



Independent
Project
Accountability
Mechanism

MAP Monitoring Report I
Monitoring Period: September 2020 – January 2021

Nenskra Hydro Power Project
EBRD Project Number 46778
Case 2018/08

April 2021

Note: This case was received under the Project Complaint Mechanism (PCM) - the former accountability mechanism of the EBRD - in accordance with the [2014 PCM Rules of Procedure](#) and the Monitoring stage was initially conducted under PCM Rules and Procedures.

Effective 1 July 2020, the Project Complaint Mechanism was replaced with the [Independent Project Accountability Mechanism](#) (IPAM), brought into effect through the [2019 Project Accountability Policy](#). Under the Policy's provisions for case transition, monitoring of the Nenskra Hydro Power Project Management Action Plan from the date above is undertaken in alignment with the requirements of the [2019 Project Accountability Policy](#) and in accordance with the adopted [MAP Monitoring Plan](#).

IPAM is the Independent accountability mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Complainants and Clients to resolve environmental, social and public disclosure concerns without attributing blame or fault; or ii) Compliance Reviews, which determine whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project.

For more information about IPAM, please contact us at ipam@ebrd.com or visit the [IPAM webpage](#).


<p>Contact information</p> <p>The Independent Project Accountability Mechanism (IPAM) European Bank for Reconstruction and Development One Exchange Square London EC2A 2JN</p> <p>Telephone: +44 (0)20 7338 6000 Email: ipam@ebrd.com</p>	<p>How to submit a complaint to the IPAM</p> <p>Concerns about the environmental and social performance of an EBRD Project can be submitted by email, telephone or in writing, or via the online form at:</p> <p> https://www.ebrd.com/project-finance/ipam.html</p>
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Unless otherwise indicated capitalised terms used in this report are those as set forth in the 2019 Project Accountability Policy.

List of Abbreviations

Abbreviation	Long Form
EBRD	European Bank for Reconstruction and Development
ESIA	Environmental and social impact assessment
ESAP	Environmental and social action plan
ESD	EBRD Environmental and social department
ESP	EBRD Environmental and Social Policy
IPAM	Independent Project Accountability Mechanism
IP	Indigenous Peoples
Lenders / Sponsors	Means the financiers of the Project, which include the European Bank for Reconstruction and Development (EBRD), European Investment Bank (EIB), the Asian Development Bank (ADB), the Asian Infrastructure Investment Bank (AIIB), the Korean Development Bank (KDB) and the Korea Trade Insurance Corporation (K-SURE)
MAP	Management Action Plan
MDB	Multilateral development bank
OGC	Office of the General Counsel
PAP or Policy	IPAM Project Accountability Policy
PCM	Project Complaint Mechanism
Project	Nenskra Hydro Power Project (46778) in Georgia

Executive Summary

On 31 May 2018, the Project Complaint Mechanism (PCM) received a Complaint from community members of Chuberi, Georgia, co-submitted with CEE Bankwatch Network and Green Alternative (the Complainants), related to the [Nenskra HPP \(46778\)](#) in Georgia.

The PCM Expert responsible for the Compliance Review identified non-compliance across five (5) of the 2014 Environmental and Social Policy Performance Requirements, and provided eleven (11) Project-level and systemic recommendations to address said non-compliance.

In accordance with the 2014 PCM Rules of Procedure, EBRD Management prepared a Management Action Plan (MAP) to respond to the Expert's findings and recommendations. Management sought Audit Committee endorsement of the draft MAP on 16 July 2020. Audit Committee members requested some minor modifications, after which the Board under the non-objection procedure approved a final version in August 2020 that includes eleven (11) actions to be implemented.

The Compliance Review Report and the approved MAP were disclosed on the [IPAM case registry](#) on 11 August 2020 thus initiating the MAP monitoring stage.

This report covers the first monitoring period, September 2020 to January 2021 since the approval of the MAP by the Board, and reflects the status of MAP implementation. During that period, IPAM produced a [MAP Monitoring Plan](#) disclosed in November 2020 on the [IPAM case registry](#), to guide the monitoring process in order for IPAM to deem the actions completed.

For this first monitoring period, the MAP had committed to a number of deliverables in relation to Management Actions 1, 4, 5, 8 and 10. IPAM has reviewed documentation provided by Management, engaged with Bank staff to get a better understanding of how specific recommendations are being met through the MAP. In addition, IPAM met virtually with Complainants to listen to their views and concerns.

Based on IPAM's monitoring of actions and requirements for completion of each of the actions as outlined in the MAP implementation monitoring plan, IPAM has determined that [Action 1 i\)](#), [Action 3 i\)](#), [Action 4 i\) and ii\)](#), [Action 8 i\)](#) and [Action 10 i\)](#) are completed. Given the concerns raised by the Complainants, IPAM will maintain Action item 5, Phase 1 (desk study) open.

SUMMARY OF ACTIONS

S.No.	ACTIVITY	TIMELINE
1.	Compliance Review completion	July 2020
2.	Management Action Plan approval	August 2020
3.	MAP Monitoring Plan	November 2020
4.	1 st monitoring report covering period September 2020 – January 2021	April 2021

IPAM will continue to monitor the other actions that are due as per the MAP Monitoring plan and report on their status during the next monitoring period covering the period February 2021 to July 2021.

1. Introduction

This is the first Monitoring Report on implementation of the Management Action Plan related to [case 2018/03](#) Nenskra HPP (46778). The Project Complaint Mechanism (PCM) registered the case in 2018 and Ms. Andrea Saldarriaga, PCM Expert, undertook the Compliance Review of the Case as per the 2014 PCM Rules of Procedure. In line with the latter, the Compliance Review Report and the Management Action Plan (MAP) to address the findings and recommendations of the report were submitted to the EBRD Board of Directors in July 2020, and the MAP ultimately approved on 5 August 2020.

On 1 July 2020, the 2019 Project Accountability Policy (PAP) became effective thus superseding the 2014 Rules of Procedure. Consequently, per the transitional provisions established in section V of the PAP, monitoring of the Nenskra MAP implementation fell under the responsibility of IPAM as per the PAP provisions for monitoring (paragraph 2.8 of the PAP).

In the second half of 2020, IPAM produced and disclosed a [monitoring plan](#) for this case. This is the first monitoring report, which covers IPAM monitoring activities in relation to relevant Management Actions for the period September 2020 to January 2021.

2. Background

On 31 May 2018, the Project Complaint Mechanism (PCM) received a Complaint from community members of Chuberi, Georgia, co-submitted with CEE Bankwatch Network and Green Alternative (the Complainants), related to the [Nenskra HPP \(46778\)](#) in Georgia.

The PCM Expert responsible for the Compliance Review identified non-compliance across five (5) of the 2014 Environmental and Social Policy Performance Requirements, and provided eleven (11) Project-level and systemic recommendations to address said non-compliance.

In accordance with the 2014 PCM Rules of Procedure, EBRD Management prepared a MAP to respond to the Expert's findings and recommendations. Management sought Audit Committee endorsement of the draft MAP on 16 July 2020. Audit Committee members requested some minor modifications, after which the Board under the non-objection procedure approved a final version in August 2020.

The Compliance Review Report and the approved Management Action Plan (MAP) were disclosed on the [IPAM case registry](#) on 11 August 2020 thus initiating the MAP monitoring stage.

2.1 Compliance Review Findings

In July 2020, the Expert found the Bank to be non-compliant with Performance Requirement 7, 1, 5, 8 and 10 of the 2014 ESP. These instances of non-compliance related to the Complainants' concerns, finding as follows:

With reference to PR 7 - Indigenous Peoples

[...] Bank Management did not adequately appraise the Client's examination of the potential application of the PR 7 eligibility criteria. While Bank Management correctly identified the need for the Client to employ GIP in assessing the PR 7 eligibility criteria, Bank Management did not to subsequently seek to ensure that those requests were fulfilled. Specifically, the EBRD approved the Client's analysis of PR 7 eligibility, despite evidence that:

- the analysis did not ensure that best possible information was sought, as it did not include diverse views and expertise in the assessment of the eligibility criteria applicability; and
- the Client did not consult Project-affected communities on the applicability of all 2014 ESP eligibility criteria.

With reference to PR 1 - Assessment and Management of Environmental and Social Issues

[...] Bank Management correctly identified the need for a Cumulative Impact Assessment (CIA) to be undertaken during the gap analysis, but did not seek to ensure that the CIA met the PR 1 requirements. Bank Management ultimately approved the Project without adequate research to ensure the identification of all reasonably foreseeable extractive or forestry activities.

Separately, the Compliance Review found that the 2015 Environmental and Social Impact Assessment (2015 ESIA) and the Supplementary Environmental and Social Studies (Supplementary E&S Studies) did not provide an analysis of alternatives with due consideration to environmental and social impacts as required by PR 1 para. 10. In addition, the Compliance Review established that the Bank failed to seek to ensure that the Client attempted to collaborate with the relevant third party (i.e., the Government of Georgia) to meet the alternatives assessment requirements set out in PR 1, as outlined in para. 39 of the 2014 ESP.

In addition, it was established that the Bank Management did not seek to ensure that the Client fulfilled the 2014 ESP requirements on gender, neglecting to identify material shortcomings in the Project approach or undertaking meaningful, gender inclusive engagement during stakeholder consultation, as required by PR 10 paras. 10 and 12.

With reference to PR 5 - Land Acquisition, Involuntary Resettlement and Economic Displacement

[...] Bank Management did not seek to ensure that PR 5 requirements related to livelihood restoration were met, and allowed an arbitrary threshold for livelihood restoration to be established (i.e., where those incurring losses >10% would not be eligible for restoration measures, despite PR 5 requirements to restore livelihoods and standards of living).

With reference to PR 8 - Cultural Heritage

[...] Bank Management approved the Client's environmental and social impact assessment without seeking to ensure that the Project met important community consultation requirements under PR 8. Bank Management did not identify these areas as needing further corrective action and therefore did not request or monitor their implementation. As a result, the Bank did not seek to ensure that important potential impacts to Project-affected people were adequately identified and mitigated, in accordance with paras. 10 and 15 of PR 8.

With reference to PR 10 - Information Disclosure and Stakeholder Engagement

[...] Bank Management did not address some of the important issues relating to the capacity and commitment of the Client to execute stakeholder engagement as required to do under para. 30 of the 2014 ESP.

2.2. Compliance Review Recommendations

In response to the findings of non-compliance, the Expert made eleven recommendations to the Bank, as outlined in the [Compliance Review Report](#): four that were systemic / procedural in nature, and seven others, specific to the Project.

Systemic and Procedural Recommendations to address EBRD Non-compliance

Recommendation 1: establish a systemic tracking tool for EBRD requests to its Clients, allowing Bank Management to better ensure that Project-specific requests in relation to ESP adherence are effectively implemented.

Recommendation 2: develop clear, step-by-step policy Guidance to direct Clients in the effective assessment of the ESP PR 7 Indigenous Peoples eligibility criteria (for the 2014 ESP as well as other ESP iterations). The Guidance should be developed through a participatory process involving multiple, recognised Indigenous Peoples Experts, civil society and industry representatives, and should be informed by GIP employed by both IFIs and the private sector. This Guidance should include (i) specific recommendations from GIP methodologies that ensure PR 7 eligibility criteria are robustly assessed; and (ii) specific processes and measures that guide Clients in the application of PR 7 in instances where indigeneity is not recognised at the national level.

Recommendation 3: where third parties are responsible for Project siting, design and alternatives assessment, require Clients to consistently approach relevant third parties to request that these decision-making processes include environmental and social considerations. Bank Management should document these Bank and Client requests.

Recommendation 4: strengthen capacity of the EBRD Environment and Sustainability Department (ESD) on gender issues, and ensure the use of external consultants with strong experience and capabilities in this area.

Project-specific Recommendations to address EBRD Non-Compliance

Recommendation 5: take steps to ensure that an expanded assessment of the PR 7 eligibility criteria is conducted for the Nenskra Project, which incorporates all IFI GIP methodologies outlined in the Compliance Review Report, including a) a diversity of views and expertise and b) community consultation regarding each ESP PR 7 eligibility criterion.

Recommendation 6: address the gaps identified in the CIA (i.e., ensuring the assessment of potential cumulative impacts of planned or reasonably foreseeable mining and forestry developments in the Project area).

Recommendation 7: address the identified gaps in the analysis of the Project Alternatives, collaborating with the Client and the Government of Georgia to develop and disclose more detailed

analysis of the Project site selection and design to Project-affected communities in a robust and meaningful way. Disclosure should detail the rationale and value of the Project site selection and design from both social and environmental perspectives over other options considered, and providing justification of the projected financial benefits and costs of the Project.

Recommendation 8: facilitate an additional layer of gender impact assessment i) to evaluate issues not comprehensively addressed through the Client's environmental and social impact assessment and ii) to ensure the establishment of sufficient mitigation measures, with particular emphasis on the mitigation of gender-specific risks related to the influx of a large (predominantly) male workforce.

Recommendation 9: engage with the Client to address gaps in the LALRP, including the removal of the arbitrary threshold for livelihood restoration eligibility.

Recommendation 10: facilitate a further layer of cultural heritage impact assessment, in order to identify potential impacts to intangible cultural heritage in the Project area not fully reflected in the Client's environmental and social impact assessment, establishing appropriate mitigation measures in consultation with Project-affected people.

Recommendation 11: ensure that in accordance with para. 30 of the 2014 ESP, all members of the Client's environmental and social team possess the necessary competencies and abilities to manage the complexities and sensitivities of the Project in a manner consistent with the Bank's environmental and social standards.

2.3. EBRD Management Action Plan

In response to the Expert's findings and recommendation, the Bank prepared a Management Action Plan ([MAP](#)), approved by the Board and disclosed on 5 August 2020. The MAP details 11 actions to be implemented:

Management Action 1: Develop and implement a systemic tracking system for EBRD requests to clients, allowing the Bank to ensure that Project-specific requests regarding ESP adherence be implemented in a timely manner. This system will be included within ESD's Assurance Framework and will be used for all Category A projects to allow recording, tracking and closure of review comments provided to clients.

Management Action 2: Undertake a gap analysis of the revised PR7 in the 2019 ESP and the new PR7 Guidance. Note, currently under preparation, in light of this recommendation to ensure all elements are included. Finalise and publish the PR7 Guidance Note.

Management Action 3:

Sub-action 1: Define Good International Practice for the assessment of alternatives and adopt this as internal guidance as part of ESD's Assurance Framework.

Sub-action 2: Prepare internal guidance for disclosing when the analysis of alternatives has already been undertaken prior to the Bank's involvement in the project and the outcomes of the Bank's review of such an analysis against GIP.

Management Action 4:

Sub- action 1: Gender Based Violence and Harassment identification and management guidance is currently under finalisation and will be disclosed for use by EBRD and clients.

Sub- action 2: GBVH risk screening tools have been developed and training on gender based violence and harassment was delivered to ESD staff in 2019. Additional training on GBVH is planned after disclosure of the GBVH Guidance.

Sub- action 3: Internal guidance on wider gender considerations based on 2019 ESP and associated Performance Requirements will be developed and ESD will be trained to assist in addressing gender issues/risks in projects.

Management Action 5: Consult with project stakeholders including the project sponsors, project lenders, relevant department of the Government of Georgia and internationally and locally recognised experts in the field to define the appropriate next steps in the context of the project ESIA and the broader content of applicability of PR7 in Svaneti.

Management Action 6: Management will continue to engage with the project sponsors and their advisors to ensure that the CIA be updated, and disclosed, to incorporate the recommendations of the PCM Compliance Report.

Management Action 7: Management will continue to engage with the project sponsors and their advisors to address the alternatives assessment in parallel with MAP Item #3.

Management Action 8: Implementation of the proposed Technical Cooperation Project is anticipated to address the findings as they pertain to gender and inclusion. The Terms of Reference for the TC project will be shared with the PCM office and will include a two-stage approach, the first being the additional layer of gender impact assessment and the second the originally envisaged technical cooperation programme to go beyond compliance with the EBRD's ESP.

Management Action 9: Management will continue to engage with the borrower and their advisors to ensure that the LALRP is updated to incorporate the recommendations of the PCM Compliance Review including deletion of the references made to specific thresholds in the entitlement matrix.

Management Action 10: Management will continue to engage with the Client and their advisors to ensure that the cultural heritage impact assessment is updated to incorporate the recommendations of the PCM Compliance Review. The updated assessment will form the basis of the EPC management plans, which will be further revised during the early project implementation period.

Management Action 11: Management has engaged with the Client to undertake an environmental and social governance review and assess the project capacity requirements against the various project commitments to ensure full uptake and implementation of the environmental and social requirements. The results of this will assessment will be shared with the PCM office as it progresses.

3. Monitoring Report

This report covers the first monitoring period since the approval of the MAP by the Board, September 2020 to January 2021. During that period, IPAM produced a [MAP Monitoring Plan](#) disclosed in November 2020 on the [IPAM case registry](#), to guide the monitoring process.

For this period, the MAP had committed to a number of deliverables in relation to Management Actions 1, 4, 5, 8 and 10. In its Monitoring Plan, IPAM provided detail on the monitoring actions that it would undertake for each one of those deliverables in order to deem them as completed¹.

3.1 Monitoring Activities undertaken during the period

During the period, IPAM has reviewed documentation provided by Management, engaged with Bank staff to get a better understanding of how specific recommendations are being met through the MAP. In addition, IPAM met virtually with Complainants to listen to their views and concerns.

In relation to Management Action 1, IPAM met with Management for a presentation on the tracking system developed to address Recommendation 1². The tracking system is a project-specific spreadsheet whereby ESD responsible staff are to input the requests made to the Client and their due date. The use of the tool has been included in ESD's Assurance process.

To check in its efficacy, IPAM will follow up in a year on one of the Category A projects in the portfolio.

In relation to Action No. 4, IPAM received from Management and reviewed the **guidance note “Addressing Gender Based Violence and Harassment: Emerging Good Practice for the Private Sector”**³. The note was developed by the EBRD in collaboration with the International Finance Corporation (IFC) and CDC Group (CDC) and publicly disclosed in July 2020. Management also informed and provided IPAM with the GBVH risk screening tools developed and the training materials on GBVH used in the training sessions for ESD staff.

Management Action No. 5 establishes the commitment to consult with project stakeholders including the project sponsors, project lenders, relevant units of the Government of Georgia and internationally and locally recognized experts in the field to define the appropriate next steps in the context of the project ESIA and the broader content of applicability of PR7 in Svaneti. For that purpose, Management submitted to IPAM a preliminary report on the desk review undertaken in Phase 1, which analyses the criteria used by different IFIs in relation to indigenous peoples.

For Management Action No. 8, the period deliverables were the Terms of Reference for the gender impact assessment study. The ToRs include undertaking the assessment and the development of a gender action plan for the Project, as well as recommendations for the design of the EBRD-supported technical cooperation and a community investment programme.

¹ As per the PAP, IPAM will deem an action to be completed when the implementation plans and commitments are effectively carried out; and the timetable is met.

² Recommendation No. 1: to establish a systemic tracking tool for EBRD requests to its Clients, allowing Bank Management to better ensure that Project-specific requests in relation to ESP adherence are effectively implemented.

³ This guidance note is also publicly available at: the [CDC](#) website

Finally, in relation to Management Action No. 10, during this period, Management provided IPAM with the Request for proposals issued by the Client to update the cultural heritage impact assessment study. The ToRs reflect the requirement to develop a program of engagement to establish baseline cultural attributes in both the Nenskra and Nakra valleys in the Svaneti region, assess project impacts on cultural heritage – both tangible and intangible – and develop specific measures to avoid such impacts.

3.2 Complainants Perspective

IPAM engaged with the Complainants on 14 December 2020. During the meeting, the Complainants provided additional insights on their vision of the monitoring and current Project development. They underscored the importance of the analysis on application of PR7 to the Svaneti and ensuring the latter is based on a transparent, robust, independent process in which the Svanetis are consulted. They also commented on the importance of consultation for the different studies and plans that are, or will be, produced as part of the MAP. Additionally, they informed IPAM that there is no activity in the Project site due to contracting issues.

During the comments stage, IPAM engaged with the Complainants one last time before issuing the report. During the meeting, they expressed great concerns on the lack of consultation by Management regarding Action item 5, Phase 1 desk study of the PR7 applicability assessment. They commented that one of the salient findings of the Compliance Review was the lack of consultation and participation of the Svanetis in relation to the impacts of the Project to their communities. In addition, they were concerned that this same behaviour could be repeated in the implementation of the Management Action Plan thus reducing its value to the sustainability of the project.

During the meeting, Complainants appreciated the progress made by Management on action items 1.1, 3.1, 4, 8.1, and 10. However, they underscored the need for receiving timely information on how Management is planning to engage Project affected people and relevant stakeholders on the Gender and Cultural Heritage impact assessments.

3.3 Monitoring Conclusions

This report covers the first monitoring period, September 2020 to January 2021 since the approval of the MAP by the Board, and reflects the status of MAP implementation. During that period, IPAM produced a [MAP Monitoring Plan](#) disclosed in November 2020 on the [IPAM case registry](#), to guide the monitoring process in order for IPAM to deem the actions completed.

For this first monitoring period, the MAP had committed to a number of deliverables in relation to Management Actions 1, 3, 4, 5, 8 and 10. IPAM has reviewed documentation provided by Management, engaged with Bank staff to get a better understanding of how specific recommendations are being met through the MAP. In addition, IPAM met virtually with Complainants to listen to their views and concerns.

Based on IPAM's monitoring of actions and requirements for completion of each of the actions as outlined in the MAP implementation monitoring plan, IPAM has determined that [Action 1 i\)](#), [Action 3 i\)](#), [Action 4 i\) and ii\)](#), [Action 8 i\)](#) and [Action 10 i\)](#) are completed. Given the concerns raised by the Complainants, IPAM considers that there is an opportunity for Management to engage with the

Complainants to clarify issues and achieve common understandings and thus will maintain this Action item 5, Phase 1(desk study) open.

SUMMARY OF ACTIONS

S.No.	ACTIVITY	TIMELINE
1.	Compliance Review completion	July 2020
2.	Management Action Plan approval	August 2020
3.	MAP Monitoring Plan	November 2020
4.	1 st monitoring report covering period September 2020 – January 2021	April 2021

IPAM will continue to monitor the other actions that are due as per the MAP Monitoring plan and report on their status during the next monitoring period covering the period February 2021 to July 2021.

3.4 Table 1: MAP Implementation Progress - Actions due in the First Monitoring Period and their current status

Table 1 shows those actions that were due during the current monitoring period, the monitoring activities that IPAM would perform and the determination of completion, as per the criteria set in the PAP.

Action No.	EBRD Management Action Plan Commitment and Proposed Deadline for Completion	IPAM Proposed Monitoring Activity	IPAM monitoring activity due date	IPAM Requirement for determining completion	Status of Management Action Plan Commitment	IPAM Comments
1.	Develop and implement a systemic tracking system for EBRD requests to clients, allowing the Bank to ensure that Project-specific requests regarding ESP adherence be implemented in a timely manner. This system will be included within ESD's Assurance Framework and will be used for all Category A projects to allow recording, tracking and closure of review Comments provided to clients. Management Deadline: With immediate effect	Request meeting to become familiar with the tracking tool. Identify a sample case to test usage.	January 2021	Operational tracking tool is in place and working	Completed.	IPAM reviewed the tracking tool and Management identified a sample project to test usage.
3.	(i) Define Good International Practice for the assessment of alternatives and adopt this as internal guidance as part of ESD's Assurance Framework. (ii) Prepare internal guidance for disclosing when the analysis of alternatives has already been undertaken prior to the Bank's involvement in the project and the outcomes of the Bank's review of such an analysis against GIP. Management Deadline: By end of first monitoring period (See above for Management clarification)	Request meeting with Management to understand the process adopted and analysis conducted to define GIP for alternative assessment.	January 2021	Meeting convened	Completed	IPAM engaged with Management on 12 January 2021 to understand better the process adopted to define GIP for alternative assessment and the analysis conducted in this respect.

Action No.	EBRD Management Action Plan Commitment and Proposed Deadline for Completion	IPAM Proposed Monitoring Activity	IPAM monitoring activity due date	IPAM Requirement for determining completion	Status of Management Action Plan Commitment	IPAM Comments
4.	<p>(i) Gender Based Violence and Harassment identification and management guidance is currently under finalisation and will be disclosed for use by EBRD and clients.</p> <p>Management Deadline: By end of first monitoring period (See above for Management clarification).</p>	Review the GBHV identification and management guidance note.	January 2021	<p>Guidance note considered by IPAM.</p> <p>Guidance note disclosed by Management.</p>	Completed	IPAM reviewed the Guidance note on Gender Based Violence and Harassment identification and verified its disclosure by Management on this link .
	<p>(ii) GBVH risk screening tools have been developed and training on gender based violence and harassment was delivered to ESD staff in 2019. Additional training on GBVH is planned after disclosure of the GBVH Guidance.</p> <p>Management Deadline: action completed and additional training to be conducted during second half of 2020.</p>	<p>Request a meeting with the Management to familiarise with gender risk screening tools and its use in the projects.</p> <p>Revision of documentary evidence of trainings undertaken.</p>	January 2021	<p>Feedback received from Management on the usefulness of the tool.</p> <p>Receipt of training documents by IPAM.</p>	Completed	IPAM had a meeting with Management where the tools were presented and reviewed the training materials.
5.	<p>Consult with project stakeholders including the project sponsors, project lenders, relevant Department of the Government of Georgia and internationally and locally recognised experts in the field to define the appropriate next steps in the context of the project ESIA and the broader content of applicability of PR7 in Svaneti.</p> <p>Management Deadline: Phase One (Desk Study): November 2020 Deadline for Phase Two (Field Study): 24 months from MAP approval - August 2022.</p>	Review of the phase I report.	December 2020	Review of the phase I report.	Open	IPAM reviewed the desk study conducted as phase I report.

Action No.	EBRD Management Action Plan Commitment and Proposed Deadline for Completion	IPAM Proposed Monitoring Activity	IPAM monitoring activity due date	IPAM Requirement for determining completion	Status of Management Action Plan Commitment	IPAM Comments
8.	<p>Implementation of the proposed Technical Cooperation Project is anticipated to address the findings as they pertain to gender and inclusion. The Terms of Reference for the TC project will be shared with the PCM office and will include a two-stage approach, the first being the additional layer of gender impact assessment and the second, the originally envisaged technical cooperation programme to go beyond compliance with the EBRD's ESP.</p> <p>Management Deadline: Phase I (Gender impact assessment) – August 2021</p> <p>Phase II– TC project -24 months after loan signing</p>	Request and review the TOR of gender impact assessment study (Phase I).	December 2020	ToR considered by IPAM.	Completed	IPAM reviewed the ToR of gender impact assessment study (Phase I).
10.	<p>Management will continue to engage with the Client and their advisors to ensure that the cultural heritage impact assessment is updated to incorporate the recommendations of the PCM Compliance Review. The updated assessment will form the basis of the EPC management plans, which will be further revised during the early project implementation period.</p> <p>Management Deadline: 12 months from MAP approval. (if travel restrictions are lifted).</p>	Review of the ToR on Cultural Heritage Impact Assessment.	October 2020	Review of the ToR on Cultural heritage impact assessment.	Completed	IPAM reviewed the ToR on Cultural Heritage Impact assessment.