



**BLUEING THE BLACK SEA (BBSEA)
GEF REGIONAL PROJECT**

STAKEHOLDER ENGAGEMENT PLAN

FINAL

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LIST OF ABBREVIATIONS

BBSEA	Blueing the Black Sea
BSC	Black Sea Commission
BSEC	Organization of the Black Sea Economic Cooperation
BSEC PERMIS	Permanent International Secretariat of the Organization of the Black Sea Economic Cooperation
BSTDB	Black Sea Trade Development Bank
CBO	Community Based Organization
CMA	Common Maritime Agenda
EIA	Environmental Impact Assessment
ESF	World Bank Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	World Bank Environmental and Social Standards
GC	Governing Council
GEF	Global Environment Facility
KPIs	Key Performance Indicators
LMP	Labor Management Procedure
NGO	Non-Governmental Organization
PIU	Project Implementation Unit
RSC	Regional Steering Committee
SEP	Stakeholder Engagement Plan
SMEs	Small and Medium-sized Enterprises
ToR	Terms of Reference
UNDP	United Nations Development Program
WB	World Bank

1. INTRODUCTION

1.1. Stakeholder Engagement Plan

This document presents the Stakeholder Engagement Plan (SEP) for **Blueing the Black Sea GEF Regional Project** (The Project) that will be implemented by the Permanent International Secretariat of the Organization of the Black Sea Economic Cooperation (BSEC PERMIS), supported by the World Bank (WB) and funded by Global Environment Facility (GEF). The project will take place in four countries: Georgia, Moldova, Türkiye and Ukraine. The exact project locations are not known at the moment. It is expected that the project supported activities will initially start in Türkiye and Georgia, and then in the phase two in Moldova and Ukraine.

In line with ESS10 paragraph 18: “In certain circumstances, depending on the level of information available about the project, the SEP will take the format of a framework approach, outlining general principles and a collaborative strategy to identify stakeholders and plan for an engagement process in accordance with this ESS that will be implemented once the location is known.”, this SEP takes a format of a framework approach. The plan is designed to ensure effective engagement between various stakeholders throughout project lifecycle outlining the following steps that will be the bases of Stakeholder Engagement Plans for each country:

- strategy to identify and map the key stakeholders at national and regional level
- engagement approach for both, project affected parties and other interested parties
- general principles and a collaborative strategy to identify stakeholders
- a plan for an engagement process in accordance with WB ESS10 and Stakeholder Engagement Guidelines of GEF
- principles and guiding procedures for Grievance Mechanism

Country specific Stakeholder Engagement Plans (SEPs) shall be developed based on this SEP as soon as more information about the specific locations, project’s affected people, and schedule of activities is available, and before any activities in the beneficiary countries begin

1.2. Background

The Black Sea is a nearly enclosed and zonally elongated basin that has a limited interaction with the Aegean Sea through the Turkish Straits System. The Black Sea is bordered by Ukraine, Romania, Bulgaria, Türkiye, Georgia, and Russia. It is supplied by a number of major rivers such as Danube, Dnieper, Don, Rioni, Kodori and Inguri Chorokh, Kizilirmak, Yesilirmak, Sakarya, Southern Bug and Dniester. Other than those, many other countries’ watersheds drain into the Black Sea. The Black Sea is highly sensitive to anthropogenic impacts due to the huge catchment area and almost landlocked nature.

The environmental quality of the Black Sea has been declining significantly, with peak nutrient pollution causing eutrophication, plastics, and marine litter. The climate change is likely to exacerbate erosion, flooding, and environmental quality of the Black Sea. The most significant process causing degradation of the Black Sea has been the massive eutrophication by nitrogen and phosphorus compounds, coming largely from agricultural, domestic, and industrial sources. Sewage discharge and oil pollution pose a threat to human health and in some cases hamper the development of sustainable tourism and aquaculture.

Addressing pollution issues will continue to be a major challenge for the sustainable development of the Black Sea in a post-COVID era. Prevention and reduction of water pollution is important for human

health and for healthier natural habitats. Against this background, the World Bank and its partners have engaged into planning a regional approach to respond to the pollution challenge – the **Blueing the Black Sea GEF Regional Project**. It will build on existing analytical works on pollution that will help to identify innovative finance and business models that reduce the degradation of coastal and marine resources, providing strong evidence.

The proposed Project will benefit the Project Focus Countries through capacity building and knowledge exchange. Country level activities are funded by the GEF in Georgia, Moldova, Türkiye and Ukraine¹. Through the proposed interventions, the Project aims at strengthening the commitment of the Governments of the Project Focus Countries to address the issue of marine pollution in a sustainable way. The Project will also establish a platform for collaboration of private sector/SMEs and innovators, thus allowing for piloting innovative pollution prevention/reduction solutions. It is envisaged that these interventions will create an enabling environment for systemic and coordinated actions in the Project Focus Countries and will also contribute to broader long-term regional cooperation through knowledge creation and regional knowledge sharing to combat marine pollution and develop other sectors of the Blue Economy.

1.3. Project Overview

The Project aims to strengthen the capacity and preparedness of governments and the private sector in the Project Focus Countries² to reduce environmental degradation in the Black Sea.

The project has three indicative components.

Component 1. Economic case to Invest in Pollution Prevention and Reduction: Good understanding of the cost of pollution at the national and regional levels are an indispensable basis for further developing the Blue Economy in the region. This component will address the economic knowledge gap in pollution prevention and reduction through an economic analysis. Then, building on the analytical work prepared under *Turning the Tide of Pollution* this component will develop investment recommendations to the governments of the BBSEA GEF Project Focus Countries.

Subcomponent 1.1: National Policy and Institutional Framework. The sub-component would build on the on-going and planned national investments for rural development, wastewater treatment, rivers basin and coastal zone management, as well as current institutional reforms that may present further opportunities for improved coordination. Good policy and governance at the national and regional levels are an indispensable basis for further developing the blue economy in the region. The sub-component will provide an assessment of the current national policy and legal framework and examine the alignment with regional and international instruments (regulations/conventions) on pollution related to water management, agriculture, aquaculture, tourism and shipping. It will provide recommendations for legislative and administrative reforms at national and municipal levels, aligning with regional engagements for improved coordination between sectoral agencies and for pollution control. National level analysis will take place in Türkiye, Georgia and Moldova.

Subcomponent 1.2: National investment recommendations, knowledge exchange and regional dialogue. The sub-component will include development of national investment recommendations for pollution reduction and management in Türkiye, Georgia and Moldova. Building on the findings from the Institutional, Policy and Legal Analysis prepared under *Turning the Tide of Pollution*, the

¹ “Project Focus Countries” means Georgia, the Republic of Moldova, the Republic of Türkiye, and Ukraine.

² “Project Focus Countries” means Georgia, the Republic of Moldova, the Republic of Türkiye, and Ukraine.

sub-component will establish dialogue with the line ministries and ministries in charge of finance as well as key regional stakeholders. Within the framework of relevant regional and international frameworks, the sub-component will then identify the potential infrastructure investment recommendations at pollution hot spots, including investment concept, investment roadmap with baseline data, targets and monitoring mechanism. In parallel, the sub-component will foster knowledge by exchange of best practices. Knowledge products and trainings will be posted on the Black Sea Virtual Knowledge Center³ and disseminated through the IW:LEARN⁴ Platform. 1 % of the IW grant will be dedicated to IW:LEARN activities, including the content uploads to the online website, production of project experience notes, and the participation of the project in IW Biannual conferences. The sub-component will promote regional dialogue between the BSC, BSEC, GFCM and enhance BSEC performance (financing of activities and participation). This subcomponent will also support assessing the pollution impacts and selection⁵ and preparation⁶ of small clean-up activities in Ukraine for specific pollution generated by the ongoing war such as debris and rubble, once the situation permits it.

Component 2. Green and innovative financing. This component will improve the readiness of both the public and private sectors in the four Project Focus Countries and provide them with access to financial investment, innovation and technologies for pollution reduction and management. The component will follow a phased approach, with Türkiye and Georgia being targeted first through the Eco-innovation Challenge, and Moldova in a second phase. Ukraine will undergo specific clean-up interventions to address the pollution impacts of the war (once the situation permits it).

Subcomponent 2.1 Eco-Innovation Challenge. This sub-component will finance and promote innovation⁷ to address the eutrophication issue of the Black Sea that will allow public sector institutions, development partners and potential investors to identify, verify and invest in innovative solutions. The Eco-Innovation Challenge will include two different windows: (i) a

³ <http://www.bsec-bsvkc.org/Forms/BlueingTheBlackSeaProject/> The Black Sea Virtual Knowledge Centre (BSVVC) is a project supported by the European Commission (DG Maritime Affairs and Fisheries) and managed by the Permanent International Secretariat of the Black Sea Economic Cooperation Organization (BSEC PERMIS) for a duration of 24 months. The objective of the BSVVC is to provide a centralized platform for information on the Blue Economy in the Black Sea and to improve synergies between stakeholders and Blue Economy related projects in the region.

⁴ <https://iwlearn.net/> IW:LEARN is the Global Environment Facility's (GEF) International Waters Learning Exchange and Resource Network. The IW:LEARN project was established to strengthen transboundary water management around the globe by collecting and sharing best practices, lessons learned, and innovative solutions to common problems across the GEF International Waters portfolio. It promotes learning among project managers, country officials, implementing agencies, and other partners.

⁵ The selection will be undertaken based on the priorities to be advised by the counterparts in Ukraine, and on the environmental and social screening to make sure only Moderate risk activities are allowed for the financial support within the project scope.

⁶ This will include the development of feasibility studies, economic and financial analysis, detailed design and activity-specific environmental and social impact assessment. The screening process will be carried out in accordance with the provisions of the project ESMF.

⁷ Examples of innovation: (i) phosphorus harvesting: using nutrient recovery technologies, recovers phosphorus at wastewater treatment plant and convert into environmentally friendly fertilizer; (ii) using technology to optimize fertilizer application: sensors for efficient nitrogen use is applied to measure the real-time nitrogen status of crops which leads to decreased fertilizer use, and improved water quality; (iii) Cyclic Metabolic Environment; Magnetite Ballasted Activated Sludge; Aerobic Granular Sludge Process; Ultra-fine bubble diffusers; filtration, separation and aeration on a smaller scale; Struvite etc. Source: Environmental Protection Agency of the United States of America.

region-wide challenge targeting early concept ideas; and (ii) three national challenges (one in Türkiye and Georgia in a first phase, and Moldova in a second phase) to support the pilot implementation of proven concepts and piloted ideas through provision of grants. Thus, selected eco-businesses could receive grants under the National Window. The overall theme of the challenges will be to “unlock the potential of eco-innovation to mitigate the impact of eutrophication in the Black Sea water”.

Subcomponent 2.2 Investments Preparation. The Project will support the preparation of investments through identification and selection of viable solutions and locations. Nutrient pollution from agricultural sector is the most pressing issue at stake in many of the beneficiary countries and financing gaps in green-gray infrastructures to treat the pollution was also confirmed and recognized as investment urgently needed during the series of national consultations. The support will target investments for nutrient pollution treatment, urban wastewater treatment, water depollution, water recycling and reuse. The Project will select at least one potential investment project with the most pressing urgency for the purpose of Blueing the Black Sea to support the preparing of a more concrete project proposal. The selection criteria of the project proposal should be based on: 1. Regional and national impact of investment on pollution reduction, 2. Readiness of the government to borrow for infrastructure investment, 3. Effectiveness in reducing water pollution in the Black Sea, 4. Sustainability of operation and maintenance of the investment, 5. Replicability and scalability of the investment, 6. Social impact on community enhancement, job creation and gender equality. The decision on investment project selection should be made through national and regional consultations with key stakeholders. The preparation envisages to include development of various project preparation steps such as pre-feasibility studies⁸, economic and financial analysis, and initial environmental and social assessment. This sub-component includes consulting services and consultations and will focus on at least one of the Project Focus Countries.

Component 3 - Project Management. This component will aim to ensure the project efficiency and efficacy through the establishment of a satisfactory M&E management system -including for GEF indicators- as well as the maintenance of the project’s participation and consultation mechanisms. This component will support BSEC PERMIS in charge of the technical implementation of the project activities, financial management and procurement, overall monitoring of project results, production of progress reports, and ESF compliance, including the establishment of a culturally appropriate grievance redress mechanism. BBSEA PIU will be housed in the BSEC PERMIS and will be comprised by professional, administrative and support staff. BBSEA PIU will be responsible for the overall coordination of the three components and will inter alia: (a) oversee the preparation of annual operating plans; (b) prepare progress and other reports, as required by the GEF and the World Bank. The Project will deploy consultancy services to support the BSEC PIU in managing the Eco-Innovation Challenge and in meeting the requirements of the relevant ESF standards.

⁸ The preparation will not include feasibility or detailed design level studies nor an environmental and social impact assessment.

2. REGULATIONS AND REQUIREMENTS

The Project would benefit Project Focus Countries through knowledge exchange and standards building, and activities will take place at national level in Georgia, Moldova, Türkiye, and Ukraine. Therefore, at the implementation stage, stakeholder engagement plans will be developed for four countries aligned with the national regulations, World Bank's ESS10 and GEF requirements.

2.1. Overview of Regulations at Country Level

All four project countries have regulations on public participation, consultation, and access to information for their citizens. These are either regulated with the constitutional law; such as access to information, or with the environmental assessment law that secures public consultation and participation particularly for public or private projects that have impact on environment and communities. Below is the summary of national level regulations.

Georgia: The Constitution of Georgia, **Article 37, Part 3** states that “any person has the right to live in a healthy environment, use the natural and cultural environment. Any person is obliged to take care of the natural and cultural environment”; **Article 37, Part 5** states that “an individual has the right to obtain full, unbiased and timely information regarding his working and living environment”; **Article 41, Part 1** states that “a citizen of Georgia is entitled to access information on such citizen as well as official documents available in State Institutions provided it does not contain confidential information of state, professional or commercial importance, in accordance with the applicable legal rules.”

The Environmental Assessment Code of Georgia (**No. 890-IIS of 2017**) was put into force on 7 December 2017 and regulates the implementation of environmental impact assessment (EIA) process, procedures, and studies in Georgia. Public participation is one the requirements of the code.

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

- **Law No.982 / 2000 on Access to Information** regulates interaction between providers of information and individuals, obligations of information providers and safeguarding the right to information.
- **Law No.64 / 2010 on Freedom of Expression** guarantees right to freedom of expression and regulates the balance between right to freedom of expression and defense of private and family life.
- **Law No.239 / 2008 on Transparency in Decision Making** refers to the transparency of information linked with the decision-making process and to the consultation of stakeholders when drafting decisions.
- **Administrative Code of Republic of Moldova** establishes procedure for consideration of petitions of the citizens addressed to the relevant authorities for the purpose of ensuring protection of petitioners' rights and legitimate interests.
- **Law No.86 / 2014 on Environmental Impact Assessment** sets the basis for environmental assessment. Public consultations for the projects which require a full EIA are compulsory at the initial stage of the project before preparing the EIA (at the scoping stage) and at a later stage, when the Statement on EIA is disclosed to the public prior to reviewing the final (updated) documentation by the state environmental authority.
- **Law of the Republic of Moldova on mediation** regulates mediation as an alternative dispute resolution amicably mediator and mediation process status.

Türkiye: Türkiye has the following legislation related to citizen/stakeholder engagement which covers right to access information, right to petition, and participation in policy development and decision-making.

- **Right to Petition (Constitution Article 74)** is a constitutional right that citizens and foreigners residing in Türkiye have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye regarding the requests and complaints concerning themselves or the public.
- **Law on the Right to Information (Articles 11)** regulates that everyone has the right to information and the institutions and agencies shall provide the requested information within 15 working days.
- **The Environmental Impact Assessment Regulation No. 29186 (Article 9)** requires that community engagement meetings should be held to inform communities and stakeholders on the project and receive their input and feedbacks.
- **Right to Constitutional Complaint (Constitution, Article 148):** Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities.

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

- **Access to Information Legislation, Guidelines and Practices:** The Constitution of Ukraine Article 34 guarantees the right to access for information for Ukrainian citizens. The Law #2939 ‘On Access to Public Information’, #2657 ‘On Information’, and #183 ‘About state secret’ provide the regulatory framework for access to various types of public information. Law #2939 ‘On Access to Public Information’ states that information held by public authorities cannot be restricted, unless it is categorized as confidential, secret, or for internal use only.
- **Ukrainian Citizen Engagement Legislation:** Regulation #996 ‘On the Procedure for Consulting the General Public on Establishing and Implementing the Public Policy’ specifies the form and methods for public consultations and distinguishes between direct consultations, such as conferences, meetings, seminars, web conferences, and indirect forms, such as public surveys. Regulation #234 specific procedures for conducting surveys and opinion polls by government executive bodies with the involvement of the local council.
- **Ukrainian Complaints Mechanisms:** Law #393 ‘On Citizens’ Appeal’ defines (Article 3, paragraph 4) and regulates (Articles 16-19) the application of complaints mechanisms. Both national and local authorities are obliged to objectively consider citizens’ complaints, to compensate citizens for any breach of their rights and to provide justification for any decision taken in the examination of complaints.

2.2. World Bank and GEF’s Requirements for Stakeholder Engagement

World Bank	GEF
The World Bank’s Environmental and Social Framework (ESF)’s Environmental and Social Standard (ESS) 10 “Stakeholder Engagement and Information Disclosure”, recognizes ‘the importance of open and transparent engagement between the Borrower and project	GEF funded projects are required to meet best international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the GEF Policy on Public Involvement in GEF Projects. The project stakeholder engagement activities should be robust and enough disclosure on

<p>stakeholders as an essential element of good international practice’.</p>	<p>information should be made to promote better awareness and understanding of its strategies, policies, and operations.</p>
<p style="text-align: center;">Requirements</p>	
<ul style="list-style-type: none"> - Identify stakeholders that are affected by, interested to project and vulnerable groups, - Develop a stakeholder engagement plan involving (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding grievances; and (vi) reporting to stakeholders, - Engage with stakeholders throughout the project cycle, - Provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, - Disclose Stakeholder Engagement Plan and seek for stakeholder view, - Propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. 	<ul style="list-style-type: none"> - Identify people or communities that are or could be affected by the project as well as other interested parties, - Plan an on-going process taking place during the project life and develop a stakeholder engagement plan, - Ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them, through a process of information disclosure and meaningful consultation, - Maintain a constructive relationship with stakeholders on an on-going basis through meaningful engagement during project implementation.

Stakeholder engagement plans will be prepared aligned with this framework meeting the requirements of World Bank and GEF in the absence of national regulations.

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

During project preparation BSEC PERMIS engaged with key stakeholders in a number of consultation meetings which informed the project design. The section below presents main stakeholder engagement activities during preparation phase::

- 1- National level consultation meetings in project preparation phase
- 2- Stakeholder consultation on Environmental and Social Framework

National Level Consultation Meetings:

During the *preparation phase* of the Project, BSEC PERMIS carried out 6 national level consultation workshops with the stakeholders from the signatory countries of Common Maritime Agenda. The national consultations were held in Georgia, Moldova, Türkiye, Ukraine, Romania, and Bulgaria. The meetings were announced on the events page of World Bank country websites and organized via Facebook and Zoom where translation was provided in countries' official languages.

The workshop was designed in two working sessions where stakeholders discuss the sources, impacts and prevention efforts related to marine pollution as well as country specific pollution challenges which feed the design of the Project. The workshop ultimately created an open platform for the stakeholders to discuss how to develop a joint and coordinated solution against the pollution in Black Sea.

Consultation workshop documents, presentations and meeting notes are published on [BSEC website](#)⁹.

Country	Date of meeting
Türkiye	4 February 2021
Georgia	25 February 2021
Ukraine	11 March 2021
Moldova	22 March 2021
Bulgaria	29 March 2021
Romania	22 April 2021

Representatives from more than 130 stakeholders participated the national consultation meetings. A key part of the consultation meetings was gathering information from participants who included experts, academics, government officials, representatives from municipalities, and businesses. During the meetings, feedbacks received from participants to identify the sources, impacts, and prevention efforts (information and institutional gaps) related to marine pollution in the region, as well as the key pollution challenges in each country. The findings will feed into an in-country pollution diagnostic paper for each country, which, in turn, will inform the Project architecture and the creation of an effective national and regional diagnostic tool. National consultation meetings organised in all Black Sea littoral states to seek:

- input from respective stakeholder communities on marine pollution, pressing issues and priorities related to pollution prevention, reduction, and control in the Black Sea, and opportunities to inform the planned 'Blueing the Black Sea' (BBSEA) program architecture and implementation modalities,
- information to support a national and regional pollution diagnostic tool that will form the baseline for further action.

Common feedbacks received from participants:

- General support to the work on the diagnostic of the state of play and issues at stake regarding marine pollution in the Black Sea.
- General agreement from participants that diagnostic activities reflect on the main gaps that need to be addressed.

⁹ <http://www.bsec-bsvkc.org/Forms/BlueingTheBlackSeaProject>

- General feedback received on regulation needs on legislation for pollution prevention, capacity building to business entrepreneurs, and need for more investment by bank or development institutions.
- Developing guidelines for key sectors in the region such as agriculture, industry, marine, and shipping is one of the feedbacks received from participants.
- There is high interest in the preparation of an investment plan on marine pollution and circular economy at the national level. Participants state the need for a circular economy plan at the national level, innovation towards pollution reduction and the need for the development of guidelines in key sectors.
- Investment preparation, investment planning, and Eco-Innovation Challenge received interest from participants.
- The feedback received from all countries' participants that the collaboration with institutions at the regional level is important. National hubs are created in each 7 CMA countries to increase coordination and dialogue between stakeholders to provide information and experience exchange.
- The participants indicated that NGOs participation and engagement under Eco-Innovation Challenge, as well as encouraging youth participation in the project is essential.

Topics that will feed the design of the project:

- Promoting eco-sustainable business practices and innovation,
- Embedding information exchange/management in the project components and setting smart goals and targets.

Stakeholder Consultations on Environmental and Social Framework:

BSEC disclosed draft ESMF, SEP, LMP and ESCP in English and official languages of Project participating countries on its website, on October 11, 2021. Stakeholder consultation meeting on the ESF documents was held on October 27, 2021 in virtual format and was well attended by 85 people at the peak from the public, private, academia, and civil society sectors participating. A complete stakeholder list of institutions represented is provided in Annex 2.

The aim of the webinar was to consult on the anticipated environmental and social aspects of the Project with all interested stakeholders focusing on the investment component of the planned BBSEA Project and expected positive and potential negative impacts and risks, requirements of the World Bank Environmental and Social Standards (ESS) and the tools and mechanisms to address the environmental and social risks and impacts. Detailed report on the consultation meeting is provided in the Annex 3.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1. Stakeholder Identification

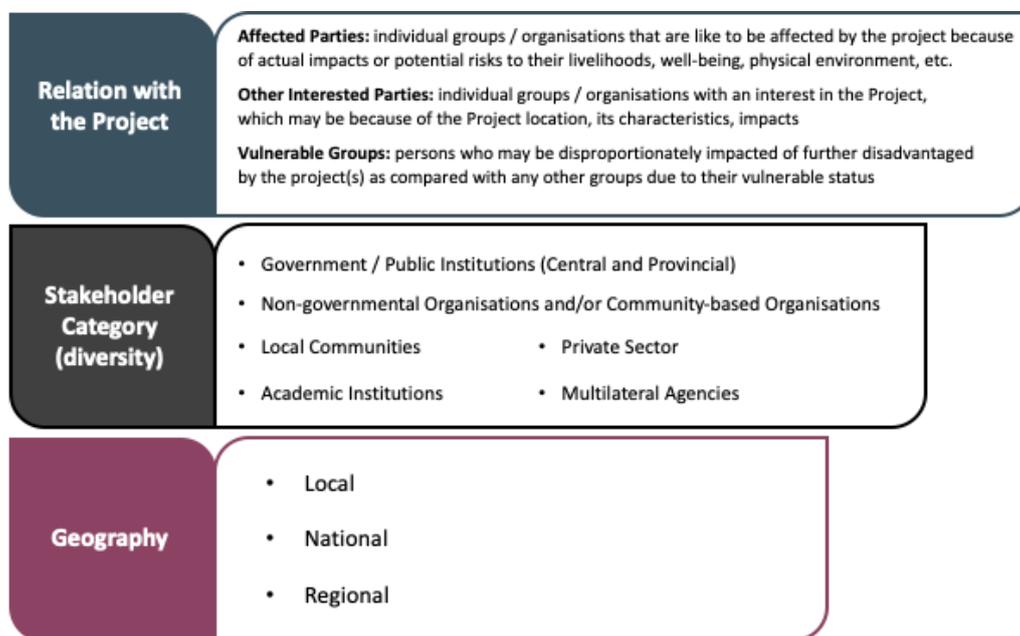
Stakeholders are defined as individuals or groups who are ***affected or likely to be affected by the project*** and who ***have an interest in the project***.

At the preparation phase of the project, BSEC PERMIS identified its initial key stakeholders among related governmental institutions, local authorities, universities, national and regional NGOs and international organizations, and held national level consultation workshops with the participation from these stakeholder groups (Please see Annex 1 for the participants list).

Considering the project’s regionality and scope, the stakeholder list will be enhanced for the implementation period. The Project has three two main tools for implementation which targets and has an impact on different stakeholder groups:

- 1- Analysis and policy/plan development
- 2- Awareness raising and trainings
- 3- Eco-Innovation Challenge

Based on this, the Project applies three pillar categorizations in identifying the stakeholders that will lead to an inclusive stakeholder engagement process.



While developing the country specific stakeholder engagement plans, the beneficiary countries will list all relevant stakeholders that are affected by and have an interest to project activities ensuring that careful screening has been conducted to involve stakeholders from different categories, particularly from NGOs and communities. Below table summarizes the stakeholder groups that will be base for the country specific stakeholder identification. This list is not exhaustive and will be expanded based on specific context in each country. Country specific SEPs to be prepared during project implementation will carry out country specific stakeholder identification and mapping, which will take into account relevant local context and the nature of sub-projects to be supported in the country. The table below presents a preliminary list of identified stakeholders.

Stakeholder	Relation w/project	Stakeholder category	Geography	Relevance to project
Communities	affected	community	local	<ul style="list-style-type: none"> • National plans will have impact on their livelihoods and/or socio-cultural practices.
Farmers (agricultural production and animal husbandry)				
Fishermen (Including livelihoods mainly depend on sea-related activities)				
Women headed households				

Women entrepreneurs				<ul style="list-style-type: none"> Grant projects may have impact on their livelihood and/or socio-cultural practices.
Migrant workers				
Refugees				
Internally displaced persons				
Workers in specific sectors affected by pollution				
Persons with disabilities				
Elders				
Ethnic minorities				
Youth, young entrepreneurs				
Children				
<i>Please add stakeholders related to this category.</i>				
Local NGOs / CBOs	affected	NGO / CBO	local	<ul style="list-style-type: none"> National plans will have impact on their members' livelihoods. Target groups for workshops, pilot projects.
Local business associations (in agriculture, aquaculture, tourism, and shipping)				
Agricultural development cooperatives				
Fisheries / aquaculture cooperatives				
Tourism cooperatives				
Shipping				
<i>Please add stakeholders related to this category.</i>				
Public institutions / agencies	affected	Public institution	national	<ul style="list-style-type: none"> Input provider to national plans Implementor of national plans
Ministries on environment				
Ministries on agriculture, tourism, shipping				
National agencies on innovation, technology, SME development				
<i>Please add stakeholders related to this category.</i>				
National NGOs	affected / interested	NGO	national	<ul style="list-style-type: none"> National plans will have impact on their members' livelihoods. Input providers of national plans.
National level business associations				
NGOs / Business associations working on innovation and sustainability				
NGOs working on agriculture, aquaculture, tourism, shipping, water management				
<i>Please add stakeholders related to this category.</i>				
Enterprises / Industries	affected	Private sector	local / national	<ul style="list-style-type: none"> National plans will have impact on them and their members. Target groups for workshops, pilot projects. Eco-Innovation Challenge applicants
Chamber of commerce				
SMEs working on agriculture, aquaculture, shipping, fisheries, innovation, and technology				
<i>Please add stakeholders related to this category.</i>				
Academia / Universities	interested	Academic institutions	national	<ul style="list-style-type: none"> Input providers of national plans
<i>Please add stakeholders related to this category.</i>				
Development Agencies	interested		national	<ul style="list-style-type: none"> National plans will impact their investment strategies.
Regional Development Agencies in Türkiye for Black Sea region				
Regional Development Agency in Moldova				

National Association of Regional Development Agencies (NARDA) Ukraine				
<i>Please add stakeholders related to this category.</i>				
Municipalities	affected	local authorities	local	<ul style="list-style-type: none"> • Input provider and co-implementor to national plans • Can be a grantee
Municipalities in Black Sea region of each country				
International organizations	interested		International	<ul style="list-style-type: none"> • Input providers of national and regional plans. • Knowledge and experience exchange
General Fisheries Commission for Mediterranean (GFCM)				
Black Sea Commission standing for the Commission on the Protection of the Black Sea Against Pollution - BSC				
The Black Sea Trade and Development Bank (BSTDB)				
BSEC Business Council				
European Commission				
UNDP				
<i>Please add stakeholders related to this category.</i>				
International organizations	interested		international	Financier
GEF				
<i>Please add stakeholders related to this category.</i>				
International NGOs	interested	NGO	international	<ul style="list-style-type: none"> • Input providers of regional plans.
International business institutions (Plastics Europe)				
<i>Please add stakeholders related to this category.</i>				

4.2. Stakeholder Analysis and Mapping

Stakeholder analysis is the process of examining identified stakeholders relatively according to the **impact** that the project will have either negatively or positively on their livelihoods, social and cultural practices, the **influence** that they may have on the project, the **interest** that shows their expectations and concerns related to the project and finally their **position**. The Project will use below table for stakeholder analysis at regional and country level.

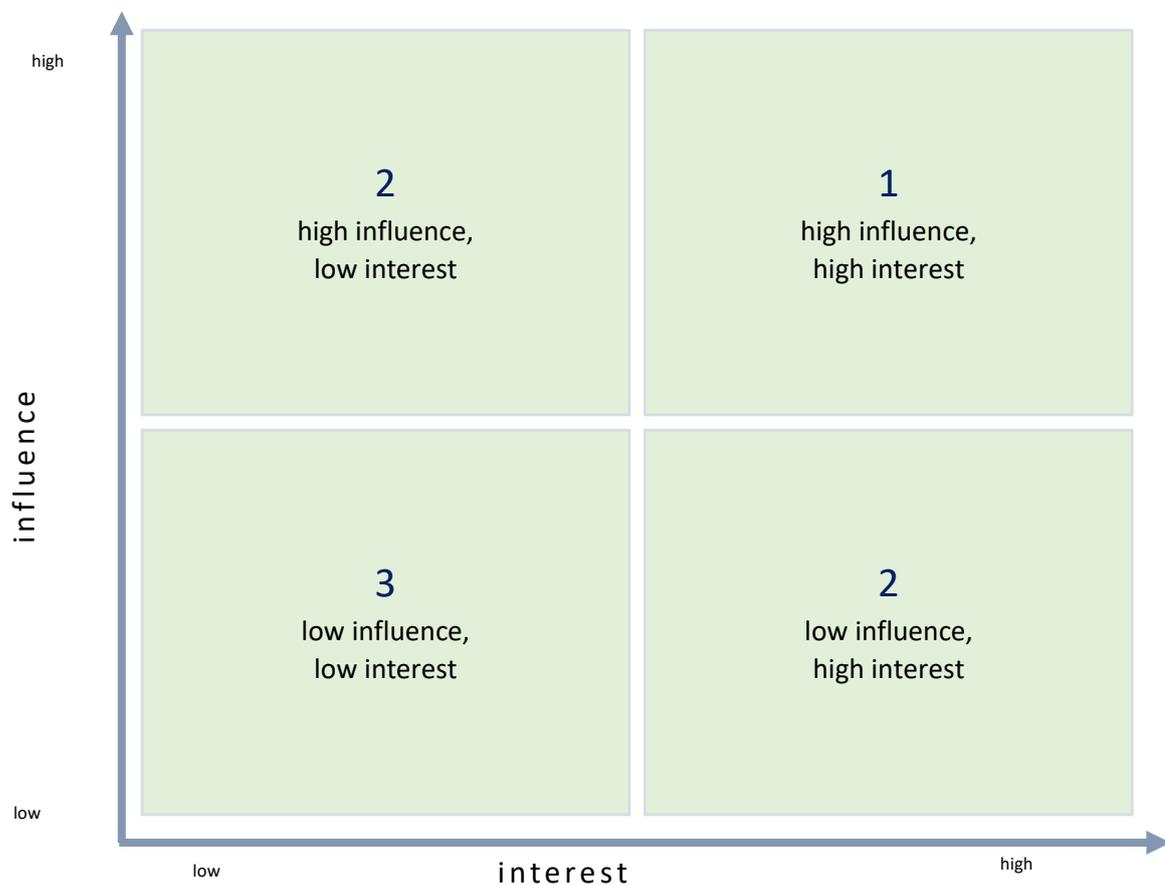
Stakeholder category	Stakeholder	Impact/Interest level (high/ low)	Influence level (high/ low)	Expectation / Concern	Position
Communities	Farmers, fishermen, Women headed households, women entrepreneurs, migrant workers, refugees, internally displaced persons, persons with disabilities, elders, ethnic minorities, workers in specific sectors affected by pollution, youth, etc.				
NGO / CBO	Local NGOs/CBOs (business associations, etc.)				
	National business associations				
	NGOs on innovation, technology, sustainability NGOs working on agriculture, aquaculture, tourism, shipping, water management				
Public institutions	Ministries on environment				
	Ministries on agriculture, shipping, etc.				
Public agencies	National Agencies on SMEs				
	National Agencies on innovation, technology, sustainability				
	Regional Development Agencies				
Local authorities	Municipalities				
Academia	Universities				
	Research centers				
Private sector	SMEs				
Financial/ Investment organizations	National Banks				
	The Black Sea Trade and Development Bank (BSTDB)				
	BSEC Business Council				
International organizations / Multilaterals	European Commission				
	UNDP				
	GEF				
	Black Sea Commission standing for the Commission on the Protection of the Black Sea Against Pollution – BSC				
	General Fisheries Commission for Mediterranean (GFCM)				
	International business institutions (Plastics Europe)				

Following this analysis, impact-influence grid will be used for mapping the stakeholders of the Project. According to impact-influence levelling, the stakeholders will be placed on the matrix. The ones in box#1 are the primary stakeholders, boxes#2 are secondary stakeholders and box#3 is tertiary stakeholders. This will help identify the level and cadence of engagement activity with the stakeholders (Please see Stakeholder Mapping Diagram below).

The beneficiary country will hold a workshop for the identification and analysis of regional, national, and local stakeholders when more information is available on the project. As a result of this study, the beneficiary country will finalize the stakeholder engagement plan detailing the engagement methods, tools and timing for each stakeholder group.

Similar stakeholder analysis and mapping approach will be incorporated in application documents of Eco-Innovation Challenge and Grants. Applicants will be requested to submit a stakeholder engagement plan along with their project proposal.

Stakeholder mapping diagram



4.3. Stakeholders at Preparation Phase

At this stage of the Project, the stakeholders are identified from national, regional, and international institutions as listed in below table. Considering the plan and policy development component of the project, careful screening of NGOs, CBOs, chambers/unions, scientific institutions working on agriculture, tourism, shipping, aquaculture, and water management from international / regional, national, and local level will be conducted.

Stakeholder	Relation w/project	Stakeholder category	Geography	Relevance to project
Ministry of Environmental Protection and Agriculture of Georgia	affected / interested	government institution	national	<ul style="list-style-type: none"> • Input providers of national and regional plans. • Implementor of national plans.
Ministry of Agriculture, Regional Development and Environment in Moldova	affected / interested	government institution	national	
Ministry of Environment and Urbanization in Türkiye	affected / interested	government institution	national	
Ministry of Agriculture and Forestry in Türkiye	affected / interested	government institution	national	
Ministry of Ecology and Natural Resources in Ukraine	affected / interested	government institution	national	
General Fisheries Commission for Mediterranean (GFCM)	interested	international organization	regional	<ul style="list-style-type: none"> • Input providers of national and regional plans.
Black Sea Commission standing for the Commission on the Protection of the Black Sea Against Pollution - BSC	interested	international organization	regional	<ul style="list-style-type: none"> • Input providers of national and regional plans.
The Black Sea Trade and Development Bank (BSTDB)	affected / interested	international organization	regional	Input provider and implementer of pollution reduction and prevention investment guidelines
BSEC Business Council	affected / interested	international organization	regional	Input provider and implementer of pollution reduction and prevention investment guidelines
GEF	interested	international organization	international	Financier
UNDP	interested	international organization	international	Exchange of information and experience, best practices.
European Commission	interested	international organization	international	Exchange of information and experience, best practices.
Plastics Europe	interested	NGO	International	Input provider of regional plans.

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1. The Goal of the Stakeholder Engagement Program

The ownership of the project by the key stakeholders is vital for the successful implementation of the Project. The stakeholder engagement program has been designed to ensure that;

- the project has effective engagement mechanisms to receive feedbacks, inputs and/or concerns of different stakeholder groups,
- the ownership of the project by stakeholders is sustained.

The Project Implementation Unit (PIU) will carry out engagement activities at local, national, and regional level using various methods depending on the characteristics of the stakeholder group in all project phases; preparation, implementation, monitoring and close-out; throughout the project lifecycle.

BSEC PERMIS attaches great importance to documentation of interactions with the stakeholders. The Project will use a *stakeholder engagement log* to record and track the interactions. The log is a living tool and needs to be reviewed and updated when a new stakeholder is introduced, when there is change in any stakeholder's position or after each engagement activity. PIU will use this log as a monitoring tool to track and record the changes in stakeholders' position and the concern mitigated. It will directly support project monitoring and reporting.

Enhanced regional dialogue and collaboration is one of the key desired outcomes of the project. BSEC PERMIS will establish three bodies consisting of national and international level key stakeholders at the beginning of project implementation. Besides their role in project governance, these bodies will also serve for engagement of key stakeholders from national, regional and international level. They will enable timely and continuous information sharing to and from these key stakeholders, such as project update, best practices. PIU will provide a brief project progress update at the beginning of these meetings having a separate section on stakeholder engagement performance.

- **Regional Steering Committee:** The RSC will be comprised of representatives of the relevant national ministries providing policy level and strategic guidance.
- **Governing Council:** It will involve BSEC and national agencies. The national agencies include the Ministry of Environmental Protection and Agriculture of Georgia, Ministry of Agriculture, Regional Development and Environment in Moldova, the Ministry of Environment and Urbanization and the Ministry of Agriculture and Forestry in Türkiye and the Ministry of Energy and Environment Protection in Ukraine.
- **Consultative committee:** World Bank, BSC, UNDP, European Commission; business organisations (plastic Europe for example); Bank(s) (BSTD); BBSEA Special Envoy.

5.2. Principles in Stakeholder Engagement

The stakeholder engagement processes for the Project will be based on the following key principles. These principles will enable PIU to build open, constructive, inclusive, and respectful dialogue as well as a working relationship with all relevant stakeholders.

- **Purposeful Plan:** Design and follow a plan for an effective engagement.
- **Consistency and Coherency:** Ensure that engagement activities are consistent and coherent throughout the project lifecycle.

- **Meaningful Information:** Disclose meaningful information to the stakeholders to allow for active and informed engagement.
- **Inclusive:** Identify all relevant stakeholders, their level of influence and how they are affected by the project and make it easy for them to engage.
- **Multichannel:** Identify various channels, tools and materials that are culturally applicable and accessible by all different stakeholder groups.
- **Timely:** Involve relevant stakeholders from the start and agree on when and how to engage.
- **Subsidiarity:** Engage participant not only via online mechanisms but reach them in as local as possible.
- **Transparent:** Promote a culture of transparency and information sharing with stakeholders and communicate how their input will inform the project.
- **Respectful:** Acknowledge and respect the expertise, perspective, knowledge, and the needs of stakeholders and promote a culture of mutual learning.

5.3. Proposed Strategy for Information Disclosure

The Project has following information to be disclosed to the stakeholders in various phases.

- Project summary and documents
- Environmental and social documents: ESMF, SEP, LMP
- Grievance Redness Mechanisms
- Eco-Innovation Challenge announcement, application procedure, evaluation results
- Grant announcement, application procedure, evaluation results
- Project progress updates
- Project outputs: cost of inaction analysis, national plans, etc.

Written materials will be produced. The content, format and language of the documents will be adapted according to the stakeholder groups' needs.

With the start of the project, a virtual open day event in each country with the participation of project team and experts will be organized for the stakeholders. This will create platform for stakeholders to ask questions about the project, meet with project team and other stakeholders. This will also help the Project enrich the stakeholder group as well as serving to project visibility. PIU will organize annual national and international open day events either virtually or face-to-face depending on the Covid-19 restrictions.

Project outputs such as inaction analysis report, national plans, announcements and results of Eco-Innovation Challenge and grant scheme are also considered among the information to be disclosed to stakeholders.

The timing and methods of the disclosure may vary for each stakeholder group. Below table summarizes main disclosure activities according to project phase. This will be detailed in country specific stakeholder engagement plans.

Project stage	Information to be disclosed	Stakeholder groups	Methods proposed	Timing
Design and Preparation	<ul style="list-style-type: none"> • Project Summary • Environment and social documents (ESMF, SEP, LMP) 	Ministries Local authorities National / international NGOs	<ul style="list-style-type: none"> • Official correspondence • E-mail • BSEC Virtual knowledge Website 	By end 2021

	<ul style="list-style-type: none"> Grievance mechanism's availability 	Regional organizations International organizations	<ul style="list-style-type: none"> Video conferencing meetings Virtual disclosure meetings 	
Implementation	<ul style="list-style-type: none"> Project summary Project Appraisal Document E&S documents Grievance mechanism and GRM reports Project progress updates Trainings, workshops Eco-Innovation Challenge announcement, application procedure, results Grant announcement, application procedure, results Project outputs: Cost of Inaction Analysis, national plans, investment guidelines 	Ministries Local authorities National / international NGOs Regional organizations International organizations Communities Local NGOs / CBOs National and local enterprises Universities Scientific institutions	<ul style="list-style-type: none"> Committee meetings Video conferencing meetings Face-to-face meetings with local authorities and local organizations Radio, TV, newspaper and social media announcements Workshops Virtual open day event Websites and social media accounts of BSEC Focus group meetings with vulnerable groups 	Throughout the project implementation
Close-out	<ul style="list-style-type: none"> Project progress and final report Project outcomes 	All stakeholders	<ul style="list-style-type: none"> Press Releases Website announcements Email Closure event 	During last three months of project implementation

The Project recognizes the cultural, socio-economic, language and educational differences among stakeholders in the project area. The Project will ensure that depending on the stakeholder group, relevant information in relevant language will be prepared and provided. The key documents and types of interactions with such stakeholders that require translation will be identified in SEP preparation for each country.

All disclosure documents as well as project output documents will be published on BSEC Virtual Knowledge website: <http://www.bsec-bsvkc.org/Forms/BlueingTheBlackSeaProject>

PIU will inform all stakeholders how they can reach the documents and share the website information.

Taking into consideration the evolving COVID-19 pandemic situation, and periodic restrictions imposed by the national governments, such as restrictions on public gatherings, meetings and people's movement, the alternative ways will be considered to manage consultations and stakeholder engagement in accordance with the local laws, policies, and physical distancing norms in effect to mitigate the virus transmission. The project shall select methods for stakeholder engagement that are appropriate to the local epidemiological situation.

These alternate approaches for stakeholder engagement will include: reasonable efforts to conduct meetings through online channels (e.g. webex, zoom, skype, etc.); diversified means of communication and relying more on social media, chat groups, dedicated online platforms & mobile Apps (e.g. Facebook, Twitter, Instagram, Viber, WhatsApp groups, project weblinks/websites etc.).

Depending on the Covid-19 precautions at country level, PIU may consider holding face-to-face meetings with local authorities and local key stakeholders such as fisheries/aquaculture cooperatives, agricultural development cooperatives, tourism organizations, etc. to introduce them the project, its content, consultation process as well as to update them on the project progress periodically. If such meetings are not possible, alternative virtual means will be used.

Eco-Innovation Challenge and grants is one of the main components of the Project. PIU will ensure that the call for proposal announcement is public and accessible to all interested parties using relevant communication channels including media, newspaper, social media, local and national networks of potential applicants and interested parties. PIU will also consider holding local and national level information meetings to introduce the programs, application procedure as well as evaluation criteria. Local level engagements are important for encouraging applications from local organizations.

All information about the Eco-Innovation Challenge and grants will be published on BSEC Virtual Knowledge Center. The website will have a specific section for “questions and answers” about the application process. Applicants can ask question about the application and evaluation process via email or via an interface on the BSEC Virtual Knowledge Center. All questions received and answered will be published on the website. Depending on the questions, PIU will also consider online clarification meetings.

The Project will inform the applicants of Eco-Innovation Challenge and grant scheme in writing about the result of their application. The results will also be published on BSEC Virtual Knowledge Center.

PIU aims to follow a participatory and transparent evaluation process for Eco-Innovation Challenge and grants. This may include setting evaluation criteria with key stakeholders or forming an evaluation committee consisting of representatives from national, regional, and international stakeholders.

5.4. Strategy for Consultation

The Project has wide range of topics and documents that require stakeholder consultation. In the preparation phase, project scope and E&S documents will be shared with stakeholders for their feedback and input. The project will use various methods such as virtual meetings, one-to-one interviews, surveys and focus groups meetings at this stage.

Having a plan/policy development component, the Project can be considered as a macro level work that will have impacts on communities and their livelihoods when the plans/ policies are executed. So, participatory needs analysis and plan development is vital for the project success.

PIU will ensure that representation from affected communities particularly from producers, fishermen, people from rural tourism and shipping as well as vulnerable groups is maintained first at national level and, when the scope is detailed, at local level. This engagement will be through national level organizations of these groups such as chambers, unions and then through local level organizations depending on each country. National agencies will have a critical role in this process. PIU will provide technical support to national agencies considering their resources and capacity.

5.5. Strategy to Incorporate the View of Vulnerable Groups

Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance to do so.

Considering the regionality of the project and its policy/plan development component, local stakeholders, such as local NGOs and local communities shall be considered among vulnerable groups. This may include -but not limited to – following:

- households whose livelihoods mainly depend on sea-related activities such as fishing,
- women headed households,
- migrant workers,
- refugees,
- internally displaced persons,
- workers in specific sectors affected by pollution,
- persons with disabilities,
- elders,
- ethnic minorities,
- youth,
- children, etc.

Considering Eco-Innovation Challenge and grants component, SMEs at local level, women-owned SMEs and youth entrepreneurs are among the stakeholders that requires specific measure to inform and engage them to project activities.

The country specific SEPs will identify any other vulnerable groups and the need to differentiated approach to certain groups.

The Project will adopt a pro-active approach in involving vulnerable groups to project activities, which starts with careful screening of stakeholders from local level. PIU will ensure that local business associations and local NGOs are included in country specific stakeholder engagement plans, and additional engagement tools such as focus group meetings, face-to-face interviews are described for the individuals who are not represented via these organizations.

6. ROLES, RESPONSIBILITIES, & RESOURCES FOR STAKEHOLDER ENGAGEMENT

BSEC PERMIS will establish a project team consisting of one project manager from BSEC staff and 9 staff to be hired specifically for this project, which will serve as the project implementation unit (PIU).

PIU is responsible for the implementation of the stakeholder engagement program and project’s Grievance Redness Mechanism.

Regional Steering Committee (RSC) and Governing Councils (GC) will have a monitoring role over the implementation. PIU, RSC and GC will discuss and set key performance indicators for stakeholder engagement program and grievance mechanism.

The budget for execution of the stakeholder engagement plan will be planned for software development, engagement activities with different stakeholders, communication and visibility materials and events. Estimated budget for overall SEP activities is \$219.500. The budget breakdown is presented below.

Activity	unit	# of unit	Unit cost (USD)	Total cost (USD)
Events & Meetings				
Subscription to digital platforms for virtual open day and other virtual stakeholder gatherings	per year	4	\$500	\$2.000

Annual national and local stakeholder engagement events	per event	12	\$3.500	\$42.000
Stakeholders' monitoring visits to grant projects	per visit	8	\$5.000	\$40.000
Project closure event (4 national level)	per event	4	\$10.000	\$40.000
Design and print				
Communication materials (infographics, visuals, posters, leaflets, etc.)	lump sum	1	\$10.000	\$10.000
Materials for grievance mechanism (incl. grievance form)	lump sum	1	\$2.500	\$2.500
Services				
Translation of comms materials and E&S documents	per country	4	\$3.000	\$12.000
Stakeholder engagement software	per service	1	\$20.000	\$20.000
Third-party monitoring for stakeholder engagement performance	per service	1	\$28.000	\$28.000
Trainings to project staff, key stakeholders and contractors/grantees on grievance mechanism	per training	4	\$2.000	\$8.000
Contingencies				\$15.000
Total				\$219.500

Grant projects which may have high interaction frequency with communities and social, economic, cultural, and environmental impact at local and national level and last more than six months should have at least one Community Liaison Officer who will be responsible for the implementation of the stakeholder engagement plan and reporting to PIU periodically.

Country specific SEPs shall be prepared, disclosed and consulted upon before project activities in beneficiary countries begin. BSEC shall be responsible for the preparation of the country specific SEPs.

7. GRIEVANCE MECHANISM

Considering the project scope, PIU expects feedbacks rather than grievance related to the activities under Component 1. A well-structured disclosure and consultation plan is critical for this component of the project.

The project will establish an open and respectful dialogue with all stakeholders, and welcome feedbacks from community members, NGOs, businesses, government and industry groups and other stakeholders. Feedbacks may include questions, comments, requests for information, suggestions, concerns, and complaints. All feedbacks will be documented and responded back. Some feedbacks may identify a complaint. In that case, PIU will initiate the grievance procedure.

Grievances are more likely to occur during the implementation of the second component of the project, where trainings, awareness raising campaigns are held, grant projects are funded and kicked-

off for implementation. PIU will develop and implement a grievance mechanism with the implementation of the project. The grievance mechanism will be introduced to all stakeholders including Grantees and the stakeholders of the grant projects.

The Purpose

The Project will have a transparent and unbiased grievance mechanism to:

- identify issues and concerns as early as possible to address them timely and proactively
- continuously improve Project performance
- demonstrate Project's commitment to meaningful stakeholder engagement, and respect for stakeholders' opinions and concerns.

The Principles

The project will have a grievance procedure based on following key principles:

- Any person or organisation can express concerns, complaints, and grievances at any time, without fear of retribution and retaliation.
- All grievances will be treated in a fair and respectful manner.
- When a grievance is received, PIU will respond to the stakeholder to confirm its receipt within five (5) business days. At this time, the stakeholder will also be provided information about response times, next steps, and a contact within the team. The grievances shall be resolved within 30 calendar days.
- The process (receive, investigate and resolve) will be consistent and transparent.
- Information about a grievance (and related investigations and decisions) will be documented.
- Personal information about the affected stakeholders will be treated as confidential. PIU will respect other confidentiality requests as needed. Submission of anonymous grievances shall be allowed. The grievance mechanism will also receive complaints related to sexual harassment and sexual exploitation and abuse.
- Grievances related to project activities, project management, PIU activities or contractor including grantee's activities can be submitted through grievance mechanism.
- Affected stakeholders may choose to pursue World Bank's Grievance Redress Mechanism and / or external remedies at any time.

Recording, Tracking and Monitoring

As grievance is part of stakeholder engagement, the Project will have an interface for grievances as well as feedbacks in stakeholder engagement software. It will help systematic management of the grievances according to response times. World Bank, GEF and Regional Steering Committee will have access to software where they can see statistics and performance of grievance management.

All project staff including grantees will have an awareness session on *grievance mechanism*. It is critical for project staff to perceive that grievance mechanism is one of the strong tools to receive stakeholders' feedbacks and concerns in order to manage and mitigate any impact of the project. The Project will set specific key performance indicators (KPIs) for grievance management performance.

The Process

The grievance mechanism will be introduced to all stakeholders explaining what it is for, who it is for, which principles will be followed, how a stakeholder raise a concern/complaint, and how the concern/complaint will be managed (the stages). It will clearly be introduced to the stakeholders of grant projects.

The grievance forms will be published online, and also printed and distributed to local stakeholders, where necessary. The forms will be in 6 languages: English, Georgian, Moldovan, Turkish, Ukrainian, and Russian.

Grievances will be managed in five stages.



Stage 1 - Feedback received: Stakeholders can convey their feedbacks related to the Project in many ways; verbally during a meeting, via website, email, call or official correspondence etc. In either way, PIU will ensure that it is documented, incorporated, and responded to as needed. In some cases, this process may identify a grievance. If so, Stage 2 is initiated. *PIU will response the enquiries in five (5) business days.*

Stage 2 - Grievance logged: When a grievance is identified, it is officially registered and given a unique identification number. It is categorised based on the type of complaint and its severity. An initial response is sent to the person(s) who raised the grievance, acknowledging their feedback and describing the next steps in the grievance process, time estimates for these steps and a contact person.

Stage 3 - Investigation and resolution: PIU will investigate grievances and their surrounding circumstances. These investigations will be undertaken in a timely manner. The results of these investigations will be reviewed, and a resolution will be proposed. The development of the resolution may involve consultation with the person(s) involved and in some cases with an independent third party. The proposed resolution will then be formally communicated to all parties. *PIU will complete the process and respond to the complainant in 30 calendar days.*

Stage 4 - Resolution: If the resolution is accepted by all parties, it is implemented, and the grievance is closed. If the resolution is not accepted, it will be reconsidered, and a revised resolution may be proposed. The affected person(s) may choose to pursue external remedies at any time, including if an agreed resolution cannot be found.

Stage 5 - Monitoring & Evaluation: After the resolution has been implemented, it will be monitored, and its effectiveness will be evaluated. All parties will be notified that the resolution has been implemented and will have the opportunity to provide feedback on the grievance process and its implementation.

World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether

harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

8. MONITORING AND REPORTING

8.1. Involvement of Stakeholders in Monitoring Activities

Tracking and monitoring methods as well as tools will be discussed with key stakeholders. How to track progress, collect and analyse the data will be discussed and agreed in committee meetings. KPIs for project performance and stakeholder engagement will also be set together with key stakeholders who are the members of regional steering committee and governing council.

PIU will establish a group consisting of community members, NGO representatives, academics, experts from municipalities and ministries for the monitoring of grant projects. Each group will identify and set the scope, criteria, and timing of the monitoring study. Grant monitoring will include face-to-face meetings with affected groups of each grant project.

Third party monitoring will be conducted for the project performance against project document and E&S requirements.

8.2. Reporting back to Stakeholder Groups

The performance of managing the stakeholder engagement program will be tracked, monitored, and reported to lenders; World Bank and GEF as well as stakeholders. For lenders, the reports will have separate sections for stakeholder engagement activities (with sub-sections of local community, vulnerable groups, and NGO involvement) and grievances. Updated stakeholder map and grievance management performance against KPIs will be attached to the reports.

PIU will kick-off committee meetings (Regional Committee, Governing Council, Consultative Committee) with a brief update on stakeholder engagement activities and grievances. These updates will include consultations with vulnerable groups, local communities and NGOs and summary of feedbacks and grievances.

For grants, the grant project reporting template will have a section for stakeholder engagement and community consultation. Grantees will submit updated stakeholder maps along with their progress reports.

PIU will also publish its stakeholder engagement KPIs and progress updates on project websites monthly/quarterly.

9. TEMPLATE FOR COUNTRY SPECIFIC SEPs

World Bank's Stakeholder Engagement Plan template supported with tables will be used in country specific SEPs. Please see Annex 4.

10. REFERENCES

World Bank, 2018, *Template for ESS10: Stakeholder Engagement and Information Disclosure, Stakeholder Engagement Plan and Stakeholder Engagement Framework*

World Bank, 2018. *Guidance Note for Borrowers, Environmental and Social Framework for IPF Operations, ESS10: Stakeholder Engagement and Information Disclosure*

11. ANNEXES

ANNEX 1 - Participants List of National Consultation Meetings

Türkiye - 4 February 2021

- Ministry of Environment and Urbanisation of the Republic of Türkiye
- Sinop University, Faculty of Fisheries, Department of Marine Biology
- Ministry of Transport, Maritime Affairs and Communications of the Republic of Türkiye
- Muğla Sıtkı Koçman University
- Ministry of Foreign Affairs of the Republic of Türkiye
- KTU Faculty of Marine Science
- Ministry of Culture and Tourism of the Republic of Türkiye
- Sahil Güvenlik Komutanlığı
- Ministry of Industry and Technology of the Republic of Türkiye
- TÜRÇEV Ministry of Agriculture and Forestry of the Republic of Türkiye
- Foundation for Environmental Education in Türkiye
- Turkish Naval Forces Command
- Ilbank
- Ministry of Energy and Natural Resources of the Republic of Türkiye
- Turkish Development and Investment Bank (TKYB)
- Sarıyer Municipality, Istanbul
- UNDP Türkiye
- Scientific and Technological Research Council of Türkiye (Tubitak), Marmara Research Centre
- European Commission
- Institute of Marine Sciences of Middle East Technical University
- Conference of Peripheral Maritime Regions (CPMR)
- Ankara University, Water Management Institute
- Black Sea Assistance Mechanism

Georgia - 25 February 2021

- Ministry of Environment and Natural Resources of Georgia
- Batumi Shota Rustaveli State University
- Ministry of Education, Science and Sport of Georgia
- THE REGIONAL ENVIRONMENTAL CENTRE FOR THE CAUCASUS
- National Environmental Agency of Georgia
- CAUCASUS ENVIRONMENTAL NGO NETWORK
- Ministry of Agriculture of Adjara
- Fauna & Flora International
- Guria Administration of State Representative
- UNDP Georgia
- Kobuleti Municipality
- Energy Efficiency Centre Georgia
- Batumi State Maritime Academy
- SOCAR Industrial Services LLC
- Iv. Javakhishvili Tbilisi State University

- Black Sea Assistance Mechanism

Ukraine – 11 March 2021

- Ministry of Environmental Protection and Natural Resources of Ukraine
- Ministry of Education and Science of Ukraine
- Ministry of Foreign Affairs of Ukraine
- Ministry for Development of Economy, Trade and Agriculture of Ukraine
- National Academy of sciences of Ukraine, SSI MorGeoEcoCenter
- Управління екології та природних ресурсів Миколаївської ОДА (Department of Ecology and Natural resources of the Nikolaev regional state administration)
- Департамент екології та природних ресурсів ОДА (Department of Ecology and Natural Sciences resources of the regional state administration)
- Institute of marine biology of the NAS of Ukraine
- Odessa State Environmental University
- Bilhorod-Dnistrovsky City Council
- The State Agency of Fisheries of Ukraine
- ДП "Адміністрація морських портів України" (SE "Administration of seaports Of Ukraine ")
- National Antarctic research center of Ukraine
- Hydrogen System Engineering LLC
- Агентство местного развития Коблевской ОТГ (Local development agency Koblevskaia OTG)
- National Ecological Center of Ukraine
- Kherson State Maritime Academy
- NGO Ecoaction
- NGO Ukraine's fishing industry cluster of innovation
- АБ "УКРГАЗБАНК" (JSB UKRGASBANK)
- GFCM
- UNDP
- NGO Agricola
- State Scientific Institution "Center for Problems of Marine Geology, Geoecology and Sedimentary Ore Formation of the National Academy of Sciences
- Odessa National I.I. Mechnikov University
- Ассоциация Портовое сообщество (Port Community Association)
- Admiral Makarov National University of Shipbuilding
- Common Maritime Agenda National Hub of Ukraine
- Daynewspaper
- Conference of Peripheral Maritime Regions (CPMR)

Moldova – 22 March 2021

- Ministry of Agriculture, Regional Development and Environment of the Republic of Moldova
- Ministry of Finance of the Republic of Moldova
- Water Management Basin Authority of the Republic of Moldova
- Environmental Agency of the Republic of Moldova
- Агентство Регионального Развития АТО Гагаузия (Regional Development Agency ATO Gagauzia)
- Фонд Образования и Развития – Молдова (Education and Development Foundation – Moldova)
- State Hydrometeorological Service

- Universitatea de Stat din Tiraspol (Tiraspol State University)
- Academia de administrare Publică (Academy of Public Administration)
- Employer's Association of the Tourism Industry of the Republic of Moldova
- Institute of Chemistry
- Austrian Development Agency
- ICS "DANUBE LOGISTICS" Srl
- Institute of Power Engineering
- EU4Environment Moldova
- EcoContact
- Caroma Nord Moldova NGO
- NGO IRR Here and Now
- AO, Ecostrategii
- NGO OIKUMENA
- RAC Society and Environment
- General Fisheries Commission for the Mediterranean and the Black Sea / FAO
- Black Sea Assistance Mechanism
- PWC

Bulgaria – 22 April 2021

- Ministry of Environment and Water of the Republic of Bulgaria
- Ministry of Regional Development and Public works of the Republic of Bulgaria
- Ministry of Transport, Communications and Information Technologies of the Republic of Bulgaria
- Ministry of Tourism of the Republic of Bulgaria
- Ministry of Energy of the Republic of Bulgaria
- Municipality of Varna
- Bulgarian Maritime Administration - Varna Directorate
- Bulgarian Ports Infrastructure Company
- Stara Zagora Regional Economic Development Agency
- Institute of Oceanology, Bulgarian Academy of Sciences
- Bulgarian Academy of Science, Economic Research Institute
- Nikola Vaptsarov Naval Academy
- Prof. Dr Asen Zlatarov University of Burgas
- Burgas Free University
- Plovdiv University "Paisii Hilendarski"
- Black Sea Institute Association
- Regional Cluster "North-East"
- Union of Bulgarian Black Sea Local Authorities
- District information point Burgas
- Port of Varna EAD
- Varna Chamber of Commerce and Industry
- Bulgarian Chamber of Shipping
- Marine Cluster Bulgaria
- Center for Coastal and Marine Studies (CCMS)
- Via Pontica Foundation
- Bulgarian Biodiversity Foundation
- "CHAR - Blacksea Association for Development - Burgas" Non-profit Association for the Public Benefit
- FLAG Shabla- Kavarna-Balchik
- General Fisheries Commission for the Mediterranean and the Black Sea / FAO
- Black Sea Assistance Mechanism
- European Institute for Cultural Tourism EUREKA NPO
- Institute for Ecological Modernisation
- Black Sea NGO Network
- Association "Forum"
- Cosmos Shipping AD
- National Centre for Regional Development
- European Commission
- Bon Marine Ltd.

ANNEX 2 - Participating Organizations to Stakeholder Consultation Meeting

1. Agency Forestry of Ajara, Georgia
2. Agricola Odessa (NGO), Ukraine
3. Aici pentru Tine Association
4. Ambiente s.p.a., Italy
5. Ankara University, Türkiye
6. Aqseptence Group GmbH, Ukraine
7. Association of Ukrainian Regions of the Danube Strategy, Ukraine
8. Batumi Shota Rustaveli State University
9. Black Sea Basin Directorate Varna, Bulgaria
10. Black Sea Institute Association, Bulgaria
11. Bulgarian Academy of Sciences
12. Bulgarian Maritime Administration
13. Burgas Municipality, Bulgaria
14. Center for Problems of Marine Geology, Geocology and Sedimentary Ore Formation of the National Academy of Sciences of Ukraine
15. Civitas Georgica, Georgia
16. Conference of Peripheral Maritime Regions (CPMR), Belgium
17. Danube Logistics, Republic of Moldova
18. Ecological Counseling Center Cahul, Republic of Moldova
19. Ecological Society BIOTICA, Republic of Moldova
20. Eco-Spectrum Ltd, Georgia
21. European Environment Agency, Denmark
22. Executive Agency for Fisheries and Aquaculture, Bulgaria
23. FLAG Pomorie, Bulgaria
24. General Directorate of ILBANK, Türkiye
25. General Directorate of Maritime Affairs, Türkiye
26. General Fisheries Commission for the Mediterranean – Black Sea
27. Geological Institute of Romania
28. GMT Holding llc, Georgia
29. ICZM NFP, Georgia
30. Institute of Market Problems and Economic-ecological Research, National Academy of Science, Ukraine
31. Karadeniz Technical University, Türkiye
32. Marine Administration Executive Agency of Bulgaria
33. Marine Cluster Bulgaria
34. Ministry of Agriculture and Food Industry, Romania
35. Ministry of Development, Public Works and Administration of Romania
36. Ministry of Education and Science, Georgia
37. Ministry of Environment and Urbanization of Türkiye
38. Ministry of Environment of the Republic of Moldova
39. Ministry of Environmental Protection and Agriculture of Georgia
40. Ministry of Finance of the Republic of Moldova
41. Ministry of Foreign Affairs of Ukraine
42. Ministry of Industry and Technology of Türkiye
43. Ministry of Regional Development and Public works, Bulgaria
44. Ministry of Transport and Infrastructure of Türkiye
45. My World (NGO), Bulgaria
46. National Environment Center, Republic of Moldova
47. National Environmental Agency, Georgia
48. Odesa Polytechnic State University, Ukraine
49. Ovidius University of Constanta, Romania
50. Regional Development Agency, Gagauzia, Republic of Moldova
51. Regional Development Agency, South, Republic of Moldova
52. Regional Training Center, Budjak, Ukraine
53. Research and Production Centre, Ukraine
54. Resource and Analysis Center - Society and Environment (think-tank non-profit organization)
55. Sarıyer Municipality, Türkiye
56. State Agency of Melioration and Fisheries of Ukraine
57. State Hydrometeorological Service, Republic of Moldova
58. State Labour Inspectorate of the Republic of Moldova
59. Strategies Mer et Littoral SAS, France
60. Tbilisi State University, Georgia
61. Technical University of Varna, Bulgaria
62. The Greens Movement of Georgia
63. The World Bank
64. Tiraspol State University, Republic of Moldova
65. TUBITAK, Türkiye
66. Turkish Development Bank, Türkiye
67. Turkish Environmental Education Association (NGO)
68. Ukrainian Sea Ports Authority
69. UNDP, Water Programme
70. University of Waikato, New Zealand
71. Via Pontica Foundation, Bulgaria
72. Water Basin Management Authority, USA
73. Women's Association for Environmental Protection and Sustainable Development, Republic of Moldova

Stakeholder ESF Webinar

CONSULTATIONS ON THE ENVIRONMENTAL AND SOCIAL ASPECTS

OF BLUEING THE BLACK SEA GEF REGIONAL PROJECT -

A REGIONAL INITIATIVE

TO TACKLE MARINE POLLUTION AND CLIMATE CHANGE IN SUPPORT OF THE COMMON MARITIME AGENDA FOR THE BLACK SEA

27 October 2021

Summary

I. Objectives of the Stakeholder Consultations

The Blueing the Black Sea (BBSEA) Stakeholder ESF Webinar aimed to consult on the anticipated environmental and social aspects of the Project with all interested stakeholders focusing on the investment component of the planned BBSEA Project and expected positive and potential negative impacts and risks, requirements of the World Bank Environmental and Social Standards (ESS) and the tools and mechanisms to address the environmental and social risks and impacts.

Following an official opening and introduction of the BBSEA GEF Regional Project by key speakers, the webinar continued with the session focusing on the following environmental and social aspects of the Project:

- expected positive and potential negative impacts and risks
- the requirements of the World Bank Environmental and Social Standards (ESS), and
- the tools and mechanisms to address the environmental and social risks and impacts, including the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labour Management Procedure (LMP)
- the means and to engage with various groups of stakeholders throughout the project cycle

The webinar was highly interactive and engaged with the audience through a live (Mentimeter) survey and through questions and answers with the environmental and social experts.

BSEC disclosed draft ESMF, SEP, LMP and ESCP in English and official languages of Project participating countries on its website¹⁰, on October 11, 2021.

¹⁰<http://www.bsec-bsvkc.org/Forms/BlueingTheBlackSeaProject>

II. Participants

The webinar was opened by H.E. Amb. Lazăr COMĂNESCU, Secretary General, Permanent International Secretariat (PERMIS), Organization of the Black Sea Economic Cooperation (BSEC) and introduction of the Project was done by Ms Rositsa STOEVA, Executive Manager, BSEC PERMIS.

The webinar was held via Zoom and was well attended by 85 participants at the peak from the public, private, academia, and civil society sectors participating. There were some international experts, such as representatives of the World Bank, UNDP, the Conference of Peripheral Maritime Regions and the Black Sea Assistance Mechanism for the Common Maritime Agenda. Participants represented national and regional authorities, academia, business and civil society. A complete stakeholder list of institutions represented is provided in Annex I.

III. Structure of the Stakeholder Consultation Meeting

As indicated in the webinar agenda, the official opening and introduction of the BBSEA GEF Regional Project by key speakers were followed by presentations on:

- expected positive and potential negative impacts and risks
- the requirements of the World Bank Environmental and Social Standards (ESS);
- the tools and mechanisms to address the environmental and social risks and impacts, including the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labour Management Procedure (LMP); and
- the means to engage with various groups of stakeholders throughout the project cycle.

A questions and answers session followed the presentation where participants could ask questions, make comments through writing to the Q&A and chat box of the Zoom or by directly taking the stage. A key part of the consultation webinar was the live (Mentimeter) survey which allowed collection of information from participants and their perceptions regarding the Project and the presented environmental and social aspects .

This virtual public event was held via Zoom in English and simultaneous translation was available in four languages (Ukrainian, Turkish, Romanian, and Georgian).

IV. Summary of Discussions

In the Welcoming Address *BSEC PERMIS Secretary General*, H.E. Amb. Lazăr Comănescu provided very brief summary of the development of the BBSEA GEF Regional Project and indicated that Project is coming to the implementation stage. He mentioned that the fight against marine pollution in the Black Sea have to be carried out at regional scale and encouraged active participation and input of all related parties. He highlighted the fact that the BSEC Secretariat supports BSEC Member States in addressing this challenge and the Project will be catalysing the blue economy in the Region and contributes for closing the gap of financing for managing marine pollution in the Black Sea.

A presentation for introducing the Project was made by *Ms Rositsa STOEVA, Executive Manager, BSEC PERMIS*. She emphasized that Project aims to address the pollution in the Black Sea and this is a regional problem to be solved by all countries in the region. She summarized the key facts about the project including: financing (6.6 million dollars from GEF International Water Window, executing body (BSEC PERMIS), long term objectives (improving the health of the Black Sea and increase social and economic benefits for the population living in the region) and timeline (preparation stage is on-going

and implementation of the Project would cover a period of 4 years). The indicative Project activities at national/regional level and implementation arrangements were provided. Progress of Project preparation was presented.

The environmental and social (E&S) aspects of the Project were presented by the environmental and social experts/consultants taking part in the preparation and appraisal stage of the Project in three parts.

First part provided a summary of the Project Components and E&S aspects of the Project, emphasizing that mostly positive impacts are expected. The tools and mechanisms developed to address potential E&S risks and impacts of the Project activities were introduced, which include: Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP) and Labour Management Procedure (LMP).

In the second part, the ESMF was presented including: the ESMF development process, environmental and social requirements of the World Bank (ESF and ESSs), expected positive E&S impacts, potential adverse E&S impacts and risks, and related mitigation measures, institutional arrangements and implementation process, and, finally, monitoring and reporting.

The third part concentrated on the SEP. The presentation covered the purpose and principles of stakeholder engagement, steps of SEP development process, execution of SEP, development of country specific SEPs, main stakeholder engagement activities, involvement of vulnerable groups, grievance mechanism, and monitoring and reporting.

The presentations were followed by the Q&A session (through the chat box and direct questions), which included comments and suggestions. These remarks/comments/questions could be listed in summary as follows:

- For bluing the Black Sea, we should keep in mind the integrated nature of the issues and need for a forward looking approach.
- The language differences to be considered are mainly between sectors and stakeholders, rather than countries and regions.
- If the two grievance redress mechanisms are both managed by BSEC, why is there a need for two separate mechanisms?
- For preventing the pollution in the Black Sea cooperation in maritime education on all levels - school, university, non-formal – is needed.
- There is also an initiative by the OECD in the area covering the Black Sea countries, and on Green Action Plan.
- The announcement and invitation for the Regional Webinar on the Greening the Maritime Transport and Preparedness for Marine Pollution Prevention in the Black Sea Region was made by the representative of Turkish Ministry of Transport and Infrastructure.

All of the above mentioned remarks and questions were addressed/answered by the environmental and social consultants in the webinar. The Q&A session was followed by a live survey through which information and perceptions regarding the Project and the presented environmental and social aspects were collected. The link to the Mentimeter survey would be kept open for anyone who could not join the webinar or would like to give additional feedback.

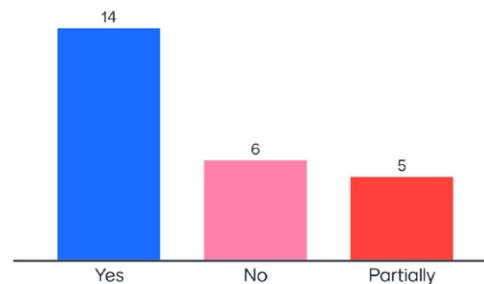
Ms Rositsa STOEVA, Executive Manager, BSEC PERMIS, who closed the webinar, thanked the audience for their contribution and added that all the shared ideas are very important. She also announced that the presentations and all relevant information are available at the following website: <http://www.bsec-bsvkc.org/Forms/BlueingTheBlackSeaProject>. In addition, there would be country

specific discussions on the eco-innovation challenge including the E&S aspects. It was also emphasized that BSEC and the World Bank sees the stakeholder engagement as a very important and continuous process as was one of the major feedbacks obtained from the Mentimeter survey results.

V. What feedbacks were received from the survey?

During the webinar, the participants were also invited to take part in a live survey and provide input on the Blueing the Black Sea (BBSEA) GEF Regional Project and managing the environmental and social aspects of the Project. The results of the survey are summarized below.

Q1- Most of the survey participants (about 80%) were already informed about the BBSEA to some extent before the consultation meeting.

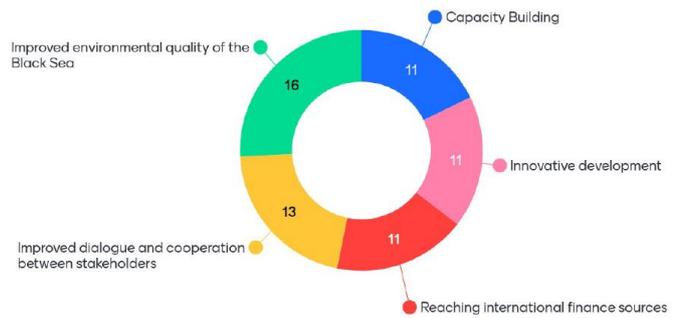


Q2- The expectations of the survey participants for their own country from the BBSEA Project were rather various. They could be mainly categorized as; reduction and prevention of water and sea pollution, enhanced national/institutional capacities in terms of legislation and water pollution, increased awareness, and new opportunities for regional development projects.

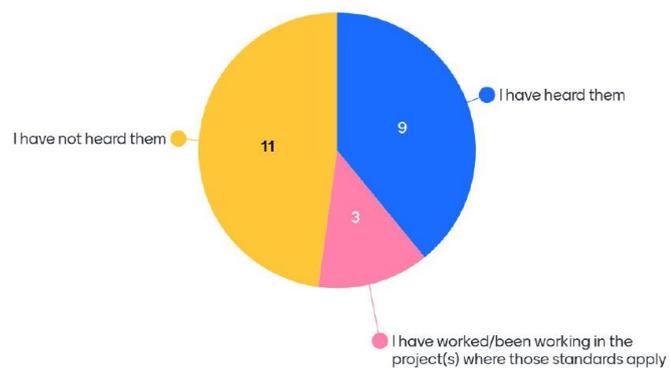
Enhanced national capacities	Pollution prevention	reduction of pollution in the context of protection and sustainable use of water resources
supporting full water treatment plants recycling industry	Recommendations for a Clear and understandable legal framework on the issue	Higher awareness of the issues and taking responsibility for reducing pollution loads
improved environment, pollution reduced	reducing the level of pollution and popularizing the issues of environmental preservation in Ukraine.	New possibility for regional development projects
Decreasing water pollution in the country	reduction of pollution	responsiveness on behalf of the gov agencies
help resolve key issues that inhibit blueing improve biodiversity and ecosystem based activities such as recreational angling economy, prevent pollution	Tangible decrease of impact on the Black Sea environment	It may motivate industries to maintain more sustainable productions on both national and international scale
mitigation deep sea domestic waste charging"	the strengthening the capacity to implement EU legislation	Rehabilitate rivers
reduction of pollution	Joint sustainable action in the region on litter pollution	Reduction of sea pollution and sustainable aquatic life

Q3- The major benefits of the BBSEA Project for the institutions of survey participants were concentrated under 5 themes (from the highest to lowest votes):

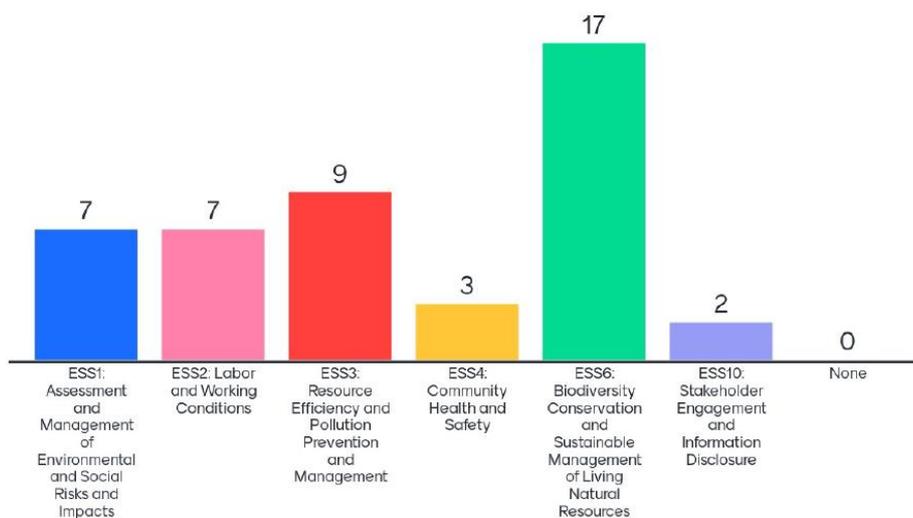
- improved environmental quality of the Black Sea
- Improved dialogue and cooperation between stakeholders
- Capacity building
- Innovative development
- Reaching international finance sources



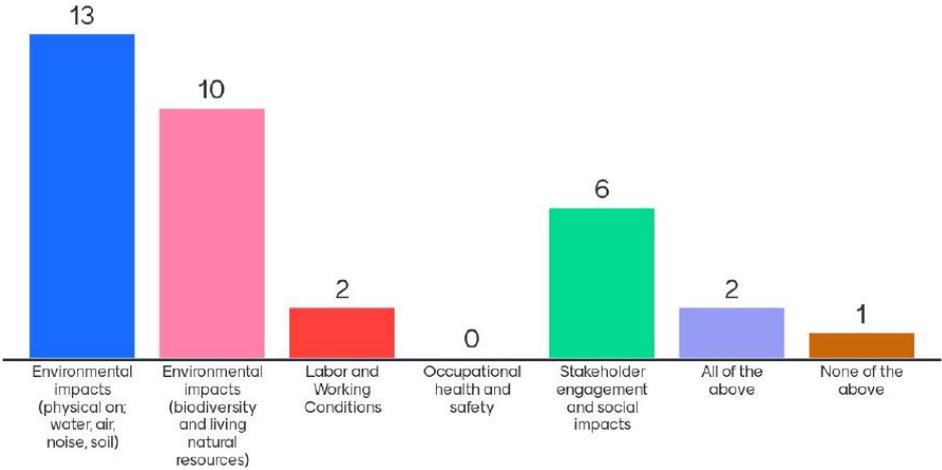
Q4- About half of the survey participants had not heard of the World Bank Environmental Social Standards (ESS) before the consultation meeting and about 40% only heard of them. Only about 15% of the participants stated that they have worked on the projects applying the ESSs.



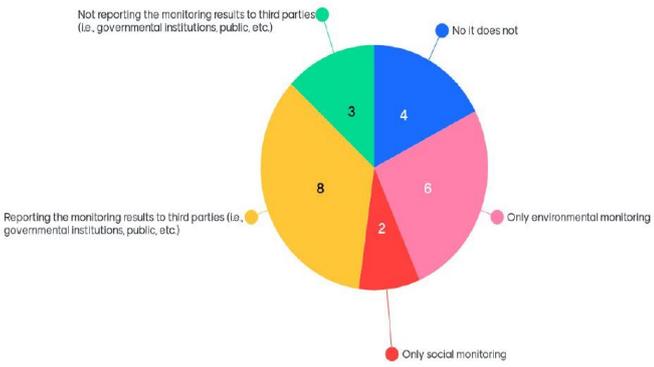
Q5- Most of the survey participants think that among the World Bank ESSs applicable for the BBSEA ESS6 would be the most difficult to implement in their country or by their institution. In terms of difficulty in implementation ESS3, ESS1 and ESS2 follow ESS6.



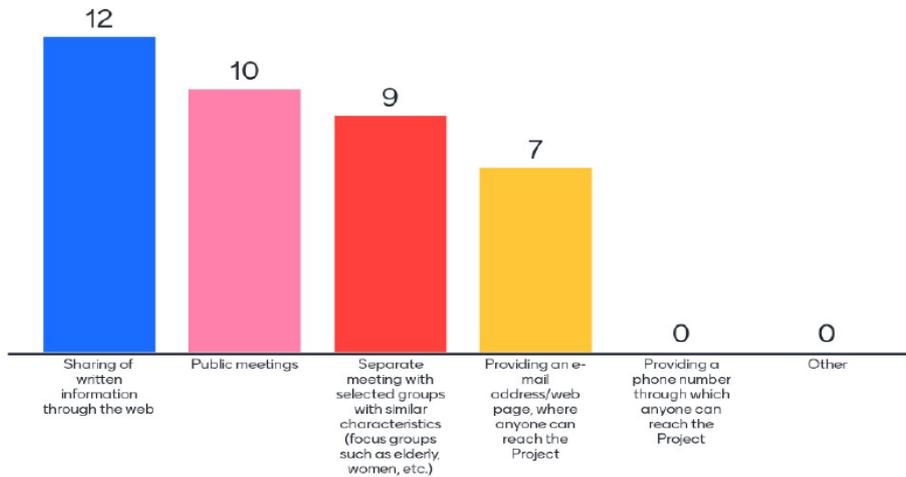
Q6- With regard to the major impacts expected in implementation of the Project activities (especially the physical ones), most of the survey participants indicated that environmental impacts (on physical and biological environment) would be of main concern. The next issue following these is stakeholder engagement and social impacts.



Q7- About 15% of the survey answers indicated that the institutions of the participants are not involved in any environmental and social monitoring, and reporting activities. In this context, social monitoring is comparatively lower than environmental monitoring.



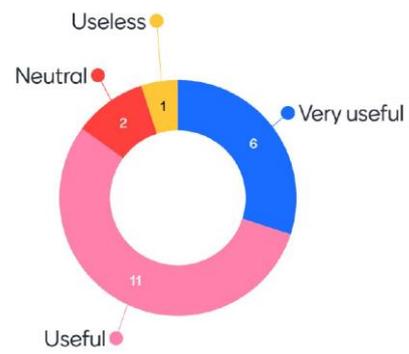
Q8- The answers of survey participants revealed that the most effective way of information disclosure and public consultation method for the BBSEA Project would be sharing of written information through the web. This option was followed by conducting public meetings and meetings with selected groups with similar characteristics (focus groups such as elderly, women, etc.).



Q9- The survey results revealed that transparency and stakeholder engagement are seen as the most important parameters for effectiveness and success of the Project.



Q10- Most of the survey participants voted that they found the meeting at useful or very useful. Among the 20 votes, there is only 1 vote indicating that the meeting was useless and there are 2 votes being neutral.



Annex 4 - Template for Country Specific Stakeholder Engagement Plans

1. Introduction and Project Description
2. Brief Summary of Previous Stakeholder Engagement Activities
3. Stakeholder Identification and Analysis

Stakeholder Identification Table

Stakeholder	Relation w/project	Stakeholder category	Geography	Relevance to project

Stakeholder Analysis Table

Stakeholder category	Stakeholder	Impact/Interest level (high/ low)	Influence level (high/ low)	Expectation / Concern	Position

4. Stakeholder Engagement Program
 - 4.1. Proposed strategy for information disclosure
 - 4.2. Proposed strategy for consultation
 - 4.3. Proposed strategy to incorporate the view of vulnerable groups
 - 4.4. Stakeholder Engagement Activity Plan

Project Stage	Stakeholder	Purpose of engagement	Methods used	Timing / Frequency	Venue	Responsibilities

5. Resources and Responsibilities
6. Grievance Mechanism
7. Monitoring and Reporting

ANNEX 5 – Feedback and Grievance Form

Feedback and Complaint Form			
Date			
Name			
Contact information	email		
	phone		
	address		
Preferred language for communication	<i>English, Georgian, Moldovan, Turkish, Ukrainian, Russian</i>		
General Feedback			
<i>Please summarise your comments, questions, or concerns.</i>			
Complaint			
<i>Please describe the incident or complaint.</i>			
Date of incident		Location of incident	<i>Country / City / Village</i>
What do you suggest for resolution?			

Please include any other information that may be relevant to this incident/complaint.

Photographs, documents anything that would be useful to understand the complaint.

Your personal information will be recorded for the purpose of data analysis of stakeholder consultation and to respond to your complaint. To resolve your complaint, the information you provided may be shared if necessary, with other parties involved in the Project, but will not be sold or distributed to any third party. In cases where information is communicated to parties that are not involved in the resolution of the grievance, your personal information will not be provided. You have the right to contact BBSEA-GEF Project at any time to obtain access to your personal information and to request BBSEA-GEF Project to rectify any personal information which you feel is not accurate.