

Delivering Resilient Infrastructure in Vulnerable Environments in Ukraine ("DRIVE")

Ministry for Development of Communities and Territories of Ukraine

State Agency for Restoration and Development of Infrastructure of Ukraine

RESETTLEMENT POLICY FRAMEWORK

This document may need to be updated from time to time, based on legal framework change, project scope and other changes that lead to changes in RAP requirements

February 2025

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RPF	-	Resettlement Policy Framework
MDCT		Ministry for Development of Communities and Territories of Ukraine
AR	-	State Agency for Restoration and Development of Infrastructure of Ukraine
IBRD	-	International Bank for Reconstruction and Development
ESS	-	Environmental and social standard
PAP	-	Project affected person
RAP	-	Resettlement Actions Plan
GRM	-	Grievance Redress Mechanism
PIU	-	Project implementation unit
IA	-	Implementation agency
PBCs	-	Performance-Based Conditions
IDA	-	International Development Association
URTF	-	Ukraine Relief, Recovery, Reconstruction And Reform Multi-Donor Trust Fund
SPUR	-	Special Program For Ukraine And Moldova Recovery
EU	-	European Union
IFC	-	International Finance Corporation
LPA	-	Local public administration

Abbreviations

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1. Introduction

1.1 Background

The Government of Ukraine, through the Ministry for Development of Communities and Territories of Ukraine (MDCT) and State Agency for Restoration and Development of Infrastructure of Ukraine (AR), will implement the project Delivering Resilient Infrastructure in Vulnerable Environments in Ukraine (“DRIVE”) (Project), financed by the International Bank for Reconstruction and Development (IBRD) and the Special Program For Ukraine And Moldova Recovery (SPUR) of the International Development Association (IDA) crisis facility and the Ukraine Relief, Recovery, Reconstruction And Reform Multi-Donor Trust Fund (URTF). The Project will be implemented by the MDCT and AR. The Resettlement Policy Framework (RPF) will be implemented by the MDCT and AR in case if additional land acquisition will be needed or in case if Project activities will lead to physical and economical displacement.

1.2 Components description

Component 1: National Road Network Routine Preservation (US\$360 million IBRD/IDA)

Subcomponent 1.1, Investments for National Roads (US\$270 million IBRD/IDA) finances the design, execution and supervision works for road preservation on the national network of Ukraine. The scope of financing covers about 50 roadworks contracts, ranging from 130 to 1,700 km each, aiming at highway preservation, maintenance and repairs. These contracts have been already awarded by AR and are under implementation or already been implemented. The cost of this contracts will be compensated by the Project to the State budget as retroactive financing. Roadworks activities under selected contracts are undertaken across the Government-controlled territory of Ukraine – around 18 regions (oblasts). The Kyivska, Chernihivska, Kharkivska and Odeska oblasts, strongly impacted by destruction, concentrate around half the Project activities. The land acquisition needs will be defined during ES audit during preparation stage and those contracts which will require land acquisition will be eliminated from the Project as not eligible for compensation.

These contracts aim at keeping roads and bridges in good operational condition, ensuring that road safety elements are in place and that roads are more resilient to extreme climate events, such as flooding and weather-related stress. Climate-adaptive features include enhanced drainage systems, slope stabilization, and the use of weather-resistant materials to prolong road lifespan. In total, roadworks under selected contracts cover an extension of about 14,800 km and include the following types of activities:

(a) **Operational maintenance:** Operational road maintenance includes activities aimed at ensuring the safety, functionality, longevity and climate resilience of road infrastructure following the build back better principles. Based on national standards, key types of works involved in routine road maintenance in Ukraine are the following: (i) maintenance and protection of embankments, preventing landslides and erosions due to heavy rainfalls; (ii) maintenance and, as required by increasing waterflows, widening of longitudinal drainage systems, (iii) pavement and road surface maintenance, including cracks sealing and potholes patching, resulting from traffic loads and heatwaves; (iv) routine maintenance of bridges and culverts; (v) replacement/repair of roadside safety equipment; (vi) winter maintenance, (vii) preparation for seasonal floods and ice flows, and (viii) emergency response, in case of traffic accident, landslides, or other natural or climate disasters.

(b) **Bridge capital repair:** Bridges capital repairs encompass a set of works aimed at restoring and improving the structural integrity and functionality of bridge elements and making them

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more resilient to climate events. These repairs ensure the safety, reliability, and longevity of bridges, particularly in response to increased traffic loads, wear and tear, damage, and non-conventional floods. The scope of works includes: (i) strengthening and widening of bridges, (ii) replacement of critical structural elements, (iii) construction of protective structures for piers and abutments, (iv) protection of riverbanks with nature-based solutions; (v) installation of accessibility infrastructure, and (vi) replacement, installation and widening of drainage systems to address rain stronger episodes.

(c) **Road capital repairs:** Similar to bridge repairs, capital repair activities for roads are also carried out either using pre-developed design documentation or through "design and build" contracts. In both approaches, the scope of work, Bills of Quantities, and costs are defined by the project documentation and are subject to review by the relevant expertise authorities. The scope of works includes: (i) strengthening, resurfacing and reconstruction of road pavements, using higher density bitumen to increase resilience to high temperature in periods of heatwaves; (ii) upgrading drainage systems, factoring increased quantity and frequency of heavy rainfalls; (iv) construction of additional traffic lanes and road features, (v) modernization of road safety equipment and features, and (vi) restoring and protecting earthworks and road embankments against erosion and landslides.

Subcomponent 1.2, *Reforms for National Roads and Road-based Transport (US\$90 million IBRD/ IDA)* enables the transport sector operational efficiency with a result-based approach. The disbursement of Subcomponent 1.2 funds is conditional on defined PBCs having been met. Selected PBCs support key areas of reform and institutional strengthening of the road sector, aiming not only at further sustainability of the Subcomponent 1.1 investments but also to supporting vital road-based transport services. Operational efficiency is covered through the three complementary Pillars described below¹.

Pillar 1: Improving road infrastructure management following the build back better approach. Pillar 1 aims to strengthen the quality delivery of state road infrastructure considering build back better approach to ensure climate resilience of road infrastructure based on climate vulnerability context.

(a) PBC1 supports setting up new roadworks contracts templates abiding by international best practice and specifying specific road construction requirements based on climate vulnerability context to increase road infrastructure resilience to climate change. With more standardized contracts, this action is expected to increase the predictability of contract execution, transfer a greater part of contract risks to private contractors and provide clearer contract conditions for foreign contractors to participate in Ukraine's road construction market. US\$12 million are allocated to this PBC.

(b) PBC2 supports setting up new standards for roadside protection barriers, aligning Ukraine's regulations with EU norms and factoring in best technology practice. This action is expected to reduce the severity of road crashes and improve road safety. US\$12 million are allocated to this PBC.

Pillar 2: Developing private sector participation and enabling private capital. This Pillar supports creating missing regulations to enable private sector participation in road infrastructure and road-based transport services. They are aligned with the IFC engagement in Ukraine and support Private Capital Enabling.

¹ The expenditure base of Subcomponent 1.2 is the same as the Subcomponent 1.1 one, the about 50 roadworks contracts with a total Bank financing over Component 1 of US\$360 million.

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(a) PBC3 supports setting up a new regulatory framework to charge Heavy Good Vehicles (HGVs) for using state roads. In line with user-pay principles and EU practice, this action is expected to increase the private sector participation in road infrastructure management, as well as consolidate revenues from users to maintain road infrastructure. Additionally, this action also contributes to climate change mitigation by incentivizing modal shift to cleaner modes of transport (railway, waterborne transport). US\$20 million are allocated to this PBC.

Pillar 3: Digitalizing road-based transport services. This Pillar supports creating missing regulatory and institutional elements to increase the operational efficiency of transport systems.

(a) PBC4 supports the digitalization of the tendering procedure for road-based interregional passengers transport services. This action is expected to make more transparent and facilitate the award of public transport licenses, as well as reduce corruption. Digitalizing the tendering procedure would streamline process accelerates contract awards, minimizes delays, and enables, encouraging the modernization of fleets, enhancing public transport service quality. These improvements could encourage a modal shift from private vehicles to public transport, reducing road congestion and contributing to lower greenhouse gas emissions and energy consumption. Ultimately, this action also contributes to climate change mitigation by promoting better public transport services. US\$10 million are allocated to this PBC.

(b) PBC5 supports scaling-up the eCherga (e-queuing) digital tool. eCherga is an online slot booking system to facilitate border crossing for cargo trucks and passenger buses. Sixteen border crossing points already support eCherga for trucks and PBC6 will expand the system to 12 additional border check points for trucks. This action is expected to reduce congestion reduces the time vehicles spend idling at border crossing points, increasing energy efficiency through fuel savings² and decreases GHG and particulate matter emissions, contributing to improved air quality and climate change mitigation. eCherga will also curb corruption opportunities by minimizing interaction between checkpoints officials and drivers. US\$36 million are allocated to this PBC.

Component 2: National Road Network Periodic Preservation (US\$39 million IBRD/IDA)

Subcomponent 2.1, *Installation of emergency modular road bridges (US\$3 million)*, aims at restoring connectivity where road bridges have been damaged or destroyed. These modular bridges incorporate climate-resilient designs addressing more frequent and intense flooding due to higher precipitation levels caused by climate change. This subcomponent finances the design and works for the installation of 15 modular emergency bridges on national roads; the supply, but not the installation, of these modular road bridges were carried out through the RELINC Project.

Subcomponent 2.2, *Climate-smart preservation of key network links (US\$36 million)* finances the capital repair of selected road sections to access Border Crossing Points (BCPs) aiming at enhancing their climate resilience. Specific climate vulnerability assessment will be undertaken for the designated sections. Designs will be informed by these assessments and will incorporate the required additional climate resilience measures. Subcomponent 2.2 will finance the engineering designs, construction, and quality assurance of related road infrastructure. All interventions will be conducted in close coordination with the relevant Development Partners, in particular the European Union. Interventions will be located within the territory of Ukraine.

Component 3: Technical assistance and Project management (US\$10 million URTF Grant)

Subcomponent 3.1, *Technical assistance and projects designs (US\$9 million)* complements the investment-focused components. Subcomponent 3.1 finances engineering designs for state

² Idling can consume up to 0.8 gallons of fuel per hour for heavy-duty trucks. Gaines, L, Levinson, T, and "Idling - cruising the fuel inefficiency highway," (2011), <https://doi.org/10.2172/1021324>

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road repairs, as well as technical assistance activities. This includes predictive modeling of climate impacts, capacity building for climate-smart infrastructure planning, and gender-responsive climate engineering training programs. This Subcomponent is forward-looking, aiming at both reconstruction investment (engineering designs and project documentation) and supporting the Project implementation of activities (technical assistance to strengthen the road sector).

On engineering designs, Subcomponent 3.1 finances the engineering designs and project documentation of about 350 km of road sections of key export corridors, including the M-06 state road, connecting the Kyiv region to the border with Poland. This is a strategic corridor connecting the capital city to the European Union, also serving major cities – Zhytomyr, Rivne and Lviv. The specific road sections will be selected based on: (i) specific climate vulnerability assessments; and (ii) cost-benefit analyses of proposed investments. These engineering designs will feature capital repairs or reconstruction. The designs will include the necessary road safety and climate resilience elements, so that repaired roads are both safer to users and more resilient to adverse climate events.

On technical assistance, Subcomponent 3.1 finances three activities: (i) Consulting services and training for the institutional strengthening of AR regional divisions. Within AR decentralization process, regional divisions are taking an increasing role and autonomy in road management; based on the conclusions of a USAID assessment of AR governance, this activity will focus on roadworks supervision and management. (ii) Consulting services to support AR and MDCT in developing the required analytical work to achieve agreed PBCs, with a focus on climate-resilient infrastructure standards and adaptive management systems. (iii) Consulting services for a feasibility assessment to amend the procurement legislation related to standard agreements for public roadworks to make them more gender-responsive. Procurement legislation presents a valuable opportunity to promote women's employment and entrepreneurship in road construction by influencing bidder selection and award criteria.

Subcomponent 3.2, Project Management (US\$1 million), finances eligible expenses to support Project implementation. This includes external consultancy expertise to support Project implementation and operating costs like office equipment, travel, printing and translation costs. The Project will be implemented by the AR employees, and they may benefit from capacity building and selected additional expert support in procurement, financial management, environmental and social risks management and annual program planning. This subcomponent will also finance the Project audits and the independent verification of PBCs.

Fostering the gender agenda in the transportation sector, Subcomponent 3.2 will also finance three to six-month paid internships to female students in their final year and recent graduates within the MDCT and AR. The MDCT will collaborate with educational institutions specializing in transport and construction to identify women with relevant engineering degrees who are interested in the internship program. The MDCT will design the internship program to include both theoretical and practical fieldwork. Each intern will be paired with a mentor to provide guidance and support throughout the program. Interns will receive a certificate upon completion, detailing the duration and scope of their fulfilled work.

2. Objective and key principles of drafting the RPF document

At the stage of the Project preparation, the scope of potential land acquisition, physical and/or economic displacement, restrictions of access is yet to be identified and will be reassessed after technical projects preparation and approval by expertise. Therefore, this Resettlement Policy Framework (RPF) was prepared to provide guidance on managing possible economic and

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physical displacement resulting from land acquisition for project activities if any. An RPF has been prepared by AR in cooperation with MDCT at Project preparation stage as part of the Borrower's commitments mentioned in ESCP and to complete conditions for Project effectiveness. This RPF provides policies and procedures to minimize social risks associated with the detailed designs of road sections, bridges, Border Control Points etc. If technical designs and feasibility studies provide sufficient details and site-specific information of the investments, preliminary/initial RAPs will be prepared, approved, and implemented in line with the RPF, and prior to works starting. The RPF also takes into account the needs of project-affected persons and is drafted in accordance with the Environmental and Social Framework (ESF) and its social and environmental standards of IBRD (ESS5)³ and the Ukrainian legislation.

This document may be updated if stakeholders provide substantive suggestions, if significant change in scope of the Project Road design, construction or operation, changes or amendments to the applicable laws and policies are made or significant resettlement issues arise. The final version of the RPF will be published on the official websites of MDCT and AR as well as on the official information resources (if any) of the relevant LPA where the Project will be implemented.

In accordance with the Bank's ESS5 standards, Ukrainian legislation and best practices for resettlement activities, the following principles will be followed by the implementing parties (MDCT and AR) during the planning phase:

- (i) If it is identified that it is necessary to acquire privately owned land or other assets, the implementing parties will develop a Resettlement Action Plan in accordance with the requirements of the Bank's ESS5 standards and national legislation, which will contain a complete register of persons adversely affected by the Project, set up a cut-off date ⁴ and contain a comprehensive description of mitigation measures aimed at minimizing the adverse impact of the Project;
- (ii) During project design elaboration, implementing entities and the design agency takes comprehensive measures to minimize the acquisition of assets and the resettlement of individuals within the framework of the project implementation. This task achieved through optimizing design solutions and giving acquisition priority to the assets, which are in state or communities ownership.
- (iii) The preparation and implementation of Resettlement Action Plans will be carried out in a transparent manner and by involving the project-affected persons through consultations and disclosing the related documents in publicly available sources.
- (iv) The main principle of the resettlement process will pursue saving of the living conditions of the PAPs at least to those levels existing prior to the start of the Project.
- (v) The PAPs will not incur any material losses when being paid compensation for expropriated assets, re-registering the respective rights in favour of the local authorities and during implementation of resettlement arrangements.
- (vi) The compensation for expropriated assets will be fully paid to the PAPs, with allowances made for the respective investments. Determination of the compensation amount will be carried out exclusively by licensed assessment entities in accordance with the methodologies approved by regulatory acts in Ukraine. The transaction and relocation costs will be evaluated by regional services for restoration (regional branches of AR) and will be added to

³ <http://pubdocs.worldbank.org/en/796881511809516397/ESS5-FactSheet-WB-ESF.pdf>

⁴ Cut-off date – the date on which the census for identification of the project-affected individuals is finished and disclosed to the public, and their eligibility for compensation is documented. In the event that the right to assets was acquired after the cut-off date had been set and publicly disclosed, such assets shall not be eligible for compensation.

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full compensation package. No project-related works will commence until full compensation has been provided to the PAPs.

(vii) the provisions of this document extend to all PAPs, regardless of their number and the degree of impact.

(viii) when elaborating and implementing the RAP, particular attention will be paid to the needs of vulnerable groups, women and minorities, people who lives below the poverty line, ethnic minorities and displaced persons. The vulnerable PAP's will be identified and their special needs will be assessed during RAP preparation.

3. RAP drafting and approval

The Resettlement Action Plan will be developed after the project design is approved by the State Expertise and the Cabinet of Ministers of Ukraine (if required). For example, with regard to impacts of Component 2: National Road Network Periodic Preservation, after approval of design decisions, the AR will engage certified land management authorities to delineate the Project boundaries and obtain a detailed list of land plots and other assets that fall within the area of civil works and require acquisition (their type and persons adversely affected by the Project, including owners, tenants and users of assets).

The purpose of the Resettlement Action Plan will be to verify the list of persons adversely affected by the Project (including tenants and informal users of assets), determine the type and amount of compensation for loss of assets/income sources in order to maintain the living standards/income of all PAPs.

RAP will have the following structure:

- (i) General description of the Project for which a specific RAP applies, description of the objectives of RAP preparation
- (ii) Information on the potential impacts (both positive and negative) that were identified during RAP preparation
 - a description of the impacts that will directly or indirectly affect the need for assets alienation;
 - a description of the location of impacts;
 - a description of the alternatives having been assessed to minimize the alienation of assets;
- (iii) Disclosure of the results of socio-economic research, which is a necessary procedure in RAP preparation
 - a description of the census to record the PAPs, including the assets subjected to acquisition
 - characteristics of the project-affected households, including employment, living standards, income level, economic and social activity of household members, access to social infrastructure, information on vulnerable groups.
 - A livelihood assessment to evaluate the potential economic impact of displacement on PAPs. If livelihood restoration measures are required, they will be included in the RAP, in accordance with the provisions of ESS5. All livelihood restoration measures will be designed and implemented in consultation with PAPs to ensure that they align with their economic and social needs.
- (iv) A review of the Ukrainian legislation and Lender's requirements regarding organisational arrangements guiding the acquisition of assets for public purpose;
- (v) Institutional framework. A review of the stakeholders involved in the Project implementation, including their responsibilities;
- (vi) Rights Matrix (eligibility). Identification of the groups that might be adversely affected by the project implementation and types of envisaged compensation and livelihood restoration measures.

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- (vii) Description of the Methodology for assessing the loss of assets depending on the nature of losses;
- (viii) Description of resettlement measures that will be envisaged to provide appropriate assistance to ensure that the resettlement process is in line with IBRD requirements and standards;
- (ix) Description of the measures aimed at involving communities in RAP implementation, including a grievance mechanism;
- (x) Timetable for RAP implementation;
- (xi) Indicative budget;
- (xii) Arrangements for RAP implementation monitoring.

During the preparation of the RAP, a series of public consultations will be organized in the settlements that will be adversely affected by the Project and will have resettlement issues. Information about the public consultations will be disseminated in local media, local authorities and public places. During the consultations, all stakeholders will be informed about the Project objectives, RAP objectives and its content in clear non-technical terms and in a language understandable to the stakeholders. Additionally, stakeholders will be informed about the cut-off date, which establishes the eligibility for compensation and resettlement assistance. Any individuals or claims that arise after this date will not be eligible for compensation under the RAP. The developed RAP will be published on the official websites of the MDCT and AR. The hard copies of RAP will be available in each community which affected by the Project.

Once the RAP is approved by the IBRD, it will be published on the official websites of the Bank and the MDCT and AR in Ukrainian and English.

4. Potential impacts

The following potential negative impacts were identified during the preparation of this RPF:

- Permanent loss of private agricultural and residential land and assets by persons who has a title deeds;
- Permanent loss of private agricultural and residential land and structures by persons who has no title deeds (informal users and squatters);
- Temporary loss of land;
- Loss of annual and perennial crops and trees;
- Loss of non-residential structures (fences, barns, sheds) and infrastructure (irrigation or other utilities).
- Loss of business structures (shops, places for trade along the road, workshops, fuel stations, tire-mounting stations, etc.)
- Loss of residential houses (physical displacement);
- Loss of sources of livelihood (economical displacement);
- Temporary or permanent loss of access to public infrastructure;
- Temporary or permanent loss of access to private land or structures;
- Temporary or permanent loss or limitation of access to business along the road.

The presence and intensity of this impacts for subproject will be assessed during RAP preparation, where design documentation will be approved.

In case if impact will be identified, the mitigation measures will be taken according to the entitlement matrix.

5. Categories of PAPs and the rights matrix entitling compensation

Eligible project-affected individuals may be classified as follows:

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- (i) persons who have formal legal rights to the land or fixed assets;
- (ii) persons who do not have formal legal rights to land at the time of the census of project-affected individuals, but claim to it and declared accordingly, provided that such claims are recognized under the national law;
- (iii) persons who have the old type of land ownership documents and are not registered in the state land cadastre;
- (iv) persons who do not have formal legal rights to the land or other assets, but use them;

The persons belonging to the first three categories (i), (ii) and (iii) will be paid compensation for the expropriated assets and, as necessary, will get assistance during resettlement. The persons belonging to the fourth category (iv) will get assistance during resettlement, which may include financial or in-kind support for securing alternative accommodation. In the event that the representatives of all the above listed categories grow agricultural crops on the land plots required to be expropriated for the purposes of the Project, such persons will be given the opportunity to harvest or receive the respective compensation. In case if informal users of residential assets need to be resettled, the adequate alternative housing with security of tenure will be provided. PAPs who belongs to vulnerable and disadvantaged groups will be identified during RAPs preparation and their needs will be noted.

A comprehensive matrix of property rights for compensation is presented in Table 2

Table 2. Matrix of rights (to compensation)

Type of impact	Category of PAP	Type of compensation
Permanent losses		
Permanent loss of agricultural and residential land	Owner of land	<ul style="list-style-type: none"> - Monetary compensation for loss of land, which is the market value of land (all administrative charges for lots division and title fees are covered by project costs) - Land-for-land compensation, equivalent in area and fertile characteristics (if suitable land is available). - In case where the part of land plot will be acquired and the rest of land plot cannot be used rationally according to land purpose, upon request of land owner, whole land plot should to be acquired;
	Formal users (tenant) of land	<ul style="list-style-type: none"> - The tenants will be preliminarily notified (1 agricultural season before acquisition) of the project implementation to avoid loss of harvest or modernization losses and leasing payments for acquired land. The lease agreements will be amended in accordance with the law to indicate the land areas to be expropriated for the purposes of the project. - The user will be given an opportunity to harvest the crop or compensation for the crop will be provided.
	Informal users of land	<ul style="list-style-type: none"> - Assistance to identify replacement land/resources for use prior to land entry. - The informal users will be given an opportunity to harvest the crop or compensation for the crop will be provided.

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Permanent loss of structures or residential houses	Owner of structures or residential house	<ul style="list-style-type: none"> - Monetary compensation for loss of immovable structures including all adjacent facilities (fruit trees, outbuildings, etc.); - Compensation by providing a house to replace the affected house, at least equivalent in size and current status, including residential land at least equivalent to the advantages of the land taken (if suitable building is available). - Assistance to move; - If no reasonable alternative access can be provided and a owner of structures and residential land will permanently lose the access to the social infrastructure (access to the road, to the communal facilities, to the municipal infrastructure, etc) the owner will be resettled or his assets will be acquired.
	Formal user (tenant) of land	<ul style="list-style-type: none"> - Information about the acquisition of the house at least six months in advance of demolition to enable the tenant to find other accommodation - Assistance to move;
	Informal users of structures	<ul style="list-style-type: none"> - In case if people occupied the land and structures prior of the cut-off date, the compensation will cover structures loses and expenses for land improvement. In addition, resettlement assistance will be provided. - In case if informal users of residential assets need to be resettled, the adequate alternative housing with security of tenure will be provided
Loss of one-year crop	Land owner, land user, informal user	<ul style="list-style-type: none"> - The crop owners will be given a possibility to harvest. When conducting public consultations in the RAP preparation stage, the owners will be notified of the planned activity and recommended to abandon sowing of the land plots required for the project needs. - In case when the opportunity to harvest the crop was not ensured, the crop owners will be paid compensation. The methodology of calculating the compensation for lost crop will be presented in RAP. In case when owners of the crop was notified about civil works in advance but planted the crop, the compensation for crop loses will not provided.
Loss of perennial plants		The owners will be paid compensation for loss of perennial plants based on their age and value, including the costs for the restoration of plantings. The methodology of calculating the compensation for lost perennial plants will be presented in RAP.
Loss of non-residential structures	Owner of non-residential structure and infrastructure (which could be the landowner or formal or informal user of land)	Cash compensation at full replacement cost

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Loss of business structures (shops, places for trade along the road, workshops, fuel stations, tire-mounting stations, etc.)	Owners of business structures	<ul style="list-style-type: none"> - Cash compensation at full replacement cost or replacement of business structure. - The owners of business will be notified in advance (no later than 6 months before acquisition) for ensuring the opportunity to find a new location for business.
	Tenants of business structure	<p>Information about the acquisition of the business structure at least six months in advance of demolition to enable the tenant to find other premises</p> <ul style="list-style-type: none"> - The tenant of structure for business will be notified in advance (no later than 6 months before acquisition) for ensuring the opportunity to find a new location for business.
	Informal business structures along the road	<ul style="list-style-type: none"> - The users will be offered a mechanism for the use of land plots to do business legally in other territories. If necessary, in line with lenders requirements, assistance will be provided for business relocation. These users will be able to get an assistance for removal to the other place - The owner of informal structure for business will be notified in advance (no later than 6 months before acquisition) for ensuring the opportunity to find a new location for business
Public administrations	Lands of state or municipal property	The land will be transferred to the permanent use of Road Services without any compensation
Temporary losses		
Temporary loss of land	Owner	<ul style="list-style-type: none"> - Cash compensation at full replacement cost for the right to use land under contract, for the land use period; - Reinstatement of land after use. - The crop owners will be notified in advance will be given a possibility to harvest.
	Tenant	<ul style="list-style-type: none"> - The user will be given an opportunity to harvest the crop. In other case the compensation for the crop will be provided. - Assistance to identify replacement land/resources for use prior to land entry.
	Informal user	<ul style="list-style-type: none"> - Assistance to identify replacement land/resources for use prior to land entry.
Temporary or permanent loss of access to public infrastructure (hayfields, pastures, recreation areas, etc.)		Creating alternative access routes to these facilities

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Public utilities		Rehabilitation/replacement of affected structures/utilities to pre-Project state.
Community structures and assets	Affected communities	Rehabilitation/replacement of affected structures/utilities to pre-Project state.
Loss of livelihood	Local population, local business	The livelihood restoration measures will be taken according IBRD requirements to the preproject level. In case if loss of livelihood will be identified during RAP preparation, the restoration action plan will be developed according to the livelihood restoration strategy. The livelihood restoration strategy described in Section 9.
PAPs with vulnerabilities, including economically disadvantaged individuals, elderly individuals without family support, persons with disabilities that limit their ability to secure housing or livelihoods, women-headed households, ethnic minorities, displaced persons, and households with multiple dependents.	Land and structures owners/tenants/informal users	The RAP will define vulnerability criteria and identify affected vulnerable persons. Identified PAPs with vulnerabilities will receive additional assistance (assistance in registration of title deeds, searching alternative location for business, moving assistance, etc).

6. Legal framework applicable to alienation of assets and resettlement

National legislation

Privately owned land is alienated in accordance with the following legal framework:

- The Constitution of Ukraine (Articles 13, 14, 41) provides that "no one shall be unlawfully deprived of the right to property. The right to private property shall be inviolable" and "The expropriation of private property may be applied only as an exception for reasons of social necessity, on the basis and in accordance with the procedure established by law, and subject to prior and full compensation of their value. Compulsory alienation of such objects with subsequent full compensation of their value is allowed only in conditions of martial law or a state of emergency." (Article 41)
- The Law of Ukraine "On Alienation of Privately Owned Land Plots and Other Real Estate Located Thereon for Public Needs or for Reasons of Public Necessity" of 17.11.2009, No. 1559-VI
- Land Code of Ukraine (dated 25.10.2001 No. 2768-III) (in particular, Articles 143, 146, 147, 149-151)
- The Civil Code of Ukraine (dated January 16, 2003, No. 435-IV) establishes the procedure for termination of ownership of real estate through the acquisition or alienation of the land plot on which the property is located for reasons of public necessity; regulates issues related to the protection of property rights (Articles 350-351)
- The Code of Administrative Procedure of Ukraine (No. 2747-IV of 06.07.2005) establishes the procedure for conducting court proceedings related to the alienation of land plots for national needs
- The Law of Ukraine "On Regulation of Urban Development" of 17.02.2011 No. 3038- VI
- The Law of Ukraine "On Land Valuation" of 11.12.2003 No. 1378-IV
- Law of Ukraine of 21.05.1997 No. 280/97-BP "On Local Self-Government in Ukraine"
- Decree of the Cabinet of Ministers of Ukraine of 19.04.1993 No. 284 "On the Procedure for Determining and Compensating Damages to Land Owners and Land Users"
- Decree of the Cabinet of Ministers of Ukraine No. 1531 "On Expert Monetary Evaluation of Land Plots" dated 11.10.2002
- The Law of Ukraine "On the Valuation of Property, Property Rights and Professional Appraisal Activity in Ukraine" of 12.07.2001 No. 2658-III
- The Law of Ukraine "On the State Land Cadastre" of 07.07.2011 No. 3613-VI
- Order of the Ministry of Justice of Ukraine No. 296/5 dated February 22, 2012 "On Approval of the Procedure for Performing Notarial Acts by Notaries of Ukraine"

Compensation for the temporary use of land during construction is regulated by the following Resolutions of the Cabinet of Ministers:

- Decree of the Cabinet of Ministers of Ukraine No. 1051 dated October 17, 2012 "On Approval of the Procedure for Maintaining the State Land Cadastre" with Annex 54 "Normative Monetary Valuation of Agricultural Land Plots".
- "On the Procedure for Determining and Compensating Damages to Landowners and Land Users", adopted by the Decree of the Cabinet of Ministers of Ukraine of April 19, 1993, No. 284

Environmental and social standards and requirements of the IBRD

All projects funded by IBRD must comply with Bank's environment and social standards. From October 1, 2018 The Bank introduced a new set of standards under Environment and Social Framework. From social perspective, following World Bank environmental and social standards are applicable:

ESS1 Assessment and Management of Environmental and Social Risks and Impacts sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing (IPF), in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

ESS5 "Land acquisition, restrictions on land use and involuntary resettlement" is one of the most important standards guiding land acquisition and related resettlement / livelihood restoration issues during project implementation. The key principle of this standard - involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented. This standard covers situation where Project must compensate people for loss of land, assets, livelihood or standard of living. However, it will influence of owners, tenants and informal users of structures, which located on this land, their level of income and livelihood.

ESS 10 "Stakeholder Engagement and Information Disclosure" recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Urban transport and city development programs require systematic and intensive engagement of stakeholders to implement them effectively and successfully. There are a wide range of stakeholders to be consulted which may include political powerholders at city and national level, transport operators (both public and private), business and trade organizations, civil society organizations, and other public sector institutions who have large number of workforce commuting to the city for work. The Stakeholder engagement plan (SEP) will map project-affected persons and other interested parties, summarize their views on preferred modes of engagement throughout the project, propose stakeholder engagement activities with the respective implementation roles, timeline and budget to be carried out through the life of the project. The project will also require a robust communication and public outreach strategy to inform communities candidly about impacts as well as benefits as well as the schedule and scope of works so that residents can plan accordingly.

Gap analysis between national legislation and IBRD environmental and social standards

In Ukraine, entitlements for payment for the exchange of land are based on registration of ownership. However, under the IBRD involuntary resettlement standard, affected persons are entitled to some form of compensation whether or not they own a registered land title, if they occupy or use the land prior to the cut-off date. The focus of the IBRD standards is to mitigate the adverse impacts of poverty, where any adverse impacts occurring are directly or indirectly attributable to activities funded by the project. In cases where PAP have no ownership or tenure rights according to Ukrainian law due to lack of registration, the provisions of the Lender requirements will be applied in terms of their rights for compensation, consultation, and grievance mechanisms. Where there is a difference between the compensation requirements of the laws of Ukraine and IBRD requirements, the more beneficial to the affected people, will be employed in order for the Lender to support and fund the Project.

Table 4. Differences between Ukrainian legislation and IBRD requirements

Ukrainian Laws and Regulations	IBRD requirements	Gap Filling Measures
Only officially registered buildings are subject to compensation for damages / destruction caused by the project	All buildings are subject to compensation for damages / destruction caused by the project	The project will compensate all affected structures for damages/demolition caused by the project
Only officially registered land owners will be paid compensation for loss of profit / business caused by the project	Registered and non-registered tenants will be paid compensation for loss of profit / business caused by the project, regardless of registration.	The project will compensate all lease tenants (legal or informal) for income/business losses regardless of registration
There are no special provisions identifying the process of involuntary resettlement planning, as well as specific tools, including preparation of any plan pertaining to land expropriation and resettlement	Time-limited in terms of application, the resettlement action plan shall be prepared prior to the commencement of compensation	A Resettlement Action Plan will be developed to fill in the gaps
<p>No provisions are available for:</p> <ul style="list-style-type: none"> - Rehabilitation of income / livelihoods, - Assistance to landowners / tenants who have been severely affected by project activity <p>No compensation or assistance is envisaged with respect to the specified movable property</p>	<p>Lenders standards provide for rehabilitation of income / livelihoods, compensation for serious losses, and costs incurred by landowners / tenants during resettlement. Compensation shall include:</p> <ul style="list-style-type: none"> - Funds for improving living standards of displaced persons; - Costs for displacement; - Compensation for materials damaged during displacement; - Other transportation costs 	<p>If relocation will be required, the project will provide compensation to cover:</p> <ul style="list-style-type: none"> - the cost of replacement improvements; - shifting allowances; - compensation for deteriorated materials or goods during transportation; <p>rentals and other transactions costs</p> <ul style="list-style-type: none"> - The impact on livelihood will be assessed during RAP preparation and livelihood restoration measures will be defined.
Land expropriation and resettlement related decisions are exceptionally negotiated between landowners / official tenants and local authorities alienating assets	The information showing specific figures for the affected items, namely, assets value, social benefits and compensation amount / financial support will be disclosed to landowners and tenants prior to the start of preliminary project calculations. The general	The project will disclose the data on quantification of affected items, value of assets, entitlements, and compensation/financial assistance amounts to Project Affected Persons. The Resettlement Action Plan will be disclosed to public (personal sensitive

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	provisions of RAP (including the Rights Matrix (eligibility) for compensation) will be disclosed to public, whilst the personal data on losses / compensation will only be available to individuals / homeowners who have been adversely affected by the project. The project affected persons will be consulted on the provisions of the RAP.	individual information will be disclosed to Project Affected Persons only) through public consultations
The Ukrainian legislation lacks a special plan for public consultations.	Consultations with stakeholders and public involvement are an integral part in RAP preparation and implementation	The project will carry out a comprehensive consultative process with Project Affected Persons, local and state authorities, other stakeholders as being required through public disclosure meetings, individual consultations and public consultations
According to Ukrainian legislation only personalized grievances or appeal should be considered.	The Project implementer should consider all grievances and appeals including grievances from Contractor's personnel and anonymous	The implementer will consider all grievances and appeals.
The Ukrainian legislation have not special provisions for vulnerable people support during resettlement	Vulnerable people who warrant specific assistance must be identified and supported throughout the resettlement compensation process. World Bank's require that measures are provided to enable poor and vulnerable people (including women) who are physically displaced or affected by economic displacement to improve their incomes to at least national minimum standards.	The RAPs will define vulnerability criteria and identify affected vulnerable persons. Affected households categorized as vulnerable will receive specific assistance

7. Methodology for assessing lost assets

The redemption price of the assets to be alienated will be set by appraisers licensed to carry out appraisal activities. If the owner is entitled to compensation for the land, the redemption price will cover the costs of preparing the land management documentation required to obtain ownership of the land plot, as well as the costs associated with the state registration of the relevant ownership. Pursuant to Article 5 of the Law of Ukraine "On Alienation of Privately Owned Land Plots and Other Real Estate Located Thereon for Public Needs or for Reasons of Public Importance", the redemption value of a land plot to be alienated or transferred into ownership in lieu of the alienated one is determined on the basis of its expert monetary valuation conducted in accordance with the Law "On Land Valuation". An expert monetary valuation of

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land, which is carried out in connection with the acquisition of land for public needs, is carried out to determine the value of land plots to be alienated based on the methodological approach of capitalizing net operating or rental income from the use of land plots, taking into account their use for the intended purpose established as of the date of the decision by local authorities (Article 19(2) of the Law of Ukraine "On Land Valuation". The methodology for capitalizing net operating or rental income determines the value of a land plot in the most efficient use, taking into account the established encumbrances and other restrictions related to the land. Net operating income is determined based on an analysis of market rental rates for land. Lease income is calculated as the difference between the expected income from the products obtained on the land plot (actual or expected), production costs and producer's income⁵.

Reports on the expert monetary valuation of alienated land plots must undergo a state examination of land management documentation in cases and in the manner prescribed by law. The land valuation expert will be appointed by local executive authorities. If the owner does not agree with the alienation of his/her real estate based on the valuation conducted by a licensed appraiser appointed by central or local executive authorities, he/she may engage another licensed appraiser to determine the value of the real estate or to verify the valuation document of such property. In this case, the cost of such services will be covered by the property owner. An alternative appraisal made at the request of the landowner cannot be accepted for consideration by the local executive authority. It will simply become an alternative point of view for the owner when deciding whether to accept the offer from the local executive body or not. Any alternative value can be determined only through the court (which will appoint an independent appraiser).

The redemption price of assets that have been expropriated is agreed with the owner of the assets during official negotiations between the owner and the local executive authority, as provided for in Article 11 of the Law of Ukraine "On the Alienation of Privately Owned Land Plots and Other Real Estate Located Thereon for Public Needs or for Reasons of Public Importance".

To compensate for the differences between Ukrainian legislation and IBRD requirements, the AR will provide other types of compensation or resettlement assistance as listed in Table 3 during RAP implementation. The identification of all PAPs and required types of compensation for each person will be taken during RAP preparation.

In accordance with Ukrainian legislation, compensation for land will be offered to all persons adversely affected by the Project and at risk of losing their land in accordance with the procedure established by Ukrainian legislation, if land is available.

Asset owners who are dissatisfied with the decisions of the local executive authority may apply to the court in accordance with the procedure established by Ukrainian law. The court also determines the party that will pay the court costs.

8. Organisational arrangements for compensation procedure and responsibilities of each party

After approval of the design documentation, the AR regional branch will take measures provided for by the Land Code of Ukraine aimed at approving the Project location with the local authorities. In addition, the AR will engage land management organizations with the appropriate license for land management activities and access to the State land cadaster data to establish project boundaries and determine the necessary additional land and real estate acquisition. Once the required amount of additional land and other fixed assets located on the land is determined and a list of asset owners is compiled, the AR will develop a relevant Resettlement Action Plan. Depending on the number of land plots and their geographical location.

⁵<https://zakon.rada.gov.ua/laws/show/1531-2002-%D0%BF>

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After the IBRD approves the RAP, AR will be authorized to take steps to acquire the land required for the Project in accordance with the applicable laws of Ukraine. The AR regional branches will negotiate with the owners for preliminary consent to subdivide the land plots, order the preparation of technical documentation, including the procedure for valuation of the land plots and real estate located on them. After obtaining the owners' consent to the division of the land plots and real estate located on them, as well as to the preparation of technical documentation, AR will apply to local executive authorities (local public administration (LPA)) with a request to acquire the assets.

Based on the documents provided by AR, the head of the LPA issues an order to acquire the assets. The LPA starts negotiations with the owners of the assets and obtains their written consent to the alienation of their land plots, which is confirmed by the relevant records (protocol). After the owner confirms his/her consent to the alienation of the asset, the owner and the local executive authority sign a purchase/sale agreement, according to which the LPA undertakes to pay the agreed price of the asset within 10 days after the conclusion of the agreement, and the owner is obliged to give up his/her land plot or real estate within the same period.

After the agreement is concluded and compensation is paid to the owner, the designated purpose of the land plots is changed to 12.01 "For the placement and operation of buildings and structures of railway transport" and 12.04 "For the placement and operation of buildings and structures of road transport and road facilities" according to the classification of types of designated purpose of land plots, and then the land plots are transferred to AR regional branch for permanent use and duly registered with the State Land cadaster.

If no agreement is reached between the owner and the local executive authority on the alienation of assets, in accordance with Articles 15 and 16 of the Law of Ukraine "On the Alienation of Privately Owned Land Plots and Other Real Estate Located Thereon for Public Needs or for Reasons of Public Necessity," the latter shall file a claim for the expropriation of the asset with the administrative court within 6 months from the date of the order of the LPA. A court decision on the expropriation of a land plot and other real estate located on it, together with documents confirming the temporary and full payment of the redemption price to the former owner or the state registration of ownership of real estate provided in lieu of the alienated assets, is the basis for the state registration of the ownership of the state or territorial community of these objects.

No work can commence on the land until the owner is paid full compensation for the value of the assets. In case the process of land or real estate acquisition for reasons beyond the control of AR or local authorities causes delays in the Project (either due to the owner's inheritance procedure, the owner's long absence from the territory of Ukraine, registration of the land plot with the State land cadaster, court encumbrances on the alienation of property in connection with inheritance disputes, etc.), the regional AR branch will request the owner to provide written consent to perform the works. The preliminary full amount of compensation is paid by the LPA to the account of the local notary office in accordance with the order of the Ministry of Justice of Ukraine No. 296/5 dated February 22, 2012, until disputes, inheritance issues, etc. will be resolved.

9. Disclosure of Resettlement Policy Framework Document and RAP

Previous consultations

MDCT and AR have conducted consultations with relevant stakeholders, including government agencies, local authorities, enterprises, and civil society organizations, to gather feedback on the Project design and its potential impacts. These consultations aimed to ensure

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that concerns, expectations, and recommendations from affected and interested parties were taken into account during the planning and decision-making processes.

The following public consultation meetings were conducted:

No.	Date	Target audience	Purpose	Venue	Number of Participants
1	08.11.2024	Experts in transport sector, local authorities, regional services for restoration	The purpose of the consultations was to discuss the initial composition of the project and the draft Stakeholder Engagement Plan, primarily within the expert community, in order to take into account the opinions of representatives of relevant agencies and institutions regarding the project composition and to identify additional stakeholder groups for their involvement in the project.	Due to safety reasons the consultations were conducted virtually.	17
2	20.01.2025	All groups of stakeholders	All stakeholders were informed about new Project design, purpose, timeline and channels for communication, RPF and updated SEP	Due to safety reasons the consultations were conducted virtually.	46

The public consultations process is still opened during project implementation. Stakeholders may appeal to the MDCT and AR with proposals/informational request at all stages of project implementation and their appeal will be responded during 30 days according to the Law “On citizen’s appeals”.

The next round of public consultation will be carried out for The environmental and social reports and plans will be disclosed. The disclosed documents will include Environmental and Social Commitment Plan (ESCP) and Environmental and Social Management Framework (ESMF) Due to the limitations caused by russian invasion public consultations and stakeholder engagement will be organized virtually/remotely. Feedback received during consultations will be taken into account by MDCT and AR.

Disclosure of the RPF

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For data protection reasons regarding the infrastructure object, all information regarding the project implementation will be published on the website of MDCT and AR and the Bank. Copies of this document will be provided upon individual and group requests from citizens, as well as requests from state authorities, local self-government bodies, and members of parliament.

In addition, stakeholders can submit their suggestions and comments in the following ways:

MDCT regarding overall Project information

MDCT - hotline number: 044-351-48-01(every Tuesday from 2 to 4 PM)

By e-mail: miu@mtu.gov.ua

Send a letter to the MIU: Kyiv -135, Beresteysky ave., 14

AR

AR hotline number: +38 067 400 60 80

By email: Info@restoration.gov.ua, Ifi@restoration.gov.ua, info@restoration.gov.ua

Send a letter to AR: 03150, Kyiv, Fizkultury str., 9

10.Livelihoods Recovery Framework

During the Project implementation, it may be necessary to apply strategies for PAP to restore their livelihoods. This strategy covers asset owners, tenants and informal users of assets. The main goal of this strategy is to restore the quality of life of affected persons to at least the level they had before the Project or even improve it. Compensation for loss of assets will be paid in accordance with the matrix of entitlements, but in some cases compensation may not guarantee full restoration of livelihoods and additional measures may be required. Livelihoods restoration may be required both at the individual and community level (in case the level of community and public services has decreased or become more difficult to access; if some public recreation areas have been negatively impacted by the Project, etc.).

At the community level, the Project design documentation will be updated or special plans for the restoration of public services will be developed. The restoration of community affected infrastructure will be consulted with local authorities and users.

Livelihood restoration of project affected persons may be applicable in such situations as:

- Physical resettlement
- When the land to be acquired or restricted is an only source for income
- When persons will lose the job or business as result of project implementation.

The Livelihood restoration measures might be necessary will be identified during socio-economic study within the framework of RAP preparation. RAP will be containing the livelihood restoration plan applying the following principles:

- Livelihood restoration measures will be developed taking into account not only physical persons but also community sustainable development;

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- The elaborated livelihood restoration measures will be consulted with Project affected peoples and communities' members.
- The livelihood restoration measures will be implemented prior start of resettlement process for avoiding of period when resettlement or economical displacement have been done but the livelihood restoration measures not provided yet.
- During implementation of livelihood restoration, the gender differentiated approach will be followed because as usual women and girls are more vulnerable to displacement. The livelihood restoration activities will take into account women's needs and preferences.

11. Grievance redress mechanism

Transparency and accountability are key elements of the Project. That is why the Project provides for a Grievance Redress Mechanism (GRM). The purpose of the GRM is to strengthen accountability to beneficiaries and to provide stakeholders with a channel for feedback and/or complaints about Project-related activities. The GRM is a mechanism that allows to identify and resolve issues that affect the Project. By increasing transparency and accountability, the GRM aims to reduce the risk of indirect negative impacts on citizens/beneficiaries, and provides an important feedback and learning mechanism that can help to enhance the positive impacts of the Project.

The GRM is focused not only on receiving and recording grievances, but also on resolving them. While feedback should function at the level closest to the point of grievance, all grievances will be recorded and addressed as described in this section.

The resettlement and relocation process may generate a number of grievances and complaints from those adversely affected by the Project. These may include grievances related to land acquisition, rights, compensation, disruption of livelihoods, services and facilities, problematic issues, etc.

- a person (or a group of persons) may apply to the AR or MDCT by the channels indicated in Para 9. The body to which the person applies resolves the complaint and responds to the complainant within the time limits established by the Law of Ukraine "On Citizens' Appeals". The response and resolution of the subject matter of the complaint shall take place within 30 days. If the resolution of the complaint/application does not require additional measures (i.e., a request for information), the response will be provided within 15 days. If the complaint cannot be resolved within 30 days, the complainant will be notified of the extension of the deadline (if the complainant has provided his/her contact information). The total period for resolving issues may not exceed 45 days. Complaints received from vulnerable citizens will be considered out of turn and as soon as possible.

The project should ensure flexibility in the available channels for grievances, as well as provide access to contact information for persons submitting grievances.

For this purpose, in addition to the Grievance Log provided by the project (Annex A), citizens can also file their appeals in accordance with Article 5 of the Law of Ukraine "On Citizens' Appeals". In the latter case, appeals filed by citizens must contain their full name, place of residence, question to question, comment, statement, claim, application, request or demand. A written appeal must be signed and dated by the appellant(s). An appeal sent by e-mail to the above-mentioned implementation parties must contain an e-mail address or postal address or any other means of communication to respond to the appeal. The use of an electronic signature is not required for email appeals.

The term for consideration and resolution of complaints is up to 30 days.

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If no agreement is reached on the complaint, the complainant may apply to the court as the last instance of the relevant jurisdiction in accordance with the procedure established by applicable national law.

For each RAP, a grievance mechanism will be developed on the basis of this RPF, both at the local level and at the level of AR. Where to file grievances will be specified in the RAP, which will also be communicated to the public during consultations.

The AR have the opportunity to regularly monitor the grievance process. All grievances received at both local and Project level during preparation, implementation and post-implementation monitoring phase of the RAP, as well as measures taken by the parties to address these grievances, will be recorded in a grievance log and sent to IBRD on a quarterly basis or upon request.

The grievance redress mechanism will be managed at multiple levels. Local authorities, project implementation teams and E&S specialists will be responsible for receiving and recording complaints, which can be submitted via hot-line telephone, email, official websites, or during public consultations.

All grievances will be logged in the official Grievance Log, maintained at both local and Project levels, with each complaint assigned a unique reference number for tracking. The AR will designate grievance focal point who will be responsible for grievances handling, monitoring and grievance log maintenance. The MDCT will oversee compliance with RAP commitments.

The AR will monitor the grievance process and submit regular reports to the IBRD, summarizing the number, nature, and resolution status of grievances. This mechanism ensures transparency, accountability, and timely resolution of concerns raised by project-affected persons.

12. Measures to monitor land acquisition and compliance with Donor's requirements

In order to monitor the land acquisition process and resolve grievances, the Project will engage an expert to notify the MDCT and IBRD of any violations of landowners' rights, any additional negative impacts on the population, keep a log of grievances, monitor the number of land plots required for acquisition, and submit relevant reports.

AR will closely cooperate with their PIU, which will provide operational support to the Project implementation and report to the AR on the progress of the compensation procedure and the number of land plots to be alienated, as well as on complaints received from stakeholders and measures taken to address them.

The monitoring indicators are shown in the table below.

Indicator	Additional notes	Frequency
Overall information about RAP implementation	<ul style="list-style-type: none">- The amount of land plots which need to be acquired- The amount of structures needed to be acquired:- Amount of PAPs (by groups) that claim to compensation- Number (and percentage) of land	Quarterly

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	plots/houses/businesses for which compensation packages have been provided	
Number of formal and informal households that have to be physically displaced Number of formal and informal businesses that have to be relocated	Data will be received through the census/survey.	Quarterly
Number of grievances regarding RAP implementation received	Grievances which were received by all project implementation parties and how they were addressed.	Quarterly

Upon completion of the RAP, an independent audit will be conducted to ensure that any livelihood restoration and land acquisition activities are actually completed.

13. Budget

As of the date of submission of the RPF, the design documentation has not yet been developed, and it is not possible to determine the cost of land acquisition, compensation payments and implementation of mitigation measures at this time. Estimates of compensation and mitigation measures will be finalized at the stage of RAP preparation, when the project documentation is ready.

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Annex A Grievance log template

No	Date	Type	Recipient	Location	Name of complainant	Brief of Grievance	Brief of response	Date of response