2026

Stakeholder Engagement Framework

Climate resilience in water resources management project

Version 2

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2 List of abbreviations

Abbreviation	Full form
ARiMR	Agency for Restructuring and Modernization of Agriculture
CAP	Common Agricultural Policy
C-ESMP	Construction Environmental and Social Management Plan
CJEU	Court of Justice of the European Union
CLO	Community Engagement Officer
DEC	Decision on Environmental Conditions
EAFRD	European Agricultural Fund for Rural Development
EC	The European Community (as referred to in directives prior to the Treaty of Lisbon)
EFRG	European Agricultural Guarantee Fund
EIA	Environmental Impact Assessment
EIA Act	Act of October 3, 2008, on Access to Information on the Environment and Its Protection, Public Participation in Environmental Protection, and Environmental Impact Assessments
EPP	Emergency Preparedness Plan
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (World Bank)
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard(s)
ESS1	Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
ESS10	Environmental and Social Standard 10: Stakeholder Engagement and Disclosure
ESS2	Environmental and Social Standard 2: Labor and Working Conditions
ESS4	Environmental and Social Standard 4: Community Health and Safety
ESS5	Environmental and Social Standard 5: Land Acquisition, Land Use Restrictions, and Involuntary Resettlement
EU	European Union
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), Official Journal of the European Union L 2016/119.1 of April 4, 2016
GRM	Grievance Redress Mechanism
Investor	State Water Management Authority Polish Waters" Regional Water Management Directorate
IPIP	Investment Implementation Permit (a decision issued under the special flood control act)
KOWR	National Center for Agricultural Support
KPA	Act of June 14, 1960—Code of Administrative Procedure
KRUS	Agricultural Social Insurance Fund
KZN	National Land Fund
LARAF	Land Acquisition & Resettlement Action Framework
LARAP	Land Acquisition & Resettlement Action Plan
NSA	Supreme Administrative Court
OPS	Obligation to Reconstruct Networks
OTH	Other interested Parties
PAP	Project Affected Persons
PCU	Project Coordination Unit
PGW WP	State Water Management Authority "Polish Waters"
PIU	Project Implementation Unit – State Water Management Authority "Polish Waters" Regional Water Management Directorate in Wrocław, Kraków, Rzeszów, and Warsaw
RDOŚ	Regional Director for Environmental Protection
Regulation of the Ministry of Development and Technology of 2023	Regulation of the Minister of Development and Technology of September 5, 2023, on plot valuation

Abbreviation	Full form
RP	Republic of Poland
RZGW	Regional Water Management Authority
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEF	Stakeholder Engagement Framework
SEF	Project Level Stakeholder Engagement Framework
SEIA	Strategic Environmental Impact Assessment
SEP	Stakeholder Engagement Plan
SN	Supreme Court
SP	State Treasury
Special Act on Flood Protection	Act of July 8, 2010, on Special Rules for the Preparation and Implementation of Projects Concerning Flood Control Structures
Special Road Act	Act of April 10, 2003, on Special Rules for the Preparation and Implementation of Public Road Projects
TA Consultants	Technical Assistance Consultants
TO	Permanent Restrictions on the Use of Plots
UGN	Act of August 21, 1997, on Real Estate Management
WSA	Provincial Administrative Court
ZRID	Road Construction Permit

3 Definitions

Concept	Definition
Cut-off date	The final date of the IPIP or RIIP decision, in accordance with the applicable procedure for implementing the Task. If the decision is declared immediately enforceable, the cut-off date is the date on which such enforceability is declared. Upon the expiration of this date, the PAP list of those eligible for compensation and assistance is closed. The cut-off date is intended to identify and register all persons residing in the area covered by the Task, along with their property, the manner in which the plots are used, and their rights—regardless of whether they hold formal legal titles—as well as to ensure that persons affected by the Task receive compensation at the replacement cost. As of the cut-off date, the list of persons eligible for compensation and support is closed. Heirs and other legal successors of persons who held rights prior to the cut-off date retain those rights. Persons who settle within the Task area, construct structures there, or begin using the land after the cut-off date are not eligible for compensation. The surveys needed to finalize the list of PAPs shall be completed prior to the cut-off date, with the possibility of updates prior to the commencement of works, to ensure that PAPs' status and entitlements remain contemporary. The cut-off date will be made public and communicated directly to the affected community during public consultations in accordance with the relevant procedures.
Economic Displacement	Loss of access to productive resources, sources of income, or means of livelihood, even if the person does not have to physically change their place of residence. The following are considered particularly significant: loss of agricultural land ≥ 10% of income-generating area, disruption of economic activity resulting in a decline in revenue of ≥ 20% or downtime > 3 months.
Entitlement Matrix	A table specifying the categories of persons eligible for compensation and the types of benefits to which they are entitled, prepared on the basis of Polish law and ESS5 requirements.
Grievance	Any verbal or written expression, named or anonymous – in the form of a complaint, question, suggestion, request, opinion or grievance concerning the preparation or implementation of the Task, which requires a response, explanation or corrective action by the project team.
GRM register	A database containing all reports about grievances and feedback filed through project GRM channels along with information about the entities reporting, the status of consideration, actions taken, and results.
Immediate enforceability	A clause attached to the IPIP decision by the first-instance authority, resulting in the decision being enforceable before it becomes final—i.e., before any appeals are considered. If the decision is made immediately enforceable, the investor may carry out land acquisition before any appeal is resolved. However, the Contractor may not enter any plot of land until at least a 70% advance payment of the compensation amount specified in the appraisal report has been made available

Concept	Definition
	to the PAP. Physical displacement of the PAP must be completed before the Contractor takes physical possession of the plot and the full compensation is paid or made available to the PAP.
Meaningful consultation	A two-way process of information exchange that begins at an early stage of the Project and is conducted continuously, free from manipulation or coercion, ensuring that stakeholders have the opportunity to express their opinions and influence project decisions including siting and design.
Other Interested Parties	Entities that may have an interest in the Project, influence its course, or may be affected by its wider, indirect effects, but do not fall within either category of PAP above
Physical Displacement	A situation in which individuals must leave their current place of residence as a result of the implementation of the Task.
Project	The Climate Resilience in Water Management Project (CRWMP), funded by the World Bank and implemented by PGW Polih Waters, comprises a number of components and tasks, under which specific investment projects related to flood protection and increasing resilience to climate change are carried out.
Project Affected Person	Individuals, households, and entities directly affected by the Project. This includes **(a)** those affected through land acquisition, resettlement, loss of livelihood, or loss of access to resources, as defined under ESS5, and **(b)** those affected by construction-related impacts (e.g., noise, dust, traffic disruption, temporary restrictions on access), consistent with the broader definition of affected parties under ESS10..
Replacement Cost	The value of assets sufficient to replace lost property and cover the associated transaction costs. For land: the market value prior to expropriation plus transaction costs. For buildings: the cost of reconstruction to an equivalent standard. Where the market value equals the replacement cost—as a result of the principle of benefit applicable in Poland—the market value is taken as the basis for compensation.
Significant Impact	An impact classified under at least one of the following categories: (1) physical displacement, (2) economic displacement, (3) loss of access to strategically important resources. Classification as a significant impact entitles the affected person to the full package of compensation and support measures specified in the eligibility matrix.
Stakeholders	Individuals, groups, or institutions that: (a) are affected or may be affected by the project (project-affected parties), including project-affected persons (PAPs), local communities, and vulnerable groups; or (b) may have an interest in the project (other stakeholders), including public authorities, non-governmental organizations, and the general public.
Subtask	A specific investment carried out as part of the Project, constituting a separate organizational and material unit within the structure of a Component and/or Task. A Subtask encompasses a construction project or other environmental intervention, including land transformation or a change in land use, carried out by a specific contractor in a designated area. Under this LARAF, individual Subtasks constitute the basic unit of reference for planning and implementing activities related to land acquisition and resettlement activities.
Vulnerable individuals or group(s)	Those who may be more likely to be adversely affected by project impacts and/or more limited than others in their ability to take advantage of project benefits. Such individuals or groups are also more likely to be excluded from, or unable to participate fully in, the mainstream consultation process and may therefore require specific measures and/or assistance. Relevant considerations include age (the elderly and minors, including where they may be separated from family or other dependents), disability, digital exclusion, and other factors identified through screening and engagement with the community.

4 Executive summary

This Project level Stakeholder Engagement Framework (SEF) sets out the principles, structure, and procedures governing stakeholder engagement throughout the lifecycle of the Climate Resilience in Water Management Project, implemented by the State Water Management Holding "Polish Waters" (PGW WP) with World Bank co-financing. The Project aims to reduce flood and drought risk across Poland, ultimately protecting up to 5 million people, through structural and

nature-based interventions in the Upper and Middle Vistula and Odra River basins, institutional strengthening in forecasting and water resource management, and modernization of national water management systems.

Operations and activities for which the World Bank`s Investment Project Financing (IPF) is sought after October 1, 2018, fall under the application of the Environmental and Social Framework (ESF) The ESF comprises, inter alia, the 10 Environmental and Social Standards, which set out mandatory requirements for the Borrower and the Project.

Given the Project's scale and the risks associated with large-scale physical and economic displacement under several Tasks, the SEF establishes a framework-level instrument consistent with World Bank ESS10 and Polish law. The SEF establishes the institutional arrangements for stakeholder engagement by defining the roles and responsibilities of the Project Coordination Unit (PCU), the PIUs, and the Technical Assistance (TA) Consultants throughout the stakeholder engagement process. Responsibilities are assigned across the following key functions:

- Stakeholder identification and analysis, including the identification of disadvantaged and vulnerable groups,
- Timely disclosure of Project information; and
- Conducting meaningful consultations ensuring that engagement is inclusive, culturally appropriate, and undertaken in a manner free from manipulation, interference, coercion, discrimination, or intimidation
- Documenting, reporting, and incorporation of stakeholder feedback into Project planning and decision-making, including the operation of the Project Grievance Mechanism.

The SEF further establishes a methodology for stakeholder identification and analysis, including a stakeholder engagement matrix distinguishing Project-Affected Persons (PAPs) from other interested parties, and a dedicated strategy for engaging vulnerable groups, regardless of the drivers of vulnerability, including those facing barriers to participation. It further establishes a Project level Grievance Redress Mechanism (GRM) accessible to all stakeholders, with defined resolution timeframes. Stakeholders will be sensitized with SEA/SH reporting pathway based on a survivor-centered approach, and monitoring and reporting arrangements to track implementation. A dedicated Accountability and Response Framework and specific protocols for SEA/SH-related consultations are set out in Section 9.8.

The SEF will be publicly disclosed in Polish and English prior to the Project appraisal. It will be updated as the Project evolves or as new social risks emerge, and any significant changes will be subject to Bank approval.

5 Introduction

5.1 Project objectives

Poland is among the European countries most vulnerable to the effects of climate change on water resources. Since 1951, average temperatures in Poland have risen by more than 2°C, resulting in increased frequency and intensity of floods and prolonged droughts. At the same time, the storage capacity of Polish reservoirs amounts to less than 6% of annual river flows — one of

the lowest rates in Europe. During dry years, water availability drops to approximately 1,100 m^3 per person at which level reliable water supply for agriculture, the energy sector, and the population cannot be assured. The consequences of flooding can result in losses of billions of dollars, as illustrated by the flood caused by Low-Pressure System Borys in September 2024.

The overarching objective of the Project is to reduce flood and drought risks in Poland. The Project aims to ultimately provide protection for up to 5 million people. The Project pursues this objective through the following specific objectives:

- reducing flood risk in the upper and middle Vistula River catchment and in the Biała Lądecka River catchment within the Nysa Kłodzka River catchment through the construction of dry polders to protect major urban areas;
- reducing the risk of drought nationwide by increasing retention capacity, including the construction of multifunctional retention reservoirs and the implementation of green water retention measures;
- strengthening institutional capacity in the areas of forecasting and early warning for floods and droughts, water resource management, and water quality monitoring;
- improving institutional preparedness at the national level by modernizing water management systems using digital tools.

5.2 Project components

The Climate Resilience in Water Management Project comprises four components, each consisting of specific Tasks. The breakdown of the project into main Components and Tasks is presented in the table below.

Table 1 Division of the Project into Components and Tasks

Task List		
Code	Component / Task	
I	**Component 1: Enhancing resilience to climate risks in the Upper and Middle Vistula River Basin**	
I.1	Flood risk reduction in the Vistula River Basin to protect Kraków	
I.2	Flood risk reduction from Kraków to Zawichost	
I.3	Modernize the Sulejów water reservoir	
I.4	Enhance nature-based water retention in the Upper Vistula River Basin	
II	**Component 2: Enhancing resilience to climate risks in the Middle Odra River Basin**	
II.1	Construct the Kamieniec Ząbkowicki multifunctional reservoir	
II.2	Flood risk reduction in the Biała Lądecka catchment of the Nysa Kłodzka	
II.3	Enhance nature-based water retention in the Nysa Kłodzka catchment	
II.4	Enhance forest retention in the upper part of the Nysa Kłodzka catchment	
III	**Component 3: Strengthen institutional capacity in mitigating the impact of floods and droughts**	
III.1	Enhance flood risk reduction in the Nysa Kłodzka catchment by non-structural measures	
	III.1.1	Strengthen the forecasting and early warning system (FEWS) and alerting in the Nysa Kłodzka catchment
	III.1.2	Pilot program for floodproofing in the Nysa Kłodzka catchment
	III.1.3	Flood-resilient urban transformation study for Stronie Śląskie Municipality

Task List		
	III.1.4	Flood-resilient urban transformation study for Lądek-Zdrój Municipality
III.2	Strengthen the forecasting, warning and alerting system in the Iłownica and Biała catchments (Little Vistula Basin)	
III.3	Integrate the water quantity and water quality monitoring	
III.4	Modernize and develop of RZGW Operational Centers in the Vistula and Odra basins	
III.5	Establish and populate of the Water Management Information System for drainage infrastructure	
III.6	Prepare the Master Plans for the key stretches of the Vistula and Odra River Basins, integrating flood protection, drought mitigation and economic objectives	
III.7	Establish The Hydroclimate Monitoring Center in IMGW-PIB	
III.8	Develop the Crisis Management Centers	
IV	**Component 4: Project Management, Monitoring and Evaluation**	
IV.1	Project Management, Monitoring and Evaluation	

Within the project area, investments associated with Project components may be implemented as a part of the Project. These may include, in particular, riverbed regulation, the relocation of technical infrastructure that conflicts with hydrotechnical structures, and the construction of internal and access roads. These investments are financed as part of the Project and are not Associated Facilities within the meaning of ESS1.

5.2.1 Component 1: Enhancing Resilience to Climate Risks in the Upper and Middle Vistula River Basin

Component 1 includes infrastructure investments aimed at reducing flood risk in the upper and middle Vistula River Basin. The tasks implemented under this component involve the construction of dry polder systems, which, by temporarily retaining part of the flood wave and controlled discharge, reduce peak flow at critical river sections. Component 1 combines flood protection with building climate resilience, mitigating social and economic losses, and strengthening the capacity of public institutions to respond to extreme events.

5.2.1.1 I.1 Flood risk reduction in the Vistula River Basin to protect Kraków

The basic scope of the program includes the construction of a dispersed flood storage system in the Vistula River watershed upstream of Kraków. This system will consist of controlled lateral polders located in the Vistula Valley and two storage reservoirs on the tributaries of the Little Vistula. The functional purpose of these structures is to capture part of the flood wave's volume, store it temporarily, and release the floodwater in a controlled manner after the flood peak has passed.

Kraków's current flood protection system consists of existing storage reservoirs and linear infrastructure (flood embankments), but it does not yet provide a sufficient level of flood peak reduction under extreme event conditions. The analyses conducted show that simply optimizing the operation of the existing storage reservoirs and relying on passive protection alone are insufficient to achieve the required hydraulic effect of flood peak reduction. Therefore, it is necessary to supplement this system by constructing additional dispersed flood retention capacity in the Vistula Valley and to implement measures designed to reduce rapid runoff from urban and suburban tributaries.

In its current version, the program comprises 8 polders (Czernichów, Rusocice-Kłokoczyn, Kamień-Rusocice, Wiśnicz, Smolice, Jankowice-Rozkochów, Mętków and Gromiec) and 2 dry

flood reservoirs (Gostyń and Mizerów). Due to ongoing multi-criteria analyses, the final number and detailed location of the planned polders and flood reservoirs may still change. These facilities will be designed to operate as a single, mutually cooperating flood storage system—during a flood event, they will capture part of the flood wave's volume, store it temporarily, and subsequently release the floodwater in a controlled manner after the flood peak has passed. The protective effect shall be visible downstream of the respective polders and reservoirs, including in the densely populated Krakow agglomeration.

Figure 1 Location of planned hydrotechnical structures under Task I.1



5.2.1.2 I.2 Flood Risk Reduction from Kraków to Zawichost

Task I.2 includes the preparation and phased implementation of measures aimed at increasing flood storage in the Vistula River valley from Kraków to Zawichost. Its objective is to strengthen flood protection in the areas downstream of Kraków, reduce the transfer of flood risk downstream along the Vistula River, and improve conditions for the safe conveyance of the flood wave.

The basis for further work is provided by the Feasibility Study, the Strategic Environmental Assessment, and the Strategic Social Impact Assessment prepared under Contract 5.7.2 of the previous World Bank-financed Odra–Vistula Flood Management Project (OVFMP).

The Project will include additional hydraulic, technical, economic, environmental, and social analyses and, where necessary, the updating of the studies prepared to date. The analyses will serve to verify possible options for increasing flood storage, assess their rationale, feasibility, and impacts, and identify the optimal set of measures required to achieve the intended flood

protection effect. In selecting the solutions, particular consideration will be given to opportunities to avoid and, where avoidance is not feasible, minimize environmental and social impacts.

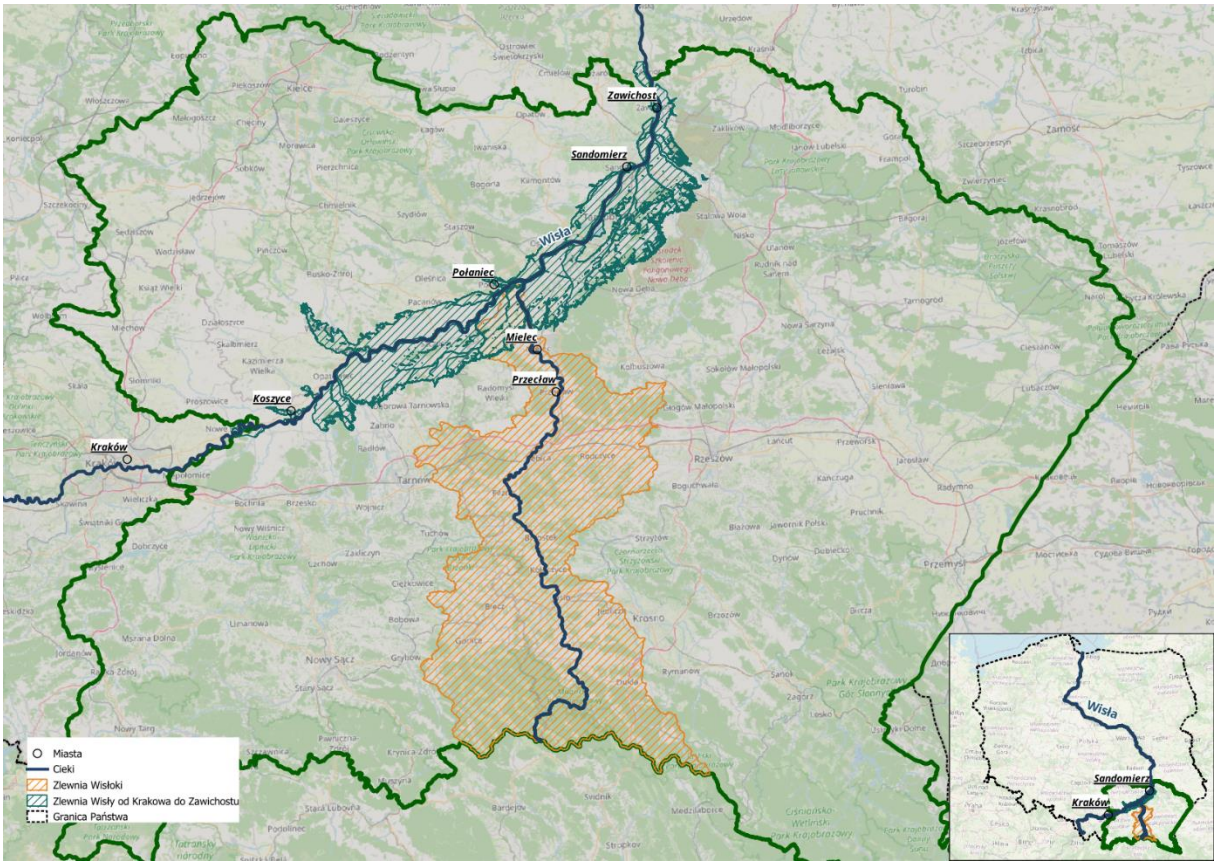
Based on the results of the analyses, investments may be identified for further preparation. Depending on the extent to which they have been assessed and on the results of the evaluations, such work may include the preparation of concepts, design documentation, environmental and social documentation, as well as other preparatory activities. The undertaking of such work will not in itself constitute a decision to implement a given investment. The scope of the investments to be implemented will be determined in phases, taking into account the results of the analyses, the required administrative decisions, the availability of financing, and consultations conducted with stakeholders.

At the current stage, the Project provides for the preparation and construction of the Przykop side polder on the Vistula River. According to the current assumptions, the investment will be implemented through a Design and Build civil works contract. The anticipated scope of social impacts is limited. Based on the current assumptions, the relocation of three residential buildings will be required.

The remaining potential investment measures may be subject to further preparation or implementation only after the completion of the relevant analyses and assessments. At this stage, their final scope, location, and implementation arrangements have not yet been determined.

The activities under Subcomponent 1.2 will be implemented at the locations shown on the map below:

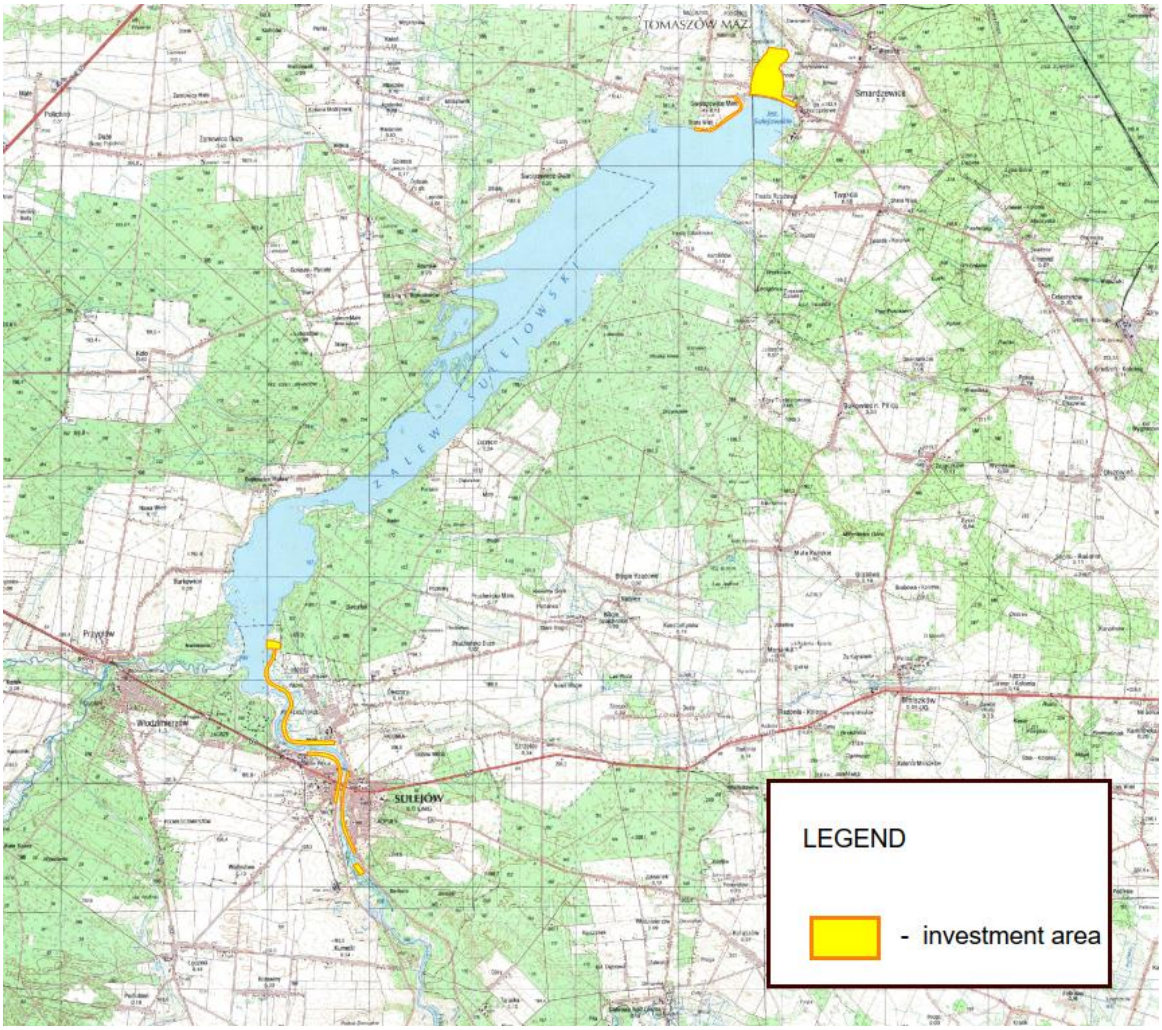
Figure 2 Location of planned hydrotechnical structures under Task I.2



5.2.1.3 I.3 Modernize the Sulejów Water Reservoir

The modernization of the Sulejów Reservoir is an adaptation project of high public importance. Its purpose is not to create new storage capacity but to maintain and strengthen the existing structure's ability to perform its key functions of water storage, flood protection, drought mitigation, flow regulation, environmental protection, and operational management. The Task implemented by RZGW Warszawa will increase the sustainability and reliability of the infrastructure and enable the storage of an additional 84.33 million m^3 of water, the maintenance of a flood storage capacity of approximately 7.030 million m^3, the provision of environmental flow during periods of water scarcity, and more efficient management of the reservoir's operation under conditions of variable hydrology and the increasing effects of climate change.

Figure 3 Schematic map of the Sulejów Reservoir location



5.2.1.4 I.4 Enhance nature-based water retention in the Upper Vistula River Basin

This Task includes proposals for implementing measures designed to retain water and delay its runoff within the Upper Vistula basin, with special attention to the Prądnik River catchment—an area where technical, environmental, and social studies have already been conducted. The essence of this scheme is not to construct new hydraulic structures, but to restore and adapt the

numerous naturally occurring valleys capable of temporarily retaining water. Achieving the ecological continuity of watercourses—by increasing the area of wetlands and green spaces to enhance the capacity to capture rainfall before it turns into dangerous runoff—is the intended outcome of implementing these measures, which will utilize nature-based solutions (NBS).

The scope of this scheme also includes the Skawinka River watershed. For the Skawinka watershed, older conceptual documents, prepared between 2013 and 2014, are available and indicate the need to construct four dry polders and local flood defenses, including embankments, retaining walls, and mobile flood protection systems. As part of this Task, it will be necessary to supplement this program to include non-structural and NBS measures, such as restoring the natural water retention capacity of the valley, slowing runoff, protecting floodplains, locally reducing impervious surfaces in the catchment, re-naturalizing certain sections of watercourses, and prioritizing solutions that reduce the need for hard river channel lining.

5.2.2 Component 2: Enhancing resilience to climate risks in the Upper and Middle Odra River Basin

Component 2 encompasses investments and actions aimed at reducing the risk of drought and improving the water balance in the Nysa Kłodzka River Basin and, more broadly, on a national scale. The projects implemented under this component combine the functions of water retention, flow regulation, flood protection, and the implementation of nature-based solutions. Component 2 addresses the growing threat of water scarcity resulting from climate change, including prolonged periods of low flow and increasingly severe hydrological and agricultural droughts.

5.2.2.1 II.1 Construct the Kamieniec Ząbkowicki Multifunctional Reservoir

The construction of the Kamieniec Ząbkowicki reservoir is a strategic investment aimed at increasing the resilience of the water management system to the effects of climate variability and change. In the context of the growing frequency and intensity of extreme events, including both floods and prolonged low-flow periods, integrated solutions are needed that combine protective, water retention, flow regulation, environmental, and operational functions.

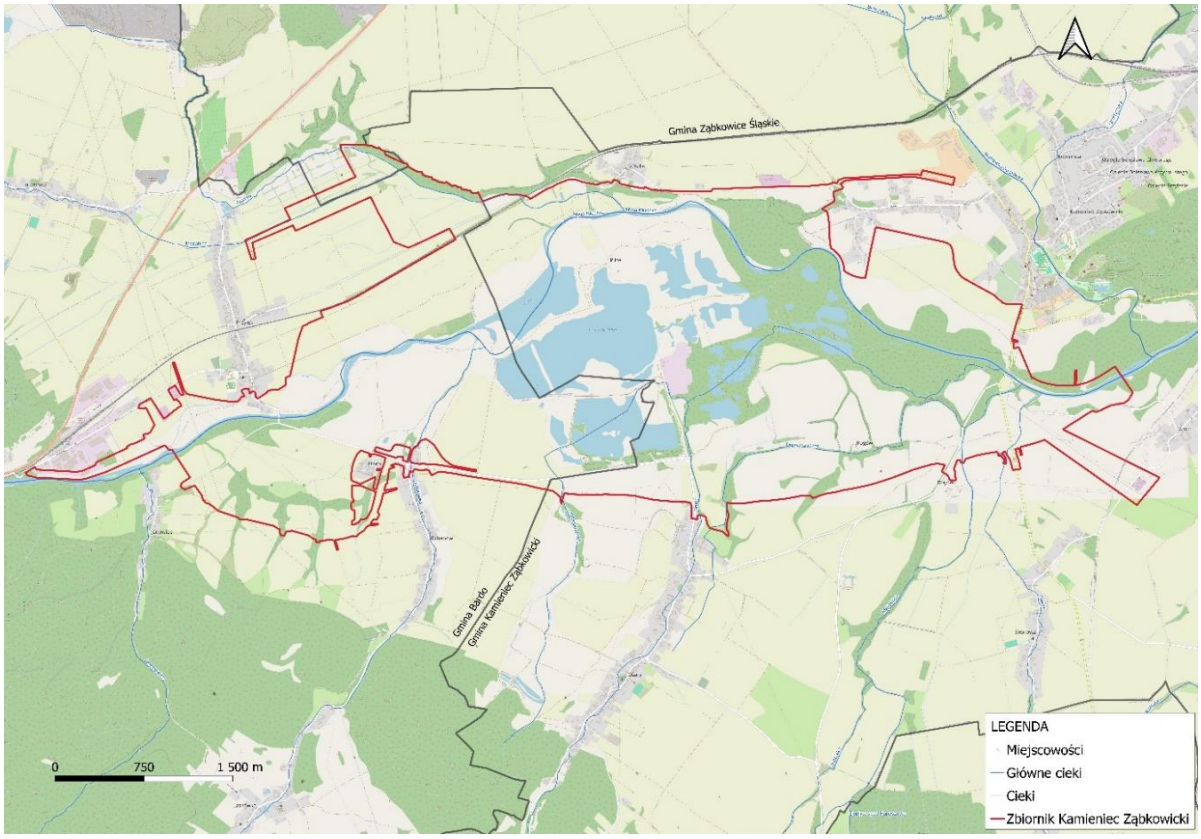
This is an advanced-stage subproject, for which sufficient technical, environmental, and social details are known to support the preparation of site-specific E&S instruments. The Stakeholder Engagement Plan (SEP) and the Grievance Redress Mechanism (GRM) have been prepared; the Environmental and Social Impact Assessment (ESIA), the Environmental and Social Management Plan (ESMP), the Rapid Cumulative Impact Assessment, and the Critical Habitat Assessment are under preparation. The tentative implementation timeline and detailed risk and impact information are provided in these site-specific instruments, which are disclosed separately and updated as the subproject progresses.

The reservoir's storage capacity at the normal water level is 54.0 million m^3, of which the live storage capacity is 23.0 million m^3. The permanent flood storage capacity is 49.0 million m^3, while the additional forced flood storage capacity is 10.0 million m^3. This operating arrangement makes it possible to balance flood protection with the functions of water retention, flow regulation, and power generation, while enhancing the system's ability to respond to variable hydrological conditions. The reservoir's primary function will be to provide flood protection for the areas

located directly downstream of the structure, but also—in conjunction with the other already constructed reservoirs in the cascade (the Topola Reservoir, the Kozielno Reservoir, the Otmuchów Reservoir, and the Nysa Reservoir) —for the areas located further downstream along the lower course of the Nysa Kłodzka River. At the same time, the reservoir will perform important additional functions, including the creation of water reserves, augmentation of low flows, supporting augmentation discharges to the Odra River, electricity generation at a hydropower plant, as well as recreational and tourism-related uses. The concept also indicates the possibility of using the reservoir for fishery purposes and to provide water for municipal and agricultural needs. This range of functions confirms the multi-purpose nature of the project and its importance for the region's long-term water security and development.

The scope of the project includes a complete set of structures and facilities necessary for the safe and efficient operation of the reservoir. In terms of hydraulic engineering, this includes: the construction of the main dam, side embankments, the main outlet works and a spillway, a hydropower plant, a fish pass, the relocation of the Nysa Kłodzka river channel, and the shaping of the reservoir basin. In addition, the design includes: tributary conveyance systems, the relocation of public roads, the construction of service roads, bridge structures, the reservoir's operation and maintenance facilities, a slipway, and a wharf, the construction of a drinking water intake, the relocation of utility infrastructure, as well as environmental and recreational land development. This means that the project is comprehensive in nature and integrates safety, operation, environmental protection, and transportation accessibility objectives.

Figure 4 Schematic location map of the Kamieniec Ząbkowicki reservoir



5.2.2.2 II.2 Flood Risk Reduction in the Biała Lądecka Catchment of the Nysa Kłodzka

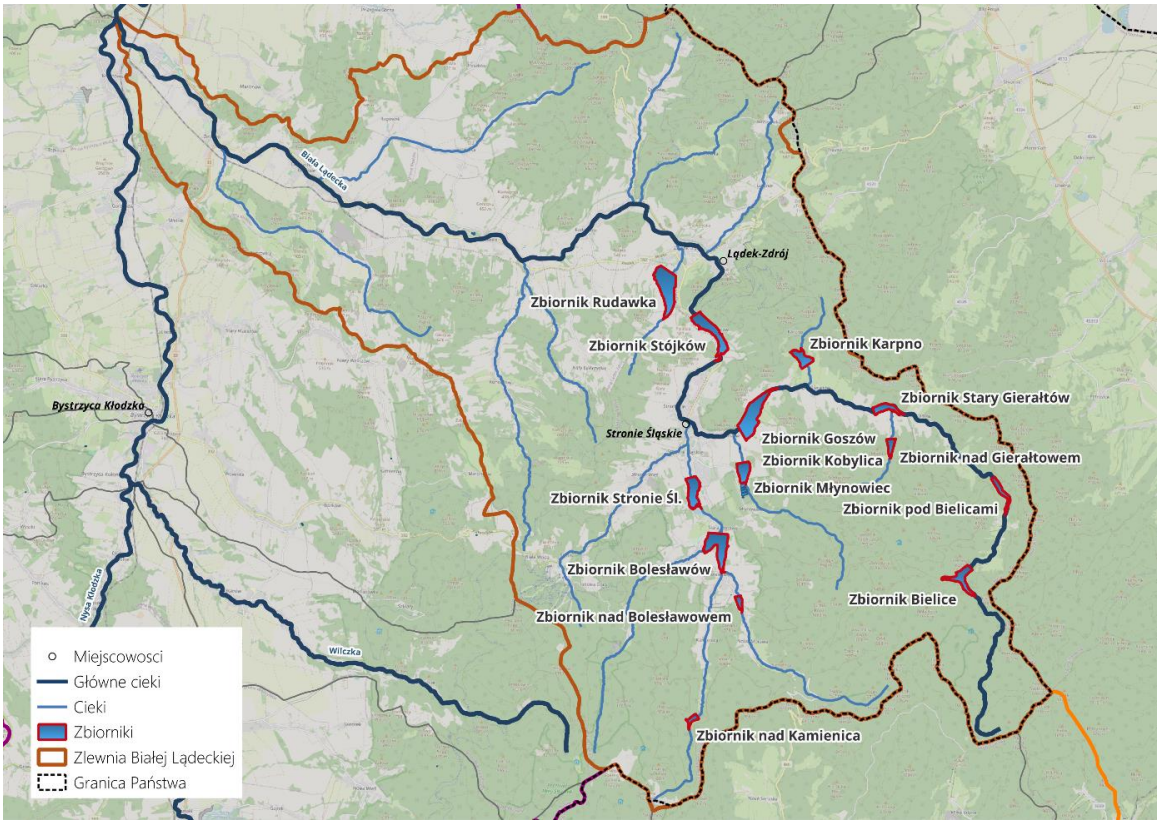
The scope of this Task includes the design and construction of a system of dry polders in the Biała Lądecka catchment as the primary measure for flood risk reduction in Stronie Śląskie and Lądek-Zdrój, as well as for the villages located in the middle and lower reaches of the Biała Lądecka River.

The rationale for constructing the dry polder system stems from the unique characteristics of the Biała Lądecka catchment. It is a mountainous and submontane catchment characterized by a short discharge concentration time, steep terrain gradients, high flow energy, and significant transport of coarse sediment and tree debris during flood events. The main areas at risk are concentrated in the valleys of the watercourses, where urban and rural infrastructure—including roads, bridges, retaining walls, and local revetments—restrict the space available for high water flow. Consequently, the flood risk encompasses not only the risk of flooding but also the risk of erosion, debris dams, and infrastructure damage.

The objective of this Task will be to construct a system of dry polders that functions to transform the flood wave before it enters the most vulnerable sections of the river valley. These structures are designed to temporarily capture part of the flood wave volume, reduce peak flows, lower water levels at the control profiles, and reduce flow energy in urban sections and at locations that limit the river's flood-carrying capacity. The system shall be designed to include the reconstruction of the Stronie Śląskie polder on the Morawka River, an expansion of the hydrometeorological monitoring system, and the implementation of local measures to improve the hydraulic capacity of the river channel and bridge structures.

Four options for the construction of flood storage structures are currently being analyzed. The final selection among them shall be made in a Feasibility Study based on an integrated assessment of the following factors: reduction of flows and water levels in the Stronie Śląskie, Lądek-Zdrój, Radochów, Trzebieszowice, Ołdrzychowice Kłodzkie, and Żelazno profiles; the number of people and buildings removed from the flood risk zone; the scale of necessary land acquisition and resettlement; impacts on areas of high natural value, including Natura 2000 sites; investment and maintenance costs; and the possibility of phased implementation. Both options assume that protection against a flood of a scale similar to the September 2024 flood shall be complemented by non-structural measures, including through spatial planning, flood-proofing of buildings, warning systems, and evacuation procedures, as well as measures designed to increase the water retention capacity of forests.

Figure 5 Location of potential reservoirs



5.2.2.3 *II.3 Enhance nature-based water retention in the Nysa Kłodzka catchment*

This Task involves the planning, preparation, and implementation of activities in the Nysa Kłodzka catchment area (with special attention to the portion covered by the Biała Lądecka catchment) that utilize nature-based solutions (NBS) aimed at increasing the capacity to retain and store rainwater where it falls by delaying the runoff of rainwater and snowmelt into river valleys. For the selected model catchment, an analysis will be conducted, and a set of optimal measures suited to the climatic and geomorphological conditions of the Kłodzko region will be selected; some of these measures will be implemented as part of this Task.

Nature-based solutions (NBS) are solutions that support the population's resilience to the effects of climate change (extreme weather phenomena such as storms, heat waves, cold waves, droughts, floods, fires, etc.), prevent the degradation of valuable ecosystems, and restore those that have already been altered, based on methods inspired by and supported by nature.

In the Nysa Kłodzka catchment area, measures that utilize the landscape's natural ability to store water and mitigate the effects of both rainfall and drought include, among others: the restoration of wetlands and improvement of the water regime in waterlogged areas, the restoration of natural features of rivers and valleys, increased soil and forest water retention capacity, the construction of small water retention structures, and the slowing of water runoff into river valleys in the upper parts of the catchment.

5.2.2.4 II.4 Enhance forest water retention in the upper part of the Nysa Kłodzka catchment

This Task involves the planning, preparation, and implementation of measures to reduce rainwater runoff into river valleys and increase its retention in forested areas of the Nysa Kłodzka catchment (with special attention to its upper part).

As part of the implementation of this Task, it is planned to construct and upgrade hydraulic water-retention structures and structures that slow down water runoff, such as penstock valves, small water reservoirs, water pools, riverbed sills, damming culverts, caisson boxes, and drain trenches (most frequently built from natural materials such as stones, earth, wood, and fascines). As part of these measures, natural ponds and wetlands can also be restored. It may be necessary to grade the forest slopes and roads along the skidding trails after logging operations are completed, which will result in the creation of a series of cascades in the water runoff (using locally available materials—wood, stone, etc.) so that the trails formed in this way, leading down the slopes, are transformed into a series of basins that accumulate water and debris carried by the water, where siltation and leveling will occur over time. In forests growing on slopes, as well as along internal roads and transportation trails, ditch dams, training dams, palisades, logs placed across the direction of water runoff, drainage trenches, cascades, etc., shall be constructed to create a series of depressions in the terrain that will retain part of the flowing water. All these measures will serve to increase the amount of water stored in forests and to prevent overly intense runoff that causes excessive water erosion in mountainous areas by constructing anti-erosion infrastructure along watercourses, skidding trails, and roads.

5.2.3 Component 3: Strengthen institutional capacity to mitigate the impact of floods and droughts

Component 3 encompasses non-structural, institutional, and environmental measures that complement the investments carried out under Components 1 and 2. Its objective is to strengthen the capacity of Poland's water resources management system by modernizing the monitoring and forecasting network, expanding the national registry of land improvement facilities, and improving the flood emergency response system.

5.2.3.1 III.1 Enhance flood risk reduction in the Nysa Kłodzka catchment by non-structural measures

5.2.3.1.1 III.1.1 Strengthen the forecasting and early warning system (FEWS) and alerting in the Nysa Kłodzka catchment

The physical scope of this project includes expanding the hydrological network, developing meteorological and radar observations, upgrading existing stations, and integrating data with the IMGW's systems. Regarding the hydrological component, the plan is to incorporate approximately 14 new gauging stations into the system, to be installed on key tributaries of the Nysa Kłodzka catchment. These stations will be equipped with water level sensors, telemetry systems, and, at locations where hydraulically justified, equipment for flow measurement, such as radar surface velocity sensors or acoustic technologies. Concurrently, a campaign of surveying measurements of the cross-sections of the river channels and valleys is planned, which is necessary to prepare

and update the rating curves Q(h) and to incorporate such measurement data into the hydraulic models.

As for the meteorological component, the project involves the installation of approximately 9 new automatic weather and precipitation stations, as well as several sensors to measure environmental parameters, including soil moisture and snow water equivalent (SWE). A key element of this activity is to enhance the resilience of the monitoring infrastructure. It is planned to upgrade approximately 30 existing monitoring stations—including about 20 hydrological and 10 meteorological stations—by equipping them with autonomous and redundant power supply systems and multi-channel data transmission. This activity also includes an analytical layer supporting the IMGW's existing forecasting systems.

5.2.3.1.2 III.1.2 Pilot program for floodproofing in the Nysa Kłodzka catchment

The main element of this initiative is to develop a concept for a mechanism to provide public funding to property owners and managers of existing buildings who decide to upgrade residential and public buildings using Property Flood Resilience / flood-proofing solutions. This mechanism shall only finance measures designed to reduce flood damage, protect critical infrastructure, and shorten building recovery time. It shall not be treated as a program for general building renovation or thermal insulation upgrades, nor as a guarantee of full protection against water damage. As part of this project, rules governing the operation of such a mechanism shall be developed, including its objective and the technical scope of the supported measures. First and foremost, it is necessary to specifically identify the groups of beneficiaries eligible for such support and to position this mechanism within Poland's system for financing water management-related issues. The support model shall be tailored separately to the following three groups of beneficiaries: (1) private individuals, owners of single-family homes, and small housing associations; (2) owners of public buildings and other facilities belonging to local government units or public entities; and (3) small and medium-sized enterprises (SMEs) and service facilities, taking into account public aid rules, in particular de minimis aid or some other appropriate legal basis.

In addition, a national practical framework for implementing flood-proofing solutions—understood as measures that enhance the resilience of buildings and properties to the effects of flooding—shall be developed under this scheme. The scope of this project activity shall be intentionally limited to the preparation of a catalog of best practices, technical guidelines, and recommendations for amending or clarifying legal regulations. This is not an investment activity involving the installation of flood-proofing measures in specific buildings, but rather an activity aimed at developing a standard that can subsequently be used by government agencies, municipalities, property owners, designers, and contractors. Flood-proofing shall be treated as a complementary element of flood risk management, not as an alternative to catchment-based, retention-enhancing, river regulation, or flood protection measures.

5.2.3.1.3 III.1.3 Flood-resilient urban transformation study for Stronie Śląskie Municipality and III.1.4 Flood-resilient urban transformation study for Lądek – Zdrój Municipality

This project involves the development of a concept for the spatial transformation of the upper part of the Biała Lądecka River valley within the boundaries of the municipalities of Lądek-Zdrój and Stronie Śląskie. This project activity focuses on planning, program development, coordination,

and public participation. It is a tool designed to organize the reconstruction and further development of the Biała Lądecka Valley following the September 2024 flood, taking into account flood risk, planned and completed hydraulic infrastructure projects, residents' needs, environmental constraints, cultural heritage, and land management requirements.

The key objective is to prepare two studies—one for Stronie Śląskie and one for Lądek-Zdrój—while simultaneously formulating consistent and practical implementation guidelines. This approach reduces sector-based management and aligns with the multi-level governance logic of the integrated water resources management the Biała Lądecka Valley is a functional, hydrological, and landscape system that cannot be effectively planned within the boundaries of a single administrative unit. At the same time, implementation tools must be useful for the specific municipalities and for their planning documents, budgets, investment procedures, and relations with residents.

The physical scope of this plan shall include two interrelated components for each municipality: a multi-criteria analysis and a spatial transformation concept. The analytical and diagnostic component shall identify the factors determining a safe and realistic transformation of the valley. In particular, it shall include an analysis of flood zones and hazards, the conditions of the river channels and flood zones, the potential for micro-retention and nature-based measures, environmental considerations in the context of extreme events, flood damage and its spatial distribution, the municipalities' planning status, the transportation system, the distribution of public services, the ownership structure, property management, structural and critical infrastructure, historical conservation requirements, as well as the sociodemographic and economic situation.

Consequently, individual implementation packages shall be prepared for the Municipality of Lądek-Zdrój and the Municipality of Stronie Śląskie. Each package shall contain a land-use concept for the key areas of the municipality, a model for implementing the investments, the proposed operationalization of the activities, guidelines for planning documents, and an estimate of implementation costs. The guidelines shall clearly distinguish between short-term measures—needed during the reconstruction process—medium-term measures associated with the adaptation of documents and investments, and long-term measures designed to bring about a permanent change in the valley's spatial structure.

An important part of this project activity will be public participation. The consultant shall prepare a separate consultation plan that includes the objectives, a stakeholder map, the selection of consultation tools, communication channels, and a method for evaluating the process. Participation shall include various groups: residents of flood-affected areas, business owners, property owners, local leaders, nongovernmental organizations, representatives of public services, institutions responsible for infrastructure, and administrative authorities. Its purpose is not solely to gather opinions, but also to identify conflicts, foster an understanding of spatial constraints, and develop agreements that can be incorporated into formal documents and investment processes.

5.2.3.2 III.2 Strengthen the forecasting, warning, and alerting system in the Łownica and Biała catchments (Little Vistula Basin)

The physical scope of this project includes expanding the hydrological network, developing meteorological and radar observations, upgrading existing stations, and integrating data with the

IMGW's systems. With regard to the hydrological component, the plan is to incorporate approximately 6 new gauging stations into the system, to be installed on key tributaries of the Little Vistula catchment. These stations will be equipped with water level sensors, telemetry systems, and, at locations where hydraulically justified, equipment for determining flow, such as radar surface velocity sensors or acoustic technologies. Concurrently, a campaign of surveying measurements of the cross-sections of the river channels and valleys is planned, which is necessary to prepare and update the rating curves Q(h) and to incorporate such measurement data into the hydraulic models.

As for the meteorological component, the project calls for the installation of approximately 2 new automatic weather and precipitation stations, as well as several environmental sensors, including those for soil moisture and snow water equivalent (SWE). An important aspect of this activity is to enhance the resilience of the monitoring infrastructure. It is planned to upgrade approximately 23 existing monitoring stations—including about 11 hydrological and 12 meteorological stations—by equipping them with autonomous and redundant power supply systems and multi-channel data transmission capabilities. This activity also includes an analytical layer supporting the IMGW's existing forecasting systems. It does not involve the construction of a separate IT platform but rather the development of tools that integrate hydrological, meteorological, and radar data and support the identification of anomalies and potential failures in the monitoring system.

5.2.3.3 III.3 Integrate water quantity and water quality monitoring

The plan envisages the creation of an integrated system that will combine IMGW-PIB's existing hydrological monitoring network with automatic monitoring of surface water quality in rivers and lakes. This system is not intended to replace the statutory monitoring conducted for the purposes of water status classification under the Water Framework Directive, but rather to serve as a significant protective and operational complement to it. Its purpose will be to continuously track changes occurring in the aquatic environment, rapidly identify threats to humans and ecosystems, and produce short-term forecasts with a horizon of at least 72 hours. Such an integrated approach will enable the simultaneous analysis of flow rate indicators, water levels, and other quantitative parameters, as well as basic water quality parameters, thereby allowing for a better interpretation of the causes of changes and more effective forecasting of their effects.

An important component of this investment will be the development of institutional, operational, and analytical capabilities. A Water Quality Monitoring Center is to be established within the IMGW-PIB structure, responsible for the development, maintenance, and operation of the system, while the Central Laboratory for Measuring Instruments will be additionally equipped with sensor calibration stations. The project also provides for the development of a data quality assurance and control module, laboratories supporting sample analysis, as well as a hydrodynamic and eco-hydrodynamic modeling module. This will allow not only for the verification of the accuracy of data from the automated system but also for forecasting the transport and distribution of pollutants. Of particular importance is the possibility of further developing the salinity models—an initiative launched following the ecological disaster in the Odra River in 2022—and feeding them with current measurement data. Furthermore, the system will transmit results to the Chief Inspectorate for Environmental Protection (GIOŚ), and Polish Waters and the Ministry of Infrastructure will also be able to utilize this data.

5.2.3.4 *III.4 Modernization and Development of RZGW Operational Centers in the Vistula and Odra Basins*

This Task will constitute the second stage of creating a national system to support decision-making in water management using modern IT tools. This initiative involves the further development of the Operational Centers, addressing critical gaps, and expanding the Centers' coverage to the lower reaches of both basins. The existing core—which includes the Data Acquisition, Archiving, and Sharing Subsystem (DAASS), the Modeling Subsystem, the internal and external portals, user roles, redundancy capabilities, and data source integration—remains the system' foundation. The new phase shall transform it into a modern decision support system (DSS), operating according to the logic: "observe – predict – compare options – evaluate effects – recommend," using machine learning and AI.

The scope of this Task shall include not only further strengthening the existing Operational Centers for the Upper Vistula and the Upper and Middle Odra—namely, the centers in Kraków and Wrocław, along with supplementary centers in Rzeszów and Gliwice—but also the establishment of two additional centers for areas not yet included in the implementation and the installation of necessary equipment in them. Such a system will enable a transition from a regional operating system to a coherent network of centers covering the key stretches of the Vistula and Odra Rivers, including their most important tributaries, as well as reservoirs, polders, weirs, barrages, and associated structures. This will also require upgrading the existing backup centers and establishing new ones to support the newly established Operational Centers.

The first subtask will be to standardize and develop the DAASS as a common data environment for all the Centers. This will involve standardizing the method for data collection and transmission from local SCADA (Supervisory Control and Data Acquisition) systems, PLCs (Programmable Logic Controllers), and data loggers to the DAASS; consolidating data into a single communication standard; implementing local data buffering at hydraulic facilities; ensuring transmission redundancy; and expanding the scope of acquired variables to include information regarding the actual operation of the hydraulic infrastructure. The second subtask will be to develop the technical and telecommunications infrastructure. It is necessary to increase the reliability of data transmission from the hydraulic structures to the Centers through fiber-optic cables, radio links, DMR (Digital Mobile Radio)/MCX (Mission Critical Communications), secure SD-WAN/VPN mechanisms, redundant links, and local data buffering. This applies to both the existing Centers and the new ones. The third subtask will involve establishing a uniform reporting database and crisis communication system.

5.2.3.5 *III.5 Establishment and Population of the Water Management Information System for Drainage Infrastructure*

This initiative involves a comprehensive inventory of land drainage facilities and drained areas, the preparation of data for upload into the GeoMelio national registry, and subsequently their controlled import, including validation, error reporting, and the maintenance of a complete audit trail. This project is a continuation of earlier efforts aimed at standardizing land drainage records for 15 Catchment Management Boards and aims to expand national coverage by including an additional 35 Catchment Management Boards for which the data is incomplete, inconsistent, or does not reflect the actual condition of the infrastructure on the ground.

This activity shall be treated as a project combining field, registry, and IT-related components. The field component of this activity includes a comprehensive inventory of land drainage facilities and the areas where these facilities operate. Data will be acquired according to a uniform methodology, using GNSS RTK measurements with sub-decimeter accuracy, aerial photogrammetric surveys, orthophoto maps with a resolution of at least 5 cm, point clouds with a density sufficient for 3D analysis, and photographic documentation. The scope of the inventory includes linear, point, and surface features, such as ditches, pipelines, culverts, outlets, damming structures, and associated technical infrastructure. The second key component of this activity is the implementation of a controlled process for importing data acquired by field contractors directly into GeoMelio. This process will include data transfer standards, a catalog of required formats, attribute schemas, controlled vocabularies, a system of identifiers, the required coordinate reference system, and a complete structure for a contractor's data package. Standardization is essential for reducing errors and preventing a situation in which different field teams deliver data that is incompatible or requires costly manual processing. The IT component is essential for the feasibility of the entire Project. The scale of the planned inventory—covering a substantial area of the country and many categories of spatial data—will result in at least a threefold increase in data volume compared to the data currently stored in the database. This increase will result not only from the number of land drainage objects but also from the nature of the outputs: high-resolution ortho-photomaps, point clouds, cross-sections, profiles, reports, field photos, intermediate data, validation registers, and import history. Without expanding the GIS platform and database layer, the risk would include a loss of efficiency, prolonged imports, a reduced ability to publish mapping services, and decreased reliability of the national register.

5.2.3.6 III.6 Prepare Master Plans for key stretches of the Vistula and Odra River Basins, integrating flood protection, drought mitigation, and economic objectives

Master plans for the key sections of the Vistula and Oder river basins will integrate objectives related to flood protection, drought impact reduction, and economic functions. These are strategic planning documents at the river basin level. They set the framework for the future identification and phasing of investments, but they do not in themselves approve specific projects. Their detailed scope and the scope of tasks will be defined at the Project implementation stage, based on the existing river basin management plans and flood risk management plans prepared by PGW WP under the Water Law.

Because the Master Plans set the framework for future consent for projects that may have a significant impact on the environment, they are subject to a mandatory Strategic Environmental Assessment (SEA). In accordance with World Bank requirements, a Strategic Social Assessment (SSA) will be prepared as part of the SEA.

Each SEA/SSA for the Master Plans will cover cumulative basin-scale risks, including biodiversity and the connectivity of Natura 2000 areas, hydro morphological alterations, social impacts (including resettlement), vulnerable groups, and cultural heritage. These assessments will include stakeholder engagement in line with the Project Stakeholder Engagement Framework and will apply the project's environmental and social screening criteria.

5.2.3.7 III.7 Establish the Hydroclimate Monitoring Center at IMGW-PIB

As part of a project planned for implementation with the co-financing of international financial institutions, including the World Bank, in the area of water management focused on reducing flood and drought risk, titled "Climate Resilience in Water Management Project", under the component "Strengthening Institutional Capacity in Reducing Flood and Drought Risk", it is proposed to develop a Hydroclimatic Risk Monitoring System (HRMS) within the structure of IMGW-PIB (Institute of Meteorology and Water Management – National Research Institute).

Hydroclimatic risk monitoring is the process of collecting, analyzing, and interpreting data on extreme water and climate-related phenomena, such as droughts, floods, heat waves, storms, and heavy rainfall. Its purpose is to detect hazards, identify synergistic effects of threats, assess their impact on socio-ecological systems, and support decision-makers in taking adaptive and preventive actions. The HRMS will utilize advanced technologies such as artificial intelligence (AI), the Internet of Things (IoT), GIS systems, and risk analysis tools to provide up-to-date information on extreme weather events and their consequences.

The HRMS shall have a modular structure that allows for continuous improvement and development of model layers: Data Exploration Module, Simulation Component for Modeling and Forecasting Extreme Events, Aggregator for Socio-economic and Environmental Impact Assessment Models, and Information Systems Component.

5.2.3.8 III.8 Develop Crisis Management Centers

This initiative is systemic and non-structural and aims to enhance the efficiency of responding to flood hazards at the municipal (*gmina*), county (*powiat*), and regional (*województwo*) levels. The project shall complement infrastructure and hydraulic measures by strengthening the final link in the safety chain: translating information about a flood hazard into an operational decision, coordinating crisis management services, warning the public, managing resource logistics, and carrying out actual actions on the ground. In this sense, this initiative will create an organizational and information layer that will enable the administration and crisis management services to make efficient use of hydrological data, hazard- al maps, warning messages, and field information.

The first element of this activity will be a comprehensive analysis of the current crisis management system in flood situations. It shall include a review of the crisis management plans applicable in the respective municipalities, counties, and voivodeships; an assessment of their current relevance, completeness, and compliance with higher-level documents; as well as an identification of legal, jurisdictional, and technical barriers. The analysis shall be conducted not only from a formal perspective but also from an operational one, and the following shall be examined: decision-making pathways, points of contact, the operation of crisis management centers, the flow of information between the administration, the services, and Polish Waters, as well as the ability to rapidly launch field operations.

The second pillar will focus on the optimization of early warning and communication systems. The Task shall assess the efficiency of the currently used channels, including text messages, alarm sirens, regional warning systems, alerts sent by the Government Center for Security (RCB), mobile applications, and local communication channels. The assessment shall include message latency, territorial coverage, readability, content consistency, and the level of public

understanding and trust. Special emphasis shall be placed on the ability to warn people directly in risk zones and on tailoring messages to different groups of recipients, including the elderly, people with limited mobility, and the rural population.

The third pillar of the Task will be an inventory and optimization of logistical resources. It will cover rescue equipment, pumps, sandbags, boats, drones, radio communication stations, warehouses, evacuation points, manpower concentration points, key roads and bridges, as well as the capabilities of the State Fire Service, the Volunteer Fire Service, the Territorial Defense Force, the local administration, volunteers, and nongovernmental organizations. The output shall be logistical maps showing the deployment of resources, access times, accessibility restrictions, and recommendations regarding regional equipment reserves.

5.2.4 Component 4: Project Management, Monitoring, and Evaluation

Component 4 covers activities supporting the implementation of the Project, including institutional coordination, reporting, and the exchange of knowledge and experience.

5.3 Purpose and scope of the Project level Stakeholder Engagement Plan (Framework)-SEF

This SEF sets out the principles and procedures for stakeholder engagement throughout the Project lifecycle. It establishes the framework within which the PIUs develop SEPs for each Task under the Project. The SEF is proportionate to the Project's scale and risks, particularly those associated with potential large-scale physical and economic displacement and stakeholders affected by environmental consequences.

The objectives of this SEF are to:

- ensure meaningful engagement of all stakeholders, specifically PAPs, at every stage during Project preparation and implementation,
- identify potential risks and social tensions, at an early stage through systematic monitoring of stakeholder concerns and proactive communication,
- establish a framework for the functioning of the GRM that is accessible, confidential, and transparent for all stakeholder groups,
- ensure the special protection of the rights of particularly vulnerable groups by tailoring engagement methods to their specific needs.

This SEF applies to all Tasks implemented under the Project. It covers the entire lifecycle of each Task, from the early design stage through works execution to closure. The SEF establishes the principles of stakeholder engagement and outlines how the Investor will inform stakeholders as additional Project information becomes available.

This SEF does not replace the SEP. The PIU shall develop a site specific SEP for each Task in accordance with the principles set out in this SEF and the guidelines provided in Annex 11.2 which shall be reviewed and approved by the PCU, and submitted to the World Bank for review. This requirement applies not only to structural measures, but also to institutional and non-structural

activities, such as the Hydroclimate Monitoring Centre, Crisis Management Centres, and forecasting and early warning systems. These activities will be addressed through the SEP as well. For Tasks involving reservoirs or dam structures, the SEP shall also cover affected communities and assets located within the downstream inundation corridor, including those potentially exposed to dam failure, overtopping, uncontrolled water release, spillway or gate malfunction, and other emergency scenarios defined in the relevant Emergency Preparedness Plans (EPPs).

The SEF is a living document. The PGW WP updates the SEF in the event of significant a material change to environmental or social risks or impacts within the approved Project scope that requires a change to the risk management approach, including the approach to stakeholder engagement, or the emergence of new environmental and social risks not addressed in this document. The Investor discloses the updated SEF to the public and informs the World Bank of any changes. Significant changes require World Bank approval before implementation.

5.4 Entities involved in the SEF implementation

Overall strategic coordination, guidance, and quality control will be provided by an Inter-Ministerial Project Steering Committee (PSC) co-chaired by the Ministry of Interior Affairs and Administration (MoIA) and the Ministry of Infrastructure. The PSC will also include representatives of the Ministry of Finance, the Ministry of Regional Policy and European Funds, the Implementing Agency for European Funds, and the President of Polish Waters. The Director of the PCU will participate in meetings of the PSC in an advisory role.

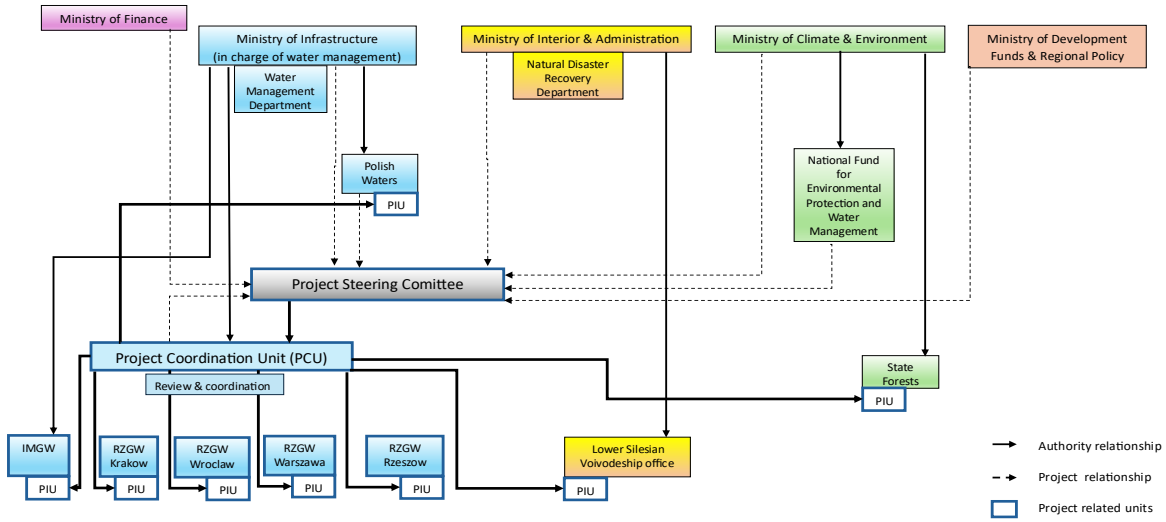
At the operational, day-to-day level, coordination and quality control will be the responsibility of the Project Coordination Unit (PCU). The PCU will coordinate between financial institutions, ministries, and implementing agencies. The PCU will be established as an independent budgetary unit subordinated to the Ministry of Infrastructure. It will be responsible for preparation of disbursement documentation, reporting, financial planning and monitoring, and monitoring of the flow of funds. The PCU will also be responsible for monitoring and evaluation of project implementation and results.

Four PIUs (Kraków, Wrocław, Rzeszów, and Warsaw) will be established within the respective Regional Water Management Authorities (RZGWs) to support project investments in the respective regions under Components 1 and 2. PIUs will be established in three national agencies to support activities in Component 3: one PIU within Lower Silesian Voivodship Office to manage the development Crisis Management Centers, one PIU in IMGW, and one PIU in State Forests. These three agency PIUs, together with the PCU, will support implementation of the institutional strengthening tasks under Component 3.

PIUs will also be supported by Technical Assistance Consultant (TA). Each PIU will be responsible for implementation of assigned project subcomponents and activities, including procurement, contract supervision and monitoring, application of effective internal controls and procedures, accounting for expenditures in the respective budgetary accounting systems, receipt of funds, payments, preparation of documentation and information related to use of loan proceeds, provision of statements of expenditures and supporting documentation for eligible expenditures, and delivery of project reporting and monitoring.

The Project implementation structure is shown below:

Figure 6 The Project implementation structure



The PCU coordinates stakeholder engagement at the project level. It ensures that each PIU's task-level SEP aligns with this SEF, ESS10, and World Bank requirements, and coordinates stakeholder engagement activities across all PIUs.

The PIU is responsible for preparing detailed Task -specific SEP and for its implementation, including securing funding for information and consultation activities and overseeing the public consultation process and the operation of the GRM. The PIU is supported by a TA Consultant, who is directly responsible for preparing the SEP document, conducting stakeholder identification and analysis, organizing and documenting public consultations, and preparing information materials. During implementation, the TA Consultant supports the PIU in maintaining ongoing dialogue with stakeholders and implementing the SEP, including making the GRM operational.

Each Task-specific SEP shall be prepared in accordance with the principles and requirements set out in this SEF. A preliminary Task-specific SEP shall be prepared and implemented as soon as the Task location, preliminary scope, or alternative options become sufficiently defined to permit stakeholder identification and meaningful engagement, and before decisions on siting, design alternatives, or impact avoidance are finalized. The SEP shall be updated during the feasibility assessment, design development, preparation of the ESIA and LARAP, prior to procurement, prior to commencement of works, and whenever material changes arise. The SEP shall be prepared by the TA Consultant, approved by the PIU, and submitted to the World Bank through the PCU together with the relevant procurement documentation.

The Works Contractor is responsible for keeping residents and stakeholders informed on an ongoing basis in accordance with the information disclosure and stakeholder engagement requirements set out in the SEP and the ESMP, and with the obligations transferred to the Contractor through the contractual requirements. This will include inter alia, works schedule and construction-related impacts environmental and social impacts, and for the timely referral of

complaints and requests to the PIU in accordance with GRM procedures. The contractor will designate specific person(s) to collaborate with the PIU on field-area issues at the work sites through appointment of experienced ES staff including grievance and community liaison officers. The level and scope of reporting requirement will be part of the contractual obligations and as per ESMF and ESMPs respectively and ultimately set forth in the Contract for Construction works.

5.5 Linkages between the SEF and other Project environmental and social documents

The Project is being prepared in accordance with the World Bank's Environmental and Social Framework (ESF), which requires a package of documents at two levels: the framework level – prior to Project approval by the Bank for management of risks and impacts that cannot be determined until the subproject details have been identified – and the operational level – for each Task individually where designs are well advanced allowing detailed identification and assessment the potential environmental and social risks and impacts of each of the proposed subprojects

Table 2 Linkages between environmental and social instruments and the RZI

Document	Level	Relationship with the SEF
Environmental and Social Management Framework (ESMF)	Framework	The ESMF and the SEF are complementary documents. The ESMF sets out the framework for managing environmental and social risks. The SEF sets out the framework for engaging stakeholders in this process.
Land Acquisition and Resettlement Action Framework (LARAF)	Framework	The LARAF governs the principles of land acquisition and resettlement at the framework level. It imposes on the PIU an obligation to engage PAPs in accordance with the SEP. Information activities carried out under the LARAF must be consistent with the SEF and the SEP for the given Task.
Labor Management Procedures (LMP)	Framework	These procedures set out the way in which project workers will be managed, in accordance with the requirements of national law and ESS2 covering gaps between these two. The procedures will address the way in which ESS2 will apply to different categories of project workers , and the way in which third parties will be required to manage their worker The LMP establishes a separate grievance mechanism for Project workers, operating independently of the GRM described in the SEF. The GRM under the SEF is intended exclusively for external stakeholders and PAPs. Both the LMP and the SEF define dedicated, safe, and confidential channels for reporting SEA/SH incidents. These channels ensure proper referral to medical or legal services while protecting survivors anonymity.
Environmental and Social Impact Assessment (ESIA)	Operational (Task level)	This SEF sets out the framework for preparing the SEP. The relationship between the ESIA and the SEP works in both directions: consultations conducted under the SEP provide input data for the ESIA, while the findings of the ESIA update the stakeholder analysis in the SEP for the given Task.
Emergency Preparedness Plan (EPP)	Operational (Task level)	The EPP addresses dam safety risks, including potential failure, overtopping, uncontrolled releases, and spillway malfunction, and applies to communities and assets within the downstream inundation area. The SEF and dedicated SEP define the disclosure of hydraulic data for EPP purposes, as well as consultations with downstream communities to validate assumptions and gather locally relevant information. The EPP shall be prepared and updated in close coordination with the SEP for the relevant Task.

Document	Level	Relationship with the SEF
Environmental and Social Management Plan (ESMP)	Operational (Task level)	. Environmental and social management plan (ESMP) is an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures The SEP sets out how engagement is carried out in practice during development and implementation of the ESMP. The SEF sets out the framework for preparing the SEP.
Stakeholder Engagement Plan (SEP)	Operational (Task level)	Each site specific SEP is developed on the basis of this SEF. It elaborates the principles and standards of the SEF for the specific location and affected and interested stakeholders, PAP group, local communities, environmental authorities, NGOs and relevant stakeholders.
Land Acquisition and Resettlement Action Plan (LARAP)	Operational (Task level)	The schedule of stakeholder engagement activities described in the SEP is coordinated with the LARAP implementation schedule and information disclosure, consultations and engagement required by the LARAF and LARAPs respectively.
Contractor's Environmental and Social Management Plan (C-ESMP)	Operational (contract level)	The C-ESMP implements the ESMP requirements at the level of the construction contract. The Contractor carries out stakeholder engagement activities in accordance with the SEF and SEP, to the extent required by the Engineer.

This SEF is the overarching document governing all operational SEPs developed or to be developed under the Project. Where further elaboration of the principles is required at the operational level, a Task-specific SEP may introduce more detailed and intensified measures in adaptations to local environmental and social conditions, provided they remain consistent with the requirements of the World Bank's ESS10 and this SEF.

6 Legal basis and standards

6.1 Principles of stakeholder engagement

Stakeholder engagement is an ongoing process. The PIU begins engagement at the earliest possible stage of project preparation and continues it throughout the project lifecycle.

The PIU conducts meaningful consultation. Meaningful consultation is a two-way process that:

- begins at an early stage of planning and serves to gather stakeholders' initial views and incorporate them into the design of the investment;
- encourages stakeholders to express their views – in particular as input to the identification and mitigation of environmental and social risks;
- is conducted on an ongoing basis, as new risks and impacts emerge;
- is based on the prior disclosure of relevant, transparent, objective, and easily accessible information – in a timeframe, language, and format that allow for meaningful consultation and are understandable to stakeholders;
- takes stakeholders' views into account and responds to them;
- supports the active and inclusive engagement of PAPs;

- is free from external manipulation, interference, coercion, discrimination, and intimidation;
- is documented and disclosed by the PIU.

The PIU adapts the scope, nature, and frequency of engagement to the scale of the Project and its risks. The PIU takes into account the differing communication and accessibility needs of individual stakeholder groups – in particular the vulnerable groups identified in Chapter **Błąd! Nie można odnaleźć źródła odwołania.**.

When designing the consultation program, the PIU takes safety and accessibility into account, particularly in situations of high social tension.

The Project involves large-scale physical and economic displacement. Projects of this kind are particularly prone to the escalation of social conflict. The PIU therefore actively selects engagement methods that minimize this risk and, in situations of high social tension, may replace open public meetings with other forms of consultation – in particular written consultation, small-group meetings, or online meetings. The choice of engagement methods is informed by a prior assessment of the relevant stakeholder groups, including their perspectives, concerns, and objections, to support the preparation of site-specific SEPs and to tailor the content and approach of engagement accordingly. Given the scale of displacement involved, achieving consensus among all stakeholders may not be feasible; the priority is instead to ensure that the views of affected people are meaningfully captured and reflected in the engagement process. Engagement strategies are therefore tailored and applied on a case-by-case basis, taking into account the positions, interests, and concerns of the different stakeholder groups involved. The choice of consultation format must be justified in the SEP. The PIU verifies the adequacy of the methods used during the implementation of each Task and adapts them to the prevailing social situation.

6.2 World Bank requirements

ESS10 is applied in conjunction with ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), ESS2 (Labor and Working Conditions), ESS3 (Resource Efficiency and Pollution Prevention and Management, ESS4 (Community Health and Safety), ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement),) , ESS6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources), and ESS8 (Cultural Heritage)are also highly relevant to the stakeholder engagement process. The principles for engaging workers and the workers grievance mechanism are described in detail in a separate document, the Labor Management Procedures (LMP) and are separate from the community grievance mechanism.

ESS10 requires the PIU to:

- Engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design
- Establish and maintain constructive relationships with stakeholders – in particular with parties affected by the Project.

- Assess the level of stakeholder interest and support, and take stakeholders' views into account in the design and implementation of environmental and social activities.
- Ensure the effective and inclusive participation of PAPs throughout the Project lifecycle on issues that could affect them, including the mitigation measures adopted, taking into account their perspectives.
- Provide stakeholders with information on environmental and social risks and impacts in a timely, accessible, and understandable manner.
- Provide PAPs with accessible means for raising issues and grievances, and respond to and resolve grievances in a timely manner.
- Identify and analyze stakeholders at an early stage of Project preparation;
- Disclose Project information in a timely, accessible, and understandable manner;
- Conduct meaningful consultation based on prior disclosure of information and in a manner that is inclusive and free from manipulation and coercion;
- Identify barriers to the participation of particularly vulnerable groups and implement dedicated measures to ensure their equal access to information and consultation opportunities;
- Continue stakeholder engagement throughout Project implementation and, in the event of significant changes to the Project scope, inform and consult with PAPs;
- Establish and maintain a GRM accessible to all stakeholders, including a dedicated safe and confidential channel for reporting SEA/SH cases using a survivor-centered approach;
- ensure the institutional capacity necessary to implement the SEF;
- maintain records of public consultations and provide stakeholders with feedback.

Monitor and evaluate the stakeholder engagement and grievance management process and adopt adaptive management.

6.3 Polish law and EU regulations

Under Polish law public participation in decision-making processes for flood protection investments are extensively covered. The key legal acts relevant to stakeholder engagement are as follows:

1. Act of October 3, 2008, on Access to Information on the Environment and Its Protection, Public Participation in Environmental Protection, and Environmental Impact Assessments (EIA Act).

   The EIA Act governs access to environmental information and public participation in the EIA procedure. The PIU submits information on the project and its impacts to the RDOŚ, which is required to make this information publicly available. The public may then submit comments and requests, all of which the RDOŚ is required to address.

2. Act of June 14, 1960 – Code of Administrative Procedure (KPA).

The KPA guarantees parties the right to take an active part in administrative proceedings at every stage. Parties are notified individually of actions taken by the authorities and have access to the case file. The KPA also sets out a procedure for handling complaints and requests concerning the conduct of administrative authorities.

3. Act of July 8, 2010, on Special Rules for the Preparation and Implementation of Projects Concerning Flood Control Structures (Special Act on Flood Protection).

   The Special Act on Flood Protection governs the IPIP procedure, under which public participation is subject to the KPA. It also allows for an administrative hearing to be open to the parties.

4. Act of June 26, 1974 – Labor Code.

   The Labor Code governs the mechanism through which Project workers, as a category of stakeholders, may raise concerns relating to mobbing, sexual harassment, discrimination, and occupational health and safety. Complaints in these areas are addressed to the National Labor Inspectorate, an external state authority independent of the employer.

5. Act of June 14, 2024, on the Protection of Whistleblowers

   The Act on the Protection of Whistleblowers establishes a separate channel through which Project workers may report violations of law falling within the Act's defined material scope (e.g., public procurement, financial services, environmental protection, public health), with protection against retaliation. As labor law matters were excluded from the Act's scope, this channel does not cover worker concerns of the type addressed under the Labor Code, described above.

6. The Aarhus Convention.

   Poland is a party to the Aarhus Convention, which guarantees the right to information, the right to participate in environmental decision-making, and the right of access to justice in environmental matters.

7. Regulation (EU) 2016/679 (GDPR).

   The GDPR governs the protection of personal data belonging to consultation participants and complainants. The PIU processes stakeholders' personal data in accordance with the GDPR.

Polish law is highly consistent with ESS10 requirements as regards formal information disclosure and the conduct of consultations within administrative procedures (EIA, IPIP). World Bank standards, however, impose additional obligations concerning the proactive identification of stakeholders and the continuity of their engagement beyond the rigid framework of legal proceedings. The key gaps between Polish law and ESS10 requirements on stakeholder engagement and information disclosure, and the measures adopted in this SEF to address them, are summarized in the gap analysis matrix below. In particular, gaps have been identified with regard to the proactive identification of all stakeholders (including vulnerable groups), the absence of a requirement to prepare a Stakeholder Engagement Plan, and the absence of a requirement to ensure meaningful consultation of women and other vulnerable or disadvantaged groups — each addressed through the corresponding requirements of this SEF and the site-specific SEPs

ESS 10 Requirement	Relevant Provisions of Polish Law	Compliance Status	Comment	Corrective measures	Implementing document
Identification of all stakeholders, including vulnerable groups	Art. 5, Art. 7 of the Special Act on Flood Protection in conjunction with Art. 28 of the Code of Administrative Procedure (right to participate in proceedings), Art. 33 of the Environmental Impact Assessment Act (public disclosure of information regarding EIA proceedings)	Partial compliance	No explicit requirement to identify all stakeholders, particularly vulnerable groups. The law guarantees a general right to participate for persons subject to expropriation, but does not include mechanisms for actively identifying stakeholders other than owners, lessees, tenants, and perpetual usufructuaries of real property.	Conduct comprehensive stakeholder mapping and identification, explicitly including vulnerable and disadvantaged groups (e.g. elderly, low-income households, persons with disabilities, women-headed households, informal land users) beyond the formally recognized parties to administrative proceedings, and ensure their access to information and participation channels throughout project implementation.	Stakeholder Engagement Plan (SEP)
Preparation and Implementation of the Stakeholder Engagement Plan (SEP)	Lack of regulations	Non-compliance	There is no requirement to prepare or implement a Stakeholder Engagement Plan (SEP).	Prepare and implement a Stakeholder Engagement Plan (SEP) in accordance with ESS10, defining stakeholder identification methodology, engagement methods and schedule tailored to different stakeholder groups (including vulnerable groups), disclosure procedures, and a project-level grievance mechanism.	SEP
Timely and accessible disclosure of information	Art. 4, Art. 8–9, Art. 12–15, Art. 33, Art. 33a of the Environmental Impact Assessment Act Article 7 of the Special Act on Flood Protection;	Compliance	The regulations govern access to environmental information and the disclosure of information in a timely and accessible manner; they specify the deadlines and methods for making environmental information and information regarding proceedings for the issuance of a IPIP decision available. The obligation to disclose information applies to both the parties to the proceedings and the general public.	N/A	N/A
Conducting consultations in a meaningful and inclusive manner	Articles 33–37, Article 79 of the Environmental Impact Assessment Act (UOOŚ); Articles 5 and 7 of the Special Act on Flood Protection in conjunction with Article 28 of the Code of Administrative Procedure (KPA); (right to participate in proceedings),	Compliance	The provisions ensure the public's ability to participate, submit comments, and make requests, and define consultation procedures.	N/A	N/A

ESS 10 Requirement	Relevant Provisions of Polish Law	Compliance Status	Comment	Corrective measures	Implementing document
Special attention to women's perspectives and other vulnerable or disadvantaged groups in ensuring meaningful consultation	Article 33 of the Constitution of the Republic of Poland Act of December 3, 2010, on the Implementation of Certain European Union Provisions Regarding Equal Treatment (consolidated text: Journal of Laws 2025, item 1452)	Partial compliance	Equality of rights for women and men in family, political, social, and economic life. Prohibition of discrimination on the grounds of sex, race, ethnic origin, nationality, religion, denomination, worldview, disability, age, or sexual orientation. No explicit provisions requiring that consultation processes be designed or conducted in a manner that ensures meaningful participation by women or other vulnerable or disadvantaged groups (e.g., persons with disabilities, the elderly, low-income households, or other groups facing barriers to participation)—the equal treatment framework prohibits discrimination but does not impose an affirmative obligation to tailor consultation methods to reach or meaningfully engage such groups.	Design and implement differentiated consultation methods to ensure meaningful participation of women and other vulnerable or disadvantaged groups — e.g. consultation sessions scheduled to accommodate women's typical care and household responsibilities (e.g. avoiding hours that conflict with school pick-up times), venues that are physically accessible and located within local communities, engagement through existing local structures, accessible formats and venues for persons with disabilities and the elderly (including door-to-door or home-visit options where mobility is limited), and targeted outreach to low-income households and farmers whose livelihoods depend on affected land. Monitor and report on the level and quality of participation of these groups throughout project implementation.	SEP
Establishment and maintenance of a complaints mechanism	Section VIII of the Code of Administrative Procedure – Complaints and Petitions Article 11 of the Special Act on Flood Protection,	Compliance	The provisions provide for standard administrative mechanisms - the right to file complaints and petitions, the procedure for their consideration and registration, and the protection of complainants, as well as provisions for parties regarding the filing of appeals and bringing complaints before an administrative court.	N/A	N/A
Availability of the mechanism to all stakeholders	Article 221 of the Code of Administrative Procedure (right to file complaints and petitions) Article 11 of the Special Act on Flood Prevention,	Compliance	Appeal mechanisms are available primarily to parties to the proceedings. The right to file complaints and petitions in accordance with Section VIII of the Code of Administrative Procedure is guaranteed by the Constitution of the Republic of Poland and is available to all citizens.	N/A	N/A

7 SEF public disclosure

The PCU will disclose the SEF together with the ESMF and LARAF as part of a joint framework document package in draft form for public comment in accordance with ESS10 requirements prior to Appraisal by the World Bank. The draft SEF will be made available for public review and comment for a period of no less than 21 days before the document is finalized; comments received during this period will be considered and, where relevant, incorporated prior to finalization and disclosure of the approved SEF.

This SEF is a framework document. It outlines the principles and procedures for stakeholder engagement throughout the Project but does not yet identify specific locations, schedules, or lists of Project-Affected Persons (PAPs), as these will be defined for individual Tasks through the corresponding SEPs. Disclosure of a framework document therefore serves a different purpose than disclosure of a specific investment. It enables stakeholders to review the overall approach to stakeholder engagement, the structure of the GRM, and the principles governing information disclosure that will apply throughout the Project, rather than comment on locations or technical solutions that have not yet been determined. This SEF establishes the framework against which the content and disclosure of subsequent Task-level SEPs will be assessed for consistency.

Given the scale of the Project and the number of Regional Water Management Authorities involved, the SEF will be published electronically on the PCU website and the websites of the individual PIUs:

- RZGW Kraków (www.gov.pl/wody-polskie-krakow),
- RZGW Rzeszów (www.gov.pl/wody-polskie-rzeszow),
- RZGW Wrocław (www.gov.pl/wody-polskie-wroclaw),
- RZGW Warszawa (www.gov.pl/wody-polskie-warszawa).

It will also be made available in paper form at the offices of the relevant RZGWs:

- RZGW Kraków — ul. Marszałka Józefa Piłsudskiego 22, 31-109 Kraków
- RZGW Rzeszów — ul. Hanasiewicza 17B, 35-103 Rzeszów
- RZGW Wrocław — ul. Norwida 34, 50-950 Wrocław
- RZGW Warszawa — ul. Zarzecze 13B, 03-194 Warszawa

The public consultation meeting regarding the joint E&S social documents package will be held in the cities that are seats of the individual PIUs, with the possibility of electronic (remote) participation, allowing stakeholders from all areas covered by the Project to join without needing to travel to a single physical location.

As an alternative, additional in-person meetings could instead be organized at the level of individual powiats (counties) covered by the Project.

The final version of the SEF, following consultations, will set out how stakeholder feedback has been reflected in the SEF itself and, as appropriate, in the Project's environmental and social instruments.

Following World Bank approval, the PCU will disclose the SEF simultaneously in Polish and English to ensure equal and timely access for national stakeholders and international parties, including the World Bank. Information materials will be prepared in Polish in a format accessible to non-specialist audiences.

8 Stakeholder identification and analysis

8.1 Stakeholder engagement matrix

According to ESS10, a stakeholder is any individual or group that may be affected by the Project or have an interest in it. The stakeholder categories presented in the table below were developed based on an analysis of Project documentation, the socio-economic context of the Project areas, and experience gained during the implementation of previous World Bank-financed flood protection projects in Poland, and the context of recurring stakeholder concerns including the scale of anticipated physical displacement and loss of land, uncertainty regarding the basis for compensation, the adequacy and transparency of prior consultation, and potential impacts on local economic activity, including agriculture and tourism.

The stakeholder analysis has been undertaken as an iterative process, building on stakeholder engagement activities carried out during the identification and preparation of the Project and reflecting the ongoing development and prioritization of the proposed investments. The analysis has been informed not only by the identification of stakeholders that may influence or be affected by the Project, but also by previous engagement undertaken by the PCU, the RZGWs, and other competent institutions during the planning and development of potential flood protection measures.

In preparing this SEF, due consideration has also been given to concerns, comments, requests for information, grievances, and complaints previously submitted by stakeholders to the PCU, the respective RZGWs, and the World Bank. These past interactions have been reviewed to identify recurring issues, stakeholder expectations, areas of concern, and lessons learned relevant to the design of the stakeholder engagement process. This has enabled the Project to better understand stakeholder priorities, tailor engagement approaches to the specific characteristics of each subproject, and ensure that the engagement process addresses issues already raised by affected and interested parties.

An influence–interest matrix was used to assess each stakeholder category's level of interest in and influence over the Project. The results inform the selection of engagement methods and the level of engagement described in Chapter 8.

The level of interest reflects the significance of the Project for a given stakeholder category, including whether stakeholders actively seek information about the Project and engage with its implementation. The level of influence reflects a stakeholder category's ability to affect Project decisions, implementation schedules, or public acceptance of the investment.

Both attributes are assessed using a three-point scale:

- High – the category is directly and significantly affected by the Project, or has a real capacity to influence its course.
- Medium – the category is indirectly affected by the Project, or its ability to influence the Project is limited to specific aspects.
- Low – the category is only marginally affected by the Project, or lacks meaningful means to influence its course.

The recommended level of engagement is based on the combined assessment of each stakeholder category's level of interest and influence. It indicates how actively the PIU should engage with a given stakeholder category. The significance of potential impacts on each stakeholder category, presented in the table below, reflects the Project-level environmental and social risk and impact assessment set out in the ESMF.

The table below presents the identified stakeholder categories, their roles and types (PAP or other interested parties - OTH), their main concerns and expectations, and the resulting assessment of interest, influence, and recommended engagement intensity.

Table 3 Stakeholder Categories and Engagement Matrix

Category	Role and Description	Type	Main Concerns and Expectations	Significance of Potential Impacts	Level of Interest	Influence on the Project	Recommended Engagement Intensity
Farmers and agricultural producers	Individual farmers and agricultural enterprises. Particularly relevant for investments where agricultural land constitutes the majority part of the area to be acquired.	PAP	Fragmentation of land and residual plots; loss of income; level of compensation; continuity of EU subsidies; ability to continue agricultural production.	High	High	High	High
Residents and property owners	Individuals and households who reside in or own property within the area covered by the investment.	PAP	Loss of home and place of residence; level and form of compensation; relocation conditions; impact on social and neighborhood ties.	High	High	High	High
Businesses and employees	Business entities and their employees operating within the area covered by the investment, including local businesses and the tourism sector.	PAP	Loss of revenue and business continuity; relocation costs; changes to the character of the river; construction-related impact; compensation for lost profits.	High	High	High	High
Municipal government within the investment area	Representatives of local communities and owners of municipal property affected by the investment.	PAP	Loss of municipal infrastructure; impact on the local land use plan (MPZP); level and form of compensation; public sentiment; demographic and economic effects on the municipality.	High	High	High	High
Local government units outside the investment area (counties and voivodeships)	Authorities of counties and voivodeships. Representatives of local communities outside the area of direct investment implementation.	OTH	Timeliness of administrative proceedings; impact of the investment on the area of the local government unit; coordination with local and regional spatial development plans.	Low	Medium	High	Medium
Resource users without formal legal title	Individuals using land or natural resources without formal legal title, where identified at the SEP stage.	PAP	Risk of exclusion from compensation; uncertainty regarding legal status; lack of access to information on their entitlements.	Hihg	High	Low	High
Government and voivodeship administration	Authorities issuing key decisions (IPIP decisions, environmental decisions) and appellate bodies: voivodes and ministries.	OTH	Timeliness of proceedings; compliance with national law and the requirements of financing institutions.	Low	High	High	High
Managers of forests and protected areas	Institutions managing forests and protected areas within the investment area, including the State Forests (Lasy Państwowe) and landscape park administrations.	OTH	Potential impacts onforests and protected areas, Natura 2000 sites; provision of adequate mitigation and environmental compensation measures; early involvement in design to limit interference with protection regimes.	Medium	Medium	High	Medium

Category	Role and Description	Type	Main Concerns and Expectations	Significance of Potential Impacts	Level of Interest	Influence on the Project	Recommended Engagement Intensity
KOWR	State institution managing State Treasury agricultural land. Holder of potential replacement land for PAPs.	OTH	Availability and location of replacement land suitable for agricultural PAPs; land transfer procedures.	Medium	Medium	High	Medium
Flood protection beneficiaries	Communities and individuals who will benefit from the protection provided by the Project.	OTH	Effective and timely implementation of the investment; access to information on the scope and schedule of protection.	Low	Medium	Medium	Low
Managers of technical infrastructure	Entities managing roads, power grids, and telecommunications networks within the investment area.	OTH	Protection of managed infrastructure; agreement on relocation routes; works schedule.	Medium	Medium	Medium	Medium
Local communities affected by construction related impacts	Residents of areas affected by the investment whose properties are not being acquired, but who will experience indirect effects of Project implementation.	PAP	Traffic safety and construction-related impacts; noise and dust; reduced access to social infrastructure, recreational areas, and local resources; temporary utility interruption; hydrological changes; downstream water-level or flow changes; flood-risk redistribution; restrictions on recreation or use of rivers and forests; community health and safety risks; loss of local amenities or cultural landscape; construction camps and labour influx; induced or cumulative impacts; operation of reservoirs, polders and gates; emergency-preparedness arrangements. changes to the character and local identity of the area.	Medium	Medium	Medium	Medium
Downstream communities in the inundation corridor	Residents, property owners, and businesses downstream of dam and reservoir Tasks, in areas potentially affected by dam safety-related emergency scenarios	OTH	Dam safety and downstream flood risk; warning systems, evacuation routes and assembly points; flood inundation maps, flood wave arrival times, and expected water depths and flow velocities in the event of a dam failure; warning thresholds; roles of local authorities and community contact persons; access to timely and accurate information during emergencies; and access to the GRM.	High	Medium	Low	High

Category	Role and Description	Type	Main Concerns and Expectations	Significance of Potential Impacts	Level of Interest	Influence on the Project	Recommended Engagement Intensity
NGOs and media	Environmental coalitions, civil society organizations, and local and regional media.	OTH	Transparency; choice of technical solutions and siting; consultation and participatory processes; impact on ecosystems and protected areas; broader environmental and social impacts; dam safety; environmental and social justice.	Low	High	High	High

Legend: PAP (Project-Affected Parties) –individuals, households, and entities directly affected by the Project, in particular through land acquisition, resettlement, loss of livelihood, or loss of access to resources. OTH (Other Interested Parties) –entities that may have an interest in the Project, influence its course, or may be affected by its indirect effects, but are not subject to direct land acquisition or involuntary resettlement.

8.2 Vulnerable groups

Vulnerable groups are individuals and households that may face greater barriers to accessing information and participating in consultations, or that may be disproportionately affected by the Project's impacts.

Based on an analysis of the socio-demographic context of the areas covered by the Project, the following preliminary categories of vulnerable groups have been identified. The PIU will verify the presence of these categories within each Task area during Task specific SEP preparation and expand to include other groups and individuals.

Table 4 Vulnerable Groups and minimum mitigation measures

Category	Barriers to access to information and participation	Engagement Approach	Minimum mitigation measures
Elderly persons (70+)	Digital exclusion; limited mobility; hearing and vision impairments; chronic health conditions limiting participation in meetings.	In-person, non-digital engagement adapted to mobility and health limitations.	Ensuring access to information in non-electronic form; adapting the form and location of engagement to mobility and health limitations.
Persons with disabilities	Architectural barriers to accessing consultation venues; lack of materials in alternative formats; limited mobility.	Accessible in-person engagement with alternative-format materials.	Ensuring architectural and communication accessibility of the consultation process; enabling the submission of comments through a representative or in alternative form.
Digitally excluded persons	Lack of access to information published online; inability to submit comments electronically.	Non-digital information and submission channels.	Ensuring access to information and the ability to submit comments through non-electronic channels.
Low-income families	Limited resources to relocate independently; risk of being disproportionately burdened by resettlement costs; limited capacity to claim compensation and access grievance and appeal mechanisms.	Individualized, needs-based engagement.	An individualized approach to consultation; information on available support instruments; ensuring GRM accessibility for individuals with limited capacity to pursue their rights.
Women-headed households	Limited negotiating position in the compensation process; caregiving responsibilities limiting the ability to participate in meetings; limited financial and time resources.	Engagement scheduled around caregiving responsibilities.	Adapting the form and schedule of engagement to caregiving responsibilities; ensuring women heads of household have equal access to information and to the consultation process.
Children and youth	No direct voice in the decision-making process; lack of legal capacity in proceedings concerning real property; risk of overlooking the effects of resettlement on educational circumstances and peer relationships.	Indirect engagement through parents, guardians, and educational institutions.	Taking into account the perspectives of children and youth into consultations with parents and guardians; engaging educational institutions in the areas covered by the investment.

9 Stakeholder engagement program

9.1 Stages of engagement across the Project lifecycle

Stakeholder engagement takes place throughout the entire lifecycle of the Project. The table below sets out the key engagement activities at each stage. The detailed engagement schedule for each Task is set out in the SEP developed by the PIU.

Although the phasing described below applies primarily to activities involving civil works and infrastructure, the same phased approach, as appropriately adapted, will also apply to institutional and non-infrastructure activities, such as the Hydroclimatic Monitoring Centre, Crisis Management Centres, and forecasting and early warning systems. For such activities, the scope of consultation and information disclosure will be defined in task-specific SEPs.

For tasks involving large dams and reservoirs, stakeholder engagement includes dedicated consultation with downstream riparian communities within the inundation corridor, in support of the EPP. These consultations will gather local knowledge to inform EPP preparation. Once hydraulic and dam-break modelling has been completed, further consultation with the same communities will be carried out to validate the EPP's assumptions and content prior to finalization.

Where an existing dispute or heightened social sensitivity is identified in relation to the Project, the PIU will continue stakeholder engagement activities under this Chapter and will adapt them as needed in ongoing planning. Where necessary, the PIU may apply additional measures, such as an independent facilitator or neutral mediator, or alternative independent channels for stakeholder outreach. Such measures do not imply that the affected stakeholders are a vulnerable group, but rather reflect a Project-specific response to concerns regarding mistrust, bias, or reduced credibility of the consultation process.

Table 5 Stages of stakeholder engagement across the Project lifecycle

Stage	Purpose	Key Topics/Information	Target Stakeholders	Methods	Timing	Responsible	Outputs
1. Project Identification and Strategic Planning	Introduce the Project, explain the overall objectives and proposed programme of investments, identify stakeholders and understand local priorities and expectations.	Project objectives; proposed investment programme Project area; preliminary list of investments; Project implementation arrangements; ESF requirements; Stakeholder Engagement Framework; Grievance Mechanism.	Government institutions, RZGWs, municipalities, NGOs, local communities, flood protection beneficiaries, academia, media.	Introductory meetings; stakeholder mapping; bilateral meetings; workshops; publication on PCU and RZGW websites; information leaflets.	At Project preparation.	PCU with PIUs	Stakeholder database; stakeholder analysis; updated SEF; record of initial stakeholder concerns.
2. Feasibility Studies and Preliminary Screening	Obtain local information to support feasibility studies and identify environmental and social constraints before design progresses.	Feasibility study objectives; preliminary engineering concepts; screening results; identification of sensitive receptors; potential Associated Facilities; initial environmental and social risks.	Municipalities, environmental authorities, PAPs, NGOs, technical institutions, utility providers.	Technical workshops; bilateral meetings; site visits; targeted consultations.	During feasibility studies.	PIUs and Design Consultant	Refined Project scope; identification of key risks and constraints.
3. Alternatives Assessment and Concept Design	Ensure stakeholders participate while alternatives remain under consideration and before key decisions are taken.	Alternative flood protection solutions; alternative alignments; flood storage concepts; optimization studies; preliminary flood modelling; land take comparisons; environmental and social trade-offs; preliminary cost-benefit assessment.	PAPs, municipalities, downstream communities, NGOs, environmental authorities, emergency services, technical experts.	Public workshops; design charrettes; visual maps; GIS presentations; flood simulations; focus groups; household meetings with potentially affected landowners.	Before selection of preferred alternative.	PIUs with Design Consultant	Stakeholder comments incorporated into alternative assessment; consultation report.
4. Preferred Design Development	Present the preferred design and explain how stakeholder comments influenced its development.	Preferred design; optimization results; updated flood modelling; preliminary land acquisition requirements; anticipated impacts; mitigation measures; construction footprint.	PAPs, municipalities, businesses, NGOs, environmental authorities, emergency services.	Public meetings; technical presentations; one-to-one meetings with PAPs; disclosure through websites and municipal offices.	During detailed design.	PIUs	Revised design reflecting stakeholder input where feasible.

Stage	Purpose	Key Topics/Information	Target Stakeholders	Methods	Timing	Responsible	Outputs
5. Disclosure of Draft Environmental and Social Instruments	Obtain comments on draft environmental and social instruments before their finalization and approval.	Draft ESIA; ESMP; RAP; Biodiversity documents; Traffic Management Plan; SEP; other relevant E&S instruments. Documents disclosed on PCU and RZGW websites and through municipal offices for at least 30 calendar days prior to consultation meetings.	All stakeholders including vulnerable groups.	Website disclosure; hard copies at municipal offices; written consultation period; public consultation meetings; targeted consultations; household visits where necessary.	Prior to final approval of E&S instruments.	PIUs with PCU oversight	Consultation report; updated E&S instruments; disclosure of final documents.
6. Final Design, Permitting and IPIP Process	Inform stakeholders of the final design, statutory approvals and implementation schedule.	Final engineering design; final flood modelling results; consultation outcomes; responses to comments; IPIP process; implementation schedule; land acquisition programme.	PAPs, municipalities, permitting authorities, government agencies, utility companies.	Public information meetings; website updates; direct notifications to PAPs; bilateral meetings.	Prior to commencement of land acquisition and procurement.	PIUs	Stakeholders informed of final Project arrangements.
7. Procurement and Contractor Mobilisation	Introduce the Contractor and communicate how construction will be managed.	Contractor information; construction methodology; construction schedule; working hours; Code of Conduct; Community Health and Safety measures; grievance mechanism; traffic management; emergency contacts.	PAPs, neighbouring communities, municipalities, businesses, emergency services, media.	Community meetings; newsletters; website updates; information boards; media briefings.	Prior to commencement of works.	PIUs and Contractor	Community informed before construction starts.
8. Construction Phase	Maintain continuous engagement and address construction-related impacts throughout implementation.	Monthly work programme; construction progress; road closures; temporary access restrictions; utility interruptions; monitoring results; grievance statistics; environmental and social performance; significant incidents where appropriate.	PAPs, neighbouring residents, businesses, municipalities, emergency services, NGOs, media.	Community liaison meetings; household notifications; newsletters; information boards; social media; website updates; grievance mechanism; regular meetings with municipalities.	Throughout construction.	Contractor under PIU supervision	Ongoing communication; timely resolution of grievances; documented stakeholder engagement records.
9. Significant Design Changes or	Ensure stakeholders remain informed and consulted when	Design modifications; additional land acquisition; revised environmental and	Stakeholders affected by the proposed changes.	Additional disclosure; targeted consultation meetings; re-disclosure	Whenever significant changes occur.	PIUs with PCU oversight	Updated documentation; consultation

Stage	Purpose	Key Topics/Information	Target Stakeholders	Methods	Timing	Responsible	Outputs
Emerging Issues	material Project changes occur.	social instruments; Associated Facilities; revised flood modelling; additional mitigation measures.		of revised documents where required.			reports; revised mitigation measures.
10. Completion, Commissioning and Operation	Inform stakeholders about Project completion, operation and long-term monitoring arrangements.	Completion of works; operational arrangements; monitoring results; maintenance programme; emergency preparedness measures; continued grievance mechanism; lessons learned.	Flood protection beneficiaries, municipalities, emergency services, NGOs, general public.	Public information meetings; publication of monitoring reports; website disclosure; media releases.	At commissioning and during operation.	Relevant RZGW / Asset Operator	Stakeholders informed of operational arrangements and monitoring outcomes.
Continuous Throughout the Project Lifecycle	Ensure ongoing transparency, accessibility of information and meaningful stakeholder participation.	Project updates; implementation progress; grievance mechanism; consultation records; environmental and social monitoring; procurement notices where applicable; contact details; frequently asked questions.	All stakeholders.	PCU and RZGW websites; municipal notice boards; social media; newsletters; email notifications; direct correspondence; grievance mechanism; periodic meetings.	Continuous.	PCU, PIUs, Contractors and Supervising Engineers (within their respective responsibilities).	Continuous compliance with ESS10; informed stakeholders; effective grievance resolution; documented engagement activities.

9.2 Stakeholder needs, engagement methods and communication channels

The PIU adapts engagement methods and communication channels to the needs of individual stakeholder categories. The choice of methods takes into account the level of interest in the Project, the capacity to participate in consultations, and barriers to accessing information.

The Project is being implemented in a complex stakeholder environment. In certain areas where investment options are still being explored, there is already a high level of public scrutiny and stakeholder tension**..** Engagement methods must take this context into account. Where open public meetings could increase the risk of social tension, the PIU uses safer alternative formats instead, such as individual consultations with PAPs, information points, expert panels, or study walks. In all cases, the engagement methods used must give stakeholders a genuine opportunity to express their views, ask questions, and raise concerns. In situations of high social tension, the PIU may engage a neutral mediator or an organization trusted by the local community. Communication channels relying on intermediation by local governments or local media may have limited effectiveness where these entities are themselves actively involved in a dispute concerning the Project; in such cases, the PIU identifies alternative channels for reaching stakeholders and specifies them in the SEP. The PIU selects engagement methods appropriate to the current social situation and justifies this choice in the SEP. This approach is consistent with the principles set out in Chapter **Błąd! Nie można odnaleźć źródła odwołania.**.

Where a PAP or another stakeholder declines to engage, the PIU records such instances in the consultation and grievance documentation maintained for the Task, using reasonable and proportionate means given the scale of engagement involved**,** and uses alternative communication channels. A refusal to engage does not release the PIU from its obligation to disclose information or to provide access to the GRM.

Given the complexity of flood protection planning, and the existence of differing stakeholder views regarding certain technical solutions and proposed investment locations, the Project adopts a proactive stakeholder engagement and communication approach throughout the planning and design process. The objective is to ensure that PAPs and other interested stakeholders are informed and meaningfully engaged from the earliest stages of Project development, while alternative solutions are still being explored and key decisions have not yet been finalized.

Stakeholders are provided with timely and accessible information on the objectives of the Project, the planning process, the technical and environmental constraints influencing the development of flood protection measures, and the efforts undertaken by the PCU, the PIUs, and the design consultants to avoid or minimize environmental and social impacts. This includes regular communication on the identification and assessment of alternative technical solutions and locations, the optimization of Project designs to reduce land acquisition and other adverse impacts, and the measures being considered to address stakeholder concerns.

As design progresses, stakeholders are consulted on the comparative assessment of alternatives and presented with preliminary engineering concepts, flood modelling results, environmental and social assessments, and the rationale for selecting or rejecting particular options. Where alternatives are found to be technically infeasible, environmentally unacceptable, economically disproportionate, or incapable of achieving the required level of flood protection, the reasons for

their exclusion are clearly explained. Stakeholders are also informed of how comments received during consultations have influenced the evolution of the preferred solution and the adoption of mitigation measures.

The engagement process recognizes that flood protection projects must be planned and assessed at the river basin and catchment level. The Project therefore seeks to explain the interrelationship between individual investments within the wider flood management system, enabling stakeholders to understand how local interventions contribute to achieving the overall flood protection objectives.

The table below sets out the minimum requirements for engagement methods and channels for each stakeholder category. The PIU may apply methods and channels that go beyond this minimum, adapting them to the specifics of a given Task. For categories identified as vulnerable groups, the PIU applies the additional engagement measures described in Chapter 9.3. Following each round of consultation, the PIU informs stakeholders of how their comments were taken into account in project decisions.

Table 6 Stakeholder needs, engagement methods, and communication channels

Stakeholder Category	Information Needs	Engagement Methods	Communication Channels
Farmers and agricultural producers	Scope and schedule of land acquisition; scope of restrictions or loss, entitlements and principles for determining level of compensation for land and crops; impact on EU subsidies and mitigation measures; ability to continue agricultural activity and potential restrictions, access to replacement land and livelihood assistance and support. access to the GRM.	Individual invitations and direct outreach, individual meetings with PAPs; adapting the meeting format to PAP needs; possible engagement of a neutral mediator.	Direct contact; channels accessible to digitally excluded persons; PIU website for information concerning a larger group while the principle for topic related to land acquisition and restrictions remain to be in direct individualized contacts.
Residents and property owners	Scope of property acquisition; scope of restrictions or loss, entitlements and principles for determining entitlements and compensation; relocation options and support provided by the Project ; access to the GRM.	+Individual meetings with PAPs; adapting the meeting format to PAP needs; possible engagement of a neutral mediator.	Direct contact; channels accessible to digitally excluded persons; PIU website Direct contact; channels accessible to digitally excluded persons; PIU website for information concerning a larger group while the principle for topic related to land acquisition and restrictions remain to be in direct individualized contacts.
Businesses owners and employees	Scope and schedule of property acquisition; compensation for lost profits and relocation costs; conditions for continuing operations. access to the GRM.	Individual meetings with PAPs; possible engagement of a neutral mediator.	Direct contact; PIU website.
Resource users without formal legal title	Information on their entitlements; procedures for identification and inclusion in the compensation process; access to the GRM.	Individual meetings; proactive, context-sensitive outreach by the PIU.	Direct contact; PIU website; channels accessible to digitally excluded persons.
Municipal government within the investment area	Scope and schedule of the investment; impact on municipal infrastructure and the local land use plan; procedures for the acquisition of municipal property; opportunities for cooperation.	Working meetings; official correspondence; participation in	Formal correspondence; direct contact; the Public Information Bulletin (BIP).

Stakeholder Category	Information Needs	Engagement Methods	Communication Channels
	For institutional and non-structural Tasks, the scope, functionality, and implementation schedule of the relevant system or center.	administrative proceedings.	
Local government units outside the investment area (counties and voivodeships)	Scope and schedule of the investment; impact on the area of the local government unit; administrative procedures. For institutional and non-structural Tasks, the scope, functionality, and implementation schedule of the relevant system or center.	Working meetings; official correspondence.	Formal correspondence; the Public Information Bulletin (BIP).
Government and voivodeship administration	Project scope; technical, environmental, and social documentation; schedule of administrative proceedings. For institutional and non-structural Tasks, the scope, functionality, and implementation schedule of the relevant system or center.	Institutional meetings; formal correspondence; participation in EIA and IPIP proceedings.	Formal correspondence; the Public Information Bulletin (BIP); direct contact.
KOWR	Scope of acquisition of State Treasury agricultural land; schedule; availability of replacement land.	Working meetings; formal correspondence.	Formal correspondence; direct contact.
Managers of forests and protected areas	Scope of forest and protected area acquisition; schedule; environmental compensation requirements. For institutional and non-structural Tasks, the scope, functionality, and implementation schedule of the relevant system or center.	Working meetings; formal correspondence.	Formal correspondence; direct contact.
Managers of technical infrastructure	Scope and schedule of works conflicting with managed infrastructure; relocation routes; technical conditions. For institutional and non-structural Tasks, the scope, functionality, and implementation schedule of the relevant system or center.	Working meetings; formal correspondence.	Formal correspondence; direct contact.
Local community affected by construction-related impacts	Scope and schedule of works; environmental and social infrastructure impacts; measures to mitigate construction-related impacts. access to the GRM.	Information disclosure; use of neutral local channels, independent of parties involved in the dispute.	PIU website; local media; notice boards.
Downstream communities in the inundation corridor	Dam safety and downstream flood risk; warning thresholds and alerting systems; flood wave characteristics (arrival time, depth, and velocity); evacuation routes and assembly points; roles of local authorities and emergency contacts; access to the GRM.	Information disclosure; use of neutral local channels, periodic public updates. Technical workshops with responsible institutions; training sessions; consultation on system design and	Channels accessible to digitally excluded persons; PIU website; local media; notice boards

Stakeholder Category	Information Needs	Engagement Methods	Communication Channels
		operational protocols.	
NGOs and media	Project objectives and impacts; environmental and social documentation; consultation outcomes and how comments were addressed. access to the GRM. For institutional and non-structural Tasks, the scope, functionality, and implementation schedule of the relevant system or center.	Information meetings; disclosure of documentation; responses to media inquiries.	PIU website; local and regional media; social media.
Beneficiaries of flood protection	Scope and schedule of flood protection measures; benefits to the community. access to the GRM. For institutional and non-structural Tasks, the scope, functionality, and implementation schedule of the relevant system or center.	Information disclosure; use of neutral local channels, periodic public updates on implementation progress and benefits. Technical workshops with responsible institutions; training sessions; consultation on system design and operational protocols.	PIU website; local media; notice boards.
Users of non-structural Tasks	Scope and functionality of the system or center; implementation schedule; operational and coordination arrangements; training and onboarding requirements; access to the GRM.	Working meetings and technical workshops with responsible institutions; training sessions; consultation on system design and operational protocols.	Formal correspondence; direct institutional contact; PIU and relevant institution websites.

9.3 Strategy for engaging vulnerable groups

Individuals from vulnerable groups may face greater barriers to accessing information and participating in consultations. In these cases, standard engagement methods may not be sufficient. A differentiated approach, tailored to the specific characteristics of each group, is therefore required.

Detailed measures for engaging vulnerable groups are set out in the SEP for each Task.

The table below sets out the minimum requirements for removing barriers to accessing information and participating in consultations.

Table 7 Minimum requirements for removing barriers to engagement

Type of Barrier	Minimum Requirements
Digital and communication barriers	Providing alternative, non-internet-based channels of information; drafting content in plain language; enabling the submission of comments verbally or by phone (with a written record kept); engaging a sign language interpreter where needed
Architectural barriers	Selecting meeting venues in buildings accessible to persons with disabilities; where justified, providing the option of consultation at the PAP's place of residence, by phone, or through a representative or guardian; adapting the form of engagement to the PAP's limitations.
Time and caregiving barriers	Adapting the schedule and format of meetings to the availability of individuals caring for children or dependents.
Economic barriers	Organizing consultations in a manner that minimizes costs to the PAP.
Lack of a direct voice in the decision-making process (children and youth)	Enabling the expression of views through simplified, age-appropriate, and safe contact channels.
Cultural and social barriers	Engaging with stakeholders through channels and formats consistent with local communication norms; where relevant, engaging trusted local intermediaries (e.g., community leaders, local organizations) to support outreach and build confidence in the engagement process.
Legal and administrative barriers	Providing plain-language explanations of applicable procedures and PAP rights; offering assistance in completing formal submissions; making a PIU point of contact available to guide PAPs through administrative steps.
Gender-related barriers and biases	Ensuring that both women and men within a household have independent access to information and an independent opportunity to express their views, including in negotiations concerning compensation; not relying solely on the household member formally holding legal title to land or property as the sole point of contact.
Institutional/representation barriers	Institutional and systemic barriers may limit some groups' access to public authorities or GRM, or prevent their views from being independently considered in decision-making processes. Minimum requirements include simplifying access to formal institutions and the GRM, for example through PIU facilitation, and proactively identifying groups affected by such barriers, with their views obtained and recorded directly and independently, rather than relying on representation by other community members or institutions that may not fully reflect their interests.

9.4 Information disclosure

The PIU discloses information about the Project to stakeholders in a timely manner and in an accessible and understandable form. Disclosure of information precedes public consultation – stakeholders must have sufficient time to review documents before expressing their views. As a statutory minimum under Polish law, the public consultation period is 21 days for Project-level framework documents (SEF, LARAF, ESMF, ESCP) and 30 days for Task-level documents (SEP, ESIA, ESMP, LARAP), during which the disclosed document remains available for review and comment; the applicable period for each document is set out in Table 7.

The PIU ensures that disclosed information is accessible to digitally excluded groups, in accordance with the principles set out in Chapter 8.4. The consultation principles for this SEF are described in Chapter 6. Table 6 sets out disclosure requirements for the Project's environmental and social instruments; in addition, throughout Task preparation and implementation, the PIU discloses and announces presentations of the design and its alternatives, meetings held to

present these, regular community meetings, and meetings held in response to concerns raised by the community, in accordance with the engagement stages set out in Table 3. For Tasks involving dam construction, modernization, or reservoir operations, the PIU shall ensure the proactive disclosure and plain-language explanation of critical hydraulic risk information to downstream communities. Such disclosure shall be provided at a stage that allows meaningful stakeholder engagement and maintained throughout the Project lifecycle, and shall cover dam-break inundation maps (flood zones), flood wave arrival times (travel times to specific locations), expected water depths and flow velocities, warning thresholds and alerting levels, evacuation routes and designated assembly points, and the roles of local authorities, emergency services, and designated community contact persons.

Table 8 Disclosure Requirements

Document	Level	Disclosure Timing	Channels	Languages
SEF	Project	21-day public consultation period; comments incorporated and final document disclosed prior to Project Appraisal by the Bank	PCU and PIU website; offices of the individual RZGWs	Polish and english
LARAF	Project	21-day public consultation period; comments incorporated and final document disclosed prior to Project Appraisal by the Bank	PCU and PIU website; offices of the individual RZGWs	Polish and english
ESMF, ESCP	Project	21-day public consultation period; comments incorporated and final document disclosed prior to Project Appraisal by the Bank	PCU and PIU website; offices of the individual RZGWs	Polish and english
SEP	Task	In accordance with the Task-level engagement schedule; 30-day public consultation period; comments incorporated prior to finalization	PCU and PIU website; the relevant RZGW office; notice boards	Polish and english
ESIA and ESMP	Task	In accordance with the Task-level engagement schedule set out in the SEP; 30-day public consultation period; comments incorporated prior to finalization	PCU and PIU website; the relevant RZGW office; notice boards	Polish and english
LARAP (draft)	Task	In accordance with the Task-level engagement schedule; 30-day public consultation period; comments incorporated prior to finalization	PCU and PIU website; the relevant RZGW offices; notice boards; local media	Polish and english
EPP	Task	In accordance with the Task-level engagement schedule; 30-day public consultation period; comments incorporated prior to finalization; at least 30 days before the end of the comment period	PCU and PIU website; the relevant RZGW offices; notice boards; municipal offices; local media; direct distribution to affected/downstream communities	Polish and english

Following each round of consultation, the PIU informs stakeholders of how their views influenced decisions concerning the Project. Updated documents include a chapter summarizing the course of the consultation and how the comments received were addressed. The PIU discloses updated documents following any significant change to the Project scope.

In addition to the statutory disclosure and consultation requirements applicable to environmental and social instruments, the Project will implement a continuous stakeholder engagement programme throughout the Project lifecycle. Stakeholder engagement will be undertaken at key decision-making stages, including during the identification and assessment of alternative

solutions, optimisation of the preferred design, disclosure of preliminary and final design concepts, preparation of flood modelling, implementation of land acquisition activities, commencement of construction, and throughout Project implementation. Additional engagement activities will also be organised whenever significant stakeholder concerns emerge, substantial design modifications are proposed, or issues raised through the grievance mechanism indicate the need for further consultation. This approach is intended to ensure that stakeholders have meaningful opportunities to provide input before investment decisions including technical solutions and siting are finalised and throughout Project implementation, in accordance with the principles of ESS10.

10 Grievance Redress Mechanism (GRM)

10.1 Definition and purpose of the GRM

The Grievance Redress Mechanism (GRM) is an accessible and inclusive system for receiving, registering, addressing and facilitating the timely resolution of grievances raised by stakeholders. The GRM accepts grievances relating to the Project's environmental and social performance – complaints, requests, questions, and comments related to the preparation and implementation of Tasks. This same GRM also serves as the grievance mechanism required under ESS5 for grievances relating to land acquisition, resettlement, and compensation; specific procedures applicable to such grievances are set out in the LARAF and the corresponding LARAP.

The GRM performs four core functions:

1. It provides persons affected by the Project with effective access to means of protecting their rights.
2. It supports the early identification and resolution of environmental and social issues, as well as broader issues relating to technical matters, fiduciary management, procurement, and contract management.
3. It builds public trust in the Project.
4. It provides a safe and confidential channel for SEA/SH cases, based on a survivor-centered approach.
5. It provides a channel for collecting stakeholder feedback on the Project.

The Project comprises multiple Tasks implemented in different locations and by different contractors. Accordingly, the GRM must be designed in a manner proportionate to the specific characteristics, scale, and environmental and social risks of a given Task or group of Tasks. The GRM is established at the earliest possible stage of Task preparation and is supported by adequate human and financial resources. This chapter sets out the minimum requirements and principles that every GRM established under the Project must meet. Detailed, Task-specific operational procedures are developed on the basis of the GRM template provided in Appendix 8 to the ESMF and must be consistent with the framework requirements set out in this chapter.

[link to the Appendix 8 of ESMF]

The GRM described in this SEF is intended for communities and external stakeholders. It is separate from the workers' grievance mechanism, which is established and operated in accordance with the procedures set out in the Labor Management Procedures (LMP) developed under the Project in accordance with the requirements of ESS2.

The GRM does not replace national administrative and judicial procedures. It does not restrict a complainant's access to judicial and administrative remedies.

10.2 GRM structure under the Project

This Stakeholder Engagement Framework (SEF establishes the minimum requirements, principles, scope, organizational requirements, and reporting standards for all GRMs under the Project. Every GRM developed at the Task level must comply with these requirements. A template Project-level GRM, ensuring consistency across all Tasks, is provided in Appendix 8 of the ESMF.

The Task-level GRM is developed by the PIU for each Task under the Project. It sets out the detailed operational procedures, reporting channels, timeframes, and organizational structure specific to the given Task. The Task-level GRM is subject to approval by the PCU prior to its launch. Given the Project's scale and the multi-level GRM structure at Task level, the PCU, in cooperation with the PIUs, will maintain GRM records (including case records, status, and resolution data) in a standardized format across all Tasks, supported where feasible by a case management system, to facilitate monitoring and aggregate Project-level reporting.

The GRM for external stakeholders operates independently of the workers' grievance mechanism. The workers' GRM is established and operated by the Contractor in accordance with the Labor Management Procedures (LMP), pursuant to the requirements of ESS2. An external stakeholder may only use the GRM described in this chapter.

10.3 General principles

All GRMs established under the Project operate in accordance with the following principles.

- The scope and type of the GRM are proportionate to the scale of risks and impacts of the given Task. A GRM for Tasks of larger scale or higher environmental and social risk may require more developed structures and resources. A GRM for smaller-scale Tasks may be simpler. Proportionality does not exempt a GRM from meeting all the minimum requirements set out in this SEF.
- Use of the GRM is free of charge for the complainant. The PIU covers all costs associated with receiving and addressing grievances.
- The GRM is accessible to all stakeholders without discrimination. Grievances are accepted through written, oral, electronic, and telephone channels. The GRM takes into account the needs of vulnerable groups, in particular the elderly, persons with disabilities, and persons with limited mobility.

- The complainant's personal data is protected in accordance with data protection legislation. The complainant's identity is not disclosed without their consent, except where required by law.
- No person suffers adverse consequences as a result of submitting a grievance.
- Grievances are addressed objectively and without bias.
- GRM procedures are publicly available. The complainant receives information on the progress of the process, the person responsible for handling it, and binding deadlines.
- All actions are documented in the GRM register.
- The GRM sets binding deadlines at three levels: acknowledgment of receipt of the grievance, provision of an interim response, and issuance of a final resolution. The complainant receives regular updates on the status of the case. The complainant has the right to request that the case be reconsidered if dissatisfied with its handling. The GRM ensures that the case is reviewed again in such an event.
- The GRM may provide for mediation as an option for a complainant who is dissatisfied with the proposed resolution. The decision to initiate mediation rests with the complainant. Mediation does not replace the appeals process.
- The GRM does not restrict access to administrative and judicial remedies. The complainant retains the right to pursue claims through these channels at any stage of the proceedings.

10.4 Scope of the GRM

The GRM serves to receive and address grievances raised by stakeholders concerning the Project's environmental and social performance. It provides persons affected by the Project with accessible and inclusive means of raising issues and grievances throughout the entire Task implementation cycle.

Each GRM functions as a single point of entry for all grievances relating to a given Task. This includes complaints and reports of violations, requests and proposals, questions and requests for information, and opinions and feedback concerning the implementation of the Task.

The substantive scope of each GRM covers, at a minimum:

- environmental and social impacts of the design and implementation stages, as well as broader technical, fiduciary, procurement, and contract management matters,
- the PIU's information and communication obligations,
- land acquisition and the payment of compensation,
- the course of resettlement and livelihood restoration,
- the conduct of personnel employed by the PIU, the Consultant, and the Contractor.

The GRM established for a given Task simultaneously functions as the mechanism required under ESS5 in relation to resettlement, and under ESS8 in relation to cultural heritage. The workers'

grievance mechanism operated at the contract level functions separately, in accordance with ESS2.

The scope of each GRM also covers grievances relating to sexual exploitation and abuse and sexual harassment (SEA/SH) arising in connection with the implementation of the Task. In accordance with World Bank requirements, SEA/SH cases require a separate, safe, and fully confidential procedure, based on a survivor-centered approach. Under this procedure, modified registration requirements apply – the GRM does not record data identifying the survivor. The first and priority action of the GRM in the case of an SEA/SH report is to refer the survivor to the appropriate support services. Detailed requirements for the SEA/SH procedure are set out in Chapter 10.8.

The scope of the GRM further covers grievances relating to matters falling, by operation of law, within the exclusive competence of external authorities – including appeals against administrative decisions, requests for reconsideration or annulment of decisions, complaints to administrative courts, and proceedings conducted by state oversight and law enforcement bodies. The GRM registers such grievances and informs the complainant of the appropriate legal avenue, but it does not replace these proceedings or interfere with their substantive resolution.

10.5 Minimum organizational requirements

The PIU defines clear roles, responsibilities, and authorities for all persons involved in the operation of the GRM, in accordance with ESS10 requirements. Each GRM has a designated GRM Coordinator and is supported by human and financial resources proportionate to the scale and risks of the Task. The design of the GRM is based on an understanding of the issues likely to be raised by stakeholders for the given Task, informed by the environmental and social assessment conducted under ESS1.

The GRM Coordinator resolves straightforward cases independently, while referring complex cases and requests for reconsideration to the GRM Committee. The GRM is linked to the Project's decision-making structures so that identified issues can be promptly addressed by persons authorized to make decisions.

Each GRM has a multidisciplinary GRM Committee, which reviews cases referred by the Coordinator, as well as cases in which the complainant has requested reconsideration. The complainant has the right to request such reconsideration, which results in the case being reviewed again by the Committee. The function of receiving grievances is separated from the function of conducting the investigation – these will be carried out by different individuals.

The composition of the GRM Committee is defined for each Task and documented in the GRM Register; as a rule, it does not include representatives of project-affected people as standing or voting members, since in the context of small, close-knit local communities, persons holding local public functions (e.g. sołtys) are typically themselves affected by the Task, which would give rise to a conflict of interest. Instead, the GRM's understanding of, and connection with, the affected community is ensured through: (i) consultation, by the GRM Coordinator or Committee, with locally recognized persons (e.g. sołtys, community organizations) for the purpose of gathering relevant contextual information about the case, without such persons participating in

its resolution; and (ii) the complainant's right to be accompanied, during the handling of their case, by a person of their choice for support (e.g. a family member or representative of a community organization), consistent with the survivor-centered approach applied to SEA/SH cases under Chapter 9.8. Impartiality of the GRM Committee's composition is further safeguarded by the complainant's right to request reconsideration of a decision, as well as by access to independent mechanisms, including the World Bank's Grievance Redress Service and the courts.

The PIU ensures the continuity of GRM operations across the different stages of Task implementation. Arrangements for the continuity of the GRM during the construction stage are confirmed prior to the commencement of works.

All personnel involved in operating the GRM receive regular training. This training covers, at a minimum:

- the objectives and principles of the GRM,
- the roles and responsibilities of individual personnel,
- procedures for receiving grievances, and
- a zero-tolerance policy on retaliation against complainants.

All Contractor personnel complete mandatory SEA/SH training before the commencement of works.

The handling of SEA/SH reports is assigned to a designated person separate from the person receiving other grievances. This person's role is limited to safely receiving the report and referring the survivor to appropriate support services – the designated person will not conduct an investigation into the SEA/SH case. The handling of these reports based on a survivor-centered approach, in which the survivor's safety and wellbeing are treated as the priority, in accordance with World Bank requirements. Detailed organizational requirements for the SEA/SH procedure are set out in Chapter 10.8.

Oversight of the proper functioning of all GRMs under the Project is exercised by the PCU, which verifies their compliance with the requirements of this SEF. The PCU will not interfere with the substantive resolution of individual cases.

10.6 Accessibility and reporting channels

Every GRM is multichannel. Available channels include both traditional and electronic forms, as well as the option to submit a grievance during consultation meetings and field visits by Project personnel. Grievance submission procedures are simple and understandable for all stakeholders.

Each GRM has at least one physical intake point located within the area affected by the Task. At all intake points, a paper-based grievance form is made available, together with information describing the available channels, resolution timeframes, and the complainant's rights.

Every GRM accepts anonymous grievances. Anonymous grievances are handled on an equal footing with named grievances. Where no contact details are provided, feedback cannot be given to the complainant – the GRM informs complainants of this limitation in its information leaflet.

Every GRM documents oral grievances. The person receiving the grievance prepares a written note, which is promptly recorded in the GRM register.

Every GRM is accessible to vulnerable groups, in particular the elderly, persons with disabilities, and digitally excluded persons.

The PIU publicly discloses information about the GRM, including the available channels, resolution timeframes, and the complainant's rights, on the Project website, at PAP information points, and at the offices of local municipalities within the area affected by the Task. This information is updated following any significant change to the GRM.

In accordance with World Bank requirements, every GRM provides safe and confidential channels for reporting SEA/SH cases, including the option to report anonymously. The PIU informs the community and Project personnel of these channels. The survivor is informed of any legal obligations under Polish law requiring Project institutions to report such cases.

10.7 Resolution timeframes

Each GRM sets binding timeframes for the resolution of grievances. In accordance with ESS10 requirements, these timeframes cover three levels: acknowledgment of receipt, an interim response, and a final resolution. The timeframes are publicly disclosed in GRM information materials.

The GRM registers each grievance promptly upon receipt and confirms receipt to the complainant within the same timeframe.

Each GRM provides for an expedited track for straightforward cases, a standard track for cases not requiring a detailed investigation, and an extended track for complex cases requiring the collection of documentation or expert opinions. This SEF sets a maximum timeframe of 30 days from registration of the grievance for issuing the final resolution; the SEP for a given Task may set a shorter deadline, taking into account the scale and risks of the Task. The specific timeframes applicable to each track are set out in the SEP accordingly.

In accordance with ESS10 requirements, where the applicable deadline cannot be met, the GRM Coordinator will inform the complainant of the reasons for the delay and will agree a new deadline with them. This approach applies to cases requiring coordination with multiple entities or a detailed investigation.

The complainant has the right to request reconsideration within a specified period from the date of receipt of the response. The GRM Committee issues its final position without undue delay from the date the request is received. The timeframes for both of these actions are set out in the SEP.

SEA/SH reports are not subject to standard timeframes. The GRM Coordinator refers the survivor to appropriate support services immediately upon receipt of the report.

10.8 Dedicated SEA/SH procedure

This Section should be read together with the Accountability and Response Framework for SEA/SH, the requirement for which is established under the ESMF and the corresponding provisions of LMP. Prior to authorizing mobilization for each Task, the PIU verifies that the Contractor's C-ESMP includes an Accountability and Response Framework meeting the requirements set out in the ESMF.

Every GRM includes a dedicated procedure for handling reports of sexual exploitation and abuse (SEA) and sexual harassment (SH), operating independently of the standard GRM procedure. In accordance with World Bank requirements, the design and implementation of this procedure are based on a survivor-centered approach, in which the survivor's safety and wellbeing are treated as the priority at every stage.

Any action involving the survivor is taken only with their informed consent. This principle applies to adult survivors. In the case of minors, the best interests of the child take precedence – the GRM promptly involves the appropriate child protection services.

The GRM does not conduct investigations into SEA/SH cases. The role of the GRM is limited to:

- receiving the report,
- referring the survivor to appropriate support services,
- assessing the employer's capacity to conduct an investigation, including the risks and implications of any mandatory reporting obligations under Polish law, in particular where the case involves a minors, in accordance with the LMP,
- notifying the PCU in all cases.

The PCU shall notify the World Bank of all SEA/SH cases, without exception, in accordance with the Environmental and Social Incident Response Toolkit (ESIRT) requirements, as set out in the Project’s Environmental and Social Commitment Plan (ESCP).

In accordance with World Bank requirements, the GRM informs the survivor of any legal obligations under Polish law to report such cases to law enforcement authorities.

The GRM further provides multiple safe and confidential channels for reporting SEA/SH, including the option to report anonymously. The GRM does not attempt to identify or make contact with an anonymous survivor.

The GRM register records only the following information for SEA/SH reports:

- the nature of the incident,
- information on the perpetrator's connection to the Project.
- the age and gender of the survivor, where available and provided with the survivor's consent,
- whether the survivor has been referred to a support service provider.

The GRM does not record any other data that could identify the survivor. SEA/SH records are kept in a separate, access-restricted section of the GRM register.

In accordance with World Bank requirements, the GRM refers the survivor to appropriate support services immediately upon receipt of the report. Prior to the launch of the Task, the PIU identifies available local support services as a part of the GRM. This list is updated throughout the implementation of the Task.

Every Contractor adopts a Code of Conduct expressly prohibiting SEA/SH as a condition of the contract. Before works commence, all Contractor personnel complete mandatory SEA/SH training. Completion of this training is verified by the PIU prior to the commencement of works, on the basis of attendance records or training certificates provided by the Contractor; the PIU informs the PCU accordingly.

Indicators relating to SEA/SH reports are reported separately to the PCU and the World Bank. Data reported externally are anonymized and aggregated. SEA/SH indicators are not disclosed publicly.

10.9 GRM monitoring and reporting

Every GRM maintains a centralized register of all grievances, containing the data necessary to monitor their status and the timeliness of their resolution. The register covers all grievances, regardless of whether they are handled through the GRM or by external authorities. The PCU works with the PIUs to maintain a centralized case management system across Task-level GRMs, with standardized data fields, grievance and stakeholder interaction classification categories, and aligned reporting timelines, to support consistent monitoring and aggregate reporting at the Project level. The system is progressively implemented as Tasks commence and is maintained and refined throughout Project implementation as the number and scope of active Tasks evolve.

Complainants' personal data are processed in accordance with data protection legislation. The register of SEA/SH reports is kept in a separate, access-restricted section of the register, apart from other grievances. Data in the register are retained until completion of the Task and finalization of its accounts.

Every GRM is subject to regular monitoring using quantitative and qualitative indicators set out in the SEP. SEA/SH indicators are monitored separately. The PIU regularly verifies whether reporting channels are adequate, effective, and easily accessible to persons affected by the Project and to vulnerable groups. In accordance with ESS10 requirements, the PIU analyzes data from the GRM register in order to improve the Project's environmental and social performance and reduce the risk of recurring issues.

The GRM Coordinator prepares regular internal reports on the functioning of the GRM and submits them to the PCU. The PCU consolidates data from all GRMs and submits it to the World Bank.

In accordance with ESS10 requirements, the PIU makes anonymized data on grievances and the actions taken publicly available as part of its regular reporting on stakeholder meetings and consultations. SEA/SH indicators are reported separately to the PCU and the World Bank and are not disclosed publicly.

The results of GRM monitoring are taken into account in updates to the SEF. Where systemic shortcomings in the functioning of the GRM are identified, the PIU implements corrective actions.

11 Monitoring and reporting

11.1 Stakeholder engagement monitoring indicators

Monitoring of SEP implementation is carried out by the PIU on an ongoing basis throughout the entire Task implementation cycle, based on the verification of documentation generated in the course of stakeholder engagement activities.

The PIU uses three core monitoring tools. The first is documentation of meetings and consultations – every stakeholder engagement activity is documented in the form of minutes, notes, or attendance lists, serving as the primary evidence of schedule implementation.

The second is the GRM register, which functions as the central database covering all grievances relating to the Task, together with information on the status of their resolution.

The third is monitoring of the Project's information channels, involving periodic verification of the availability and currency of information on the Project website and in the Public Information Bulletin (BIP), as well as analysis of the reach of media communications.

The effectiveness of SEP implementation is assessed using indicators focused on measurable aspects of process implementation and stakeholder management.

Quantitative (output) indicators:

- compliance with the schedule of planned communication activities;
- timeliness of consultation notifications;
- number of consultation meetings held and number of participants;
- number of stakeholder engagement activities by Project implementation stage;
- number of GRM grievances by category, status of resolution, and number of grievances escalated;
- GRM effectiveness: number of grievances resolved and closed within the deadline; adequacy of resourcing, staff awareness, and clarity of applicable procedures;
- completeness of documentation from activities carried out – minutes and attendance lists (target: 100%).

Qualitative (outcome) indicators:

- stakeholder satisfaction with the response received to grievances and comments raised, assessed through periodic feedback or surveys.

11.2 Reporting schedule and format

The Consultant prepares regular reports on SEP implementation for the given Task and submits them to the PIU. The reports include: a list of stakeholder engagement activities carried out during the reporting period, a summary of key issues raised by stakeholders and the actions taken in response, the status of monitoring indicators, and a summary of GRM grievances. The frequency and format of internal reporting are set out in the SEP in accordance with the scale and stage of implementation of the Task.

Data on stakeholder engagement and the GRM are incorporated into Project implementation reports. These reports include cumulative indicator values, a summary of key stakeholder concerns and the actions taken, and aggregated GRM data.

The SEF is updated where the adopted engagement methods prove ineffective, at formal transitions between stages of Project implementation, or where a change in Project scope results in the inclusion of new areas or stakeholder groups.

12 Appendixes

12.1 Appendix 1 – Grievance form

GRIEVANCE FORM
Important information: • Procedure is free of charge. • Complaint can be filed anonymously • You will not suffer any negative consequences • If you provide your contact details, we will respond to your complaint.
TO BE FILLED OUT BY THE PROJECT OFFICE *Date of receipt:* *Case no.:*
Submitting party's details:
☐ I am notifying ANONYMOUSLY – do not fill in below, proceed to "CONTENT OF THE COMPLAINT"
☐ I am providing the details Name and surname: ..... Address: ..... Telephone: ..... E-mail: ..... ☐ I consent to process my personal data to consider the complaint by the State Water Holding Polish Waters, Regional Water Management Authority in ..... How should we contact you? ☐ Telephone ☐ E-mail ☐ Post ☐ In person ☐ I do not expect a reply
Describe what happened and what the problem is:
Appendix: GDPR clause

12.2 SEP outline

This Annex sets out the required structure and minimum content of the Stakeholder Engagement Plan (SEP) to be developed for each Task under the Project.

All work on the SEP is coordinated with the Project Coordination Unit (PCU). The PCU has experience in implementing flood protection projects in Poland financed by the World Bank, as well as familiarity with World Bank procedures. The PCU operates within the structures of the State Water Management Holding "Polish Waters".

The PCU manages the tasks of the Project Implementation Units in relation to the implementation of Tasks under the Project. It provides technical assistance to the PIUs, supports preparatory work, and oversees and assesses the progress of work under the Project. The PCU also acts as coordinator for the notification of the SEF to the World Bank.

The PIUs are responsible for carrying out the tasks involved in preparing the SEP, including in particular:

- preparing the entire stakeholder engagement process, including the SEP;
- identifying stakeholders and analyzing their information and participation needs;
- organizing and conducting public consultations;
- implementing and operating the Grievance Redress Mechanism (GRM);
- monitoring implementation progress and preparing reports for monitoring purposes;
- coordinating the work of all services involved in the preparation and implementation of the SEP.

In preparing and implementing the SEP, the PIU is supported by a Consultant selected in accordance with World Bank procedures. The Consultant supports the PIU at all stages of the work – from the preparation of the SEP through to its completion and closure.

The SEP for a Task must include, at a minimum, the following elements.

1. List of abbreviations and glossary

A list of abbreviations used in the document and a glossary of key concepts and terms.

2. Introduction

A description of the Task – location, physical scope, stage of preparation and implementation, and relationship to the Project. The legal basis and standards governing stakeholder engagement, including the World Bank's ESS10 requirements and Polish law.

3. Objectives of the SEP

A description of the operational objectives of stakeholder engagement for the given Task. A statement of the principles governing the conduct of stakeholder engagement.

4. Stakeholder identification and analysis

4.1 Methodology

A description of the method used to identify and analyze stakeholders for the Task.

4.2 Project-Affected Persons (PAPs)

Identification of PAPs, divided into at least two subgroups: persons affected by property acquisition and other persons affected by the negative impacts of the Task.

4.3 Other interested stakeholders

Identification of other interested stakeholders, divided into subgroups relevant to the given Task – covering at least: public administration authorities at the municipal and county level, public administration authorities at the voivodeship and national level, managers of technical infrastructure, non-governmental and civil society organizations, and the media.

4.4 Vulnerable groups

Identification of vulnerable groups and individuals particularly at risk of exclusion from the consultation process, with a description of the main barriers to accessing information and participating in the decision-making process.

5. Stakeholder engagement program

5.1 Summary of activities carried out during SEP preparation

A summary of stakeholder engagement activities carried out prior to the adoption of the SEP – in the form of a table containing at least: type of activity, date, location, participants, key issues raised, and how they were addressed.

5.2 Methods, tools, and engagement schedule

A stakeholder engagement table covering all stages of Task implementation (design, construction, operation), broken down by: implementation stage, target groups, consultation topic or message, engagement method, responsibility, and frequency or schedule.

For dam-safety and reservoir-related tasks, this section must cover consultation with downstream riparian communities to validate the EPP assumptions and gather local data on historical floods, runoff paths, vulnerable facilities, mobility constraints, and evacuation feasibility.*5.3 Strategy for incorporating the views of vulnerable groups*

A description of measures tailored to the needs and barriers of each identified vulnerable group, ensuring their full and meaningful participation in the consultation process.

6. Responsibility for stakeholder engagement implementation

A description of the structure for implementing stakeholder engagement for the Task. A description of the role of all entities involved in communication activities, including the authorities of municipalities affected by the Task.

7. Grievance Redress Mechanism (GRM)

- Confirmation that the GRM for the Task meets the minimum requirements set out in Chapter 9 of this SEF.
- A description of the substantive scope of the GRM for the given Task.
- Identification, by name or by function, of the GRM Coordinator, the composition of the GRM Committee, and the designated SEA/SH focal point. A description of the responsibilities of each of these roles.

- A list of all channels for receiving grievances, with contact details. The location and operating hours of physical intake points. A description of arrangements tailored to the needs of vulnerable groups.
- A table of binding resolution timeframes, covering: the deadline for registration and acknowledgment of receipt, resolution deadlines for the expedited, standard, and complex tracks, and the deadline for issuing a decision following a request for reconsideration.
- A description of the steps in the grievance-handling procedure, covering at least: receipt and registration of the grievance, assessment and classification, substantive resolution or referral to an external authority, communication of the outcome to the complainant, case closure, and the appeals process.
- A description of the dedicated SEA/SH procedure, covering: a list of local support services with contact details, modified registration requirements, the procedure for referring the survivor to support services, and the method for reporting SEA/SH indicators.
- A description of how information on the GRM is made public – channels, format, publication timing, and update procedures.
- A description of GRM monitoring indicators and the reporting schedule.

8. Monitoring and reporting

A description of the tools used to monitor SEP implementation for the Task, monitoring indicators, and the reporting schedule and format. A description of the grounds for updating the SEP.