

**DRAFT**

Moldova Water Security and Sanitation Project  
(P173076)  
Stakeholder Engagement Plan (SEP)

February 2021

## Table of Contents

ABBREVIATIONS AND ACRONYMS .....	3
GLOSSARY OF KEY TERMS.....	4
1. INTRODUCTION .....	5
1.1. Project Background .....	5
1.2. Project description .....	5
1.2.1 Project Objective .....	5
1.2.2. Project Components.....	6
1.3. Purpose and objectives of SEP .....	8
1.4. Principles of Effective Stakeholder Engagement.....	9
2. REGULATORY CONTEXT .....	9
2.1. Legislation of the Republic of Moldova .....	9
2.2. World Bank Requirements.....	11
2.3 Gap Analysis between National Legislation and World Bank .....	12
3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES.....	13
4. STAKEHOLDER IDENTIFICATION AND ANALYSIS.....	17
4.1. Identification of Stakeholders.....	17
4.2. Stakeholder Interest and Influence .....	20
5. STAKEHOLDER ENGAGEMENT PROGRAM .....	21
5.1 Engagement Methods to be Used .....	21
5.2 Stakeholder Engagement Plan .....	22
5.3 Proposed Information Disclosure Approach.....	30
6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES .....	34
7. GRIEVANCE REDRESS MECHANISM .....	35
7.1 Objective of the GRM Mechanism.....	35
7.2 Grievance Investigation and Resolution Process .....	35
7.3 Grievance Log .....	37
7.4 Awareness Building .....	38
7.5 Roles and Responsibilities for GRM.....	38
7.6 Monitoring and reporting on GRM implementation .....	39
REFERENCES .....	40
Annex.1 Structure of the field research, Gender Gap and Citizen Engagement Analysis.	41
Annex.2 Consultations for MWSSP .....	42
Annex.3 Summary of the virtual stakeholder consultations.....	44
Annex.4 Grievance Registration Form.....	47
Annex.5 Grievance/inquiry record .....	49

## ABBREVIATIONS AND ACRONYMS

ANRE	National Agency for Energy Regulation
AMAC	Moldova „Apa-Canal” Association
CSO	Civil society organization
CWSCs	Citizen Water and Sanitation Committees
ECAPDEV	Europe and Central Asia region Capacity Development Trust Fund
EIA	Environmental Impact Assessment
EPIU	Environmental Project Implementation Unit
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
FGD	Focus group discussion
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IDI	In-depth interview
LPA	Local Public Authorities
M&E	Monitoring & Evaluation
MARDE	Minister of Agriculture, Regional Development and Environment
MECR	Ministry of Education, Culture and Research
MHLSP	Ministry of Health, Labour and Social Protection
MWSSP	Moldova Water Security and Sanitation Project
NGO	Non-Governmental Organization
PAPs	Project-affected parties/ persons
PIE	Project Implementing Entity
PIP	Performance Improvement Plan
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RDAs	Regional Development Agencies
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
TA	Technical Assistance
TOR	Terms of Reference
USD	United States Dollar
WASH	Water Supply, Sanitation and Hygiene
WB	World Bank
WSS	Water Supply and Sanitation

## GLOSSARY OF KEY TERMS

*Affected Communities* - Refers to groups of people living in close proximity to a project that could potentially be impacted by a project (“Stakeholders,” in contrast, refers to the broader group of people and organizations with an interest in the project).

*Consultation* - The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

*Engagement* - A process in which a company builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader “stakeholder engagement” strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.

*Environmental and Social Impact Assessment* - An assessment comprising various social and environmental studies which aim to identify project impacts and design appropriate mitigation measures to manage negative impacts, and to enhance positive ones.

*Grievance Redress Mechanism* - a process for receiving, evaluating, and addressing project-related complaints from citizens, stakeholders and other affected communities.

*Non-governmental Organizations* - Private organizations, often not-for-profit, that facilitate community development, local capacity building, advocacy, and environmental protection.

*Partnership* - In the context of engagement, partnerships are defined as collaboration between people and organizations to achieve a common goal and often share resources and competencies, risks and benefits.

*Stakeholders* - Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively (IFC’s Handbook on Stakeholder Engagement (2007)); workers, local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g. local authorities, neighboring projects, and/or nongovernmental organizations, etc.

*Stakeholder Engagement Plan* - A plan which assists investors with effectively engaging with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.

## 1. INTRODUCTION

The purpose of this Stakeholder Engagement Plan (SEP) is to identify the key stakeholders of the Moldova Water Security and Sanitation Project (MWSSP) and propose stakeholder engagement measures. The project will have a strong communication and stakeholder engagement to ensure that all the stakeholders are being informed and consulted both prior and during project implementation and are given the opportunity to influence project activities. The SEP has been prepared according to the Environmental and Social Standards (specifically - ESS10: Stakeholder Engagement and Information Disclosure) of the World Bank Environmental & Social Framework (ESF) and will cover the whole life of the Project.

### 1.1. Project Background

Water security is central part of the Government of Moldova's Action Program. The country's National Water Supply and Sanitation Strategy 2014-2028 aligns with the universal access target under Sustainable Development Goal 6. The Project responds to the immediate needs of delivering services while also addressing institutional weakness in the sector. It aligns with the FY18-21 Country Partnership Strategy, specifically on addressing inclusive services in lagging regions, sector governance and mainstreaming of climate change impacts, both in terms of adaptation through resilient infrastructure and, where possible, mitigation (e.g. in wastewater treatment energy efficiency). The project responds to COVID-19 recovery by increasing resilience against future outbreaks through provision of essential Water Supply, Sanitation and Hygiene (WASH) services in rural schools and health centers.

*World Bank Water Security Diagnostic*<sup>1</sup> showed that water-related infrastructure, its financing, and weak institutions are critical water security challenges for Moldova's development. In response, the Water Security and Sanitation Project was co-developed with MARDE to respond to a prioritized set of interrelated challenges, such as (i) inequalities in access and inadequate quality of water supply in small towns; (ii) weak performance of service providers; (iii) poor environmental health due to a critical lack of sanitation, wastewater collection and treatment; (iv) weak institutions, fragmented financing streams and lack of programmatic delivery of water and sanitation (WSS).

The project preparation activities, environmental and social impact assessment, Environmental and Social Framework (ESF) documents for successful preparation, approval and implementation, including feasibility and design studies were financed from the ECAPDEV Trust Fund Project Preparation Grant.

The MWSSP will last for five years and MARDE will have overall responsibility for the Project as Project Implementing Entity (PIE) and the Public Institution Environmental Project Implementation Unit (EPIU), founded by the MARDE will be the Project Implementation Unit (PIU) accountable for the fiduciary, ESF, reporting and technical roles.

### 1.2. Project description

#### 1.2.1 Project Objective

The project development objective is to increase access to safely managed water supply and sanitation services in selected rural areas and small towns, and to strengthen national and local institutional capacity for water supply and sanitation delivery.

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<sup>1</sup> Executive Summary Moldova Water Security Diagnostic, The World Bank, 2020

### 1.2.2. Project Components

The **Moldova Water Security and Sanitation Project** includes four components, as described below:

#### Project Components.

**Component 1 – Access and Quality of Water Supply and Sanitation (WSS) services in Small Towns and Rural Areas.** This component will develop new and rehabilitate existing WSS infrastructure and facilities in rural areas and small towns, herewith expanding access and quality of services for households, businesses and in public social institutions. It consists of two sub-components:

- Subcomponent 1.1: Expanding access and quality of WSS services: Subcomponent 1.1 will finance investments in small towns and rural areas prioritized by the MARDE in line with the National Water Supply and Sanitation Strategy 2014-2028. This includes: i) expansion and improvement water supply services in Cahul, Vulcanesti<sup>2</sup> and Riscani district, ii) expansion and improvements of wastewater services in Soroca and Comrat municipalities, and iii) improvements in on-site sanitation services for rural villages. Activities include, but are not limited to, the (re)construction and protection measures for water intake facilities, drinking water quality treatment, transmission mains, distribution network, household connections, construction and rehabilitation of sewer networks, wastewater treatment plants including sludge treatment and disposal, sewer connections for households, and a household grant incentive scheme to improve on-site sanitation services in rural villages where sewer solutions are not financially feasible. It finances feasibility, design and preparation studies, independent technical supervision services, capacity building for citizen engagement activities in sub-project locations, and advisory support to prepare necessary tariff applications and service delegation arrangements between district and local government administrations and licensed WSS operators.
- Subcomponent 1.2: Improving WASH<sup>3</sup> facilities in public institutions: Subcomponent 1.2 will improve WASH facilities within health care centers in sub-project locations under component 1.1 and within primary and secondary schools in sub-project locations under component 1.1 and other locations based on an inventory of WASH investments needs. This includes the rehabilitation/construction of water supply connections to centralized networks or existing point sources, connection to sewer systems or construction of on-site sanitation facilities, and the rehabilitation or new construction of indoor toilet facilities with adequate handwashing and hygiene facilities. The sub-component will finance capacity development to ensure adequate O&M of the facilities, as well as education and behavior change campaigns for school staff, students and health workers on hygiene and handwashing.

**Component 2 – WSS Sector Development and Modernization.** This component will focus on medium to long-term WSS sector development and modernization by strengthening institutional capacities of national and sub-national entities for sector management, planning, regulation and reform implementation, and increasing capacities of WSS operators to improve service delivery performance. It includes two sub-components:

- Subcomponent 2.1: National WSS Institutional Capacity Development and Reform. This sub-component will finance activities to strengthen institutional capacities at national level for resilient, inclusive, sustainable and efficient sector development and modernization. The sub-component will focus on capacities for planning, financing, economic regulation, performance monitoring, professional development and the revision and development of

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<sup>2</sup> Vulcanesti district is part of the Autonomous Territorial Administration of Gagauzia. Its autonomy is ethnically motivated by the predominance of the Gagauz people. On 23 December 1994, the Parliament of the Republic of Moldova accepted the "Law on the Special Legal Status of Gagauzia".

<sup>3</sup> WASH (Water Supply, Sanitation and Hygiene) facilities will follow at least the minimum requirements for a basic service as per the Sustainable Development Goals targets for WASH facilities in schools and health care centers. See also: <https://washdata.org/monitoring/health-care-facilities> and <https://washdata.org/monitoring/schools>

new policies and normative documents. Under leadership of MARDE, and in collaboration with other entities, this sub-component will finance goods, consulting services, non-consulting services, and training for the following: i) the preparation of a National WSS Development Plan<sup>4</sup>, investment program and financing strategy and capacity development of its lead entity ii) the aggregation process of WSS operators into regional licensed service providers under this Plan, iii) the development and roll-out of a national WSS information system for performance benchmarking, iv) the preparation of revisions and/or new legislation, policies and normative documents, and new design & construction norms for sanitation, v) the capacity development of ANRE, the WSS regulator, Operators and Local Administrations to comply with tariff procedures, and vi) the implementation of a professional development program, in collaboration with AMAC<sup>5</sup> and Moldovan education institutions<sup>6</sup> to upskill existing and attract new human resources, specifically women, to the sector.

- Subcomponent 2.2: Performance Improvement Program for WSS. Sub-component 2.2. will finance investments (goods, works) and technical assistance (consulting services, training) to support a prioritized multi-annual Performance Improvement Plan (PIP) to lift the performance of five WSS operators<sup>7</sup> involved under component 1.1, specifically for related to financial sustainability, efficiency, inclusion and resilience. It will introduce annual performance assessments against agreed targets, based on an initial two-year PIP, and – depending on the achievement of targets, the financing of priority measures under a second multi-year PIP. Investments and measures include but are not limited to: increasing connection rates, improving commercial practices and accounting systems, asset management, water metering programs, non-revenue water (NRW) reduction programs, energy efficiency, improved customer orientation, water safety and resilience/continuity plans. Customer feedback and engagement will be a part of the annual performance assessments.

**Component 3 - Project Management and Coordination.** This component will finance operational costs, consulting services, non-consulting services, goods, and training to finance the overall project management cost, including the core project team for the Project Implementation Unit (PIU), implementation support needs at regional level within Regional Development Agencies (RDAs) and at central level for MARDE, as Project Implementing Entity (PIE). It will finance capacity building for project implementation, financial audits, implementation support consultants, training and workshops, cost for project communication and citizen consultations, and monitoring and evaluation of project results.

**Component 4 – Contingent Emergency Response Component (CERC).** A provisional zero-amount component is included, which will allow for rapid reallocation of credit/loan proceeds from other components during an emergency under streamlined procurement and disbursement procedures. This component allows the Government to request the Bank to re-categorize and reallocate financing from other project components to cover emergency response and recovery costs. The CERC will be established and managed in accordance with the provisions of the Bank Policy and Bank Directive on Investment Project Financing.

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<sup>4</sup> The National WSS Development Plan will form the WSS Section, of the National Territorial Development Plan, in line with Law 835/1996 and as per the guidance through Ministerial decree of MARDE, approved June 25, 2020.

<sup>5</sup> The National Associations for Water and Sanitation utilities

<sup>6</sup> Including but not limited to the Technical University of Moldova and its departments and technical colleges.

<sup>7</sup> These include Cahul Apacanal, Vulcanesti Apacanal, Riscani/Costesti Apacanal, Sorooca Apacanal, Comrat Apacanal.

### 1.3. Purpose and objectives of SEP

The purpose of the SEP is to provide a framework for appropriate stakeholder consultation and information disclosure in the context of the Moldova Water Security and Sanitation which meets both the National legislation and World Bank ESF requirements. The goal of the SEP is to facilitate project participatory decision-making by involving project-affected parties<sup>8</sup> (PAPs), citizens in the project locations, and other stakeholders in a timely manner so that these groups are provided enough opportunity to voice their opinions and concerns to shape both the design and implementation of the project to incorporate those concerns.

The overall objectives of SEP as stated in the ESS-10 are to:

- Identify the roles and responsibility of all stakeholders and ensure their participation in all stages of the project cycle;
- Establish a systematic approach to stakeholder and citizen engagements that will help to identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties;
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance;
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project cycle on issues that could potentially affect them;
- 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 taking special consideration for the disadvantaged or vulnerable groups;
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project Implementing Entity and its Project Implementation Unit to respond to and manage such grievances.

Specifically, SEP serves the following purposes:

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

This SEP will be disclosed by MARDE, the Project Implementing Entity, of the ECAPDEV Grant and of the MWSSP<sup>9</sup> on its website. In addition, downloadable links to the SEP will be available on the digital citizen engagement platform for the MWSSP ([link](#)) that will be managed by PIU. Moreover, the websites of relevant Regional Development Agencies (RDAs), under MARDE will be used to disclose the SEP with links to the MWSSP online Platform. Feedback from stakeholders will be incorporated in the final version of SEP.

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<sup>8</sup> Individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

<sup>9</sup> The Grant Objective was to support the preparation of MWSSP and to strengthen the institutional capacity for project preparation and early implementation activities.

## 1.4. Principles of Effective Stakeholder Engagement

The project's Stakeholder Engagement Plan (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on "International Best Practice" include the following:

- Commitment is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process;
- Integrity occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- Respect is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized;
- Transparency is demonstrated when community concerns are responded in a timely, open and effective manner;
- Inclusiveness is achieved when broad participation is encouraged and supported by appropriate participation opportunities;
- Trust is achieved through open and meaningful dialogue that respects and upholds community's beliefs, values and opinions.

## 2. REGULATORY CONTEXT

### 2.1. Legislation of the Republic of Moldova

The Republic of Moldova has the following legislation related to citizen/stakeholder engagement which covers both the right to access information and participation in policy development and decision-making:

- **Law No.982 / 2000 on Access to Information**, as amended in 2003-2011-2015-2018

The present law regulates:

- a) the interaction between the providers of information and individuals and/or legal entities during the exercise of their constitutional right to access information.
- b) the principles, conditions, ways and order of accessing official information held by the providers of the information
- c) the obligations of information providers to ensure access to official information;
- d) methods of safeguarding the right to information.

- **Law No.64 / 2010 on Freedom of Expression**, as amended in 2012-2013-2015

This law guarantees right to freedom of expression and regulates the balance between right to freedom of expression and defense of private and family life.

- **Law No.239 / 2008 on Transparency in Decision Making**

The law refers to the transparency of information linked with the decision-making process and to the consultation of stakeholders when drafting decisions. The consultation during the decision-making process aims at collecting, providing and exchanging information. The consultation with and involvement of citizens, civil society, and business environment in certain major issues guarantees a higher value of documents drafted and approved by the authorities and their support at the implementation stage.

According to the present law, Citizens have the right:

- a) to participate, under the conditions of the present law, to any stage of the decision-making process;
- b) to request and obtain information regarding the decision-making process, including receiving the draft decisions accompanied by the related materials, according to the Law on access to information;
- c) to propose to the public authorities, the initiation of the elaboration and the adoption of the decisions;
- d) to submit to the public authorities' recommendations regarding the draft decisions under discussion.

According to this law, for the purpose of ensuring transparency in decision-making, the public authorities must go through the following stages:

- a) informing the public that the drafting of the decision has started;
- b) providing the draft decision with accompanying materials to the stakeholders;
- c) consulting the citizens, organizations and other stakeholders;
- d) examining the recommendations of citizens, organizations created pursuant to the law, and other stakeholders when drafting decisions;
- e) informing the public regarding the decisions adopted.

- **Administrative Code of Republic of Moldova, No.116/2018**

The administrative code establishes procedure for consideration of petitions of the RM citizens addressed to the relevant authorities/bodies (further - "bodies") for the purpose of ensuring protection of petitioners' rights and legitimate interests.

In this code the petition is understood as any the statement, claim, suggestion, appeal submitted to competent authorities, including a preliminary application challenging an administrative act or a failure to consider an application within the statutory deadline.

The Petitioner/Applicant who is not satisfied with the answer received on the preliminary application or did not obtain an answer within the statutory deadline has the right to appeal to the competent administrative court.

The Petition is addressed in written or electronic form in the state or other language according to the Law on functioning of languages on the territory of the Republic of Moldova.

The Petition must include: the name and surname of the petitioner; the petitioner's address and the e-mail; the name of the public authority; the subject of the petition and its motivation; the signature of the petitioner or his legal or authorized representative, and in the case of the petition transmitted in electronic form - the electronic signature. The anonymous or submitted petitions without indicating the petitioner's postal or e-mail address are not examined.

- **Law No.86 / 2014 on Environmental Impact Assessment, as amended in 2017**

This Law sets the basis for the functioning of the mechanism of environmental impact assessment of some public and private projects or some projected economic activities with a view of prevention or reduction the negative environmental impact and protection of public health at the initial stages of project performance. EIA shall be performed in accordance with the following principles: (a) preventive actions; (b) reliability and completeness of information c) principle of transparency and accessibility; d) participatory principle; e)

precautionary principle; f) polluter - pays principle. Public consultations for the projects which require a full EIA are compulsory at the initial stage of the project before preparing the EIA (at the scoping stage) and at a later stage, when the Statement on EIA is disclosed to the public prior to reviewing the final (updated) documentation by the state environmental authority.

- **Law of the Republic of Moldova no. 134 of 14.06.2007 on mediation**

The mediation will be used to resolve disputes as an option where users are not satisfied with the proposed resolution. Law of the Republic of Moldova no. 134 of 14.06.2007 on mediation (hereinafter - the Law on Mediation) is implemented from July 1, 2008. The purpose of the legislation is to regulate mediation as an alternative dispute resolution amicably mediator and mediation process status. Law on Mediation was included as an alternative method for resolving conflicts, a concept that is internationally recognized and promoted in all national legal systems.

## **2.2. World Bank Requirements**

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10 "Stakeholder Engagement and Information Disclosure", recognizes 'the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice'. Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. Borrowers will engage in meaningful consultations with all stakeholders.
- Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not.
- A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It must be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower must disclose the updated SEP. According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

## 2.3 Gap Analysis between National Legislation and World Bank

The table below provides a brief analysis of the gaps and differences between the national legislation and World Bank requirements and details how these gaps will be addressed under the Project.

**Table 1. Gap Analysis between the National Legislation and World Bank**

National legislation	World Bank	Project
The national legislation has no provision for the development of a specific stakeholder engagement plan for public consultations.	Consultations with stakeholders and public involvement are the integral parts in the development and implementation of the SEP.	Moldova currently does not have clear national legislative provisions on the citizen and stakeholder engagement for specific investment programs and projects. In those cases, it relies on the relevant provisions of the WB requirements. The project will carry out a comprehensive consultative process with project - affected persons, local and state authorities, other stakeholders as being required through public disclosure meetings, individual consultations and public consultations
The national legislation has provisions that allow citizens to make complaints and grievances, but these provisions do not allow anonymity. The anonymous or submitted petitions without indicating the petitioner's postal or e-mail address are not examined.	The World Bank ESS10 allows the option of anonymous provision of grievances.	The project will apply the WB standard and allow anonymous submission of grievances and complaints.
The national legislation does not have special provisions to address the concerns of the vulnerable groups during the consultation process.	The ESS10 specifically provides for the identification and engagement with the vulnerable groups that might be affected by the project to ensure that these groups also benefit from the project activities.	The SEP will identify affected vulnerable persons and engagement mechanisms to ensure that their voice is heard, and the concerns are addressed to the extent possible by the project.
The national legislation does not have provisions to establish a Project specific GRM.	According to the ESS 10 and ESS 2 the Project specific GRM should be established and be easily acceptable for all	The Project specific GRM will be established for all stakeholders at each stage of the Project, including

	stakeholders at each stage of Project, including specific GRM for project workers	GRM for all project workers <sup>10</sup> .
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### 3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The initial concept for the proposed Project was presented during several multi-stakeholder meetings, including the National Coordination Meeting for Regional Development (February 2019), as well as the External Assistance Coordination Working Group for the Integrated Water Resources Management Sector (June 2019). Further consultation meetings were conducted as part of project scoping (Oct 2019) and subsequent identification (Mar 2020) and preparation (Sept 2020) including separate meetings with Regional Development Agencies and local public administrations, as well as other government stakeholders and development partners. This was an important stage to allow stakeholders to understand better the scope, impact and risks of the Project, and potential opportunities; to make available Project-related information as early as possible and to facilitate further activities of MWSSP (Table 2).

The objectives of the preparation mission were to conduct a series of discussions with sector authorities and other key stakeholders, including respective implementation units, local governments and utilities to: (i) determine key elements of the project design, including costing of activities for all components; (ii) develop an initial results framework; (iii) assess safeguards and fiduciary capacity of the assigned implementation unit; (iv) discuss project readiness requirements related to Environmental and Social Standards; (v) initiate assessments on utility performance, gender and citizen engagement, climate change and international water ways; and (vi) discuss advance procurement under the Europe and Central Asia Region Capacity Development Trust Fund (ECAPDEV) Grant and review progress in approval and ratification.

A positive feedback was received from all stakeholders during the meetings. The responsibilities of each stakeholder in the project preparation stage and further involvement were discussed and agreed.

**Table 2. Stakeholder Engagement Activities during Project scoping and early preparation**

Stakeholder	Main topics discussed
Minister of Agriculture, Regional Development and Environment Regional Development Authorities	<ul style="list-style-type: none"> <li>• Tentative design of the project components to meet the expectations;</li> <li>• Arrangement for the project preparation;</li> <li>• Discussions about the localities/sites included in the project;</li> <li>• Alignment of the project with national strategy;</li> <li>• Investment viability of the project;</li> <li>• Contribution of the project to the country's economic development, poverty reduction and shared prosperity.</li> <li>• Project preparation timeline and the documentation required, such as the Environmental and Social Impact Assessment (ESIA) &amp; Environmental and Social Management Framework (ESMF), the Stakeholder Engagement Plan (SEP) and the compliance with gender requirements of the World Bank.</li> </ul>
Ministry of Education, Culture and Research	<ul style="list-style-type: none"> <li>• Technical meeting to discuss objectives and approach for WASH interventions in the areas of health and education;</li> <li>• Design of components and methodology for selection of sub-</li> </ul>

<sup>10</sup> Directly engaged people (PIU staff and consultants) and contracted workers (people employed or engaged through contractors/ subcontractors that will perform work for specific project activities).

Stakeholder	Main topics discussed
Ministry of Health, Labor and Social Protection	projects.
Meeting with local stakeholders: Water and Sanitation Utility Providers & LPA	<ul style="list-style-type: none"> <li>• Meeting to present overall Project objectives and activities and implementing arrangements and MWSSP requirements;</li> <li>• Discuss Utility and gender assessments;</li> <li>• Identification of local focal points for MWSSP activities.</li> </ul>

During October – November the *Gender Gap and Citizen Engagement Analysis* as part of the stakeholder engagement activities was conducted in the localities included in the project (Cahul, Costesti (Rascani), Comrat, Sorooca). The study analyzed (i) the existing practices related to citizens & customer engagement, (ii) the main challenges they have related to water and sanitation services and models for population engagement, including vulnerable categories and (iii) prospective effective ways and entry points for strengthening citizen engagement and customer orientation. The analysis was developed around the spectrum of citizen engagement stages, which include consultation; collaboration and participation; and empowerment.

The research was based on individual interviews (26 IDI) and focus-group (8 FGD) discussions with various stakeholders and had a two-dimensional focus: internal, covering employees, Human Resources and the management of utilities and external, covering customers, Civil Society Organizations (CSOs), professional associations, academia, social institutions and donors working in the sector (Annex 2). The total number of 77 respondents were interviewed, inclusive 38 women and 39 men, in terms of representation of ethnic groups, the participants were customers and employees, of various ethnicities, including Roma (Sorooca), Gagauz (Comrat), however other ethnicities participated in the FGD and interviews. The analysis included interview with Roma Baron and FGDs with customers of various ethnicities. The interviews and focus groups were conducted in the Romanian and Russian languages.

According to feedback from interviews and focus groups, in all the surveyed communities, citizens are provided with information about the WSS utility and its services, including tariffs, projects, planned operations, etc. Customers mentioned that their Utilities have different mechanisms for providing information to customers: social networks, information boards in front of the utility, information boards placed in front of the block of flats, information boards placed at Municipality office the local radio&TV. Water bills printed on hard copies are also a tool used by the surveyed Utilities to communicate contacts or other brief information.

The main concern of customers about information was that they do not receive timely information from Utilities about disruption in service and often are left without water for hours. Further discussion with utility representatives identified that this fact is linked with breakages on the line.

Consumers, usually, can ask questions and submit their grievances by phone, directly to the office of the utility and through field water-meter field operators.

Feedback from the focus groups identified that despite the fact that there are no perfect platforms or tools at present, which would empower citizens to actively engage in the management of water supply and sewage operation, customers are interested in having a voice and a constant involvement in the future WB project. There is openness and interest from consumers in actions that can improve water and sanitation services.

Participants mentioned that the future WB project should create space, which would allow citizens, local public authorities, utilities and construction contractors to use a two-way feedback on project

implementation, including project-specific investments in the subprojects, proposed service delivery arrangements and transparent contracts, local representation in the governance boards of WSS operators, tariffs and connection fees and metering arrangements. The channels should include community consultation meetings, digital and other media information and communication campaigns, and beneficiary satisfaction surveys at regular intervals to course correct. The capacity development and activities conducted during the project should be designed to empower citizens and communities to stay engaged inclusively after completion of the project in monitoring the service delivery, procurements, contract awards, and any other practices, which contribute to increased transparency, improved efficiency of service delivery and reduce opportunities for corruption in the sector. The qualitative research found that the citizens' expectations are related to expected improvements and changes created through their engagement. Consumers' feedback aimed at improvement of water supply and wastewater services.

Further consultations were held during project preparation, in November, 2020, led by MARDE and PIU, in line with *the SEP prepared for the ECAPDEV Project Preparation Grant*. Due to ongoing COVID-19 safety concerns, consultation modalities were adapted as noted below. Two notes/leaflets (one general and another specific to the WASH component) were elaborated to inform the stakeholders and PAPs on the objectives of the project. Information Notes were sent electronically to relevant stakeholders (MHLSP, MECR, AMAC, CALM) in order to inform them about the Project and announce the schedule for the on-line Public Consultations. They were asked to share the information with all possible interested parties in Project activities. The Informational Note included the phone number and email for supplementary information requests.

The Information Note about the Project components and WASH sub-component was disseminated to all education and health departments at the rayon level and then it was distributed to all educational and health institutions.

The Moldova „Apa-Canal” Association (AMAC) sent by email the Information Note and invitation to Public Consultations to all their members<sup>11</sup>.

The information about Public Consultations and MWSSP components was disseminated via LPAs, websites<sup>12</sup>, Facebook (LPAs, local CSOs), viber groups, regional TV. To ensure participation of local CSOs follow-up calls were made after the electronic invitation to confirm their participation. The Information Note and the presentation of the project components were prepared and disclosed in Romanian, but The Regional Development Agency Gagauzia provided the information note in Russian on their website for Russian speakers. An email address and phone number for questions, comments and suggestions was also provided. About 15 calls were received and addressed by the PIU from Schools managers and LPAs in order to learn more details about the criteria for selecting social institutions for WASH improvements and the location of the WSS infrastructure sub-projects.

A total of three on-line consultations were conducted. An overview of consultations/meetings is presented in (Annex 2). Participants mentioned that the proposed project and interventions to improve services related to water and sanitation are a necessary intervention and expressed overall support for the proposed project. The main findings of public consultations revealed that: i) It is necessary to provide more detailed information about the tentatively identified sub-projects; ii) the population should be informed about the stages of the project, given the fact that citizens are

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<sup>11</sup> <http://amac.md/pageview.php?l=ro&idc=56&t=/DESPRE-AMAC/Membrii-AMAC>

<sup>12</sup> <http://www.amac.md/doc.php?l=ro&idc=15&id=562&t=/PRESA/Noutati/Consultarile-publice-initiale-cu-privire-la->

[https://www.primsoroca.md/ro/comunicat-soroca-ar-putea-beneficia-de-proiectul-securitatea-aprovizionarii-cu-apa-si-](https://www.primsoroca.md/ro/comunicat-soroca-ar-putea-beneficia-de-proiectul-securitatea-aprovizionarii-cu-apa-si-sanitatie-in-moldova)

[sanitatie-in-moldova](https://www.primsoroca.md/ro/comunicat-soroca-ar-putea-beneficia-de-proiectul-securitatea-aprovizionarii-cu-apa-si-sanitatie-in-moldova)

<http://adrgagauzia.md/libview.php?l=ru&idc=340&id=4082&t=/precca/novocti/obcujdenie-voprocv-ocictnih-coorujenii-v-mun-komrat>

expecting immediate field action/ infrastructure construction; iii)The RDA's representatives insisted on the necessity for clarity regarding their level of involvement, the responsibility of the regional agencies, so that they can estimate the resources, including the human resources, that will need to be involved in this process; iv) The participants of the meetings from Comrat and Soroca mentioned that this is an expected project by their citizens, given the fact that there are problems with sewage treatment plants and/or the outdated water and sewerage system, which requires permanent repairs, and these problems are almost daily bases on the LPA agenda.

Under component 1.2. WASH in Social Institutions, it was mentioned that: i)The situation regarding the water and sewerage infrastructure in the medical centers is more deplorable given the fact that there were fewer opportunities to finance them; ii) According to specialists, the most disadvantaged region were the education and health institutions have poor access to water and sanitation facilities , is the Northern Region of the country, including Riscani and Soroca District; iii) At the moment around 361 educational institutions (mostly from rural areas), about 30% of the total, have outside toilets. Solutions are constantly being sought to provide water and sanitation facilities inside buildings; iv) The representative of the Ministry of Education, Culture and Research mentioned that there are educational institutions that are disqualified from projects of water improvement and sewerage infrastructure (a recent example being the projects funded by FISM<sup>13</sup>), access to sanitation due to lack of wastewater treatment plants in given localities. According to him, the WWS infrastructure of these buildings are in the most precarious situation and solutions must be identified for these institutions as well.

Regarding the stakeholders' engagement methods and strategies, some participants mentioned that for the consultations during the Covid-19 pandemic, different online tools and platforms that are more familiar to stakeholders should be used , , . The methods of communication with the population should be adjusted based on locations:such as reaching out door-to-door for the population in rural areas and online for urban areas. According to some LPA representatives, it would be more useful to have leaflets so they can be distributed to the population and project could be discussed in the community between relatives and neighbors. In this case residents would have a clearer opinion about the project's components, the responsible institutions and the financial resources allocated for this purpose. It was mentioned that the existence of implementation units at a local level will facilitate informing of the population and its involvement in the project activities. Awareness campaigns are needed, and in this regard the work of local committees seems to be a good method for effective involvement and monitoring by the community. There were exemplified projects with EU funding sources implemented through the GIZ that RDA North manages. These committees include: implementers, LPA representatives, CSOs, local activists, etc. These committees meet to get information about the project activities, get involved in decision-making activities and then engage community members if it is necessary. Another suggestion referred to the contracting of information and consultancy services from NGOs working with the population in this field. Another suggested mechanism is the Regional Council for Northern Development, 4 people from each district are involved in this council, usually the President of the District, a delegate by CALM, a representative of the CSO and a representative of the business environment.

The summary of discussion, comments and suggestions received during Public Consultations are available in Annex 3.

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<sup>13</sup> Moldova Social Investments Fund

## 4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

### 4.1. Identification of Stakeholders

Project stakeholders are defined as individuals, formal or informal groups and organizations, and/or governmental entities whose interests or rights will be affected, directly or indirectly by Project, both positively and negatively, who may have an interest, and who have the potential to influence to the Project outcomes in any way.

In accordance with the ESS10, this SEP categorizes the stakeholders into three groups in order to ensure a more efficient and effective stakeholder engagement:

- **affected parties** - stakeholders that are affected or may be affected by the project;
- **other interested parties** - other parties who may have an interest in the project.
- **vulnerable/ disadvantaged groups** - individuals or groups who may require special engagement efforts due to their vulnerable status.

1) The MWSS Project has multiple stakeholders from government, private sector, academic sector, civil society and the general public. For the purposes of the SEP document, stakeholders who are likely to be directly affected, and involved in the implementation of the policy, are classified as **Affected Parties**, among them are:

**a) Ministries and government agencies**

- Minister of Agriculture, Regional Development and Environment
- Regional Development Agencies:
  - Regional Development Agency North
  - Regional Development Agency South
  - Regional Development Agency Gagauzia

**b) Local Public Administrations (LPAs)**

- Cahul
- Comrat
- Vulcănești
- Costești (Riscani)
- Soroca
- Other villages that will benefit from Project investment (**South region:** Pelinei, Gaavanoasa, Burlaceni, Iujnoe, Ioan Cuza, Etulia, Chismichioi Pelinei, Satuc, Gavanoasa, Vladimirovca, Nicolaevca, Burlaceni, Greceni, Iujnoe, Satuc; **Riscani rayon** : Pascauti, Damascani, Zaicani, Pirjota, Hiliuti, Horodiste, Varatic, Dumei, Duruitoarea Veche, Proscureni.)<sup>14</sup>

**c) Water and sanitation service providers**

- Apa-Canal Cahul
- Apa-Canal Costești
- Apa-Canal Soroca
- SU-Canal Comrat Municipal Enterprise
- Other Water and sanitation service providers (selected for **Component 2:** Strengthening of capacities for Water Sector Modernization), such as Apa Canal Vulcanesti, Apa Canal Riscani, and potential other Apacanals that may be supported in the consolidation process.

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<sup>14</sup> The list of localities that will benefit from investment is still updated

- d) The selected Health centers and education entities (kindergarten, schools) and their LPAs**
- e) Water and sanitation service consumers (general population, farmers, businesses)**
- f) Citizen Water and Sanitation Committees (CWSCs) that will be created for the sub-projects under component 1.1 of the project**

**2) Other Interested Parties** include individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and/or who could affect the project and the process of its implementation in some way. Other interested parties include, among others, government institutions that may be involved in various ways in the project, as well as academia, civil society, international organizations, the media etc.

**a) Ministries and government agencies**

- Ministry of Education, Culture and Research
- Ministry of Health, Labor and Social Protection
- Ministry of Finance
- Ministry of Internal Affairs
- The State Ecological Inspectorate
- ANRE – National Energy Regulator<sup>15</sup>
- “Apele Moldovei” Agency
- “Moldsilva” Agency etc.

**b) CSOs**

- **National level CSOs**
  - Congress of Local Authorities from Moldova<sup>16</sup> (CALM)
  - Moldova „Apă-Canal” Association<sup>17</sup> (AMAC)

• **Local civil society and media**

<b>Cahul</b>	NGO: Ecological Consulting Center, Cahul Regional Center for Consumer Assistance South, Regional Center for Assistance and Information of the NGO CONTACT- Cahul (CRAION CONTACT- Cahul) NGO "Perspectiva" "Cahul Expres" – newspaper
<b>Comrat</b>	NGO: Institute for Democracy, or. Comrat, UTA Găgăuzia Association of mothers with many children NGO „Vesta”, or. Comrat, UTA Găgăuzia Legal Clinic, Comrat <i>TV, radio</i> Gagauziya Radio Televizionu kulesi, GRT <i>News portals:</i> gagauz.md gagauzinfo.md gagauzyeri.md nokta.md

<sup>15</sup> Also mandated for regulation of water and sanitation services

<sup>16</sup> [www.calm.md](http://www.calm.md)

<sup>17</sup> [www.amac.md](http://www.amac.md)

<b>Costesti (Rascani)</b>	"Eveniment Actual" – newspaper
<b>Soroca</b>	Local Coalition of CSOs from Soroca municipality Youth Resource Center „Dacia”, Soroca – NGO Roma community leaders Sor-TV - news.sortv.md – Local TV channel Observatorul de Nord – newspaper

**c) Academic institutions**

- The Technical University of Moldova/ Continuous Training Center<sup>18</sup>
- The technical colleges.

**d) International Financing Institutions and donors**

The World Bank (ongoing projects), European Bank for Reconstruction and Development (EBRD), UNDP/MIDL, European Union, GIZ, KfW, Swiss Development Cooperation, Austrian Development Agency, JICA.

**3) Disadvantaged and vulnerable groups** are persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their representation in the consultation and decision-making process associated with the Project. The Project Team will take an effort to ensure that the vulnerable and disadvantaged groups are aware about the proposed project activities and has a possibility to submit their propositions/suggestions.

Disadvantaged/vulnerable individuals and groups are also those who may do not have a voice to express their concerns or understand the impacts of the Project, are sometimes excluded from SEP. It is expected that the vulnerable households will benefit from the proposed project intervention by improving access to water and sanitation services and increasing their quality of life. These groups will have priority to access to water supply services. The MARDE/ PIU will closely monitor the consultation process to ensure access and awareness of the project benefits to the following vulnerable categories:

- Low in-come households who are recipients of social assistance (Ajutor Social<sup>19</sup>) or cold-season benefit<sup>20</sup>
- Elderly people
- Households with people with disabilities
- Families with 3 or more children
- Single-parent families
- Ethnic minorities:
  - Roma people (Soroca)
  - The Gagauzes (Comrat, Vulcanesti)

The list of others vulnerable categories will be specified at the next stages of Project. The Project will introduce specific measures to support the most vulnerable households to connect to the centralized water supply and wastewater systems. Eligible households will be identified through the existing social assistance system (social assistance - *Ajutor Social* and/or cold-season benefit), the data will be provided by MHLSP. Other categories of disadvantaged/vulnerable households will be considered in collaboration with LPAs. The vulnerable and disadvantaged groups will be engaged in the all stages of project preparation activities and future interventions under Water Security and

<sup>18</sup> <https://utm.md/>

<sup>19</sup> Calculated with subsistence minimum per adult equivalent as a poverty line

<sup>20</sup> Program builds on the Ajutor Social, but uses a higher income threshold for eligibility

Sanitation Project. The Project recognizes that vulnerable people require special consideration, as they might be unable to participate, to the full extent, in the consultation activities, and may also be disproportionately affected by some impacts. The MARDE/PIU will closely monitor the consultation process to ensure access and awareness of the equal access to the consultation process and to guarantee that their voice is taken into account in order to find and implement solutions to some specific situations or issues. PIU, with support of RDAs, LPA and CSOs<sup>21</sup> will ensure the involvement of the vulnerable groups in decision-making process.

## 4.2. Stakeholder Interest and Influence

Stakeholders were analyzed in terms of their interest and project impact in order to better understand and manage them. Individual consultations and discussions will take place with those, who have high levels of interest and project impact; any changes occurring during the project implementation will be communicated to them individually. Individual consultations will also take place with the group with a medium project impact and a high interest in the project. The group with a low project impact and a high project interest will be involved in public discussions, focus groups and other forms of empowerment to increase their voice in the project design and implementation.

The table below summarizes the potential roles, interests and influence for each of the above-mentioned stakeholder groups.

**Table 3. Analysis and Prioritization of Stakeholder Groups Based on Level of Interest in and Influence over the Project**

Categories of Stakeholders	Role	Level of Analysis (H=High, M=Medium, L=Low)	
		Interest	Influence
<b>Affected parties</b>			
MARDE PIU Regional Development Agencies	Lead in implementation	H	H
The residents of communities/ water and sanitations consumers	Information Beneficiaries of investments	H	M
Health centers and schools	Information Beneficiaries of investments	H	M
Local Public Administration (LPA)	Engagement/ Distribution of information related to the Project. Representing interests of locals.	H	H
Water and sanitation operators	Engagement/ Distribution of information related to the Project implementation	H	H
Businesses located in the project area	Information Beneficiaries of investments	H	M
<b>Interested parties</b>			
Ministry of Internal Affairs (for component 4 CERC) <sup>22</sup>	Coordination and implementation of the emergency activities	H	H
ANRE and other National Authorities	Regulation, approvals, implementation	H	H
AMAC	WSS Plan development	H	M

<sup>21</sup> Local NGOs which have as beneficiaries the vulnerable people, but also and CSO, which will continuously build the capacity of the CWSCs and support the PIU, RDAs and LPAs in facilitation of diverse citizen engagement activities, particularly related to construction work and connections at the local level with CWSCs;

<sup>22</sup> if CERC is triggered

LPA	Engagement/ Distribution of information related to the Project. Representing interests of locals.	H	H
Mass media and CSOs	Communication/public information	M	M
Financial institution/donors	Funding, technical assistance	H	M
Consultants and Contractors	Collaboration, implementation	H	M
Academic institutions	Collaboration	H	H
<b>Vulnerable groups</b>			
Households with low-income	Beneficiaries of investments	H	L
Elderly people	Beneficiaries of investments	H	L
Households with people with disabilities	Beneficiaries of investments	H	L
Families with 3 or more children	Beneficiaries of investments	H	M
Single-parent families	Beneficiaries of investments	H	M
Roma people	Beneficiaries of investments	H	M
Gagauz people	Beneficiaries of investments	H	M

## 5. STAKEHOLDER ENGAGEMENT PROGRAM

The Stakeholder Engagement Program is an important component of the document expected to help engage all the stakeholders to the project and, by doing so, help the project become sustainable and inclusive. The SEP will also support the engagement of vulnerable population groups that are facing hurdles to take part in the engagement directly for social, economic, or political reasons. It is important to keep in mind that the SEP implementation is a dynamic process and some stakeholders and their interests might change over time, and hence the SEP will be updated accordingly.

### 5.1 Engagement Methods to be Used

The suggested methods would be used to communicate and consult with the stakeholders:

- Online Platform.** A dedicated webpage/Platform will be created for the project to enable users to find all the information about the project. The goal of the platform is to provide core information about the project and to ensure accessible online feedback from water and sanitation customers and to support several citizen engagement activities. The platform will also be used to publish the all ESF documents, including site specific ESIA and ESMP, RAP documents for specific sub-projects, and other relevant information related to project implementation. The platform will be used to support face-to-face consultations through digital feedback surveys at regular intervals, and will provide a dedicated portal for the identified sub-projects to inform the population and engage them in providing feedback and support monitoring through the implementation cycle. All public consultations events will be advertised through this platform. The platform's outreach will be guaranteed by ensuring that links with various websites of relevant entities (MARDE, RDAs, LPA, utilities) are developed and outreach will be done through social media to make sure citizens can easily find and access the platform.
- Public Consultations / virtual consultations.** Consultations have been and will continue to be organized during the project design stage and the project implementation. Public consultations will be organized for ESF framework documents, as well as site specific ESIA and other ESF documents. Moreover, public consultations will be held on an ongoing basis as part of the citizen engagement process during the project cycle.

- **Workshops.** The workshops with experts will be held to consult on the revision and development of new policies and normative documents. Also several workshops with citizen/ stakeholders will be carried out. The main topics of these workshops will be: i raising stakeholder awareness on project benefits, establishing project implementation procedure, timing for project implementation, and GRM. Other topics relevant for these workshops will be identified during project implementation.
- **Beneficiary Surveys, sanitation beneficiary survey complemented by local snapshots and Focus Groups.** The surveys will be advertised and conducted every six months through the online platform. The local snapshots will accompany the survey, aim to reach those who are not able to provide online feedback and consist of phone conversations, focus groups and door-to-door visits conducted by the CSOs. Therefore the Beneficiary surveys can be conducted via online Platform and computer-assisted telephone interviewing (CATI)<sup>23</sup> and focus groups discussions via online communication platforms like ZOOM.
- **In-depth interviews with relevant experts.** Expert’s views and recommendations on various project issues and challenges are valuable and have been conducted as part of the gender assessment. They will continue to be used as part of specific project activities (e.g. for component 2.1. on policy and normative/legislative documents).
- **Leaflets/ informative notes.** Leaflets with information that might present more interest for affected parties, such as the benefits of proposed investments, will be developed and distributed in the meetings/ public consultations/ public institutions (LPA, schools, health centers etc.).
- **Information boards.** Establish Information Boards in each sub-Project area, in the communities that will benefit by investments and also in localities with investments for WASH facilities (for schools and health care facilities). On these information boards will be placed the information related to the Project, relevant for every phase of Project implementation.
- **Letters.** The letters will be an instrument used in order to facilitate the Project implementation process through good collaboration between the implementing entities and other stakeholders.
- **Reports.** The reports will be used to monitor the Project implementation and to keep informed the main stakeholders of the Project.
- **E-mails.** To facilitate communication between implementing entities.
- **GRM.** GRM will be established in line with the World Bank’s ESS-10 requirements. A dedicated grievance mechanism will be set up for the Project. The stakeholders will be able to raise grievances anonymously by phone or online or using the project digital platform.
- **Grievance Log** - where grievances, including those delivered through the online platform, are registered (including grievance delivered by letter mail or in writing) and maintained, followed up and resolved through a database.

## 5.2 Stakeholder Engagement Plan

Stakeholder engagement is an inclusive process that must be conducted throughout the project cycle. The table below presents key stakeholders engagement activities to take place during the project preparation stage through to implementation and closure. Additional activities can be

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<sup>23</sup> telephone interviews should be considered for elderly people, and other vulnerable groups without access to internet connection. Due to COVID-19 transmission risk, face to face surveys are not recommended.

included following consultations with project beneficiaries, stakeholders and contractors if these are deemed useful and necessary.

In case of stakeholder consultation “events” (whether virtual and in face-to-face meetings), the MARDE and PIU will strive to provide relevant information to stakeholders with enough advance notice (10-15 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback. The PIU will gather (written and oral comments), review them and report back to stakeholders on how those comments were incorporated, and if not, provide the rationale for reasons for why there were not reported within 10-15 working days from the stakeholder consultation event. All consultation events will be widened in terms of outreach through the opportunity to use on-line feedback through the platform.

**Table 4. Stakeholder Engagement Plan**

<b>Project component</b>	<b>Topic of Consultation</b>	<b>Target Stakeholders</b>	<b>Issues Raised /Expected Decisions</b>	<b>Methods Used</b>	<b>Time-table/location/dates</b>
<b>Preparation Phase</b>					
All	Proposed project components	All	Issues with current status; proposed project improvements accessibility and mobility in the project area	Focus groups/interviews/workshops; public hearings; placement on the online Platform and MARDE/RDAs website	Prior to project appraisal
All	Stakeholder consultation on all draft documents:  ESMF  LMP  RPF  SEP  GRM	All	Disclosure of the documents  Enabling key stakeholders to provide their opinion, feedback, suggestions on the technical, environmental and social assessments.  Integrate and address raised suggestions, opinions and considerations in the assessments.	Emails, letters to stakeholders with appropriate background information and SEP, posting on the Platform/ MARDE website for feedback, focus groups	As soon as each individual deliverable is completed/ the documents are elaborated  The documents will be available to the public for a period of 10 days to provide comments and suggestions
<b>Implementation Phase</b>					

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
<b>Component 1: Access and quality of WSS services in small towns and rural areas</b>  1.1 Expanding access and quality of WSS services	Public outreach and communications consultancy;  Beneficiary feedback survey	MARDE and others relevant National Authorities (MECR, MHLSP);  RDAs;  LPA (I) and LPA (II) NGOs;  Mass-media general public from localities involved in the project	Seek common understanding/agreement on the component deliverables by critical clients/stakeholders  Understand and comments on environmental and social impacts  Land acquisition process (land registration; compensation rates and methodology; livelihood restoration)  Health & Safety issues. Employment opportunities; Gender Based Violence (GBV) awareness-raising; Project status. GRM mechanism.	Emails, letters for background information; meetings; deliverable presentations/workshops; presentation on the dedicated project website/Facebook page  Online Platform	As soon as each individual deliverable is complete  As needed
	ESIA (Environmental & social impacts) and ESMP  SEP, GRM  RPF and RAP  LMP	the residents of the project area  the vulnerable groups and representatives of the vulnerable groups	Citizen Water Committees roles;  Design social mobilization and communication campaign with CSOs & CWCs	Training/workshops for capacity building	As soon as possible, on the beginning of the project
	Citizen satisfaction with the level of engagement	LPA, /residents of the project area/ business owners/ /NGOs representing the	Seek feedback on the satisfaction with the project and level of engagement/consultations during implementation	Online survey (via Platform) In-depth interviews/ focus groups Beneficiary feedback survey	Annually

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
		vulnerable groups and representatives of the vulnerable groups			
	Pilot for improving on-site sanitation in rural villages	Households/ the residents of the project area	Provide cost-effective alternative to centralized solutions	Meetings Online Platform	As soon as the beneficiaries are known
1.2 Improving WASH facilities in public institutions	Discuss about the expectations and challenges of the project	Ministry of Education, Culture and Research; Ministry of Health, Labor and Social Protection;	Clear criteria for selecting the beneficiary's institutions	Emails, letters for background information; meetings; Online Platform	As soon as each individual deliverable is complete
	Inform that these investments are provided to the selected institutions based on an inventory of WASH investments needs	Schools representatives and parents; Health centers;	Seek feedback on proposed intervention on rehabilitation or new construction of indoor toilet facilities with adequate handwashing and hygiene facilities  Health & Safety issues Awareness on hygiene and handwashing importance  GRM	Workshops Focus groups; Public information boards, leaflets	As soon as the beneficiaries institutions are known

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
<b>Component 2: WSS Sector Development and Modernization.</b> 2.1: National WSS Institutional Capacity Development and Reform	Develop monitoring and benchmarking, set-up technical assistance mechanisms to large and small operators, and lead a performance improvement program to support modernization of WSS services.	MARDE, ANRE and others relevant National Authorities, Service providers Moldova „Apa-Canal” Association and others relevant NGOs, academic experts, general public	Seek feedback/agreement/buy-in on the components and proposed models	Emails, letters used to provide background information; Online Platform; Workshops.	
	Development of tariff policy and costs for WSS services;	MARDE, ANRE and others relevant National Authorities, Service providers relevant NGOs, academic experts, general public	Seek feedback/agreement/buy-in on the components and proposed models	Emails, letters used to provide background information; Workshops; Public meetings; Online Platform.	TBD
	Cooperation with ANRE and proposing alternative mechanisms to guide tariff setting and introduce incentives to aggregate with rayon operators.	MARDE, ANRE and others relevant National Authorities, LPA Service providers relevant NGOs, academic experts, general public	Seek feedback/agreement/buy-in on the components and proposed models	Emails, letters used to provide background information; Workshops; Public meetings; Online Platform.	Upon completion of deliverable
2.2: Performance Improvement Program for WSS	Capacity building activities for selected operators	selected operators in the area of project investments	Seek feedback on proposed activities	Emails, letters used to provide background information; Workshops; Public meetings;	TBD

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
				Trainings	
	Master Planning concept and methodology	MARDE, ANRE and others relevant National Authorities, LPA Service providers relevant NGOs, academic experts, general public	Seek feedback/agreement/buy-in on the components and proposed models	Emails, letters used to provide background information; Workshops; Public meetings;	TBD
	Annual performance assessments against agreed targets	Service providers Customer/ general public	Present and discuss the multi-annual Performance Improvement Plan (PIP) and the indicators of PIP	Online platform; Workshops for Service providers; Reports; Customer satisfaction feedback (surveys, FGD).	Annually
<b>Component 3 - Project Management and Coordination</b>	Overall project implementation	All	Present project implementation report; report on ESF documentation and grievances	Reports Public hearings/ Press releases; project website/ Platform	Annually
<b>Post-construction and operation Phase</b>					

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
<p><b>Component 1: Access and quality of WSS services in small towns and rural areas</b></p> <p>1.1 Expanding access and quality of WSS services</p>	<p>Citizen satisfaction with the level of engagement and GRM</p> <p>Community health and safety measures during operation phase;</p> <p>Accessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any)</p>	<p>General public from localities involved in the project;</p> <p>Vulnerable people;</p> <p>People residing in project area;</p>	<p>The level of citizen satisfaction with their engagement and GRM/ challenges and lessons learned</p>	<p>Online platform;</p> <p>Public hearings/ Press releases;</p> <p>Information boards with brochures/posters/leaflet;</p> <p>Public meetings.</p>	<p>After construction/ rehabilitation</p>
<p>1.2 Improving WASH facilities in public institutions</p>	<p>Satisfaction with the level of engagement and GRM</p> <p>Community health and safety measures during operation phase;</p>	<p>Schools representatives and parents;</p> <p>Health centers representatives and their beneficiaries;</p>	<p>The level of beneficiaries' satisfaction with their engagement and GRM/ challenges and lessons learned</p>	<p>Online platform;</p> <p>Public hearings/ Press releases;</p> <p>Information boards with brochures/posters/leaflets;</p> <p>Public meetings;</p>	<p>After construction/ rehabilitation</p>
<p><b>Component 2: WSS Sector Development and Modernization.</b></p>	<p>Discussion and appreciation of strengthen institutional capacity at national and local levels for improved WSS service delivery</p>	<p>MARDE, ANRE and others relevant National Authorities, Service providers Moldova „Apa-Canal” Association and others relevant NGOs, academic experts, general public</p>	<p>Suggestions and recommendations for the next steps and activities</p>	<p>Online platform;</p> <p>Round Table/ conferences.</p>	<p>After the implementation of the Component 2 activities</p>

### 5.3 Proposed Information Disclosure Approach

The table below provides a preliminary summary of the suggested information to be disclosed based on the project design and topics that might be of interest to stakeholders. The table, like the entire document, is an evolving tool and can be updated at any point during project preparation and implementation. Some of the proposed documentation in the current draft may not be subject to disclosure and can be removed by the MARDE / PIU from the table along with this reference.

In the line with WB ESS10, the information will be disclosed in relevant local languages (Romanian or Russian) 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.

In the context of COVID-19 pandemics face-to-face meetings will be replaced with on-line/virtual means (or adjusted to conform with COVID-19 safety protocols). The online platform will provide a resilient approach for the implementation of citizen engagement activities - given the COVID-19 related challenges of social distancing. The Information Disclosure Plan will be updated in concordance with the general situations in the country and the needs of the PAPs. According to the course of the COVID-19 pandemic in Moldova, the Project team will decide the best method and tools to inform, consult or collaborate with various stakeholders. Alternative arrangements should be considered until Covid-19-related restrictions are lifted in order to ensure a proper and safe engagement. Therefore, the engagement approaches need to be tailored in order to comply with the local restrictions and should be flexible, responsive to modifications of those restrictions.

**Table 5. Information Disclosure Plan**

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
All	Proposed Project Design	MARDE/RDA webpage Public consultations Online Platform	Before project appraisal	All	MARDE / PIU World Bank team
All	ESF documentation that is required for disclosure by the WB ESMF SEP RPF	MARDE webpage/Online Platform LPA webpage/Facebook page websites information boards/	As soon as each individual deliverable is completed	All	MARDE/PIU World Bank team

<b>Project component</b>	<b>List/ Type of information to be disclosed</b>	<b>Methods of disclosure proposed</b>	<b>Timing/Frequency</b>	<b>Target stakeholders</b>	<b>Responsible stakeholders</b>
	LMP				
<b>All</b>	GRM GBV/SEA/SH Health and safety impacts	Public consultations Online Platform LPA and WSS service providers webpage/Facebook page websites information boards/	During the project (continuous)	All	MARDE/PIU World Bank team LPA and service providers Contractors and Subcontractors

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
<b>Component 1: Access and quality of WSS services in small towns and rural areas</b>  <b>1.1: Expanding access and quality of WSS services</b>	Public outreach and communications consultancy; Tender documentation; ESMF, RAP	Post on the MARDE/RDA/LPA project website/ online Platform will include downloadable links for documents	After completion of specific documents	General public	MARDE/PIU
	Sub-project Implementation plan and resettlement action plan	Post on the MARDE project website/ online Platform	Before the start of works	Residents/business owners/vendors from the project area/vulnerable groups	MARDE/ PIU
	Sub-project implementation stage GRM	Participatory monitoring of CWSCs through online platform	During the project implementation	General public	CWSC, CSO, PIU, LPAs
<b>1.2: Improving WASH facilities in public institutions</b>	Education and behavior change campaigns on hygiene and hand washing	Leaflets Information boards Online platform	During the project implementation	General public school staff, students and health workers	PIU in collaboration with MHLSP and MECR
<b>Component 2:</b>  <b>WSS Sector and Development and Modernization</b>  <b>2.1: National WSS Institutional Capacity Development and Reform</b>	New legislation, policies and normative documents; National WSS Development Plan  Guidelines for tariff policy and costs for WSS services; Alternative mechanisms to guide tariff setting and introduce incentives to aggregate with rayon-operators.  Master Planning concept and	Post on the MARDE project website/online Platform/ e-mails Workshops	After completion of the deliverables	MARDE relevant National Authorities, LPA Service providers	MARDE/ PIU

<b>Project component</b>	<b>List/ Type of information to be disclosed</b>	<b>Methods of disclosure proposed</b>	<b>Timing/Frequency</b>	<b>Target stakeholders</b>	<b>Responsible stakeholders</b>
	methodology				
<b>2.2: Performance Improvement Program for WSS</b>	Performance Improvement plans and performance data Customer feedback for PIP	Workshops/ roundtable meetings/ (Check My Water/ Sanitation Roundtables)	Annually	Service providers, CWSCs General public	MARDE/ PIU
<b>Component 3 - Project Management</b>	Publish annual implementation reports, including implementation of SEP and other relevant ESF documentation	Post on the MARDE project website/ online Platform	Annually	All	MARDE/ PIU

## 6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

The overall responsibility with the project implementation rests with MARDE /P PIU. This unit will also employ i) Social specialist, ii) Environmental specialist and iii) Communication, community engagement and gender specialist who will be responsible for the coordination of the stakeholder engagement and communications activities under the project. The Project will have a dedicated budget for engagement and communications activities to ensure the implementation of this SEP and outreach activities envisaged.

**Table 6. The Project estimative costs for SEP activities (USD)**

Item	Quantity	Unit cost	Total cost (USD)	Remarks
Periodic stakeholder consultations	20	500	10000	On average once a quarter for 5 years
Capacity building for citizen engagement and delivery and support to public awareness campaign (trainings, workshops for local focal points and Citizen Water and Sanitation Committees (CWSCs), stakeholders)	1	240 000	240 000	Lump sum for 5 years
Project information (preparation of webinars/video and GRM PR-materials)			10000	Lump sum (around US\$2000 per year for 5 years)
Project website creation and maintenance (online platform)			6000	for 5 years
Technical support (WEBEX, Zoom) for conducting of online public, consultations, meetings with communities, interested parties	5	1200	6000	Lump sum (around USD 1,200 per year for 5 years)
Information materials development (brochures, leaflets, posters, other items)			12000	All project implementation phases
<b>Total</b>			<b>284000</b>	

## **7. GRIEVANCE REDRESS MECHANISM**

### **7.1 Objective of the GRM Mechanism**

Addressing grievances raised by individual affected by World Bank-funded projects is an important component of managing project risks and for mitigation strategies. The GRM can serve as an effective tool for early identification, assessment and resolution of grievances and therefore for strengthening accountability to beneficiaries. The GRM is an important feedback mechanism that can improve project impact and respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. With restrictions on movement, it is important that, where possible, staff managing grievances can access systems and work remotely to enable processes to work effectively.

The SEP will keep the local communities and other stakeholders informed about the project's activities, to specifically address GBV and SHE related issues. The grievance mechanism for project workers required under ESS2 will be provided separately.

### **7.2 Grievance Investigation and Resolution Process**

GRM at the Project level will be maintained during the entire period of Project implementation. The GRM will ensure that the all stakeholders can effectively be engaged in the Project design, implementation, provide project staff with practical suggestions/feedback on Project activities allowing them to be more accountable, transparent, and responsive.

This mechanism will follow the following principles:

- Grievances will be treated confidentially, assessed impartially, and handled transparently.
- The submitting and readdressing of the grievances will be free of charge for complainants.
- The MARDE/ PIU will ensure that all project-affected parties will have equal opportunity to submit their grievance in accessible way. The Project beneficiaries may use a range of contact options (telephone number, e-mail address and postal address, etc.). The GRM is accessible to all stakeholders.
- The channels for filling in grievance form should be disclosed on official sources;
- The MARDE/PIU will provide an opportunity to submit a grievance anonymously;
- Affected persons may raise a complain at any time of project related activity.
- The GRM is designed to be responsive to the needs of all complainants, including anonymous ones.
- All grievances, simple or complex, will be addressed and resolved as quickly as possible. The action taken on the grievance will be swift, decisive, and constructive.
- In cases where the aggrieved individuals or group is not satisfied with the outcome of the amicable mechanism, they will always be able to file to the court at any stage in the resolution process;
- All grievances will be registered and documented, and each grievance resolution process and communication will be systematically tracked;
- The channels for filing complaints will be listed in SEP and communicated to the public during the consultations.

The MWSSP will ensure equal and nondiscriminatory access to grievance mechanisms, but the special attention will be given to the most vulnerable groups: people less informed, with limited legal knowledge, the poorest community members, with limited or no access to internet; the Roma people that have the least access to education and the infrastructure required for proper understanding of how to file complaints through conventional channels. The project team will be working together with LPA, social assistances and community mediator (for Roma people) to provide access for complaints and ensure that the most vulnerable groups views are taken into account. Main findings from Feasibility studies and ESIA / ESMP will also be consulted with the public and the project team will ensure that all

proposals, including those from disadvantaged groups are analyzed and if the suggestions, requirements are reasonable will be included in the project design. The representatives of the vulnerable groups (NGOs, community leaders) will be included in the communication channels for ensuring the dissemination of information to diver's communities about Project preparation activities and also about planned public consultations.

The Social Specialist will serve as Grievance Focal Point(s) who will register the submitted grievances in the Grievance Log (database) and review within 15 (fifteen) calendar days, including the information verification, cross-checking, and analysis, and follow-up with the applicant as needed. As necessary, the Grievance Focal Point will involve the other relevant units' specialists in this activity.

*Channels to Make Complaints:* Due to COVID-19, the project has to provide the extend ways whereby grievances would be received. The suggestions/complaints can be submitted by e-mail, website, online platform, telephone, mail, grievance box on the site etc. The template for grievances will be provided. To make grievance mechanisms accessible to all stakeholders, it is helpful to make the procedures to submit grievances simple and easy to understand and provide an opportunity to submit a grievance anonymously. The channels for filing complaints will be listed communicated to the public during the consultations. The MARDE/PIU intends to establish the following channels through which citizens/beneficiaries/ PAPs can make complaints/suggestions/compliments regarding MWSSP activities:

- a) In writing:
  - by email: MARDE/ PIU
  - letters: MARDE/ PIU address /post box where the letters should be sent
- b) oral/verbal (which should be recorded in writing by the receiver):
  - by phone
  - verbal complaints addressed to the LPA, , RDA, PIU/ MARDE
- c) Both audio and written forms on online Platform.

For GBV, and particularly for SHE complaints, there are risks of stigmatization, rejection and reprisals against survivors. The GRM therefore have multiple channels through which complaints can be registered in a safe and confidential manner.

The GRM will be established at 3 levels:

**Level 1. Local level and on online platform.** The technical supervisor will be responsible for collecting the grievance from local residents and Contractor's employees. The channels for grievance submission will be disclosed near the construction site in big board format. For Contractor's employee special grievance box and e-mail will be available for submitting grievances (including anonymous). The technical supervisor will responsible for collecting grievances from Contractor's personnel.

The GRM will be also accessible on the online Platform and linked with the MARDE and RDAs websites [link](#) .

**Level 2. PIU.** the complainant will be able to submit grievance to PIU on:

online Platform: - [link](#)

e-mail: [larisa.cupcea@uipm.gov.md](mailto:larisa.cupcea@uipm.gov.md)

postal address: Larisa Cupcea, Chisinau, Alexandru cel Bun 51A street, MD 2012

by telephone: 0226254

**Level 3. MARDE.** Complainants may fill in online form following the provided platform link or fill in the template (Annex 4) and send to:

online Platform: - [link](#)

e-mail: [sergiu.tabacaru@madrm.gov.md](mailto:sergiu.tabacaru@madrm.gov.md); [cancelaria@madrm.gov.md](mailto:cancelaria@madrm.gov.md)

*postal address:* Sergiu Tabacaru, MD-2005 Chisinau, str. Constantin Tanase 9, Ministry of Agriculture, Regional Development and Environment  
*by telephone:* 022 204-547.

All the responsible personnel for GRM (local and regional focal points and MARDE/PIU) have to fill the Grievance/inquiry template record (Annex 5) for GRM Log.

The term of response will not exceed 10 working days. PIU will coordinate and monitor the responses to all complaints. The MARDE will be able to extend the term of addressing grievance up to 20 working days (the complainant will be informed about extension).

All land acquisition and resettlement preparation complaints will be referred to the local grievance redress committee (GRC<sup>24</sup>) that will be organized at District and Local Public Authority for resolution. GRCs will include representatives from the local community (community leaders) and project affected persons. The project will train the committees about their roles and responsibilities; communication with the PAPs, frequency of the meetings and the ways to engage and provide feedback to community members.

According to the Law on Expropriation for Public Use<sup>25</sup> provision is made for appeal against the expropriation conditions within 45 days of notification. Such appeals are settled within 30 days of the appeal by a Committee<sup>26</sup>, including three specialists and three landowners. Parties must be notified within five days of the adoption of the Committee's decision which would serve as the basis for compensation.

The GRM will assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. The list of GBV service providers/ NGOs is available [www.stopviolenta.md](http://www.stopviolenta.md)<sup>27</sup>. The Trust Line for Women - 0 8008 8008 for appropriate GBV and SHE support, will be disclosed during the public consultations and on the Project online platform.

### 7.3 Grievance Log

It is important that all complaints, including the anonymous ones, to be recorded in writing and stored in a database. Complaints received should be assigned a number that will help the assigned specialist to track progress via the database. The database should at least contain relevant information on the date of submission, sphere of issue, responsible party, deadline for the problem solving and feedback (positive or negative). The Grievance log will be submitted to the Bank on a quarterly basis for review.

*WB's Grievance Redress Service:* Stakeholders 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. Information on how to submit complaints to the WB's GRS is available at <http://www.worldbank.org/GRS>.

*The mechanism of addressing the complaints* will be the following:

**Stage 1: Receiving the Complaints/proposal/suggestion** (all together named future "complaint") do not matter what form of receiving: verbal, writing, online etc. An initial screening is done by the receiver - Social specialist and included obligatory in the GRM Log. All complaints that meet the admissibility criteria (related to the Project) are transmitted also to the concerned to obtain their views/proposals on the complaints or allegations of violations contained therein.

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<sup>24</sup> The Committee set up by decision of the local council for works of local and common interest. Law on Expropriation for Public Use, No. 488-XIV of 8 July 1999, art. 11 Resolving objections

<sup>25</sup> No. 488-XIV of 8 July 1999

<sup>26</sup> a commission set up by decision of the local council for works of local and common interest. Law on Expropriation for Public Use, No. 488-XIV of 8 July 1999, art. 11 Resolving objections

<sup>27</sup> <https://stopviolenta.md/index.php?do=feedback>

**Stage 2: The screening / reviewing of complaints.** The Social specialist together with other specialists investigates and decides on the complaint and assesses the case including whether the complaint alone or in combination with other complaints appear to reveal a consistent pattern of reliably attested future steps.

During its review, the Social specialist may propose to Project manager to decide to:

- dismiss a complaint if it is not admissible because is not related with Project directly or indirectly and inform the applicant;
- keep a complaint under review and request the other stakeholders concerned and/or the complainant to provide further information within a reasonable time;
- solve the grievance in 15 days and inform the applicant about the decision with explanations.
- If it is not in his competence to transmit a file containing all admissible communications as well as recommendations thereon to the MARDE and WB for further consideration.

**Stage 3: MARDE, PIU, WB.** The Ministries and WB may express their opinion to:

- discontinue its consideration of the situation;
- keep the situation under review for further consideration or additional information;
- transmit the situation to the other Moldova State institutions for their opinion or solving.

All the stages of solving grievances have to be documented and the resolution included in the GRM Log. The GRM log will be regularly (monthly base) sent to MARDE and WB for information.

## **7.4 Awareness Building**

The information about the Grievance Redress Mechanism will be available at the online platform and will be included in the communications conducted with the project stakeholders through the communications methods and tools that are part of this stakeholder engagement plan and communications plan under the project, including emails, website, workshops, meetings, focus groups discussions etc.

## **7.5 Roles and Responsibilities for GRM**

The responsibilities for the management of the GRM system include the following and may be updated from time to time in consultation with PIU, MARDE and the World Bank task teams.

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording complaints
- Notification to the complainant on the receipt and timeline to review a complaint
- Sorting/categorization of complaints
- Thorough review of the issues, including the causal link between project activities and alleged damage/harm/nuisance
- Decision-making based on such examination
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns  
Organization and implementation of information materials and awareness campaigns
- Reporting and feedback on GRM results.

## **7.6 Monitoring and reporting on GRM implementation**

Policies, procedures and regular updates on the GRM system will be made available for all stakeholders. The PIU will regularly track and monitor the status of complaints to ensure that all grievances are resolved within the established time-frame. The PIU will also provide and publish reports available to the World Bank team, and all stakeholders that would contain the following information:

- Status of establishment of the GRM (procedures, staffing, awareness building, etc.);
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved;
- Qualitative data on the type of complaints and answers provided, issues that are unresolved;
- Time taken to resolve complaints;
- Any issues faced with the procedures/staffing or use;
- Factors that may be affecting the use of the GRM/beneficiary feedback system;
- Any corrective measures suggested/adopted.

The PIU will compile a report summarizing SEP results on annual basis. This report will provide a summary of all public consultation issues, grievances and resolutions. The report will provide a summary of relevant public consultations' findings from informal meetings held at community level. This report will be available on-line for general population. Stakeholders should be reminded once again that the grievance mechanism is available and important. The SEP will be revised and updated, supplemented as needed with project-specific arrangements and will be publicly disclosed.

## REFERENCES

- ESS10 Guidance Notes, Stakeholder Engagement and Information Disclosure, The World Bank, 2018
- Executive Summary Moldova Water Security Diagnostic, The World Bank 2020
- Gender Gap and Citizen Engagement Analysis, The World Bank 2020
- Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, The World Bank, September 2018
- Stakeholder Engagement Plan (SEP) for Second District Heating Efficiency Improvement Project, MPIU – Regulatory context
- The Grievance Redress Service (GRS), The World Bank 2020
- The World Bank Environmental and Social Management Framework, The World Bank, 2017

## Annex.1 Structure of the field research, Gender Gap and Citizen Engagement Analysis

Locality	National	Soroca	Riscani	Cahul	Comrat
<b>INTERVIEWS:</b>					
Interviews female employees		2	3	2	2
Interviews male employees		4		3	
Interviews social institutions (schools, kindergartens)		1	1	1	
Interview with academia	3				
Interviews CSO, stakeholders	1		1	1	
Interview with sector association AMAC	1				
<i>Total interviews</i>		26			
<b>FOCUS GROUPS</b>					
FG customers		1	1	1	
FG CSOs		1			
FG employee		1		1	2
<b>Total FGDs</b>	<b>8</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>2</b>
Gender composition		Mixed	Mixed	Mixed, male	Female, Male

## Annex.2 Consultations for MWSSP

Activities	Methods/ Tools	Stakeholder involved <sup>28</sup>	Timeline	Purpose of consultations:
Meeting with MECR and MHLSP (component 1.2 on WASH in Social institutions)	On-line meeting	MECR MHLSP MARDE EPIU OEA-PM  (9 participants)	20 November	to inform about the project; to identify the selection of criteria for institutions and the proper method to consult the beneficiaries of WASH component; to discuss the mechanism of stakeholder engagement and grievance, the mitigation strategies for complaints.
Information placed in public places	Notes/leaflets Public places LPA, RDA websites Facebook, Viber groups	Utility customers/ General population from localities involved in the project	20-25 November	to inform about the project components and the following consultations on ESF documentation;
Information Note for Service Providers  Component 2: Strengthening of capacities for Water Sector Modernization)	e-mails	Water and sanitation service providers ( <i>the Information Note for Service Providers has been sent to LPAs for dissemination to the local water and sanitation service providers.</i> ) Congress of Local Authorities from Moldova (CALM); Moldova „Apă-Canal” Association.	20 November	to inform about the project components and the following consultations on ESF documentation
Meeting with LPA and Service Providers, RDA	On-line meeting	<b>LPA</b> Sorooca mayoralty Mayor, Comrat mayoralty Costesti, Rascani Cahul mayoralty <b>Service Providers</b> Apa Canal Sorooca Apa-Canal Cahul Apa-Canal Costesti SU-Canal Comrat Municipal Enterprise (11 participants)	26 November 10.00	to present the concept and importance of SEP; to discuss mechanism of grievances.
Information Note for educational institutions and health centers	e-mails	Representatives of educational institutions and health centers ( <i>the information has been disseminated to all education and health departments at the rayon level, and onwards</i> )	23 November	to inform about the project and the following consultations on ESF documentation; to ask for feedback/ suggestions on the selection criteria and consultation of

<sup>28</sup> List of participants in Annex 4

Activities	Methods/ Tools	Stakeholder involved <sup>28</sup>	Timeline	Purpose of consultations:
		<i>to the educational and health institutions)</i>		beneficiaries of WASH component
Other discussions with interested parties  (NGOs, Local leaders etc. )	In-depth interviews  On-line meeting	Congress of Local Authorities from Moldova (CALM); Local water operators and community associations ( <i>invitation for participation was sent via CALM and LPAs</i> ) Moldova „Apa-Canal” Association  Regional/ local CSO  (26 participants)	27 November 10.00	to inform about the project components and the following consultations on ESF documentation; Identify the best ways to involve disadvantage and vulnerable groups;

## **Annex.3 Summary of the virtual stakeholder consultations**

### **Public Consultation with WASH partners, (20.11.2020)**

#### **Participants:**

1. Dorin Andros, State Secretary, Minister of Agriculture, Regional Development and Environment (MARDE)
2. Ion Şalaru, Deputy Director on Prevention of Noncommunicable Diseases and Health Promotion, National Agency of Public Health, Moldova
3. Vladimir Bernic, Head of division, Ministry of Health, Labour and Social Protection
4. Victor Paginu, Principal consultant, Ministry of Education, Culture and Research of the Republic of Moldova
5. Maria Valcu, Deputy Director, Office for the Management of Foreign Assistance Programs
6. Eugenia Ganea, WB Gender Consultant
7. Tatiana Echim, WASH expert, EPIU
8. Larisa Cupcea, project coordinator, EPIU
9. Natalia Vladicescu, Social Expert, EPIU

Presentation of the components of “Moldova Water Security and Sanitation Project”, with emphasis on the WASH component. This project is developed under state policies in the field of water supply and sanitation (Moldova’s Water Supply and Sanitation Strategy (2014-2028), the Environmental Strategy for 2014-2023 and the Action Plan for its implementation, The River Basin Management Plan for Danube-Prut and Black Sea river, The River Basin Management Plan for the Dniester river) and covering activities to improve the water and sanitation infrastructure, the institutional and regulatory framework in this field, is the issues required to be discusses among the participants of the meeting.

Mr. Şalaru informed us that the current studies/evaluations regarding water and sanitation in educational institutions are outdated, for preschool institutions, they are from 2009, and for schools, from 2015. During this period the situation has changed significantly and therefore, a data update is needed. Regarding the water and sanitation infrastructure in the health centers, there is an evaluation study, conducted in 2019, which targeted only 20 medical institutions. According to the specialists, when it comes to access to water and sanitation facilities, the most disadvantaged region is the Northern Region of the country, including Riscani and Soroca District.

It was emphasized that the maintenance mechanisms for sewage treatment plants and/or facilities built should be considered to ensure the WASH conditions to be functional in the future. According to the specialist, the situation regarding the water and sewerage infrastructure in the medical centers is more deplorable given when there were fewer opportunities to finance them. Furthermore, another problem for medical institutions would be the safe disposal of waste. He mentioned that unlike the educational institutions, no technical documents were developed for the medical centers for the construction works of the WASH facilities.

The representative of the Ministry of Education, Culture and Research mentioned that there are educational institutions that are disqualified from projects of water improvement and sewerage infrastructure (a recent example being the projects funded by FISM), access to sanitation due to lack of wastewater treatment plants in given localities. According to him, the infrastructure of WWS from these buildings are in the most precarious situation and solutions must be identified for these institutions as well.

At the moment around 361 educational institutions (mostly from rural areas), about 30% of them have outside toilets. Solutions are constantly being sought to provide water and sanitation facilities inside buildings. In this regard, the need for clear criteria for inclusion in the project of potential educational and health institutions was clarified.

The discussion also addressed possible criteria for including the institutions to benefit from this project. It was rumored that EPIU all together with the WASH specialist in collaboration with WB will develop a questionnaire that will assess the situation of water and sewerage infrastructure in social institutions, and the partners from ministries will provide the necessary support in conducting this assessment.

The line ministries shall distribute the Information Note within the education and health institutions regarding the initiation of this project and will facilitate the subsequent consultation with the selected managers and institutions, the beneficiaries of the educational and health services.

#### **Public consultation with RDA, LPA, CALM, Utilities providers, (26.11.2020)**

##### **Participants:**

1. Valerii Ianioglo , Director, Regional Development Agency Gagauzia
2. Nelu Glasu, Mayor, Costesti, Rascani
3. Mr. Serghei Anastasov, Mayor, Comrat mayoralty
4. Cara Ira, Comrat mayoralty
5. Ludmila Malai, Congress of Local Authorities from Moldova (CALM) Association
6. Ion Anici, Apa Canal Soroca
7. Aureliu Overcenco, environmental expert, Office for the Management of Foreign Assistance Programs
8. Maria Valcu, Deputy Director, Office for the Management of Foreign Assistance Programs
9. Vitalie Cernomoret, Water and sanitation specialist, EPIU
10. Larisa Cupcea, project coordinator, EPIU
11. Natalia Vladicescu, Social Expert, EPIU

The presentation of the components of “Moldova Water Security and Sanitation Project”. The participants of the meeting mentioned that they want to find out more about the subprojects from their regions, localities. Knowing information about the activities, specific works financed within this project, who will be responsible for implementation, what are the amounts allocated for each subproject, etc. were the issues participants were interested in. The EPIU representatives specified that all these details would be known after the feasibility studies, and all of their suggestions and recommendations would be analyzed and the intervention priorities will be established by the mutual agreement.

The RDA’s representatives insisted on the clarity about the level of their involvement and about the responsibility of the regional agencies, so that could have information on the resources they would need, including the human resources that would be involved in this process.

The participants of the meeting from Comrat and Soroca mentioned that this is a project expected by their citizens, given the fact that there are problems with sewage treatment plants and/or the outdated water and sewerage system, which requires permanent repairs, and these problems are almost daily on the LPA agenda.

The LPA representatives, and therefore the other participants, think that the population should be informed after data about the period of the project is known, given the fact that citizens are expecting immediate action. The mayor of Costești specified that the supply of drinking water from the Prut River ("Prut Cluster") has been discussed since 2015 and the inhabitants of the region are already bothered by the delay of the process and want to see this process finished. EPIU representatives discussed the importance of informing, consulting and involving the population in decision-making from the initial phases of the project, including its design with those present back then. Thus, LPA representatives and the water and sanitation service providers will place different announcements on the expected components of the project " Moldova Water Security and Sanitation Project " in public spaces and on the institutions’ websites, on social networking groups and will inform the civil society about the public consultations.

Some participants have mentioned that during the COVID-19 pandemic, different online tools and platforms should be used for consulting the population, . Besides that, some mayors revealed that they wish to implement alternatives online communication tools in their community (Viber, Facebook, etc.) for informing and consulting the population, after the positive experiences reported by their colleagues from other localities. Of course, the old ways of consulting the residents could also be made, such as opinion polls, meetings with citizens, etc. According to some LPA representatives, it would be more useful to have leaflets so that they can be distributed to the population, discussed in the community between relatives and neighbours about this project and its residents to have a clearer opinion about the project's components, the responsible institutions and the financial resources allocated for this purpose. It was mentioned that the existence of implementation units at a local level will facilitate informing the population and its involvement in the project activities. The briefing information and local councils/local councilors' consultation about the activities was needed to be carried out at a locality level, but only when there shall be clarity in this regard.

If in cities there are several possibilities for communication (online, telephone, filing complaints at the mayor office or the water and sewerage services' provider) for the population of Costesti city is a habit calling the mayor and/or the director of the company Apa-Canal Costesti, only in these cases there is no record of complaints (?). When it comes to providers in the larger cities (Soroca, Cahul), accounting for the complaints about the services is made and an annual report is generated. However, the mechanism, the complaints regulation is still being drafted. It is confirmed from LPA's side that the water and sanitation service providers shall improve the tool for submitting complaints, recording and managing them.

#### **Public consultation with RDA North, Utilities providers, CSOs (27.11.2020)**

##### **Participants:**

1. Maria Prisacari, director, RDA North
2. Curcovici Pavel, RDA North, Monitoring and Evaluation Specialist
3. Ala Cucu, head of the monitoring and evaluation department, ADR Nord

##### **Utilities providers:**

4. Anici Ion, Apa Canal Soroca
5. Savioglo T., Director, SU-Canal Comrat Municipal Enterprise
6. Slavic Cebanu, Financial Director of SA "Apa-Canal Cahul"
7. Utilities providers from Strasenji, Ungeni, Cantemir (4 persons)

##### **CSOs:**

8. Vadim Șterbate, reporter, Newspaper „Observatorul de Nord”, Soroca
9. Diana Mititelu, “Perspectiva” NGO, Cahul
10. Onica Valentina, "Casa Sperantelor Soroca", NGO
11. Palamaru Ekaterina, Compagnie Generale de Travaux D'Hydraulique LTD
12. Boris Ivasi, former president of Soroca district
13. Other Communities Members - 6 persons
14. Veaceslav Vladicescu, WB Consultant
15. Maria Valcu, Deputy Director, Office for the Management of Foreign Assistance Programs
16. Larisa Cupcea, project coordinator, EPIU
17. Vitalie Cernomoret, Water and sanitation specialist, EPIU
18. Natalia Vladicescu, Social Expert, EPIU

The components of the Moldova Water Security and Sanitation Project were presented. Given the presence of a wider audience, emphasis was placed on the WASH component, but also on Component 2. Strengthening capacities for WSS sector modernization.

The service providers knew that only a few districts were included in the project and were more interested in community project procedures than in the Component 2. Strengthening capacities for WSS sector modernization component.

Specific information on sub-projects was requested, also more clarity - on the activities planned in each locality or at least the specification when this information would be available. Participants enquired about the timing the infrastructure works would start. The EPIU representatives stated that these issues are still being analyzed, discussed and followed up, as soon as these details would be available, all those interested parties would get the information about it. The most active were stakeholders from Soroca and UTAG where sanitation projects will be implemented.

The need to analyze the durability and sustainability of investments, as well as monitoring the quality of equipment and works was discussed. An important element in this regard is the water source, the quality of water delivered to the population. One of the CSOs members asked to what extent the project is in line with state policies in this area. Other question was about the extensions of the water and sewerage network in Soroca district. Veaceslav Vladicescu explained that this Project is perfectly in line with state policies on access to water and sanitation. The project on sanitation will be implemented in Soroca municipality, solving the problem of the treatment plant. Some participants requested specific details regarding the type of treatment plant, its capacity, how the works will be carried out and who will execute them.

RDA North specified that the project must also focus on informing the population. From their experience, the methods of communication with the population must be adapted to the specifics of localities, door-to-door for rural areas and online for urban. Awareness campaigns are needed, and in this regard the work of local committees seems to be a method of effective involvement and monitoring by the community. There were exemplified projects with EU funding sources implemented through the GIZ that RDA North manages. These committees include: implementers, LPA representatives, CSOs, local activists, etc. These committees have meetings where they are informed about the project activities, are involved in decision-making activities and after that they engage community members if it is necessary. Another suggestion referred to the contracting of information and consultancy services from NGOs working with the population in this field. Another suggested mechanism is the Regional Council for Northern Development, 4 people from each district are involved in this council, usually the President of the District, a delegate by CALM, a representative of the CSO and a representative of the business environment. This group also has a decision-making function within the RDA with reference to the district it represents.

All actors are waiting for the next steps in the realization of the project, and the questions, specific suggestions will appear when more details about the sub-projects in each locality will be known.

#### **Annex.4 Grievance Registration Form**

Reference No:

*Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent. In case of anonymous grievances, the decision will be disclosed at the online **Platform***

First Name \_\_\_\_\_

Last Name \_\_\_\_\_

I wish to raise my grievance anonymously

I request not to disclose my identity without my consent

Contact Information

*Please mark how you wish to be contacted (telephone, e-mail).*

By Telephone: \_\_\_\_\_

By E-mail \_\_\_\_\_

I will follow up the resolution at the website as I want to remain anonymous

Preferred Language for communication:  Romanian  Other (*indicate*)

Description of Incident or Grievance (*What happened? Where did it happen? Whom did it happen to? What is the result of the problem? Date of Incident/ Grievance*)

One-time incident/grievance (date \_\_\_\_\_)

Happened more than once (how many times? \_\_\_\_\_)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Please return this form to: PIU, Larisa Cupcea, Chisinau, Alexandru cel Bun 51A street, MD 2012

## Annex.5 Grievance/inquiry record

<b>GRIEVANCE/INQUIRY RECORD (Form A)</b>				
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attach any supporting documentation/letters as relevant.</i>				
Date Grievance Received:			Name of Staff Completing Form:	
Grievance Received (check <input type="checkbox"/> ): <input type="checkbox"/> National <input type="checkbox"/> Regional (RDA) <input type="checkbox"/> Rayon <input type="checkbox"/> City/Village				
Mode of Filing Inquiry or Grievance (check <input type="checkbox"/> ): <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____				
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	Regional	Rayon:	City/ Village:	
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				

- |             |   |
|-------------|---|
| Category 1  | Social Safeguards   |
| Category 2  | Environmental Safeguards  |
| Category 3  | Grievances regarding violations of policies, guidelines and procedures                                |
| Category 4  | Grievances regarding contract violations  |
| Category 5  | Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns |
| Category 6  | Grievances regarding abuse of power/intervention by project or government officials                   |
| Category 7  | Grievances regarding staff performance  |
| Category 8  | Reports of force majeure  |
| Category 9  | Grievance about project interventions   |
| Category 10 | Other   |

Who should handle and follow up on the grievance:
Progress in resolving the grievance (e.g. answered, being resolved, settled):