

Environmental and Social Due Diligence, Impact Assessment and Road Safety Audit for the Moldova TENT-T Road Network Rehabilitation Project, DTM 55768

Stakeholder Engagement Plan,
Tranche 2, M3 (4 Lots)

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2. Project sheet

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	Client	Consultant	Implementing partner
Name:	European Bank for Reconstruction and Development	MC Mobility Consultants GmbH	
Address:	Five Bank Street London, E14 4BG United Kingdom	Zwölfergasse 8/3/28, VIENNA, 1150, Austria	
Tel. number:		+4318923600	
Contact person:	Dadabaev, Jamol	Holger Eiletz	
Email address:	DadabaeJ@ebrd.com	holger.eiletz@vienna-mc.com	
Signatures:			
Name of the Experts:	Egidijus Skrodenis, Project Manager Sabine Stumpf-Langer, Deputy Project Manager Tatiana Ilescu, Environmental Specialist Marina Grosu, Health and Safety Specialist Dovydas Skrodenis, Road Safety Auditor Ala Rotaru, Biodiversity Specialist Sanne Vermeulen, Social Specialist Violeta Paginu, Environmental Specialist		

2.1. Abbreviations

Abbreviation	Description
AoI	Area of Influence
CPA	Central Public Authority
CRPD	Convention on the Right of Person with Disabilities
CPB	Cross Border Point
DD	Detailed Design
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EP	Environment Permit
EPIC	Eastern Partnership Investment in Connectivity
ESDD	Environmental and Social Due Diligence
ESA	Environmental and Social Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
EU	European Union
FGD	Focus Group Discussions
GD	Government Decision
GO	Government Order
GLP	Grievance Local Point
GFP	Grievance Focal Point
GRM	Grievance Redress Mechanism
NGO	Non-Governmental Organization
NRA	National Road Administration
NTS	Non-technical Summary
LPA	Local Public Authority
MIDR	Ministry of Infrastructure and Regional Development
PR	Performance Requirement
PAP	Project-Affected People
RAP	Resettlement Action Plan
RM	Republic of Moldova
LARF	Land Acquisition and Resettlement Framework
SEP	Stakeholder Engagement Plan
SIF	Sustainable Infrastructure Fund
TEN-T	Trans-European Transport Network
ToR	Terms of Reference

2.2. Important Notice/Disclaimer

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3. Stakeholder Engagement Plan (SEP)

3.1. Introduction and Project Overview

The European Bank for Reconstruction and Development (EBRD) is considering a sovereign loan to the Republic of Moldova for rehabilitation, upgrades and new constructions of the road network grouped by 2 Tranches (Tranche 1 – R7 road and Tranche 2 – M3 road) and categorized according to the E&S Policy of the Bank. Tranche 2 concerns the rehabilitation and upgrade of 4 sections of the road M3 Chişinău – Cimişlia – Comrat – Giurgiuleşti, a priority part of the Trans-European Transport Network (TEN-T) Core Corridor in the Republic of Moldova.

The Project is implemented by the National Road Administration (NRA) under the supervision of the Ministry of Infrastructure and Regional Development (MIDR) and financed by the by the European Union from the Eastern Partnership Investment in Connectivity (EPIC) and Sustainable Infrastructure Fund (SIF) and is implemented by the European Bank for Reconstruction and Development (EBRD).

The works include pavement strengthening, bridge and drainage rehabilitation, construction of safety barriers, installation of traffic-safety devices, junction improvements and construction of a new bypass in Giurgiuleşti aimed at improving regional connectivity, travel efficiency, road safety.

During the planning and development of any road infrastructure project, it is essential to consider social, environmental and road safety aspects, as they can negatively affect the environment (soil, water, air, flora, fauna), people's health and well-being, as well as local economic activities.

For this purpose, is carrying out an Environmental and Social Due Diligence, Impact Assessment and Road Safety Audit for the Moldova TEN-T Road Network Rehabilitation Project, DTM 55768.

Tranche 2 of the Project, with the lots identified below, is classified as Category A under EBRD policies.

It is considered that it may have significant environmental and/or social impacts, including direct and cumulative effects that are new, additional and cannot be readily identified or assessed at the time of classification. A Category A road project typically involves linear impacts across multiple communities and administrative units, land acquisition / expropriation, construction nuisances (noise, dust, vibration, traffic disruption), labour influx and contractor camps, risks to vulnerable groups (roadside residents, farmers, elderly, low-income households). Also, such projects require a formalized and participatory Environmental and Social Impact Assessment (ESIA) process.

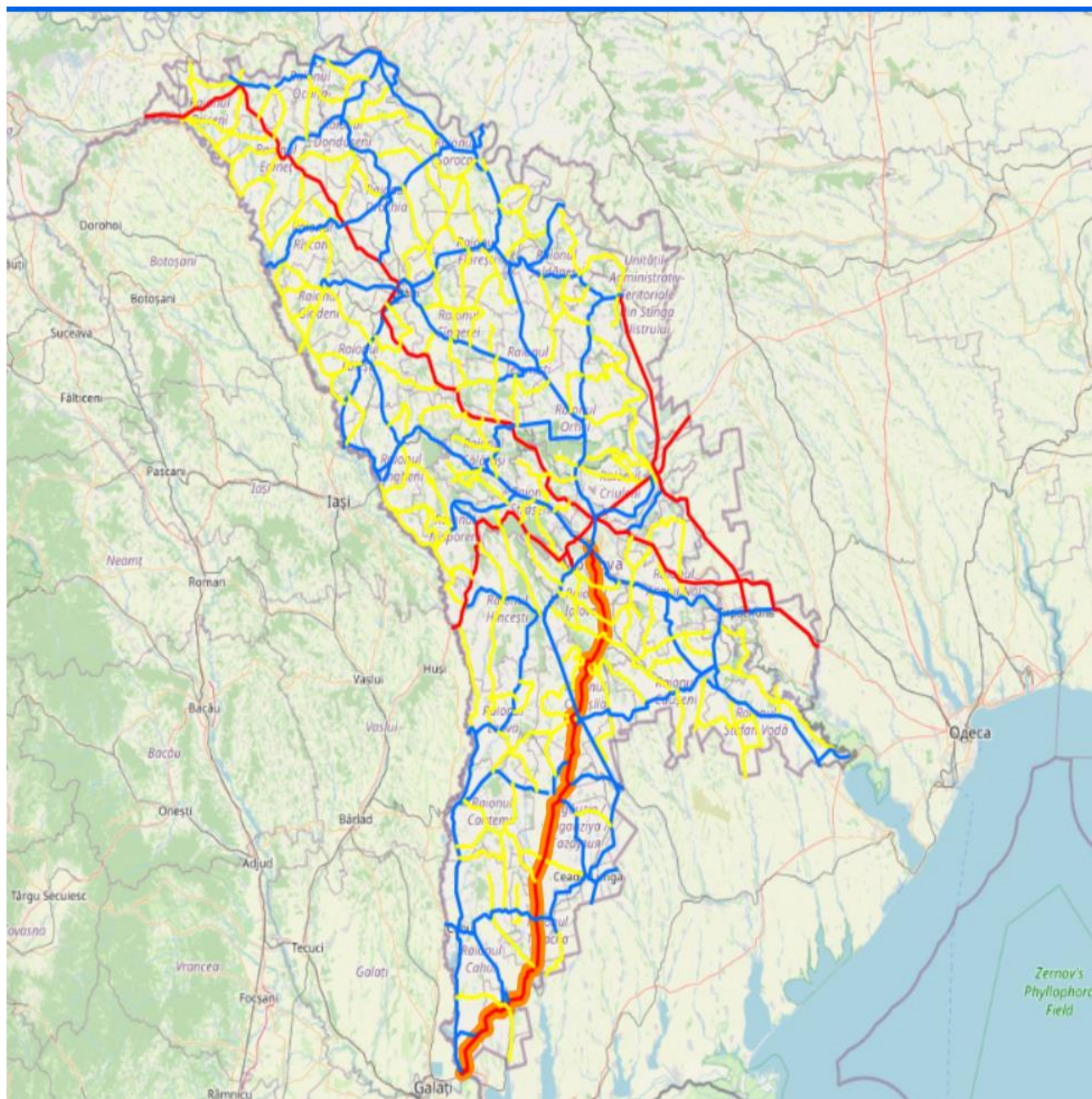


Figure 3-1: General overview of M3 road¹

Tranche 2 consists of **72 km of the M3 Road** (Chișinău – Comrat – Giurgiu – Romanian border), geographically located in the central and southern regions of the Republic of Moldova, within the administrative territories of Chișinău Municipality and the districts of Ialoveni, Cimișlia, and Cahul.

The M3 Road provides the shortest connection between the capital city of Chișinău and Giurgiu, the southernmost locality of the country. At the same time, the M3 corridor is an integral part of the European road E577 (Poltava – Kirovograd – Chișinău – Giurgiu – Galați – Slobozia), ensuring connectivity between the European transport corridors IV and IX.

¹ source image: www.andsa.md road interactive map. detailed information how to use the interactive map the link: <https://www.andsa.md/comunicate-de-presa/harta-interactiva-drumurilor-publice-nationale-instructiuni-de-utilizare/>

The M3 route in Moldova has been under continuous reconstruction in recent years, with many previously repaired sections, but also with large newly constructed road segments, which should make this road much more direct and faster, bypassing most localities.

Major interventions on the M3 route are:

1. The rehabilitation of Porumbrei-Cimișlia segment 19 km on 2 lanes – EIB finance
2. Construction of the Comrat city ring road – EIB finance
3. Construction of the Sagaidacul-Nou bridge, which made it possible to continue two-lane traffic in each direction – National Road Fund (NRF)
4. Ongoing works on the Vulcănești city ring road – EBRD finance
5. Ongoing works on the Slobozia Mare bypass road – EBRD finance
6. Rehabilitation of the sector - exit from the Comrat ring road to the Vulcănești ring road – EBRD finance
7. Rehabilitation of the sector - exit from the Vulcănești ring road to the Slobozia Mare bypass – EBRD finance

The activities to modernize and expand the M3 road continue, with the aim of streamlining traffic and ensuring a faster and safer road connection between regions, as well as redirecting transit traffic, including heavy trucks from localities, will considerably reduce the polluting factors of the urban environment, as well as increase the safety of traffic participants.

The following sectors are in the process of implementing:

1. Cimișlia city ring road
2. The construction of the parking lot adjacent to the bypass road of the village of Giurgiulești.
3. The Customs Control Platform near Giurgiulești and improving conditions in the Giurgiulești CBP.

The figure below shows the Tranche 2 Project alignment within Lots 1–4.

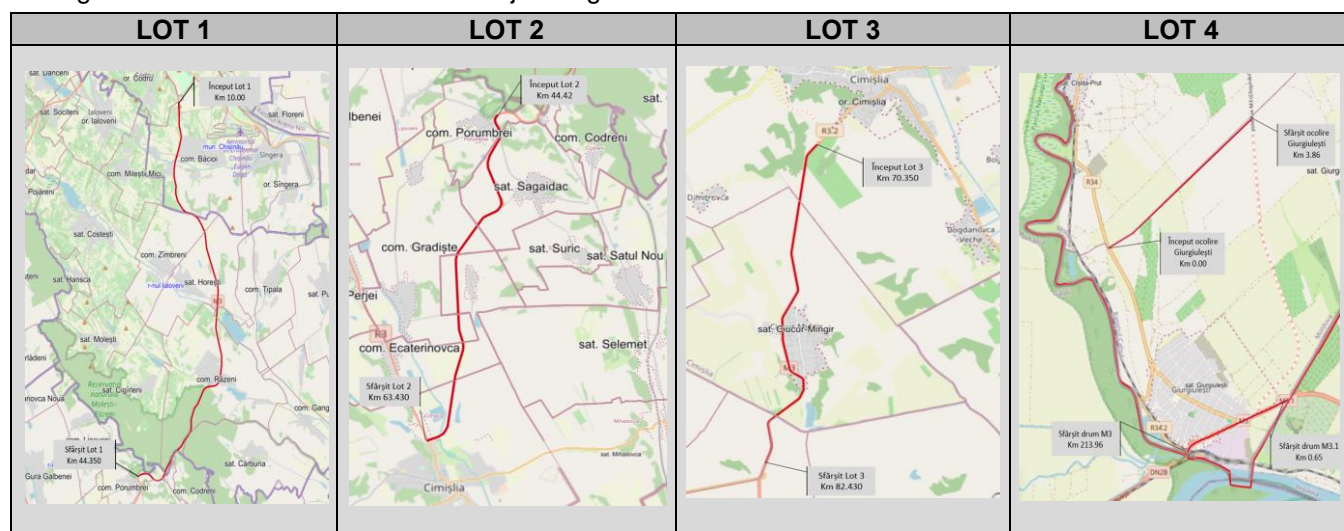


Figure 3-2: Project alignments and Lots 1- 4.

Approximate lengths and main administrative areas are shown and summarised below:

Lot	Approx. Length (km)	Key Administrative Units / Settlements within Aol
1	34,4	Chișinău municipality – Băcioi commune (with Băcioi, Straisteni, Frumușica and Brăila villages), Ialoveni district – Răzeni commune (with Mileștii Noi village), Horești commune and Țipala commune (with Budăi and Bălțați villages), Cimișlia district – Porumbrei commune (with Sagaidacul Nou village)
2	19	Cimișlia district – Porumbrei village, Grădiște commune (with Iurievca village), Ecaterinovca commune (with Coștangalia village) and Sagaidac villages, Cimișlia city
3	12	Cimișlia district – Cimișlia city, Ciucur-Mingir village
4	6,2	Cahul district – Cășlița-Prut village and Giurgiulești village

Table 3-1: Overview of the administrative areas of the different Lots

Lot 1 (Chişinău Airport – Porumbrei, 34.4 km) – rehabilitation of the road

This section crosses Chişinău Municipality, Ialoveni, and Cimişlia districts, serving peri-urban communities with direct links to the capital. Băcioi, with 9,344 residents across four villages, lies within Chişinău Municipality and benefits from direct access to both the M3 and the capital. Răzeni, one of the oldest settlements in Ialoveni, counts about 5,098 residents and is situated directly along the corridor. Horeşti (2,378 residents) and Țipala (3,186 residents) are mid-sized communes, with businesses, recreational areas, agricultural lands close to the road and are particularly exposed to noise, safety risks, and accessibility changes. At the southern end of Lot 1, Porumbrei (994 residents) in Cimişlia district marks the transition into Lot 2 and functions as a junction settlement.

Lot 2 (Porumbrei – Cimişlia, 19 km) – widening from 2 to 4 lanes (rehabilitation/construction)

This lot passes through rural communes in Cimişlia district. Sagaidac (1,214 residents) is the administrative seat of its commune and is dependent on road access for agricultural trade. Grădişte (1,150 residents, including Iurievca) is notable both for its rural economy and its archaeological heritage, with sites linked to the Upper Trajan's Wall. Ecaterinovca (910 residents, together with Costangalia) is interconnected with M3 corridor, with Costangalia (652 residents) situated on the opposite side of M3 and identified as particularly vulnerable due to its small size and proximity to construction works. The main urban centre is Cimişlia town (8,552 residents), located at the crossroads of five national roads and hosting the Southern Development Agency. Its dual role as a transport hub and administrative centre makes it central to both project benefits and traffic-related risks.

Lot 3 (Cimişlia – Comrat, 12 km) – rehabilitation of the road

This section strengthens connectivity between the Cimişlia district and the Autonomous Territorial Unit of Gagauzia. Ciucur-Mingir (887 residents) is a roadside commune with direct exposure to traffic and construction impacts. Bugeac (1,178 residents) is situated just nine kilometres from Comrat and will benefit from improved access to regional markets. The lot also strengthens access to Comrat city, a regional centre with strong economic and political relevance.

Lot 4 (Giurgiuleşti bypass, 6.2 km) – rehabilitation of the road section between CBP - Cross Border Points Giurgiuleşti – Galaţi (Romanian border) and Giurgiuleşti- Reni (Ukrainian border)

The southernmost section focuses on the village of Giurgiuleşti (1,850 residents), Moldova's only settlement with direct access to the Danube. It is currently burdened by heavy transit traffic and associated road safety risks. The bypass will relieve congestion and improve safety. Nearby Cîşliţa-Prut (760 residents) is another small commune along the Prut River, exposed to cross-border transport dynamics.

Between 2020-2025, Giurgiuleşti village is facing major ongoing interventions and planned projects on road and CBP infrastructure as follows:

1. Ongoing works on the **Slobozia Mare bypass road** - 70% ready by end of 2025 - EBRD finance, aiming to: divert transit and heavy traffic away from settlements, reduce congestion and accidents in built-up areas, improve travel time and logistics reliability for freight movements to/from the south.
2. The **construction of the parking lot adjacent to the bypass road of the village of Giurgiulesti** – Detailed Design and concept elaborated.
3. The **Customs Control Platform near Giurgiuleşti** and improving conditions in the Giurgiulesti CBP – World Bank ESIA, SEP, RPF elaborated. One of the components of the Project is Solidarity Lane customs facilitation & BCP upgrades (Giurgiulesti). This subcomponent will encompass the following activities: (i) traffic organization and implementation of an electronic queuing system at the Moldovan side of Giurgiulesti BCP.

This will help streamline and improve the efficiency of border crossing procedures, reducing waiting times and congestion. Traffic congestion often leads to idling vehicles, which consume fuel inefficiently and produce more emissions. By reducing congestion and allowing smoother traffic flow, vehicles can operate more efficiently, consuming less fuel and emitting fewer greenhouse gases. (ii) Expansion of the capacity of the existing parking/waiting facility in Giurgiulesti area, along with the provision of basic services such as toilets and water supply points for truckers. This will enhance the facilities available to truck drivers, ensuring their comfort and convenience during waiting periods. (iii) Procurement and installation of scanning equipment and software at the BCP facility. This will enable efficient and effective scanning of goods and vehicles passing through the border, enhancing security measures and facilitating smoother border control processes. (iv) Supervision services are also included under this subcomponent, to ensure proper oversight and monitoring of the implementation of the activities.

4. FS and DD for **R34 road in Giurgiulesti, including bypass of Giurgiulesti concept (associated facilities)**. The Feasibility Study for R34 Hincești-Leova-Cahul-Giurgiulesti Road Repair Project, roughly the start of Cahul Bypass (start of road sector at km 124+835), intersection with M3.1 Road in Giurgiulesti village (end of road sector at km 180+600). The R34 road is a route that links Hincești-Leova-Cahul-Slobozia-Mare, it is a short access way towards the South Prut areas and to the centre of the Republic. The disadvantage of this route is that it crosses a significant number of villages, including Giurgiulești, village where this road constitutes the main street and where it is not possible to allocate additional land for road sidewalks, drainage system for rainwater, lawns, etc. At km 167 in Slobozia Mare village, the R34 highway is connected to M3 highway. Thus, taking into account the rehabilitation works on about 80% of M3 Road and the new construction works on Slobozia Mare Bypass, with traffic diversion directly to the final destination, the Giurgiulesti port, the road at the moment is overloaded with the traffic that will be further taken over by M3 road, ensuring the link between Chisinau and Giurgiulesti.
5. The **bridge connecting Galați to Giurgiulesti village** in Moldova was built in 1949 and was rehabilitated at the end of 2021.
6. In 2022, the **broad-gauge railway line connecting Galati port to Giurgiulesti** was reopened, after a CFR Infrastructure project whose purpose was for freight trains coming from Ukraine with grain to unload directly at Galați Port, without needing transshipment at the border.
7. Investments have also been made in the area near the border crossing point lately. Following a project of **Galati County Council and the Romanian National Road Company, a modern road will be built that will connect Giurgiulești customs to the bridge over the Danube in Brăila**.
8. Extension of **Giurgiulesti cargo port is planned soon**. An ESIA was developed and are in the process of approvals at transborder level.

The Area of Influence (AoI) of Tranche 2 includes the road corridor (approximately 500 m on each side of the centreline) and settlements within roughly 2 km of junctions and access points.

Based upon the Project footprint and key design features, the Area of Influence (AoI) was defined as the area likely to be affected by:

- The Project activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the Project;
- Impacts from unplanned but predictable developments caused by the Project that may occur later or at a different location;

- Indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are wholly or partially dependent;
- Associated facilities, which are facilities that are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable;
- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing or planned developments at the time of ESIA Report preparation.

A Stakeholder Engagement Plan (SEP) has been prepared in accordance with the Terms of Reference and the European Bank for Reconstruction and Development (EBRD) Performance Requirement 10 (PR10, Information Disclosure and Stakeholder Engagement, 2019). The SEP outlines the approach for identifying and engaging stakeholders, ensuring transparent communication and effective management of feedback and grievances throughout all stages of the M3 Road Rehabilitation Project – Tranche 2.

The main phases relevant for stakeholder engagement therefore include:

- Pre-construction (planning and design): disclosure of ESIA findings and consultation on land-acquisition or access issues;
- Construction: information on traffic management, safety and temporary disruptions;
- Operation: feedback on road performance, maintenance and community safety.

This SEP accompanied the ESIA (Environmental and Social Impact Assessment) at the scoping stage and was updated prior to disclosure of the draft ESIA to incorporate stakeholder feedback and information gathered from the baseline data collection (detailed minutes of meeting from community engagement and resume of baseline data collection in ANNEX G). Stakeholder engagement is an integral component of the ESIA process and will continue throughout design, construction, and operation.

The SEP also defines how information will be disclosed, how consultations will be conducted at key stages of the Project, and how grievances from communities and workers will be managed throughout the Project lifecycle.

Stakeholder engagement is particularly important for this Project due to categorisation of the road as an express road, its linear nature, cross-border interfaces, and land acquisition requirements.

All engagement activities will follow the principles of openness, inclusiveness, cultural appropriateness, and bilingual disclosure (Romanian / Russian where needed) to ensure that all affected and interested parties can participate meaningfully.

The 10 most important elements of a meaningful stakeholder engagement are described in the table below:

No	Elements of meaningful stakeholder engagement	Description
1	Identification of priority issues	Early identification of key environmental, social and contextual issues that matter most to stakeholders and may influence project design or acceptability.
2	Stakeholder identification and analysis	Systematic identification of project-affected parties and other interested stakeholders, including vulnerable groups, and analysis of their interests, influence and concerns.
3	Prior information disclosure	Timely provision of relevant, accurate and understandable information to stakeholders before consultations take place, enabling informed participation.
4	Appropriate forums and methods for consultation	Use of culturally appropriate, accessible and risk-proportionate engagement methods (meetings, focus groups, interviews, surveys, etc.).
5	Transparency in decision-making	Clear documentation, public disclosure and communication on how decisions are made and how stakeholder inputs are considered.
6	Integration of stakeholder perspectives into design and implementation	Incorporation of stakeholder views into project design, mitigation measures, implementation decisions and monitoring.
7	Baseline data and action plans	Use of stakeholder input to support baseline data collection and the development of action plans addressing identified risks and impacts.
8	Management systems incorporating stakeholder	Embedding stakeholder engagement into the project's environmental and social management systems and procedures.

No	Elements of meaningful stakeholder engagement	Description
	engagement	
9	Grievance mechanism	Establishment of accessible, transparent and non-retaliatory mechanisms to receive, assess and resolve grievances from stakeholders.
10	Ongoing engagement throughout the project life cycle	Continuous engagement from project preparation through construction, operation and closure, including disclosure of changes and feedback on performance.

Table 3-2: Major elements of stakeholder engagement

3.2. Legal and Institutional Framework

The stakeholder engagement for the M3 Road Tranche 2 Project is governed by the national legislation of the Republic of Moldova, the international conventions ratified by the country, and the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2019), in particular Performance Requirement 10 (Information Disclosure and Stakeholder Engagement).

This section summarises the applicable framework and its harmonisation with EBRD requirements.

3.2.1. National Legislation vs EBRD PR10 - Gap Analysis

Law / Regulation	Key Provisions Relevant to SEP	Alignment with PR10 / Harmonised Approach
Law No. 86/2014 on Environmental Impact Assessment	Requires public participation during EIA: publication of notice, 30-day review period, public hearing prior to environmental authorisation.	PR10 demands earlier and broader engagement; SEP applies both scoping and draft ESIA consultations with 120-day disclosure for Category A Projects.
Law No. 148/2023 on access to information of public interest (amended 2024, replacing Law 982/2000)	Defines rights, provides obligations, and oversight for access to information. Oversight: People's Advocate (Ombudsman).	Provides general disclosure rights; SEP ensures proactive publication of project documents and bilingual access
Law No. 239/2008 on transparency in decision-making	Requires draft acts and documents of public interest to be published for consultation (minimum 10 working days).	Incorporated into SEP scheduling and advance notice for meetings.
Law No. 1515/1993 on environmental protection	Establishes the public right to participate in environmental decision-making.	Fully consistent; forms SEP's legal foundation for consultation.
Government Decision No. 489/2024 on procedure for issuing the urban planning certificate for design and the construction/demolition authorization for public utility works of national interest	Mandatory informing the landowner or, as the case may be, the central or local public administration authority empowered with administration powers in the field of public property about the intention to initiate design works.	Fully consistent; forms SEP's legal foundation for early consultation, need meaningful consultation with affected communities.
Government Decision No. 1467/2016 on public access to environmental information	Sets out detailed procedures for dissemination of environmental information.	Complements SEP's disclosure plan and web posting requirements.
Administrative Code of Republic of Moldova, No.116/2018	Establishes procedure for consideration of petitions of the RM citizens addressed to the relevant authorities/bodies for the purpose of ensuring protection of petitioners' rights and legitimate interests.	A GRM is project-level, easily accessible to all stakeholders, including vulnerable groups (rural communities, elderly people, low-income households). Complaints can be submitted verbally, in writing, online, by phone, or through community representatives, unlike administrative petitions which often require formal written submissions and legal knowledge

Table 3-3: Overview of the relevant national legislation

While Moldovan legislation provides a legal basis for access to information and public participation, it does not fully

meet the requirements of EBRD PR10 for a Category A road project. Significant gaps exist in relation to project-level stakeholder engagement, early and continuous consultation, identification of vulnerable groups, structured information disclosure, and establishment of a project-specific grievance mechanism. Full compliance with PR10 therefore requires the implementation of additional, project-specific engagement instruments beyond national legal requirements.

Issues	EBRD PR 10	Moldovan Framework	GAP
“Project-level system” vs “authority-led procedures”	Requires the client to run a continuous engagement system (SEP + updates) throughout the project lifecycle.	Laws mainly regulate what public authorities must do (decision transparency, EIA consultations, access to official information)	Compliance with EIA/public consultation can still fall short of PR10 unless the client implements an SEP and ongoing engagement beyond permitting.
Stakeholder identification & vulnerability analysis	Explicit stakeholder mapping, including disadvantaged/vulnerable groups, tailored methods, and barrier removal (language, disability access, etc.)	Transparency/EIA rules enable participation but are generally procedural and do not always require a structured vulnerability/barrier assessment at project level.	Need a PR10-style stakeholder database, vulnerability screening, differentiated engagement
Early engagement (before decisions are “locked in”)	Engagement begins at the earliest planning stage and continues.	EIA consultation is often strongest once EIA documentation exists; Law 239/2008 supports consultation on draft decisions by authorities, but timing/quality can vary by process.	PR10 expects pre-ESIA scoping dialogue and iterative design feedback loops.
Disclosure standards (content + accessibility)	Disclosure must be timely, understandable, accessible, and proportionate to risk; expects non-technical summaries and ongoing updates.	Law 148/2023 strengthens access and proactive transparency obligations, but it is a right-to-request / public-information regime, not a guarantee of PR10-style project packages (SEP, ESAP updates, monitoring summaries, etc.)	PR10 requires a curated project disclosure package (Non-Technical Summary (NTS), SEP, Construction schedule & impacts, Land acquisition principles, GRM procedures, periodic monitoring updates), not just compliance with access-to-information rules.
Grievance mechanism (project GRM) vs administrative petitions	Requires a project-level grievance mechanism that is accessible, culturally appropriate, allows anonymous complaints (where appropriate), has clear timelines, tracking, escalation, feedback, and does not block judicial/administrative remedies. GRM covers Construction impacts, Contractor behaviour, Land access, Safety concerns	Administrative Code of Republic of Moldova, No.116/2018 provides for petitions to public bodies, but it is not designed as a project GRM with site-level intake, contractor grievances, worker/community channels, tracking analytics, and learning loops.	Petitions are not PR10 GRM. EBRD expects a dedicated, resourced, documented GRM run by the client/contractors.
Reporting back Key concerns identified, mitigation measures adopted and monitoring of engagement effectiveness	Requires reporting to stakeholders, documenting consultation outcomes, and adjusting engagement based on effectiveness and changing risks.	EIA rules require public information/consultation steps, but do not always require ongoing disclosure of implementation performance post-approval (unless tied to permit conditions)	PR10 expects continuous feedback + monitoring indicators (e.g., grievances trends, meeting coverage, vulnerable group reach)
Coverage beyond “environmental public participation”	Covers not only environment—also social issues, land acquisition/resettlement interfaces, community health & safety, labor	EIA participation focuses on environmental impacts; transparency law addresses decision-making generally, but PR10’s scope is broader and integrated.	Need integrated engagement on E&S topics well beyond statutory EIA.

Issues	EBRD PR 10	Moldovan Framework	GAP
	influx, contractor conduct, etc.		
Meaningful consultation	Two-way dialogue, documentation of concerns, feedback on how comments influenced decisions	Public hearings and written comments, no obligation to show key concerns identified and mitigation measures adopted.	Consultation without ongoing stakeholder feedback mechanism
Construction phase & contractors	Engagement continues during construction, Contractors must comply with SEP and GRM Community safety and traffic management are engagement topics.	Contractor obligations mainly technical, Stakeholder engagement rarely included in contracts	Contractors not integrated into engagement system

Table 3-4: Summary Gap - Moldovan Legislation vs EBRD PR10

Implementing steps to close gaps (PR10-compliant measures)

1. **Prepare/maintain a Stakeholder Engagement Plan (SEP)** aligned to PR10: stakeholder mapping, methods by group, schedule, responsibilities, disclosure plan, and monitoring KPIs.
2. **Create a PR10 disclosure package** (minimum): non-technical summary (NTS), SEP, GRM procedure, key risks/mitigation, construction schedule impacts, contact points, periodic updates.
3. **Implement a project-level GRM** (not only petitions): Multiple channels (in-person/site, phone, email, web form), clear timelines, registry, escalation, close-out confirmation, analytics.
4. **Integrate statutory consultations** (based on national law) into SEP rather than treating them as “the whole engagement”.
5. **Design for vulnerable groups** (PR10 lens): targeted outreach, accessible venues, translation, disability access, trusted intermediaries, separate focus groups where needed.
6. **Report back routinely** (key concerns identified, mitigation measures adopted), and publish engagement summaries and grievance statistics (while protecting personal data).
7. **Insert SEP & GRM obligations into Works contracts**, including: Community liaison officer, toolbox talks on community relations, Incident reporting

3.2.2. EBRD Requirements

Under Performance Requirement 10 (PR10), for Category A projects EBRD clients must:

- Identify stakeholders likely to be affected and engage them in an inclusive, culturally appropriate manner throughout the project life-cycle;
- Disclose relevant environmental and social information in a timely way;
- Conduct two formal consultation stages (scoping and draft ESIA) with a minimum 120-day disclosure period for Category A projects;
- Establish and maintain a Grievance Mechanism accessible to all stakeholders;
- Monitor and report on engagement results.

3.2.3. International Conventions

- **Aarhus Convention (1998)** – guarantees access to environmental information, public participation, and access to justice.

The Republic of Moldova is a Party to the Aarhus Convention, and its provisions are directly relevant to the ESIA

process and stakeholder engagement for the M3 Project. For Lots 1–4 (Chişinău Airport–Porumbrei, Porumbrei–Cimişlia, Cimişlia–Comrat, Giurgiuleşti bypass), the Convention:

1. Guarantees access to environmental information The ESIA disclosure package (ESIA Report, NTS, ESMPs, SEP, LARF) must be made publicly available in an accessible manner.

Information must be provided before decisions are made, ensuring that affected communities (Băcioi, Răzeni, Horeşti, Țipala, Porumbrei, Cimişlia, Ciucur-Mingir, Giurgiuleşti, Cîşliţa-Prut etc.) can meaningfully understand project impacts.

Requires proactive disclosure on: air quality, noise, vibration, soil, biodiversity, community health & safety findings, land acquisition and access restrictions.

2. Ensures meaningful public participation Public consultations must be early, effective, and inclusive, especially for vulnerable groups (elderly, women, low-income households, informal land users, minority communities if present).

The Project's Stakeholder Engagement Plan (SEP) operationalizes Aarhus principles: early scoping meetings, public disclosure events in each district, accessible information boards, web, social media announcements, ability for citizens to submit written comments during the disclosure period (120 days).

3. Provides access to justice in environmental matters Members of the public who believe their rights have been violated (e.g., inadequate disclosure, unaddressed land impacts, environmental degradation) have the right to submit complaints to: the Project grievance mechanism (GRM), national administrative bodies, courts, according to the Administrative Code and PR10/ESR10. This strengthens transparency and accountability for the road authority and contractors.

Aarhus ensures the ESIA for M3 Lots 1–4 is: publicly available, participatory, transparent, rights-based.

- **Espoo Convention (1991)** – requires transboundary notification and consultation; relevant for the Giurgiuleşti–Galaţi and Galaţi – Reni border area.

While much of the M3 alignment is inland, Lot 4 (Giurgiuleşti–Port/Galaţi/Reni area) lies in a tri-border zone between Moldova, Romania (EU), and Ukraine, which activates Espoo provisions when a project may cause transboundary impacts.

1. Transboundary notification obligations. The road corridor at Giurgiuleşti connects directly with: Galaţi (Romania) across the Prut River, Reni (Ukraine) across the Danube. Given the proximity (0.5–1.5 km) to both borders, the following may be affected: traffic volumes at border points, noise and vibration affecting settlements across the border, air emissions and dust dispersion, potential impacts on the shared Danube–Prut wetland systems, Natura 2000 sites in Romania, and transboundary water bodies.

Therefore, Moldova may need to inform Romania and Ukraine about: the scope of rehabilitation, potential transboundary risks, expected traffic increases, mitigation measures.

2. Opportunity for neighbouring states to comment Romania and Ukraine may: review the ESIA conclusions, request clarification on cross-border impacts, participate in transboundary consultations (often done through ministries, not local events).

For Lots 1–3, located far from the border (Chişinău–Comrat), indirect impacts do not typically trigger Espoo requirements.

However, traffic redistributed to the southern border crossings may still be noted, even if no formal notification is necessary.

In practical terms, for M3 Lot 4 the Espoo Convention ensures: cross-border transparency, protection of shared

environmental receptors (Prut/Danube ecosystems), alignment with EU neighbouring procedures for significant infrastructure projects.

3.3. Stakeholder Identification and Mapping

Stakeholder engagement is essential for ensuring that the M3 Road Tranche 2 Project reflects community needs and manages potential environmental and social impacts effectively.

This section identifies the parties affected by or interested in the Project and explains how they were identified.

Stakeholder identification, analysis, and mapping were conducted using a combined desk review and participatory validation workshop on 29th of August 2025 in a meeting organized with the National Road Administration.

3.3.1. Methodology

Stakeholders were identified through:

- Review of project design documents, previous feasibility studies, and ESIA scoping information;
- Consultation with NRA, MIDR, local authorities, and the consultation with the other consultant responsible for the review of the technical design;
- Field reconnaissance (site visits) and analysis of socio-economic data within the Area of Influence;
- Preparation of an interest–influence matrix to determine engagement priority.

This process follows EBRD PR10 and the approach outlined in the *EBRD Guidance Note on Stakeholder Engagement (2012)* and *EBRD Guidance Note on Information Disclosure and Stakeholder Engagement (2023)*.

The stakeholder list is a living document and will be reviewed and updated throughout the ESIA, construction, and operation phases.

Categories of Stakeholders	Role	Level of Analysis (high, medium, low)	
		Interest	Influence
I Affected parties			
MIDR, NRA/PIU	Lead institutions responsible for planning, implementation, supervision, procurement, coordination with financiers, and ensuring compliance with national legislation and EBRD requirements.	H	H
LPA (Local Public Administration) (Mayors, Local Councils)	LPAs administer the territories where construction impacts occur (noise, dust, detours, access restrictions). They face increased administrative workload during land acquisition, grievance management, and community coordination. Local infrastructure under LPA responsibility (local roads, bus stops, utilities) may be temporarily affected or require adjustments. LPAs must respond to citizen concerns and ensure continuity of local services during construction.	H	H
Directly affected by Project parties (by land acquisition, changes to access etc.)	Provide land access, receive compensation, report impacts on property or livelihoods; critical for timely land acquisition, access management, and ensuring socially acceptable solutions.	H	M
Businesses located in the project area (roadside shops, services, industries)	May experience temporary access restrictions or loss of visibility; beneficiaries of improved connectivity after construction; important in discussing phasing, detours, and business continuity.	H	M

The residents of communities	Main users of the road; provide inputs on safety, access, noise, dust; help identify vulnerable groups and informal access routes; essential in social baseline and Community Health and Safety assessment.	H	M
Transport Operators (public transport, freight, taxis)	Important in traffic management planning	H	M
II Interested Parties			
CBP (Cross Border Points, Giurgiulesti-Reni, Giurgiulesti- Galati) for Lo4	Ensure continuity of cross-border mobility, coordinate customs flows and security; key for regional connectivity and logistics planning.	H	M
Ministry of Internal Affairs, Ministry of Environment, Ministry of Health	Issue authorisations and permits; oversee compliance with environmental, public safety, and health standards; participate in emergency response and monitoring.	H	H
LPA (Local Public Administration)	LPAs act as key partners for information dissemination and organisation of public consultations. They represent community interests and facilitate communication between residents and the Project. LPAs provide essential local knowledge for design optimisation, RSA updates, and land-use planning. They coordinate with central authorities and contractors on permits, safety, utilities, and traffic management. Project outcomes benefit LPAs through improved mobility, safety, and economic development opportunities.	H	H
Project Designers/Engineering Teams	Prepare designs, incorporate RSA and ESIA recommendations, optimise junctions, drainage, and safety facilities.	H	M
National & Local Specialised Authorities (Environment Agency, Public Health Centre, Forest Agency, Water Authorities, Police Inspectorate)	Provide approvals, technical oversight, monitoring, environmental and health inspections, and ensure compliance with sector-specific regulations.	H	M
Mass media and CSOs	Communicate project information, increase transparency, provide public oversight, raise community concerns, support environmental/social monitoring.	M	M
Consultants and Contractors	Implement works, mitigation measures, OHS, CHS, traffic management, environmental compliance, community liaison.	H	M
III Vulnerable Groups			
Women and female-headed households	High exposure to access restrictions, safety risks, transport reliability; essential for inclusive consultations.	H	L
Elderly persons	Sensitive to noise, vibration, reduced mobility, changes in access to health and social services.	H	L
Persons with disabilities	Require safe crossings, accessible transport, clear signage, and uninterrupted access to services.	H	L
Low-income or unemployed households	Higher vulnerability to disruptions in public transport, informal livelihoods, and increased travel costs.	H	L
Ethnic or linguistic minorities (Gagauz, Roma, Russian speakers)	May face linguistic barriers during consultations; require tailored engagement strategies.	H	L
Children, students, at home and at education facilities	Sensitive to air/noise impacts and road safety risks; priority group for Community Health and Safety measures around schools and bus stops.	H	L

Table 3-5: Analysis and Prioritization of Stakeholder Groups based on Level of Interest and Influence

3.3.2. Internal and External Stakeholders

- Internal stakeholders – institutions directly responsible for project preparation and implementation (MIDR, NRA, contractors, consultants, supervising engineers).
- External stakeholders – individuals, groups, or organisations affected by or interested in the Project, including communities, LPAs, NGOs, media, and businesses.

3.3.3. Stakeholder Categories

The following table summarises the main categories of Project-Affected Parties (PAP), Interested Parties and Implementation Stakeholders, potential impacts, and risks of exclusion from engagement.

Stakeholder Group	Potential impacts / Interests	Risk of exclusion or engagement risk
Residents of settlements along M3 corridor	Temporary disturbance (noise, dust, restricted access); improved connectivity post-construction	Limited access to information; language or mobility barriers
Road Users (drivers, public transport operators, commuters, Freight transport operators)	Temporary traffic delays, detours, reduced speed limits, and safety risks during construction, improved travel time, safer road geometry, upgraded junctions, and enhanced connectivity in operation phase	Insufficient or delayed communication on traffic restrictions, detours, and road closures, operational disruptions, limit reporting of safety concerns
Landowners and farmers	Temporary and permanent land occupation or damage to crops; access disruption	Delayed or unclear compensation information
Businesses and roadside enterprises	Reduced access or visibility during works; increased traffic post-completion	Inadequate notification of construction phasing
Vulnerable groups (women, elderly, low-income, disabled, minorities, children)	Disproportionate access or safety risks; exclusion from decision-making	Low participation due to physical, linguistic or economic barriers
Local Public Authorities (LPAs)	Oversight of community interests; coordination with NRA and contractors	Overload of administrative responsibilities; inconsistent communication
Regional / District representatives (police, environment, forest, roads, public health, etc.)	Local agencies and services will conduct external monitoring of the project's implementation to ensure its compliance with local legislation and requirements.	Limited coordination and inconsistent engagement among local agencies, which may lead to gaps or overlaps in external monitoring, delayed information sharing, and uneven enforcement of legal requirements
Educational & health institutions	Noise, dust, or restricted access for pupils and patients	Not targeted in consultation schedules
Ministry of Environment, Ministry of Health, Ministry of Internal Affairs	External monitoring will be conducted to ensure compliance with legislative requirements and standards. This includes the issuance of permits and licenses for activities that require them.	Delayed or limited technical engagement, insufficient integration of public health considerations, incomplete coordination on traffic safety and emergency response
Utility & emergency services	Service interruptions, limited access for emergency response	Lack of coordination in works planning
Contractors / Workers	Interaction with local residents; workplace safety	Poor communication or overlapping responsibilities
Civil society & NGOs	Monitoring environmental and social performance; advocacy for transparency	Insufficient engagement or information flow
Media & local press	Dissemination of public information and alerts	Inconsistent or delayed updates
National Road Administration	Project Implementation Unit	Insufficient coordination and timely

Stakeholder Group	Potential impacts / Interests	Risk of exclusion or engagement risk
		engagement with affected communities and institutions, where high workload, limited staffing, or competing project priorities may reduce the PIU's ability to provide consistent information, address grievances promptly, and ensure inclusive participation in decision-making
Government of the Republic of Moldova, Ministry of Infrastructure and Regional Development	Attracting investments to modernize the road network and improve logistical capabilities in the Republic of Moldova through the modernization of existing infrastructure and the creation of new transportation corridors.	Limited high-level coordination and slow decision-making, where competing national priorities or administrative delays may affect timely approval of project requirements, land acquisition decisions, and policy-level support for stakeholder engagement
Donors / Financiers (EBRD, EU Delegation)	Project compliance, visibility, and reputation	Limited timely reporting of social issues

Table 3-6: Overview of stakeholder groups

*Note: Detailed stakeholders register and contact data are provided in **Annex B – Stakeholder Register and Contacts***

3.3.4. Integration with the Project Cycle

Stakeholder engagement is integrated into key decision-making points (Project stage - Scoping, draft ESIA disclosure, Project Implementation - construction, operation) as detailed in the Figure 3-2. Consultation will be adapted to each phase's objectives, ensuring that feedback from communities and institutions informs design and management measures.

Under EBRD PR10 (ESP 2019) and Guidance Notes (2012, 2023), the main approach on stakeholder engagement is meaningful consultation which represent a two-way, inclusive and ongoing process through which project stakeholders — especially those affected by the project — are provided with timely, relevant, understandable and accessible information and are given genuine opportunities to express their views and concerns. It requires that consultation is free from coercion, intimidation and retaliation, is proportionate to the project's environmental and social risks and impacts, and is tailored to the needs of different stakeholder groups, including vulnerable and disadvantaged people. Crucially, meaningful consultation goes beyond formal disclosure or public hearings: it ensures that stakeholder feedback is actively considered and integrated into project planning, design, mitigation measures and decision-making throughout the project life cycle, with clear feedback provided on how stakeholder inputs have influenced outcomes.

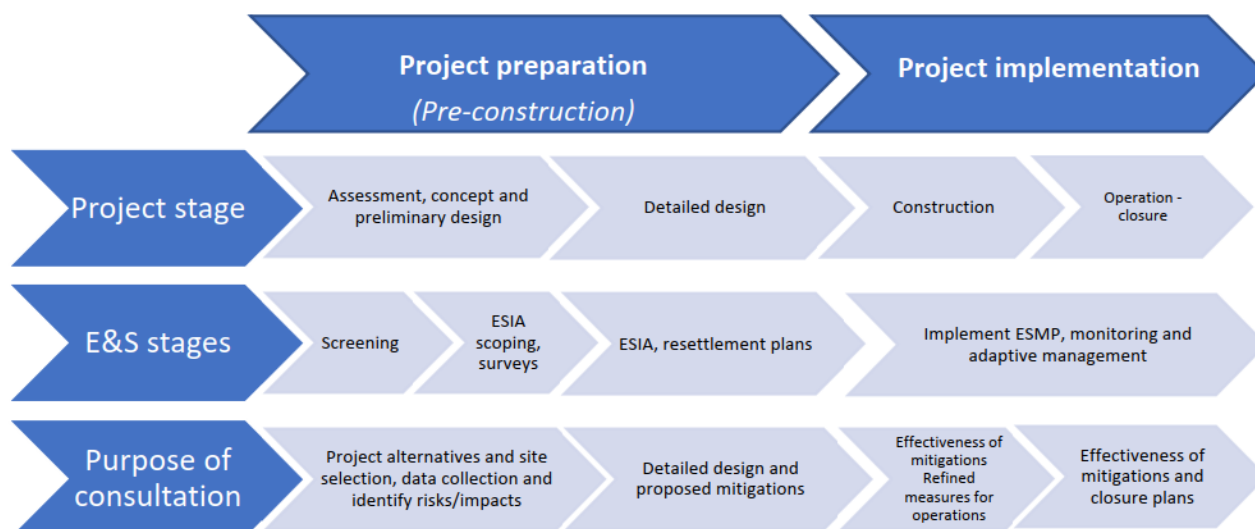


Figure 3-3: Stakeholder engagement during the project cycle

3.3.5. Methods of consultation during the entire project lifecycle

Engagement methods will be tailored to the stakeholder group and stage:

Engagement Methods	Purpose/Description
Electronic publications	On-line publications as announcements, invitation to public consultations (publication 10 days earlier before consultations) are available on web-platforms of lead stakeholders, NRA/PIU and LPA (Local Public Administration) and social platforms as Facebook/Viber to assure a more transparent communication with communities. The links to on-line publications of stakeholders used for scoping consultation are specified in the paragraph 5.3.2
Media releases	The press and media outlets used will raise awareness of the availability of the above documents during each stage of the Project, including links to the PIU's website where the documents will be available electronically. The press and media outlets shall also be used to inform people where physical copies of the documents are, so that they can comment on them, and also physically attend meeting venues when these are organized and the actual date, time and location is known.
Public meetings and hearings	The disclosure of information should support consultation. Consultation is a two-way process of dialogue between the Project implementation team and its stakeholders. These consultations will be held at least twice per year during lifecycle of the Project and provide opportunity for all citizens to raise issues with NRA/PIU. NRA/PIU will also request communities' feedback on how to make consultations more effective into implementation. The results of such consultations will be documented, agreed with community leaders, and posted on NRA/PIU website.
Workshops	The workshops with experts will be held to consult the revision and development of designs during the preconstruction, construction and operational phase. Also, several workshops with citizen/ stakeholders will be carried out. The main topics of these workshops will be the ways of information and awareness of stakeholders on project benefits, established implementation procedure, timing for project implementation, GRM. Other topics relevant for these workshops will be identified during project implementation.
FGD (focus group discussions)	FGDs help identify local concerns, expectations, site-specific risks, and opportunities, ensuring that the ESIA integrates community knowledge, vulnerabilities, and context-specific mitigation measures. Detailed Focus Group Discussions with communities are presented in paragraph 3.6.3.
Key informant interviews	Targeted stakeholder engagement method to gather expert, experience-based insights from individuals with in-depth knowledge of local conditions, institutional processes, and potential project impacts. They support scoping and impact assessment by providing qualitative information on environmental, social, land-use, health, and governance issues, helping to identify risks, refine mitigation measures, and complement data from surveys and public consultations.
Social Baseline/Land use and Resettlement Questionnaire	Document the socio-economic conditions of households, existing land use patterns, and the presence of any formal or informal land rights. It helps identify potentially affected people, understand livelihood dependencies, and establish the reference point for assessing project impacts, eligibility for compensation, and future resettlement or livelihood restoration measures. Presented in ANNEX A
Leaflets/Informative Notes	Leaflets with information that might present more interest for affected parties, such as the benefits of proposed investments, will be developed and distributed in the meetings/ public consultations/

Engagement Methods	Purpose/Description
	public institutions (LPA, FGD etc.). The leaflets will be available in Romanian/ Russian languages. ANNEX D
Information Boards	Using Information Boards of LPA. On these information boards will be placed the information related to the Project, relevant for every phase of Project implementation.
Letters	The letters will be an instrument used in order to facilitate the Project implementation process through good collaboration between the implementing entities and other stakeholders.
Reports	The reports will be used to monitor the Project implementation and to keep informed the main stakeholders of the Project.
E-mails	To facilitate communication between implementing entities
GRM	GRM will be established in line with the EBRD's PR10 requirements. A dedicated grievance mechanism will be set up for the Project. The stakeholders will be able to raise grievances anonymously by phone or online using the PIU's on-line GRM form.
Grievance Log	Where grievances, including those delivered through the online platform, are registered (including grievance delivered by letter mail or in writing) and maintained, followed up and resolved through a database.

Table 3-7: Overview of the engagement methods

3.4. Vulnerable or Disadvantaged Groups

In the context of the ESIA and in accordance with the EBRD Environmental and Social Policy (2019), vulnerability refers to the reduced ability of an individual, household, or community to anticipate, cope with, resist, or recover from the adverse impacts of a project. Vulnerable groups are those who may experience disproportionate or differential effects during project planning, construction, or operation because of their social status, economic condition, health, age, gender, disability, geographic isolation, or other context-specific factors.

Vulnerability is therefore context-dependent and may vary across the M3 corridor depending on local demographic characteristics, access to services, land dependence, income levels, and exposure to environmental and health risks.

In Moldova, vulnerable groups are identified through multiple national policies, statistical instruments and social protection frameworks, including the National Social Protection Strategy, Law on Social Assistance, Household Budget Survey data, and district-level social service records.

Nationally recognised vulnerable groups typically include: **Elderly persons**, particularly those living alone or in rural isolated households, **Women-headed households and women at risk of GBVH**, **Low-income households**, including those dependent on social allowances, **Children, including preschool and school-aged children**, **People with disabilities or chronic health conditions**, **Large households (5+ persons)** with limited income stability, **Roma or minority groups**, where present (identified through voluntary self-affiliation), **Migrant or remittance-dependent households**, **Households without secure tenure** or informal land users.

3.4.1. Identification method

Vulnerable groups were identified through review of demographic data from LPAs (Local Socio-Economic Development Strategies developed by each community), from the conducted primary data collection - **ANNEX G**, information provided by social assistants, and field observations during site visits. Criteria included gender, age, disability, income, ethnic or linguistic status, and geographic isolation. This approach follows the methodology outlined in EBRD Guidance Note (2012) § 3.3 – Identifying and Engaging Vulnerable Groups.

3.4.2. Vulnerable groups identified and tailored engagement measures

Group	Specific concerns / Potential impacts	Tailored engagement measures
Women and female-headed households	May face safety and mobility risks during construction; limited representation in decision-making	Targeted invitations to meetings; ensure female facilitators and timing compatible with household duties
Elderly persons	Reduced mobility; difficulty accessing information or venues	Use local noticeboards, home visits, and LPA outreach; provide seating/transport to events
Persons with disabilities	Physical access limitations to consultation sites; safety risks at crossings	Ensure barrier-free venues; coordinate with social workers
Low-income or unemployed households	Greater sensitivity to temporary access or income disruption	Deliver information via social assistants; highlight local employment opportunities
Ethnic or linguistic minorities (Gagauz, Roma, Russian speakers)	Language barriers and low trust in institutions	Provide translated materials (RO/RU) and bilingual facilitators; engage community leaders
Children, students, at home and at education facilities	Safety risks from construction traffic near schools	Coordinate awareness sessions with teachers and LPAs

Table 3-8: Overview of the identified vulnerable groups

3.4.3. Meaningful Consultation with vulnerable groups

Findings from this section are integrated into the Engagement Plan and Monitoring Framework to ensure equal participation and follow-up of vulnerable groups during all project phases.

Group	Activity
Vulnerability in the context of planning stakeholder consultation and disclosure activities	
Young people below the age of 18 who may: (1) undertake high-risk activities that older people are less likely to do, such as trying to enter areas where construction works are ongoing; and (2) have a poor understanding of road safety risks and need assistance from adults when crossing roads or walking near to sections of busy roads.	Direct engagement in the schools or administration of the schools from localities which are crossed by M3 route or very close to M3 route (Lot 1-4), prior to the start of construction, to discuss the construction risks during construction, and road safety risks during operations. To be mentioned, that since in some villages schools are closed, due to low number of children in the locality and it became unfeasible to maintain school infrastructure, children are daily transported to the closest vicinity schools from bigger villages.
People with poor health, disabled people including wheelchair users, people who are deaf and/or have a visual impairment and people with reduced mobility who may not be able, or willing, to attend public consultation events.	Engagement through NGOs, civil society groups that focus on the needs of people with additional mobility needs. Vulnerable households are registered and are under supervision of social workers, who are town hall employees and responsible for communication with vulnerable people, to ensure that all household members are aware of the Project, community health and safety risks during construction, and to discuss other topics that are of concern to them.
Ethnic or linguistic minorities (Gagauz, Roma, Russian speakers)	Consultations will be held in accessible, bilingual formats (Romanian / Russian)
Vulnerability in the context of resettlement	
Women and female-headed households	Women and female-headed households identified during RAP surveys and engaged through household-level visits, women-only focus groups, and tailored outreach supported by LPAs and social workers.
Elderly persons	Elderly persons identified during RAP surveys and engaged through household-level consultations, home visits, and small accessible meetings facilitated by LPAs and social workers.
Low-income or unemployed households	Low-income or unemployed households identified during RAP surveys and engaged through household-level visits, door-to-door outreach, and targeted micro-consultations coordinated with LPAs and social workers.
Persons with disabilities	Persons with disabilities identified during RAP surveys and engaged through household-level consultations, accessible one-on-one

Group	Activity
	meetings, and coordinated support from LPAs, social workers, and relevant NGOs.

Table 3-9: Activities to ensure the participation of different groups

3.5. Stakeholder Engagement

This section provides an overview of the stakeholder engagement and information disclosure activities undertaken throughout the development of the M3 Road Rehabilitation Project, beginning with the earliest feasibility studies and continuing through the scoping stage and the Environmental and Social Impact Assessment (ESIA) process. It summarises the sequence of consultations, communications, and participatory mechanisms applied over time, outlining how stakeholder inputs have informed project design, mitigation planning, and decision-making. The chapter also highlights the evolution of engagement practices, the tools used to ensure transparency, and the alignment of all activities with national legislation and the requirements of EBRD Performance Requirement 10 (PR10).

3.5.1. Historic Engagement

The first comprehensive consultation process on entire M3 route was conducted within the Feasibility Study for Rehabilitation and extension of the M3 Road Chisinau-Giurgiulești /Romanian border in 2009, conducted by KOKCS Ingenieure Germany and Universinș SRL Moldova. Participatory public consultations have been carried out with a wide range of stakeholders in the Project area. The consultations were basically conducted in three formats as follows:

- Scoping meetings with a wide range of stakeholders held from 22-23 October 2008 in 3 strategic locations along the project corridor – Cimișlia, Comrat Districts and Giurgiulești village;
- Focus group discussions with a cross-section of men and women in the villages along the proposed road corridors;
- Interviews with key informants including national government officials, local and municipal mayors; officials and staff of national and local development agencies, managers of utility/service companies, nongovernmental organizations and other interested parties. Total of 104 participants were presented at the consultation process.

The Detailed Design for **Lot 1 (Airport I/C Chișinău–Porumbrei, 34.4 km)** — covering rehabilitation of the existing M3 between km 10+000 and km 44+350—was based directly on the 2009 Feasibility Study, and engagement activities were limited to those undertaken for that study. The design prepared in 2014 received the State Ecological Expertise Approval, authorising construction under the environmental legislation in force at the time. Due to subsequent revisions of national environmental requirements, the updated project now requires a new Environmental Permit; however, *no additional meaningful stakeholder engagement has been conducted for this section.* For **Lot 2 (Porumbrei–Cimișlia, 19 km)** — the widening of the existing road from two to four lanes—the section between km 44+420 and km 63+430 was constructed in 2022 as a two-lane road (Phase I), including embankments and bridge structures designed for the future four-lane configuration. Land acquisition was completed during Phase I, and environmental permits for the full four-lane development were obtained prior to works. *The*

Detailed Design for Phase 2 has not yet been developed, and no meaningful stakeholder engagement has taken place for this stage.

For Lot 3 (Cimișlia–Comrat, 12 km)—rehabilitation of the existing M3 route between km 70+350 and km 82+430—neither a Feasibility Study nor a Detailed Design has been prepared to date, and *no engagement activities with local communities have been undertaken.*

For Lot 4 (Giurgiulești bypass and border connection roads, total 6.2 km), the Feasibility Study and detailed design was prepared in 2024. Environmental Permits for Lot 4—0191/401/2024 and 0191/566/2024 — were issued based on preliminary impact assessments and were publicly disclosed on the platforms of the Environmental Agency and project beneficiaries. Consultations were undertaken with the Border Police South District, the Moldova Customs Service, and representatives of Giurgiulești village. However, *no meaningful public consultation with the wider population was conducted*, with engagement limited to local community representatives.

In 2024 public hearings held at Town Hall Giurgiulești with 29 participants, related to Cross Border Point project, where it was raised that there is a stringent necessity to construct bypass of Giurgiulești².

Nr	Question of the Giurgiulești residents	Answer of the Consultant
1	Why is not included in this WB project the construction of the bypass road of Giurgiulesti village (connection of road R34 with M3 approx. 4 km)?	This bypass road is not the subject of this Project. GoM has to decide about approval of that construction and sources of finance. The MRCP will pay attention to the associated infrastructure that can impede or help to target the scope of the project for better rural and regional connectivity.
2	If the local roads, on the territory of Giurgiulesti, will be used by heavy trucks and machinery, we insist the local roads affected by truck transit be rehabilitated accordingly	Yes, may be possible. But using of local roads for transportation of materials and transit is subject of approvals by engineer and Local Public Administration. local public administration can set up conditions for rehabilitation after using local roads to their original state, limit access times, and prohibit going to certain streets.
3	We encourage the speeding up of the construction of the village bypass road and, in addition, the examination of the road leading to the port as a road variant for customs access to BCP. What will be the width of the bypass road?	This bypass road is not the subject of this Project. Will be probably 2 lanes (7 m of carriage way). GoM has to decide about approval of that construction and sources of finance. The MRCP will pay attention to the associated infrastructure that can impede or help to target the scope of the project for better rural and regional connectivity.

Table 3-10: Overview of asked questions

These past activities established the initial stakeholder base for Lot 1-4, and further steps for approach on meaningful stakeholder engagement related to actual SEP.

3.5.2. ESIA Scoping Stage Consultations (Lot 1- 4)

The methodology applied for scoping stakeholder engagement was informed by a comprehensive assessment of contextual factors most relevant to affected and interested parties. The approach considered the current level of advancement of the Detailed Design, the status of environmental permitting processes, the national land acquisition framework and its implementation progress, category of the road (express road), as well as the degree and intensity of community interactions observed along Lots 1–4. These elements collectively shaped the identification of priority topics, stakeholder groups, and the required depth and timing of engagement activities.

Category A projects are required to carry out a formalized, participatory consultation process integrated into each stage of the environmental and social impact assessment (ESIA) process (Scoping Stage and ESIA disclosure package).

² Extract from Public Consultations on **Moldova Rural Connectivity Project (P180153)**

The scoping-stage stakeholder engagement for the M3 Tranche 2 corridor set out to identify who is affected or interested, capture location-specific concerns, and refine the scope of the ESIA. Stakeholders were mapped through an internal workshop on 29th of August 2025 with NRA against two dimensions—degree of impact and level of interest—and grouped as: national ministries and agencies; regional and district authorities; municipal administrations; project-affected communities (residents, landowners, businesses); workers and labour representatives; potential suppliers and contractors; civil society and thematic NGOs; and local press and online media. Detailed Stakeholder Register and Contacts are presented in **ANNEX B**.

The Methods used for Scoping Stage Engagement *EBRD Guidance Note Information Disclosure and Stakeholder Engagement 2023* are detailed below.

Information Disclosure Tools

Announcements were posted by the National Road Administration and by district and local authorities across their websites and social media. Given the prevalence of community Viber and Facebook groups, local administrations also used these channels to reach residents quickly and collect feedback. Where online presence is limited, notices were displayed physically at mayoralty buildings. This multi-channel approach improved reach and ensured that even small or remote communities were aware of the project, upcoming consultations, and the route for questions or complaints. The **A4 Leaflet** used in scoping stage is presented in **ANNEX C – Scoping Stakeholder Detailed Record**

Record

Lots (1-4)	Stakeholder	Published Announcement (on-line)
1-4	National Road Administration	https://www.andsa.md/consultari-publice-anunturi-si-procese-verbale/anunt-cu-privire-la-lansarea-proiectului-de-evaluare-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/
1	Commune Bacioi, Mayoralty	https://bacioi.md/2025/09/12/anunt-cu-privire-la-lansarea-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/
1	District Council Ialoveni	https://il.md/2025/09/10/autoritatile-lanseaza-studiul-privind-impactul-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/
1	Commune Răzeni Mayoralty	https://www.facebook.com/share/p/1CAiHQeqyG/?mibextid=wwXlfr
1	Commune Horești Mayoralty	https://horesti.md/2025/09/10/anunt-7/ https://www.facebook.com/primaria.horesti/
1	Commune Țipala Mayoralty	https://tipala.primarie.md/news/lansarea-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/
2-3	District Council Cimișlia	https://raioncimisia.md/2025/09/10/anunt-cu-privire-la-lansarea-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/ https://www.facebook.com/share/p/14H9NqJReYL/?mibextid=wwXlfr
2-3	City Cimișlia Mayoralty	https://www.facebook.com/share/p/1Ah1ne5PhF/?mibextid=wwXlfr
2	Commune Porumbrei Mayoralty	https://www.facebook.com/share/p/16ZYYWAeFC/?mibextid=wwXlfr
2	Commune Sagaidac Mayoralty	published on the information board in front of the main building of the mayoralty
2	Village Grădiște Mayoralty	https://primariagradiste.md/2025/09/09/anunt-cu-privire-la-lansarea-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/ https://www.facebook.com/share/p/1EjGFhBmeh/?mibextid=wwXlfr
2	Commune Ecaterinovca Village Coștangalia	published on the information board in front of the main building of the mayoralty
3	Primaria Ciucur-Mingir Mayoralty	https://www.facebook.com/share/p/1671UyCEXX/?mibextid=wwXlfr https://ciucurmingir.sat.md/2025/09/09/anunt-cu-privire-la-lansarea-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/
4	District Council Cahul	https://cahul.md/anunt-cu-privire-la-lansarea-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/ https://www.facebook.com/share/p/18uZ8q8izH/?mibextid=wwXlfr
4	City Cahul Mayoralty	https://primariacahul.md/media-category/noutati-si-evenimente/se-lanseaza-evaluarea-impactului-pentru-modernizarea-traseului-m3-

Lots (1-4)	Stakeholder	Published Announcement (on-line)
		chisinau-comrat-giurgiuilesti-frontiera-cu-romania https://www.facebook.com/share/p/19vYq5bgen/?mibextid=wwXlfr
4	Village Giurgiuilești Mayorality	https://www.facebook.com/story.php?story_fbid=3163525133814073&id=100004698518744&mibextid=wwXlfr&rid=h2QM1WBVmaFzI5Ny#
4	Village Cîșlița-Prut Mayorality	https://www.facebook.com/share/p/14Jqox5ZQhF/?mibextid=wwXlfr

Table 3-11: Overview of the published announcement

Multichannel publication demonstrated effectiveness of spreading the information and gather feedback from the residents (63 residents raised concerns regarding actual and recommendations designing the road). Record of feedback (official letters, community requests) are presented in **ANNEX A** which shall be incorporated into the first Annual Environmental and Social Performance Report, to demonstrate how stakeholder feedback is continually being used to improve the overall design and performance of the Project.

Information boards in villages from Aol of the Project, especially in front or inside mayorality buildings are useful and familiar for providing regular updates, notifications and contact or grievance mechanism details to local communities, particularly where information boards are already an established means of information dissemination.

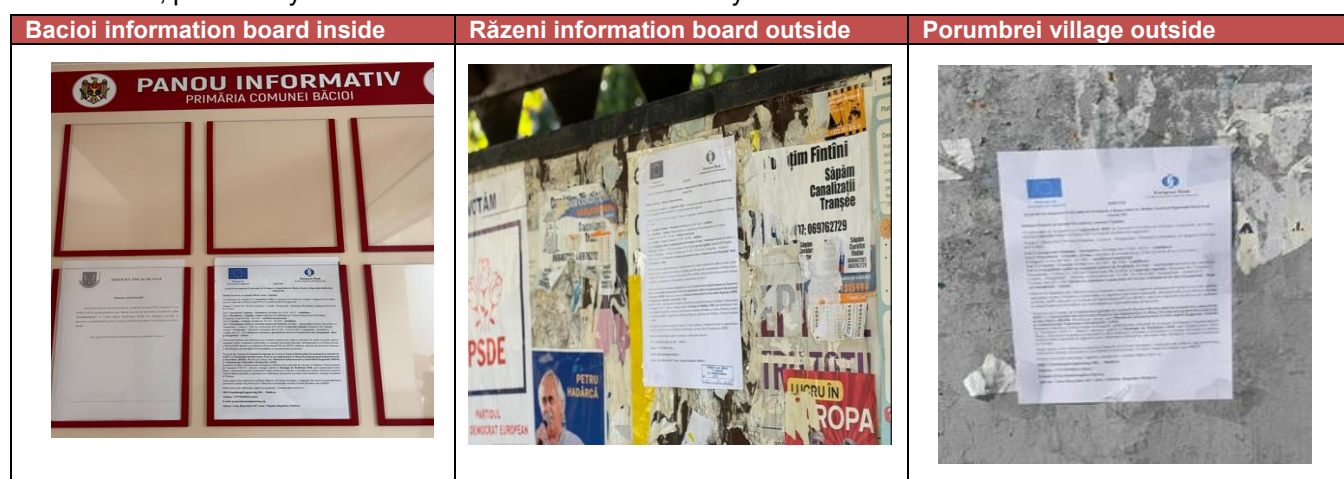


Figure 3-4: Examples of publication on information boards

In-person meetings with Local Representatives and residents of the villages per Lot 1-4

Date	Locality / Stakeholder Engaged	Feedback/Concerns/Issues
28.08.2025	(Lot 1, 2) Porumbrei Village, Mayor	No recent consultations had been held on the current designs and welcomed the scoping dialogue as a chance to align the road works with local development. The commune reported strong diaspora return dynamics (new housing each year), very high gas network coverage, recent wastewater investment and stable school enrolments—indicators of a growing settlement that will benefit from improved access and road safety. The mayor's office committed to provide cadastral extracts to verify land plots potentially affected by widening and to help convene focus groups with farmers and roadside businesses
28.08.2025	(Lot 4) Giurgiuilești Village, Mayor	Safety and access management, Integration with border logistics and regional projects is a priority in the south The mayor and council emphasised the acute need to divert heavy transit flows from the village centre after two decades of burdensome through-traffic. The bypass was widely seen as the single most important improvement for community well-being and safety. Local services are comparatively strong for a small commune (school, kindergarten, clinic, library, museum; broad aqueduct coverage), yet gaps remain—most notably the incomplete sewerage network and a legacy of unmanaged waste that the municipality is working to systematise. The administration offered parcel-level land information for the bypass and confirmed readiness to

Date	Locality / Stakeholder Engaged	Feedback/Concerns/Issues
		coordinate with the Giurgiulești International Free Port and the two cross-border points (Giurgiulești–Galați and Giurgiulești–Reni) so construction logistics and future traffic management are coherent. Local authorities asked that truck parking and staging areas be planned coherently with the bypass, and noted the interface with the Slobozia-Mare bypass now under construction.
28.08.2025	(Lot 4) District Council Cahul, vicepresident	Construction Impacts The administration echoed community concerns, highlighting building cracks and household repair costs attributed to vibration from heavy vehicles, and supported the plan for a truck parking area and logistics improvements near the border to better stage international freight. The district also pointed to a network of regional strategies (water, waste, transport, climate, public health) that should frame the project's mitigation and monitoring.
12.09.2025	(Lot 1) Bacioi village , Mayor	Peri-urban safety and access concerns at junctions and along densely settled frontages Mayor requested a properly designed junction at km 13+243 (accel/decel lanes) to serve a growing residential area, noise barriers along inhabited stretches, and a new turning facility near Străisteni to support the emergent industrial zone.
12.09.2025	(Lot 1) Horești village, Țipala village, Mayors	Safety and access management Horești and Țipala stressed the need to regularise and make safe the access patterns that have evolved over time: businesses and farms rely on multiple informal turn-ins; residents use unsafe U-turns near a fuel station to avoid long detours; and poor night-time visibility contributes to collisions. Both communes asked that all accesses be audited for safety, that lighting be provided at the L465 round junction, and that agricultural machinery movements be explicitly accommodated in design.
18.09.2025	(Lot 1) Răzeni village, Mayor	Safe, signed and lit junctions with accel/decel lanes Răzeni, split by the M3, flagged high crash risk at town entries and the particular danger for pedestrians crossing to the cemetery on the opposite side; the commune advocated full median separation, elimination of at-grade crossing movements, controlled access with acceleration/deceleration lanes (including at km 28 to orchards), and alternative parallel routes for vehicles restricted from an expressway
18.09.2025	(Lot 1) Focus Group Discussion with elderly people (20 participants)	Formal pedestrian solutions where communities or destinations (e.g., cemeteries) lie across the carriageway; and measures to deter cut-through traffic in villages. Răzeni residents reinforced the mayor points and added requests for continuous lighting and formalised crossings.
19.09.2025	(Lot 2) Sagaidac Village, Mayor	Mayor reported good basic access and viewed the 2-to-4 lane expansion as a net benefit for safety and economic links, provided temporary construction impacts are well managed
20.09.2025	(Lot 3) Ciucur-Mingir village, Mayoralty	The administration raised a recurring pattern of drivers diverting through the village at high speeds to avoid monitoring on the mainline, asking for signage and restrictions at the M3 interface to deter cut-through traffic.
18.12.2025	(Lot 3) Ciucur Mingir residents	Were raised 63 concerns regarding road safety of the residents of the village, requesting urgent interventions to repair the access roads to the M3 national route on the grounds that they are not asphalted for a few meters as required by the regulation, but have high thresholds that cause problems for both transport circulation and the movement of citizens.

Figure 3-5: Overview of the in-person meetings

Detailed Scoping Stage engagement is described in **ANNEX C** to SEP, including detailed feedback.

Individual in-person individual with businesses along the roadside: Lot 1 Examples



Figure 3-6: Pictures from in-person meetings with businesses

Site visits and targeted site visits with mayors were conducted as a key engagement method to directly identify social receptors, observe local conditions, identify the principal concerns of residents within the Project's Area of Influence, and gather context-specific feedback related to the proposed road rehabilitation and new construction works. These visits enabled the Project team to validate community priorities, assess potential impact pathways, and integrate locally informed insights into the ongoing design and planning process.

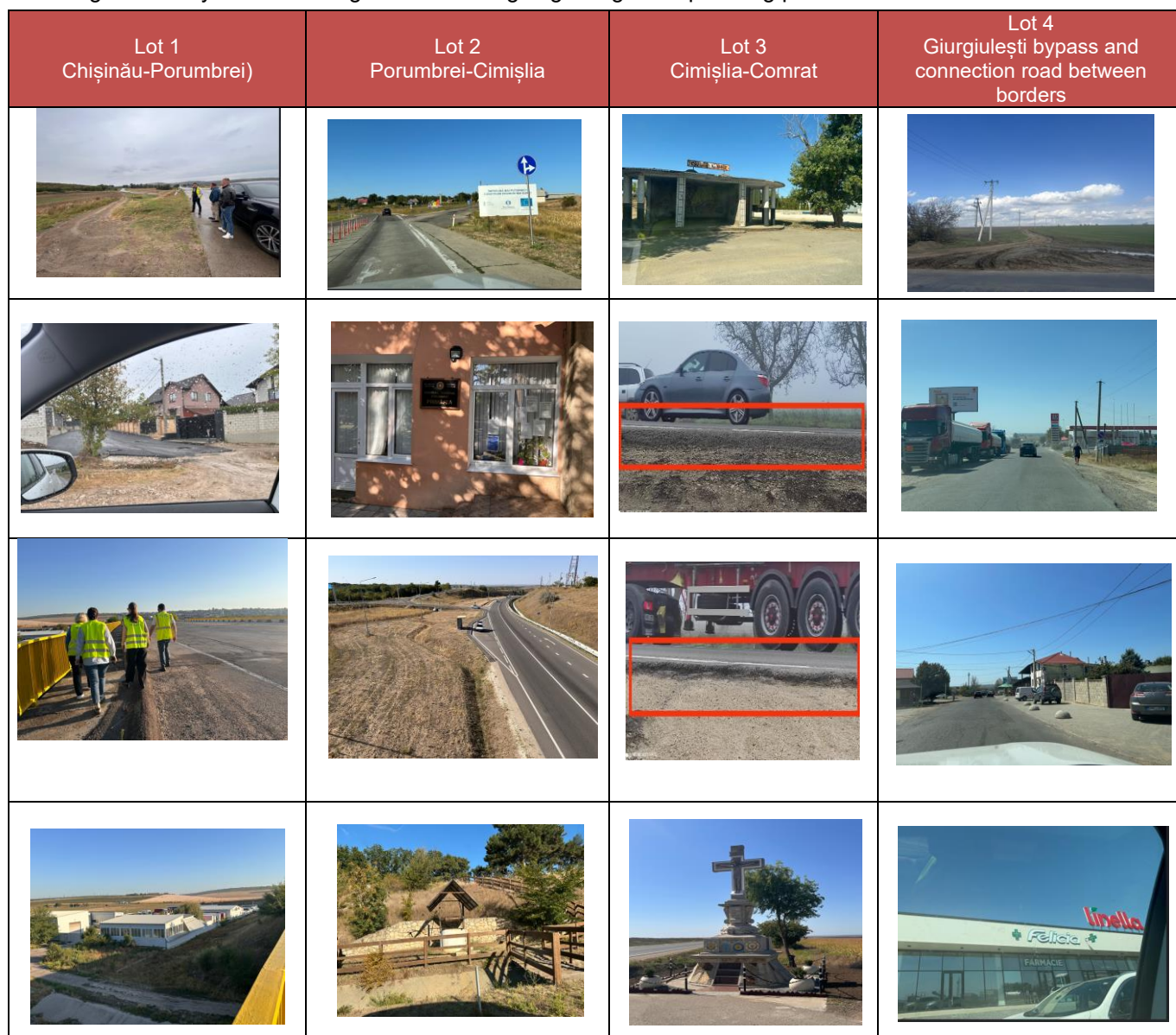


Figure 3-7: On-site visits of the different Lots

Workshops with NRA, ANTA to discuss organization of the road project in terms capacity and capability, policies and management systems in place, current compliance with the EU policies and strategies, future programs. Organization of works for the proposed project (management / oversight of contractors for construction work, management of labour), management of environmental and social impacts, stakeholder engagement and management of grievances (labour, communities), management of land displacement and compensation, past legacies, monitoring, reporting and communication, Road Safety Audits performance.

29 th of August 2025 NRA	21 st of October 2025 NRA	21 st of October 2025 ANTA
		

Figure 3-8: Meetings with the NRA

The engagement also outlined the grievance redress mechanism (GRM) to be operated through the National Road Administration. Core design principles were presented: accessible and free to use; available in Romanian and Russian with male and female contact points; accepting anonymous submissions; providing acknowledgement within seven working days; and allowing escalation to independent mediation or the courts at any time. Special provisions were highlighted for land acquisition and resettlement contexts (advance distribution of leaflets before surveys and at valuation disclosure; field presence to explain options; and recording of grievances centrally to allow trend analysis and timely corrective action). The GRM will be tied to contractor complaint logs during construction and integrated with the NRA/PIU reporting system, with periodic public summaries to build confidence in responsiveness.

During the Scoping phase for the M3 Road Rehabilitation Project (Lots 1–4), a targeted **media search** was conducted to complement stakeholder identification and understand the public discourse surrounding the project. The review focused on national and local news outlets, official institutional websites (Customs Service, ANDSA, MIRR), EU/CEF communications, and public consultation platforms.

The purpose of this media scan was to: identify **community concerns, expectations, and perceptions**, particularly around the Giurgiuleşti bypass and adjacent border infrastructure; track **ongoing institutional consultations** relevant to road rehabilitation, land needs, and customs infrastructure; identify **projects or initiatives linked to or influencing M3 Lots 1–4**, such as border modernisation, TEN-T extensions, or public procurement plans; provide contextual background to inform the ESIA's stakeholder engagement strategy.

The findings showed that media coverage is strongest for the **Giurgiuleşti–Galaţi–Reni border area** (Lot 4), where community expectations and EU-funded initiatives receive significant attention. Local voices reflect concerns about traffic, safety, noise, and the timeline for bypass construction. Institutional portals (Customs Service, NRA) highlight procedural consultations, design and land needs, and coordination with EU programmes such as the CEF.

A summary of the articles reviewed is presented in the ANNEX C.

From this scoping-stage engagement, key issues emerged that will shape the ESIA and design process.

Nr.	Key issues in scoping stage engagement
1.	Road safety and access management dominate community concerns in Lot 1, Lot 3 and in Giurgiulești: for Lot 1 stakeholders seek full median separation to prevent at-grade conflicts; safe, signed and lit junctions with accel/decel lanes; formal pedestrian solutions where communities or destinations (e.g., cemeteries) lie across the carriageway; and measures to deter cut-through traffic in villages, for Lot 3 stakeholders seek interventions to repair the access roads to the M3 national route as the actual situation creates road safety issues and restriction signages, residents from Giurgiulești are expecting the bypass of Giurgiulești over 20 years and regarding road between borders the most concern refers to truck parking.
2.	Land and cadastral clarity is essential: several mayoralties committed to provide parcel lists to support a transparent PR5-compliant process, but asked for early, property-level engagement to avoid misunderstandings.
3.	Construction impacts must be tightly controlled—dust, noise, night-time lighting, work hours, temporary diversions, and access to farms and small businesses—backed by a clear liaison function so problems are fixed quickly on site.
4.	Biodiversity and protected areas require a structured PR6 approach: seasonal surveys, buffers and timing restrictions near Emerald sites and the Lower Prut wetlands, and early dialogue with reserve managers to align works with conservation priorities.
5.	Integration with border logistics and regional projects is a priority in the south: local authorities asked that truck parking and staging areas be planned coherently with the bypass, and noted the interface with the Slobozia-Mare bypass now under construction.
6.	Communication and inclusion matter: residents want regular, plain-language updates; vulnerable groups need targeted outreach; and community feedback should be visible in design refinements. Finally, several local administrations highlighted noise as a medium-term operational concern and requested barriers where settlements about the carriageway.

Table 3-12: Key issues mentioned in the engagement in the scoping stage

Overall, scoping engagement confirmed strong support for the project's objectives, provided that design explicitly addresses local safety hotspots, land and access realities, and ecological sensitivities. The ESIA will carry these priorities forward by (i) focusing the road safety audit on the named junctions and frontage risks; (ii) applying PR5 good practice to land acquisition with early parcel-level dialogue; (iii) formalising construction controls and a site-level community liaison function; (iv) delivering a PR6-aligned biodiversity assessment with seasonal fieldwork and works timing plans near Emerald and wetland receptors; and (v) operationalising the GRM with clear service standards and public reporting. These steps will ensure that stakeholder inputs are translated into practical measures, reducing risk and enhancing the net social and environmental performance of the M3 Tranche 2 investment.

3.5.3. Engagement conducted for ESIA

Between 10–26 February 2026, the Project Implementation Unit (NRA) and ESIA consultants conducted a comprehensive stakeholder engagement and baseline socio-economic survey campaign across all settlements within the Area of Influence (AoI) of M3 Lots 1–4. Activities aligned with EBRD Performance Requirement 10 and Moldovan legislation on public consultation and access to information.

Engagement covered all AoI communities from Lots 1–4, including Băcioi, Străisteni, Răzeni, Horești, Țipala, Porumbrei, Sagaidacul Nou, Sagaidac, Ecaterinovca–Coștangalia, Grădiște, Cimișlia City, Ciucur-Mingir, Cîșlița-Prut and Giurgiulești.

Over 350+ participants attended community meetings and more than 160 household surveys were conducted.

Across all localities, a standardised and multi-modal engagement approach was applied, ensuring inclusiveness and accessibility:

Public Announcements and Information Disclosure

Online publication of consultation notices on NRA and mayorality websites, *Information boards* posted at mayorality buildings and local platforms, *Leaflet distribution* including Project description, maps, and GRM instructions.



Consultări publice privind Proiectului de
Evaluare a Impactului de Mediu, Social și
Siguranță Rutieră pe traseul M3

05/02/2026

Primăria com. Băcioi aduce la cunoștința publicului
organizarea unei consultări publice privind Proiectului
de Evaluare a Impactului de Mediu, Social și
Siguranță Rutieră pe traseul...

Figure 3-9: Examples of public announcements and information disclosure
Community Meetings and Focus Group Discussions (FGDs)

Conducted in every locality, ensuring open participation of residents, landowners, farmers, businesses, and social institutions. Used to present Project scope, expected impacts, preliminary design features, and the ESIA process.



Figure 3-10: Pictures from the community meetings and FGDs

Baseline Socio-Economic Survey

Household-level structured questionnaires implemented in all localities (Lot 1–4), covering: Demographics, income, employment, Access to services, Road safety exposure, Community health and safety, Vulnerability, Land use, assets and previous acquisition experience.

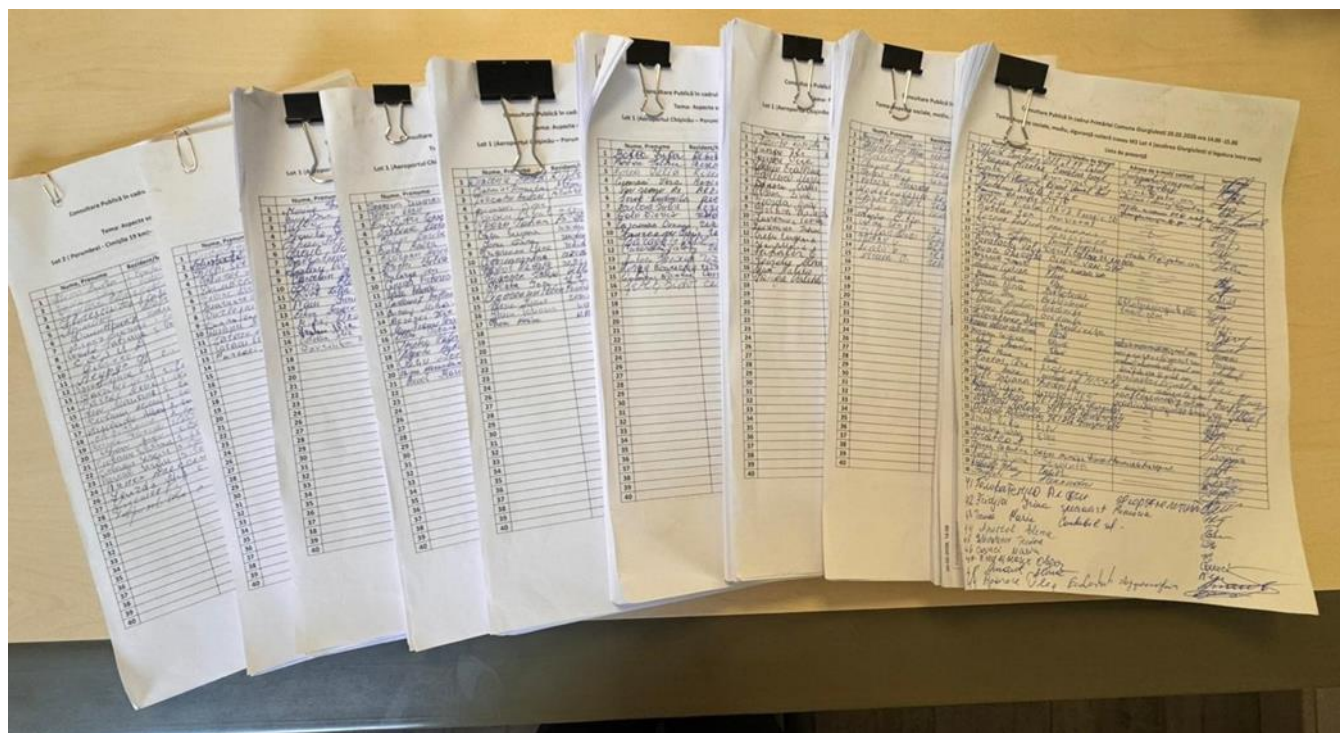


Figure 3-11: Example of filled-in questionnaires

During the ESIA scoping stage, baseline environmental and socio-economic conditions were established primarily using secondary data sources, including official statistics, existing studies, and administrative records. While these sources provided a robust initial understanding of the project context, certain data gaps were identified, particularly in relation to site-specific and community-level socio-economic conditions. To address these gaps and strengthen the evidentiary basis of the assessment, a targeted baseline survey was undertaken before the ESIA public disclosure period. The survey generated primary, up-to-date data from project-affected communities and will be used to validate, refine, and complement the findings of the scoping-stage assessment. This survey served both as a data-collection tool and as a consultation instrument, allowing affected communities to provide direct input into the assessment process. The result of this survey was fully integrated into the ESIA document, ensuring a comprehensive and proportionate assessment of potential impacts in line with EBRD Performance Requirement PR10 and PR1. Draft of Baseline Questionnaire/Survey is presented in **ANNEX A** and a comprehensive leaflet will follow the engagement **ANNEX D**.

Lot	Communities /Key Stakeholders	Engagement and Primary Data Collection	Proposed Type of Engagement	Responsibilities	Link to publication	Participants
All	NRA	10-26 February 2026	Baseline Survey and Community Engagement	ESIA Consultants/ NRA	https://www.andsa.md/consultari-publice-anunturi-si-procese-verbale/anun-cu-privire-la-organizarea-consult-rilor-publice-privind-proiectului-de-evaluare-a-impactului-de-mediu-social-i-siguran-rutier-pe-traseul-m3/	On-line Announcement
Lot 1	Băcioi commune	10 th of February	Community meeting, FGD landowners near	ESIA Consultants/	https://bacioi.md/2026/02/05/consultari-	Community Engagement -

Lot	Communities /Key Stakeholders	Engagement and Primary Data Collection	Proposed Type of Engagement	Responsibilities	Link to publication	Participants
	with villages Străisteni, Frumușica, Brăila	2026 11.00-12.00	M3 ROW and roadside businesses, FGD with Vulnerable People, Baseline survey, Leaflet presentation with Project Information and GRM	NRA	publice-privind-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranța-rutieră-pe-traseul-m3/	22 participants, including landowners FGD with women – 12 participants Surveyed – 25 residents
Lot 1	Răzeni commune with Milestii Noi village	10 th of February 2026 14.00-15.00	Community meeting, FGD with farmers/land users and businesses near M3 ROW, FGD with women (vulnerable groups), Baseline survey, Leaflet presentation with Project Information and GRM	ESIA Consultants/ NRA	https://www.facebook.com/share/p/1aqY4W3Jx/?mibextid=wwXlfr	Community Engagement - 23 participants FGD with women – 10 women Surveyed – 16 residents
Lot 1	Horești commune	11 th of February 2026 10.00-11.00	Community meeting, FGD with agricultural landowners and businesses near M3 ROW, FGD with vulnerable people, Baseline Survey Leaflet presentation with Project Information and GRM	ESIA Consultants/ NRA	https://www.facebook.com/share/p/18RPHiX66r/?mibextid=wwXlfr https://horesti.md/2026/02/05/520/	Community Engagement - 23 participants, including farmers and RoW businesses. FGD with women – 10 women Surveyed – 10 residents
Lot 1	Țipala commune with Budăi and Bălțați villages	11 th of February 2026 13.00-14.00	Community meeting, Meeting with LPA social assistant and FGD with vulnerable groups, Leaflet presentation with Project Information and GRM, Baseline Survey	ESIA Consultants/ NRA	https://tipala.primarie.md/events/consultari-publice-proiectul-de-evaluare-a-impactului-pe-traseul-m3/	Community Engagement - 16 participants FGD with women – 8 women Surveyed – 11 residents
Lot 1	Porumbrei commune with Sagaidacul Nou village	17 th of February 2026 11.00-12.00	Joint Lot 1–2 session, Community meeting, FGD with landowners of past Phase 1 land acquisition, Leaflet presentation with Project Information and GRM, Baseline Survey	ESIA Consultants/ NRA	https://www.facebook.com/share/p/1DUPxhecRQ/?mibextid=wwXlfr	Community Engagement - 18 participants, including business representatives. FGD with women – 8 women FGD with elderly – 14 people Surveyed – 15 residents
Lot 2	Sagaidac village	17 th of February 2026 14.00-15.00	Community meeting, FGD with vulnerable households (elderly/women), Leaflet presentation with Project Information and GRM, Baseline Survey	ESIA Consultants/ NRA	published on the information board in front of the main building of the mayoralty and viber group	Community Engagement - 19 participants FGD with women – 7 women, FGD with elderly – 10 people Surveyed – 16 residents
Lot 2	Grădiște village	19 th of February 2026 11.00-12.00	Community meeting, KII with LPA social assistant and FGD with vulnerable groups, Baseline Survey, Leaflet presentation with	ESIA Consultants/ NRA	https://primariagradieste.md/2026/02/10/anunt-cu-privire-la-organizarea-consultarilor-publice-privind-proiectul-de-	Community Engagement - 16 participants FGD with women – 6 women, FGD with elderly – 10 people

Lot	Communities /Key Stakeholders	Engagement and Primary Data Collection	Proposed Type of Engagement	Responsibilities	Link to publication	Participants
			Project Information and GRM		evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/	Surveyed – 16 residents
Lot 2	Ecaterinovca commune with Coştangalia village	19 th of February 2026 9.00-10.00	Community meeting, KII with social workers, Baseline Survey Leaflet presentation with Project Information and GRM FGD focusing on safety (children transported to school in Grădişte)	ESIA Consultants/ NRA	https://primariaecatrinovca.md/	Community Engagement - 28 participants FGD with women – 9 women, FGD with elderly – 11 people Surveyed – 18 residents
Lot 4	Cîşliţa-Prut village	20 th of February 2026 11.00-12.00	Community meeting, FGD farmers & landowners near bypass, Baseline Survey on Land Acquisition and Resettlement	ESIA Consultants/ NRA	https://www.facebook.com/share/p/1DnZY2Yetz/?mibextid=wwXlfr	Community Engagement - 14 participants FGD with women – 5 women, FGD with elderly – 9 people Surveyed – 12 residents
Lot 4	Giurgiuleşti village	20 th of February 2026 13.00-14.00	FGD with businesses, Women's group session, Elderly households' consultation, FGD farmers & landowners near bypass, baseline survey	ESIA Consultants/ NRA	https://www.facebook.com/share/p/14W99A2R9tF/?mibextid=wwXlfr	Community Engagement - 45 participants FGD with women – 20 women, FGD with elderly – 25 people FGD with business – 5 enterprises Surveyed – 29 residents
Lot 2	Cimişlia City (Joint Lot 2-3 sessions)	23 th February 2026 10.30 – 11.30	Community meeting, FGD and Baseline Survey, Leaflet presentation with Project Information and GRM, Baseline Survey	ESIA Consultants/ NRA	https://www.facebook.com/share/p/17jMZ2r9nd/?mibextid=wwXlfr	Community Engagement - 35 participants FGD with women – 18 women, FGD with elderly – 13 people FGD with business – 6 enterprises Surveyed – 29 residents
Lot 3	Ciucur-Mingir village	23 th of February 2026 13.00-14.00	Community meeting, FGD focusing on safety (children transported to schools located near school), Household-level engagement for disabled/elderly groups, Baseline Survey	ESIA Consultants/ NRA	https://www.facebook.com/photo?fbid=2172123426957213&set=gm.1752907182780433&idortvanity=355999019137930	Community Engagement - 24 participants FGD with women – 11 women, FGD with elderly – 15 people Surveyed – 16 residents

Table 3-13: Overview of the engagement activities

Although each locality reflected local-specific issues, several recurring themes emerged across the corridor

Key concerns across communities	Description
Road Safety (Dominant Concern Across All Lots)	Unauthorised accesses and lack of acceleration/deceleration lanes. Irregular manoeuvres by drivers crossing M3 to avoid grade-separated interchanges.

Key concerns across communities	Description
	High incidence of road accidents and near-misses, including cases involving children and cyclists. Lack of protection barriers, unsafe curves, insufficient channelisation. Poor road illumination, especially near settlements, junctions and bus stops.
Mobility of Agricultural Machinery and Quality of Alternative Routes	Farmers consistently reported unsafe use of M3 due to lack of viable parallel roads. Alternative agricultural tracks are muddy, unmaintained and unsafe, especially under bridges.
Noise, Dust and Air Quality	Particularly severe in Băcioi, Răzeni, Giurgiulești and Sagaidacul Nou. Complaints regarding cumulative noise (road + airport, Lot 1)
Business Access and Economic Activity	Businesses requested: Guaranteed direct access or adequate alternative routes. Accel/decel lanes to maintain commercial viability. Avoiding closure of existing entries without prior consultation.
Pedestrian Safety and Public Transport	Missing or unsafe pedestrian crossings (e.g., cemetery access in Răzeni). Unsafe behaviour of public transport operators stopping directly on the M3 (Porumbrei–Sagaidacul Nou). Long walking distances to bus stops (Sagaidac village).
Vulnerable Groups' Risks	Elderly and women highlighted: Fear of construction-period impacts, worker influx, visibility, and unsafe temporary routes. Need for well-lit, safe access, GRM ability to submit complaints anonymously.
Drainage, Flooding and Local Infrastructure	Coștangalia reported flooding during past construction (2020) and fear of recurrence.
Border Area Issues (Lot 4)	Giurgiulești raised: Persistent dust, vibration, and emissions from intensive heavy truck traffic. Need for truck parking and staging areas to avoid congestion. Risks to cyclists and schoolchildren due to trucks parked along roadway.

Table 3-14: Key concerns of the communities

Across all localities, residents expressed strong support for the Project, highlighting expected improvements in safety and connectivity. Commonly proposed measures included:

- **Noise barriers** for settlements located close to the road.
- **Improved illumination** at junctions, bus stops and residential clusters.
- **Parallel/alternative routes** for agricultural machinery and local access.
- **Dedicated pedestrian crossings**, including a second crossing in Răzeni and improvements in Porumbrei/Sagaidacul Nou.
- **Enhanced traffic management during construction**, clear signage and safe access.
- **Continued information flow** from NRA and contractors; functional GRM.

Detailed presentation of community meetings and baseline survey resume in **ANNEX G** to this SEP. A Road Safety Audit (RSA) has been conducted as part of the ESIA package to ensure that the rehabilitation and upgrading of the M3 corridor incorporate internationally recognised safety principles and comply with EBRD PR4 requirements. The RSA forms an integral component of the Project's impact assessment process and assesses the existing road safety conditions, design features, access arrangements, and potential risk factors to all categories of road users—including pedestrians, cyclists, agricultural machinery operators, public transport passengers, and vulnerable groups.

3.5.4. Cross-cutting stakeholder engagement requirements

Stakeholder engagement under **PR10** is a **horizontal (cross-cutting) requirement** that supports the effective implementation of all other EBRD Performance Requirements (PRs). SEP does not operate in isolation—it enables all other PRs to function effectively by ensuring that affected people are informed, consulted, heard, and protected throughout the project lifecycle.

Performance Requirements related to Project:	
PR1: Assessment and Management of Environmental and Social Risks and Impacts	Stakeholder identification and meaningful engagement during ESIA are an integral part of the assessment process; Identification of stakeholders who are disproportionately impacted; Actions to address E&S risks and impacts (as contained in ESMP) to take account of outcomes of stakeholder engagement; Monitoring to address grievances from workers and external stakeholders; Regular reporting to the EBRD on implementation of stakeholder engagement plan (SEP) Additional stakeholder engagement required if material changes arise to environmental and/or social risks and impacts
PR2: Labour and working conditions	Specific requirements on communication with workforce, consultation during collective dismissals and a grievance mechanism for workers;
PR4: Health, safety and security	Specific requirements on stakeholder engagement relating to community health and safety and security providers and on provision of confidential channels to report incidents, where appropriate, when gender-based violence risks are identified
PR5: Land acquisition, involuntary resettlement and economic displacement	Displacement impact assessment process must take into account views of affected people and key relevant stakeholders; Resettlement planning proportionate approach will consider level of stakeholder interest; Stakeholder engagement requirements for resettlement planning, implementation and monitoring phases in accordance with PR10, including: consultation methods to consider vulnerable groups and use of simple, practical, accurate and culturally appropriate documentation. Grievance mechanism for land acquisition and resettlement process, including requirements for a recourse mechanism (also referred to as an appeals process) being available to resolve disputes in an impartial manner;
PR6: Biodiversity conservation and sustainable management of living natural resources	Requirement for stakeholders to be consulted in accordance with PR10 and specifically where project activities impact priority biodiversity features and/or critical habitat.
PR8: Cultural heritage	Specific requirements include meaningful consultation and information provision during identification of cultural heritage (tangible on likelihood of chance finds)

Table 3-15: Overview of requirements for stakeholder engagement

A Land Acquisition and Resettlement Framework (LARF) is being prepared in parallel and this SEP cross-references that document in accordance with EBRD PR5.

3.6. Information Disclosure and Consultation Plan

The purpose of this section is to define how information will be disclosed and consultations carried out during ESIA disclosure, the pre-construction, construction, and operation phases of the M3 Road Tranche 2 Project.

The approach ensures timely, accessible, and inclusive communication in both Romanian and Russian and fulfils the requirements of the EBRD PR10.

The disclosure of the Environmental and Social Impact Assessment (ESIA) for the M3 Road Rehabilitation Project (Lots 1–4) is undertaken in accordance with the requirements of the European Bank for Reconstruction and Development (EBRD) Performance Requirement 10 – Information Disclosure and Stakeholder Engagement, the Environmental Protection Law of the Republic of Moldova, and the national provisions governing public access to environmental information and public consultation processes.

3.6.1. Objectives and Principles

The main objectives of the ESIA disclosure process are to:

- Ensure **transparency** and provide clear, accurate information regarding the Project's potential environmental and social impacts.
- Facilitate **informed participation** of affected communities and stakeholders throughout the Project cycle.

- Provide stakeholders with adequate opportunities to review and comment on the ESIA documentation prior to decision-making.
- Enable the **identification of concerns, risks and expectations** to strengthen impact mitigation and project design.
- Comply with EBRD and Moldovan legal requirements for public participation in environmental decision-making.

All materials and meetings will adhere to EBRD principles of openness, inclusiveness, and accountability.

3.6.2. Documents to be disclosed

The following information will be disclosed electronically and in hard copy:

Document	Purpose
Non-Technical Summary (NTS)	Provide concise, bilingual summary of ESIA findings
Full ESIA (ESMP, ESAP, LARF)	Provide detailed technical and mitigation information
Stakeholder Engagement Plan (SEP)	Describe engagement and grievance process
Grievance Redress Mechanism (GRM)	Explain complaint procedure

Table 3-16: Overview of the documents which will be published

3.6.3. Timing and consultation schedule for disclosure

Draft ESIA stage – disclosure of the ESIA package (with SEP, NTS, LARF, RSA, ESMP, ESAP) for at least 120 days prior to Board consideration (PR10 par 22-26) (before integration of air and noise modelling sampling results):

Lot	Communities/Key Stakeholders	Consultation schedule (indicative)	Type of Engagement	Responsibilities
All	National Road Administration Ministry of Infrastructure and Regional Development	15 th April 2026	Workshop ESIA Package Disclosure Present ESIA findings and mitigation measures. Explain consultation methodology. Confirm LPA responsibilities for local disclosure. Reiterate GRM channels and monitoring requirements.	NRA / MIDR / ESIA Consultants
All	National Road Administration	16 th April 2026	Publish ESIA package, SEP, NTS, GRM procedure on NRA website. Media release + social media notifications. Dispatch disclosure letters to LPAs of all communities Lot 1–4. Confirm venue availability across districts and communities	NRA / MIDR / ESIA Consultants
All	Public Consultations with Communities	April/May 2026 (dates to be confirmed)	Disclosure meetings (see Table 3-18 for more details)	NRA/ESIA Consultants
All	NRA/MIDR	13 th of August 2026	Official End of ESIA Disclosure Period (120 days)	NRA / MIDR / ESIA Consultants
All	Consolidation & Follow-Up	TBC	Stakeholder Feedback Presentation Presentation of consolidated feedback. Explanation of how comments will be integrated in final ESIA.	ESIA Consultants

Lot	Communities/Key Stakeholders	Consultation schedule (indicative)	Type of Engagement	Responsibilities
			Publication of Consultation Summary Report (CSR). Finalize the ESIA Disclosure package for EBRD.	
All	Final ESIA	TBC	Final ESIA package	ESIA Consultants

Table 3-17: Indicative ESIA Disclosure Package

Note: *The ESIA disclosure package already includes the results of the water quality sampling conducted during the baseline phase. Additional environmental baseline parameters—soil quality analyses, ambient air quality measurements, and noise/vibration modelling outputs—are currently being finalised. Once laboratory results and modelling outputs are received, the ESIA documentation will be updated accordingly, and any revisions to the impact assessment or mitigation measures will be incorporated during the disclosure period.*

Disclosure channels during project lifecycle

Disclosure materials will be available:

- On the official websites of MIDR (www.midr.gov.md), NRA (www.andsa.md), EBRD (www.ebrd.com);
- At the offices of Local Public Authorities (LPAs), community centres, and public libraries along the corridor;
- At project information boards at construction sites;
- Through social media and local radio for announcements;

Each consultation event will be publicized at least 10 working days in advance through online and printed notices. During the 120-day disclosure period, the Project will conduct an extensive programme of public engagement across all settlements located within the Area of Influence (AoI). This will include open public hearings organised in the district centres of Ialoveni, Cimişlia and Cahul, followed by community-level meetings in every locality affected by Lots 1–4. In parallel, the Project will hold targeted focus group discussions with women and female-headed households, elderly persons, low-income households, persons with disabilities, farmers and landowners, as well as roadside businesses. Additional consultations will be carried out with relevant institutions, including schools, local mayoralties, emergency services, border police and customs authorities. Each meeting will present the ESIA findings and the functioning of the Grievance Redress Mechanism, and will provide space for discussing mitigation measures, access arrangements, and construction-related traffic, while collecting feedback, concerns and recommendations from stakeholders.

The indicative plan for ESIA disclosure included in the table below:

Lot	Communities/Key Stakeholders	Proposed ESIA disclosure	Type of Engagement	Responsibilities
Lot1	Băcioi commune with villages Străisteni, Frumuşica, Brăila	May 2026	Community meeting, FGD landowners near M3 and roadside businesses, FGD with vulnerable groups	ESIA Consultants/NRA
Lot 1	Răzeni commune with Milestii Noi village	May 2026	Community meeting, FGD with farmers/land users and businesses near M3, FGD with women (vulnerable groups)	ESIA Consultants/NRA
Lot 1	Horeşti commune with Zămbreni, villages	May 2026	Community meeting, FGD with agricultural landowners and businesses near M3, FGD with vulnerable people	ESIA Consultants/NRA
Lot 1	Țipala commune with Budăi and Bălțați villages	May 2026	Community meeting, Meeting with LPA social assistant and FGD with vulnerable groups	ESIA Consultants/NRA
Lot 1	Porumbrei	May 2026	Joint Lot 1–2 session, Community	ESIA

	commune with Sagaidacul Nou village		meeting, FGD with vulnerable groups	Consultants/NRA
Lot 2	Sagaidac village	May 2026	Community meeting, FGD with vulnerable households (elderly/women),	ESIA Consultants/NRA
Lot 2	Grădiște village	May 2026	Community meeting, FGD with vulnerable groups	ESIA Consultants/NRA
Lot 2	Ecaterinovca commune with Coștangalia village	May 2026	Community meeting, FGD focusing on safety (children transported to school in Grădiște)	ESIA Consultants/NRA
Lot 2	Cimișlia City (Joint Lot 2-3 sessions)	May 2026	Community meeting, FGD	ESIA Consultants/NRA
Lot 3	Ciucur-Mingir village	May 2026	Community meeting, FGD focusing on safety (children transported to schools located near school)	ESIA Consultants/NRA
Lot 4	Cîșlița-Prut village	May 2026	Community meeting, FGD farmers & landowners near bypass	ESIA Consultants/NRA
Lot 4	Giurgiuilești village	May 2026	FGD with businesses, Women's group session, Elderly households' consultation, FGD farmers & landowners near bypass	ESIA Consultants/NRA

Table 3-18: Time schedule for disclosure

3.6.4. Engagement schedule and responsibilities during project lifecycle

SEP present key stakeholder's engagement activities to take place during the project preparation stage through to implementation and closure. Additional activities can be included following consultations with project beneficiaries, stakeholders and contractors if these are deemed useful and necessary.

ANNEX F provide a comprehensive Stakeholder Engagement Program to be followed during the lifecycle of the project.

3.6.5. Documentation and feedback integration

All consultations will be documented (minutes, attendance lists, photos, summaries).

Methods for Collecting Feedback

Stakeholders may submit comments through:

- GRM submission forms (online and printed)
- Email and postal addresses of NRA and ESIA consultants
- Registers at mayoralities
- Feedback boxes placed at local administrative buildings
- Direct submission at public meetings

A log of all comments will be recorded and included in the Final ESIA and Consultation Report.

3.7. Grievance Mechanism (GRM)

An effective Grievance Redress Mechanism (GRM) should be established for the M3 Road Tranche 2 Project to enable stakeholders to raise questions, concerns, or complaints related to environmental and social performance, access to land, or other project impacts.

The GRM ensures issues are addressed promptly, transparently, and without retribution, in line with EBRD PR10 par 29 and Moldovan Law No.148/2023 on Access to Information of Public Interest, Law No. 64/2010 on Freedom of Expression (last amended 28.12.2023), Law on Transparency in Decision-Making, No. 239/2008 (last amended

28.10.2016) and GD No. 1467/2016 – Regulation on Public Access to Environmental Information (last amended 18.01.2019).

3.7.1. Objectives

- Provide accessible, transparent, and fair channels for stakeholders to submit complaints;
- Prevent escalation of concerns by resolving them at the lowest possible level;
- Strengthen trust between NRA, contractors, and local communities;
- Record, track, and report grievances consistently throughout the project lifecycle.

3.7.2. Structure and process

The Project applies a three-level mechanism:

Level	Responsible Entity	Description / Timeframe
Level 1 – Site / Contractor / LPA	Contractor's E&S Officer / Secretary of LPA	Receive and register grievance; acknowledge within 7 working days;
Level 2 – NRA/PIU.	NRA Environmental & Social Unit	Review cases; propose solutions, corrective actions; feedback, close case within 30 working days.
Level 3 – Appeal / Independent Review	MIDR or national authorities	Complainant may appeal to Ministry or relevant agency; if unresolved, legal remedies remain available under national law.

Table 3-19: Overview of the process

Anonymous submissions are accepted. The mechanism is free of charge and open to all affected persons, including workers and vulnerable groups.

3.7.3. Submission Channels

Stakeholders may submit grievances through any of the following means:

- In writing (forms available at LPA offices - secretariat, on construction sites – contractor's E&S staff). Forms are presented in ANNEX E
- By email or online form on the NRA web-site (details in table below);
- Verbally during meetings or to designated NRA Department of Sustainable Development and Environment contact person (Ludmila Vîrlan – Environment Specialist – Chief of Department e-mail: ludmila.virlan@andsa.md);
- Via telephone hotline established at the NRA (details in figure below).

All complaints are logged in the Project Grievance Register, assigned a tracking number, and monitored until

resolution.

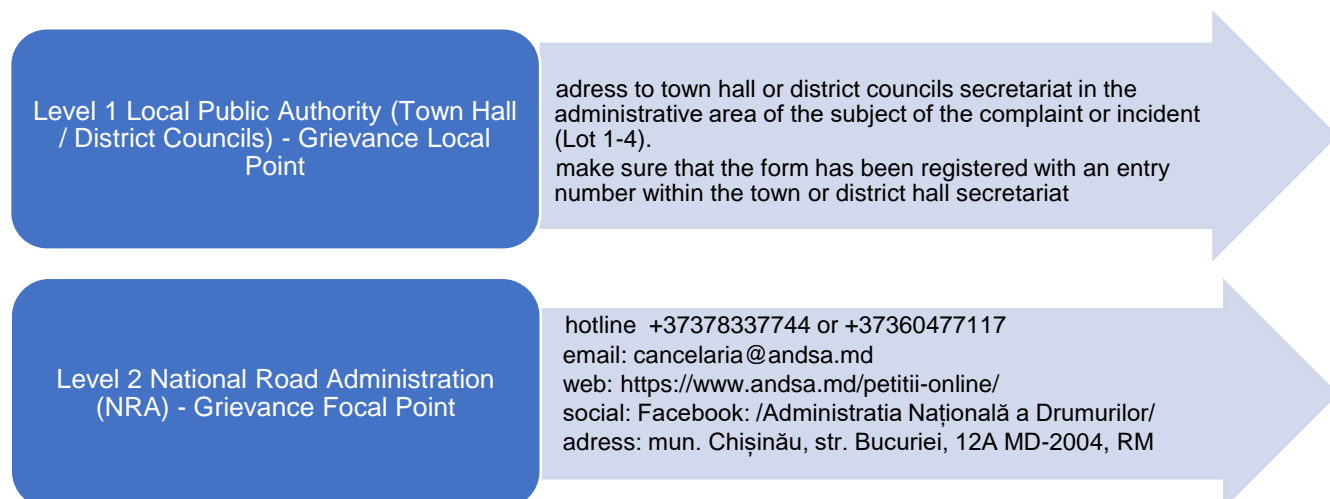


Figure 3-12: Level of grievance

Roles and Responsibilities for GRM

The responsibilities for the management of the GRM system include the following and may be updated from time to time in consultation with NRA and the EBRD task teams.

Level 1. Local level. The secretary and technical supervisor of Local Public Authorities (Mayor Offices and District Councils) will act as **Grievance Local Point (GLP)** will be responsible for collecting the grievance from local residents and contractor's employees. The channels for grievance submission will be disclosed for community in front of mayoralty information board and for workers near the construction site in big board format managed by Contractor. For contractor's employee special grievance box, prepared envelopes (with LGP or FGP stamp) with printed forms and e-mail will be available for submitting grievances (including anonymous). The construction supervision engineer or dedicate E&S specialist will be responsible for collecting grievances from contractors employees. The complaint/grievance will be filed in a template letter of complaint.

Level 2. The NRA will serve as **Grievance Focal Point (GFP)** who will register the submitted grievances in the Grievance Log (database) and review within 30 days, including the information verification, cross-checking, and analysis, and follow-up with the applicant as needed. As necessary, the **Grievance Focal Point** will involve the other relevant units' specialists in this activity.

All the responsible personnel for GRM have to fill the grievance/inquiry template record (**template ANNEX E**) for comprehensive GRM Log.

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

Complaints should be reviewed as soon as they are received and prioritised for resolution. Regardless of general response and resolution time frames, some complaints may require immediate attention – for example, an urgent safety issue or where it concerns damage to a person's property during a survey. There are some complaints that are simple and can be resolved quickly. Many complaints deal with rather minor construction, disruption or nuisance issues or misunderstandings that can be addressed and fixed promptly. grievance mechanisms should provide a framework to resolve such matters quickly, if at all possible and appropriate. These complaints however should still be recorded and the resolution or action taken to resolve them recorded.

3.7.4. Worker Grievance Mechanism

A locally-based project-specific GRM, proportionate to the potential risks and impacts of the project, will be established, building upon existing labour practices and HR procedures. In addition, a GRM specifically for **direct and contracted workers (non-employee workers)** will be provided in accordance with PR2. Contractors as employers are also obliged to establish their own internal grievance mechanism. The GRM will be designed at an early stage and will be formally established by project effectiveness and before any disbursements and start of the civil works. The responsibilities for managing the Grievance Redress Mechanism (GRM) system are as follows, subject to periodic updates through consultations with the PIU, and EBRD teams. In cases related to labour grievances, the **Construction Supervision Engineer** via **E&S Specialist/Communication Officer**, the **State Labour Inspectorate (ISM)**, and for foreign-specific cases, the **General Inspectorate for Migration**, may be involved as third parties by NRA.

Implementing the GRM for employee procedure:

Key requests on worker GRM	Description
The process is transparent, impartial and confidential	Every complaint should be treated seriously and be dealt with consistently in an impartial, confidential and transparent manner. This builds the legitimacy of the mechanism among workers and ensures it will be used. While the procedure may specify that a grievance should first be made to the employee's line manager, there should also be the option of raising a grievance first with an alternative manager, for example, an HR manager to avoid retaliation. The ultimate oversight of grievance resolution procedures should rest with a single senior staff manager (not junior staff). The name of this individual should be communicated to workers. Having the appropriate level of management involved makes it clear that the organization takes worker grievances seriously. The process for filing a grievance must be simple and easy to understand and clearly prohibit any kind of reprisal against workers who file grievances, including those relating to sexual harassment. Without adequate safeguards in place, there are risks of stigmatization and reprisals against workers who make allegations of sexual harassment.
Staff and management are informed and aware	All staff should be made aware of the grievance mechanism at the time of hiring. Details of how it operates – including up-to-date contact points – should be readily accessible (for example, in staff handbooks and on notice boards). All communications about the grievance mechanism should be in a language that workers understand
Concerns are addressed promptly	Procedures should allow for time to investigate grievances fully, but should aim for swift resolution. The longer a grievance is allowed to continue, the harder it can be for both sides to get back to normal afterwards. Time limits should be set for each stage of the process, such as a maximum time between a grievance being raised and a meeting being scheduled to investigate it
Records are kept	Once a grievance has been raised formally, it is important that proper written records are kept, so as to aid transparency and allow for any review of the process or decision to be undertaken. If possible, the original complaint should be in writing. The employer's response should also be recorded. Any actions taken, as well as the reasoning, should also be recorded, for example, a grievance hearing and finding. Documentation should respect workers' rights to privacy and data protection.
The mechanism is sensitive to the needs of all workers, including vulnerable groups	Employees that may feel particularly vulnerable (such as women, ethnic or religious minorities, migrant workers, younger workers, employees with disabilities) should not be deterred from lodging a grievance. Therefore, the process for lodging grievances should be confidential to allow employees to make a grievance without anyone else knowing. It is also good practice to have both a male and female staff member available to receive and process grievances, so that employees can choose with whom they want to speak. Where there are language barriers, it may be necessary to provide written materials in different languages and to engage interpreters. Interpreters should be perceived by both sides as impartial.
Role of worker representatives	Collective grievances and disputes should be handled using the same approach as individual complaints and grievances; where there are existing arrangements for collective grievances or dispute resolution, any new procedures should build on this agreed framework. If a worker organization (normally a trade union) files the grievance or represents the worker filing the grievance, that organization should have the right to be notified and be present at all steps of the procedure. Where the procedure is agreed with trade unions, it may be possible to commit to measures to avoid industrial action until the procedure is completed.
Access to judicial remedy	The employee should understand that they have a right to revert to judicial or administrative channels (employment tribunal, labour court or labour inspectorate).

Key requests on worker GRM	Description
Specific considerations regarding gender-based violence	PR2 requires that grievance mechanisms should include provisions for confidential complaints and those requiring special protection measures, such as reports of gender-based violence. Workers who lodge grievances related to discrimination or gender-based violence should be protected from victimization or other negative consequences. Given the sensitive nature of sexual harassment cases, it is good practice to offer more than one point of contact for filing a grievance, including at least one female contact, in case an employee does not feel comfortable approaching a particular individual (for example, because they are the harasser or have personal links to the harasser). There should also be channels available for workers to lodge grievances anonymously.

Figure 3-13: GRM for employee procedure

Project's workers shall be informed on alternative GRMs in case their issues cannot be settled in an amicable manner by their respective employers and/or in case they do not feel safe in reporting grievances to their employers (such as unsafe working conditions). Also, if he considers in a dangerous unsafe situation with disastrous implications for health or imminent for life when there is no time to notify company managers (overheating of containers with risk of explosion, gas leaks, broken/non-insulated electrical cables, etc.) must be informed that they can call 112 directly without being subsequently penalized by the Company. For gender-based violence and sexual harassment complaints, employees will be informed about available dedicated institutional hotlines.

The main monitoring entity for workers will be the **Construction Supervision Engineer**. In his responsibility will be to monitor how many employees are on site, if they are working in safe conditions, if they are paid by Contractor and are not discriminated for any reasons.

3.7.5. Disclosure and Awareness

Information on the GRM will be:

- Included in project leaflets (**Annex D**) and posted on MIDR / NRA websites;
- Presented during community meetings and toolbox talks for workers;
- Displayed on notice boards at project sites and LPA offices.

Visual materials will show key contact points and the 7- / 30-day response timelines.

3.7.6. Project Grievance Flow

The Project Grievance Flow (see also Annex E) illustrates the full process and responsible entities.

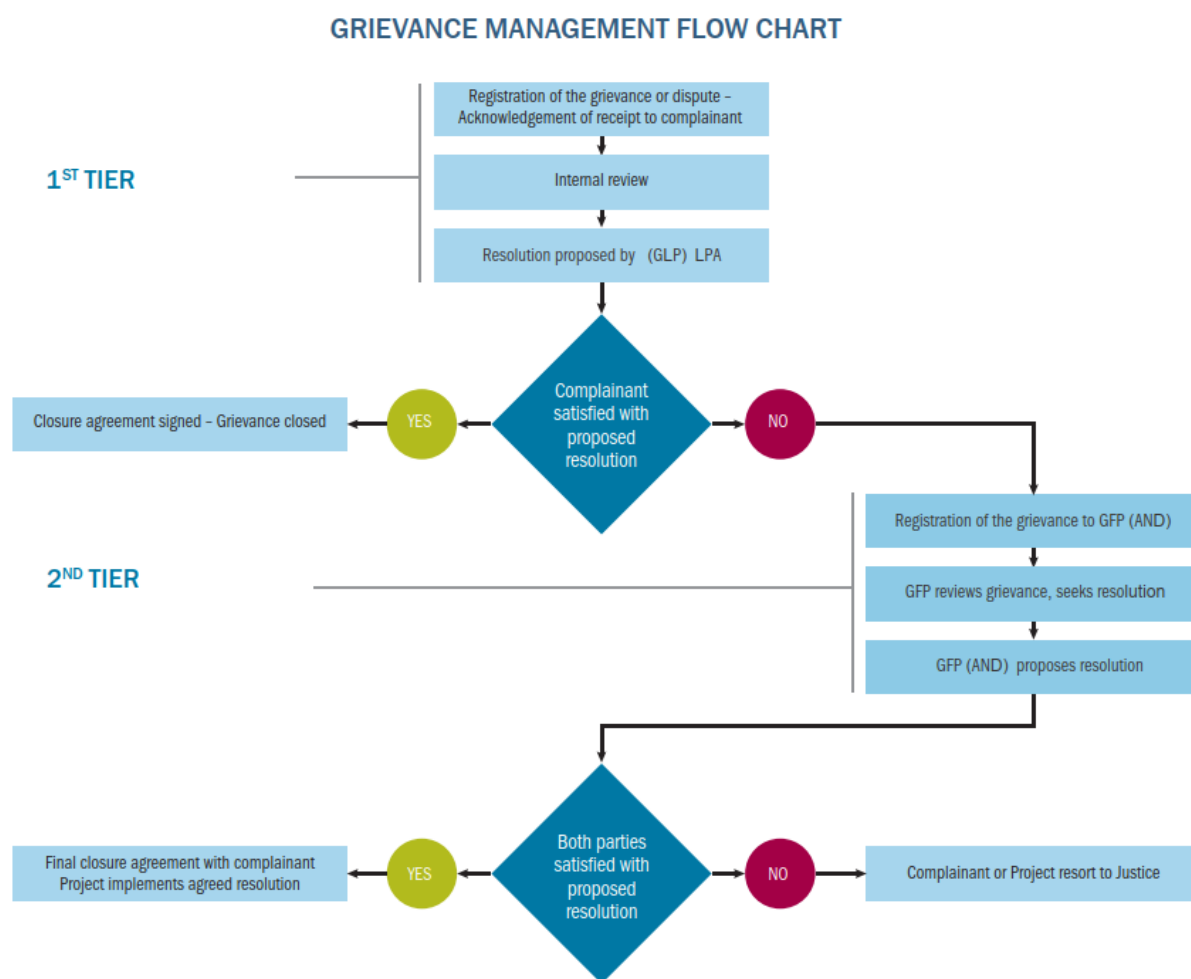


Figure 3-14: Project Grievance Flow

NRA will maintain a consolidated grievance database capturing:

- Number and type of complaints;
- Time to resolution;
- Proportion resolved within time limits;
- Recurring issues requiring systemic correction.

Quarterly summaries of grievance trends will be shared with EBRD and included in the Environmental and Social Performance Report (ESPR). Lessons learned from grievances will inform updates to mitigation measures and stakeholder engagement practices.

3.8. Roles and Responsibilities

Moldova's governance system combines a centralised policy framework with decentralised local administration. The institutions listed below ensure that the Project is implemented in line with national laws on infrastructure, environment, safety, and public health. The Ministry of Infrastructure and Regional Development provides overall policy direction, while the National Road Administration acts as the Project's Implementing Unit – PIU (through

Department of Sustainable Development and Environment and dedicated Community Liaison Officers) in coordination with environmental and social oversight bodies.

3.8.1. Key Stakeholders and Institutional Responsibilities on Project Implementation

Stakeholder/Institution	Main responsibilities
Ministry of Infrastructure and Regional Development	Central specialised authority responsible for infrastructure and regional development policy. Oversees rehabilitation, modernisation, and expansion of the national road network; ensures road-fund financing mechanisms; coordinates water-supply and sanitation infrastructure; and implements regional and urban development planning. (Regulation approved by GD No. 690/2017)
National Road Administration (formerly State Road Administration) (Project Implementation Unit – PIU)	Established in 2022 under MIRD. Responsible for maintenance, repair, rehabilitation, and management of national public roads. On 13 June 2024, the Government approved its reorganisation into a joint-stock company with full state capital, to improve financial efficiency and external-funding absorption. The NRA received in concession approximately 5,993 km of roads for 35 years. The Public Property Agency acts as its founder.
National Road Transport Agency (ANTA)	Implements national transport policies and controls compliance with national and international transport legislation. As of 30 July 2025, ANTA has also been assigned responsibility for road-infrastructure safety management, including inspections, safety audits, and operation of the National Road Safety Council.
National Inspectorate for Technical Supervision	The Inspectorate carries out the following functions in the field of construction and urban planning: monitoring the implementation of territorial planning and urban development documentation; verifying the volume and cost of construction works in cases where the projects are financed from public funds.
Local Public Authorities (LPAs)	Possess autonomous authority for local development and service delivery. Each rayon (district) elects a district council to coordinate local councils. Mayors and council members are elected for four-year terms through direct, secret, and universal suffrage. LPAs oversee local permitting, land use, and community infrastructure.
Environment Agency (AM)	Implements environmental policy, issues permits, and monitors environmental components (air, water, soil, biodiversity). Publishes the National Environmental Report.
Agency for Geology and Mineral Resources (AGRM)	Oversees implementation of state policy in geological research, soil and groundwater protection, and mineral-resource management.
Environmental Protection Inspectorate (IPM)	Ensures state control over environmentally impactful activities and resource use; monitors water and forest protection, and enforces compliance with permits and environmental regulations.
Moldsilva Agency	Administers the state forest fund and game management. Ensures sustainable forestry and biodiversity conservation, forest protection, and wildlife management.
National Agency for Public Health	Monitors the quality of drinking water and wastewater effluents; ensures compliance with sanitary and health standards. Oversees health-risk prevention linked to water and air pollution.
State Labour Inspectorate	Monitors and enforces compliance with labour laws and employee rights. It ensures fair working conditions, proper pay, observance of work and rest time, and workplace safety. Its mission is to protect workers and promote occupational safety and health by verifying that employers follow all labour legislation.
General Inspectorate for Emergency Situations	Operates under the Ministry of Internal Affairs. Responsible for civil protection, disaster-response management, and coordination of emergency actions related to natural or technological hazards.
Designer	Designer responsible for monitoring the application of the provisions of the design documentation during the execution of construction works and for participating in the preparation of the Construction Technical Book and in the acceptance of the completed works.
Contractor	Responsible for the proper execution of works in accordance with predefined measures and in compliance with national standards and the requirements of the financing institution. For this purpose, the Contractor shall appoint an Environmental Officer (e.g. environmental engineer or environmental specialist or equivalent) and a Social Consultant with adequate experience, who will be responsible for implementing all environmental and social requirements of the ESMP.
Construction Supervising Engineer	Ensure that the Contractor properly implements the environmental requirements specified in the contract documentation and in the approved ESMP at the start of construction works.

Table 3-20: Overview of the responsibilities

Successful implementation of the Stakeholder Engagement Plan (SEP) depends on clear allocation of responsibilities between the institutions involved in the M3 Road Tranche 2 Project. The framework below defines who manages disclosure, consultation, grievance handling, and reporting at each level.

3.8.2. Institutional Framework on SEP implementation

Entity / Institution	Key Responsibilities for Stakeholder Engagement
Ministry of Infrastructure and Regional Development (MIDR)	<ul style="list-style-type: none"> • Overall supervision of Project implementation and stakeholder engagement. • Oversight of the National Road Administration (NRA) and coordination with EBRD. • Approval of SEP updates and disclosure reports. • Review of unresolved grievances (Level 3).
National Road Administration (AND) (Project Implementation Unit – PIU)	<ul style="list-style-type: none"> • Day-to-day coordination of engagement and disclosure activities. • Maintenance of the Grievance Register and reporting to EBRD. • Organisation of public consultations and monitoring meetings. • Ensuring contractors comply with SEP and GRM requirements. • Preparation of quarterly engagement and grievance reports.
Contractors / Sub-contractors	<ul style="list-style-type: none"> • Conduct site-level information and communication with affected communities. • Maintain worker grievance system in line with PR2. • Report monthly to AND on community interactions and issues.
Local Public Authorities (LPAs)	<ul style="list-style-type: none"> • Facilitate community outreach and venue logistics. • Disseminate project information through notice boards and local media. • Support vulnerable or disadvantaged persons in participating in consultations. • Channel grievances to NRA to be registered in Grievance Log.
Consultant (MC Mobility / MM Engineering/Haskoning)	<ul style="list-style-type: none"> • Support NRA in SEP implementation, public disclosure, and stakeholder monitoring in ESIA stage. • Provide training to contractors and LPA representatives on engagement and GRM procedures. • Document meetings and prepare summary reports.
EBRD	<ul style="list-style-type: none"> • Review and monitor SEP implementation and public disclosure process. • Provide guidance on alignment with PR10 and review grievance statistics in ESPR.

Table 3-21: Overview of the key responsibilities of the different stakeholders on SEP implementation

3.8.3. Coordination and Reporting

- NRA will act as the central coordination point for all stakeholder engagement activities.
- Quarterly reports will summarize consultations, grievances, and corrective actions, and will be shared with MIDR and EBRD.
- A SEP implementation review meeting will be held annually to evaluate performance, update the stakeholder list, and plan future activities.
- Roles and responsibilities will be revisited periodically to reflect project progress or institutional changes.

3.9. Monitoring and Reporting

Monitoring and reporting are integral to evaluating the effectiveness of stakeholder engagement and ensuring continuous improvement.

The Project will apply clear Key Performance Indicators (KPIs) to track consultation coverage, grievance management, and inclusion of vulnerable groups.

Results will be reported quarterly during construction and annually during operation to the EBRD and disclosed publicly through summary updates on the NRA and MIDR websites.

3.9.1. Monitoring Objectives

- Verify that engagement activities are conducted as planned and in accordance with PR10;
- Measure participation and responsiveness (number of consultations, grievances resolved, etc.);
- Ensure feedback from stakeholders is documented and acted upon;
- Identify trends and recurring issues to inform adaptive management.

3.9.2. Key Performance Indicators

These KPIs ensure that the SEP for the M3 Project (Category A) meets PR10 objectives:

- systematic engagement,
- inclusive and meaningful consultation,
- timely disclosure,
- responsive grievance management,
- monitoring and continuous improvement.

They are designed to be measurable, verifiable, and aligned with the requirements described in PR10, including disclosure, meaningful consultation, grievance mechanisms, and engagement with vulnerable groups.

KPI	Definition	Target/Measure
1. KPIs for Information Disclosure		
Timeliness of disclosure	% of project documents disclosed according to PR10 timelines (e.g., ESIA package disclosed 120 days before approval for Category A).	100% of required documents disclosed on time.
Accessibility of information	Availability of project information through multiple channels (online, mayoralities, noticeboards).	All communities in the Aol have at least 2 disclosure channels.
Clarity and comprehensibility	Use of non-technical language and translations. PR10 stresses local-language disclosure	All materials translated into Romanian & Russian; NTS available.
Updates on project changes	Number of disclosed updates when risks/impacts change	All major changes disclosed within 10 days.
2. KPIs for Stakeholder Identification & Inclusiveness		
Completeness of stakeholder register	Stakeholders updated throughout the project cycle.	Register updated quarterly.
Coverage of vulnerable groups	Extent to which vulnerable groups identified and engaged separately (PR10).	100% of vulnerable categories identified and engaged.
Use of culturally appropriate methods	Engagement using methods adapted to vulnerable groups' needs	At least 2 tailored engagement methods used per vulnerable group.
3. KPIs for Meaningful Consultation		
Consultation coverage	% of communities in Aol where consultations took place (formal + informal).	100% of Aol communities consulted.
Participation rate	Number of participants vs. expected population.	Minimum 10% of households per settlement or 30 residents (whichever is higher).
Gender-balanced participation	PR10 requires gender inclusiveness	Minimum 40% participation by women.
Evidence of two-way dialogue	Record of questions, concerns, and how feedback shaped decision-making.	All consultations have documented Q&A and follow-up.
Satisfaction with consultation quality	Participants rate clarity, openness, and fairness.	≥80% satisfaction score on post-meeting survey.
4. KPIs for Grievance Mechanism Effectiveness		
Awareness of grievance mechanism (GM)	% of residents aware of the GM (based on surveys).	≥75% community awareness.
Accessibility of GM	Availability of multiple GM channels (written, hotline, online, mayoralty box).	Minimum 4 channels functioning.
Response time	Time from grievance receipt to initial acknowledgment (PR10 requires timely communication).	≤5 working days.
Resolution time	Time to fully resolve grievances.	≤30 calendar days for standard cases.
Anonymous grievance uptake	Functionality of confidential/anonymous channels (PR10).	Anonymous grievances accepted and documented; 100% confidentiality ensured.
Appeal rate	% of grievances re-opened or escalated.	<10% (indicating appropriate resolutions).
Thematic analysis of grievances	Tracking recurring issues to adjust mitigation.	Quarterly trend reporting.
5. KPIs for Engagement During Project Implementation		
Regularity of engagement	Frequency of engagement activities during construction/operation.	Monthly during peak works; quarterly during operation.

KPI	Definition	Target/Measure
Monitoring of impacts communicated to stakeholders	% of monitoring results publicly shared (noise, vibration, traffic safety updates).	100% disclosure of monitoring summaries.
Construction updates	Advance notice of disruptive activities.	Notices issued ≥ 10 days before works.
Community liaison officer (CLO) presence	Level of accessibility of the project's engagement personnel (PR10).	CLO present in each affected district at least weekly.
6. KPIs for Internal Organisational Capacity		
Staffing adequacy	Whether dedicated CLOs, E&S team, and GM staff are in place.	All roles filled; replacements within 30 days.
Training coverage	% of staff trained on PR10 requirements, GM handling, confidentiality, avoiding retaliation	100% of field staff and CLOs annually trained.
Contractor SEP compliance	Contractors conduct required engagement and GM reporting.	Monthly compliance reporting; zero major non-compliances.
7. KPIs for Monitoring, Reporting & Adaptive Management		
SEP updates	Frequency of updates to reflect new risks or project phases.	Annual SEP update + updates when risks change.
Stakeholder Engagement Register completeness	Records of all engagements maintained	100% events logged.
Public reporting	Frequency of external reports to stakeholders.	Semi-annual Community Update Reports.
Corrective actions implemented	% of corrective actions closed within defined timeframe.	$\geq 90\%$ on time.

Table 3-22: Overview of KPIs

3.9.3. Reporting and Review

- Quarterly internal reports will compile stakeholder feedback, grievances, and corrective actions, forming part of the Project's Environmental and Social Monitoring Reports.
- Annual summaries will be published on official websites and included in the Environmental and Social Performance Report (ESPR) submitted to EBRD.
- SEP implementation effectiveness will be reviewed annually and adjusted as needed, ensuring relevance and consistency with Project progress.

Monitoring records and grievance statistics are maintained in the NRA Stakeholder Engagement and Grievance Database (see Annex E).

3.10. Annexes and References

The following annexes provide supporting documentation and detailed evidence referenced throughout this Stakeholder Engagement Plan (SEP).

Annex	Title / Content	Purpose
Annex A	Baseline socio-economic/ Land use and resettlement surveys	An accurate understanding of the demographic, social, economic, and land-related conditions in the Project Area of Influence, Reference point for assessing project impacts, determining eligibility for compensation and assistance, planning fair resettlement and livelihood restoration measures, and monitoring changes over time throughout the project cycle.
Annex B	Stakeholder Register and Contact List	Provides detailed stakeholder names, affiliations, and contact data. Visual representation of the Project's Area of Influence and identified communities.
Annex C	Stakeholder Scoping Engagement Record,	Provides key issues identified from stakeholder consultation, conclusions, attendance lists, minutes, and media reports.
Annex D	Disclosure Materials (Leaflets, Notices – RO & RU versions)	Evidence of public information materials used for disclosure.
Annex E	Grievance Redress Mechanism Tools (Forms, Flowchart, Stakeholder Log Template)	Practical tools for recording and resolving grievances.

Annex F	Stakeholder Engagement Program	Detailed Stakeholder Engagement during life cycle
Annex G	Public Consultations, Focus Group Discussions and Baseline Survey Resume	Provides baseline data collection resume from communities located in the AoI, identify concerns raised, attendance lists, minutes, and media reports.

Table 3-23: Overview of annexes**References**

- EBRD Environmental and Social Policy (2019), Performance Requirement 10 – *Information Disclosure and Stakeholder Engagement*.
- Terms of Reference for ESIA and Road Safety Audit – *M3 Road Rehabilitation Project, Tranche 2 (PR 015144)*.
- Laws and Government Decisions of the Republic of Moldova cited in Section 2.
- EBRD Guidance Note on Stakeholder Engagement (2012).
- EBRD Guidance Note on Information Disclosure and Stakeholder Engagement (2023)
- Guidance on specific requirements given in PR2 guidance note (2023)
- Employee grievance mechanism: guidance note (2017)
- Guidance on specific requirements given in PR4 guidance note (2023)
- Addressing Gender-Based Violence and Harassment (GBVH)

Annex

ANNEX A – Baseline socio-economic/ Land use and resettlement surveys**ANNEX B – Stakeholder Register and Contact List****ANNEX C – Stakeholder Scoping Engagement Record****ANNEX D – Disclosure Materials (Leaflets, Notices – RO & RU versions)****ANNEX E – Grievance Redress Mechanism Tools (Forms, Flowchart, Stakeholder Log Template)****ANNEX F – Stakeholder Engagement Program during Project Lifecycle****ANNEX G – Stakeholder Engagement during ESIA (Public Consultations, Focus Group Discussions and Baseline Survey Resume)**