

**REPUBLIC OF MOLDOVA**

**MINISTRY OF ENERGY**



**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
(P510426)**

**STAKEHOLDER ENGAGEMENT PLAN  
(SEP)**

**January 2026**

**TABLE OF CONTENTS**

ABBREVIATIONS AND ACRONYMS.....	4
GLOSSARY OF KEY TERMS .....	5
1 INTRODUCTION.....	6
1.1. Background and Project’s Description.....	6
1.2. Anticipated Project Impacts .....	10
2. PURPOSE AND OBJECTIVE OF THE STAKEHOLDER ENGAGEMENT PLAN .....	13
2.1. Stakeholder engagement principles.....	13
2.2. Scope and Structure of the SEP.....	14
3. REGULATORY CONTEXT.....	15
3.1. Relevant Moldovan Legislation .....	15
3.2. World Bank Requirements .....	18
4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES .....	23
5. STAKEHOLDER IDENTIFICATION AND ANALYSIS .....	26
5.1. Stakeholders’ identification through Project’s Components .....	26
5.2. Summary of Project Stakeholder Needs .....	33
6. STAKEHOLDER ENGAGEMENT PROGRAM.....	34
6.1. Engagement Methods to be Used.....	34
6.2. Proposed Strategy for Information Disclosure.....	36
6.3. Timeline for Provision of Comments and Feedback.....	40
6.4. Future Phases of Project.....	40
6.5. Proposed Stakeholders Engagement Activities .....	41
6.6. Proposed strategy for inclusion and communication with vulnerable groups.....	48
STAKEHOLDER ENGAGEMENT ACTIVITIES .....	49
7.1. Implementation Arrangements .....	49
7.2. Roles and Responsibilities in SEP Implementation .....	49
7.3. Estimated Budget.....	51
8. GRIEVANCE REDRESS MECHANISM.....	52
8.1. Definition of GRM.....	52
8.2. GRM scope and use .....	52
8.3. Procedures - Grievance Resolution Framework.....	52
8.4. Roles and Responsibilities for GRM.....	58
8.5. Grievance Mechanism for Project’s Workers.....	60
9. MONITORING AND REPORTING OF THE SEP .....	61
9.1. Progress Reports .....	61

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

10. REFERENCES .....	61
11. ANNEXES.....	62
Annex 1: Grievance/inquiry record.....	62
Annex 3: Public Consultation Report.....	63

**TABLES**

Table 1 Project's components and subcomponents .....	9
Table 2. Gap Analysis between the National Legislation and World Bank requirements .....	21
Table 3. Summary of the meetings and previous engagement activities during Project preparation.....	25
Table 4. Directly or Indirectly Project-Affected Parties and Their Level of Interest and influence .....	27
Table 5. Other Interested Parties and their Interest/Influence .....	30
Table 6. Analysis of disadvantaged and vulnerable groups and their level of interest and influence of the Project. 33	
Table 7. Summary of Project Stakeholder Needs.....	33
Table 8. Information Disclosure Strategy .....	37
Table 9. Overview of planned communication and engagement activities of project affected parties .....	41
Table 10. Overview of planned communication and engagement activities for other interested parties .....	46
Table 11. Strategy for inclusion and communication with vulnerable groups .....	48
Table 12. Roles and Responsibilities in SEP Implementation .....	49

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

**ABBREVIATIONS AND ACRONYMS**

CNED	National Center for Sustainable Energy
C-ESMP	Contractor’s Environmental and Social Management Plan
CPF	Country Partnership Framework
C-LMP	Contractor’s Labour Management Plan
EE	Energy efficiency
EERF	Energy Efficiency Revolving Fund
EHSG	Environmental, Health, and Safety Guidelines
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
EU	European Union
GD	Governmental Decision
GoM	Government of Moldova
GBV	Gender Based Violence
GHG	Greenhouse gases /Net greenhouse gas
GRM	Grievance Redress Mechanism
IHS	Individual Heating Substation
LBD	Left bank of the Dniester river
LPAs	Local Public Authorities
MoE	Ministry of Energy
MEPIU	Moldova Energy Projects Implementation Unit
MJ	Mega Joules
NECP	National Energy and Climate Plan 2025-2030
NGO	Non-governmental organization
OIPs	Other Interested Parties
PAPs	Project Affected Parties / Persons
PBCs	Performance-Based Conditions
PDO	Project Development Objective
PPA	Public Property Agency
RE	Renewable Energy
RES	Renewable Energy Sources
SEP	Stakeholder Engagement Plan
WB	World Bank

## GLOSSARY OF KEY TERMS

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

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

**Disadvantaged and Vulnerable Stakeholders** - Individuals or groups who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/ group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and may require specific measures and/or assistance to participate. Such measures take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

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

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

**Environmental and Social Assessment** - An assessment comprising various social and environmental studies which aim to identify project risks and impacts and design appropriate mitigation measures to manage these and to enhance positive impacts and outcomes.

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

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

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

**Stakeholders** - Project-affected and other interested parties. These are individuals or groups who are affected or likely to be affected by the project, and those who may have an interest in the project and/or the ability to influence its outcome, either positively or negatively. This may include beneficiary business enterprises, partner organizations, workers and their organizations, local communities, national and local authorities, neighboring projects, and nongovernmental organizations.

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

## **1 INTRODUCTION**

The purpose of this Stakeholder Engagement Plan (SEP) is to provide a basis for a constructive relationship between the Project Implementation entities and the stakeholders during the implementation of the “Moldova Energy Efficiency Revolving Mechanism” (MEERM). The SEP has been prepared according to the Environmental and Social Standards (specifically - *ESS10: Stakeholder Engagement and Information Disclosure*) of the World Bank Environmental & Social Framework (ESF) and will cover the whole life of the Project, including design, project implementation and operation.

SEP identifies the **main project-affected and interested stakeholders** of the Project and describes their interests and engagement needs in relation to the project, as well as how they will be engaged. The SEP identifies the context under which relevant national law and the World Bank requirements for stakeholder engagement and information disclosure are to be applied, and it also proposes actionable engagement measures to be undertaken during project implementation.

The SEP also describes a project-level **Grievance Redress Mechanism (GRM)** designed to facilitate receipt and response to feedback and concerns associated with the project. The SEP may be periodically updated during project implementation to ensure that information is consistent, that methods of engagement remain appropriate and effective, and that any major changes to project activities and schedule are reflected.

### **1.1. Background and Project’s Description**

#### **1.1.1. Background**

Energy efficiency is a critical Government of the Republic of Moldova’s priority to address energy security cost-effectively, while contributing to combat climate change and address energy poverty. The Energy Strategy of Moldova until 2030 (approved by GD nr. 102/2013) sets the reduction of energy intensity by 10 percent and the reduction of energy consumption of buildings by 20 percent, as two of its key targets. Moldova has a high energy intensity compared to the EU average.

Moldova’s persistent energy dependence and recent regional shocks have spotlighted the urgent need for diversification, efficiency, and security within its energy sector. Historically reliant on Russian gas and electricity imports—especially from the MGRES//Cuciurgan Power Plant on the left bank of the Dniester river (LBD)—the country faced gas supply interruptions over the past three years, prompting rapid diversification toward European suppliers and a shift in the energy landscape. At the same time, renewable energy (RE) sources have expanded dramatically, reaching over 784 MW of installed capacity by mid-2025 and accounting for 16–17 percent of electricity consumed in 2024, with a target of 30 percent by 2030. However, RE integration remains constrained by limited storage capacity and grid balancing challenges, and Moldova continues to grapple with high tariff pressures on households and businesses, leading the government to provide significant subsidies and on-bill compensation.

## **Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan**

**The building sector** stands out as a major energy consumer, responsible for around 60 percent of the country's total energy use—public buildings alone account for nearly 20 percent of this, consuming about 200 kWh/m<sup>2</sup> on average, well above EU benchmarks. Energy inefficiency in buildings places heavy demands on the national system and household budgets, with losses reaching up to 48 percent in some cases. Addressing this, the government has prioritized energy efficiency (EE) improvements in public buildings, identifying the need for substantial investment—EUR 4 billion according to the draft Energy Strategy to 2050. Such EE programs not only cut energy costs and emissions but also stimulate local job creation, boost the construction and engineering sectors, and foster private sector and SME participation, as evidenced by parallel World Bank projects in other countries.

The **integrated national energy and climate plan (NECP) for the period 2025-2030** (approved by GD nr. 86/2025) establishes an ambitious trajectory for the gradual reduction of energy consumption, aiming to achieve new annual savings of at least 0.8% of the average value of final energy consumption recorded between January 1, 2019 and January 1, 2022. According to the analyses, to achieve this target, annual capital renovation (with energy savings of at least 60%) of approximately 1,400,000 m<sup>2</sup> of buildings is necessary, which represents 1.35% of the total area of the real estate stock.

Renovating existing buildings is essential for achieving these goals, as it will not only save energy and money but also enhance the comfort, safety, and health of the users. According to a 2019 report by the European Building Performance Institute, deep energy renovations offer special benefits for all types of buildings. This is particularly true **for public and private workplaces**: according to studies, around 36% of the European Union workforce spends 8 hours or more per day in offices. Comfortable, healthy and well-designed workplaces, which can be achieved through renovation, improve working conditions and reduce staff turnover. Worker performance can increase by up to 12% after a renovation. (*source: Buildings Performance Institute of Europe (REC-BPIE (2020)): Building Renovation: A kick-starter for the EU Recovery.*)

According to the government's recently approved Long-Term Building Renovation Strategy (2025-2050) (GD nr. 595/2025) the energy efficiency measures can save about 360 ktoe per year (deep renovation) in residential buildings and about **150 ktoe in nonresidential buildings** (office buildings, educational institutions, hospitals, hotels, restaurants, sports buildings, buildings for wholesale and retail trade services, and mixed-purpose buildings).

By **establishing a sustainable energy efficiency revolving fund**, the project aims to reduce public building energy consumption and emissions, promote renewable energy integration, and strengthen energy security, while facilitating the reforms and investment necessary for Moldova's deeper integration with EU markets.

The present project defines the continuation of the World Bank (WB) and the Government of the Republic of Moldova's efforts/ commitment to address energy security cost-effectively, while contributing to combat climate change and address energy poverty. The project builds upon the results of "Sustainable Transition Through Energy Efficiency Project in Moldova (STEEM)" supported by donor partners under the Moldova Energy Efficiency Program in Public Buildings, which addresses the Country Partnership Framework (CPF) call for an urgent nationwide focus on efficient energy use.

## **Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan**

The proposed project closely aligns with Moldova’s Country Partnership Framework (CPF) for FY23–FY27, the National Energy Strategy to 2030, the National Energy and Climate Plan, and the country’s Nationally Determined Contribution (NDC) under the Paris Agreement, as well as the World Bank Country Climate and Development Report (CCDR). Formally, the proposed project supports Moldova’s GHG reduction commitments as set out in the Low Emission Development Strategy of the Republic of Moldova until 2030 and its implementation Action Plan (GD nr.1470/2016).

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

The **Project Development Objective (PDO)** is to improve energy efficiency in public buildings and introduce a sustainable financing mechanism for Energy Efficiency.

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

- (a) Projected lifetime energy savings from EE investments in public buildings (GWh);
- (b) Reduced emissions for heating in public buildings (Mtoe)
- (c) Operationalization of a revolving mechanism (Yes/No)

### ***1.1.3. Project Components***

**The proposed project would support the establishment and operationalization of an Energy Efficiency Revolving Fund (EERF) to finance energy efficiency in public buildings**, with CNED acting as the Implementing Agency. The project will establish a revolving mechanism that enables public buildings to benefit from energy-efficient renovations in a financially sustainable way. The savings generated from these energy efficiency upgrades will be reused to scale up the program and expand its coverage to target other buildings.

Through a time-bound nomination approach, eligible buildings would be selected for Energy Efficiency retrofitting and the EERF – implemented by CNED - would provide a full-service pathway to support this. Pipeline development could start with an outreach and screening exercise by CNED, supported by the proposed project, to confirm eligibility and aggregate demand. CNED have a database of buildings for which it could undertake walk-through energy audits to confirm eligibility and estimate investment costs and potential energy savings. The process by which the selection of buildings will be set out in the Project Operations Manual, and could look to bundle multiple facilities per round to improve efficiency and reduce costs.

A detailed energy audit would then be procured by CNED. This, to define the baseline, identify measures (e.g., lighting, HVAC, envelope upgrades), estimate savings, and develop detailed designs. These would then inform the procurement of the physical retrofitting works, and associated renewable energy capacity if needed. CNED would also, through the project, be able to support associated safeguards measures such as stakeholder consultations through the EERF.

The proposed repayment mechanism would be anchored in deemed energy cost savings through “budget capture”. This, whereby the Ministry of Finance would reduce energy budget transfers by the deemed savings – which would be quantified, and a payment schedule set out in the Energy Service Agreement.

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

The Ministry would then remit that amount directly to the EERF dedicated account, improving enforceability and minimizing payment risk. As repayments flow in, they replenish the EERF, enabling it to finance subsequent projects, progressively scale the program, and over time could potentially transition to risk-sharing instruments that mobilize private capital. In parallel, the EERF would carry out Measurement and Verification (M&V) of energy saving to validate assumptions, identify operational issues and guide corrective actions, and build capacity for sound M&V to enable performance-based contracts and ESCOs in the future.

**Major project components include:**

*Table 1 Project's components and subcomponents*

<p><b>Component 1: Energy Efficiency Investments (US\$48 million – TBC)</b></p>	<p>This component will finance the retrofit of public buildings, owned by Central Public Authorities, which will include: (i) standard energy efficient retrofit measures, such as thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system and changing the individual heat point, and replacement of lighting, using well proven technologies and equipment for energy efficiency improvements in end-use application, and (ii) if technically feasible and economically viable, advanced energy technologies for space heating, such as heat pumps or solar thermal collectors, and rooftop solar PV to cover own electricity demand. This component will also include the EE retrofitting of selected shelters for female survivors of GBV currently being supported by the World Bank WEGs project (P168790). Specific measures for each subproject will be determined based on professional energy audits and designs. This component will also finance necessary energy audits, designs, associated studies and M&amp;V to inform the works and help quantify energy savings.</p>
<p><b>Component 2: Technical assistance and project management (US\$4 million - TBC).</b></p>	<p>This component would consist of two subcomponents:          (a) Subcomponent 2a. Project implementation support (US\$3 million IBRD): This subcomponent would cover subproject development costs such as marketing and outreach, screening of subproject candidates, and review of energy audits and technical designs; day-to-day project management such as preparation and management of procurements, contract management, and supervision of renovation works; implementing financing requirements in compliance with the Bank's fiduciary policies and guidelines; ensuring satisfactory implementation of the Bank's Environmental and Social Framework (ESF); Project monitoring and evaluation (M&amp;E); equipment needed for day-to-day project implementation; incremental operational costs; support for early subprojects such as advice and review of energy audits and technical designs; expert advice on implementation of M&amp;V and ESAs; training of building administrations on disaster and climate-related risks- with a focus on local hazards, emergency preparedness, and resilience.          (b) Subcomponent 2b. Technical Assistance (US\$1 million MGROW grant): This subcomponent would further support development of the Energy Audit Information System, approved by GD nr. 144/2025 (<i>SI Audit Energetic</i>) and the Energy Management Information System (<i>SI Managementul Energetic</i>), Technical Assistance to move towards the <i>Super-ESCO model</i>, project</p>

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

	communications and dissemination of results, and capacity building and knowledge sharing for CNED staff, service providers such as energy auditors and designers, construction firms, ESCOs, building administrators, and any other relevant project stakeholders.
--	--

## 1.2. Anticipated Project Impacts

Under **Component 1** the project will finance the retrofit of public buildings, owned by Central Public Authorities, which will include: (i) standard energy efficient retrofit measures, such as thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system and changing the individual heat point, and replacement of lighting, using well proven technologies and equipment for energy efficiency improvements in end-use application, and (ii) if technically feasible and economically viable, advanced energy technologies for space heating, such as heat pumps or solar thermal collectors, and rooftop solar PV to cover own electricity demand. Specific measures for each subproject will be determined based on professional energy audits and designs. Technology risk may occur advanced technology applications on design, installation and O&M at moderate level. Capacity building measures will be important to reduce those risks. Limited additional funding (up to 10 percent of total investment costs per subproject) may be provided to finance 'ancillary measures' to ensure reasonably full renovation or longevity of the investment (e.g., replacement of old gutters and down spouts to ensure that building envelopes don't get damaged by water) and a minimum level of improvement of sanitary facilities (i.e. washing rooms).

All buildings are owned or managed by central public authorities (CPA) from the Republic of Moldova and their territorial subdivisions.

The geographical coverage of the project interventions includes only urban areas (towns): city of Chisinau, and might as well include other towns.

**Beneficiary criteria that was used at the screening stage / after completing of energy audit**, include: (i) full ownership by a central governmental institution and primary used for public services (administration, or health or education, social, etc.) and the Public agency has full control over energy costs and payment for energy; (ii) preliminary confirmed structural soundness of the buildings (in terms of structural durability and safety of the construction); stability of the building, no seismic and construction damages; (iii) secured prospective use of the facility, and absence of plans for closure or downsizing or privatization; and (iv) the building has been constructed between 1950 and 2005, as it is expected that relatively new buildings have lower demand for retrofit, (v) detached, single use buildings to achieve significant energy savings and enable cost reduction benefits, and (vi) no significant capital repairs or mayor renovation over the last five years, to avoid renewed EE intervention for buildings with already better energy performance.

Based on preliminary project assessment the types of institutions that will be covered by the specific sub-project activities include the buildings in the public domain of the state, heated and/or cooled, in which the specialized central public administration authorities carry out their activities, among these can be found:

- Administrative Buildings;
- Emergency situations inspectorate (IGSU);
- Cultural Centers;

## Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan

- Health institutions;
- Educational Institutions;
- GBV Shelters;
- Temporary placement center for Children.

## Environmental and Social Standards (ESSs)

Out of 10 Environmental and Social Standards (ESSs), **seven found to be relevant to the project**. These are:

- **ESS 1**- Assessment and Management of Environmental and Social Risks and Impacts;
- **ESS 2** - Labor and Working Conditions;
- **ESS 3** - Resource Efficiency and Pollution Prevention and Management;
- **ESS 4** - Community Health and Safety;
- **ESS 8** - Cultural Heritage;
- **ESS 9** -Financial Intermediaries;
- **ESS 10**- Stakeholder Engagement and Information Disclosure.

Environmental risks for the project are assessed as *Moderate*. The social risks of the project are assessed as *Low to Moderate*. Overall, the project is likely to generate some environmental impacts related to the energy efficiency (EE) investments, but also to bring positive impacts in terms of energy conservation and reduction of GHG emissions and air pollution.

**The environmental impacts** are expected to be **predictable, temporary, low in magnitude, and site specific** without likelihood of impacts beyond the actual footprint of the project, reversible, and manageable through the implementation of cost-effective mitigation measures in line with national laws as well as the use of the World Bank Environmental & Social Standards (ESS), Environmental, Health, and Safety Guidelines (EHSG) and Good International Industrial Practices (GIIP). However, considering the project description and the planned activities primarily associated with medium scale EE civil works, **key environmental issues** will be related to (a) waste management including hazardous waste (potentially of asbestos containing material, old isolation materials, ODS leakage risks) during construction works; (b) occupational health and safety of workers; (c) community health and safety of residential population, staff, personnel, and visitors during construction works; (d) disruption of regular activities as a result of construction noise or dust pollution and for trimming of trees/ branches safely for roof related works; (e) traffic disruption in residential areas (depending upon specific location), transport and traffic safety at construction sites.

**Social risks** associated with the rehabilitation of public sector buildings are likely to be **low magnitude**, site specific, predictable, and contained within existing site boundaries. The project will work within existing public buildings, so land acquisition will not be required, and the project is not expected to cause any physical or economic displacement.

**The social risks of the project include:** i) labor and occupational health and safety risks related to small civil works from rehabilitation of public buildings; ii) temporary relocation of staff and users of target buildings, as well as temporary disruption, suspension or relocation of services; iii) community health and safety risks from small works, including dust, noise, vibrations, exposure to hazardous materials, traffic safety and pedestrian circulation; iv) SEA/SH risks from a limited amount of labor influx, particularly in works that will be carried out in buildings that provide community services such social service providers

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

center and medical institutions as well as in existing GBV shelters. Given that some buildings may house public services, there is a risk of disproportionate impacts on vulnerable groups and individuals.

The works under Components 2 are unlikely to involve large-scale labor force. Workers will mainly comprise small crews of qualified technicians are required for installing thermal insulation, roof refitting/refurbishment, high-quality energy efficient windows, and advanced equipment, and some semi-skilled workers for smaller subprojects.

## **2. PURPOSE AND OBJECTIVE OF THE STAKEHOLDER ENGAGEMENT PLAN**

The effective stakeholder engagement will improve the environmental and social sustainability of the Project, enhance Project acceptance, and significantly contribute to successful Project design and implementation. Stakeholder engagement is an inclusive process conducted throughout the Project life cycle. The SEP will support the development of strong, constructive, and responsive relationships between the Project's implementation entities and Project's beneficiaries in order to ensure the successful management of a Project's environmental and social risks.

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

Consequently, the objectives of this SEP are:

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

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

### **2.1. Stakeholder engagement principles**

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

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process.

## **Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan**

Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, internally displaced persons (IDPs), returnees, persons with disabilities, youth, elderly and those living in remote or inaccessible areas.

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

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

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

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

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

During active project implementation stage, the subproject screening and ESMPs should include details on mechanisms for engagement of stakeholders at the subproject level and particularities of each stage (design, construction, operation).

### 3. REGULATORY CONTEXT

#### 3.1. Relevant Moldovan Legislation

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

##### *3.1.1. Relevant legislation for public consultation and participation in decision-making process*

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

##### *Article 32. Freedom of Opinion and Expression*

1. Every citizen shall be guaranteed the freedom of thought and opinion, as well as the freedom of expression in public by means of word, image or any other means possible.
2. The freedom of expression may not harm the honor, dignity or the rights of other people to have and express their own opinions or judgments.

##### *Article 34. Right of Access to Information*

1. The right of a person to have access to any kind of information of public interest shall not be curtailed.
2. Public authorities, according to their as-signed competence, shall be committed to ensure that citizens are correctly informed.
3. The right of access to information shall not prejudice neither the measures taken to protect the citizens or the national security.
4. The State and private public media shall be bound to provide the correct information of the public opinion.
5. The public media shall not be submitted to censorship.

- **Law on access to information of public interest nr. 148/2023**

The present law regulates:

- a) the manner of exercising and defending the right of access to information of public interest;
- b) the obligations of information providers in ensuring access to information of public interest;
- c) legal liability for violating the provisions regarding access to information of public interest;
- d) the mechanism for monitoring and controlling the implementation of the law.

- **Law on open data and the reuse of public sector information nr. 109 /2025**

This law aims to establish uniform minimum rules for the commercial and non-commercial reuse of public sector information. This law regulates the legal framework for the reuse of information held by public sector bodies and public undertakings, generated in the course of their activities, including for the purpose of developing new information products and services, as well as the practical arrangements for facilitating the reuse of: 1) existing information held by public sector bodies; 2) existing information held by public undertakings which: a) carry out one of the activities referred to in art. 9–15 of Law no. 74/2020 on procurement in the energy, water, transport and postal services sectors; b) carry out their activity as public service operators pursuant to art. 78 of the Railway Transport Code no. 19/2022; c)

## **Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan**

carry out their activity as air carriers fulfilling public service obligations pursuant to the Air Code; 3) information resulting from research activity, in accordance with the conditions provided for in art. 12.

- **Law on Environmental Impact Assessment no.86/2014, as amended in 2015, 2017, 2022 and 2023.**  
This Law sets the basis for the functioning of the mechanism of environmental impact assessment of some public and private projects or some projected economic activities with a view of prevention or reduction the negative environmental impact and protection of public health at the initial stages of project performance. EIA shall be performed in accordance with the following principles: (a) preventive actions; (b) reliability and completeness of information c) principle of transparency and accessibility; d) participatory principle; e) precautionary principle; f) polluter - pays principle. Public consultations for the projects which require a full EIA are compulsory at the initial stage of the project before preparing the EIA (at the scoping stage) and at a later stage, when the Statement on EIA is disclosed to the public prior to reviewing the final (updated) documentation by the state environmental authority.
- **Law on Freedom of Expression no.64/2010, as amended in 2012, -2013,2015 and 2021**  
This law guarantees right to freedom of expression and regulates the balance between right to freedom of expression and defense of private and family life.
- **Law on Transparency in Decision Making no.239/2008, as amended in 2010, -2014, 2016, 2023 and 2024**

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

According to the present law, Citizens have the right:

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

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

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

- **Government Decision no. 967/2016 Regarding the public consultation mechanism with civil society in the decision-making process.** This decision sets the framework for consultation of civil

## **Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan**

society, describing the step-by-step tasks, roles and responsibilities of the authorities, including deadlines, consultation methods, and transparency of the adoption of decisions. It also recommends that local public administrations update their internal procedures related to the transparency of the decision-making process.

### ***3.1.2. Relevant legislation for grievances redress***

- **Administrative Code of the Republic of Moldova no.116/2018, as amended in 2019, 2020, 2021, 2022 and 2023, 2024 .**

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

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

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

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

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

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

The general term runs from:

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

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

- **Civil Code of the Republic of Moldova no. 1107/2002 with the latest amendments from 2019, 2020, 2021, 2022, 2023, 2024, 2025**, which is based on the recognition of the equality of the participants in the relationships regulated by it, the protection of intimate, private and family life, the recognition of the inviolability of property, the freedom of contract, the protection of good faith, the

## Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan

protection of the consumer, the recognition of the inadmissibility of interference in private affairs, the need for the free realization of civil rights, to guarantee the restoration of the person's rights in which he was injured and to defend them by the competent jurisdictional bodies.

- **Labor Code of the Republic of Moldova no. 154/2003 with the latest amendments from 2019, 2020, 2021, 2023, 2024, 2025.** This code regulates all individual and collective labor relations, control of the application of regulations in the field of labor relations, labor jurisdiction, as well as other relations directly related to labor relations.
- **Law on social assistance no. 547/2003 with the latest amendments from 201, 2018, 2022, 2023 and 2024-** aims to determine the principles and objectives of social assistance, establish the right to social assistance, social assistance benefits and services, their beneficiaries, as well as the requirements for the staff of the social assistance system.
- **Law on social services no. 123/2010, with the latest amendments from 2018, 2019, 2020 , 2022, 2023** - establishes the general framework for the creation and operation of the integrated system of social services, with the determination of the tasks and responsibilities of the central and local public administration authorities, of other legal and physical persons empowered to ensure and provide social services, as well as the protection of the rights of the beneficiaries of social services. **Law on employment promotion and unemployment insurance no. 105/2018, with latest amendments from 2019, 2021, 2022, 2023, 2024 and 2025.** The purpose of this law is to prevent and reduce unemployment and its social effects, reduce the risk of unemployment, and ensure a high level of employment and adaptation of the labor force to the requirements of the labor market.
- **Law on ensuring equal opportunities between women and men no. 5 /2006 with latest amendments from 2022, 2023 and 2024.** The purpose of law is to ensure the exercise of their equal rights by women and men in the political, economic, social, cultural, other spheres of life, rights guaranteed by the Constitution of the Republic of Moldova, in order to prevent and eliminate all forms of discrimination according to the gender criteria.
- **Law on Social Inclusion of Persons with Disabilities, no. 60/2012 with latest amendments from 2023, 2024 and 2025** The law ensures the rights of persons with disabilities for their social inclusion, guaranteeing the possibility of their participation in all areas of life without discrimination, at a level identical to the other members of the society, having as a basis the respect of fundamental human rights and freedoms.

### 3.2. World Bank Requirements

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

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

## **Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan**

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances. For the purpose of the ESS 10, "stakeholder" refers to individuals or groups who:
  - a) are affected or likely to be affected by the project (project-affected parties); and
  - b) may have an interest in the project (other interested parties).

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

- a) The grievance mechanism is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Borrower will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and
  - b) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.
1. The scope, scale and type of grievance mechanism required will be proportionate to the nature and scale of the potential risks and impacts of the project.
  2. The grievance mechanism may include the following:
    - a) Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a web site;
    - b) A log where grievances are registered in writing and maintained as a database;
    - c) Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
    - d) Transparency about the grievance procedure, governing structure and decision makers; and
    - e) An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

3. The Borrower may provide mediation as an option where users are not satisfied with the proposed resolution.

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

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

Some of the objectives of this standard are:

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

**ESS 3. Resource Efficiency and Pollution Prevention and Management** recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services, and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention, and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable.

Some of the objectives of this standard are:

- (a) To promote the sustainable use of resources, including energy, water, and raw materials.
- (b) To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.
- (c) To avoid or minimize project-related emissions of short- and long-lived climate pollutants.
- (d) To avoid or minimize generation of hazardous and nonhazardous waste.
- (e) To minimize and manage the risks and impacts associated with pesticide use.

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

Some of the objectives of this standard are:

- (a) To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances.
- (b) To promote quality and safety, and considerations relating to climate change in the design and construction of infrastructure, including dams.

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

- (c) To avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials.
- (d) To have in place effective measures to address emergency events.
- (e) To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.

**ESS8: Cultural Heritage**

Requires the protection and preservation of cultural heritage from adverse impacts of project activities. This includes tangible and intangible heritage, and mandates procedures for chance finds during project implementation.

**ESS9: Financial Intermediaries**

Applies to projects involving financial intermediaries (FIs) such as banks or funds. It requires FIs to assess and manage environmental and social risks in their portfolios, develop and maintain an Environmental and Social Management System (ESMS), and report on performance.

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

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

National legislation	World Bank	The Project
<p>The national legislation does not have provisions for the development of a specific Stakeholder Engagement Plan for public consultations, however the requirement for public consultation and the procedure is clearly described in Law no. 239/2008 on transparency in decision-making and in Government Decision no.967/ 2016 on the mechanism for public consultation with civil society in the decision-making process.</p>	<p>Consultations with stakeholders and public involvement are an integral part in the development and implementation of the SEP.</p>	<p>Moldova currently does not contain express terminology and requirements for developing a Stakeholder Engagement Plan; however, it contains requirements for transparency and public consultations in the decision-making process. Although SEP requirements are not provided under the national legislation, the project has developed the present SEP and will carry out a comprehensive consultative process with project - affected persons, state authorities, other stakeholders as required through public disclosure meetings, individual consultations and public consultations.</p>

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

<p>The formal mechanism only.</p> <p>The anonymous or submitted petitions without indicating the petitioner's postal or e-mail address are not examined.</p> <p>No different approach depending on type of grievance or for different categories of persons.</p>	<p>The formal or informal grievance mechanism.</p> <p>The mechanism will also allow for anonymous complaints to be raised and addressed.</p> <p>The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive.</p>	<p>The project will establish, publicize, maintain, and operate an accessible grievance mechanism according to ESS 10.</p> <p>To receive and facilitate resolution of concerns and grievances in relation to the Project, including anonymous grievances and SEA/SH complaints.</p>
<p>The national legislation does not have special provisions to address the concerns of the vulnerable groups during the consultation process.</p>	<p>The ESS10 specifically provides for the identification and engagement with the vulnerable groups that might be affected by the project to ensure that these groups also benefit from the project activities.</p>	<p>The SEP will identify affected vulnerable persons and engagement mechanisms to ensure that their voice is heard and their concerns are addressed to the extent possible by the project.</p>
<p>The national legislation does not have provisions to establish a Project specific GM.</p>	<p>According to the ESS 10 and ESS 2 the Project specific GM should be established and be easily acceptable for all stakeholders at each stage of Project, including specific GM for project workers</p>	<p>The Project specific GM will be established for all stakeholders at each stage of the Project, including GM for all project workers<sup>3</sup>.</p>

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

#### **4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES**

*Moldova Energy Efficiency Revolving Mechanism (MEERM)* projects build on results and agreements reached through the discussions and consultations conducted by the Ministry of Energy and the World Bank.

During MEERM project design stage the following meetings were organized to discuss the aspects that could potentially affect it, as follows:

- In the beginning of November 2025, Site visits were organized for a number of potential buildings in order to define the typology of buildings relevant to the project.
- Several public institutions were also consulted to assess their interest and to support the prioritisation of a list of potential beneficiaries.

The MEERM Project design is developed based on STEEM project similar investments and the engagements related to those projects have informed project design of MEERM.

The dissemination and consultation of the Environment and Social Framework (ESF) package will be the first step in the dedicated information and engagement of the MEERM stakeholders and will build on recent and ongoing engagements from previous similar investments.

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

**Moldova Energy Projects Implementation Unit (MEPIU) implements at this stage two project with similar investments:**

- *Moldova Energy Efficiency Project (MHEP)*, aiming to improve energy efficiency in public buildings, municipal and state owned, in the Republic of Moldova;
- *Sustainable Transition Through Energy Efficiency Project in Moldova (STEEM)* project, aiming to enhance energy efficiency in existing public buildings and the district heating sector in Moldova and provide immediate and effective response to an eligible crisis or emergency.

**National Center for Sustainable Energy (CNED) implements reference projects:**

- *Finalization of Energy Efficiency Fund Projects (Public Sector)*  
Projects in the public sector have been financed through the Energy Efficiency Fund, established under Government Decision No. 401/2012. In 2019, management responsibilities were transferred to the Energy Efficiency Agency (Government Decision No. 45/2019), and in 2023, to the National Center for Sustainable Energy (Government Decision No. 1060/2023).

CNED is currently completing the final portfolio of public-sector energy efficiency projects initiated under the Fund, which include deep renovation of public buildings, improvements to heating and lighting systems, and thermal insulation measures. The experience gained provides a mature operational and technical base for implementing complex energy-efficiency investments at scale.

- *Residential Energy Efficiency Fund (REEF / FEERM)*  
The Moldova Residential Energy Efficiency Fund (FEERM) financing programme was approved by the Government of the Republic of Moldova on 10 April 2024. The programme aims to

## **Moldova Energy Efficiency Revolving Mechanism Stakeholder Engagement Plan**

accelerate the renovation of the residential sector—both apartment buildings and individual houses with extreme energy vulnerability. FEERM mobilises approximately 1.4 billion MDL for the period 2024–2027, with the budget managed by CNED. The Fund is financed from:

- resources collected under the Programme on the implementation of the energy efficiency obligation mechanism;
- grants and donations from development partners, and
- allocations from the Energy Vulnerability Reduction Fund (FRVE).

Under FEERM, CNED is implementing large-scale investment sub-programmes that include energy audits, technical design, construction works, and supervision services.

- *Additional CNED-Managed Initiatives, such as:*

- *EcoVoucher Programme for Home Appliances.* Since 2024, CNED has been responsible for the national EcoVoucher Programme, established through Government Decision nr. 533/2024 and financed by the Energy Vulnerability Reduction Fund and development partners. The programme supports vulnerable households in replacing old, inefficient appliances with high-efficiency models, contributing to immediate electricity savings and reduced energy bills. The programme is implemented through a dedicated digital platform, enabling automated beneficiary verification, voucher distribution, and monitoring of redemptions. More than 32000 vouchers were distributed, demonstrating CNED’s strong operational capacity in administering high-volume, high-impact national programmes.
- *Projects for Public Buildings Financed by SlovakAid.* CNED also implements a series of public-building (gymnasium) energy-efficiency projects financed by SlovakAid, including thermal insulation.

CNED based on knowledge and activities related to these types of investments has outlined the following **key general engagement features:**

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

The mentioned aspects above is taken into consideration at the development of the stakeholder engagement program for the MEERM Project. The table below summarizes the engagement activities carried out by CNED under the ongoing Projects, related to the energy sector development, which justify and support MEERM design, preparation and further implementation.

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

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

Timing	Participants	Scope and Areas of discussion
November 2025	CNED, WB experts and contracted consultants	<p>Site visits were organized for a number of potential buildings, in order to define the typology of buildings relevant for the project. Several public institutions were also consulted to assess their interest and to support the prioritization of a list of potential beneficiaries.</p>
Public Consultations on ESMF and SEP – December 17, 2025	Representatives of the CPAs, NGOs, interested groups and various stakeholders	<p>The public consultations shall include series of events, including the Public Consultation Event of ESMF and SEP, organized by CNED on December 17, 2025 within the Ministry of Energy premises.</p> <p>The event was organized in a hybrid format with combined physical and online participation of the participants. In total, <b>38 participants (16 in room and 22 online) attended the event.</b> The profile of participants included representatives of central public authorities and line ministries (Ministry of Energy, Ministry of Social Protection and Labour, Ministry of Economic Development and Digitalization, Ministry of Health, Ministry of Energy, Ministry of Environment, National social insurance house (CNAS) General Inspectorate of Police of the Ministry of Internal Affairs, General Inspectorate for Emergency Situations – (IGSU), Environmental Agency, Chamber of Industry and Commerce of Moldova, Trade Union Association, Moldova Energy Projects Implementation Unit (MEPIU), representatives of the Central Public building administration, energy experts.</p> <p>Participants were familiarized with the Environmental and Social Management Framework (ESMF) which outlined major potential environmental and social risks and impacts associated with the project and proposed corresponding mitigation measures.</p> <p>At the outset, the general World Bank Environment and Social Framework (ESF), along with the relevant Environmental and Social Standard (ESS) and applicable legal and regulatory frameworks pertinent to the project, were presented to the participants. It was also explicitly noted that the overall environmental and social risks of the project have been assessed as <i>Low to Moderate</i>.</p> <p>Detailed information on the anticipated risks and the mitigation strategies proposed under the project was presented and brought to the attention of the participants. Subsequently, the importance of stakeholder engagement, reflected within the Stakeholder Engagement Plan was highlighted, with particular emphasis on the project’s focus on specific project affected parties, other interested groups and vulnerable categories of stakeholders.</p> <p>The presentation concluded with an overview of the Grievance Redress Mechanism, which CNED will manage in its capacity as the project’s implementing institution.</p> <p>Participants have noticed that the criteria for buildings selection, the expected EE investments were clear and that the specific measures for each subproject will be determined based on</p>

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

		<p>professional energy audits and designs. In addition it was suggested to include in ESMF more details of climate change adaptation aspects related to envisaged project activities and integrate as well management of mercury containing waste.</p>
--	--	--

## 5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

The WB ESS 10 recognizes two broad categories of stakeholders:

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

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

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

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

#### 5.1.1. Project Affected Parties

Key project stakeholders are **institutions owning target buildings and their users**, including vulnerable groups (elderly, women, children, persons with disability, GBV shelter users) potentially affected by construction and EE retrofit measures. It is expected that the following types of building, preselected based on established criteria will benefit of project activities: (i) administrative buildings owned by central public authorities; (ii) educational institutions; (iii) health institutions; (iv) cultural centers, (v) rehabilitation and temporary placement center for children; (vi) GBV Shelters.

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

The expected beneficiaries of the Project include:

(a) *Public authorities (buildings of specialized central public administration authorities administrators and staff)*. Energy efficiency improvements are expected to result in improvement of the working conditions and in energy cost savings, that will create a solid base for further benefit from energy-efficient rehabilitations in a financially sustainable manner by ensuring the savings generated by the EE upgrades support EE measures in new buildings. Additionally, public authorities will benefit from capacity building activities supported under this project (maintenance of installed equipment, accounting of energy cost savings, etc).

(b) *Public building users (various population categories, benefiting of public services)*. EE measures shall all types of users to benefit of indoor thermal conform levels, improved lightning and indoor ventilation / air quality.

(c) *The users of Rehabilitation and temporary placement centers / GBV shelters* shall benefit of improved living conditions, regular access to hot water and improved thermal indoor comfort and better lightning and indoor air quality.

(d) *Private sector energy service suppliers (construction and design companies, energy auditors, Energy Service Companies, equipment suppliers, etc.)*. Various private sector market actors are expected to benefit from the project by building demand for their energy efficiency goods and services, and by enhancing their capacity to prepare, appraise, implement, finance and/or monitor energy efficiency projects through targeted training and technical assistance activities. Specific beneficiaries may include: energy auditors, design and construction companies, equipment suppliers, commercial banks and Energy Service Companies (ESCOs).

e) *National Regulatory and Financial Authorities (including the Ministry of Finance) in the field of energy* will benefit of project measures targeted towards the operationalization of an Energy Efficiency Revolving Fund (EERF), designed to reinvest realized energy savings into future projects with the purpose to ensure the continuous replenishment of financial resources for energy efficiency

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

Stakeholder Group/Persons:	Interest in Project or How Potentially Affected by Project:	Interest	Influence
<b>Management of the administrative/central public authorities' buildings</b>	<ul style="list-style-type: none"> <li>- Beneficiaries of the planned investments under component 1</li> <li>- Beneficiaries of reduced energy costs following the implementation of investments.</li> <li>- Can be involved in the mitigation of the environmental, social, health and safety risks and impacts, including operation of the GRM at local level.</li> <li>- Monitoring of implementation of the site-specific measures during the construction.</li> <li>- Collaboration with the contractors and consultants selected under the Project for proper risks and impacts mitigation.</li> </ul>	High	Medium
<b>Direct beneficiaries of investments under Component 1: Staff of public buildings and businesses operating within them (the buildings in the public</b>	<ul style="list-style-type: none"> <li>- Beneficiaries of improvement working and service provision condition, improvement of the comfort level based on the improved heat and hot water supply system, lighting and indoor air quality.</li> <li>- Potential affected by noise, dust vibration, exposure to hazardous materials and temporary access restriction during the works.</li> </ul>	High	Medium

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

domain of the state, heated and/or cooled, in which the specialized central public administration authorities carry out their activities	<ul style="list-style-type: none"> <li>- Potentially affected by temporary relocation of staff and users of target buildings, as well as temporary disruption, suspension or relocation of services;</li> <li>- Potentially affected by relocation of business or other restrictions.</li> <li>-</li> </ul>		
<b>Direct beneficiaries of investments under Component 1:</b> Users of public buildings (the buildings in the public domain of the state, heated and/or cooled, in which the specialized central public administration authorities carry out their activities)	<ul style="list-style-type: none"> <li>- Beneficiaries of improvement service provision and living conditions: improvement of the comfort level based on the improved heat and hot water supply system, lighting and indoor air quality and insulation.</li> <li>- Potential affected by noise, dust vibration, exposure to hazardous materials and temporary access restriction during the works.</li> <li>- Potentially affected by temporary disruption, suspension or relocation of services</li> <li>- Information flow and Contractor’s work program shall be discussed and consulted in an open, transparent manner, adjusting to special needs of users.</li> </ul>	High	High
Central public authorities (CPAs)	<ul style="list-style-type: none"> <li>- Energy cost savings for public facilities;</li> <li>- Beneficiaries of the Energy Efficiency Fund operationalization</li> <li>- Improvement of the working, service provision and living conditions for the public building staff /beneficiaries/users.</li> </ul>	High	High
Contractors, Consultants and Energy Service Companies (ESCOs).	<ul style="list-style-type: none"> <li>- Collaboration with the CNED team, contractors and consultants during the design, construction and operation stage of component 1</li> <li>- Involved in the investment implementation under Component 1</li> <li>- Collaboration with the managers of buildings, staff and public service provider</li> <li>- Collaboration in the risks and impacts identification and mitigation.</li> <li>- Provision of the services, goods and works for the successful implementation of the component1.</li> <li>- Can be involved in the continuous consultation process and GRM operation using the existing communication/feedback channels for information and interaction with their consumers (Call-center, viber, social media etc.).</li> </ul>	High	High
Contractors and Consultants	<ul style="list-style-type: none"> <li>- Involved in the investment implementation.</li> <li>- Collaboration in the risks and impacts identification and mitigation.</li> <li>- Provision of the services, goods and works for the successful implementation of the component 1.</li> </ul>	High	High
The community – residents who live near the buildings that will benefit from the investments.	<ul style="list-style-type: none"> <li>- Can potentially be affected by community health and safety risks from small works, including dust, noise, vibrations, exposure to hazardous materials, traffic safety and pedestrian circulation;</li> </ul>	Low to Medium	Low to Medium

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

<p>Government of the Republic of Moldova, specifically MoE , CNED</p>	<ul style="list-style-type: none"> <li>- Beneficiary of the planned investments</li> <li>- CNED in consultation with Ministry of Energy and Ministry of Finance prepare the required legal documents on establishment of energy efficiency public revolving fund.</li> <li>- CNED in consultation with Ministry of Energy and Ministry of Finance prepare the required legal documents to amend regulations to allow public institutions to deposit monetized energy saving in a revolving fund approved.</li> </ul>	<p>High</p>	<p>High</p>
<p>Public Institutions, potential beneficiaries of the EE fund</p>	<ul style="list-style-type: none"> <li>- Deposit monetized energy saving in a revolving fund approved.</li> <li>- Retrofitted building reduced O&amp;M costs</li> <li>- Increased comfort for users</li> <li>- Lower energy bill after paying back the investment</li> </ul>	<p>Medium</p>	<p>Medium</p>
<p>Project workers<sup>1</sup></p>	<ul style="list-style-type: none"> <li>- Beneficiaries of the capacity buildings activities.</li> <li>- Involvement in the implementation of all Project’s components and activities.</li> <li>- Occupational health and safety risks impacts.</li> <li>- Labor risks, non-compliance with legal provisions in the field of work.</li> <li>- Labor Management Procedures under the Project consistent with WB’s ESS2 will be developed. LMPs will include clear worker Grievance Mechanisms, including codes of conduct to prevent and manage incidents of SEA/SH. LMPs will include measures to prevent occurrences of harmful child or forced labor and that grievance mechanisms are available for direct and contracted workers. Activities that involve significant risk of child or forced labor will not be financed under the Project. Measures to mitigate the impact on worker health and safety will be included in the LMPs.</li> </ul>	<p>Medium</p>	<p>Medium</p>

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

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

<sup>1</sup> For the purpose of the Project the workers from communities (institutions/enterprises and people from communities of Project area or from the country) can be involved in the implementation of Project activities.

**5.1.2. Other Interested Parties**

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

*Table 5. Other Interested Parties and their Interest/Influence*

Authority	Role	Interest	Influence
<b>National</b>			
<b>Steering Committee</b> (tentatively created from Ministry of Energy, Ministry of Finance, CNED, World Bank reps)	<ul style="list-style-type: none"> <li>- Supervision of the Project</li> <li>- Ensuring the successful implementation of all Project components through the good collaboration between the governmental institutions to be beneficiaries and managers of the proposed investments under MEERM.</li> </ul>	High	High
<b>Implementation entities:</b> <ul style="list-style-type: none"> <li>- Ministry of Energy</li> <li>- CNED</li> </ul>	<p><b>MoE</b> will play the leading role in implementing the proposed project, while relying on its departments, sub-divisions, and subordinated agencies to provide technical support for implementation.</p> <p><b>CNED</b> directly responsible to MoE, will act as the lead implementing agency for the project and maintain fiduciary responsibilities for all components and will ensure efficient project implementation in relation to the MoE's obligations on social and environmental standards, procurement, financial management and other country-specific requirements such as monitoring and evaluation.</p> <p>A new PIU will be created and staffed with project funds. Procurement and contract management for all technical assistance, studies, and works, will be carried out by CNED PIU.</p> <p><b>The implementation entities</b> will ensure the Project implementation, including monitoring of the implementation of the ESMF, SEP, LPM and GRM.</p>	High	High
<b>Ministry of Finance</b> (the Borrower of the Project)	<ul style="list-style-type: none"> <li>- Approval of payments and financing. Monitoring of management of flow of funds.</li> <li>- Supporting the process of adjusting the legal framework for the implementation of the financing mechanism.</li> </ul>	High	High
<b>Central public administration</b> institutions management	<ul style="list-style-type: none"> <li>- Collaboration with implementation entities during the implementation of the component 2.</li> <li>- Monitoring and involvement in the implementation of the Project activities, including information of direct beneficiaries of the investments and technical assistance activities.</li> </ul>	High	High

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

<b>Ministry of Environment</b> Environment Agency Inspectorate for Environment Protection	- Environmental management, prevention of pollution, issue permits, environment control and monitoring, of biodiversity, soil, water and other natural resources.	Medium	High
<b>Ministry of Labor and Social Protection</b> /State Labor Inspectorate	- Local employment and labor conditions, vulnerable people.	Medium	Medium
<b>Local level</b>			
Local Public Authorities	-responsible for coordination and issue of some _permitting certifications field of urbanism, planning of municipal territory.  Intervene in cases of any accidents, protests or other related actions at local level/level of municipality they manage  interested in organizing and developing qualitative, safe and environmentally friendly public services	Medium	Medium
<b>Non-governmental associations</b>			
NGOs active in the field of EE and sustainable energy transition environmental protection and human rights NGOs and association active in the other connected areas	NGOs are viewed as important players, that influence decision-makers towards better EE solutions and also inspire and motivate society to act and demand meaningful public service provision, consistent to protection of interest of vulnerable groups and local communities. General interest in the implementation success of project activities; policy and technical implementation input/feedback; interest in representing local community interest, activities related to information, training, piloting, information exchange and learning and communication and monitoring. HR based NGOs (particularly active in the field of children rights protection and GBV prevention and response) could be involved as partners in case of any temporary relocation of GBV centers / children centers services will be needed.	Medium	Medium
<b>Mass media</b>			
National and regional/ local mass media, including the social media channels interested in EE topics	Media can support and publicize government policies and regulations related to energy efficiency, increasing their visibility and potential for success. Online news and social media can engage people by informing them about community energy projects and their benefits, fostering a sense of participation in the energy transition.	Medium	Medium
<b>International</b>			
<b>World Bank</b>	<b>Donor of the Project</b> The implementation entities will report to World Bank on implementation progress of the Project. Monitoring of the Project implementation	High	High

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

<b>Energy Community</b>	To contribute to the development of energy services, complementary to the Revolving Fund.	High	Medium
<b>Expertise France</b>	<i>Expertise France</i> provides support in identifying interventions in the Primary Regulatory Framework to implement the financing mechanism for EE fund	High	Medium
<b>Bilateral and International Donors</b>	Ministry of Energy hosts sectoral council in the field of foreign assistance, created based on Minister Decree nr 40 dated 20.11.2023 that regularly meets and discussed the priorities, synergies and potential cooperation among various donors. The project interventions shall be presented as a part of Information and coordination activity in order to maximize development impacts.	High	Medium
<b>Consultants and Contractors</b>	The Consultants and Contractors can be interested in the Project activities and timely and successful implementation if selected.	High	Medium

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

The Project recognizes that vulnerable people require special consideration, as they might be unable to participate, to the full extent, in the consultation activities, and may also be disproportionately affected by some impacts. The implementation entities will closely monitor the consultation process to ensure access and awareness of the Project benefits and to provide information on environmental and social impact mitigation measures to all affected and interested parties.

Considering the planned investment under the MEERM project, the groups of people can be considered disadvantaged or vulnerable during the implementation of the components 1, such as persons with disabilities, the elderly, children, low-income people, women, survivors of GBV and users of GBV shelters, will likely be users of retrofitted buildings.

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

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

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

Disadvantaged and vulnerable groups	Description of vulnerability / disadvantage	Interest	Influence
<b>Component 1 Energy efficiency and renewable energy investments in public buildings</b>			
<ul style="list-style-type: none"> <li>- Public buildings users with severe physical and sensory disabilities or other special needs</li> <li>- GBV shelters beneficiaries</li> <li>- Medical Centers service users, particularly Persons with Disabilities or other special needs or elderly</li> <li>- Low-income families/extreme poor and especially female headed households.</li> <li>- Roma communities.</li> <li>- Ukrainian refugees</li> <li>- Children beneficiaries of Temporary Placement Centers</li> <li>- Public building workers with disabilities or special needs.</li> <li>- Illiterate community population</li> <li>- Population of ethnic minorities</li> </ul>	<p>The vulnerabilities of these groups can be caused by the incapacity or the limited possibilities to have access to the information on Project's activities and its potential risks and implications, such as noise, dust vibration, exposure to hazardous materials and temporary access restriction during the works, of the risks to be affected by temporary disruption, suspension or relocation of services.</p> <p>Lack of interest in Project related information and which can lead to ignoring important information on any service provision relocation or disruption, or on any for health and safety risks.</p>	Low	Low

## 5.2. Summary of Project Stakeholder Needs

The following specific needs were identified for MEERM project:

Table 7. Summary of Project Stakeholder Needs

Stakeholder Group	Consultation Methods	Specific Needs (accessibility, large print, childcare, daytime meetings)
Governmental institutions	<ul style="list-style-type: none"> <li>• Official letters</li> <li>• Emails</li> <li>• Nontechnical summary documents</li> <li>• Progress reports</li> <li>• In -person meetings</li> </ul>	<ul style="list-style-type: none"> <li>• Official correspondence and nontechnical documents or progress reports to be shared in Romanian (official language)</li> <li>• Daytime meetings</li> </ul>
Local Public Authorities	<ul style="list-style-type: none"> <li>• Official letters</li> <li>• Emails</li> <li>• Nontechnical summary documents</li> <li>• Progress reports</li> <li>• In person meetings</li> </ul>	<ul style="list-style-type: none"> <li>• Official correspondence and nontechnical documents or progress reports to be shared in Romanian (official language)</li> <li>• Daytime meetings</li> </ul>
Staff of the public buildings/ Trade Unions	<ul style="list-style-type: none"> <li>• Official letters</li> <li>• Emails</li> <li>• In-person meetings</li> <li>• Nontechnical summary documents</li> <li>• Flyers</li> <li>• Posters</li> </ul>	<ul style="list-style-type: none"> <li>• Communication to go through Ministries and institution management.</li> <li>• Materials to be shared in Romanian</li> <li>• Proximity to the public buildings</li> <li>• Time bound meetings</li> </ul>
Public Building users	<ul style="list-style-type: none"> <li>• In-person meetings</li> <li>• Banners</li> <li>• Posters</li> <li>• Flyers</li> <li>• Social Media</li> </ul>	<ul style="list-style-type: none"> <li>• All materials to be shared in Romanian and Russian (and if necessary at other language of ethnic minorities)</li> <li>• Printed material to be in large font</li> <li>• Proximity to the buildings</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

	<ul style="list-style-type: none"> <li>• Viber, WhatsApp</li> </ul>	<ul style="list-style-type: none"> <li>• Time bound meetings</li> </ul>
Managers of the public buildings	<ul style="list-style-type: none"> <li>• Official letters</li> <li>• Emails</li> <li>• In-person meetings (e.g. consultations, workshops etc.)</li> <li>• Nontechnical summary documents</li> <li>• Flyers</li> </ul>	<ul style="list-style-type: none"> <li>• Communication to go through Ministries</li> <li>• Materials to be shared in Romanian and Russian</li> <li>• Proximity to the buildings</li> <li>• Time bound meetings</li> </ul>
GBV Shelters / Temporary Residential Centers for children residents	<ul style="list-style-type: none"> <li>• In-person meetings</li> <li>• Banners</li> <li>• Posters</li> <li>• Flyers</li> <li>• Social Media</li> </ul>	<ul style="list-style-type: none"> <li>• All materials to be shared in Romanian and Russian (and if necessary at other language of ethnic minorities/ residents) Printed material to be in large font</li> <li>• Proximity to the buildings</li> <li>• Time bound meetings</li> </ul>
Community close to the selected public buildings	<ul style="list-style-type: none"> <li>• Posters,</li> <li>• announcement on information board of public buildings, LPAs</li> <li>• social media</li> <li>• Flyers</li> </ul>	<ul style="list-style-type: none"> <li>• All materials to be shared in Romanian or Russian</li> <li>• Printed material to be in large font</li> </ul>
Contractors, Consultants and ESCOs	<ul style="list-style-type: none"> <li>• Official Letters</li> <li>• Emails</li> <li>• Web site</li> <li>• Social Media</li> <li>• In- person meetings</li> </ul>	All materials to be shared in Romanian and English
Vulnerable Groups	<ul style="list-style-type: none"> <li>• In-person meetings</li> <li>• Visits</li> <li>• Banners</li> <li>• Posters</li> <li>• Flyers</li> <li>• Social Media</li> <li>• Other methods and tools can be added, being identified during the meetings or discussions.</li> </ul>	<ul style="list-style-type: none"> <li>• All materials to be shared in Romanian and Russian (and if necessary at other language of ethnic minorities/ residents)</li> <li>• Printed material to be in large font.</li> <li>• Proximity to the buildings</li> <li>• Time bound meetings</li> <li>• Communication materials can be adapted to the needs of persons with different types of disabilities. This can be determined in the context of each subproject where necessary.</li> </ul>

## 6. STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle.

### 6.1. Engagement Methods to be Used

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

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

At the stage of SEP preparation, the potential beneficiaries of the activities and investments included in the Component 1 of the Project are not yet clearly identified. Consequently, the potentially identified beneficiaries will be informed and consulted on the Project's activities and design. Once the beneficiaries will be identified the consultation process will be continued in order to provide information regarding the

project to groups of beneficiaries throughout the duration of the Project's implementation (when necessary). Also, additional consultations will be held at the request of the beneficiaries or when the implementing entities will consider necessary to use this information and feedback tool during the implementation period. The feedback provided by the stakeholders during the consultation shall properly documented in the minutes of meetings or reports on consultation conducted, which will include the question, suggestion and proposals addressed by participants and the answers offered by organizer/moderators. In case of some proposals or suggestions shall be mentioned if they were accepted or the reason for their non-acceptance. The results of engagement activities shall be provided to the participants in dependence of type of event. The results of consultation can be submitted directly to the participants if the contact data is provided or can be placed on the web site, about which the participants will be informed during the event.

- **Field visits** - to identify the beneficiaries of the Project and to consult the stakeholders and monitor project implementation directly on the site (when will be necessary for regular monitoring of the Project's activities).
- **Workshops (in person or online)** – The workshops with experts will be held to consult on the implementation status and progress of the project and the revision and development of new policies and normative documents, e.g. the planned activities under component 1 and 2. Also, the workshops can be organized with the public institution managers on GRM operation and monitoring of the environmental and social aspects during the construction works. Other topics relevant for these workshops will be identified during project implementation.
- **Trainings and capacity buildings activities** – these methods and related tools will be used specifically in the context of the planned activities under component 1 of the Project by specialized and selected/contracted consulting companies and trainings institutions.
- **Leaflets/posters and summary information notes** – leaflets and summary information notes to be submitted to the Project's affected and interested parties in all the relevant languages. The leaflets and summary information notes can be included the information of the specifically aspects of the Project, such as the benefits of proposed investments and GRM. The information materials ca be distributed in the meetings/ public consultations, also can be placed on the information boards at selected public buildings, at LPA's offices, GBV and Children Residential buildings; at Health centers boards etc.
- **Information boards** - establish Information Boards in each Project area. On these boards will be placed the information related to the Project, relevant for every phase of Project implementation.
- **Individual meetings** –individual meetings will be held with the affected parties at their request, also with people from vulnerable groups (if such cases are identified) in order to find and implement solutions to some specific situations or issues.
- **Implementation entities websites and social media channels** – the web sites and social media channels of the implementing entities will be the main information tools during Project implementation. Short descriptions will be developed in an accessible and proper language for websites on benefits of planned investments, mitigation measures during the pre-construction and construction phases etc.
- **Letters** – the letters will be an instrument used to facilitate the Project implementation process through good collaboration between the implementing entities and other stakeholders.
- **Reports** – the reports will be used to monitor the Project implementation and to keep informed the main stakeholders of the Project.
- **E-mails** – to facilitate communication between implementing entities.
- **Grievance Redress Mechanism (GRM)** - GRM will be established in line with the World Bank's ESS10 requirements. A dedicated grievance mechanism will be set up for the Project by CNED. The stakeholders will be able to raise grievances anonymously by phone or online or using the project digital platform.
- **Grievance Log** - where grievances are registered (including grievance delivered by letter mail or in writing) and maintained, followed up and resolved through a database.

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

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

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

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

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

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

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

The table below provides a preliminary summary of the suggested information to be disclosed based on the Project design and topics that might be of interest to stakeholders.

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

Table 8. Information Disclosure Strategy

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
<b>Project preparation</b>					
All	Proposed Project Design; PAD	CNED web distribution via email.	Upon project approval	All	MoE, CNED
All	Draft ESCP, ESMF (including LMP), SEP.	CNED website; distribution via email. Summary description note of the ESMF and SEP can be submitted via email.	Prior to the Project appraisal	All	MoE, CNED
All	Final ESF documentation, including all comments and suggestions.	WB, CNED, websites; distribution via email.	Prior to the Project effectiveness	All	CNED
<b>Project implementation</b>					
Component 1	Drafts of the required legal documents on establishment of energy efficiency public revolving fund and of the required legal documents to amend regulations to allow public institutions to deposit monetized energy saving in a revolving fund approved.	MoE, CNED websites.	After drafts elaboration	All	MoE/ CNED
Component 1	Selection process of the beneficiary buildings, including the used criteria and the further stages.	MoE, CNED websites and social media. Meetings with the managers CPAs buildings.	Prior to start the selection process and at the end of the selection process.	Manager of the public buildings  Public Authorities	CNED

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

<b>Project component</b>	<b>List/ Type of information to be disclosed</b>	<b>Methods of disclosure proposed</b>	<b>Timing/Frequency</b>	<b>Target stakeholders</b>	<b>Responsible stakeholders</b>
Component1	Site-specific screening checklists/ESMPs	<p>Draft ESMPs, including temporary relocation plans, where relevant, consulted with the building users (both staff of public institutions &amp; users)</p> <p>Consultations prior any temporary disruption or temporary relocation plans.</p> <p>Post on the CNED and public institutions websites the draft ESMPs for review and feedback.</p> <p>Summary of these documents will be placed on informational boards placed at public buildings info boards, near sub-Project area and at LPAs.</p>	Prior some civil works begins	<p>Public building users and staff</p> <p>Community members near location of the proposed sub-project area.</p> <p>Beneficiaries of the investments and community member near location of the proposed sub-project area.</p>	CNED and Contractors
Component 1	C- ESMP GRM channels	<p>Post on the CNED and public institutions websites.</p> <p>Information about the GRM will be placed on informational boards placed near sub-Project area and at LPAs.</p> <p>Contractors will make the C-ESMP available at the project sites.</p>	Prior some civil works begin	Beneficiaries of the investments and community member near location of the proposed sub-project area.	CNED and Contractors

***Moldova Energy Efficiency Revolving Mechanism***

***Stakeholder Engagement Plan***

All	Project's progress reports, including implementation of the E&S requirements and provisions agreed at the preparation stage.	CNED website Email to WB and interested governmental institutions.	Quarterly	All	CNED
All	SEP and GRM implementation reports	CNED website	Semiannually	All	CNED
All	Project's Completion Report, including implementation of the safeguard requirements and plans.	CNED website Email to WB and interested governmental institutions	TBD	All	CNED

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

CNED will provide appropriate background and relevant technical or non-technical information to stakeholders' whose feedback is sought on with sufficient advance notice (5-10 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback.

The CNED team will gather (written and oral comments), review and summarize them and commit to report back to stakeholders on how those comments were incorporated, and if not, provide the rationale for reasons for why there were not within 10 to 30 working days from the stakeholder engagement event either.

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

- 1) By Email to the address: [office@cned.gov.md](mailto:office@cned.gov.md)
- 2) By landline correspondence: Chişinău, str. Albişoara 38, floor 4, MD-2005, Republic of Moldova
- 3) By telephone: (+373 22) 499 444

### 6.4. Future Phases of Project

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

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

Considering all information provided and described in this SEP above, the stakeholder engagement program is proposed for engaging relevant stakeholders throughout the Project cycle. It is important to keep in mind that the situation is dynamic and that some stakeholders and their interests might change over time. Thus, to keep the Project stakeholders informed about Project progress and implementation challenges throughout the Project cycle, the proposed stakeholder engagement program below covers all aspects of Project implementation, including compliance with both the national and World Bank environmental and social requirements.

## 6.5. Proposed Stakeholders Engagement Activities

The project intends to utilize various engagement methods as part of its continuous interaction with project affected parties and various stakeholders. To ensure effectiveness and meaningfulness, a range of techniques tailored to identified stakeholder groups will be applied. Methods for consulting various groups might differ and shall be adjusted based on each group’s specifics.

Every consultation activity should meet general accessibility requirements, such as being held at easily reachable venues without long commutes. They should also be culturally appropriate, respecting local customs and norms, and inclusive of all segments of society, including disabled persons, the elderly, minorities, and other vulnerable individuals. If necessary, logistical assistance should be provided to enable participation of individuals with limited physical abilities, and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques. Since their vulnerable status may lead to diffidence, reluctance, or physical incapacity to participate in large-scale community meetings, visiting them at home or holding separate small group discussions at an easily accessible venue can help reach out to groups who may otherwise be insufficiently represented at general meetings.

The table below includes suggested communication activities and methods that would be used to communicate and consult with the other parties and stakeholders:

*Table 9. Overview of planned communication and engagement activities of project affected parties*

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders
Preparatory stage	Specialized public central administration authorities: and managers of the public buildings owned by CPA	Individual and group meetings		Specialized public central administration authorities: and managers of the public buildings owned by CPA	Individual and group meetings
Implementation stage	Central public administration buildings management	Letters Consultation meetings Information Board Websites and social media Draft ESMPs consulted with the building users (both staff of public institutions & users)	Prior to start of the bidding process for construction works	The site-specific identified risks and impacts and proposed mitigation measures. Site Specific ESMP Temporary Relocation Plans Service disruption planning GRM.	CNED
			By start of the construction works	Summary information on the HS risks and	CNED / Contractors

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders
		<p>Consultations prior any temporary disruption or temporary relocation plans.</p> <p>Post on the CNED and public institutions websites the draft ESMPs for review and feedback.</p> <p>Summary of these documents will be placed on informational boards placed at public buildings info boards, near sub-Project area and at LPAs.</p>		<p>the protection measures during the construction works, which have to be respected by all in the site.</p> <p>GRM for affected parties and workers.</p> <p>The planned investments and benefits.</p>	
		Leaflets /Posters	To be distributed in the meetings – during Project implementation	Planned investment and benefits, GRM operation and other proposed mitigation measures.	CNED
		Website and social media	During all Project implementation	Planned activities, announcements, results and benefits.	CNED
	<b>Staff of public buildings/trade unions</b>	Consultation meetings	During the design stage	Potential risks and impacts identification. Options for mitigation of the ES risks and impacts, including access options, temporary relocation, etc	CNED
			Prior to start of the construction works	<p>ESMP</p> <p>The site-specific identified risks and impacts and proposed mitigation measures.</p> <p>Temporary relocation plans</p> <p>GRM.</p>	CNED / Contractors
		Information Board	By start of the construction works	Summary information on the HS risks and the protection measures during the	CNED / Contractors

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders
				construction works, which have to be respected by all in the site. GRM for affected parties. The planned investments and benefits.	
		Leaflets /Posters	To be distributed in the meetings – during Project implementation	Planned investment and benefits, GRM operation and other proposed mitigation measures.	CNED
		Website and social media	During all Project implementation	Planned activities, announcements, results and benefits.	CNED
	<b>Building users</b>	Consultation meetings Information Board Websites and social media	Prior to start of bidding processes for the construction works	ESMP. The site-specific identified risks and impacts and proposed mitigation measures. Service disruption Planning GRM. Works Schedule and the arrangements for the study process if any.	CNED/ Contractors
		Leaflets and social media	During subproject implementation, available at every school in the dedicated places for information.	Planned investment and benefits, GRM operation and other proposed mitigation measures.	
		Existing channels for communication with building users (e.g. Viber, WhatsApp ect.)	During subproject implementation	Works schedule. Health and safety measures. Access restriction. Some interruptions or changes to the program if any. GRM under the Project (all contact data related to subproject implementation)	CNED with support of building's administration
	GBV Shelters / Temporary Residential Centers		During the design stage	ESMP Potential risks and impacts identification.	CNED

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders
	for children residents (TBC)	Consultation meetings		Options for mitigation of the ES risks and impacts, including access options, temporary relocation, restrictions for service provision programmer and available options for works schedule. Necessary information to be provided and more acceptable channels and methods for information and engagement.	
			Prior to start of the bidding process for construction works	The site-specific identified risks and impacts and proposed mitigation measures. Service disruption planning GRM.	CNED
		Information notes and leaflets	At every main subproject stage	Health and safety. Works schedule. GRM.	CNED
		Leaflets	At subproject completion	Benefits of the investments. Operation requirements.	CNED
	Owners and employees of businesses that may be affected by works	Economic survey	During the design stage	Potential risks and impacts identification Options for mitigation of the ES risks and impacts, including access options, temporary relocation and assistance measures, need for and preparation of LRP. Necessary information to be provided and more acceptable channels and methods for information and engagement.	CNED
		Consultation meetings			
	Contractors and Consultants	Meetings Letters	If necessary or during the specific	Bidding / procurement procedures, contracts implementation,	CNED

Project stage	Stakeholder group	Engagement methods	Frequency/ Locations	Topics	Responsible stakeholders
			contracts' implementation	including the safeguards requirements implementation.	
	The community – residents who live near the buildings that will benefit from the investments	Information board at the construction site	Starting with the construction works	Planned works, their duration and expected benefits. The proposed mitigation measures during the construction works. GRM.	CNED/Contractors
		Individual and group meetings	At request	TBD	
	Government of Republic of Moldova, specifically MoE, CNED	Meetings Letters	When necessary	Development of the required documents, decisions and regulation as per national requirements.	MoE /CNED

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

Stakeholder group	Engagement methods	Frequency/ Locations	Topics		Responsible stakeholders
			Preparation & pre - construction	Implementation	
Implementation entities: MoE; CNED	Meetings Reports Letters and E-mail	When necessary	Design of stakeholders' engagement process. Selection of Consultant and Contractors. Project design. Set-up GRM. Other information.	Project monitoring. Implementation of ESMPs, SEP (including GRM), LMPs, and other safeguards requirements. Other information as requested.	MoE and CNED
Other national public Authorities and organizations	Letters Meetings	Before construction works begins	Information necessary for obtaining approvals, permits and/or for coordination of the documents, according to national laws. Other information as is requested.	TBD	MoE and CNED
LPAs.	E-mails and letters Meetings Public consultations CNED web site and social media	Following effectiveness of the Project When necessary  Continuously	Planned activities. GRM operation. Other aspects identified during the Project implementation.	Subprojects monitoring. Implementation of ESF, ESMPs, SEP (including GRM), LMPs and other safeguards requirements. Other information as requested.	CNED
Mass media, NGO	Letters Press-releases Meetings Public consultations CNED website and social media	During all Project implementation	Objective and benefits of the Project. Project implementation progress. Other information if requested	Start and progress of the construction works. Results and benefits. Information on request.	MoE and CNED

Consultants and Contractors	Letters, E-mails, Meetings	When necessary	Procurement process. ESMPs, LPMs, Code of Conduct elaboration and coordination. Development of design. Other information as requested.	Contracts implementation. Implementation of ESMPs, SEP, LMP and GRM. Other information as requested	CNED
Financial institution (WB)	Letters E-mails	When necessary	Bidding Documents. Pre-construction Planning. Safeguards documents development. GRM set-up. Other information.	Project implementation progress. Implementation of ESF, ESMPs, SEP (including GRM), LMP and resettlement activities. Other information as requested.	CNED
	Meetings	During Supervision mission			
	Reports	Quarterly			

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

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

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

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

*Table 11. Strategy for inclusion and communication with vulnerable groups*

Target groups	Strategy
<ul style="list-style-type: none"> <li>- Public buildings users with severe physical and sensory disabilities or other special needs</li> <li>- GBV shelters beneficiaries</li> <li>- Medical Centers service users, particularly Persons with Disabilities or other special needs or elderly</li> <li>- Low-income families/extreme poor and especially female headed households.</li> <li>- Roma communities.</li> <li>- Ukrainian refugees</li> <li>- Children beneficiaries of Temporary Placement Centers</li> <li>- Public building workers with disabilities or special needs.</li> <li>- Illiterate community population</li> <li>- Population of ethnic minorities</li> </ul>	<ul style="list-style-type: none"> <li>• Engagement of local NGO’s who work with vulnerable people at the community level to help disseminate information and organize consultations.</li> <li>• Separate consultation sessions (e.g., meetings and focus group discussion).</li> <li>• CNED will use various communication measures including all relevant NGOs to reach out different vulnerable groups.</li> <li>• Continuous information provisions using the various channels and methods.</li> <li>• Proactive involvement in the Project implementation of the institutions managers and LPAs in order to ensure the information and engagement of all vulnerable groups that can be affected by the Project.</li> </ul> <p>Project related information must be provided in a manner that can be understood by variety of stakeholders and adapted to their special needs or particular requirements. For example, translated to minority languages or adapted for different types of disabilities, as relevant</p>

## **7. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES**

### **7.1. Implementation Arrangements**

The project will be implemented by the Ministry of Energy through CNED. A new PIU will be established within CNED to manage the project. Staff with experience in environmental and social management including occupational and community health and safety will be hired or appointed as part of this PIU when project funds become available during implementation.

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

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

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

*Table 12. Roles and Responsibilities in SEP Implementation*

<b>Actor/Stakeholder</b>	<b>Responsibilities</b>
CNEDs PIU team,  Environmental and Social specialists	<ul style="list-style-type: none"> <li>- Plan, implement and monitor SEP activities;</li> <li>- Lead and coordinate stakeholder engagement activities;</li> <li>- Collect stakeholder feedback through public consultation and group meetings and bilateral meetings;</li> <li>- Coordinate/supervise the contractors on SEP activities;</li> <li>- Monitor and report on environmental and social performance to the Government institutions and WB;</li> <li>- Supervising compliance of the implementation of the engagement activities with the WB safeguards requirements;</li> <li>- Organization of the planned SEP activities;</li> <li>- Regular communication with mass media and NGOs to reflect the Project's implementation progress;</li> <li>- Development of brochures, leaflets, poster, information board content;</li> <li>- Monitors and to measures the Project's indicators related to the implementation of this SEP and GRM as will be provided in the Project's Financial Agreement to be signed;</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan**

	<ul style="list-style-type: none"> <li>- Maintains the stakeholder engagement register (dates, list of participants, makes a summary of feedback provided and helps draft the summary response on how the stakeholder feedback was incorporated in implementation and if not, provide the rationale);</li> <li>- GRM operation, creating and keeping the GRM Register for the Project;</li> <li>- Supervise/monitor and coordinate activities with the Project management to ensure that staff and all sub-contractors comply with the SEP;</li> <li>- Manage the day-to-day working, utilization, implementation of SEP by all parties engaged on the Program;</li> <li>- Review and updated the SEP ensuring compliance in terms of Environmental, Occupational Health and Safety requirements.</li> </ul>
<p>Managers of buildings of specialized central public administration authorities</p>	<ul style="list-style-type: none"> <li>- Inform the staff and buildings users on Project’s planned activities and on the progress during the implementation;</li> <li>- Inform the staff and buildings users on environmental and social impacts mitigation measures, including HS and GRM;</li> <li>- Involved in the GRM operation at local level, creating and keeping the GRM Register at subproject level.</li> <li>- Weekly and monthly reporting to CNED related to GRM operation and SEP implementation. Collaborate with CNED and other Project’s implementation entities in order to ensure successful and timely Project’s objectives achievement.</li> </ul>
<p>Contractors/subcontractors/Supervision consultants</p>	<ul style="list-style-type: none"> <li>- Inform CNED of any issues related to their engagement with stakeholders; Redirect to the CNED the grievances caused by the construction activities or received on the site;</li> <li>- Prepare, disclose and implement various plans (e.g. C-ESMP, C-LMP, etc.);</li> <li>- Inform the beneficiaries of the investments or local communities of any environmental and HS mitigation and monitoring measures;</li> <li>- Inform the workers on the available GRM for workers;</li> <li>- Inform local communities on GRM at Project level;</li> <li>- Creating and keeping the GRM Register at subproject level with construction.</li> <li>- Announce important construction activities (such as restriction of access and available alternatives).</li> <li>- Weekly and monthly reporting to CNED related to GRM operation and SEP implementation.</li> <li>- Report immediately to the CNED the complaints regarding significant or serious incidents including SEA/SH.</li> </ul>
<p>Project Affected Parties</p>	<ul style="list-style-type: none"> <li>- Invited to engage and ask questions about the Project in the meetings and through discussions with the implementation entities;</li> <li>- Lodge their grievances using the GRM;</li> <li>- Help the implementing entities to define the appropriate mitigation measures.</li> </ul>

### **7.3. Estimated Budget**

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

It should be noted that Constructor s' budgets should include the costs of SEP implementation, in view of activity specific stakeholder consultations and information dissemination for building rehabilitation/construction.

## **8. GRIEVANCE REDRESS MECHANISM**

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

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

### **8.1. Definition of GRM**

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

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

### **8.2. GRM scope and use**

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

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

*GRM's management:* The GRM for MEERM Project will be managed by the CNED.

### **8.3. Procedures - Grievance Resolution Framework**

#### **8.3.1. Grievances submission**

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

<b>National Center for Sustainable Energy (CNED)</b>
--

Chişinău, str. Albişoara 38, et. 4, MD-2005, Republica Moldova
--

Phone 0-8005-5005
-------------------

<a href="mailto:office@cned.gov.md">office@cned.gov.md</a>
--

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

Within CNED, the Operational Procedure on the Functioning of the **Institutional Information Line** of the Public Institution National Center for Sustainable Energy has been approved by order of the Director. This Procedure regulates the organization, functioning, and control of the institutional information line, established to ensure transparency of the institution's activities and interaction with citizens and beneficiaries of the Programs implemented by the CNED.

The purpose of the Procedure is to ensure accurate and transparent information for citizens and beneficiaries of the Programs implemented by the CNED.

**Subprojects/sub-activity level:** The any type of feedback related to implementation can be submitted to management of public buildings or to persons to be appointed by the managers to be responsible for the implementation of the activity.

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

The GRM procedure will be updated based on data provided by management of the beneficiary public buildings for every subproject, including the appointed person for GRM management at subproject level, available communication channels with institution workers, users and other affected parts

Grievances may be submitted anonymously using the dedicated phone numbers or email.

All anonymous grievances and complaints should be addressed and recorded as well as other grievances and complainants, Confidentiality must be ensured in all cases, including the case when the person submitting the appeal choses anonymity.

### *SEA/SH Complaints*

The Project treats sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the WB ESF Good Practice Note on SEA/SH.<sup>2</sup> For GBV, and particularly for SEA/ SH complaints, there are risks of stigmatization, rejection and reprisals against survivors.

Taking into account the standards regarding the prevention of SEA/SH, which, in accordance with the requirements of the World Bank, must be observed in all projects financed by the World Bank, these standards

---

<sup>2</sup> <https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf>

*Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan*

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

When receiving SEA/SH related complaints, the person receiving the complaint should not ask for or record any information beyond the following aspects:

- the nature of the allegation—what a survivor says in his or her own words without direct questioning;
- if, to the best of the survivor’s knowledge, the perpetrator is associated with the project;
- when possible, the age and sex of the survivor; and
- when possible, information about whether the survivor was referred to services.

The person to whom the SEA/SH allegation is disclosed requests the consent of the survivor to share some nonidentifiable data with the implementing agency and the World Bank regarding the type of incident, if the alleged perpetrator is associated with the project, the age and sex of the survivor (if available), and whether the survivor was referred to services. In the absence of consent, there should be absolutely no data sharing, in line with the principle of survivor-centricity. If a survivor gives consent, the SEA/SH allegation recipient reports the anonymized SEA/SH incident as soon as it becomes known to CNED, who will in turn inform the World Bank. The following key pieces of data must be shared: (1) the nature of the allegation; (2) if the alleged perpetrator is, to the survivor’s best knowledge, associated with the project (yes/no); (3) the survivor’s age and/or sex (if available); and, (4) if the survivor was referred to services.

The person receiving the complaint acknowledges receipt of the grievance and provides honest, clear, and complete information about services available from the various agencies that may be able to assist the survivor, as well as details on how to access them. Survivors should be given adequate information to provide informed consent and should understand that they have the right to place limitations on the type of information they want shared and to specify which organizations can and cannot be given the information. The survivor’s consent must be documented. Ultimately, it is up to the survivor, and only the survivor, whether to take up the proposed referrals.

We use this SEP to provide contacts where to receive support:

- SEA/SH green-line 0 8008 8008. This is a green line for women and girls suffering from domestic abuse, victims of trafficking in human beings, victims of sexual exploitation.
- Specialized counseling for victims of domestic violence 0 8008 0000 022 811 999 / 068855050 (Women's Law Center)

The list of GBV service providers/ specialized Human Rights NGOs is available <https://sdvmd.net> and at <https://anpcv.gov.md/ro/asistententa.html>

- emergency line 112 service also will redirect all calls coming from women-victims of domestic violence to the Trust line for Women and Girls, in the cases when the beneficiary refuses police intervention or is in a

*Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan*

state of crisis and requires emotional support and psychological counselling. The redirection will also happen when the beneficiaries will need information about their rights and the services available to them.

The SEA / SH issues will require adoption of certain additional measures:

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

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

*World Bank's corporate Grievance Redress Service*

The Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of WB noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS),

please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

### *8.3.2. Grievances receipt and recording*

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

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

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

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

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

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

### *8.3.4. Grievance Closure*

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

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

*Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan*

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

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

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

*The answers to the anonymous grievances will be placed on CNED's website and on information boards at subproject level.*

#### *8.3.4. Monitoring and Reporting*

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

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

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

CNED's Social Specialist will compile the information provided from subprojects and will develop quarterly reports to Project's management and to the World Bank.

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

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

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

- The number of grievances logged in the proceeding period by level (at project or subproject level) and category and type.
- The number of the solved grievances, including the answers provided to the questions, requests for information, suggestions and proposals and other received feedback through the Project's GRM.
- The number of the grievances under examination.
- The number of the grievances with the accepted resolution.
- The number of the grievances with the partially accepted resolution.
- The number of the grievances with the not accepted / rejected resolution.
- The most frequent questions and requests/suggestion/proposals or feedback.

*Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan*

- The planned or carried out actions and measures based on received feedback, such as for example: informational materials development on specific subjects, additional information provided using the social media channels and, groups meetings or workshop with a specific stakeholders group etc.

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

#### *8.3.5. Information on GRM*

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

### **8.4. Roles and Responsibilities for GRM**

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

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

The table below outlines the indicative distribution of responsibilities among the relevant project actors for each GRM function identified in this subsection.

*Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan*

<b>GRM Function/Activity</b>	<b>Responsible Actor (s)</b>
Overall management of the GRM system	PIU Social Specialist
Developing and maintaining awareness-building (GRM communication, outreach materials, public info)	PIU Social Specialist; PIU Communications Specialist
Collection of complaints	PIU Social Specialist; Contractors' GRM appointed persons; Managers of public/administrative buildings
Recording complaints (logging into GRM register)	PIU Social Specialist
Notifying complainants regarding receipt and timeline for review	PIU Social Specialist
Sorting/categorization of complaints	PIU Social Specialist; PIU Environmental Specialist; PIU Engineer
Examination/investigation of issues, including causal link to project activities	PIU Social Specialist (lead); PIU Environmental Specialist; PIU Engineer; Contractor Representatives
Decision-making on resolution options	PIU Social Specialist (recommendation); PIU Project Manager (approval);
Processing appeals/continuous communication with complainants	PIU Social Specialist; PIU Project Manager
Publishing responses and GRM summaries (unless privacy requested)	PIU Social Specialist; PIU Communications Specialist
Organization and implementation of information materials and awareness campaigns	PIU Social Specialist; PIU Communications Specialist
Reporting and feedback on GRM results (internal and to the World Bank)	PIU Social Specialist

The PIU Social Specialist, who will have overall responsibility for managing the GRM, will ensure that the roles and responsibilities of the relevant actors are clearly defined and properly followed.

CNED shall ensure that specific training regarding the GRM for project staff and related parties.

Training needs to be provided to all parties that have responsibilities under the GRM including operators of the institutional information line, building owners and administrators, contractors, consultants and CNED staff.

Each person must know the principles and process of the GRM to ensure complaints are properly classified and addressed. I suggest that this training be provided at the beginning of the project with CNED staff and in the context of each subproject with owners, users, contractors, community leaders, etc.

Specific training on handling SEA/SH complaints shall be done will also have relevant measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. The E&S specialists of the project implementation unit within CNED will be trained to handle such cases.

*Moldova Energy Efficiency Revolving Mechanism  
Stakeholder Engagement Plan*

CNED shall ensure that dedicated and comprehensive training on the Grievance Redress Mechanism (GRM) is provided to all project staff, and relevant stakeholders. This training must cover the full set of actors who carry responsibilities under the GRM, including operators of the institutional information line, building owners and administrators, contractors, consultants, community representatives, and CNED staff.

All individuals involved must clearly understand the principles, scope, procedures, and documentation requirements of the GRM to guarantee that grievances are properly received, registered, classified, addressed, and closed in a timely and transparent manner. It is recommended that this training be delivered at the outset of the project for CNED personnel, and subsequently, within the context of each subproject, for building owners, users, contractors, community leaders, and any other local stakeholders. This will ensure that everyone involved has consistent and up-to-date knowledge on how grievances should be managed at each level of implementation.

In addition, specialized training on handling complaints related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) shall be conducted. Such training will equip responsible staff with the skills and tools needed to appropriately respond to sensitive, confidential, and high-risk complaints in accordance with survivor-centered principles. The project will establish and maintain all necessary measures and protocols to safely receive, document, protect, and refer SEA/SH cases, ensuring strict confidentiality and the protection of affected persons. All procedures will follow the World Bank's Environmental and Social Framework (ESF) Good Practice Note on SEA/SH.

Social Safeguards specialist within the CNED Project Implementation Unit will receive advanced training to handle SEA/SH allegations, including proper reporting channels, ethical requirements, referral pathways to support services, and coordination with relevant national institutions. This will strengthen the project's capacity to manage SEA/SH risks and ensure that all complaints are treated with professionalism, sensitivity, and integrity.

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

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

The Contractors should consider streamlined procedures to address specific worker grievances, which would allow workers to quickly report labor issues, such as a lack of PPE, lack of proper procedures or unreasonable overtime, and allow the project to respond and take necessary action.

The CNED's social specialist and environmental, health and safety specialist will also provide overall implementation and capacity building support on resolving all workers grievances. They will also include workers grievance status in the progress report. The Grievance Mechanism for Project's workers are detailed in the Labor Management Procedures prepared for the Project.

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

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

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

### **9.1. Progress Reports**

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

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

## **10. REFERENCES**

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

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

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

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

## 11. ANNEXES

### Annex 1: Grievance/inquiry record

<b>GRIEVANCE/INQUIRY RECORD</b> (Form A)			
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attach any supporting documentation/letters as relevant.</i>			
<b>Date Grievance Received:</b>		<b>Name of Staff Completing Form:</b>	
<b>Grievance Received (check <input checked="" type="checkbox"/>):</b> <input type="checkbox"/> National <input type="checkbox"/> Raion <input type="checkbox"/> Village			
<b>Mode of Filing Inquiry or Grievance (check <input checked="" type="checkbox"/>):</b> <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Website  <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other___			
<b>Name of Person Raising Grievance: (information is optional and always treated as confidential)</b>  <b>Gender:</b> <input type="checkbox"/> Male <input type="checkbox"/> Female			
<b>Address or contact information for Person Raising Grievance: (information is optional and confidential)</b>			
<b>Location where grievance/problem occurred [write in]</b>			
<b>National:</b>		<b>Raion:</b>	<b>Village:</b>
<b>Brief Description of Grievance or Inquiry: (Provide as much detail and facts as possible)</b>			
	Category 1	Social Safeguards	
	Category 2	Environmental Safeguards	
	Category 3	Grievances regarding violations of policies, guidelines and procedures	
	Category 4	Grievances regarding contract violations	
	Category 5	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns	
	Category 6	Grievances regarding abuse of power/intervention by project or government officials	
	Category 7	Grievances regarding CNED/MEERM staff performance	
	Category 8	Reports of force majeure	
	Category 9	Grievance about project interventions	
	Category 10	Other	
<b>Who should handle and follow up on the grievance:</b>			
<b>Progress in resolving the grievance (e.g answered, being resolved, settled):</b>			

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

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

**Annex 3: Public Consultation Report**

**SEP has been consulted alongside with the ESMF documentation and can be found at ESMF project document**