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International

BELARUS BRIDGES PROJECT

STAKEHOLDER ENGAGEMENT PLAN



Bridge over the Neman River at the 65,774 km of the P-41 road



Bridge over the Berezina River at 230,961 km of the P-43 road

October 2019

BELARUS BRIDGES PROJECT

STAKEHOLDER ENGAGEMENT PLAN

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LIST OF ABBREVIATIONS

E&S	Environmental and social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment (or OVOS as per the national abbreviation)
ESAP	Environmental and Social Action Plan
IFI	International Financial Institution
NGO	Non-governmental organisation
PR	Performance Requirement (of EBRD)
RUE	Republican Unitary Enterprise
SEP	Stakeholder Engagement Plan

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1. INTRODUCTION

The State Programme for the Development and Maintenance of the Automobile Roads in the Republic of Belarus for the 2017-2020¹ and the Action Plan² of the Ministry of Transport and Communications of the Republic of Belarus describe the necessity and sequence of the modernisation of bridges in Belarus, including with support of international lenders. The State Programme includes the reconstruction and modernization of 12 regional bridges in Belarus (**Figure 1**), which are in the state of the urgent need of repair (the Project). The European Bank for Reconstruction and Development (EBRD) is considering providing funding to the Government of Belarus to implement the Project.

2. THE PURPOSE AND OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN

The EBRD has categorised this Project as 'B' in accordance with the EBRD's Environmental and Social Policy (2014) and requires preparing a Stakeholder Engagement Plan (SEP), Environmental and Social Audit and Assessment, Non-Technical Summary (NTS) and Environmental and Social Action Plan (ESAP) for the Project.

This document represents the Project's SEP prepared in compliance with the requirements of the EBRD's Environmental and Social Policy. The SEP's objectives are to:

- identify all Project stakeholders, including those who might be considered vulnerable and might need more support during the consultation process;
- ensure that the information on environmental and social aspects of the Project is timely provided and properly communicated to the Project's stakeholders, and the feedback communication channels are available to the them;
- define the means of engaging with the identified stakeholders in a meaningful and culturally appropriate way;
- ensure that there is a procedure or a mechanism for receiving grievances and suggestions from affected stakeholders and they are responded to and managed appropriately.

Thus, the SEP presents the planned stakeholder engagement process for the Project and outlines a systematic approach aimed at developing and maintaining constructive relationships with stakeholders for 2019 - 2020. It is a living document and is meant to be annually analysed, updated and developed further as the Project progresses.

¹ State Program for the Development and Maintenance of the Automobile Roads in the Republic of Belarus for the 2017-2020 Period (Decree of the Council of Ministers No.699 dated 18.09.2017).

² Action Plan of the Ministry of Transport and Communications of the Republic of Belarus for the preparation for the reconstruction of the priority bridges with the involvement of financial resources of credit institutions (approved on 29.05.2018).

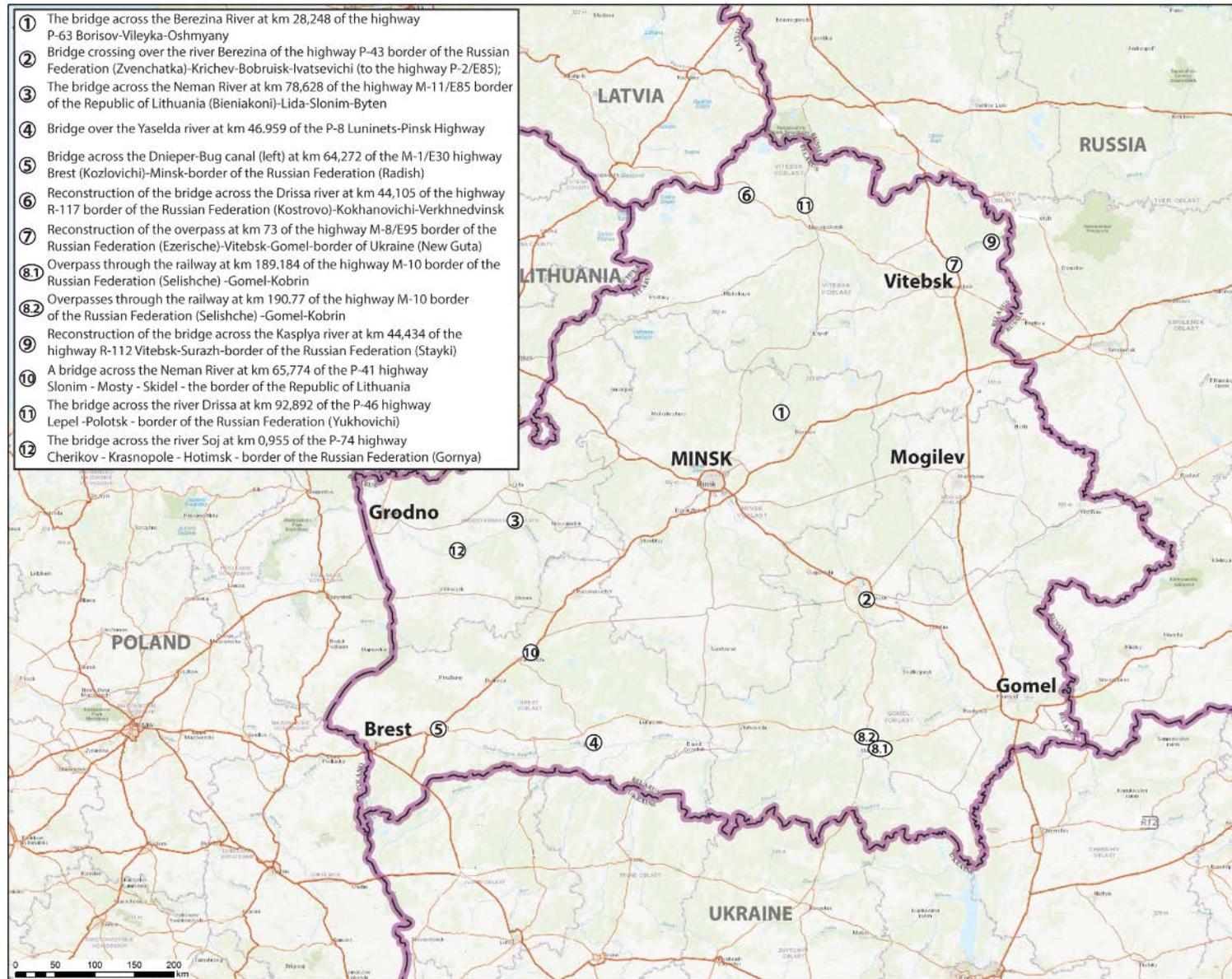


Figure 1. The bridges to be reconstructed and modernised, Belarus

3. PROJECT DESCRIPTION

The main aim of the Project is to ensure the safe operation of the bridges that are in dilapidated condition by either reconstructing their supporting and span structures or dismantling some of them and constructing new bridges nearby. The implementation of the Project will contribute to increased safe road traffic and will prevent the closure of the dilapidated bridges, as well as the arrangement of detours of various lengths. The bridges to be reconstructed are listed in **Table 1**.

The pre-project design documentation (i.e. 'the justification of investments') and the national environmental impact assessment (EIA or OVOS) reports were developed for each Project bridge.

The EBRD's loan is expected to be signed by the Government of Belarus. The Ministry of Transport and Communications of Belarus will represent the Government of Belarus within the Project and will act as the Implementing Agency. Within the Ministry of Transport and Communications of Belarus, the coordination of works will be entrusted to the Republican Unitary Enterprise MinskAutodor-Centre³ (the Company). MinskAutodor-Centre will manage the day-to-day preparation and implementation of the Project, including holding the tenders, selecting and hiring contractors for reconstruction works, and taking the responsibility for complying with national and international regulations and EBRD requirements. The Regional Autodor Republican Unitary Enterprises (RUEs) will assist the Company in implementing the Project.

4. REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

4.1. Legislative Requirements of Belarus

In Belarus, the legislation requires that the public must be informed about the aims and impacts of a project during the pre-investment stage. National EIAs are developed while preparing the 'Justification of investments' for projects, and the EIA reports are disclosed for public discussions. The EIA materials are beforehand published on the official websites of the Regional Autodor Centres and municipal authorities to provide the public with an opportunity to have access to, and to comment on, the information regarding the projects.

The following key legal acts related to the EIA procedure and information disclosure are applicable to the Project:

- The Law of the Republic of Belarus "On the state environmental expertise, strategic environmental assessment and environmental impact assessment" No.399-3 dated 18 July 2016 (as an edition of 15 July 2019, No. 218-3).
- Decree of the Council of the Ministers of the Republic of Belarus "On the regulations of the procedure for organising and conducting public discussions on the environmentally significant draft decisions, environmental impact

³ The MinskAutodor-Center's mission is the implementation of the roads-development projects according to the national standards; the organization also has experience in the implementation of the projects according to the requirements of International Financial Institutions (IFI), being involved in several IFI-financed projects. The organisation is also certified against the national analogues of ISO 9002, ISO 14001 and OHSAS 18002.

assessment reports, recording of environmentally significant decisions” No.458 dated 14 June 2016.

- Decree of the Council of the Ministers of the Republic of Belarus “On the regulations on the procedure on conducting state environmental expertise, including the requirements for the composition of the documentation, submitted for state environmental expertise, the conclusion of state environmental expertise, the procedure for its approval and (or) cancellation, special conditions of the implementation on the project decisions, as well as requirements for specialists, conducting the state environmental expertise” No.47 dated 19 January 2017.
- Decree of the Council of the Ministers of the Republic of Belarus “Regulation of the procedure on conducting environmental impact assessment, requirements for the composition of the report on environmental impact assessment, requirements for specialists performing environmental impact assessment” No.47 dated 19 January 2017.
- Resolution of the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus “On approval and enactment of a technical normative legal act” No.1-T dated 5 January 2012.

According to Article 7 of the Law of Belarus “On the state environmental expertise, strategic environmental assessment and environmental impact assessment” No.399-3 (2016), the objects that are to be reconstructed fall into the category of the objects requiring EIA. Thus, according to the “Procedure on conducting environmental impact assessment, requirements for the composition of the report on environmental impact assessment, requirements for specialists performing environmental impact assessment” (2017), the stages of the EIA include holding public discussions of the EIA reports and finalizing these EIA reports considering the comments and suggestions received from the affected parties during public discussions (disclosure).

According to the legislation of Belarus, the procedure for conducting public discussions of the EIA reports include the following stages:

- Notification of the citizens and legal entities about the public discussions⁴;
- Ensuring an access for citizens and legal entities and posting the EIA report in the section “Public Discussions” on the official website of the organisers of the public discussions;
- Provision of opportunity to send the questions, comments and suggestions on the published reports;
- The formation of the commission for preparing and conducting the public discussions, determination of its composition and appointment of the chairman of the commission is done by the local Council of Deputies, local executive and

⁴ “Public discussions of projects of environmentally significant decisions, reports on environmental impact assessment, environmental reports on strategic environmental assessment - a set of mandatory measures to inform citizens and legal entities about projects of environmentally significant decisions, environmental impact assessment reports, environmental reports on strategic environmental assessment, as well as the possibility of participants in public discussions to express their attitude to these projects, reports in order to take into account the public interest and the rights of citizens and legal entities”, as per the Law of the Republic of Belarus №1982-XII “On Environmental Protection” dated 26 November 1992 as amended by the Law of the Republic of Belarus № 201-3 dated 18 June 2019. To note, public discussions do not imply direct (personal) communication, such as community meetings or public hearings.

regulatory authority no less than 3 days before the date of the publication of the notification about the public discussions;

- If the public appeal is received within 10 working days from the date of publication of the notification, stating that it is necessary to hold a meeting to discuss EIA report, the meeting may be scheduled no earlier than 25 calendar days from the start date of the public discussions and no later than the day of their completion;
- Based on the results of the meeting to discuss the EIA, minutes of meeting are drawn up within five working days from the day of the meeting, which includes a list of questions, comments and suggestions received during the meeting, indicating their authors and reasoned answers to them and the general the number of participants in the meeting;
- Based on the results of public discussions, minutes of meeting of public discussions, indicating the number of the participants and conclusions and suggestions of the commission on the preparation and holding public discussions, is drawn up within 10 working days after the completion of public discussions. The minutes of meeting is then published in the “Public Discussions” section on the official website of the organisers of the public discussions.

It is noteworthy that no public meeting/hearing to discuss an EIA report is held if, within 10 working days of publishing the notification about the start of public discussions, the public has not contacted the relevant local executive and administrative authorities with a request to conduct such.

4.2. EBRD Requirements

According to the EBRD’s Environmental and Social Policy (2014), all EBRD clients should comply with the relevant national legislation related to information disclosure and stakeholder engagement, as well as with the PR 10 requirements.

The EBRD recognises the importance of an open and transparent engagement between the Company, its workers, local communities directly affected by the project and, where appropriate, other stakeholders as an essential element of good international practice and corporate citizenship⁵. Such engagement is also a way of improving the environmental and social sustainability of projects. In particular, effective community engagement, appropriate to the nature and scale of the project, promotes sound and sustainable environmental and social performance, and can lead to improved financial, social and environmental outcomes, together with enhanced community benefits. Stakeholder engagement is central to building strong, constructive and responsive relationships which are essential for the successful management of a project’s environmental and social impacts and issues.

PR 10 implies that the stakeholder engagement is an ongoing process that requires public disclosure of appropriate information, meaningful consultation with stakeholders and an effective procedure or mechanism by which people can make comments or raise grievances.

According to PR 10, stakeholder engagement involves the following elements:

⁵ EBRD Performance Requirement 10 Information Disclosure and Stakeholder Engagement. 2014.

A. Engagement during Project Preparation

- **Stakeholder identification and analysis:** The Company should identify and document the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project (affected parties); or (ii) may have an interest in the project (other interested parties). Individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status should also be identified by the Company.
- **Stakeholder engagement planning:** The Company should develop a SEP that is appropriate to the nature and scale or risks, impacts and development stage of the project. SEP will outline how communication with identified stakeholders will be handled throughout project preparation and implementation, including grievance procedure envisaged.
- **Disclosure of information:** The Company should disclose all the relevant project information in order for stakeholders to understand the risks, impacts and opportunities of the project. The information should be disclosed in the local language(s) and in a manner that is accessible and culturally appropriate.
- **Consultation and participation:** The Company should ensure a meaningful two-way consultation process, which is inclusive and culturally appropriate and represents the views and specific needs of various groups, as identified in the SEP or made aware during the implementation of the SEP. Where affected communities may be subject to significant adverse future impacts from a project, the Company will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts and mitigation measures, and allows the Company to consider and respond to them.

B. Engagement during Project Implementation and External Reporting

- **Grievance mechanism:** The Company will need to be aware of and respond to stakeholders' concerns related to the project in a timely manner. For this purpose, the Company will establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances, in particular, about the Company's environmental and social performance. The grievance mechanism should be scaled to the risks and potential adverse impacts of the project.
- **Ongoing reporting to relevant stakeholders:** For all projects, the Company will provide information to identified stakeholders, on an ongoing basis, appropriate to the nature of the project and its adverse environmental and social impacts and issues, and the level of public interest throughout the life of the project.

5. PREVIOUS AND ONGOING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Company's Stakeholder Engagement Experience

The Company has experience in implementing projects financed by the IFIs such as World Bank, European Investment Bank and EBRD. For example, when implementing the reconstruction of the P-80 Motorway between Sloboda and Papernya, km 0.000 – km.14.770 project, the Company has undertaken the activities as per EBRD's Environmental and Social Policy requirements, including the

development and disclosure of Environmental and Social Impact Assessment, Stakeholder Engagement Plan, Environmental and Social Action Plan, etc. Among the other projects, financed by the IFIs and executed by the Company are the reconstruction of the roads M-7 km 42 – km 91 and M-3 km 8.6 – km 56. The Company states that a specific project implementation group has been created within the organisation in order to ensure the successful implementation of international projects of any complexity according to the required policies and standards.

The information about the Project's planned activities and respective EIA reports, including the results of the public consultations, has not been combined and posted in a consolidated manner on the Company's website. Since the bridges are located in different regions, the information is disclosed on the websites of the corresponding regional Autodor Centres and District Executive Committees. More observations on the existing gaps of the stakeholder engagement process against the EBRD PR10 are given in **Section 5.3**.

5.2. Project-related Stakeholder Engagement Experience

The information disclosure and stakeholder engagement process has been organised according to the requirements of the national legislation. Thus, the public discussions of the EIA reports (OVOSs), associated with the Project activities, have been conducted (**Table 1**).

As of September 2019, no suggestions or proposals on conducting public meetings to discuss the EIA reports on Bridges No.3,4,5,6,7, and 9 have been received from the public by the corresponding District Executive Committees. Nor have any comments on the respective EIA reports have been received from the public. The remaining District Executive Committees have not yet published the results of public discussions or minutes of meetings on their official websites.

5.3. Main Gaps of the Existing Stakeholder Engagement Process against EBRD PR10

The following gaps have been observed when analysing the current Project stakeholder engagement process during the Environmental and Social Audit and Assessment:

- Lack of stakeholder identification and analysis
- No focus on the project affected people and vulnerable groups
- Stakeholder engagement is considered as a one-time event within the EIA process
- No grievance mechanism
- No stakeholder engagement monitoring

These gaps will be addressed through the implementation of the Stakeholder Engagement Programme (**Table 3**).

Table 1. Public discussions of the EIA reports

Bridge No.	Name of the bridge	Region	Publishing Agency	Disclosed Information	Start date of public discussions	End date of public discussions
1	Bridge over the Berezina River at km 28,248 of the highway P-63 Borisov-Vileyka-Oshmyany	Borisov District of Minsk Oblast (Region)	MinskAutodor Centre, Borisov District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> on the official website of MinskAutodor http://maddor.by/uvedomlenie-o-provedenii-obshhestvennogo-obsuzhdeniya-po-otchetu-ob-oczenke-vozdjeystviya-na-okruzhayushhuyu-sredu-po-obektu-most-cherez-r-berezina-na-km-28-248-avtomobilnoj-dorogi-r-63-borisov/ on the official website of the Borisov District Executive Committee in the “Public Discussion” section http://www.borisov.minsk-region.by/obshchestvennye-obsuzhdeniya in the newspaper “Borisov advertising” annexed to the newspaper «Адзінства» No. 31 dated 07.08.2019 	07.08.2019	06.09.2019
2	Bridge over the Berezina River at 230,961 km of the highway P-43, border of the Russian Federation (Zvenchatka)-Krichev-Bobruisk-Ivatsevichi (to the highway P-2/E85)	Bobruisk District of Mogilev Region	MogilevAutodor, Bobruisk District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> on the official website of the MogilevAutodor www.mogilevautodor.by on the official website of the Bobruisk District Executive Committee www.bobruisk.gov.by in the newspaper «Бабруйскае жыццё» №15 dated 15.04.2015 	16.04.2015	16.05.2015
3	Bridge Over the Neman River at km 78,628 of the highway M-11/E85 border of the Republic of Lithuania (Bieniakoni)-Lida-Slonim-Byten	Lidsk District of Grodno Region	GrodnoAutodor, Lida District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> in the “Public Hearings” section of the Lida District Executive Committee’s official website https://lida.gov.by/ru/uvedomlenie-ob-obschestvennyx-obsuzhdenijax-otcheta-ob-otsenke-vozdjeystviya-na-okruzhajuschuju-sredu-dalee-ovos-po-objektu-most-cherez-rneman-na-km78628-avtomobilnoj-dorogi-m-11e85-grlitovskoj-respubliki-benjakoni-lida-slonim-byten-ru/ on the official website of GrodnoAutodor http://grodnoautodor.by/2019/07/09/uvedomlenie-ob-obshchestvennom-obсужде/ 	10.07.2019	08.08.2019

Bridge No.	Name of the bridge	Region	Publishing Agency	Disclosed Information	Start date of public discussions	End date of public discussions
4	Bridge over the Yaselda River at km 46,959 of the P-8 Luninets-Pinsk Highway	Pinsk District of Brest Region	BrestAutodor, Pinsk District Executive Committee	<p>Announcement about the public discussions are published:</p> <ul style="list-style-type: none"> on the official website of the BrestAutodor http://www.brestAutodor.by/ovos?id=1057 on the official website of the Pinsk district Executive Committee http://pinsk.brest-region.gov.by/index.php?option=com_content&view=article&id=57923%3A-l-46959-8-r&catid=765%3A2013-06-24-11-26-45&Itemid=2760&lang=ru in the newspaper «Полесская правда» dated 27.07.2019. 	29.07.2019	01.09.2019
5	Bridge over the Dnieper-Bug Canal (left) at km 64,272 of the M-1/E30 highway Brest (Kozlovichi)-Minsk-border of the Russian Federation (Redka);	Kobrin District of Brest Region	BrestAutodor, Kobrin District Executive Committee	<p>Announcement about the public discussions are published:</p> <ul style="list-style-type: none"> on the official website of the BrestAutodor http://www.brestAutodor.by/ovos?id=1059 on the official website in the “Public Discussions” section of the Kobrin district executive committee - http://kobrin.brest-region.gov.by/index.php?option=com_content&view=article&id=57945%3A-l-64272-130-r&catid=748%3A2013-03-26-12-42-07&Itemid=2751&lang=ru in the newspaper «Кобрынскі Вестнік» dated 31.07.2019. 	31.07.2019	01.09.2019
6	Reconstruction of the bridge over the Drissa River at km 44,105 of the highway P-117 border of the Russian Federation (Kostrovo)-Kokhanovichi-Verkhnedvinsk	Verkhnedvinsk District of Vitebsk Region	VitebskAutodor, Verkhnedvinsk District Executive Committee	<p>Announcement about the public discussions are published:</p> <ul style="list-style-type: none"> in the “Public Discussions” section of the official website of the Verkhnedvinsk District Executive Committee http://verkhnedvinsk.vitebsk-region.gov.by/ru/obschestvennoe-obs/ on the official website of the VitebskAutodor http://www.vitavtodor.by in the Verkhnedvinsk newspaper «Двинская правда» dated 11.06.2019 	11.06.2019	10.07.2019

Bridge No.	Name of the bridge	Region	Publishing Agency	Disclosed Information	Start date of public discussions	End date of public discussions
7	Overpass at km 73 of the highway M-8/E95 border of the Russian Federation (Ezerische)-Vitebsk-Gomel-border of Ukraine (New Guta)	Vitebsk District of Vitebsk Region	VitebskAutodor, Vitebsk District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> on the official website of the VitebskAutodor www.vitavtodor.by on the official website of the Vitebsk District Executive Committee http://www.vitebsk.vitebsk-region.gov.by/ru/obshchestvennye-obsuzhdeniya-i-izuchenie-mneniya-grazhdan in the newspaper of the Vitebsk region «Жыцце Прыдзвіння» Issue No. 39(9820) dated 25.05.2019 	25.05.2019	24.06.2019
8.1.	Overpass over the railway at km 189,184 of the highway M-10 border of the Russian Federation (Selishche)-Gomel-Kobrin	Kalinkovichi District of Gomel Region	GomelAutodor, Kalinkovichi District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> on the official website of GomelAutodor https://gomad.by/202-uvedomlenie-o-nachale-protsedury-obshchestvennykh-obsuzhdenij-s-15-08-2019-po-13-09-2019-goda.html on the official website in the section "Public Discussions" of the Kalinkovichi district executive committee http://kalinkovichi.gomel-region.by/ru/obshestvennieobsyuzdeniya/ 	15.08.2019	13.09.2019
8.2.	Overpasses over the railway at km 190,77 of the highway M-10 border of the Russian Federation (Selishche)-Gomel-Kobrin	Kalinkovichi District of Gomel Region	GomelAutodor, Kalinkovichi District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> on the official website of the GomelAutodor – https://gomad.by/202-uvedomlenie-o-nachale-protsedury-obshchestvennykh-obsuzhdenij-s-15-08-2019-po-13-09-2019-goda.html on the official website in the section "Public Discussions" of the Kalinkovichi district executive committee http://kalinkovichi.gomel-region.by/ru/obshestvennieobsyuzdeniya/ 	15.08.2019	13.09.2019

Bridge No.	Name of the bridge	Region	Publishing Agency	Disclosed Information	Start date of public discussions	End date of public discussions
9	Bridge over the Kasplya River at km 44,434 of the highway P-112 Vitebsk-Surazh-border of the Russian Federation (Stayki)	Vitebsk District of Vitebsk Region	VitebskAutodor, Vitebsk District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> on the official website of the VitebskAutodor http://www.vitavtodor.by/about/info/messages/397/?sphrase_id=123 on the official website of the Vitebsk District Executive Committee http://www.vitebsk.vitebsk-region.gov.by/ru/obshchestvennye-obsuzhdeniya-i-izucheniye-mneniya-grazhdan in the newspaper of the Vitebsk region “Жыцце Прыдзвіння” Issue No. 51 (9832) dated 06.07.2019 	06.07.2019	05.08.2019
10	Bridge over the Neman River on the 65,774 km of the P-41 road section Slonim - Mosti - Skidel - border with Lithuania (Poreche)	Mostovsk District of Grodno Region	GrodnoAutodor, Mosty District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> in the “Public Discussions” section of the official website of the Mosty District Executive Committee http://mosty.grodno-region.by/ru/obschestvennye-slushaniya-ru/ on “Announcement” section on the official website of the GrodnoAutodor http://grodnoautodor.by/объявления/ 	21.08.2019	23.09.2019
11	Bridge over the Drissa River at km 92,892 of the P-46 highway Lepel-Polotsk - border of the Russian Federation (Yukhovichi)	Rossonsk District of Vitebsk Region	VitebskAutodor, Rossonsk District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> in the “Public Discussions” section of the official website of VitebskAutodor http://www.vitavtodor.by/about/info/messages/399/?sphrase_id=123 in the “Public Discussions” section of the official website of the Rossonsk District Executive Committee http://rossony.vitebsk-region.gov.by/ru/obsydz/ in the regional newspaper «Голас Расоншчыны» dated 27.07.2019 	27.07.2019	26.08.2019
12	Bridge over river Soj on the 0,955 km of the P-74 road section Cherikov - Krasnopolie - Hotimsk - border with Russian Federation (Gornya)	Cherikov District of Mogilev Region	MogilevAutodor, Cherikov District Executive Committee	Announcement about the public discussions are published: <ul style="list-style-type: none"> on the official website of the MogilevAutodor www.mogilevavtodor.by in the “Actual Information” section of the official website of the Cherikov District Executive Committee http://cherikov.gov.by/aktualnaya-inf/item/139-aktualnaya-informatsiya 	1.10.2019	1.11.2019

6. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholders are those individuals, groups of individuals or organisations that affect and/or likely to be affected (directly or indirectly) by the Project's activities, products or services and/or associated performance (affected parties) or may have an interest in the project (other interested parties).

According to EBRD PR10 stakeholders are various individuals/groups who (i) are affected or likely to be affected (directly or indirectly) by the project (affected parties); or (ii) may have an interest in the project (other interested parties).

Stakeholder identification and analysis are the key elements of the engagement planning process. They help to identify the relevant Project stakeholders and analyse their roles and interests in the Project.

6.1. Stakeholder Identification Methodology

A systematic stakeholder identification and analysis is the requirement of the EBRD and international good practice. The preliminary identification of stakeholders has been conducted for the Project using the following criteria:

- **Impact:** project implementation may significantly affect a given social group (affected parties).
- **Influence:** the social group is able to substantially influence the project implementation process.
- **Partnership:** there are opportunities for building partnership relations between the Company and a given social group.
- **Expressed interest:** a group or individuals, not necessarily directly affected by the project, may express interest to it.

6.2. Major Stakeholder Categories and Groups

The Project stakeholders have been grouped into the following two major categories:

- *Internal stakeholders* representing the organisations that undertake the Project and those who work within them such as management, staff, owners, shareholders, as well as contractors and subcontractors involved in the Project implementation and benefiting from it (investors and shareholders); and
- *External stakeholders* representing the groups or individuals that are not part of the organisations implementing the Project but are affected in some way by the decisions and actions of such organisations.

The SEP is intended to cover the Company's engagement with external stakeholders.

In order to ensure effective and meaningful engagement, the Project's external stakeholders have been clustered into the following groups:

- Affected parties;
- Vulnerable groups;
- Governmental authorities;
- Municipal authorities;

- Other stakeholders (civil society organizations, National Park or other protected areas, non-governmental organisations (NGOs), mass media, academia etc.)

6.3. Stakeholder Analysis

The groups that are mentioned above are described and analysed in terms of their relations to and/or interests in the Project (**Table 2**).

To note, the stakeholder list might change at each stage of the Project cycle and should be updated in such cases.

Table 2. Stakeholder identification and analysis

Potentially affected parties	
<p>The residents of the following settlements, located near the bridges:</p> <ul style="list-style-type: none"> • Veselovo, Kostyuki villages (bridge No. 1) • Bobruisk town (bridge No.2) • Tosino, Belitsa, Nesilovichi (bridge No.3) • Zaozerye, Gorodishe, Vulka-Gorodishenskaya villages (bridge No. 4) • Brilevo village (Bridge No.5) • Verhnedvinsk town (bridge No. 6) • Ruba, Senkovo villages (bridge No. 7) • Kalinkovichi town, Rudnya Antonovskaya, Rudnya Gorbovichskaya (bridges No. 8.1 and 8.2) • Surazh village (bridge No.9) • Mosty Levye, Mosty Pravye (bridge No. 10) • Kevly, Novye Zamshany villages (Bridge No.11) • Cherikov town (Bridge No.12) 	<ul style="list-style-type: none"> • Affected due to the temporary closure of the bridges, especially those who use the bridges daily to get to work, hospital, school, etc.; • Might have concerns regarding the temporary bypass roads (increased travel time, increased travel costs as more fuel can be spent); • Affected by the impacts of the construction activities including noise and vibration, air pollution with dust and construction transport emissions, pollution of the rivers due to dismantling and installation works, etc.; • Affected by the temporary deterioration of the rivers conditions where water is used for amateur fishing or household purposes (washing, watering, etc.); • Affected by transportation of construction materials and large-sized bridge structures through the settlements; • Affected by accommodating construction workers in the settlements or arranging temporary construction camps near the bridges to be reconstructed; • Interested in employment opportunities; • Interested in the Project details, impacts and progress.
<p>The users/owners of the lands that will be temporary or permanently used for the Project</p>	<ul style="list-style-type: none"> • Affected by the land acquisition process; • Interested in benefiting from the Project activities; • Interested in the Project details, impacts and progress.
<p>Users of the bridges (non-pedestrians, e.g., drivers and passengers), including the visitors to the nearby monuments, obelisks, sanatoriums, cemeteries</p>	<ul style="list-style-type: none"> • Affected by the temporary closure of the bridges; • Might have concerns regarding the temporary bypass roads; • Interested in the Project details, impacts and progress.
<p>Pedestrians using the bridges, including the visitors to the nearby monuments, obelisks, sanatoriums, cemeteries</p>	<ul style="list-style-type: none"> • Affected by the temporary closure of the bridges; • Interested in the information regarding the access roads to the destinations of their interest, pedestrian safety issues.
<p>Infrastructure owners and/or operators located near the bridges to be reconstructed</p>	<ul style="list-style-type: none"> • Affected by the construction activities; • Might expand the provision of the services; • Might experience a larger demand in their services such as waste removal, stormwater removal.

Small and medium enterprises located near the construction sites and their employees	<ul style="list-style-type: none"> Interested in raising revenues due to the Project activities; Might increase the number of workers due to higher workload; Might have concerns regarding the construction activities if the access roads and entrances are blocked due to the construction works.
Potentially vulnerable groups	
Pensioners/elderly, socially vulnerable groups such as those with disability, lack of housing, substance abuse, families registered as living below the poverty level	<ul style="list-style-type: none"> Might have difficulties to access information and use communication means; Might have difficulties in accessing the social infrastructure facilities, such as pharmacies, hospitals or shops; Interested in benefiting from employment opportunities and in the possible development of economic activities around the Project / worker needs.
Governmental authorities and their regional departments	
Ministry of Transport and Communications, Ministry of Natural Resources and Environmental Protection, Ministry of Forestry, Ministry of Internal Affairs, State Control Committee, Ministry of Housing and Utilities, Ministry of Labour and Social Protection, Ministry of Taxes, Ministry of Economy, Ministry of Finance, Ministry of Information, Ministry of Architecture and Construction, Ministry of Culture etc.	<ul style="list-style-type: none"> Various permitting, supervision, monitoring or inspection functions; Control of compliance with Belarussian law and policies; Allocation of the land resources.
Municipal authorities	
<ul style="list-style-type: none"> Borisov District Executive Committee (Bridge No.1) Bobruisk District Executive Committee (Bridge No.2) Lida District Executive Committee (Bridge No.3) Pinsk district Executive Committee (Bridge No.4) Kobrin district executive committee (Bridge No.5) Verkhnedvinsk District Executive Committee (Bridge No.6) Vitebsk District Executive Committee (Bridges No.7 and 9) Kalinkovichi District Executive Committee (Bridges No. 8.1. and 8.2.) Mosti District Executive Committee (Bridges No.10) Rossonsky District Executive Committee (Bridge No.11) Cherikov District Executive Committee (Bridge No.12) 	<ul style="list-style-type: none"> Will be closely engaged in the Project activities; Provide support to the Company in stakeholder engagement activities; Interested in the economic and infrastructure development of their territories owing to sustainable and safe road network.
Other stakeholders	

<p>“Srednyaya Pripyat” National Landscape Reserve Administration; “Biarezina-Hajna” Important Bird Area near the bridge over the Berezina River at km 28,248 of the highway P-63</p>	<ul style="list-style-type: none"> • Interested in the Project details, progress and impacts; • Interested in the environmental impacts of the Project activities and impacts associated with an increased access to the area.
<p>National and regional environmental and social NGOs: Belarusian Society for the Conservation of Nature, Mogilev environmental public association “ENDO”, Minsk City Branch of the International Public Association of Ecologists, Public association "Ecodom", International Public Association "Ecosphere", Belarusian Public Socio-Ecological Association "Green World" etc.</p>	<ul style="list-style-type: none"> • Interested in the Project details, progress and impacts; • Interested in financial / legal issues, rehabilitation, women rights, human rights, environmental issues, adults training and education, and community development; • Possible synergies with NGOs that are proactive in the region.
<p>Academic institutions: Belarus State University, Belarus State University of Transport, Brest State Technical University, Brest State A.S.Pushkin University, Vitebsk P.M.Masherov State University, Vitebsk State Technological University, Sukhoi State Technical University of Gomel, Yanka Kupala State University of Grodno, Mogilev State A.Kuleshov University etc.</p>	<ul style="list-style-type: none"> • Interested in conducting academic surveys, tests etc.; • Interested in participating in the EIA process and/or discussing the design and social and environmental aspects; • Interested in employment, incl. for graduates /internships and joint educational activities and trainings.
<p>Independent experts</p>	<ul style="list-style-type: none"> • Interested in providing their expertise services; • Interested in information regarding the Project’s impacts, progress and details.

7. STAKEHOLDER ENGAGEMENT PROGRAMME

The Stakeholder Engagement Programme (**Table 3**) has been prepared for 2019-2020 in order to ensure the successful information disclosure, communication and interaction process with the various stakeholder groups. The Programme should be updated in case of changed engagement mechanisms or identification of new stakeholders or any other circumstances that might affect the stakeholder engagement process.

Table 3. Stakeholder Engagement Programme for 2019-2020

No.	Activity	Target Group	Information Materials	Timeframe	Responsible party	Location
1	PROJECT DESIGN STAGE					
1.1.	Adoption and disclosure of the Environmental and Social Audit and Assessment package: SEP, ESAP, and NTS.	All stakeholders	SEP, ESAP, NTS	4 th Quarter 2019 (disclosed and kept accessible onwards)	The Company and Regional Autodor RUEs	The Company's website; Company's head office in Minsk; Relevant District Administrations
1.2.	Establishment of a grievance mechanism and notification of the public on the established grievance mechanism	All stakeholders	SEP, notification, information bulletins	4 th Quarter 2019 (established and maintained onwards)	The Company and Regional Autodor RUEs	The Company's website; Company's head office in Minsk; Information boards near the District Executive Committees, affected settlements, construction sites
1.3.	Media coverage	All stakeholders	Announcements in the newspapers, news channels, magazines about the Project works and progress, environmental and social impacts, press releases as news appear, announcement about public consultation meetings	3 rd and 4 th Quarters 2019	The Company and Regional Autodor RUEs	Respective media channels / means
1.4.	During the design process for each bridge, identify affected groups and hold face-to-face consultations with them	Affected groups	Notification, Information bulletins	Prior to construction works	The Company	Affected settlements
1.5.	Where Land Acquisition and Compensation Plans are prepared for certain bridges, undertake consultations with affected parties	Affected stakeholders	Notification, information bulletins or other printed materials	Prior to construction works	The Company	Affected settlements
2	PRE-CONSTRUCTION STAGE					

2.1.	Notification on the start of the Project construction works	Potentially affected and other stakeholders	Notification, Information bulletins	4 th Quarter 2019 – 1 st Quarter 2020	The Company and Regional Autodor RUEs	The Company's website, Information boards in the affected settlements on sites and/or in the administrative buildings of the local authorities
2.2.	Discussion with the public about: <ul style="list-style-type: none"> bypass routes for the construction period (where needed) the scheme of construction traffic during the construction period, routes of large-scale vehicles and heavy equipment movement. 	Land owners / users, local residents, other interested stakeholders	Informational leaflets, maps	2019-2020	The Company and Regional Autodor RUEs	Project - affected settlements
2.3.	Informing the public on the traffic safety measures during the construction period (including safety lessons at schools in the Project-affected settlements)	Land users, local residents and schoolchildren	Presentation materials	Prior to the construction works	The Company and Regional Autodor RUEs	Project-affected settlements
2.4.	Installation of information boards with contact details of the personnel of the Company and Regional Avtodor MUEs that are responsible for public communication during the Project in the affected settlements	Local residents	Information bulletins	Prior to the construction works	The Company and Regional Autodor RUEs	Affected settlements
2.5.	Consultations with the local authorities, communities and Museum of Local History representatives about the relocation of the WW2 monument to a new site.	Local residents	Notification, information bulletins, maps	Prior to construction works	The Company, the relevant regional Autodor, and contractors	Mosty Pravye and Mosty Levye villages, Grodno region
3	CONSTRUCTION STAGE					
3.1.	Installation of the boxes with the Public Grievance forms for suggestions and complaints	All stakeholders	Grievance forms	Simultaneously with the start of the site preparation works; the boxes to be checked twice a week	The Company and Regional Autodor RUEs; Contractors (if they receive the filled-out blanks, they should pass these to the Company or Regional Autodor RUEs)	Each construction site in the affected settlements, in the District Executive Committees

3.2.	Keeping a record of the received grievances (suggestions and inquiries) in the specific logbook(s)	All stakeholders	Grievance (Suggestion and Inquiry) Logbook	Throughout the Project cycle	The Company and Regional Autodor RUEs	The Company's Grievance (Suggestion and Inquiry) Logbook
3.3.	Provision of updates on the Project's status / progress	All stakeholders	Project's progress publications, radio and TV announcements	Throughout the construction stage	The Company and Regional Autodor RUEs	The Company's website, The website of the District Executive Committees, Media
3.4.	Organisation of meetings and consultations with the stakeholders on the topics raised by the stakeholders, when needed	All stakeholders	Specific information depending on the topics of interest	Throughout the Project	The Company and Regional Autodor RUEs	Various locations depending on the originator and types of questions

8. GRIEVANCE MECHANISM

In order to enable the affected or any other interested stakeholders to submit their grievances and/or suggestion about the Project's activities the Grievance Mechanism will be established by the Company. This Grievance Mechanism will allow the Company to respond and resolve the received grievances in a timely and effective manner. The contact details of the representative of the Company responsible for dealing with grievances and inquiries are provided below:

Name:	
Position:	
Address:	
E-mail:	
Telephone:	

A Public Grievance Form (**Annex 1**) is available for submitting grievances. Such forms will be available in the electronic format on the Company's website, as hard copies in the District Executive Committees, and in the boxes installed in the respective District Executive Committees, construction sites etc. However, grievances sent by email, written letters, text messages and telephone calls will also be registered and resolved. Grievances can be submitted anonymously, however, in order to have a follow-up and receive a written reply to a grievance it is recommended to provide contact details. All grievances will be acknowledged within five days. According to the national requirements, the maximum period of grievance handling is 15 days (in case of need, this period can be prolonged to one month)⁶. The prepared reply is approved by the Project management and sent to the grievance originator.

All the grievances raised to the Company and its contractors in relation to the Project will be recorded in the Community Grievance (and Inquiry) Logbook that should be maintained throughout the Project life-cycle.

9. MONITORING, EVALUATION AND REPORTING

Successful stakeholder engagement depends on continuous effort, performance monitoring and evaluation, and adapting to changed conditions and stakeholder information needs. In order to successfully organise, implement, evaluate, and report on the stakeholder engagement activities, the Company will appoint a designated personnel who will be responsible for these processes:

Name:	
Position:	
Address:	
E-mail:	
Telephone:	

⁶ According to the Law of the Republic of Belarus of July 18, 2011, No.300-3 "On Appeals of Citizens and Legal Entities" (as an addition from 15 July 2015, Law No. 306-3) and Decree of the President of the Republic of Belarus of October 15, 2007 No. 498 "On Additional Measures for Working with Appeals of Citizens and Legal Entities" (as an addition from 10 December 2018, Decree No.474), the information requests or appeals are to be considered within 15 calendar days from the day following the day of their registration. If necessary, the period for consideration of applications can be extended up to one month.

The following indicators will be used for monitoring and improving stakeholder engagement performance in support of the Project implementation:

- The SEP is developed, up to date, and available to the public for review/commenting.
- Actions listed in the Stakeholder Engagement Programme are completed in full and as scheduled.
- The topics that were discussed and the questions that were raised during the public consultations
- Number of stakeholders' comments and suggestions received by the Company (and its contractors) through various feedback channels.
- Number of stakeholders' grievances and claims regarding the Project (disaggregated by gender of complainant).
- Number of publications on the Project implementation process in local, regional, and national media.
- Type/category of stakeholder comments and suggestions addressed by Company and through what means.
- Key categories of grievances received by the Company or its contractors (employment, permanent or temporary land use, environmental issues, labour relations, etc.).
- Number of grievances resolved within the maximum established timeline.
- Number of grievances remaining unresolved.

The SEP should be periodically evaluated by the Company as the Project progresses in order to identify activities that might need any corrective and/or preventative measures with the purpose to improve the efficiency of its performance. In such cases the SEP should be updated and shared with the public with the amendments made.

In order to reflect the progress of the SEP implementation the monthly analysis will be conducted by the Company internally, which will be used to develop the annual reports.

The Company will also prepare annual reports on the Project's environmental and social performance and make them publicly available.

ANNEX 1. PUBLIC GRIEVANCE FORM

Reference No. (for internal purpose)

Full name:

First name _____

Last name _____

I wish to submit my grievance anonymously

I request not to disclose my identity and contact details without my consent

Contact information

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

By Post: Please provide mailing address:

By telephone: _____

By e-mail: _____

Preferred Language for communication

Belarusian

Russian

Other, please specify _____

Description of Grievance
