



Independent
Project
Accountability
Mechanism

MAP Monitoring Report I

Monitoring Period: December 2022 – October 2023

Shuakhevi HPP (Request # 2)
EBRD Project Number 45335
Case 2019/01

February 2024

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](#).

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 \(PAP\)](#). Pursuant to Section V on Transitional Provisions of the PAP the IPAM Head determined in July 2020 that concerning the ongoing Case 2019/01 Shuakhevi HPP (45335) that the assigned PCM Expert complete the compliance review process under the 2014 Rules of Procedure of the Project Complaint Mechanism. Following completion of the Compliance Review, in November 2022, and adoption of the Management Action Plan (MAP), in December 2022, monitoring of the MAP is undertaken in accordance with the requirements of the PAP and the adopted MAP.

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)</p> <p>European Bank for Reconstruction and Development</p> <p>5 Bank Street</p> <p>London, E14 4BG</p> <p>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, or via the online form at:</p> <p> https://www.ebrd.com/ipam</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
AGL or Client	Adjaristsqali Georgia LLC
EBRD	European Bank for Reconstruction and Development
ESIA	Environmental and Social Impact Assessment
ESP	EBRD Environmental and Social Policy
IPAM	Independent Project Accountability Mechanism
LESC	Lenders Environmental and Social Consultant
MAP	Management Action Plan
O-BAP	Operational Biodiversity Action Plan
PAP or Policy	2019 Project Accountability Policy
PCM	Project Complaint Mechanism
PR	Performance Requirement
Project	Shuakhevi Hydro Power Project (45335) in Georgia
SEP	Stakeholder Engagement Plan

Executive Summary

In July 2018, the Project Complaint Mechanism (PCM) received a Complaint from civil society organisations Green Alternative and CEE Bankwatch Network relating to the [Shuakhevi HPP \(45335\) project](#). The PCM conducted a Compliance Review following allegations of non-compliance with the 2008 EBRD Environmental and Social Policy (ESP). The external PCM Compliance Review Expert identified non-compliance across three (3) ESP Performance Requirements (PRs) and provided eight (8) Project-level and systemic recommendations to address said non-compliance. In accordance with para. 45 and 46 of 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 22 September 2022, where it was deemed that the Plan sufficiently addressed the findings and recommendations of the Compliance Review. The Board approved the Plan on 29 September 2022. The Compliance Review Report and the approved MAP were disclosed on the [IPAM case registry](#) on 19 October 2022 and the MAP Monitoring Plan that provides information on the actions IPAM would undertake was disclosed in December 2022.

The Board-approved MAP established that a number of actions would be completed by June 2023 with the remainder the subject of ongoing IPAM monitoring until December 2025.

The Project Accountability Policy establishes, at para 2.8 (b), that IPAM will consider Management Action Plans implemented if the implementation plans and commitments set out thereunder are being effectively carried out and implementation timetables are being met.

This is the first IPAM monitoring report, covering the period from December 2022 to October 2023, a longer monitoring period than normal due to IPAM workload and some delays in collecting relevant information.

For Case 2019/01, out of 10 actions required **IPAM has determined that three, Action 1 (finalisation and disclosure of the PR1 Guidance Note), Action 5 (b) (SEP addresses recommendations of the Compliance Review Report), and Action 8 (a) (publication of Operational Biodiversity Action Plan (O-BAP)), are completed.** Other actions remain pending either due to incompleteness or are recurring items.

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

- **Management Action 5 (a) – Action partially complete:** The updated Stakeholder Engagement Plan (SEP) was to be made publicly available in both English and Georgian by December 2022. On examination, IPAM found that while the most up to date SEP (Version D) is on the English language website, an earlier version (Version C) remains on the Georgian language website. Management is asked to ensure that the Georgian language website is updated within the next monitoring period;
- **Management Action 5 (c) – Action ongoing:** Management is required to ensure that the SEP is being implemented during the operational phase. While Management provided reassurance that the SEP was being implemented, it was unable to provide evidence of this and the Requesters expressed concerns about stakeholder engagement. The September 2022 Social Monitoring Report also set out several recommendations to improve the SEP which were supposed to be adopted by the Client, but this is still pending. IPAM will seek from Management a more comprehensive update on implementation of the SEP for its next monitoring report;

- **Management Action 6 (a) – Action partially complete:** Management was asked to ensure that a non-technical position paper on historical rock testing methods is made publicly available in English and Georgian. Although a document has been disclosed, IPAM considers it does not provide the information required. Management to ask Client to revisit the non-technical summary within the next monitoring period;
- **Management Action 6 (b) – Action incomplete:** Management undertook to ensure that the Client would make available any rock testing data to project affected people should it be requested. Management indicated that the availability of rock testing data has been communicated to project affected people via the community info centres, and that confirmation would be obtained from the LESC in the next monitoring report and review of the SEP. Management to provide evidence that Project-affected people have been informed about the possibility of requesting rock testing data within the next monitoring period;
- **Management Action 7 (a) – Action ongoing:** Management is required to provide IPAM with updates on water availability monitoring findings. Management indicated that spring water availability was primarily a concern during construction and that no further monitoring had taken place. Nonetheless, under the **Management Action Plan, Management committed to “continue monitoring for the lifetime of the EBRD loan to ensure there is no change in the situation”**. Such monitoring is to continue until December 2025 as per the Monitoring Plan, and IPAM requests water availability monitoring findings be provided until that date;
- **Management Action 7 (b) – Action ongoing:** Management is to provide IPAM with updates on water availability complaints raised in the grievance mechanism. Management has indicated that no grievances were received in the period under review. Under the **Management Action Plan, Management stated that “it [would] continue to review the grievance mechanism as part of routing monitoring”**. IPAM will ask Management to report on this in every monitoring period until December 2025;
- **Management Action 8 (b) – Action ongoing:** Management is required to provide updates on implementation of the O-BAP. Management provided material which indicates implementation of the O-BAP and compliance with PR6. The information provided by Management to IPAM reports that “the most notable trend described in the STA [statistical trend analysis] is that of the apparent declines in some fish species...” and that further monitoring is required to establish whether this is due to the project. IPAM will ask Management to report on this in every monitoring period and will seek further updates from Management.

Next Steps

IPAM finds Actions 1, 5 (b), and 8 (a) to be complete. For the next monitoring period IPAM will monitor Management Actions 5 (a), 5 (c), 6 (a), 6 (b) 7 (a), 7 (b), and 8 (b).

COMPLIANCE PROCESS OUTPUTS AND TIMELINE

S.No.	ACTIVITY	TIMELINE
1.	Compliance Review completion	19 October 2022
2.	Management Action Plan approval	19 October 2022
3.	MAP Monitoring Plan	9 December 2022
4.	First monitoring report covering period December 2022 – October 2023	15 February 2024

The second monitoring period will cover MAP implementation from November 2023 to April 2024 and IPAM will monitor outstanding and ongoing actions.

The next monitoring report is scheduled for disclosure at the end of May 2024.

1. Introduction

This is the first Monitoring Report on implementation of the Management Action Plan (MAP) related to [Case 2019/01](#) Shuakhevi HPP (45335), covering IPAM monitoring activities in relation to relevant Management actions for the period December 2022 to October 2023.

In July 2018, the Project Complaint Mechanism (PCM) received a Complaint from civil society organisations Green Alternative and CEE Bankwatch Network relating to the [Shuakhevi HPP \(45335\) project](#). Complainants alleged:

- inadequate assessment of potential environmental and social impacts of the Project including ensuring gender equality and proper safeguarding of women as a vulnerable group;
- inadequate monitoring of environmental and social components of the Project;
- inadequate assessment and monitoring of biodiversity conservation and sustainable management of living natural resources, including of biodiversity offset measures, and
- shortcomings in information disclosure and stakeholder engagement, including consultations with Project-affected women in a meaningful way that is inclusive and culturally appropriate.

On 30 July 2019 the Board approved the appointment of Mr. Neill Popovic, as PCM Expert responsible for undertaking the Compliance Review of the Shuakhevi HPP Project in relation to the allegations of non-compliance with the 2008 EBRD Environmental and Social Policy (ESP).

The PCM Expert completed the investigation in March 2021-, and based on the findings of non-compliance, issued 4 project related and 4 systemic recommendations for Bank Management.

In accordance with para. 45 and 46 of the 2014 PCM Rules of Procedure, EBRD Management prepared a Management Action Plan (MAP) to respond to the Expert's findings and recommendations.

The Audit Committee considered the Compliance Review Report and the proposed Management Action Plan on 29 September 2022 and recommended to the Board the approval of the proposed MAP.

The Compliance Review Report and the approved MAP were disclosed on the [IPAM case registry](#) on 19 October 2022 thus initiating the MAP monitoring stage. As per the Project Accountability Policy, the processing of the case from that moment became the responsibility of IPAM.

The IPAM team produced a Monitoring Plan, disclosed in December 2022 on the [IPAM case registry](#).

2. Background

2.1 Compliance Review Findings

As outlined in the [Compliance Review Report](#), the PCM Expert concluded that the Bank had not complied with Performance Requirements (PR) 1, 4 and 6 of the 2008 Environmental and Social Policy as follows:

- The Environmental and Social Impact Assessment (ESIA) and related Project documentation do not clearly and consistently identify the Project's area of influence;
- The Bank did not ensure that an extensive testing programme during excavation works

for the tunnels was set up, including tests to cover rock stability issues and rock behaviour in permanent contact with water, in order to sufficiently mitigate the risk of tunnel collapses.

- It failed to take measures to ensure that the Client avoided or minimised adverse impacts on local water resources, including the establishment of baseline data regarding spring water and validation of inferences and conclusions;
- The Bank's monitoring of AGL's implementation of the BAP did not ensure on an ongoing and consistent basis that the Project was achieving no net loss of biodiversity.

2.2. Compliance Review Recommendations

In response to the findings of non-compliance, the PCM Expert made eight recommendations to the Bank: four that were systemic / procedural in nature, and four others specific to the Project.

Systemic Recommendations:

Recommendation 1.

In order to enhance compliance with PR 1, specifically in relation to the identification of a project's area of influence, the Bank should ensure that project sponsors and the Bank have an agreed common and clear understanding of a project's area of influence, including changes in the area of influence, especially in projects that have a large ecological footprint. This includes making sure that project documents identify the area of influence consistently, both within the Bank and in communications with stakeholders, and that changes in project scope are communicated effectively to affected communities. At the same time, the Bank should recognize, and encourage project proponents to articulate that a given project may affect different communities (and different stakeholders) in different ways, and the Bank should ensure that affected community members, especially vulnerable community members, have adequate opportunities to learn about potential project impacts and provide input to the Bank and project sponsors.

Recommendation 2.

In order to enhance compliance with PR 4, the Bank should ensure that in situations where independent technical experts identify the need for further testing to manage risks in connection with the construction, operation or decommissioning of structural elements or components of a project, Bank Management follows up with the project sponsor to confirm that the recommended testing has occurred within a specified timeline, and that test results are both documented and made available to all interested parties, and acted upon.

Recommendation 3.

In order to enhance compliance with PR 4.16, the Bank should ensure that baselines are established regarding the availability and use of natural resources prior to Project construction and that subsequent review of potential adverse impacts on natural resources is not confined to desktop analysis.

Recommendation 4.

In order to enhance compliance with PR 6.8, the Bank should act expeditiously and decisively if the Bank's monitoring of a client's implementation of a project BAP fails to demonstrate that the

project is achieving no net loss of biodiversity. The Bank must ensure that clients prioritize implementation of the BAP and that they do so in ways the Bank can verify, on a specified timeline, with concrete consequences for failure to comply.

Project-Specific Recommendations

Recommendation 5.

In connection with the Project, the Bank should work with AGL to compile a definitive list of Project-affected communities, including how the Project affects each such community. The Bank should take particular care to obtain input from affected communities, including women and other vulnerable members of those communities.

Recommendation 6.

In connection with the Project, the Bank should work with AGL to ensure public access to the results of geological testing (without disclosing legally protected confidential information), including slake durability tests and to document actions taken by AGL to address the result of such tests.

Recommendation 7.

In connection with the Project, the Bank should work with AGL to arrange a thorough hydro-geological review (or to augment existing reviews) that includes gathering historical information regarding water availability and use, as well as proper validation of inferences and conclusions based on physical analysis, not confined to desktop analysis.

Recommendation 8.

In connection with the Project, the Bank should work with AGL to establish a protocol for systematic biodiversity monitoring and reporting, including timelines and content requirements, which enables AGL, the Bank and other interested parties to determine during all phases of the Project whether the Project is achieving no net loss of biodiversity.

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 19 October 2022. The MAP details 8 actions, 5 of which (Actions 1, 5, 6, 7, 8) require further action and implementation:

Management Action 1: Finalise and disclose the PR1 Guidance Note which clearly stipulates the project definition, associated facilities and the physical scope of projects to be assessed.

Management Action 2: Management will continue to integrate technical and E&S work-streams where appropriate but will maintain specific divisions where established engineering protocols exist. Management routinely convenes meetings and workshops of various experts across the bank (technical, financial and E&S) to review cross-theme working practices such as those discussed in the recommendation. No further action is proposed.

Management Action 3: Management has completed this action in full through the 2014 and 2019 policy iterations and development of guidance notes and establishing good international practice. The collection of baseline information is undertaken on a project-by-project basis and is designed

and implemented by EBRD's clients in consultation with EBRD. No further action is therefore proposed.

Management Action 4: Management commissioned a specialist biodiversity consultancy during the redrafting of PR6 on biodiversity, this assignment included drafting guidance notes and a capacity building exercise, internally to, and externally of, EBRD. A series of good practice notes and guidance manuals have also been released further explaining the application of PR6.

Management Action 5: Ensure that an updated SEP, addressing the recommendations made in the CRR, is made publicly available in both English and Georgian and is being implemented during the operational phase of the Project.

Management Action 6: Ensure that the non-technical position paper on historical rock testing methods is made publicly available in English and Georgian, and that Project-affected people are informed of the possibility of requesting rock testing data.

Management Action 7: Management will provide IPAM with updates on water availability monitoring findings, as well as updates on water availability complaints raised through the grievance mechanism.

Management Action 8: Ensure that the O-BAP is made publicly available in both English and Georgian, and provide IPAM with implementation updates of the O-BAP for inclusion in monitoring reports.

3. Monitoring Report

This report covers the first monitoring period since the approval of the MAP by the Board, from October 2022 to November 2023. During that period, IPAM produced a MAP Monitoring Plan disclosed in December 2022 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, 5, 6, 7 and 8. 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, and based on the actions to be monitored, IPAM requested information from Management, conducted a virtual meeting with a Requester and reviewed the relevant documents submitted for consideration.

Management updates

IPAM engaged with Management from March to October 2023 to get a better understanding of how specific recommendations are being met through the MAP. Management provided IPAM with updates in writing about progress on Actions and related evidence.

Management provided information in relation to the following:

- Action 1: Management reported that the PR1 Guidance note has been publicly disclosed and can be found here: [How to implement our performance requirements \(ebrd.com\)](#). Although “Area of Influence” is no longer referenced in the 2019 ESP, section 3.5.3 provides detailed guidance on the scope of the Environmental and Social Assessment to be undertaken.
- Action 5 (a): confirmation that the SEP is publicly available in both English and Georgian on the Client’s website: see [AGL-SEP-Shuakhevi OP Covid final.pdf](#) and [Final-Draft AGL-SEP-Shuakhevi OP გვერდი.pdf](#);
- Action 5 (b): details of a Social Monitoring Report were completed in September 2022. This confirms that the Operations SEP is up-to-date and tailored to the Project operational activities and impacts, with relevant affected communities being mapped, analyzed and included therein. Since the Operations SEP was first adopted in 2017 (ver. A), AGL has updated it three times (ver. D);
- Action 5 (c): on whether the SEP is being implemented during the operational phase, Management indicated that “the project is in O&M phase so there are no major changes on site and SEP activities are routine. The SEP is the document and the social team is in regular contact with communities but there are no scheduled events or anything, but then [we] wouldn’t expect there to be.” Management also noted that “as the SEP is a living document it will be subject to routine review and occasional update in line with GIP. For now, there are no substantive updates since 2021 to be issued.”²
- Action 6 (a): a non-technical position paper on historical rock testing methods was made

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 Email from Management dated April 26, 2023.

publicly available in English and Georgian: [non-technical-summary-003.pdf \(agl.com.ge\)](http://agl.com.ge/non-technical-summary-003.pdf) and <http://agl.com.ge/new/wp-content/uploads/2023/03/%E1%83%A5%E1%83%90%E1%83%A0%E1%83%97-non-technical-summary-003.pdf>. Management indicated that the CRR finding doesn't relate to the ESP, that the contents of the published paper were intended to be non-technical, and that additional information could be provided by AGL upon request;

- Action 6 (b): as to whether Project-affected people have been informed of the possibility of requesting rock testing data, Management indicated that the availability of rock testing data has been communicated to project affected people via the community info centres, but that confirmation would be obtained from the LESC in the next monitoring report and review of the SEP;
- Action 7 (a): as to updates on water availability monitoring findings, Management indicated that per information from AGL “spring water monitoring has been stopped post construction & rehabilitation phase. During operations phase, no spring water monitoring was being done as it is not relevant;”³
- Action 7 (b): Management confirmed that there were no outstanding grievances related to spring water loss;
- Action 8 (a): details of the O-BAP published on the Client website in both English and Georgian: [Microsoft Word - 0416400 Operation Phase BAP SHPP v3.0 Final 20210909 \(1\).docx \(agl.com.ge\)](http://agl.com.ge/Microsoft%20Word%20-%200416400%20Operation%20Phase%20BAP%20SHPP%20v3.0%20Final%2020210909%20(1).docx) and [http://agl.com.ge/new/wp-content/uploads/2023/03/0416400 Operation-Phase-BAP-SHPP-v3.0 Final translated-1.pdf](http://agl.com.ge/new/wp-content/uploads/2023/03/0416400%20Operation-Phase-BAP-SHPP-v3.0%20Final%20translated-1.pdf);
- Action 8 (b): as regards implementation, Management indicated that outside of the O-BAP, all other PR6 related findings were well summarised in an EHS monitoring report (section 6) and a fish-pass monitoring report both of which were provided to IPAM and which confirm compliance with PR6.

3.2 Requesters' Perspective

IPAM also met virtually with the Requesters' Representative from Green Alternative, to gather his views regarding implementation of the MAP.

During the meeting, the Representative spoke of the local concern about the safety of the dam, sharing a news report with footage of the dam apparently leaking,⁴ notwithstanding a company statement that the leakage was within project design parameters.⁵

He repeated ongoing concerns about a lack of engagement between the Company and the local communities in the immediate vicinity of the dam, with the downstream community of Makhalakidzebi in particular feeling that they are being ignored notwithstanding their safety fears and concerns about damage to their houses being caused by landslides in the vicinity of the dam. He also stated that the Company was not communicating with the Requesters themselves.

³ Email from Management dated March 8, 2023.

⁴ See 1:53-2:11 minutes of the video: <https://www.facebook.com/TvMtavari/videos/752358170235771>

⁵ In Georgian - see: <https://businessformula.ge/News/15609>

The Representative also expressed concerns about the water level of the river Adjaristskali below Didachara Dam which is abnormally low for the summer season when it should be at its highest and may not meet the threshold water levels promised. This had clear implications for fish populations in the river.

In terms of the MAP actions, he was of the view that the SEP was not being properly implemented. He was unaware of the non-technical position paper on historical rock testing methods having been made available. Having read it, he expressed concern that the paper focuses on tunnels only, simply names the number of experts, but provides insufficient clarity or conclusions. He indicated that no request had been made for rock-testing data as yet.

3.3 Monitoring Conclusions

This report covers the first monitoring period, December 2022 to October 2023 and reflects the status of MAP implementation at that time.

In relation to each of the Actions IPAM finds as follows:

- Action 1: Action completed;
- Action 5 (a): Action partially complete. The latest version of the SEP is available in English but not in Georgian. The Georgian language site should be updated accordingly;
- Action 5 (b): Action completed;
- Action 5 (c): Action ongoing. Under the Monitoring Plan SEP implementation is intended to be monitored until December 2025. On the basis of feedback received from the Requester, IPAM is concerned that while formal SEP activities may be being undertaken as required, the concerns of communities such as Makhalakidzebi may not be being adequately attended to. While Management provided reassurance that the SEP was being implemented, it was unable to provide evidence of this. Furthermore, the September 2022 Social Monitoring Report sets out recommendations (section 7.4) to improve the SEP which were supposed to be adopted by AGL, including among others verifying if the list of the affected villages needs any revisions due to the extent of the 2022 flushing impacts, and evidence has not been provided to confirm whether these recommendations have been addressed. IPAM notes that AGL was stated to be further reviewing and updating the SEP at that time. On this basis, IPAM will seek from Management a fuller update on stakeholder engagement for its next monitoring report;
- Action 6 (a): Action partially complete. While a non-technical position paper on historical rock testing methods has been made publicly available in English and Georgian, on examination the paper fails to properly address the issue, which was to provide detail of historical rock testing methods. The non-technical paper does not provide any of this information and simply says “Experts from around the world were involved in reviewing the methodology.” In response to this concern, Management didn’t feel that it could do any more, that “the finding really doesn’t relate to the ESP”, and that people could ask for more information if they wanted to. In light of Management’s undertaking to work with the client to issue a non-technical position paper on historical rock testing methods, IPAM requests that Management convey these concerns about the adequacy of the document to the Client and request that it be reviewed and republished;
- Action 6 (b): Action incomplete. Although Management indicated that the availability of

rock testing data has been communicated to project affected people via the community info centres, this is subject to confirmation from the LESC in the next monitoring report and review of the SEP;

- Action 7 (a): Action ongoing. IPAM notes Management's statement that spring water availability was primarily a concern during construction. Nonetheless, under the Monitoring Plan water availability monitoring is to continue until December 2025;
- Action 7 (b): Action ongoing. Under the Monitoring Plan water availability complaint monitoring is intended to continue until December 2025;
- Action 8 (a): Action completed;
- Action 8 (b): Action ongoing. IPAM acknowledges the findings of EHS monitoring report (section 6) and a fish-pass monitoring report which indicate compliance with PR6. IPAM notes that the monitoring report records that "The most notable trend described in the STA is that of the apparent declines in some fish species..." and that further monitoring is required to establish whether this is due to the project. IPAM will seek further updates from Management on this.

IPAM finds Actions 1, 5 (b) and 8 (a) to be complete. For the next monitoring period IPAM will monitor Management Actions 5 (a), 5 (c), 6 (a), 6 (b), 7 (a), 7 (b), and 8 (b).

The next monitoring report is scheduled for disclosure at the end of May 2024.

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

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.	Finalisation and disclosure of the PR1 Guidance Note	Review the PR1 Guidance note and check if it is disclosed	December 2022	PR1 Guidance Note finalised and disclosed	Completed PR1 guidance published March 2023	
5.	(a) The referred updated SEP is publicly available in both English and Georgian	Check if the updated SEP is publicly available in English and Georgian	December 2022	Confirmed that updated SEP is publicly available in English and Georgian	Partially complete	Most up to date SEP available in English but not Georgian
	(b) The SEP document addresses the recommendations made in the Compliance Review Report	Review the SEP to check if it addresses the recommendations of the CRR	December 2022	SEP reviewed by IPAM which concluded that it addressed the recommendations of the CRR	Completed	Updated SEP addresses the recommendations of the Compliance Review Report
	(c) The SEP is being implemented during the operational phase	Request update from the Management on how the SEP is being implemented, what activities have taken place and what stakeholders are included	Bi-annually, starting in December 2022 and completing in December 2025 ²	Update provided and its summary disclosed in the IPAM monitoring report Local stakeholders confirm participation	Ongoing	Management confirmed current SEP being implemented but contradicted by Requester. No evidence provided on how the SEP is being implemented

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
6.	(a) The non-technical position paper on historical rock testing methods is made publicly available in English and Georgian	Confirm if the position paper is available publicly in English and Georgian	June 2023	The position paper is available publicly in English and Georgian	Partially complete	Paper published but insufficient fails to properly address the issue, which was to provide detail of historical rock testing method
	(b) Project-affected people are informed of the possibility of requesting rock testing data	Request from Management evidence that Project-affected people have been informed about the possibility of requesting rock testing data	June 2023	Notices and messages to Project-affected people provide information about possibility and process of requesting the data	Incomplete	Management indicated that availability of rock testing data has been communicated to Project affected people via the community info centres. This will be confirmed by the LESC in the next monitoring report
7.	(a) Management to provide IPAM with updates on water availability monitoring findings	Request update from Management on water availability monitoring findings	Bi-annually, starting in December 2022 and completing in December 2025	Update provided and its summary disclosed in the IPAM monitoring report	Ongoing	Management indicated that spring water monitoring has been stopped post construction & rehabilitation phase. During operations phase, no spring water monitoring was being done as it is not relevant
	(b) Management to provide IPAM with updates on water availability complaints raised in the grievance mechanism	Request update from Management on water availability complaints raised in the grievance mechanism	Bi-annually, starting in December 2022 and completing in December 2025	Update provided and its summary disclosed in the IPAM monitoring report	Ongoing	No complaints received during the first monitoring period
8.	(a) O-BAP is publicly available in both English and Georgian;	Confirm if the O-BAP is available publicly in English and Georgian	December 2022	O-BAP is available publicly in English and Georgian	Completed	

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
	(b) Implementation updates of the O-BAP are provided to IPAM for inclusion in monitoring reports	Request update from the Management on implementation of O-BAP	Bi-annually, starting in December 2022 and completing in December 2025	Update provided and its summary disclosed in the IPAM monitoring report	Ongoing	Material supplied evidencing compliance with PR6. IPAM notes that the monitoring report records that “The most notable trend described in the STA is that of the apparent declines in some fish species...” and that further monitoring is required to establish whether this is due to the project, and will seek further updates from Management on this