for regional level coordination	Maintain institutional capacity in implementing Global Environment Facility (GEF) funded component, hiring competent staff to manage the project at all levels	Moderate	Within ISRBC secretariat, a regional PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E.
Borrowing countries level					
Bosnia and Herzegovina, Serbia and Montenegro					
As provided for in the national SEPs for which the <i>Stakeholder Analysis by the Level of Engagement</i> is given in Annex B					

²Sub-groups at local and community level are not exclusive and may have multiple overlaps (e.g. young women agri-food producers who lives in a disadvantaged area would receive extra points in the selection criteria for all three characteristics (gender, age and location)).

5.5 Gender Analysis, Actions and Indicators

The Projects proposed interventions will not deliver their intended economic and social returns in full unless all members of the target populations and end-user beneficiaries, irrespective of gender, can participate in the decision-making process and access improved facilities. The sub-project consultation will actively involve community members, irrespective of gender, to ensure effective public participation. At the same time, enterprise surveys have shown that women-headed businesses incur higher logistics costs than male-headed businesses. The nature of this gap as it relates to the Sava River Basin will be further explored during Phase 2 preparation, to better understand the needs and risk exposure of women-headed businesses and to promote interaction between these businesses and the authorities of the Sava and Drina corridors.

The Project will promote access to employment and service provision opportunities. On the objective area of supporting development of more efficient land and property markets it is noted that properties are almost invariably registered to males, making it difficult for female household members to participate in the benefit sharing and decision making related to displacement. The project Development Indicators (PDIs) include the number of people benefiting from enhanced flood protection measures disaggregated by gender.

5.6 Stakeholder Expansion

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

Table3:Expansion and update questionnaire

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

5.7 Planned Stakeholder Engagement Activities

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the Project: strengthening strategic regional dialogue, joint planning and sustainable management and development of the shared water resources in the Sava and Drina River Basin, including building resilience to climatic shocks

For a more detailed explanation of the stakeholder engagement methods to be used, please refer to the Chapter 6 of this SEP.

Table 4: Summary of proposed strategy for consultation

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
<p>REGIONAL ACTIVITIES</p>	<ul style="list-style-type: none"> ▪ National key stakeholders in the borrowing countries (BiH, Serbia and Montenegro) ▪ National key stakeholders in other Parties to the FASRB (Croatia and Slovenia) ▪ Members of the ISRBC ▪ Members of the permanent and ad hoc ISRBC expert groups 	<ul style="list-style-type: none"> ▪ prioritization, design, timing, funding, and execution approaches of activities that require consensus ▪ re-alignments in policy decision-making ▪ information sharing ▪ coordination on social and environment studies and strategies ▪ monitoring project progress, review and adjust overall program implementation, promote knowledge exchange and good practices ▪ discussion, feedback, and deliberation at the regional level ▪ Reach joint decisions for preparation of key regional studies and plans ▪ Building political confidence ▪ Plan activities avoiding decision-making delays and undermining the collaborative process essential for the achievement of the PDO ▪ Conduction regional studies 	<ul style="list-style-type: none"> ▪ Regional Workshops ▪ Regular meetings of the permanent and ad hoc ISRBC expert groups ▪ Meetings with national key stakeholders as needed ▪ Regional collaboration advocacy, stakeholder engagement and communication activities. ▪ Communication with national PIU as needed ▪ Advocacy and communication plan to facilitate partnerships between participating countries to stimulate knowledge sharing and capacity building while implementing activities related to regional dialogue and studies 	<ul style="list-style-type: none"> ▪ On a rotation basis in each of the countries involved in the First Phase of the program (i.e. BiH, MNE and Serbia) ▪ Seat of the ISRBC in Zagreb ▪ Due to COVID -19 restrictions virtual meetings, events and forums at first ▪ Offline meetings, communication in an ongoing and continuous manner ▪ In line with the Advocacy and communication plan to be developed. The frequency will be further adapted to provide granulated frequency details. 	<ul style="list-style-type: none"> ▪ ISRBC PIU under the Secretariat respectively

6 STAKEHOLDER ENGAGEMENT ACTIVITIES

Various stakeholder engagement activities are proposed to ensure awareness and meaningful consultations about Project activities. The outreach and stakeholder engagement will be gender appropriate. Targeted messaging will encourage the participation of women, those living in areas with risks from flooding and highlight Project characteristics that are designed to respond to their needs and increase their access to Project benefits.

6.1 Details on Engagement Methods to Be Used

6.1.1 Project Outreach Methods

Once each of the regional activities mature, the RPIU will organize project launch meetings. Such engagement will then continue prior to any new activity within the regional component. To succeed in effective outreach the RPIU will rely on the already established communication channels of ISRBC and on the support from national PIUs and their institutional and social network, if needed. Launch meetings shall be the first step in the Sub-Project preparatory activities. The Project will include targeted outreach to women and disadvantaged groups ahead of these meetings to ensure their integration in the engagement activities.

6.1.2 Mass/Social Media Communication

The RPIU shall engage an Environmental and Social expert who shall be inter alia responsible to assist the PIUs in disclosure, dissemination of information and communication with the key regional stakeholders. The media for communication shall be as seen fit for each activity, taking into consideration the type and sensitivity of stakeholders. Also National media shall be engaged to help with wider dissemination and publicity of the activities as they are prepared.

6.1.3 Communication Materials

The main exchange of communication materials will be via written correspondence between the RPIU and national PIUs. These will include notification of planned studies, progress in implementation and advice or concurrence seeking matters. Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. The website will be also regularly updated (at least on a quarterly basis) with key Project updates and reports on the Project's environmental and social performance both in English and all languages use under the Statute of the ISRBC. The websites will also provide information about the grievance mechanism for the project (see next sub-section).

6.1.4 Grievance Mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism (GM) will be set-up for the Project. Dedicated communication materials (GM pamphlets, posters) will be created to help stakeholders to familiarize themselves with the grievance redress channels and procedures. A GM guidebook/manual will also be developed. In order to capture and track grievances received under the Project, a dedicated GM Management Information System/database is planned. The RPIU's website will include clear information on how feedback, questions, comments, concerns, and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GM committee works, both in terms of process and deadlines.

6.1.5 Regional cooperation

Advocacy and communication plans to facilitate partnerships between participating countries to stimulate knowledge sharing and capacity building while implementing activities related to regional dialogue and studies will be prepared and utilized in addition to the mainstream methods. Joint progress monitoring meeting bringing together national stakeholders to monitor project progress, review and adjust overall program implementation, promote knowledge exchange and good practices will be held regularly. Discussion panels to promote joint action and decision making in river basin management and flood risk management among riparian countries will be utilized. Knowledge sharing workshops will facilitate good communication provide an opportunity to integrate views and concerns at early stages.

The RTF and RPIU, tasked to bring together the national stakeholders to monitor project progress, review and adjust overall program implementation, promote knowledge exchange and good practices will take the lead in the promotion of joint actions and decision makings by setting up a timetable of regular meetings during which the technical studies supporting the Sava River Basin management and filling the gaps in trans-boundary water management and planning processes, such as a hydrological study for the Sava River Basin, analysis of sediment, water and biota in the Sava River Basin, and a Climate Change Adaptation Strategy for the Sava River Basin, will be discussed. Also the upgrade of the Sava River Basin Management Plan shall be on the agenda of the RTF meetings. The meetings shall facilitate exchange of progress, information, identify any bottlenecks in communication or action, identify delays in decision makings and identify the root cause and take actions to remedy these.

6.2 Information Disclosure

The website of the ISRCB will be used: <https://www.savacommission.org/>, where all the Project reports, news, announcements, updates etc. shall be disclosed (including news on relevant environmental and social data). Details about the Project GM will be posted on the ISRBC website including the electronic grievance submission form that will also be made available on the same website.

6.3 Stakeholder Engagement Log

The RPIUs will maintain and disclose a Stakeholder Engagement Log (SEL) as documented record of all stakeholder engagement activities, including group and individual meetings, planned or spontaneous meetings, formal or informal, phone conversations, written exchanges etc. Each log entry shall contain details of stakeholders engaged, date, time and place of meeting/method of communication, short description of the topics discussed, information gathered, a summary of the feedback received, if any, and a brief explanation of how the feedback was taken into account, or the reasons why it was not. The log may be supported by multimedia (photo, video) records of the meetings if available, and written documents that were discussed or issued in relations to the engagement.

The SEL will be a valuable tool providing an overview of key engagement phases, and actions within, facilitating monitoring of SEP.

The SEL shall be managed by the Environmental and Social Specialist of the RPIU.

6.4 Transboundary Communication

The Higher-level Objective of the SDIP is to facilitate integrated transboundary water resources management and development along the Sava and Drina Rivers Corridors. The cooperating riparian countries will agree on the steps leading to a Platform for transboundary collaboration established /operational.

7 IMPLEMENTATION ARRANGEMENTS AND INSTITUTIONAL ANALYSIS FOR STAKEHOLDER ENGAGEMENT

7.1 Project Enabling Efforts from Lessons Learned

The Project recognizes that the stakeholder profile is quite diverse and that the stakeholders' expectations and orientation as well as capacity to interface with the Project might be different. The Project design and institutional arrangements have been drawn such as to enable mitigation of social exclusion risks and come up with types of activities and approaches to address the likely impediments arising the reform. This Project will be based on the early engagement and maintenance of dialog as a role model overall and in engagement with wide variety of stakeholders during preparation and in the course of its implementation.

7.2 Roles and Responsibilities

Stakeholder engagement will be coordinated and led by the RPIU hosted within the ISRBC. The RPIU will closely coordinate with other key stakeholders.

Table5: Responsibilities of key stakeholders in SEP Implementation

STAKEHOLDER	RESPONSIBILITIES
ISRBC RPIU	<ul style="list-style-type: none"> ▪ Plan, implement and monitor SEP activities at regional level; ▪ Lead, coordinate and conduct regional stakeholder engagement activities; ▪ Collect stakeholder feedback through regional workshops, satisfaction surveys and bilateral meetings; ▪ Manage the GM at regional level, communicate grievances regularly through monitoring reports; ▪ Manage regional GM database and submit quarterly reports on the substance and quantity of grievances; ▪ Organize and hold annual multi-national stakeholder workshops, in collaboration with national PIUs; ▪ Regular regional meetings with all national key stakeholders through RTF; ▪ Regional advocacy for the project; ▪ Provide on side advise on regional matters; ▪ Regional communication activities; ▪ Communicate with national PIUs as needed; ▪ Facilitate timely exchange of information and decision-making processes; ▪ Provide input and implement the Advocacy and communication plan to facilitate partnerships between participating countries to stimulate knowledge sharing and capacity building while implementing activities related to regional dialogue and studies; ▪ Coordinate with national key stakeholders on issues related to regional activities through RTF in matters related to decision making; ▪ Keep engage with national PIUs responsible for implementation of the Parent Project ▪ Foster regional dialogue.

8 GRIEVANCE MECHANISM

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

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

Regional GM will consist of a Regional Grievance Desk (RGD) established and administered by the ISRBC.

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

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

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

The RGD shall be developed and operational immediately after appraisal of the Project and shall have representation from both RPIU and national PIUs while the administration and management will lie within the responsibility of the ISRBC and the PIUs correspondingly.

However, the grievance mechanism for project workers required under ESS2 will be provided separately.

ISRBC is responsible for establishing functioning GM and informing stakeholders about the GM role and function related to the Project, the contact persons and the procedures to submit a complaint in the affected areas. Information on the GM will be available:

- on the website of the ISRBC (<https://www.savacommission.org/>)
- through social media campaigns,
- through regional communication campaigns.

8.1 Raising Grievances

Effective grievance administration strongly relies on a set fundamental principle designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective, easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the GM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined. The access points shall be publicized and shall be part of the awareness building.

8.2 Grievances Administration

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

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

Nothing in or relating to GM shall be deemed a waiver of any of the privileges and immunities of the ISRBC as the international organization.

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

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

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

The regional GM shall have bi-annual exchange of information to avoid same concerns that might have been raised through the regional GRM and national GMs to be conflictingly resolved.

8.3 Grievance and Beneficiary Feedback Reporting

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

8.4 Grievance Log

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

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

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

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

8.5 Grievance Admission Channels

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

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

	<p>International Sava River Basin Commission Kneza Branimira 29/II 10000 Zagreb</p> <p>tel: +385 1 4886960 fax: +385 1 4886986</p> <p>e-mail: isrbc@savacommission.org</p>

8.6 Monitoring and Reporting on Grievances

The RGD will be responsible for:

- Maintaining the grievance logs on the complaints received at the regional level;
- Disclosing quarterly reports on GM mechanisms;
- Collecting, summarizing and analyzing the data on the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them.

The monitoring reports to the WB shall be submitted through the RPIUs, which shall include a section related to GM which provides updated information on the following:

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

8.7 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate GRS, please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

Addresses to send complaints:

Email: grievances@worldbank.org

Fax: +1-202-614-7313

Mail address:

The World Bank Grievance Redress Service (GRS)

MSN MC 10-1018, 1818 H St NW

Washington, DC 20433, USA

9 SEP MONITORING AND REPORTING

The RPIU will document and communicate the progress and results of the Project, including monitoring of the SEP. The RPIU will be responsible for overall compilation of progress and results. Feedback and grievances received through the Project GM will be aggregated and included in the social progress monitoring reports and other report at frequency as required by the WB.

9.1 Monitoring Reports during Implementation of Activities

Monitoring reports documenting the environmental and social performance of the Project during implementation of the activities shall be the primary responsibility of the RPIU assisted by the E&S Specialist. These reports will include a section regarding stakeholder engagement and grievance management. Table 6 proposes a comprehensive set of indicators related to SEP performance at this stage. The achievement of indicators shall rely on information from the SEL.

Table 6: SEP Indicators to be documented in Progress Reports

REGIONAL ENGAGEMENT ACTIVITIES
Number of annual multi-national stakeholder workshops held
Number of regional regular working meetings held over the reporting period
Number of studies completed in joint collaboration of all national stakeholders
GRIEVANCE RESOLUTION MECHANISM
Number of regional grievances received, responded and resolved within an agreed time frame
Number of grievances received, in total and at the local level, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of RGD meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report)
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods

9.2 Reporting Frequency

During the Project development and implementation phase, the Social and Environmental Specialist will prepare quarterly reports on E&S performance for the WB which will include an update on implementation of the SEP and include indicators as designed in Table 6. Quarterly reports will be used to develop annual reports reviewed. The quarterly and annual reports will be disclosed on the Project website and made available to the interested public.

9.3 Involvement of Stakeholders in Monitoring Activities

The Project provides several opportunities to stakeholders, to monitor certain aspects of Project performance and provide feedback. RGD will facilitate a National Stakeholder survey at the project mid-point and end stages to allow feedback on stakeholder engagement and project performance.

9.4 Reporting Back to Stakeholder Groups

The RPIU housed under the ISRBC will use the engagement methods outlined in this SEP also as feedback avenues.

10 DISCLOSURE AND CONSULTATION REQUIREMENTS

In compliance with the WB standard on Stakeholder Engagement and Information Disclosure 10 (“ESS10”) this SEP document guiding the Regional Stakeholder Engagement Activities shall be disclosed and in public domain for 15 days followed by public consultations.

11 ESTIMATED BUDGET

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

The Budget for implementation of the activities attributable to the Project have been secured under the Grant.

Annex A. Project Grievance Form

SAVA AND DRINA RIVERS CORRIDORS INTEGRATED DEVELOPMENT PROJECT

Project Grievance Form

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

Signature: _____

Date: _____

Please send this Form to the following address:

International Sava River Basin Commission
 Kneza Branimira 29/II
 10000 Zagreb
 e-mail: isrbc@savacommission.org

Annex B. Borrowing countries' Stakeholder Analysis by the Level of Engagement

Subgroup ³	Current Status	Concerns and issues	Expectations	Risks	Enabling Qualifiers
BOSNIA AND HERZEGOVINA					
BiH State Level					
Ministry of Foreign Trade and Economic Relations (MoFTER)	Experienced in overseeing WB flooding project implementation	MoFTER to be adequately staffed to oversight and follow large-scale projects and subprojects with ESF	Maintain institutional capacity in following and overseeing the World Bank funded project in the flood protection and prevention sector, hiring competent staff to coordinate the project at all levels	Low	Within MoFTER relevant expertise in staff in project oversight and coordination, capacity building for MoFTER throughout Project implementation
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives	Implementation readiness, effectiveness and disbursement delays	Meeting the timelines for Project Approval and implementation in line with goals as set forth in the Project documents.	Low	Approval of Loan, Project Operations Manual and Other project specific documents prepared by the Borrower i.e. PIUs
ISRBC	Main counterpart of the WB for Project implementation of Component 4 and responsible for regional level coordination and activities	Regional PIU to be adequately staffed to manage activities under Component 4 and for regional level coordination and activities	Maintain institutional capacity in implementing Global Environment Facility (GEF) funded component, hiring competent staff to manage the project at all levels	Moderate	Within ISRBC secretariat, a regional PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E.
Ministry of Finance and Treasury	BiH budget financial management, inclusion of BiH guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the BiH guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance
FBiH Level					
FMAWMF/FBiH PIU	Has experience in WB projects and is experienced in implementing the WB ESF	PIU to be adequately staffed to manage large-scale projects	Maintain institutional capacity in implementing World Bank funded project in the flood protection and prevention sector, hiring	Moderate	Within FMAWMF a PIU with relevant expertise in staff in project management, procurement, financial management, environmental and

³Sub-groups at local and community level are not exclusive and may have multiple overlaps (e.g. young women agri-food producers who lives in a disadvantaged area would receive extra points in the selection criteria for all three characteristics (gender, age and location)).

	Procurement and financial management activities housed in FMAWMF, experience in implementing WB financed Projects	and subprojects with ESF. Potentially insufficient number of staff to manage multiple WB Projects	competent staff to manage the project at all levels Establish and maintain excellent communication and coordination with other relevant stakeholders	Moderate	social safeguards, M&E, capacity building for FMAWMF/PIU throughout Project implementation Project will strengthen FMAWMF capacity by hiring fiduciary staff as needed additional
Federal Ministry of Finance	FBiH budget financial management, inclusion of FBiH guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the FBiH guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance
Federal Ministry of Environment and Tourism	Experienced in environmental permitting and EIA procedures at FBiH level	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Federal Ministry of Spatial Planning	Experienced in construction permitting at FBiH level	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Sava River Watershed Agency	Experienced in water permitting at FBiH level	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Cantonal ministries for water management	Experienced in water permitting at Cantonal level	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Cantonal ministries for environmental protection and spatial planning	Experienced in environmental and construction permitting at Cantonal level	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
RS Level					

RS PIU housed by the Ministry of Agriculture, Forestry and Water Management (MAFWM)	Has experience in WB projects and is experienced in implementing the WB ESF	PIU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Maintain institutional capacity in implementing World Bank funded project in the flood protection and prevention sector, hiring competent staff to manage the project at all levels	Moderate	Within MAFWM a PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for MAFWM/PIU throughout Project implementation
Ministry of Finance	RS budget financial management, inclusion of RS guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the RS guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance
Ministry of Spatial Planning, Construction and Ecology	Experienced in environmental and construction permitting	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Public Institution "Vode Srpske"	Experienced in water permitting	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Agriculture Project Coordination Unit (APCU) housed by the MAFWM RS	Procurement and financial management activities housed in APCU, experience in implementing WB financed Projects	Potentially insufficient number of staff to manage multiple WB Projects	Establish and maintain excellent communication and coordination with MAFWMRS/PIU and other relevant stakeholders	Moderate	Project will strengthen APCU capacity by hiring fiduciary staff as needed additional
BD Level					
BD BiH PIU hosted by the Government of BD BiH	Has no experience in WB projects and in implementing the WB ESF	PIU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Maintain institutional capacity in implementing World Bank funded project in the flood protection and prevention sector, hiring competent staff to manage the project at all levels	Moderate	Within Government of BD BiH a PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for Government of BD BiH /PIU throughout Project implementation
Directorate for Finance	BD BiH budget financial management, inclusion of BD BiH guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the RS guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance

Department of Spatial Planning and Property Affairs	Experienced in environmental and urban permitting	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Department of Public Safety	Experienced in construction and use permitting	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Local and Community Level					
Local Governments (Municipalities and Cities - including line departments: land management, economic development, environment, and Local Communities)	Variable experience in WB projects in implementing the WB ESF	Adequate and timely response to requests for implementation of measures designed in the ESMF, SEP RPF, RP etc.	Maintain excellent communication and coordination with PIUs	Moderate	Timely commencement of engagement and integration into the Project processes by the PIUs
SERBIA					
National level					
Ministry of Finance (MoF)	State budget financial management, inclusion of state guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the state guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives	Implementation readiness, effectiveness and disbursement delays	Meeting the timelines for Project Approval and implementation in line with goals as set forth in the Project documents.	Low	Approval of Loan, Project Operations Manual and Other project specific documents prepared by the Borrower i.e. PMU

ISRBC	Main counterpart of the WB for Project implementation of Component 4 and responsible for regional level coordination and activities	Regional PIU to be adequately staffed to manage activities under Component 4 and for regional level coordination and activities	Maintain institutional capacity in implementing Global Environment Facility (GEF) funded component, hiring competent staff to manage the project at all levels	Moderate	Within ISRBC secretariat, a regional PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E.
MAFWM/PMU	Has experience in WB projects including flood protection Projects and is experienced in implementing the WB ESF	PMU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Maintain institutional capacity in implementing World Bank funded project in the flood protection and prevention sector, hiring competent staff to manage the project at all levels	Moderate	Within MAFWM a PMU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for MAFWM/PMU throughout Project implementation
MCTI/PMU	Has experience in WB projects and is experienced in implementing the WB ESF	PMU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Adequate institutional capacities in implementing World Bank funded project in the, hiring competent staff to manage the project at all levels	Moderate	Within MCTI a PMU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for MCTI/PMU throughout Project implementation
Ministry of Environmental Protection	Experienced in permitting and EIA procedures	Delays in issuing permits due to changes after elections	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Reasonable time for appointment of new Government
Provincial Secretariat for Urban Planning and Environmental Protection of Vojvodina	Experienced in permitting and EIA procedures	Delays in issuing permits due to changes after elections	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Reasonable time for appointment of new Government
CFU in the Ministry of Finance	Procurement and financial management activities housed in CFU, experience in implementing WB financed Projects	Potentially insufficient number of staff to manage multiple WB Projects	Establish and maintain excellent communication and coordination with MAFWM/PMU and MCTI/PMU and other relevant stakeholders	Moderate	Project will strengthen CFU capacity by hiring additional fiduciary staff as needed
Community Level					

Local Governments (including line departments: land management, economic development, environment, Mesne zajednice)	Variable experience in WB projects in implementing the WB ESF	Adequate and timely response to requests for implementation of measures designed in the ESMF, SEP RPF, RP etc.	maintain excellent communication and coordination with MAFWM/PMU	Moderate	Timely commencement of engagement and integration into the Project processes by the MFWM /PMU
MONTENEGRO					
National Level					
Ministry of Finance	State budget financial management, inclusion of state guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the state guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives	Implementation readiness, effectiveness and disbursement delays	Meeting the timelines for Project Approval and implementation in line with goals as set forth in the Project documents.	Low	Approval of Loan, Project Operations Manual and Other project specific documents prepared by the Borrower i.e. PIU
ISRBC	Main counterpart of the WB for Project implementation of Component 4	Regional PIU to be adequately staffed to manage activities under Component 4	Maintain institutional capacity in implementing Global Environment Facility (GEF) funded component, hiring competent staff to manage the project at all levels	Moderate	Within ISRBC secretariat, a regional PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E.
MARD MNE/PIU	Has experience in WB projects and is experienced in implementing the WB ESF	PIU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Maintain institutional capacity in implementing World Bank funded project in the flood protection and prevention sector, hiring competent staff to manage the project at all levels	Moderate	Within MARD MNE a PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for MARD MNE/PIU throughout Project implementation
Ministry for Sustainable Development and Tourism	Experienced in construction permitting	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance

Nature and Environmental Protection Agency	Experienced in environmental permitting and EIA procedures	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Water Administration	Experienced in water permitting and water management	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Ministry of Finance’s Technical Service Unit (TSU)	Procurement and financial management activities housed in TSU, experience in implementing WB financed Projects	Potentially insufficient number of staff to manage multiple WB Projects	Establish and maintain excellent communication and coordination with MARD MNE/PIU and other relevant stakeholders	Moderate	Project will strengthen TSU capacity by hiring fiduciary staff as needed additional
Local and Community Level					
Local Governments (Municipalities - including line departments: land management, economic development, environment, and Local Communities)	Variable experience in WB projects in implementing the WB ESF	Adequate and timely response to requests for implementation of measures designed in the ESMF, SEP RPF, RP etc.	Maintain excellent communication and coordination with MARD MNE/PIU	Moderate	Timely commencement of engagement and integration into the Project processes by the MARD MNE/PIU