#### REPUBLIC OF MOLDOVA

### MINISTRY OF FINANCE MINISTRY OF ENERGY



## SUSTAINABLE TRANSITION THROUGH ENERGY EFFICIENCY IN MOLDOVA (STEEM) (P500560)

# STAKEHOLDERS ENGAGEMENT PLAN (SEP)

Chisinau 2024

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#### ABBREVIATIONS AND ACRONYMS

CERC	Contingent emergency response component
C-ESMP	Contractor's Environmental and Social Management Plan
CPF	Country Partnership Framework
C-LMP	Contractor's Labour Management Plan
DH	District Heating
DHEIP	District Heating Efficiency Improvement Project
DHEIP-2	Second District Heating Efficiency Improvement Project
EE	Energy efficinecy
EEA	Energy Efficiency Agency
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
EU	European Union
FY	Fiscal Year
GoM	Government of Moldova
GBV	Gender Based Violence
GHG	Net greenhouse gas
GRM	Grievance Redress Mechanism
IHS	Individual Heating Substation
MoE	Ministry of Energy
MoER	Ministry of Education and Research
MoH	Ministry of Health
MEPIU	Moldova Energy Projects Implementation Unit
MJ	Mega Joules
NCSE	National Center for Sustainable Energy
NGO	Non-governmental organization
PAP	Project Affected Parties / Persons
PBCs	Performance-Based Conditions
PDO	Project Development Objective
PPA	Public Property Agency
SEP	Stakeholder Engagement Plan
TE	"Termoelectrica" S.A.
USAID	United States Agency for International Development
WB	World Bank

#### **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 providing stakeholders with opportunities to express their views on project opportunities, risks, impacts and mitigation measures by gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

**Disadvantaged and Vulnerable Stakeholders** - Individuals or groups 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. Such an individual/ group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and may require specific measures and/or assistance to participate. Such measures take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

**Disclosure** – The provision of information as a basis for consultation with project stakeholders. Involves prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders.

**Engagement -** A continuous two-way process in which an implementing agency, company or organization 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 Assessment -** An assessment comprising various social and environmental studies which aim to identify project risks and impacts and design appropriate mitigation measures to manage these and to enhance positive impacts and outcomes.

**Grievance Redress Mechanism** - A process for receiving, evaluating, and facilitating resolution of concerns and grievances from project-affected parties related to environmental and social performance of the project as well as other project-related concerns from citizens and other interested stakeholders. This may utilize existing formal and information mechanisms supplemented as needed with project-specific arrangements but does not prevent access to judicial remedies.

**Non-Governmental Organizations -** Private organizations, often not-for-profit, that facilitate community development, local capacity building, civil society 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** - Project-affected and other interested parties. These are individuals or groups who are affected or likely to be affected by the project, and those who may have an interest in the project and/or the ability to influence its outcome, either positively or negatively. This may include beneficiary business enterprises, partner organizations, workers and their organizations, local communities, national and local authorities, neighboring projects, and nongovernmental organizations.

**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.

Buildings, which will address the CPF call for an urgent nationwide focus on efficient energy use.

#### 1.1.2. Project Development Objective and Key Results

The Project Development Objective (PDO) is to reduce energy use in existing public buildings and district heating sector in Moldova.

#### **PDO Level Indicators**

The progress towards achieving the PDO will be measured by the following indicators:

- (a) Projected lifetime energy savings attributed to investments linked to the project (CRI; Mega Joules (MJ)).
- (b) Net greenhouse gas (GHG) emissions (CRI, Metric tons/year).

#### 1.1.3. Project Components

The project components are the following:

Table 1: Project's components and subcomponents

Component 1 – EE investments in public buildings (US\$48 million - IBRD)

Sub-component 1.1. EE renovation in education and central government buildings (US\$30 million).

This sub-component will finance the retrofit of public buildings focusing on educational facilities, which will include: (i) standard energy efficient retrofit measures, such as thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system, and replacement of lighting using well-proven technologies and equipment for energy efficiency improvements in end-use application, and (ii) installation of heat pumps, solar thermal collectors and rooftop solar PV if technically feasible and economically viable. The sub-component will test the revolving energy savings mechanism in two public projects based on the EE fund in public buildings to be created by the Government with donor support. Beneficiary eligibility criteria for Subcomponent 1.1, which will be used at the screening stage, include: (i) full ownership by a governmental agency and primary used for public services; (ii) preliminary confirmed structural soundness of the buildings (in terms of structural durability and safety of the construction); stability of the building, no seismic and construction damages; (iii) secured prospective use of the facility, and absence of plans for closure or downsizing or privatization; (iv) no other users occupying the building or parts; and (v) the building has been constructed between 1950 and 2013, as it is expected that relatively new buildings have lower demand for retrofit. Subproject eligibility criteria, which will be confirmed after completion of the energy audit of each subproject, include: (i) the energy audits confirms at least 20 percent energy savings after renovation compared to real consumption and normative demand baseline, an economic payback period of less than ten years, and (ii) no significant capital repairs or mayor renovation over the last five years, to avoid renewed EE intervention for buildings with already better energy performance. In addition, buildings which may trigger ESS5 (land acquisition) will not be eligible for funding.

Sub-component 1.2. District heating upgrades (US\$15 million).

This sub-component will finance improvements in the heat supply by central district heating (DH) in education facilities and public administration, including the buildings selected under sub-component 1.1. Public buildings will be enhanced through installation of individual DH substations at building level and DH network upgrades using well proven technologies and equipment. The implementation of about 350-400 individual heat substations (IHS) will be implemented under the supervision of the public utility Termoelectrica. DH network up-grades comprise minor DH distribution pipeline replacement (few hundred meters, including valves) from the old central DH heating point to the new building-based IHS. The sub-component will support on-going Government's efforts to set up a sustainable mechanism for energy efficiency in the framework of the Super ESCO model proposed under development. It will finance: (i) operating costs and marketing activities of the mechanism, and (ii) carrying out energy audits, detailed designs and technical specifications, technical reviews of detailed designs and technical specifications, construction supervision, energy performance certificates and other technical studies. Disbursements for this sub-component will be subject to the legal establishment of a sustainable mechanism in terms and conditions acceptable to the Bank.

Sub-component 1.3. Initial capitalization of sustainable mechanism for EE (US\$3 million).

This component will be linked to two performance-based conditions (PBCs) to support the creation of a public revolving fund. This component will finance energy efficiency investments in two public pilots to evaluate actual savings and test the legal and contractual arrangements required to set up a revolving mechanism. This activity will be coordinated with the Super ESCO scheme piloted by USAID. Disbursements would be conditioned to the achievement of two regulatory changes: (i) creation of a public revolving fund; and (ii) amendments to the regulations to allow public institutions to deposit monetized energy saving in a revolving fund. PBCs need to be discussed with the government.

#### Component 2 – Implementation support and technical assistance (US\$2 million - IBRD).

This component will include: (i) MEPIU staff and operational costs; (ii) capacity building for staff at Ministry of Energy (MoE), National Center for Sustainable Energy (NCSE) Termoelectrica SA (TE) and MEPIU; (iii) supply and installation of Energy information system at EEA; (iv) support to MoE in the preparation of an Energy Efficiency Action Plan 2024-2030, and (v) other technical assistance, study tours and workshops.

#### Component 3 – Contingent emergency response component (US\$0 of IBRD).

This component would have zero allocation of financing to allow for rapid reallocation of proceeds of uncommitted financing in the event of an eligible crisis or emergency. For the CERC to be activated, and financing to be provided, the Government of Moldova will need to (a) submit a request letter for CERC activation and the evidence required to determine the eligibility of the emergency, as defined in the CERC manual; (b) have an Emergency Action Plan, including the emergency expenditures to be financed; and (c) meet the environmental and social requirements as agreed in the Emergency Action Plan and related environmental and social instruments.

#### 1.2. Anticipated Project Impacts

Under subcomponent 1.1 the project will finance the retrofit of public buildings focusing on educational facilities, which will include: (i) standard energy efficient retrofit measures, such as thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system, and replacement of inefficient gas and coal boilers by fuel switch to wood pellets, and replacement of lighting, using well proven technologies and equipment for energy efficiency improvements in end-use application, and (ii) if

technically feasible and economically viable, advanced energy technologies for space heating, such was heat pumps or solar thermal collectors, and rooftop solar PV to cover own electricity demand. Specific measures for each subproject will be determined based on professional energy audits and designs. Technology risk may occur advanced technology applications on design, installation and O&M at moderate level. Capacity building measures will be important to reduce those risks. Limited additional funding (up to 10 percent of total investment costs per subproject) may be provided to finance 'ancillary measures' to ensure reasonably full renovation or longevity of the investment (e.g., replacement of old gutters and down spouts to ensure that building envelops don't get damaged by water) and a minimum level of improvement of sanitary facilities (i.e. washing rooms).

The educational buildings can be owned by local public authorities (LPAs), but it will also include buildings owned or managed by central public authorities (CPA) from the Republic of Moldova.

The territory of the Republic of Moldova is administratively organized, into administrative-territorial units: villages, cities, districts/rayons and the autonomous territorial unit Gagauzia (*see Figure 1*).



Figure 1: Administrative -territorial division of the Republic of Moldova

The subcomponent 1.2 will comprise technical measures to improve the heat supply service by central district heating (DH) and will be realized by installing individual DH substations at building level, combined with DH network upgrades, both using well proven technologies and equipment. The network that will be upgraded can be underground and aboveground. The type of the required civil works will be established based on the network type, dimensions and characteristics, but specifically for underground networks the civil works include soil excavation, equipment and materials transportation and their placement near the site, changing of the old networks, loading of the wastes and old equipment and their transportation, plugging the networks with soil and landscaping/repairing the territory and roads damaged during the works. Adequate implementation will be ensured through regular supervision by qualified companies and commission testing after completion.

This shall be implemented in the city of Chisinau within the following sectors<sup>1</sup>: Ciocana, Riscani, Centru, Buiucani and Botanica, the boundary of the Chisinau Municipality (*see Figure 2*). The district heating is provided in about 4410 buildings form Chisinau, including circa 487 public buildings, 821 businesses, 258 single-family (individual) houses, and over 2844 apartment buildings including more than 210,000 apartments TE also serves hot water to 1591 apartment buildings, 205 public units and 174 commercial enterprises.

The District Heating System (DHS) is the main heating source for the housing sector in Chisinau municipality, where about 500,000 inhabitants rely on this source in providing themselves with living conditions. After several years of poor investments in the system, many parts of the system need be replaced and/or modernized to reduce heat supply costs<sup>2</sup>. There are four main heat and hot water production plants in Chisinau municipality: (i) Source-1/ Combined Heat and Power Plant (CHPP)-2, (ii) Source-2/CHPP-1, (iii) HOB West and (iv) HOB South. The heat networks in Chisinau municipality are shown in the *Figure 3*.

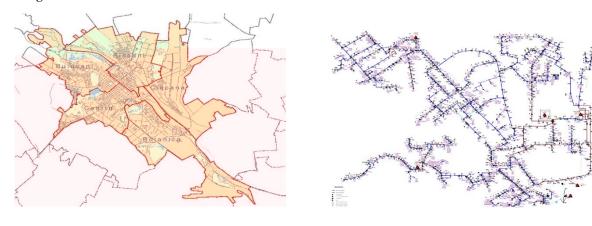


Figure 2:Boundaries of Chisinau Municipality Figure 3:Scheme of heat networks in Chisinau

The joint-venture company Termoelectrica S.A. (TE) is currently the main producer of electricity in cogeneration mode and the single DH producer, supplier and distributor of heat in Chisinau and its suburbs.

<sup>&</sup>lt;sup>1</sup> Source: Law no. 136/2016 The Status of the Chisinau Municipality - <a href="https://www.legis.md/cautare/getResults?doc\_id=130399&lang=ro#">https://www.legis.md/cautare/getResults?doc\_id=130399&lang=ro#</a>

<sup>&</sup>lt;sup>2</sup> Source: ESIA & ESMF for DHEIP2 - <a href="https://termoelectrica.md/wp-content/uploads/2021/06/ESIA-ESMF">https://termoelectrica.md/wp-content/uploads/2021/06/ESIA-ESMF</a> SACET2.pdf

The main focus for energy efficient retrofit is set on educational buildings, in particular schools, justified by the following aspects: (i) educational facilities have the largest share in number, floor area and energy consumption, (ii) enabling room comfort benefits to the highest number of building users; (iii) educational facilities have high baseline energy consumption, compared to other types, such as administrative buildings, which indicates highest energy saving potentials at financially viable results; (iv) option to reduce preparation and transaction costs by bundling of sub-projects of by region, or standard construction type and dealing with one central governmental agency with the overall responsibility and ownership of education facilities; (v) lower risks of technical feasibility of building envelop measures, compared to monumental, administrative (case cultural heritage facades) and complex hospital buildings, and (vi) enabling additional social co-benefits, as schools are often used for cultural and sport events by the local community. Through energy efficiency measures in school's energy costs can be reduced, which reduces the burden of the facility to manage the mostly insufficient financing of operation expenses by central government funds.

To be eligible, facilities must meet the following basic eligibility criteria: (i) confirmation of public ownership; (ii) structural soundness of the facility (i.e., absence of major structural damages that may jeopardize the integral stability of the building); (iii) absence of plans for closure, downsizing or privatization; (iv) detached, single use buildings to achieve significant energy savings and enable cost reduction benefits, and (v) no major retrofits implemented over the past 5 years.

Under subcomponent 1.2. the heat supply by central district heating (DH) to selected public buildings will be enhanced through installation of individual IHS at building level, which is combined with DH network upgrades, using well proven technologies and equipment. Proper implementation will be ensured through regular supervision by qualified companies and commission testing after completion. Under this subcomponent no interventions are foreseen to increase the performance of DH boilers or switch to cleaner fuel, nor major DH transmission and distribution pipeline replacement to reduce DH losses. DH network up-grades comprise only minor DH distribution pipeline replacement (few hundred meters, including valves) from the old central DH heating point to the new building-based IHS.

The selection of subprojects will be conducted as follow:

A) for public building retrofit component: data of the public building inventory, comprising more than 3.000 facilities have been analyzed, aggregated, grouped on type and ownership and finally ranked on the baseline energy consumption per square meter (kWh/m²). Priority for nomination into the STEEM pipeline A is put on facilities with high specific baseline consumption as that is an indicator for expected high energy savings as result of the retrofit. Additional factors for selection will be determined by the interministerial working group, such as regional distribution balance, facilities of high social importance or high occupation level.

B) The selection of sub-projects that will include the improvement of DH supply service will be undertaken in close coopetition with public utility Termoelectrica, applying technical criteria of demand for DH network balancing, and capacity of DH connection.

Of 10 Environmental and Social Standards (ESSs), five found to be relevant to the project. These are: ESS 1, Assessment and Management of Environmental and Social Risks and Impacts; ESS 2, Labor and Working Conditions; ESS 3, Resource Efficiency and Pollution Prevention and Management; ESS 4, Community Health and Safety and ESS 10, Stakeholder Engagement and Information Disclosure.

The project Environmental and Social (E&S) risks are both rated as Moderate. The project is not expected to have significant adverse environmental or social risks and/or impacts. The project supports energy efficiency (EE) renovation in public buildings and Individual Heating Substations (IHS) and network upgrades to reduce energy use, to optimize the efficiency of the district heating system and improve the quality of service. As such, the project will result in positive impacts in terms of energy conservation, reduction of GHG emissions and air pollution, and will also contribute to improved health outcomes and social sustainability. Building renovations could bring between 45-70% energy savings and comparable CO2 emission reductions. However, short-term risks are mostly related to small-scale civil works within existing facilities (public buildings – schools, administrative institutions; multi-apartment buildings and individual district heating systems and earth-moving works to upgrade/reconfigure short sections of district heating networks) under Component 1, including subcomponents 1.1. and 1.2.

The environmental related impacts are expected to be predictable, temporary, low in magnitude, and site specific without likelihood of impacts beyond the actual footprint of the project, reversible, and manageable in a predictable manner through the implementation of cost-effective mitigation measures in line with the national laws as well as the use of the World Bank's ESSs, Environmental, Health, and Safety Guidelines and Good International Industrial Practices.

The main environmental risks in this regard could be identified as: (a) impacts on ground and surface water, soil, and air contamination (dust and noise); (b) occupational health and safety (OHS) issues and access to work sites of pupils, teachers, staff and personnel as well as visitors during construction works; (c) inadequate waste management including hazardous waste (potentially of asbestos containing material) during construction works; (d) traffic disruption in adjacent residential and public buildings areas (depending upon specific location), transport and traffic safety at construction sites; (e) old electrical appliances; etc. Environmental issues likely to be associated with the activities under subcomponent 1.2 for the upgrading of IHS and related networks will include: noise generation; impact on soil and on water by the construction works; disturbance of traffic during construction and rehabilitation works; construction dust and wastes; finding and handling of hazardous materials (e.g. asbestos insulation) and workers' safety.

Social risks of the project are considered Moderate. Energy efficiency renovations under subcomponent 1.1 and installation of IHS under subcomponent 1.2 will result in social risks and impacts that are expected to be small in scale and low magnitude, and manageable in a predictable manner, as these physical works are temporary, and isolated to existing buildings that will be refurbished (i.e. schools, public buildings, apartment buildings). Upgrading and rehabilitation of existing district heating networks under subcomponent 1.2. will not require land acquisition. Potential adverse social risks or impacts include temporary disruption of services; access restrictions; and community and worker health and safety risks from exposure to dust or waste and other hazards, particularly for vulnerable individuals or groups who may be accessing sites throughout duration of works. The works under Components 1 are unlikely to involve large-scale labor force. Workers will mainly comprise small crews of qualified technicians are required for installing thermal insulation, high-quality energy efficient windows, and advanced equipment, and some semi-skilled workers for earth-moving subprojects.

# 2. PURPOSE AND OBJECTIVE OF THE STAKEHOLDER ENGAGEMENT PLAN

The effective stakeholder engagement will improve the environmental and social sustainability of the Project, enhance Project acceptance, and significantly contribute to successful Project design and implementation. Stakeholder engagement is an inclusive process conducted throughout the Project life

cycle. The SEP will support the development of strong, constructive, and responsive relationships between the Project's implementation entities and Project's beneficiaries in order to ensure the successful management of a Project's environmental and social risks.

The purpose of this SEP is to define an appropriate plan of actions for stakeholder engagement through the public consultation, equal participation and information disclosure throughout the Project cycle. The SEP outlines the ways in which the Project team and implementation entities will communicate with stakeholders and includes a Grievance Redress Mechanism (GRM) through which the people can raise concerns, provide feedback, or make complaints/grievances on Project activities.

Consequently, the objectives of this SEP are:

Provide guidance for stakeholder engagement such that it meets the WB's ESS 10 of ESF;

- (i) Identify key stakeholders that are benefitted, affected, and/or able to influence the Project and its activities;
- (ii) Identify the most effective methods, timing and structures through which to share Project information, and to ensure regular, accessible, transparent and appropriate consultation;
- (iii)Develop a stakeholder engagement process that provides stakeholders with an opportunity to influence Project implementation;
- (iv)Establish a formal grievance redress/resolution mechanism;
- (v) Define roles, responsibilities and resources for the implementation of the SEP;
- (vi)Define reporting and monitoring measures to ensure the effectiveness of the SEP and its periodical reviews based on findings.

#### 2.1. Stakeholder engagement principles

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: public consultations for the project(s) will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- Inclusiveness and sensitivity: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, internally displaced persons (IDPs), returnees, persons with disabilities, youth, elderly and those living in remote or inaccessible areas.
- Cultural appropriateness. The activities, format, timing, and venue will respect local customs and norms.

- Conflict sensitivity. Considering the complex country context and referring to the humanitarian principles of neutrality and impartiality.
- Gender sensitivity. Consultations will be organized to ensure that both females and males have
  equal access to them. As necessary, the implementing agencies will organize separate meetings
  and focus group discussions for males and females, engage facilitators of the same gender as the
  participants, and provide additional support to facilitate access of facilitators.

#### 2.2. Scope and Structure of the SEP

This document is a guidance on how to involve the public in all phases of projects, from their approval, throughout implementation and to their operation.

Scope of the SEP is outlined in the World Bank's ESS10. The engagement will be planned as an integral part of the project's environmental and social assessment and project design and implementation.

The Stakeholder Engagement Plan consists of the following Chapters:

- 1. Introduction, including Project Context and Description
- 2. Scope and objectives of the SEP
- 3. Regulatory Context
- 4. Previous Stakeholder Engagement Activities
- 5. Stakeholder Identification and analysis
- 6. Stakeholder Engagement Program
- 7. Resources and Responsibilities for implementing the Stakeholder Engagement Plan
- 8. Grievance Redress Mechanism
- 9. Monitoring and Reporting
- 10. References

#### Update of the SEP document

After selecting of sub project/ buildings where the planned investment under Components 1 and 2 will be implemented, an update of the SEP will be carried out (It will be included in Annex of this general SEP), focusing on selected public buildings, the disclosure package content and mechanism of engagement of stakeholders during the design, construction and operation stages.

#### 3. REGULATORY CONTEXT

#### 3.1. Relevant Moldovan Legislation

Moldova has the following citizen/stakeholder engagement legislation that relates both the right to access information and participation in policy development and decision-making:

#### 3.1.1. Relevant legislation for public consultation

 Constitution of the Republic of Moldova, 1994 - Republished. Latest amendments from 2016, 2017, 2019, 2022 and 2023

Article 32. Freedom of Opinion and Expression

1. Every citizen shall be guaranteed the freedom of thought and opinion, as well as the freedom of expression in public by means of word, image or any other means possible.

2. The freedom of expression may not harm the honor, dignity or the rights of other people to have and express their own opinions or judgments.

Article 34. Right of Access to Information

- 1. The right of a person to have access to any kind of information of public interest shall not be curtailed.
- 2. Public authorities, according to their as-signed competence, shall be committed to ensure that citizens are correctly informed.
- 3. The right of access to information shall not prejudice neither the measures taken to protect the citizens or the national security.
- 4. The State and private public media shall be bound to provide the correct information of the public opinion.
- 5. The public media shall not be submitted to censorship.
- Law on Access to Information no.982/2000, as amended in 2003,2011,2012,2015,2018 and 2023 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 on Environmental Impact Assessment no.86/2014, as amended in 2015, 2017, 2022 and 2023.

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 on Freedom of Expression no.64/2010, as amended in 2012, -2013,2015 and 2021

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 on Transparency in Decision Making no.239/2008, as amended in 2010, -2014 and 2016

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.
- Government Decision no. 967/2016 Regarding the public consultation mechanism with civil society in the decision-making process This decision sets the framework for consultation of civil society, describing the step-by-step tasks, roles and responsibilities of the authorities, including deadlines, consultation methods, and transparency of the adoption of decisions. It also recommends that local public administrations update their internal procedures related to the transparency of the decision- making process.
- Government Decision no. 11/2010 Regarding the creation of the National Council for Participation. This decision establishes legal norms for the creation of the National Council for Participation. This Council is created at the initiative of the Government as an advisory body, without the status of a legal entity, and aims to develop and promote the strategic partnership between public authorities, civil society and the private sector in order to strengthen democracy, with the aim of to involving the civil society in the policy decision- making process. However, the operation of the National Participation Council has not been regular.

#### 3.1.2. Relevant legislation for grievances redress

 Administrative Code of the Republic of Moldova no.116/2018, as amended in 2019, 2020, 2021, 2022 and 2023.

The administrative code establishes procedure for consideration of petitions of the RM citizens addressed to the relevant authorities/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.

The general term in which an administrative procedure must be completed is 30 days, unless the law provides otherwise.

The general term runs from:

- a) the date provided for in the law for the exercise of an established attribution;
- b) the date of registration of the request by the hierarchically superior public authority or by the control authority;
- c) the date of registration of the complete application, as the case may be with all the necessary documents, or from the date on which the petition was transferred to the competent public authority. If the application is not complete, the public authority proposes the petitioner to submit the missing documents and sets a deadline for this.

#### 3.1.3. Relevant legislation for support to vulnerable groups

- Civil Code of the Republic of Moldova no. 1107/2002 with the latest amendments from 2019, 2020, 2021, 2022 and 2023. which is based on the recognition of the equality of the participants in the relationships regulated by it, the protection of intimate, private and family life, the recognition of the inviolability of property, the freedom of contract, the protection of good faith, the protection of the consumer, the recognition of the inadmissibility of interference in private affairs, the need for the free realization of civil rights, to guarantee the restoration of the person's rights in which he was injured and to defend them by the competent jurisdictional bodies.
- Labor Code of the Republic of Moldova no. 154/2003 with the latest amendments from 2019, 2020, 2021 and 2023. This code regulates all individual and collective labor relations, control of the application of regulations in the field of labor relations, labor jurisdiction, as well as other relations directly related to labor relations.
- Law on social assistance no. 547/2003 with the latest amendments from 201, 2018, 2022 and 2023
   aims to determine the principles and objectives of social assistance, establish the right to social assistance, social assistance benefits and services, their beneficiaries, as well as the requirements for the staff of the social assistance system.
- Law on social services no. 123/2010, with the latest amendments from 2018, 2019, 2020 and 2022 establishes the general framework for the creation and operation of the integrated system of social services, with the determination of the tasks and responsibilities of the central and local public administration authorities, of other legal and physical persons empowered to ensure and provide social services, as well as the protection of the rights of the beneficiaries of social services.
- Law on employment promotion and unemployment insurance no. 105/2018, amended in 2019, 2021, 2022 and 2023. The purpose of this law is to prevent and reduce unemployment and its social effects, reduce the risk of unemployment, and ensure a high level of employment and adaptation of the labor force to the requirements of the labor market.

#### 3.2. World Bank Requirements

The WB's safeguard policies have been replaced in 2018 with the Environmental and Social Framework (ESF). Within the ESF, ten Environmental and Social Standards set out responsibilities for Borrowers. The Standards are designed to help Borrowers manage Project risks and impacts, as well as improve environmental and social performance, consistent with good international practice and national and international obligations. For a general overview of the ESF framework and all the standards in several languages, including English, French and Russian, please visit: <a href="https://www.worldbank.org/en/projects-operations/environmental-and-social-framework">https://www.worldbank.org/en/projects-operations/environmental-and-social-framework</a>

The Environmental and Social Standard on Stakeholder Engagement and Information Disclosure (ESS 10) defines the requirements for stakeholder engagement. The objectives of the ESS 10 are the following:

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

For the purpose of the ESS 10, "stakeholder" refers to individuals or groups who:

- a) are affected or likely to be affected by the project (project-affected parties); and
- b) may have an interest in the project (other interested parties).

The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances. The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements.

- a) The grievance mechanism is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Borrower will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and
- b) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.
- 1. The scope, scale and type of grievance mechanism required will be proportionate to the nature and scale of the potential risks and impacts of the project.
- 2. The grievance mechanism may include the following:

- a) Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a web site;
- b) A log where grievances are registered in writing and maintained as a database;
- c) Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
- d) Transparency about the grievance procedure, governing structure and decision makers; and
- e) An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.
- 3. The Borrower may provide mediation as an option where users are not satisfied with the proposed resolution.

ESS 1 Assessment and Management of Environmental and Social Risks and Impacts sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a Project supported by the Bank.

**ESS 2 Labor and Working Conditions** enhance the development benefits of a Project by treating workers in the Project fairly and providing safe and healthy working conditions.

Some of the objectives of this standard are:

- To promote safety and health at work.
- To promote the fair treatment, non-discrimination, and equal opportunity of Project workers.
- To protect Project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of Project workers in a manner consistent with national law.
- To provide Project workers with accessible means to raise workplace concerns

**ESS 4: Community Health and Safety** addresses the health, safety, and security risks and impacts on Project-affected communities and to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.

#### 3.3. Gap Analysis between the National Legislation and World Bank requirements

Table 2: Gap Analysis between the National Legislation and World Bank requirements

Table 2 : Gap Analysis between the N National legislation	The Project	
The national legislation does not have provisions for the development of a specific Stakeholder Engagement Plan for public consultations, however the requirement for public consultation and the procedure is clearly described in Law no. 239/2008 on transparency in decision-making and in Government Decision no.967/2016 on the mechanism for public consultation with civil society in the decision-making process.	Consultations with stakeholders and public involvement are an integral part in the development and implementation of the SEP.	Moldova currently does not contain express terminology and requirements for developing a Stakeholder Engagement Plan; however, it contains requirements for public consultations in the decision-making process. Although SEP requirements are not provided under the national legislation, the project has developed the present SEP and will carry out a comprehensive consultative process with project - affected persons, local and state authorities, other stakeholders as required through public disclosure meetings, individual consultations and public consultations.
1. The formal mechanism only. 2. The anonymous or submitted petitions without indicating the petitioner's postal or e-mail address are not examined. 3. No different approach depending on type of grievance or for different type of people.	<ol> <li>The formal or informal grievance mechanism.</li> <li>The mechanism will also allow for anonymous complaints to be raised and addressed.</li> <li>The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive.</li> </ol>	The project will establish, publicize, maintain, and operate an accessible grievance mechanism according to ESS 10.  To receive and facilitate resolution of concerns and grievances in relation to the Project, including anonymous grievances and SEA/SH 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 their concerns are addressed to the extent possible by the project.
The national legislation does not have provisions to establish a Project specific GM.	According to the ESS 10 and ESS 2 the Project specific GM should be established and be easily acceptable for all stakeholders at each stage of Project, including specific GM for project workers	The Project specific GM will be established for all stakeholders at each stage of the Project, including GM for all project workers <sup>3</sup> .

<sup>3</sup> Directly engaged people (MEPIU staff and consultants) and contracted workers (people employed or engaged through contractors/ subcontractors that will perform work for specific project activities).

## 4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

During the year 2023, the Ministry of Energy started the discussion with the World Bank on further opportunities for financing the energy efficiency investments during the supervisions missions carried out for the ongoing energy projects in Moldova (Power System Development Project and Second District Heating Efficiency Improvement Project).

In this context, in September 2023, the appointed World Bank's team and Ministry of Energy (MoF), Ministry of Finance (MoF) and other institutions involved in the ongoing energy projects implementation started the discussion on the new Project design, components, implementation arrangements and other requirements for the start of this new project.

The STEEM Project design is developed based on previous similar investments and the engagements related to those projects have informed project design of STEEM. The dissemination and consultation of the ESF package will be the first step in the dedicated information and engagement of the STEEM stakeholders and will build on recent and ongoing engagements from previous similar investments.

Several Projects with similar investments as those planned in components 1 and 2 are under implementation or are already completed in Republic of Moldova.

MEPIU implements at this stage two project with similar investments:

- *Moldova Energy Efficiency Project (MHEP)*, aiming to improve energy efficiency in public buildings, municipal and state owned, in the Republic of Moldova, including similar investments and activities as the activities planned under component 1 of the STEEM.
- Second District Heating Efficiency Project (DHEIP-2), increasing the efficiency of the District Heating system in Chisinau, including installation of individual heat substations and associated piping in selected public buildings like planned activities under component 1.2 of the STEEM.

MEPIU carried out a lot of information and engagement activities related to these types of investments both with the direct beneficiaries and other stakeholders. Consequently, based on the previous experience during the similar investment implementation the following key aspects related to engagement was determined:

- The person and institutions involved directly in project implementation can receive the information and provide feedback using the email, online and in person working meetings. They are interested to receive all type of information, including the reports, summary notes, official letters etc.
- The direct beneficiaries of the investments, such us the residents, community members, staff of public institutions would prefer the information provided in a short, accessible format that can be placed on web pages, on informative panels and social media or to be provided during the meetings, public consultation etc. The engagement for this group is efficiently to be ensured through direct engagement activities, such us the public consultation, group or individual meetings, considering that a large part of the feedback is received in meetings rather than through the web page, letters, etc. Also, the social media is one of the channels that people use of information and submission of some feedback (comments, suggestions, questions etc.).

The mentioned aspects above is taken into consideration at the development of the stakeholder engagement program for the STEEM Project.

The table below summarizes the engagement activities carried out by MEPIU under the ongoing Projects or related to the energy sector development, which justify and support STEEM design, preparation and further implementation.

Table 3: Summary of the meetings and previous engagement activities during Project preparation

Timing	Participants	Scope and Areas of discussion
Public Consultation - October 10, 2022	World Bank Representatives of the academic, governmental, and non-governmental environment, local public authorities, the business community	World Bank Group Country Partnership Framework (CPF) for the Republic of Moldova for the period of FY23-FY27, including the support the country's green, resilient and inclusive development, through Increased energy security and efficiency.
The session of the Sectoral Council in the field of external assistance in the energy sector - July 03, 2023	MoE, MEPIU, donors / IFIs and Ambassadors	Ensuring energy security in times of crisis and energy transition.
July 05, 2023	MEPIU Experts team for support of the Government of Moldova	Needs assessment for the potential project implementation, to be financed by UE or other donors, which will support increasing security and energy efficiency of the Republic of Moldova.
September 04– 07, 2023.	World Bank team GoM representatives: Ministry of Finance (MoF), Ministry of Energy (MoF), MEPIU, EEA	To start preparation of the STEEM project, responsibilities for the preparation of the following documents by project appraisal: Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM), Labor Management Procedures (LMP) including worker's Grievance Mechanism, and Environmental and Social Commitment Plan (ESCP).
September 06-20, 2023	MEPIU's and TE's teams Residents of the Chisinau city Mangers of the public buildings, residents' representatives	<ul> <li>The benefits of the IHS for the public buildings, the intention to continue the investments for the installation of the IHS and the upgrade pf the DH networks (the photos is attached to this SEP).</li> <li>The main questions and required aspects to be clarified for the participants were related to economic benefits of these investments and how the residents can reduce the bill after installation of the IHS. The automatic change of the temperature in the building depending on the outside temperature and the possibility of producing hot water were among the most important benefits appreciated by the participants.</li> </ul>
September 07, 2023	European Union in the Republic of Moldova,	The identified energy efficiency measures based on the developed energy audits in the public institutions.

Timing	<b>Participants</b>	Scope and Areas of discussion
	European Investment Bank,	
	European bank for	
	Reconstruction and	
	Development and MoE	

#### 5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder is defined as an individual/institution (agency)/organization that can impact upon or get impacted by the STEEM project.

The WB ESS 10 recognizes two broad categories of stakeholders:

- <u>Project Affected Parties</u> those who are directly influenced (actually or potentially) by the Project
  and/or have been identified as most susceptible to potential risks and impacts associated with the
  Project, thus necessitating close engagement. These may include the potential beneficiaries of the
  Project and other parties who are subject to direct impacts from the Project.
- Other interested parties refer to: individuals, groups of interest, or organizations with an interest
  in the project, which may be because of the project location, its characteristics, its impacts, or
  matters related to public interest. For example, these parties may include regulators, government
  officials, the private sector, the scientific and educational institutions, NGOs or other civil society
  organizations, religious and cultural groups.

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project.

• <u>Disadvantaged / vulnerable individuals or groups</u> - persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

#### 5.1. Stakeholders' identification through Project's Components

#### 5.1.1. Project Affected Parties

The expected beneficiaries of the Project include:

(c) Students, teachers and support staff in selected public education buildings. International experience from similar projects show that energy efficiency improvements have positive impacts on living and working conditions in retrofitted buildings by improving indoor comfort levels, lighting and indoor air quality. The project will support the Government initiative of "Model Schools" which aims to increase resources of schools across the country and education outcomes by merging small schools in a larger central school. Given the scope of the project, the estimated number of clients and staff benefitting from energy efficiency improvements is about 36,000 people, including around 19,000 female beneficiaries.

- (d) Public authorities (public facility administrators and municipalities), and state government). Energy efficiency improvements are expected to result in energy cost savings for public schools owned by municipalities which will be able to use energy savings to cover needed educational-related expenditures. Additionally, public authorities will benefit from capacity building activities supported under this project.
- (e) Private sector energy service suppliers (construction and design companies, energy auditors, Energy Service Companies, equipment suppliers, etc.). Various private sector market actors are expected to benefit from the project by building demand for their energy efficiency goods and services, and by enhancing their capacity to prepare, appraise, implement, finance and/or monitor energy efficiency projects through targeted training and technical assistance activities. Specific beneficiaries may include: energy auditors, design and construction companies, equipment suppliers, commercial banks and Energy Service Companies (ESCOs).

Table 4: Directly or Indirectly Project-Affected Parties and Their Level of Interest and influence

Stakeholder	Interest in Project or How Potentially Affected by Project:	Interest	Influence
Group/Persons:			
Management of the administrative/public buildings and education facilities	<ul> <li>Beneficiaries of the planned investments under subcomponents 1.1 and 1.2.</li> <li>Beneficiaries of reduced energy costs following the implementation of investments.</li> <li>Can be involved in the mitigation of the environmental, social, health and safety risks and impacts, including operation of the GRM at local level.</li> <li>Monitoring of implementation of the site-specific measures during the construction.</li> <li>Collaboration with the contractors and consultants selected under the Project for proper risks and impacts mitigation.</li> </ul>	High	Medium
Direct beneficiaries of investments: Staff of public/administrative buildings, teachers and pupils/students	<ul> <li>Direct beneficiaries of the investments under subcomponents 1.1. and 1.2. They will benefit of improvement workers and study condition, improvement of the comfort level based on the improved heat and hot water supply system, lighting and indoor air quality.</li> <li>Potential affected by noise, dust and temporary access restriction during the works.</li> </ul>	High	Medium
The teacher's councils, includes all management staff, teachers and practical teaching staff.	<ul> <li>Direct beneficiaries of the investments under subcomponent 1.2.</li> <li>Can be directed affected during the construction/rehabilitation works.</li> <li>A partner role in the subproject preparation and implementation. The more specific aspects can be discussed under the council, such us the study organization program during the works, the adaptive Contractors' works program to the study process etc.</li> </ul>	High	High
Pupils Councils	<ul> <li>A group of pupils, representing the interests and opinion of all pupils in the school.</li> <li>A means of collaboration between pupils, teachers, administration, parents and authorities.</li> </ul>	High	Medium

Stakeholder Group/Persons:	Interest in Project or How Potentially Affected by Project:	Interest	Influence
	<ul> <li>Direct beneficiaries of the investments.</li> <li>Can be directed affected during the construction/rehabilitation works.</li> <li>Information providers to all pupils and feedback providers to the Project implementation entities or schools' management.</li> </ul>		
Parents	<ul> <li>Represents the pupils' interest.</li> <li>Interested of ensuring good study conditions for their children, including health and safety, their comfort during the works.</li> <li>Interested in the ensuring of the improvement study conditions after the investments.</li> </ul>	High	Medium
State public authorities: Ministry of Education and Research (MoER), and local public authorities (LPAs) or Central public authorities (CPAs).	<ul> <li>Energy cost savings for public facilities, local and/or entity governments.</li> <li>Improvement of the worker/study conditions for the public building beneficiaries.</li> </ul>	High	High
Contractors, Consultants and Energy Service Companies (ESCOs).	<ul> <li>Involved in the investment implementation.</li> <li>Collaboration in the risks and impacts identification and mitigation.</li> <li>Provision of the services, goods and works for the successful implementation of the component 1.</li> </ul>	High	High
"Termoelectrica" SA. (TE)	<ul> <li>TE operate the district heating system in Chisinau.</li> <li>All new HIS and networks to be financed under the Project will be operated by TE.</li> <li>Collaboration with the MEPIU team, contractors and consultant during the design, construction and operation stage of component 2.</li> <li>Collaboration with the managers of buildings, representatives of residents.</li> <li>Can be involved in the continuous consultation process and GRM operation using the existing communication/feedback channels for information and interaction with their consumers (Call-center, viber, social media etc.).</li> </ul>	High	High
Contractors and Consultants	<ul> <li>Involved in the investment implementation.</li> <li>Collaboration in the risks and impacts identification and mitigation.</li> <li>Provision of the services, goods and works for the successful implementation of the component 2.</li> </ul>	High	High
The community – residents who live near the buildings that will benefit from the investments.	<ul> <li>Potentially affected by the noise, dust and access restriction during the works.</li> <li>Interest for similar investment in their buildings.</li> </ul>	Low to Medium	Low to Medium

Stakeholder Group/Persons:	Interest in Project or How Potentially Affected by Project:	Interest	Influence
Government of the Republic of Moldova, specifically MoE NCSE/ EEA, TE and MEPIU	<ul> <li>Beneficiary of the planned investments under subcomponent 1.3 of the Project.</li> <li>NCSE/EEA, TE in consultation with MoE and logistical support of MEPIU prepare the required legal documents on establishment of energy efficiency public revolving fund.</li> <li>NCSE/EEA, TE in consultation with MoE and logistical support of MEPIU prepare the required legal documents to amend regulations to allow public institutions to deposit monetized energy saving in a revolving fund approved.</li> </ul>	High	High
Public Institutions	<ul> <li>Deposit monetized energy saving in a revolving fund approved.</li> </ul>	Medium	Medium
Project workers <sup>4</sup>	<ul> <li>Beneficiaries of the capacity buildings activities.</li> <li>Involvement in the implementation of all Project's components and activities.</li> <li>Occupational health and safety risks impacts.</li> <li>Labor risks, non-compliance with legal provisions in the field of work.</li> <li>Labor Management Procedures under the Project consistent with WB's ESS2 will be developed. LMPs will include clear worker Grievance Mechanisms, including codes of conduct to prevent and manage incidents of SEA/SH. LMPs will include measures to prevent occurrences of harmful child or forced labor and that grievance mechanisms are available for direct and contracted workers. Activities that involve significant risk of child or forced labor will not be financed under the Project. Measures to mitigate the impact on worker health and safety will be included in the LMPs.</li> </ul>	Medium	Medium

For the purpose of the Project the workers from communities (institutions/enterprises and people from communities of Project area or from the country) can be involved in the implementation of Project activities.

<sup>4</sup> 

*Direct workers:* People employed or engaged directly by the Project implementation entities to work specifically in relation to the project;

Contracted workers: People employed or engaged through third parties to perform work related to core functions of the project, regardless of location;

#### 5.1.2. Other Interested Parties

The following table presents the list of other interested parties that have been identified to date. The list may be supplemented with additional organizations as project preparation and implementation evolves:

Table 5: Other Interested Parties and Their Interest/Influence

Authority	Role	Interest	Influence
National			
Sterring Committee (tentatively created from MoE, MoF, MoER, MoH, MIDR).	<ul> <li>Management of the Project.</li> <li>Ensuring the successful implementation of all Project components through the good collaboration between the governmental institutions to be beneficiaries and managers of the proposed investments under STEEM.</li> </ul>	High	High
Implementation entities:  - MoE  - MEPIU  - NCSE / EEA  - TE	<ul> <li>MoE will play the leading role in implementing the proposed project, while relying on its departments, sub-divisions, and subordinated agencies to provide technical support for implementation.</li> <li>MEPIU, directly responsible to MoE, will carry out a range of fiduciary, coordination and supporting functions to ensure efficient project implementation in relation to the MoE's obligations on social and environmental safeguards, procurement, financial management and other country-specific requirements such as monitoring and evaluation.</li> <li>NCSE will be involved in the selection process of the public buildings that will benefits by investment under component 1.1.</li> <li>TE will be involved in the selection process of the public buildings that will benefit by investment under component 1.2.</li> <li>MoE, NCSE and TE will be involved in the implementation of the component 1.3.</li> <li>The implementation entities will ensure the Project implementation, including monitoring of the implementation of the ESMF, SEP, LPM and GRM.</li> </ul>	High	High
Ministry of Finance (the Borrower of the Project)	<ul><li>Approval of payments and financing.</li><li>Monitoring of management of flow of funds.</li></ul>	High	High
Public Property Agency (PPA) - the main shareholder of "Termoelectrica" S.A.	<ul> <li>Through the Company's Administration Board and General Assembly authorizes the high value transactions,</li> <li>Establishes the priority directions of the company's activity including regarding the</li> </ul>	High	Medium to High

Authority	Role	Interest	Influence
	<ul> <li>implementation of major investment projects;</li> <li>Decides on the distribution of the annual net profit, thus influencing the financing of investment projects and accumulation of capital reserves for credit / depts repayments</li> <li>Through company's administrative bodies approves corporate operational regulations / procedure including on fields of environmental and labor protection, public transparency and information disclosure etc.</li> </ul>		
National Agency for Energy Regulations (ANRE)	<ul> <li>Supervises the activity of the energy sectors and the way the energy sector enterprises comply with the normative acts</li> <li>Promotes an appropriate tariff policy that is consistent with the market economy principles so as to ensure the protection of the end-user rights and the profitability of energy companies;</li> <li>Approves the tariffs calculated according to ANRE approved methodologies, thus influencing the financial and economic stability of the company, the ability to cope with creditors' payments.</li> </ul>	Medium	Medium
Public institutions management - TBD	<ul> <li>Collaboration with implementation entities during the implementation of the component 1.</li> <li>Monitoring and involvement in the implementation of the Project activities, including information of direct beneficiaries of the investments and technical assistance activities.</li> </ul>	High	High
Ministry of Environment/ The Environment Agency/ The Inspectorate for Environment Protection	- Environmental management, prevention of pollution, issue permits, environment control and monitoring, of biodiversity, soil, water and other natural resources.	Medium	High
Ministry of Labor and Social Protection /State Labor Inspectorate	- Local employment and labor conditions, vulnerable people.	Medium	Medium
Local level			
Local Public Authorities  Congress of Local Authorities from Moldova (ro. CALM)  TBD according to the further beneficiaries to be included in	<ul> <li>Elaborates and implements policies in the field of urbanism, planning of municipal territory.</li> <li>Interested in organizing and developing qualitative, safe and environmentally friendly public services,</li> </ul>	Medium	Medium

Authority	Role	Interest	Influence
the component 1.  Mass Media and Non-Governme	<ul> <li>Interested in public services at affordable prices for the municipal population, especially for vulnerable groups,</li> <li>Interested in reducing social tension due to non-qualitative public services.</li> </ul>		
	S		
Non-governmental organization (NGOs) and mass-media	- The NGOs (energy and education fields)  5 and mass- media can provide support in the information and communication with the potential beneficiaries to be identified in order to participate in the Project and also can provide support to information on Project's available information, including the ESF documentation.	Medium	Medium
International			
World Bank	<ul> <li>The Donor of the Project.</li> <li>The implementation entities will report to World Bank on implementation progress of the Project.</li> <li>Monitoring of the Project implementation.</li> </ul>	High	High
United Nations Development Programme (UNDP)	<ul> <li>Selection and prioritization of the buildings under component 1 will be based on an existing database developed under the support of UNDP.</li> </ul>	Medium	Low to Medium
Contractors			
Consultants and Contractors	<ul> <li>The Consultants and Contractors can be interested in the Project activities and timely and successful implementation if selected.</li> </ul>	High	Medium

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<sup>&</sup>lt;sup>5</sup> Alliance for energy efficiency and renewable; National Energy Council; Green City Lab Moldova. https://mecc.gov.md/en/content/lista-organizatiilor-neguvernamentale-pe-domenii-de-activitate

#### 5.1.3. Disadvantaged/Vulnerable Individuals or Groups

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 implementation entities will closely monitor the consultation process to ensure access and awareness of the Project benefits and to provide information on environmental and social impact mitigation measures to all affected and interested parties.

Considering the planned investment under the STEEM project, the groups of people can be considered disadvantaged or vulnerable during the implementation of the components 1 and 2.

The table below summarizes the categories of vulnerable and disadvantaged groups and their vulnerability, as well as their level of interest and influence of the project.

During the social screening of the planned investments, the differential impacts on the vulnerable groups will be identified and assessed. The other vulnerable groups within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate, upon confirmation of subprojects locations and beneficiaries.

Table 6:Analysis of disadvantaged and vulnerable groups and their level of interest and influence of the Project

Di	isadvantaged and vulnerable	Description of vulnerability / disadvantage	Interest	Influence		
	roups					
Component 1: Energy efficiency renovation in public buildings						
	Biological and social orphans. Children/Parents/buildings users with severe physical and sensory disabilities. Roma communities. Ukrainian refugee children and their parents Children from families with low income. Teachers with disabilities. Illiterate parents /Parents and children from ethnic minorities. Low-income families/extreme poor and especially female headed households.	The vulnerabilities of these groups can be caused by the incapacity or the limited possibilities to have access to the information on Project's activities. Lack of interest in Project related information and which can lead to ignoring important information for health and safety.	Low	Low		
C	omponents 1, 2 and 3					
-	Women from energy sector and women who want to adopt STEM careers.	The representation of women in the energy sector remains disproportionately low. This disparity can hinder the progress of women currently in the field, as well as those aspiring to embark on STEM careers. Such imbalances may stem from the misguided belief that STEM fields are predominantly male domains. This project is dedicated to fostering and encouraging the participation of women in the energy industry through a series of targeted activities	Low	Low		

#### 5.2. Summary of Project Stakeholder Needs

The following specific needs were identified based on the MEPIU's prior experience during the ongoing projects implementation (MHEP and DHEIP-2):

Table 7: Project Stakeholder Needs (Summary)

Stakeholder Group	<b>Consultation Methods</b>	Specific Needs (accessibility, large print, childcare, daytime meetings)
Governmental institutions	<ul> <li>Official letters</li> <li>Emails</li> <li>Nontechnical summary documents</li> <li>Progress reports</li> <li>In -person meetings</li> </ul>	<ul> <li>Official correspondence and nontechnical documents or progress reports to be shared in Romanian (official language)</li> <li>Daytime meetings</li> </ul>
Local Public Authorities	<ul> <li>Official letters</li> <li>Emails</li> <li>Nontechnical summary documents</li> <li>Progress reports</li> <li>In person meetings</li> </ul>	<ul> <li>Official correspondence and nontechnical documents or progress reports to be shared in Romanian (official language)</li> <li>Daytime meetings</li> </ul>
Staff of the public buildings	<ul> <li>Official letters</li> <li>Emails</li> <li>In-person meetings</li> <li>Nontechnical summary documents</li> <li>Flyers</li> <li>Posters</li> </ul>	<ul> <li>Communication to go through Ministries and institution management.</li> <li>Materials to be shared in Romanian</li> <li>Proximity to the public buildings</li> <li>Time bound meetings</li> </ul>
Pupils and parents	<ul> <li>In-person meetings</li> <li>Banners</li> <li>Posters</li> <li>Flyers</li> <li>Social Media</li> <li>Viber, WhatsApp</li> </ul>	<ul> <li>All materials to be shared in Romanian and Russian</li> <li>Printed material to be in large font</li> <li>Proximity to the buildings</li> <li>Time bound meetings</li> </ul>
Managers of the public buildings	<ul> <li>Official letters</li> <li>Emails</li> <li>In-person meetings (e.g. consultations, workshops etc.)</li> <li>Nontechnical summary documents</li> <li>Flyers</li> </ul>	<ul> <li>Communication to go through Ministries</li> <li>Materials to be shared in Romanian and Russian</li> <li>Proximity to the buildings</li> <li>Time bound meetings</li> </ul>
Public buildings users	<ul><li>In-person meetings</li><li>Banners</li><li>Posters</li><li>Flyers</li><li>Social Media</li></ul>	<ul> <li>All materials to be shared in Romanian and Russian</li> <li>Printed material to be in large font</li> <li>Proximity to the buildings</li> <li>Time bound meetings</li> </ul>

Stakeholder Group	Consultation Methods	Specific Needs (accessibility, large print, childcare, daytime meetings)
Community close to the selected public buildings	<ul> <li>Posters, announcement on information board, social media</li> <li>Flyers</li> </ul>	<ul> <li>All materials to be shared in Romanian or Russian</li> <li>Printed material to be in large font</li> </ul>
Contractors, Consultants and ESCOs	<ul> <li>Official Letters</li> <li>Emails</li> <li>Web site</li> <li>Social Media</li> <li>In- person meetings</li> </ul>	All materials to be shared in Romanian and English
Vulnerable Groups	<ul> <li>In-person meetings</li> <li>Banners</li> <li>Posters</li> <li>Flyers</li> <li>Social Media</li> <li>Other TBD during the meetings or discussions.</li> </ul>	<ul> <li>All materials to be shared in Romanian and Russian</li> <li>Printed material to be in large font.</li> <li>Proximity to the buildings</li> <li>Time bound meetings</li> <li>Other TBD.</li> </ul>

#### 6. STAKEHOLDER ENGAGEMENT PROGRAM

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

#### **6.1.** Engagement Methods to be Used

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

Public consultation/group meetings (in person or online) - the disclosure of information should support consultation. Consultation is a two-way process of dialogue between the Project implementation entities and Project stakeholders.

At the stage of SEP preparation, the potential beneficiaries of the activities and investments included in the Component 1 of the Project are not yet clearly identified. Consequently, the potentially identified beneficiaries will be informed and consulted on the Project's activities and design. Once the beneficiaries will be identified the consultation process will be continued in order to provide information regarding the project to groups of beneficiaries throughout the duration of the Project's implementation (when necessary). Also, additional consultations will be held at the request of the beneficiaries or when the implementation period. The feedback provided by the stakeholders during the consultation shall properly documented in the minutes of meetings or reports on consultation conducted, which will include the question, suggestion and proposals addressed by participants and the answers offered by organizer/moderators. In case of some proposals or suggestions shall be mentioned if they were accepted or the reason for their non-acceptance. The results of engagement activities shall be provided to the participants in dependence of type of event. The results of consultation can be submitted directly to the

participants if the contact data is provided or can be placed on the web site, about which the participants will be informed during the event.

- **Field visits** to identify the beneficiaries of the Project and to consult the stakeholders and monitor project implementation directly on the site (when will be necessary for regular monitoring of the Project's activities).
- Workshops (in person or online) The workshops with experts will be held to consult on the implementation status and progress of the project and the revision and development of new policies and normative documents, e.g. the planned activities under component 1. Also, the workshops can be organized with the public institution managers on GRM operation and monitoring of the environmental and social aspects during the construction works. Other topics relevant for these workshops will be identified during project implementation.
- **Trainings and capacity buildings activities** these methods and related tools will be used specifically in the context of the planned activities under component 2 of the Project by specialized and selected/contracted consulting companies and trainings institutions.
- Leaflets/posters and summary information notes leaflets and summary information notes to be submitted to the Project's affected and interested parties. The leaflets and summary information notes can be included the information of the specifically aspects of the Project, such as the benefits of proposed investments and GRM. The information materials ca be distributed in the meetings/ public consultations, also can be placed on the information boards at selected public buildings, at LPA's offices etc.
- **Information boards** establish Information Boards in each Project area. On these boards will be placed the information related to the Project, relevant for every phase of Project implementation.
- **Individual meetings** –individual meetings will be held with the affected parties at their request, also with people from vulnerable groups (if such cases are identified) in order to find and implement solutions to some specific situations or issues.
- Implementation entities websites and social media channels the web sites and social media channels of the implementing entities will be the main information tools during Project implementation. Short descriptions will be developed in an accessible and proper language for websites on benefits of planned investments, mitigation measures during the pre-construction and construction phases etc.
- Letters the letters will be an instrument used 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.
- **Grievance Redress Mechanism (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 are registered (including grievance delivered by letter mail or in writing) and maintained, followed up and resolved through a database.

#### **6.2.** Proposed Strategy for Information Disclosure

#### Stakeholder Engagement Plan Sustainable Transition Through Energy Efficiency in Moldova

The implementation entities will disclose Project information to allow stakeholders to understand the risks and impacts of the Project, and potential opportunities. Stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. Making available Project-related information as early as possible is important.

Prior to the Project appraisal, the following documents will be prepared and disclosed:

- 1. Environmental and Social Commitment Plan (ESCP);
- 2. ESMF, including LMP;
- 3. This SEP, including GRM.

The contractor(s)' Environmental and Social Management Plan (C-ESMP) and contractor(s)' Labor Management Procedure (C-LMP) will be disclosed prior commencement of civil works.

Reports and the documents mentioned above will be available to the public for a period of 14 calendar days to provide comments and suggestions.

The current MEPIU website (http://www.mepiu.md) shall be used to disclose project-related documents, including Project progress reports, reports on SEP and GRM implementation both Romanian and English. The contact details of the E&S team will be provided for feedback provisions or if further questions arise.

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.

Table 8: Information Disclosure Strategy

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
Project preparation					
All	Proposed Project Design; PAD (check the WB requirements for PAD disclosure)	WB, MEPIU, TE and NCSE /EEA web sites; distribution via email.	Prior to the Project appraisal	All	MoE, MEPIU and WB team
All	Draft ESCP and ESMF documentation that is required for disclosure by the WB, including this SEP and LMP.	WB, MEPIU, TE and NCSE / EEA websites; distribution via email.  Summary description note of the ESMF and SEP can be submitted via email.	Prior to the Project appraisal	All	MoE, MEPIU and WB team
All	Final ESF documentation, including all comments and suggestions.	WB, MEPIU, TE and NCSE / EEA websites; distribution via email.	Prior to the Project effectiveness	All	MEPIU
All	Project operational Manual	Via email.	Prior to the Project effectiveness	MoE, MoF, MoER, MoH, NCSE /EEA and TE	MoE and MEPIU
All	Regulation and procedures on GRM operation	Via email	Prior to start of the Project implementation	MEPIU, TE and NCSE / EEA	MEPIU
		Project implementation			
Component 1. Sub-component 1.1.	Selection process of the beneficiary buildings, including the used criteria and the further stages.	MoE, MEPIU and NCSE, TE websites and social media. Meetings with the managers and LPA/CPA.	Prior to start the selection process and at the end of the selection process.	Manager of the public buildings.  LPA and CPA.	MEPIU

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
Component 1	Site-specific screening checklists/ESMPs C- ESMP C –LMP GRM channels	Post on the MEPIU and public institutions websites.  Summary of these documents will be placed on informational boards placed near sub-Project area and at LPAs.	Prior some civil works begins	Beneficiaries of the investments and community member near location of the proposed sub-project area.	MEPIU and Contractors
Component 1 – subcomponent 1.3.	Drafts of the required legal documents on establishment of energy efficiency public revolving fund and of the required legal documents to amend regulations to allow public institutions to deposit monetized energy saving in a revolving fund approved.	MoE, MEPIU and NCSE websites.  Web site https://particip.gov.md/ro	After draft development.	All	MoE/MEPIU/ NCSE
Component 2	Trainings Results	MoE, MEPIU and NCSE websites and social media.	After capacity buildings activities conduction	MoE, MEPIU, NCSE	MEPIU
Component 3	TBD	TBD	TBD	TBD	MoE and MEPIU
All	Project's progress reports, including implementation of the safeguards requirements and provisions agreed at the preparation stage.	MEPIU website. Email to WB and interested governmental institutions.	Quarterly	All	MEPIU
All	SEP and GRM implementation reports	MEPIU website and social media	Semiannually	All	MEPIU
All	Project's Completion Report, including implementation of the safeguard requirements and plans.	MEPIU website Email to WB and interested governmental institutions.	TBD	All	MEPIU

#### 6.3. Timeline for Provision of Comments and Feedback

MEPIU will provide appropriate background and relevant technical or non-technical information to stakeholders' whose feedback is sought on with sufficient advance notice (5-10 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback. The MEPIU team will gather (written and oral comments), review and summarize them and commit to report back to stakeholders on how those comments were incorporated, and if not, provide the rationale for reasons for why there were not within 10 to 30 working days from the stakeholder engagement event either.

Comments, suggestions and feedback to Project disclosed documents can be provided as follows:

- 1) By Email to the address: <a href="mailto:mepiu@mepiu.md">mepiu@mepiu.md</a>
- 2) By landline correspondence: 1, block A1, Alecu Russo st., of. 163, MD-2068, Chisinau, Republic of Moldova
- 3) By telephone: +373-22-49-67-90

#### **6.4.** Future Phases of Project

Information materials will be developed to keep the stakeholders informed on Project activities and its environmental and social performance, including a summary of how and when the results of stakeholder engagement activities and grievance handling are reported back to affected communities and/or broader stakeholders. Information which will be disseminated to stakeholders during Project implementation includes the following:

- Non-technical environmental and social assessment reports;
- Ad hoc reports / newsletters on the implementation entities web sites and social media channels;
- Information on Project implementation and mitigation measures in each phase of Project implementation will be places on the information boards in all affected public buildings and localities:
- Project's annual reports on SEP implementation process;
- Leaflets/poster and information notes that will be placed in the mailboxes inside the public buildings and will be submitted to pupils and parents through the already used by schools communication channels, such us Viber, WhatsApp, Telegram etc.;
- GRM implementation, including resolution for anonymous grievances using the website, information boards etc.

Considering all information provided and described in this SEP above, the stakeholder engagement program is proposed for engaging relevant stakeholders throughout the Project cycle.

It is important to keep in mind that the situation is dynamic and that some stakeholders and their interests might change over time.

Thus, to keep the Project stakeholders informed about Project progress and implementation challenges throughout the Project cycle, the proposed stakeholder engagement program below covers all aspects of Project implementation, including compliance with both the national and World Bank environmental and social requirements.

**6.5.** Proposed Stakeholders Engagement Activities

Table 9: Overview of planned communication and engagement activities of the project affected parties

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders			
	Component 1							
PREPAPARTION	State and local public authorities: and managers of the administrative/ public buildings and education facilities.	Individual and group meetings  MEPIU website and social media	TBD	Objectives and planned activities under the Project. General planned Project implementation process. Selection process, including the used criteria in the selection of the beneficiary institutions. GRM	MoE, MEPIU and NCSE / EEA			
PA			Compo	nent 2				
PRE	MoE, MEPIU, NCSE / EEA and TE	Survey Groups or individual meetings	TBD	Trainings needs assessment	MEPIU / Contracted consultant			
	Component 1							
IMPLEMENTATION	Management of public / administrative buildings and education facilities  State public authorities: MoER, MoH, MIDR and local public authorities.  Letters Consultation meetings Information Board Websites and social media  Letters Leaflets / Posters	Consultation meetings	Prior to start of the construction works	The site-specific identified risks and impacts and proposed mitigation measures.  C-ESMP, including Health and Safety (HS) risks and their mitigations.  C-LMP.  GRM.	MEPIU / Contractors			
			By start of the construction works	Summary information on the HS risks and the protection measures during the construction works, which have to be respected by all in the site.  GRM for affected parties and workers.  The planned investments and benefits.	MEPIU / Contractors			
		To be distributed in the meetings – during Project implementation	Planned investment and benefits, GRM operation and other proposed mitigation measures.	MEPIU				
		Website and social media	During all Project implementation	Planned activities, announcements, results and benefits.	MEPIU			
	Teachers and Pupils Councils	Consultation meetings	During the design stage	Potential risks and impacts identification.  Options for mitigation of the ES risks and impacts, including access options, the existing study	MEPIU Page   39			

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders
				programmer and available options for works schedule.  Necessary information to be provided and more acceptable channels and methods for information and engagement.	
			Prior to start of the construction works	The site-specific identified risks and impacts and proposed mitigation measures.  C-ESMP, including Health and Safety (HS) risks and their mitigations.  C-LMP.  GRM.	MEPIU / Contractors
		Information notes and leaflets	At every main subproject stage	Health and safety. Works schedule. GRM.	MEPIU
		Leaflets	At subproject completion	Benefits of the investments.  Operation requirements.	MEPIU
	Direct beneficiaries of investments: Staff of public buildings, including teachers and pupils.	Consultation meetings Information Board Websites and social media	Prior to start of the construction works	The site-specific identified risks and impacts and proposed mitigation measures.  C-ESMP, including Health and Safety (HS) risks and their mitigations.  C-LMP.  GRM.	MEPIU / Contractors
		Information Board Websites and social media	By start of the construction works	Summary information on the HS risks and the protection measures during the construction works, which have to be respected by all in the site.  GRM for affected parties.  The planned investments and benefits.	MEPIU / Contractors
		Leaflets /Posters	To be distributed in the meetings – during Project implementation	Planned investment and benefits, GRM operation and other proposed mitigation measures.	MEPIU
		Website and social media	During all Project implementation	Planned activities, announcements, results and benefits.	MEPIU

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders
	Parents	Consultation meetings Information Board Websites and social media	Prior to start of the construction works	The site-specific identified risks and impacts and proposed mitigation measures.  C-ESMP, including Health and Safety (HS) risks and their mitigations.  C-LMP.  GRM.  Works Schedule and the arrangements for the study process if any.	MEPIU / Contractors
		Leaflets and social media	During subproject implementation, available at every school in the dedicated places for information.	Planned investment and benefits, GRM operation and other proposed mitigation measures.	
		Existing channels for communication with parents (e.g. Viber, WhatsApp ect.) through schools managers or teachers.	During subproject implementation	Works schedule. Health and safety measures. Access restriction. Some interruptions or changes to the program if any. GRM under the Project (all contact data related to subproject implementation)	MEPIU with support of the schools' managers or councils
	Contractors, Consultants and Energy Service Companies (ESCOs).	Letters Meetings Reports	During the biddings process and contracts implementation	TBD. Depending on the activities in which they are involved.	MEPIU
	"Termoelectrica" SA (TE)	Meetings Letters	If necessary	Implementation of the Component 2: design and contracts implementation.	MEPIU
	The community – residents who live near the buildings that will benefit from the	Information board at the construction site	Starting with the construction works	Planned works, their duration and expected benefits. The proposed mitigation measures during the construction works. GRM.	MEPIU and Contractors
	investments.	Individual and group meetings	At request	TBD	

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders		
	Contractors and	Meetings	If necessary or	Bidding / procurement procedures, contracts	MEPIU		
	Consultants	Letters	during the specific contracts' implementation	implementation, including the safeguards requirements implementation.			
	Government of Republic	Meetings	When necessary	Development of the required documents, decisions	MoE		
	of Moldova, specifically	Letters		and regulation as per national requirements.			
	MoE						
	NCSE / EEA, TE and MEPIU						
	Component 2						
	MoE, MEPIU, NCSE	Meetings	When necessary	Project management, operational cost, training	MoE / MEPIU		
	/EEA and TE	Letter		planning and results.			
		Reports					
	Component 3						
	TBD	TBD	TBD	TBD	TBD		

Table 10: Overview of planned communication and engagement activities for other interested parties

Ctalvah aldan anaun	En an annuant mathada	Frequency/	Topics		Responsible
Stakeholder group	<b>Engagement methods</b>	Locations	Preparation & pre - construction	Implementation	stakeholders
Implementation entities: MoE; MoER, MoH, MEPIU, NCSE / EEA and TE	Meetings Reports Letters and E-mail	When necessary	Design of stakeholders' engagement process. Selection of Consultant and Contractors. Project design. Set-up GRM. Other information.	Project monitoring. Implementation of ESMPs, SEP (including GRM), LMPs, and other safeguards requirements. Other information as requested.	MoE and MEPIU
Other national public Authorities and organizations	Letters Meetings	Before construction works begins	Information necessary for obtaining approvals, permits and/or for coordination of the documents, according to national laws. Other information as is requested.	TBD	MoE and MEPIU
LPAs. To be determined other LPAs according to the beneficiaries to be included in the Project.	E-mails and letters  Meetings  Public consultations  MEPIU web site and social media	Following effectiveness of the Project When necessary	Planned activities. GRM operation. Other aspects identified during the Project implementation.	Subprojects monitoring. Implementation of ESF, ESMPs, SEP (including GRM), LMPs and other safeguards requirements. Other information as requested.	MEPIU
Mass media, NGO	Letters Press-releases Meetings Public consultations MEPIU website and social media	During all Project implementation	Objective and benefits of the Project. Project implementation progress. Other information if requested	Start and progress of the construction works. Results and benefits. Information on request.	MoE and MEPIU
Financial institution (WB)	Letters E-mails Meetings	When necessary  During Supervision mission	Bidding Documents. Pre-construction Planning. Safeguards documents development.	Project implementation progress. Implementation of ESF, ESMPs, SEP (including GRM), LMP and	MEPIU
	Reports	Quarterly	GRM set-up. Other information.	resettlement activities. Other information as requested.	

#### Stakeholder Engagement Plan Sustainable Transition Through Energy Efficiency in Moldova

Stalzahaldan anaun	Engagement methods	Frequency/	Topics		Responsible
Stakeholder group	Engagement methods	Locations	Preparation & pre - construction	Implementation	stakeholders
Consultants and Contractors	Letters, E-mails, Meetings	When necessary	Procurement process. ESMPs, LPMs, Code of Conduct elaboration and coordination. Development of design. Other information as requested.	Contracts implementation. Implementation of ESMPs, SEP, LMP and GRM. Other information as requested	MEPIU

#### 6.6. Proposed strategy for inclusion and communication with vulnerable groups

The determined groups with vulnerable persons will be completed and finalized based on social screening and assessment to be provided at site level after the selection of the public buildings will be completed.

Once the potentially vulnerable affected parties are identified, MEPIU will ensure that all identified vulnerable groups will benefits and will be participants of all planned information and consultation activities. Additionally, the managers of the public buildings will be involved in the continuously information and communication process of all Project's affected parties and communities, including the vulnerable groups. The managers will place all Project related information at public and visible places and will provide at request all available information. If will be necessary in the specifically cases, the managers will request additional data or information to be provided to all affected parties or to a vulnerable group or will request MEPIU support in the communication with the vulnerable groups.

The table below provides details of the approach to ensure that vulnerable groups are properly informed, consulted and engaged during the Project implementation.

Table 11 : Strategy for inclusion and communication with vulnerable groups				
Target groups	Strategy			
<ul> <li>Biological and social orphans.</li> <li>Children/Parents with severe physical and sensory disabilities.</li> <li>Roma communities.</li> <li>Ukrainian refugee children and their parents</li> <li>Children from families with low income.</li> <li>Teachers with disabilities.</li> <li>Illiterate parents /Parents and children from ethnic minorities.</li> <li>Low-income families/extreme poor and especially female headed households.</li> </ul>	<ul> <li>organize consultations.</li> <li>Separate consultation sessions (e.g., meetings and focus group discussion).</li> <li>MEPIU will use various communication measures including all relevant NGOs to reach out different vulnerable groups.</li> <li>School open days will be organized for vulnerable groups.</li> <li>Continuous information provisions using the various channels and methods.</li> <li>Proactive involvement in the Project implementation of the institutions managers and LPAs in order to ensure the</li> </ul>			
Women from energy sector and women who want to adopt STEM careers.	<ul> <li>An internship program for female engineers in participating energy sector institutions to address the gender gap in labor force participation within Moldova's energy sector. Promoting employment in the science, technology, engineering, and mathematics (STEM) fields is particularly relevant for enhancing women's employment and income-earning prospects. While STEM occupations offer desirable benefits, such as higher financial remuneration, significant barriers hinder girls and women from entering these fields.</li> <li>Also, MEPIU will manage a training program to stir interest of young women towards STEM careers. At the outset, the MEPIU will organize and deliver a training program for technical consultants that will explicitly target female candidates. The MEPIU will conduct outreach to identify and encourage female professionals to attend the training and will encourage interested</li> </ul>			

Target groups	Strategy
	local contractors to attend the training and hire from the pool of
	trained professionals.

# 7. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

#### 7.1. Implementation Arrangements

The project will be implemented by the Ministry of Energy through its Project Implementation Unit (MEPIU), which was created in 2000 as autonomous legal entity responsible for the day-to-day management of IFI-funded projects. Among them, there are two World Bank-funded projects under implementation: Moldova Power System Development Project (PSDP; P160829) and the Second District Heating Efficiency Improvement Project (DHEIP-2; P172668). Despite its large experience, including on environmental and social (E&S) risk management, the MEPIU will require staff reinforcements to implement the proposed project. A training approach and budget regarding the safeguards' implementation is included in the ESMF developed for this Project both for the MEPIU's staff and Contractors'/Consultants' staff to be involved in the Project implementation, specifically in the environmental and social requirements implementation.

#### 7.2. Roles and Responsibilities in SEP Implementation

As is mentioned above, MEPIU will be responsible for all fiduciary aspects of STEEM project implementation, including compliance with ESF and safeguards requirements of the World Bank. This SEP implementation will be the responsibility of a MEPIU's team.

MEPIU will use the tools provided in the stakeholders' engagement program above. The roles and responsibilities of SEP implementation team and other stakeholders are summarized in the Table below.

Table 12: Roles and Responsibilities in SEP Implementation

Actor/Stakeholder	Responsibilities
MEPIU's team, specifically Environmental and Social specialists	· · · · · · · · · · · · · · · · · · ·

Actor/Stakeholder	Responsibilities
	<ul> <li>Monitors and to measures the Project's indicators related to the implementation of this SEP and GRM as will be provided in the Project's Financial Agreement to be signed;</li> <li>Maintains the stakeholder engagement register (dates, list of participants, makes a summary of feedback provided and helps draft the summary response on how the stakeholder feedback was incorporated in implementation and if not, provide the rationale);</li> <li>GRM operation, creating and keeping the GRM Register for the Project;</li> <li>Supervise/monitor and coordinate activities with the Project management to ensure that staff and all sub-contractors comply with the SEP;</li> <li>Manage the day-to-day working, utilization, implementation of SEP by all parties engaged on the Program;</li> <li>Review and updated the SEP ensuring compliance in terms of Environmental, Occupational Health and Safety requirements.</li> </ul>
Managers of the public / administrative buildings and education facilities	<ul> <li>Inform the staff and buildings users on Project's planned activities and on the progress during the implementation;</li> <li>Inform the staff and buildings users on environmental and social impacts mitigation measures, including HS and GRM;</li> <li>Involved in the GRM operation at local level, creating and keeping the GRM Register at subproject level.</li> <li>Weekly and monthly reporting to MEPIU related to GRM operation and SEP implementation. Collaborate with MEPIU and other Project's implementation entities in order to ensure successful and timely Project's objectives achievement.</li> </ul>
Contractors/sub-contractors/Supervision consultants	<ul> <li>Inform MEPIU of any issues related to their engagement with stakeholders;</li> <li>Redirect to the MEPIU the grievances caused by the construction activities or received on the site;</li> <li>Prepare, disclose and implement various plans (e.g. C-ESMP, C-LMP, etc.);</li> <li>Inform the beneficiaries of the investments or local communities of any environmental and HS mitigation and monitoring measures;</li> <li>Inform the workers on the available GRM for workers;</li> <li>Inform local communities on GRM at Project level;</li> <li>Creating and keeping the GRM Register at subproject level with construction.</li> <li>Announce important construction activities (such as restriction of access and available alternatives).</li> <li>Weekly and monthly reporting to MEPIU related to GRM operation and SEP implementation.</li> <li>Report immediately to the MEPIU the complaints regarding significant or serious incidents including SEA/SH.</li> </ul>
Project Affected Parties	<ul> <li>Invited to engage and ask questions about the Project in the meetings and through discussions with the implementation entities;</li> <li>Lodge their grievances using the GRM;</li> <li>Help the implementing entities to define the appropriate mitigation measures.</li> </ul>

#### 7.3. Estimated Budget

The Project will have a dedicated budget for engagement and communications activities to ensure the implementation of this SEP and outreach activities envisaged. All costs for stakeholders' engagement activities will be covered by the component 4 - Project Management. In every year will be planned an estimated budget based on previous experience for information materials development (brochures, leaflets, posters, other items), translation and printing, transport and other planned expenses related to the stakeholder engagement activities. MEPIU will review the SEP and its budget every six month and revise it accordingly to reflect changing circumstances.

The below table presents an estimated budget for the implementation of the SEP. It should be noted that Constructor s' budgets should include the costs of SEP implementation, in view of activity specific stakeholder consultations and information dissemination for educational facilities/schools' rehabilitation/construction. The budget presented here concerns the Project level implementation of the SEP through the MEPIU. The source of funding is the Project budget.

Table 13: The Project estimative costs for SEP activities (EUR)

Item	<b>Estimated Cost (EUR)</b>
Periodic stakeholder consultations	10 000
Information materials development (brochures, leaflets, posters, other items)	8 000
Awareness campaign	6 000
Training for buildings managers / focal points and Contractors:  • Stakeholder engagement methods and tools  • GRM Implementation  • Occupational and Community Health and Safety,  • Emergency Preparedness and Response for worker,  • GBV and SEA / SH Risk Mitigation	10 000
Logistic Costs	6 000
Total	40 000

#### 8. GRIEVANCE REDRESS MECHANISM

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project before Project effectiveness. Dedicated communication materials (GRM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures.

Addressing grievances raised by individuals/groups/entities affected by WB-funded Projects is an important component of managing Project risks. A GRM can serve as an effective tool for early identification, assessment and resolution of grievances and therefore for strengthening accountability to beneficiaries. The GRM serves as an important feedback mechanism that can improve Project impact and mitigate the risks. The GRM mechanism will be available to Project stakeholders and other affected parties, enabling them to submit questions, comments, suggestions and/or complaints and provide any form of feedback on all Project-funded activities.

#### 8.1. Definition of GRM

For the purposes of this SEP, a Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related grievances from Project affected parties and other interested parties at the level of the project.

The term" *Grievance*" within the implementation of this Project, is defined as any type of feedback, such as requests, proposals, dissatisfactions, complaints, issues, concerns, suggestions, queries sent by the Project's stakeholders.

#### 8.2. GRM scope and use

*Scope:* The Grievance Redress Mechanism under STEEM project will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

*GRM's users:* Project beneficiaries, project workers, identified project affected parties, as well as the broadercitizens can use the GRM related to project activities.

GRM's management: The GRM for STEEM Project will be managed by the MEPIU.

#### 8.3. Procedures - Grievance Resolution Framework

#### 8.3.1. Grievances submission

**Project Level:** The Project's stakeholders can submit any type of feedback related to all Project's activities, including complaints, to MEPIU, suing the following channels:

Moldova	Energy	<b>Projects</b>	Implementation	Unit	(MEPIU)

Chisinau,1, Alecu Russo St., office 163

Tel: (+373) 22 496790

#### **Moldova Energy Projects Implementation Unit (MEPIU)**

Fax: (+373) 22-49-67-90 Email: mepiu@mepiu.md

Verbal complaints addressed to Project staff could be recorded in writing by the receiver

**Subprojects level**: The any type of feedback related to implementation can be submitted to management of public / administrative buildings and education facilities or to persons to be appointed by the managers to be responsible for the implementation of the subproject.

The Contractors that carry out the work will receive and solve the grievances related to works only. The contractor will guide the stakeholders to submit the other type of grievances to institution management. The Contractors will inform weekly MEPIU on received and solved grievances.

The grievances related to subcomponent 1.2 implementation can be submitted also to "Termoelectrica" S.A. using the following channels:

#### "Termoelectrica" S.A. (TE)

Chisinau, 6, Tudor Vladimirescu st.

Tel: (+373) 22 43-64-59 Fax: (+373) 22 49-50-97

Email: anticamera@termoelectrica.md

Call center: 1300

Viber: (+373) 069 444 144

Verbal complaints could be recorded in writing by the receiver

The GRM procedure will be updated based on data provided by management of the beneficiary public buildings for every subproject, including the appointed person for GRM management at subproject level, available communication channels with the pupils, parents, teachers and contact data.

Grievances may be submitted anonymously using the dedicated phone numbers or installed mailboxes. All anonymous grievances and complaints should be addressed and recorded as well as other grievances and complainants, Confidentiality must be ensured in all cases, including the case when the person submitting the appeal choses anonymity.

The Project treats sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the WB ESF Good Practice Note on SEA/SH.<sup>6</sup> For GBV, and particularly for SEA/ SH complaints, there are risks of stigmatization, rejection and reprisals against survivors.

Taking into account the standards regarding the prevention of SEA/SH, which, in accordance with the requirements of the World Bank, must be observed in all projects financed by the World Bank, these standards will be observed, and responsibilities take action to raise awareness on the prevention and

 $<sup>^6 \</sup> https://thedocs.\underline{worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf}$ 

suppression of SEA/SH and operate a GRM employing a survivor-centric approach. The Project staff and contractors will be informed of SEA/SH prevention and oversight principles, including confidentiality and obtaining consent from the survivor for reporting complaints, at all stages of the Project implementation.

GRM will ensure access and confidentiality of a complaint filing mechanism and will allow an applicant to provide consent and to not to be afraid of possible retaliation. The SEA / SH issues will require adoption of certain additional measures:

- Gender sensitivity will be sought in the employment of Social Specialist, who will work at MEPIU.
- Social specialists will be informed about SEA/SH issues.
- In addition to the socio-cultural characteristics and nonviolent communication ways in the training of workers, SEA/SH will also be on the agenda. Worker training will include the following information on SEA / SH:
  - Definition of violence against women in national and international documents;
  - Types of violence (physical, sexual, economic, emotional);
  - Legal sanctions;
- The grievance mechanism will be accessible and ensure the confidentiality of personal information.
- Information activities will be carried out to inform women about the mechanism and children on additional protection issues and measures.
- The confidentiality principle of the grievance mechanism will be repeated in all information materials.
- The GRM will employ a survivor centered approach including requiring a consent from the survivor to log and report the complaint.
- The GRM will include special measures for child protection given that activities will take place in school environments.

The Project will utilize additional mitigation measures proportional to risk. The contractor will be responsible for developing the workforce management procedure, occupational health and safety plans as well as SEA/SH protocols which will apply to their own and subcontractors' employees who work on the Project. These procedures and plans will be submitted to MEPIU for review and approval before the contractors are allowed to mobilize to the field of construction. All contractors will be required in the contract to commit against the use of child and forced labor, introduce mitigation measures against SEA/SH, and MEPIU staff in charge of contractor supervision will monitor and report the absence of forced labor and cases of SEA/SH. All personal data and complaints received by the GRM will be treated in a confidential manner unless the complainants consent to the disclosure of their personal information. Especially, the confidentiality of sensitive issues and complaints related to SEA/SH raised by communities will be followed.

We use this SEP to provide contacts where to receive support: SEA/SH green-line 0 8008 8008. This is a green line for women and girls suffering from domestic abuse, victims of trafficking in human beings, victims of sexual exploitation. The list of GBV service providers/ NGOs is available www.stopviolenta.md<sup>7</sup>.

The emergency line 112 service also will redirect all calls coming from women-victims of domestic violence to the Trust line for Women and Girls, in the cases when the beneficiary refuses police intervention or is in a state of crisis and requires emotional support and psychological counselling. The redirection will also happen when the beneficiaries will need information about their rights and the services available to them. This is possible since December 2020, when La Strada and 112 emergency service have signed an

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<sup>&</sup>lt;sup>7</sup> https://stopviolenta.md/index.php?do=feedback

agreement of collaboration, under which La Strada have inclusively offered training support and capacity building for the 112 operators in the field of domestic and sexual violence.

#### World Bank's corporate Grievance Redress Service

The Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of WB noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <a href="https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service">https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service</a>. For information on how to submit complaints to the World Bank Inspection Panel, please visit <a href="https://www.inspectionpanel.org">www.inspectionpanel.org</a>.

#### 8.3.2. Grievances receipt and recording

The person receiving the grievance will complete a grievance form (*see Annex 1*) and will record the grievance in the Grievance Tracking Register, kept under STEEM.

The MEPIU's social specialist will have the responsibility to record the grievances received at Project level and to include in the Project Grievance Tracking Register all Project grievances, included those received at subproject by TE, managers of public/ administrative buildings and education facilities, and contractors and supervision consultants. The appointed persons by the beneficiary institutions, Contractor and supervision consultants at subproject level will have the responsibility to manage the grievances, including their reception, recording and monitorization of the resolution.

The Social specialist will inform the MEPIU's director on every received grievance both at Project level and subproject level (based on information reported by beneficiary institutions, contractors and consultants) and will agree together the proposed action and measures if necessary, and on other team's members or institutions to be involved in order to solve the grievance and to respond to the complainant/applicant.

#### 8.3.3. Acknowledgement and follow-up.

Once the investigation process has been established, the social specialist/ appointed persons enters this data into the Grievance Tracking Register and informs the complainant that his/her grievance was received, and the timeframe expected for the response. The information provided to complainant would also include, if required, the likely procedure if complaints had to be escalated outside the MEPIU and the estimated timeline for each stage

The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications. Once a month, the Social Specialist should submit to MEPIU's Director a list of all complaints received, at Project and subproject level the follow-up required, and the status of complaints from the previous month ("on-going" or "addressed").

#### 8.3.4. Grievance Closure

The timeline for response to a grievance will not exceed 14 working days. The term can be justified extended up to 20 working days (the complainant will be informed about extension).

A grievance will be "closed" when a resolution satisfactory to all parties has been reached. In certain situations, however, it is possible to "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or if there is an obvious speculative or fraudulent attempt.

In such situations, the efforts to investigate the complaint and to arrive at a conclusion will be well documented and the complainant will be advised of the situation.

If the complainant is not satisfied by the response or the proposed solution, he/she may appeal to court.

The results of investigation and the proposed response to the complainant will be presented for approval to MEIU's director. Once a decision has been made and the complainant informed, the social specialist / appointed persons describe the actions to be taken in the grievance form (see Annex 1), along with the details of the investigation and the findings.

The answers to the anonymous grievances will be placed on MEPIU web site and on information boards at subproject level.

#### 8.3.4. Monitoring and Reporting

Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. MEPIU will develop and maintaining a grievance register and maintain records of all steps taken to resolve grievances or otherwise respond to feedback and questions.

MEPIU will monitor grievances routinely as part of the broader management of the Project. This entails good record keeping of the grievances raised throughout the life of the Project.

All involved parties / appointed persons at subprojects level will direct all grievances to MEPIU and their resolution status if it was decided to solve these grievances at subproject level. The grievances that cannot be solved at subproject level by appointed persons, will be taken over by MEPIU for subsequent resolution.

The MEPIU's social specialist will compile the information provided from subprojects and will develop quarterly reports to Project's management and to the World Bank.

When receiving feedback, including grievances, the following is defined:

- Type of appeal;
- Category of appeal;
- People responsible for the execution of the appeal;
- Deadline of resolving the appeal;
- Agreed action plan.

These grievance reports will be developed based on Grievance Recording, Grievance Tracking Registers and results of other consultation and engagement activities and will include:

• The number of grievances logged in the proceeding period by level (at project or subproject level) and category and type.

- The number of the solved grievances, including the answers provided to the questions, requests for information, suggestions and proposals and other received feedback through the Project's GRM.
- The number of the grievances under examination.
- The number of the grievances with the accepted resolution.
- The number of the grievances with the partially accepted resolution.
- The number of the grievances with the not accepted / rejected resolution.
- The most frequent questions and requests/suggestion/proposals or feedback.
- The planned or carried out actions and measures based on received feedback, such as for example: informational materials development on specific subjects, additional information provided using the social media channels and the internal groups on Viber or WhatsApp, groups meetings or workshop with a specific stakeholders group etc.

This GRM can be revised and updated based on the proposals, comments and suggestions received both form the participants in the GRM operation and Project's beneficiaries and stakeholders.

#### 8.3.5. Information on GRM

Information about the GRM will be publicized as part of the initial program consultations and disclosure in all the participating institutions. Brochures/leaflets will be distributed during consultations and public meetings, and posters will be displayed in public places, on information boards and mailboxes such as in public buildings that benefit from project's investments etc. Information about the GRM will also be posted online at the websites of MEPIU, TE, NCSE. The overall grievance resolution framework will include six steps described below.

#### 8.4. 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 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 examination 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.

#### 8.5. Grievance Mechanism for Project's Workers

A grievance Mechanism for Project's workers will be established under the STEEM project according to the provision of the World Bank's ESS2. The objective of this procedure is to settle the grievance between an employer and employee or between employees bilaterally before the intervention of a formal court, except in cases where the grievance constitutes a criminal offense that requires notifying law enforcement. Under the provisions of ESS2, the project will provide a grievance mechanism for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. The project will put in place measures to make the worker grievance mechanism easily accessible to all project workers.

The Contractors should consider streamlined procedures to address specific worker grievances, which would allow workers to quickly report labor issues, such as a lack of PPE, lack of proper procedures or unreasonable overtime, and allow the project to respond and take necessary action. The MEPIU's social specialist and environmental, health and safety specialist will also provide overall implementation and capacity building support on resolving all workers grievances. They will also include workers grievance status in the progress report.

The Grievance Mechanism for Project's workers are detailed in the Labor Management Procedures prepared for the Project.

#### 9. MONITORING AND REPORTING OF THE SEP

MEPIU will maintain a database and activity file detailing all public consultation, disclosure information and grievances collected throughout the Project, which will be available for public review on request.

MEPIU will also closely monitor the effective implementation of all safeguards' instruments (ESMF, SEP, ESMPs and the GRM developed under the Project).

#### 9.1. Progress Reports

MEPIU will prepare and will submit to WB and other interested parties the quarterly Project's progress reports that will include the information on stakeholder engagement activities:

- Status of the establishment of the GRM at Project and subprojects levels;
- Information about received grievances recorded into GRM log;
- Activities conducted;
- Public outreach activities (meetings with stakeholders and newsletters);
- The additional actions taken based on the received feedback from the stakeholders;
- The number of site visits and their outcome;
- New stakeholder groups (where relevant);
- Some updates to the SEP if necessary.

#### Stakeholder Engagement Plan Sustainable Transition Through Energy Efficiency in Moldova

#### 10. REFERENCES

The World Bank Environmental and Social Management Framework, the World Bank, 2017 ESS10 Guidance Notes, the World Bank, 2017

The draft Project Appraisal Document, the Word Bank Document, 2023

Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, the World Bank, 2018

Legislation of Republic of Moldova on public information, environmental impact assessment, health and safety and petitions

### 11. ANNEXES

## **Annex 1: Grievance/inquiry record**

GRIEVANCE/INQUIRY RECORD (Form A)				
Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attachany supporting documentation/letters as relevant.				
Date Grievance Received:		Name of Sta	off Completing Form:	
Grievance Received (check √):  □ National □ Oblast □ Rayon □ Village				
Mode of Filing Inquiry or Grievance (check $$ ):				
□ In person □ Telephone □ E-mail □ Phone Text Message □ Website				
□ Grievance/Suggestion box □ Community meeting □ Public consultation □ Other				
Name of Person Raising Grievance: (information is optional and always treated as confidential)				
Gender: □ Male □ Female				
Address or contact information for Person Raising Grievance: (information is optional and confidential)				
Location where grievance/problem occurred [write in]				
National:	Oblast:	Rayon:	Village:	
Brief Description of Grievance or Inquiry: (Provide as much detail and facts as possible)				
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 MERP 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):				

#### Stakeholder Engagement Plan

Sustainable Transition Through Energy Efficiency in Moldova

Annex 2: List of the buildings that will benefit from planned investment under component 1

To be included in the SEP after the selection process is completed.

#### Stakeholder Engagement Plan

Sustainable Transition Through Energy Efficiency in Moldova

Annex 3: List of the buildings that will benefit from planned investment under component 2

To be included in the SEP after the selection process is completed.

### **Annex 4: Public Consultation Report**

- 1. Introduction
- 2. Dissemination process
- 3. Methodology for feedback collection
- 4. Consultation Results
- 5. Minutes of Meetings and Photos



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