



Independent
Project
Accountability
Mechanism

MAP Monitoring Report IV

Monitoring Period: February – July 2022

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

November 2022

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](#).


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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 \(46778\)](#) Project 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 that 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. 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. In April 2021, IPAM issued its [first monitoring report](#) closing actions 1.i), 3.i), 4.i) and ii), Action 8.i), and Action 10.i) while keeping action 5.i) (desk study) open for the second monitoring period. In November 2021, IPAM issued the [second monitoring report](#) closing actions 5 (Phase 1) and 9 (partially), while keeping actions 2, 3.ii), and 4.iii) open for the third monitoring period. In May 2022, IPAM issued the [third monitoring report](#) closing actions 1, and 3. (ii) and noting that numerous actions have been delayed due to the lack of progress of the Project. New timeframes were provided for the delayed actions 2, 4, 6, 7, 8, 9, and 10.

This report covers the fourth monitoring period, which runs from February to July 2022. For this period, the MAP established deliverables in relation to Management Action 5 and 11 (periodic action for subsequent monitoring periods) and the IPAM Monitoring Plan detailed the activities to be undertaken by IPAM to determine them as completed according to the criteria set in the Project Accountability Policy¹.

In addition to this, actions pending from previous monitoring periods – according to their revised timelines - are also considered in this report. All revised timelines can be found in the [third monitoring report](#).

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 only Action 11 (a recurring action) can be completed in this monitoring period. Other actions remained pending either due to the delays in the project cycle or they were in progress, but there were remaining requirements under each of the actions that were pending for Management to implement and thus for IPAM to consider it completed.

The actions that will continue to remain open for the next monitoring period are:

- **Management Action 2** - the PR7 guidance note has been finalized and reviewed by the Board but is pending disclosure. The committed timeframe has not been met but a revised timeframe

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.

- has been provided - **Q1 2023. Action not completed - Monitoring to continue.**
- **Management Action 4.iii** – the guidance note is in the drafting process and training is pending. The committed timeframe has not been met but a revised timeframe has been provided – **Q3 2022. Action not completed - Monitoring to continue.**
 - **Management Action 5** - IPAM was informed that no progress has been noted on the Action, which is dependent on the Project cycle. **Action not completed - Monitoring to continue.**
 - **Management Action 6** – The CIA has been updated and reviewed by IPAM but disclosure is pending due to Project delays. The committed timeframe has not been met but a revised timeframe has been provided – **Q1 2023. Action not completed - Monitoring to continue.**
 - **Management Action 7** – The Action is pending due to Project delays. The committed timeframe has not been met but a revised timeframe has been provided – **Q1 2023. Action not completed - Monitoring to continue.**
 - **Management Action 8** - The second revision of the GIA and Action Plan was issued to the Lenders in April 2022. IPAM will wait for the final version of the GIA. The action remains open. The timeline has been revised to Q3 2022. The second element of Action 8, Technical Cooperation project has been pending due to its dependence on Project cycle. **Action not completed - Monitoring to continue.**
 - **Management Action 9** - The LALRP update report was submitted to the Lenders in March 2022. Comments were provided and were to be addressed throughout August 2022. Management shared the comments to be addressed with IPAM for review. IPAM will wait for the LALRP report's update in its final form to review it before it can close the action. **Action not completed - Monitoring to continue.**
 - **Management Action 10** – The document containing the Cultural Heritage Impact Assessment and Cultural Heritage Management Plan was issued to the Lenders in May 2022. The document is under review. IPAM will wait for the final version of the document to review it before it can close the action. **Action not completed - Monitoring to continue.**

COMPLIANCE PROCESS OUTPUTS AND TIMELINE

S.No.	ACTIVITY	TIMELINE
1.	Compliance Review completion	July 2020
2.	Management Action Plan approval	August 2020
3.	MAP Monitoring Plan	November 2020
4.	1st monitoring report covering period September 2020 – January 2021	April 2021
5.	2nd monitoring report covering period February 2021- July 2021	November 2021
6.	3 rd monitoring report covering August 2021- January 2022	May 2022
7.	4 th monitoring report covering February – July 2022	November 2022 ²

For the fifth monitoring period, in addition to those actions due in the fourth period, IPAM will monitor Management Actions 2,4 (iii) ,5,6, 7,8,9,10 and 11 (recurring action).

The next monitoring report is scheduled for disclosure at the end of February of 2023.

² The disclosure of this report was delayed as IPAM saw the need to engage further with Management, the Client, and the Requesters to gather information and views.

1. Introduction

This is the fourth Monitoring Report on implementation of the Management Action Plan (MAP) 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 followed by the [first monitoring report](#) in April 2021, the [second monitoring report](#) in November 2021 and the [third monitoring report](#) in May 2022.

This document is the fourth monitoring report, covering IPAM monitoring activities in relation to relevant Management actions for the period February to July 2022.

2. Background

On 31 May 2018, the 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, which have been outlined in the [Compliance Review Report](#).

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, which have been detailed in its [First Monitoring Report](#).

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 and the timeframe for their expected implementation.

3. Monitoring Report

This report covers the fourth monitoring period, which runs from February to July 2022. For this period, the MAP established deliverables in relation to Management Actions 5 and 11 and the IPAM Monitoring Plan detailed the activities to be undertaken by IPAM to determine them as completed according to the criteria set in the Project Accountability Policy³. (See table 1 for actions due this monitoring period)

In addition to this, Actions 2, 4 (iii), 6, 7, 8, 9, and 10 were still pending at the end of the previous monitoring period, so it is also considered within this report.

Table 1. Actions scheduled to be implemented in the period February - July 2022 as per the MAP - with original and revised timeline

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
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 deadline: Deadline for Phase Two (Field Study): 24 months from MAP approval - August 2022	- Review of the ToR for Phase 2 - Review consultation reports - IPAM to participate as observer in the planned consultation meetings. - Review the report on broader applicability of PR 7.	June 2022	- Engagement with Project Affected Svan, Client, GoG and CSOs has taken place. - IPAM participation as observer - Report considered by IPAM
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 assessment will be shared with the PCM office as it progresses	Request a periodic update on outcomes and measures established.	From August 2021 and until last Monitoring Report	Update received
Pending Actions from other monitoring periods				
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 Original Deadline: By end of first monitoring period Management Revised Deadline: Q1 2023	Review gap analysis and verification of Board review and disclosure process	July 2021	- Gap analysis completed by the Management - PR7 Guidance note reviewed by the Board - PR7 Guidance note disclosed by Management
4.	(iii) 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 Original Deadline: By end of first monitoring period Management Revised Deadline: Q3 2022	- Review internal guidance note on inclusion of wider gender considerations - Request training records - One IPAM team member to participate in a training session	July 2021	- Guidance note considered by IPAM - Receipt of training documents by IPAM - One IPAM team member

³ 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.

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
				participated in a training session
6.	<p>Management will continue to engage with the project sponsors and their advisors to ensure that the Cumulative Impact Assessment (CIA) be updated, and disclosed, to incorporate the recommendations of the PCM Compliance Report.</p> <p>Management Original Deadline: 12 months from the loan signing</p> <p>Management Revised Deadline: Q1 2023</p>	Review updated CIA and evidence of disclosure	January 2022	<p>- Updated CIA reviewed by IPAM</p> <p>- Updated CIA disclosed by the Management</p>
7.	<p>Management will continue to engage with the project sponsors and their advisors to address the alternatives assessment in parallel with MAP Item #3.</p> <p>Management Original Deadline: August 2021</p> <p>Management Revised Deadline: Q1 2023</p>	Review reported actions	September 2021	Management reports considered by IPAM
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 Original Deadline: Phase I (Gender impact assessment) – August 2021</p> <p>Management Revised Deadline for Phase I: Q3 2022</p> <p>Phase II – TC project -24 months after loan signing</p>	- Review the gender impact assessment report to assess gender impacts in relation to influx of migrant workers, potential introduction of trafficking and forced prostitution in accordance with GIP	<p>End 2021</p> <p>October 2021</p>	<p>- Gender impact assessment report and action plan considered by IPAM</p> <p>- TC program TOR received by IPAM</p>
9.	<p>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.</p> <p>Management Original Deadline: By end of first monitoring period</p> <p>Management Revised Deadline: Q3 2022</p>	Review of updated LALRP that will be prepared based on the design changes to address all potentially affected landowners/ users.	End 2021	LALRP reviewed and confirmed that it incorporates CR recommendations
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 Original Deadline: 12 months from MAP approval. (if travel restrictions are lifted)</p> <p>Management Revised Deadline: Q3 2022</p>	<p>- Review the updated cultural heritage impact assessment and Cultural Heritage Management Plan.</p> <p>- IPAM will also consider attending planned consultation meetings with project-affected people to observe their feedback.</p> <p>- Review progress update report on implementation of the Cultural Heritage Management Plan. IPAM to organise a meeting</p>	<p>End 2021</p> <p>August 2021</p>	<p>- Cultural heritage impact assessment report and Cultural Heritage Management Plan received</p> <p>Monitoring report received confirming the implementation of</p>

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
		with Management if required. - Review of monitoring reports on Community Investment Projects designed to support Cultural Heritage beyond impact management	January 2022	the Cultural Heritage Management Plan requirements by the project team. - Community Investment Programme monitoring reports received confirming additional projects to support cultural heritage. - Stakeholder engagement records received.

3.1 Monitoring Activities undertaken during the period

During the period, and based on the actions to be monitored, IPAM requested information from the Management, conducted a meeting with the Requesters and reviewed the relevant documents submitted to consideration. IPAM also followed up with the Client on Requesters concerns and received reassurances that the Requesters' advisers NGOs will be directly contacted regarding the MAP implementation progress. IPAM will review if that commitment was followed upon in the next monitoring period.

Management updates

IPAM requested written updates from the Management who provided IPAM with the information about actions' progress and related evidence.

The Management also confirmed to IPAM that the Project continues to face delays, which impacts the completion of some of the MAP actions. However, several actions were undertaken by the Client and have progressed, particularly those focused on assessments and report updates. Further detail on each action can be found in the upcoming sections.

Meetings with Requesters

As a part of the monitoring, IPAM also met virtually with the Requesters, and discussed their concerns regarding the level of stakeholder engagement during the implementation of the MAP and as a part of conducting relevant studies. Their perspective is presented in section 3.2.

Summary of MAP Progress by Action

- **Management Action 2** - the PR7 guidance note has been finalized and reviewed by the Board but is pending disclosure. The committed timeframe has not been met but a revised timeframe has been provided - **Q1 2023. Action not completed - Monitoring to continue.**
- **Management Action 4.iii** – the guidance note is in the drafting process and training is pending. The committed timeframe has not been met but a revised timeframe has been provided – **Q3**

2022. Action not completed - Monitoring to continue.

- **Management Action 5** - IPAM was informed that no progress has been noted on the Action, which is dependent on the Project cycle. **Action not completed - Monitoring to continue.**
- **Management Action 6** – The CIA has been updated and reviewed by IPAM but disclosure is pending due to Project delays. The committed timeframe has not been met but a revised timeframe has been provided – **Q1 2023. Action not completed - Monitoring to continue.**
- **Management Action 7** – The Action is pending due to Project delays. The committed timeframe has not been met but a revised timeframe has been provided – **Q1 2023. Action not completed - Monitoring to continue.**
- **Management Action 8** - The second revision of the GIA and Action Plan was issued to the Lenders in April 2022. IPAM will await the final version of the GIA. The action remains open. The timeline has been revised to Q3 2022. The second element of Action 8, Technical Cooperation project has been pending due to its dependence on Project cycle. **Action not completed - Monitoring to continue.**
- **Management Action 9**- The LALRP update report was submitted to the Lenders in March 2022. Comments were provided and were to be addressed throughout August 2022. Management shared the comments to be addressed with IPAM for review. IPAM will wait for the LALRP report's update in its final form to review it before it can close the action. **Action not completed - Monitoring to continue.**
- **Management Action 10** – The document containing the Cultural Heritage Impact Assessment and Cultural Heritage Management Plan was issued to the Lenders in May 2022. The document is under review. IPAM will wait for the final version of the document to review it before it can close the action. **Action not completed - Monitoring to continue.**
- **Management Action No. 11.** Management reported on the periodic engagement held with the Client and the all-party calls informing that the Client is progressing as expected. **Action is completed for the current period. This is a recurrent action until Project closure.**

3.2 Requesters' Perspective

IPAM engaged with the Requesters and their CSO advisers in a virtual session. During the meeting, they repeated their ongoing concerns about a lack of engagement between the Company and the local communities. They referred to a Business & Human Rights Resource Centre (BHRRC)'s study on hydropower projects in the Caucasus and Central Asia from July 2022, claiming they were dissatisfied with the official response of the Client to the study ([the response can be found here](#)). They said that although the Client claimed that numerous studies had been conducted, the Requesters were not familiar with any of those. They have not seen any draft documents and were not consulted regarding them. Therefore, they perceive that the recommendations are being addressed as a "tick-the-box" exercise, omitting the most important conclusions of the Compliance Review, which concerned insufficient stakeholder engagement. The Requesters and specifically their advisor NGOs feel that they have been purposefully excluded from the MAP implementation, instead of being given a more active role as stakeholders in the process.

The Requesters also pointed out that the environmental situation in the Nenskra valley, has "changed a lot" in recent years. Therefore, from their perspective, whole new EIA process should be conducted when the Project restarts.

They informed IPAM about a complaint submitted to the Standing Committee of the Bern Convention. It is their view that floods and the increase of smaller hydropower plants in the area

have affected the environment. According to them, the Committee has put the consideration of the complaint on standby until Spring 2023, waiting for information from the Georgian authorities.

Finally, the Requesters pointed out that they are considering submitting a new complaint to IPAM unless the communication process is improved and their concerns about consultation and information sharing are addressed.

IPAM contacted the Client and shared the Requesters' concerns, receiving assurances that the Client will directly contact them.

3.3 Monitoring Conclusions and Next Steps

This report covers the fourth monitoring period, February to July 2022 and reflects the status of MAP implementation. Any actions implemented from August 2022 will be recorded in the next monitoring report.

During the fourth monitoring period, IPAM reviewed documentation provided by Management, met virtually with the Requesters, and reached out to the Client to share the requesters' concerns for the following actions:

- Management Actions 5 and 11 which were due to be implemented in this period.
- Actions 2, 4, 6, 7, 8, 9, and 10 that were not implemented as per the proposed schedule⁴.

As a result of the monitoring, IPAM considers that one (recurring) action (Action 11) has been completed. The remaining actions are either on hold due to project cycle delays (Actions 2, 5, 6 and 7) or are progressing, according to the revised schedule provided by the Management in the previous monitoring period.

IPAM shares the concerns of the Requesters in relation to stakeholder engagement and information disclosure, as in this case, one of the key findings and recommendations was to improve the consultative process. Therefore, it is reasonable to expect that the implementation of the Management Action Plan will address this, making sure that the consultation process is transparent, inclusive, and robust. This includes providing the relevant information in a timely manner to all Project stakeholders, including the Requesters and their advisors.

Next Steps

For the fifth monitoring period, in addition to those actions due in the fourth period, IPAM will monitor Management Actions 2,4 (iii) ,5,6, 7,8,9,10 and 11 (recurring action).

The next monitoring report is scheduled for disclosure at the end of February of 2023.

⁴ For detailed information, go to Table 2 in the annex that reflects the monitoring activities scheduled to take place, outcomes, and determinations by action.

3.4 Table 2: MAP Implementation Progress - Actions due in the Fourth Monitoring Period, Actions remaining from previous monitoring periods and their current status

Table 2 shows those actions that were due during the current monitoring period and actions remaining from previous monitoring periods, 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
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 Deadline: By end of first monitoring period (January 2021)	Review gap analysis and verification of Board review and disclosure process	July 2021	- Gap analysis completed by the Management - PR7 Guidance note reviewed by the Board - PR7 Guidance note disclosed by Management	Not completed Disclosure pending Revised timeframe provided: Q1 2023	IPAM reviewed the PR7 guidance note including the review provided by the Board. IPAM will close the item when the management discloses it. No update on progress in this monitoring period.
4.	(iii) 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 Deadline: By end of first monitoring period	- Review internal guidance note on inclusion of wider gender considerations - Request training records - One IPAM team member to participate in a training session	July 2021	- Guidance note considered by IPAM - Receipt of training documents by IPAM - One IPAM team member participated in a training session	Not completed Revised timeframe provided: Q3 2022	IPAM reviewed the preliminary internal Guidance note on Gender Due Diligence across EBRD's investment operations, participated in the workshop and provided feedback to be included into the final Guidance note. Once IPAM receives the finalised note and training for the staff will be completed (when IPAM will participate), IPAM will consider the action complete. No update on progress in this monitoring period.

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
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.	- Review of the ToR for Phase 2 - Review consultation reports - IPAM to participate as observer in the planned consultation meetings - Review the report on broader applicability of PR 7.	June 2022	- Engagement with Project Affected Svan, Client, GoG and CSOs has taken place. - IPAM participation as observer - Report considered by IPAM	Not completed	IPAM was informed that no progress has been noted on the Action, which is dependent on the Project cycle.
6.	Management will continue to engage with the project sponsors and their advisors to ensure that the Cumulative Impact Assessment (CIA) be updated, and disclosed, to incorporate the recommendations of the PCM Compliance Report. Management Deadline: 12 months from the loan signing	Review updated CIA and evidence of disclosure	January 2022	- Updated CIA reviewed by IPAM - Updated CIA disclosed by the Management	Not completed Disclosure pending Revised timeframe provided: Q1 2023	IPAM reviewed the updated CIA additional materials and noted that the PCM expert recommendation to “to confirm whether there are any planned or reasonably foreseeable mining or forestry activities overlapping the Project area” has been addressed. The action will remain open until disclosure, which is pending due to the project cycle.
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 Deadline: August 2021	Review reported actions	September 2021	Management reports considered by IPAM	Not completed Revised timeframe provided: Q1 2023	IPAM was informed that no progress has been noted on the Action, which is dependent on the Project cycle.
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.	- Review the gender impact assessment report to assess gender impacts in relation to influx of migrant workers, potential introduction of trafficking and forced prostitution in accordance with GIP	End 2021 October 2021	- Gender impact assessment report and action plan considered by IPAM - TC program TOR received by IPAM	Not completed Revised timeframe provided: Q3 2022 for GIA and no	IPAM was informed that the second revision of the GIA and Action Plan was issued to the Lenders in April 2022. IPAM will await the final version of the GIA. The action remains

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
	Management Deadline: Phase I (Gender impact assessment) – August 2021 Phase II – TC project -24 months after loan signing				timeframe provided for TC project	<p>open. The timeline has been revised to Q3 2022.</p> <p>The second element of Action 8, Technical Cooperation project has been pending due to its dependence on Project cycle.</p>
9.	<p>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.</p> <p>Management Deadline: By end of first monitoring period</p>	Review of updated LALRP that will be prepared based on the design changes to address all potentially affected land owners/users.	End 2021	LALRP reviewed and confirmed that it incorporates CR recommendations	Not completed Revised timeframe provided: Q3 2022	<p>The LALRP update report was submitted to the Lenders in March 2022.</p> <p>Comments were provided and were to be addressed throughout August 2022.</p> <p>Management shared the comments to be addressed with IPAM for review.</p> <p>IPAM will wait for the LALRP report's update in its final form to review it before it can close the action.</p>
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>	<ul style="list-style-type: none"> - Review the updated cultural heritage impact assessment and Cultural Heritage Management Plan. - IPAM will also consider attending planned consultation meetings with project-affected people to observe their feedback. - Review progress update report on implementation of the Cultural Heritage Management Plan. IPAM to organise a meeting with Management if required. 	<p>End 2021</p> <p>August 2021</p> <p>January 2022</p>	<ul style="list-style-type: none"> - Cultural heritage impact assessment report and Cultural Heritage Management Plan received - Monitoring report received confirming the implementation of the Cultural Heritage Management Plan requirements by the project team. - Community Investment Programme monitoring reports received confirming additional projects to support cultural heritage. 	Not completed Revised timeframe provided: Q3 2022	<p>The document containing the Cultural Heritage Impact Assessment and Cultural Heritage Management Plan was issued to the Lenders in May 2022.</p> <p>The document is under review.</p> <p>IPAM will wait for the final version of the document to review it before it can close the action.</p>

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
		- Review of monitoring reports on Community Investment Projects designed to support Cultural Heritage beyond impact management		- Stakeholder engagement records received.		
11.	<p>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 assessment will be shared with the PCM office as it progresses.</p> <p>Management Deadline: August 2021 and periodically until project closure</p>	Request a periodic update on outcomes and measures established.	From August 2021 and until last Monitoring Report	Update received	Completed for this monitoring period	<p>Update received</p> <p>Management informed IPAM that the Client's staff participated in a capacity building training for frontline staff and stakeholder engagement in June 2022, funded by EBRD.</p> <p>There is also a continued engagement with Client's E&S staff on all aspects of the project, including monthly calls and workshops. EBRD is satisfied that the team in place has sufficient capacity.</p>