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180MW Wind Power and Battery Energy Storage System, Tsogttsetsii soum, Mongolia

Chapter 12 Stakeholder Engagement

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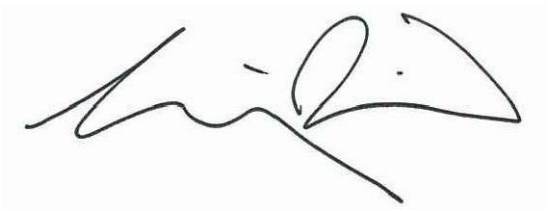
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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AADT	Annual Average Daily Traffic
[redacted]	[redacted]
AIS	Air Insulated Switchgear
ALARP	As Low As Reasonably Practicable
AoI	Area of Influence
APLIC	Avian Powerline Interaction Committee
BESS	Battery Energy Storage System
BMP	Biodiversity Management Plan
BOD	biochemical oxygen demand
CAF	Central Asian Flyway
CAQMP	Construction Air Quality Management Plan
CCRA	Climate Change Risk Assessment
CD	Community Development
CH	Critical Habitat
CHA	Critical Habitat Assessment
CIA	Cumulative Impact Assessment
CIP	Climate Impact Platform
CITES	Convention on International Trade in Endangered Species
CLO	Community Liaison Officer
CMIP6	Coupled Model Intercomparison Project Phase 6
CMS	Conservation of Migratory Species of Wild Animals
CO	Carbon monoxide
COD	chemical oxygen demand
CR	critically endangered
CRM	Citizen’s Representative Meeting
CRM	Collision Risk Model
CSMP	Cold Stress Management Plan

Acronyms	Description
DEIA	Detailed Environmental Impact Assessment
DFID	International Development
DSF	Development Support Fund
E&S	Environmental and Social
EAAA	Ecologically Appropriate Area of Analysis
EAAF	East Asian-Australasian Flyway
EBRD	European Bank for Reconstruction and Development
EC	Electrical Conductivity
EEO	Extent of Occurrence
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EN	Endangered
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ERM	ERM-Hong Kong, Limited
ESA	European Space Agency
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environment and Social Management System
ETI	Ethical Trading Initiative
FERP	Flood Emergency Response Plan
FFDI	Arthur Forest Fire Danger Index
FGD	focus group discussion
FPIC	Free, Prior and Informed Consent
GBV	Gender-based violence
GCD	Global Climate Database
GHG	Green House Gas
GIIP	good international industry practice
GIS	Geographic Information System
GM	grievance mechanism
GPN	Good Practice Note
GRM	Grievance Redress Mechanism
HCO	Bicarbonate
HSEQ	Health, Safety, Environment, and Quality
HSMP	Heat Stress Management Plan

Acronyms	Description
HSS	Health, Safety and Security
HSSE	Health, Safety, Security and Environment
HVAC	Heating, Ventilation, and Air Conditioning
IA	Impact Assessment
IAQM	Institute of Air Quality Management
IBA	Important Bird and Biodiversity Areas
IBAT	Integrated Biodiversity Assessment Tool
IFC	International Finance Corporation
ILO	International Labour Organisation
IMAR	Inner Mongolia Autonomous Region
IPA	Important Plant Areas
ISMP	Invasive Species Management Plan
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Areas
KII	Key Informant Interview
LC	Least Concern
LiDAR	Light Detection and Ranging
LLC	Limited Liability Company
LO	Land Officer
LRP	Livelihood Restoration Plan
LRP	Livelihood Restoration Plan
LVIA	Landscape & Visual Impact Assessment
MCS	Mongolian Consulting Service
MECC	Ministry of Environment and Climate Change
MNS	Mongolian National Standard
MRIA	Mongolian Renewables Industries Association
MRL	Mongolian Red List
MSDS	Material Safety Data Sheet
MW	Mega Watt
MWEA	Mongolian Wind Energy Association
NASA	National Aeronautic Space Administration
NDC	Nationally Determined Contributions
NDC	National Dispatching Centre
NE	not evaluated
NGO	Non-governmental Organization

Acronyms	Description
NH4+	Ammonium
NO2	Nitrogen dioxide
NO2-	Nitrite
NO3-	Nitrate
NOAA	Atmospheric Association
NPTG	National Power Transmission Grid Company
NPTG	National Power Transmission Grid Company
NREC	The National Renewable Energy Centre
NSR	Noise sensitive receiver
NT	Near threatened
NZE	Net Zero Energy LLC
O&M	Operation and Maintenance
OHL	Overhead Transmission Line
OHS	Occupational Health and Safety
OT	Oyu Tolgoi
PA	protected area
PAD	project affected districts
PAPs	Project Affected Persons
PI, mg/L	Phosphate
PM	Particulate matter
POP	persistent organic pollutants
PPA	Power Purchase Agreement
PPE	Personal protective equipment
PS	Performance Standards
RAP	Resettlement Action Plan
RCIA	Rapid Cumulative Impact Assessment
RCS	Real Case Scenario
RILI	rainfall-induced landslide index
RoW	Right of Way
SCADA	Supervisory Control and Data Acquisition
SNH	Scottish Natural Heritage
SO	Social Officer
SO2	Sulphur dioxide
SO4	Sulphate
SPA	Strictly Protected Area

Acronyms	Description
SRTM	Shuttle Radar Topography Mission
STE	Serrated Trailed Edge
TDS	Total Dissolved Solids
TIP	Trafficking in Persons
TL	Transmission Line
TNC	The Nature Conservancy
TOR	Terms of Reference
UNEP	United Nations Environmental Programme
UNFCCC	United Nations Framework Convention on Climate Change
USD	United States dollars
UV	Ultra-violet
VEC	Valued Environmental and Social Components
VP	Vantage Point
VU	Vulnerable
WBG	World Bank Group
WBGT	Wet Bulb Globe Temperature
WCS	Worst Case Scenario
WCS	Wildlife Conservation Society
WHO	World Health Organisation
WPF	Wind Power Farm
WPFW	West Pacific Flyway
WRI	World Resource Institute
WSDI	Warm spell duration index
WTG	Wind Turbine Generator
WWF	World Wide Fund for Nature

12. STAKEHOLDER ENGAGEMENT

This Chapter summarizes the methodology and approach for stakeholder engagement, and the key findings from the activities.

12.1 APPROACH

12.1.1 PURPOSE OF STAKEHOLDER ENGAGEMENT

The specific objectives for stakeholder engagement were to:

- Inform relevant stakeholders about the Project and its planned Project activities;
- Identify stakeholders and communities potentially affected by Project activities;
- Gather baseline information on the social and environmental components; and
- Engage with potentially affected groups to understand potential Project impacts, perceptions and concerns, and discuss appropriate mitigation measures.

12.1.2 STAKEHOLDER ENGAGEMENT PRINCIPLES

The following principles have been identified for driving and guiding the stakeholder engagement activities conducted as part of the ESIA engagements:

- The engagement strategy has been designed and implemented in a manner that is appropriate and cognizant of the specific economic, social, and cultural context of Mongolia;
- Considerations for non-disclosure have been weighed against the need for transparency and stakeholder groups to be informed;
- Engagement has been a two-way dialogue which has involved informing, listening and seeking inputs, as well as sharing and exchanging views;
- Engagement has been free of intimidation and coercion;
- The Project has worked to ensure that it appropriately provides updates to potentially affected and relevant stakeholders. The frequency of these updates have been commensurate to Project risks and any changes to the Project; and
- The Project will provide a grievance mechanism and opportunities to incorporate received feedback into the Project. Project Proponent contact information have been preliminary shared with concerned stakeholders. A grievance mechanism will be disclosed to impacted stakeholders at a later stage.

In summary, the main principles were:

- **Inclusive:** The consultations were organised to ensure representation of potentially affected and interested stakeholders. Separate Key Informant Interviews (KIIs) and Focus Group Discussions (FGDs) were undertaken with women, herders etc.;
- **Sharing of information:** At the bagh level consultations, special emphasis was given to build community level understanding of the Project and all the information was provided in Mongolian; and
- **Participatory:** Stakeholders were encouraged to participate in the consultations and were always given the opportunity to ask questions.

12.2 STAKEHOLDER CHARACTERISATION

This section provides a characterization of the broad stakeholder groups identified for the Project, including:

- Local community;
- Vulnerable people;
- Soum government representatives;
- Bagh government representatives;
- INGOs/ NGOs; and
- Other interested stakeholders/parties

12.2.1 LOCAL COMMUNITY

This group includes community members who may be directly or indirectly affected by the Project's presence and activities as well as their representatives. Key community stakeholders identified and consulted by the Project include:

- Herders – Directly affected by the Project's impacts on livelihoods, land use and community health and safety;
- Women – Directly affected by the Project's impacts on livelihoods, land use and community health and safety; and
- Youth – Directly affected by the Project's impacts on livelihoods, land use and community health and safety.,

The relevant bagh included in stakeholder consultation and considered as affected by the Project is Bilgeh Bagh in Tsogttsetsii soum, as well as Gaviluud Bagh and Javhlant bagh in Khanbogd soum.

12.2.2 VULNERABLE PEOPLE

Stakeholder identification and engagement also seeks to identify any potentially vulnerable or disadvantaged individuals and groups in the impacted communities. According to WHO (2018), vulnerable groups applies to groups of people (children, pregnant women, elderly people, malnourished people, prisoners, migrants and refugees, people who uses drugs, and people who are ill or immunocompromised, etc.) who, due to factors usually considered outside their control, do not have the same opportunities as other, more fortunate groups in society.

Vulnerable groups are those who may be differently or disproportionately affected by the Project, or whose situation may mean that special care is needed to engage them in consultation and information dissemination activities.

Vulnerable groups are defined by the IFC PS in the following way:

"*Vulnerable status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The client should also consider factors such as gender, age, ethnicity, culture, literacy,*

sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources".[1]

Based on the KII with Labor and Welfare Specialist, as well as Social Officer of Tsogttsetsii Soum, the project categorizes vulnerable people using the following criteria in ***Table 12-1.*** The presence of these vulnerable groups within the Project area was identified based on the household (HH) survey conducted in February and June. It should be noted, however, that the identification is not exhaustive, as some households were not available during the survey period.

TABLE 12-1: VULNERABLE GROUP CRETERIA AND IDENTIFICATION

Vulnerable Group	Criteria	Presence in the Project AoI	Impact from the Project
Single-parent households with children aged 0-18	This group refers to single mother-headed households or single father-headed households with children aged 0-18	Not identified	N/A
Seniors	This group refers to people aged 65 years old and above	[redacted]	Nuisances from the Project construction activities
Impoverished people	This group refers to people living below the Mongolia national poverty line	Not identified	N/A
People with disabilities (PwDs)	This vulnerable group includes those with disabilities that affects their ability to gain an income	Not identified	N/A
Households receiving food stamps	This vulnerable group includes those who receive food stamps from the government.	Not identified	N/A
Single-person household	Elderly person who live alone, typically due to the prolong absence or passing of family members	Not identified	N/A
Full and partial orphans	Full orphans refer to children who have lost both parents, while partial orphans refer to those who have lost either their mother or their father	Not identified	N/A

[1] IFC (2012). IFC Performance Standards on Environmental and Social Sustainability. Retrieved from: https://www.ifc.org/wps/wcm/connect/c02c2e86-e6cd-4b55-95a2-b3395d204279/IFC_Performance_Standards.pdf?MOD=AJPERES&CVID=kTjHBzk

12.2.3 SOUM GOVERNMENT REPRESENTATIVES

This group of stakeholders include relevant governmental departments regulating the Project. Soum government representatives have the power to regulate or otherwise influence the Project in terms of establishing policy, granting permits and approvals for the Project, monitoring and enforcing compliance with the applicable rules and regulations and making available the necessary infrastructure and resources for the Project. Engagement with the municipal authorities is expected to fulfil the following objectives:

- Seek clarity on the expectations on stakeholder engagement and informed participation;
- Get necessary permission to engage with government departments at different levels as well as to hold consultations in the AoI, as required;
- Get access to useful data from concerned offices; and
- Get specific contacts of people to meet at the municipal level, as well as necessary instructions.

Key stakeholders at the soum level (Tsogttsetsii soum, Manlai soum and Khanbogd soum) include the following:

- Soum Governor
- Soum Deputy Governor
- Chairman of soum citizens representatives' meeting
- Chairman of Governor Office
- Environmental Officer
- Land Officer
- Social Officer
- Labor and Welfare Officer
- Aimag Governor

12.2.4 BAGH GOVERNMENT REPRESENTATIVES

These stakeholder groups are defined as government representatives at the bagh level who have the power to regulate or otherwise influence the Project. bagh is the smallest administrative unit of a soum in Mongolia. The Bagh governor is elected during public meetings held within the Bagh. The elected governor is then recommended by the Citizens' Representatives' Khural of the Soum and finally appointed by the governor of the Soum. Bagh governors serve for a term of four years[2].

These stakeholders are also storehouses of relevant information both for the impact assessment as well as to help implement management plans. Engagement with the local level administration is aimed at the following:

- Obtain necessary local permissions for meetings;
- Seek an understanding of the specific issues and stakeholder concerns at the local level. For example, information on any important development or conflict could be important intelligence to obtain;
- Obtain bagh level social and environmental data;

[2] Law of Mongolia on Administrative and Territorial Units of Mongolia and their Governance. Available at: https://faolex.fao.org/docs/pdf/mon149651E.pdf

- Provide introductions to key people at the bagh level;
- Provide introductions to representatives of the administration to join; and observe the consultation process; and
- Provide guidance on local security do's and don'ts.

Key stakeholders at the bagh level include the following:

- Governor from Bilgeh bagh, Tsogttsetsii soum
- Governor from Gavilud bagh, Khanbogd soum
- Governor from Javhlant bagh, Khanbogd soum
- Governor from Jargalant bagh, Manlai soum

12.2.5 INGOS/NGOS

This group includes those who may have an interest in the Project and its social and environmental aspects and non-governmental organizations representing their interests. It includes members of the wider public in the district, civil society organizations such as cooperatives, professional associations, cultural groups, and citizens' associations, environmental and social groups, universities, and other academic and research institutions undertaking work relevant to the Project who may have views on the Project or information that will be useful for the assessment of Project impacts. The engagement process has led to the identification of relevant CSOs and NGOs that work with the communities as follows:

- Munkh Nogoon Galba – An NGO involved in external environmental monitoring for Oyu Tolgoi project
- Branch council of the "Mongolian Women's Association" in Javhlant bagh, Khanbogd soum.

12.2.6 OTHER INTERESTED STAKEHOLDERS/PARTIES

Other associations are active in the Project area. It is therefore essential to liaise with such companies/associations in order to reduce and mitigate potential cumulative impacts associated with other activities in the area. The engagement process has led to the identification of relevant associations that work with the communities as follows:

- Tsetsii Wind Farm
- National Power Transmission Grid Company (NPTG)
- Rio Tinto/ Oyu Tolgoi Gold and Copper Mine
- Local media: monthly brochure, local newspaper
- Facebook group

12.3 STAKEHOLDER MAPPING

The following matrix (***Figure 12-1***) will be used to map the stakeholders. The Stakeholder Matrix is a dynamic tool that should be periodically updated as and when interest and/or influences of each stakeholder changes over the Project implementation period. Depending on the level of interest and influence of the stakeholder, it is placed into one of the four quadrants. Each group of stakeholders requires different engagement strategies. This is a preliminary mapping and can be revised as the Project progresses into later stages of stakeholder engagement. The main factors taken into account when identifying stakeholders are:

- Their attitude towards the project as measured by the extent to which the stakeholder will "back" (support) or "block" (resist);
- Their influence/power or ability to influence. This may be measured according to their potential to influence others, derived from their position or resource power, or may be their actual influence derived from their credibility as a leader or expert; and
- Their interest in the Project as measured by the extent to which they will be active or passive.

Key stakeholders will be then categorized and analysed according to their influence and interest in the Project and classified into four (4) groups to determine management actions: Informing, Collaborating, Monitoring and Engaging (***Figure 12-1***). Depending on the results of the mapping, engagement strategies will be suggested specifically to each group. This includes:

- **Collaborate/manage closely** (high power/high interest): The stakeholders should be managed closely. This includes regular engagement and consultation;
- **Inform/Keep satisfied** (high power/low interest): The stakeholders should be engaged and consulted on issues of interest;
- **Engage/Keep informed** (low power/high interest): The stakeholders should be kept informed and should be consulted on key interest areas; and
- **Monitor** (low power/low interest): The stakeholders should be monitored and kept informed about the Project (e.g., through factsheets and media notifications).



FIGURE 12-1: STAKEHOLDER MAPPING MATRIX

12.4 METHODOLOGY

12.4.1 STRUCTURE OF THE MEETINGS

The stakeholder engagement activities were structured as follows:

- **Introduction and information disclosure:** Introduce the Project Proponent, the ESIA process, the proposed stakeholder engagement process, the potential environmental and social impacts and mitigations and the process of grievance mechanism to help the stakeholders understand the Project and NZE's intentions for engagement;
- **Question and answer session:** Stakeholders in the meetings are encouraged to raise concerns, comments or ask questions to which the Client and the consultant can directly respond; and
- **Data collection:** Collection of more in-depth information through Key informant interviews (KIIs) / FGDs with key stakeholder groups in the local communities.

Based on the present understanding of the Project and the stakeholders and the purpose of engagement, the following methods of engagement have been conducted for stakeholder engagement/consultation:

- **Key Informant Interviews:** Interviews have been conducted with government officials and key informants like village leaders. These have been guided by a set of open-ended and close-ended questions.
- **Focus Group Discussion**: A FGD refers to a discussion carry out from a similar background/profile on a specific topic while being guided by a moderator. The primary purpose of such discussions is to gather an insight into the thought process of the group concerning a particular issue. FGDs have been undertaken with herders, women, households and bagh governors in the Project area.

All information collected was summarized and confirmed with stakeholders at the end of the discussions. Stakeholders were also given time to share their concerns and views and any further clarifications they required at the end of the meetings. All queries raised by the stakeholders were responded to and noted to feed into the impact assessment process for the ESIA.

12.4.2 SELECTION OF PARTICIPANTS

Participants for Key Informant Interviews (KIIs) and Focus Group Discussions (FGDs) were identified through a purposive sampling approach. Selection was carried out according to the following criteria, agreed upon with the Aimag, Soum, Bagh governor or community leader:

- Relevance to the project's area of influence;
- Knowledge of local socio-economic conditions;
- Direct or indirect exposure to project impacts; and
- Representation of key demographic groups (women, herders, youth, vulnerable households).

For KIIs, individuals were selected because they hold:

- Administrative roles (soum/bagh officials);
- Sectoral responsibilities (health, education, social welfare and development policy and planning etc.); and

- Community leadership positions (bagh governors, herder group leaders, women's group representatives).

For FGDs, participants were selected through:

- Soum and Bagh-level announcements through direct phone calls, local community Facebook groups;
- Coordination with local authorities;
- Direct outreach to ensure inclusion of women, youth, and herders; and
- Participation is voluntary-based, with no incentives offered.

12.4.3 USAGE OF TOOLS

Tools to support and document the engagement process are shown in ***Table 12-2.***

TABLE 12-2: TOOLS USED FOR STAKEHOLDER CONSULTATIONS DURING ESIA PHASE

Checklists/Tools	Purpose
Presentation	Approximately 20-25 slides which include information on Project Proponent, information on the Project activities and timeline, potential impacts and mitigation, and contacts details.
Handout	A handout containing a summary of the information provided in the presentation. An introduction to Project Proponent, including an overview of the Project activities and timeline; Explain scoping findings and purpose of the ESIA; A summary of the potential impacts and proposed mitigation measures; and Contact information for comments, concerns or questions.
FGD	A list of questions has been prepared for the following groups: Herders group: questions tailored to main animals which herders' raise, herd size and quality, key challenges for herders, grazing land locations, main season for grazing and the distance that herder usually go, etc. Women group: women's main activities, participation in community meetings, key source of income, migration, livelihood, employment, etc. Household: questions on livelihoods and income, facilities in the bagh and key concerns regarding the Project. Bagh governors: questions for bagh governors on population and demographics, village facilities, utilities, livelihood and income.
KII	A list of question including key sources of livelihoods, development initiatives, key challenges for the communities, concerns on the Project has been prepared for the government representatives and community leaders.
Maps and other visual tools	Maps that show the Project location, biodiversity and social receptors and the surrounding environment were used during the meetings to discuss herders' main settlement and grazing area.

As the Project progresses, these documents should be reviewed and updated for each round of engagement. All communication materials for the Project will be prepared in Mongolian.

12.5 SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES

In the context of this Project, formal public consultation meeting with local communities could not be conducted due to the high mobility of herders who constitutes the majority of the population. Consequently, Project information was disclosed, and stakeholder concerns and recommendations were gathered through alternative stakeholder engagement methods,

including household(HH) surveys, Key Informant Interviews (KIIs) and Focus Group Discussions (FGDs).

12.5.1 SCOPING STAKEHOLDER ENGAGEMENT

Scoping Stakeholder Engagement activities took place in September 2024 and February 2025 that included Project information sharing and a Q&A session for local authorities and communities to share their views and concerns on the Project. During the engagement, a two-page handout was also distributed.

Table 12-3 and ***Table 12-4*** provides an overview of stakeholders engaged, purpose and approach of engagement and main discussions of each engagement activity undertaken during the scoping phase.

TABLE 12-3: ENGAGEMENT ACTIVITIES UNDERTAKEN DURING SCOPING STAGE 2024

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
10 September 2024 Tsogttsetsii soum	Tsogttsetsii Chairman of the Citizens' Representative	• Male: 1 •	• Present information of the Project • Obtain permission and approval required to conduct engagement in the soum and baghs	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** Key Informant Interview (KII)	• Stakeholder suggested that misinformation was spread on the soum's Facebook group about the Project and that they need to be addressed promptly. • Stakeholder expressed concerns on construction dust, and wind turbines' impact on animals and the environment. • Stakeholder asked questions about the Project location and timeline. • Stakeholder expressed concerns about the impact on environment and community health of the investigation activities. • Stakeholder stressed the importance of clear communication with the local community of the Project information.
10 September 2024 Tsogttsetsii soum	Tsogttsetsii Statistical Officer	• Male: 1 •	• Present information of the Project	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination.	• ERM requested the soum's socio-economic statistical data.

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
			• Obtain secondary data for the study area	***Tools:*** KII	
10 September 2024 Tsogttsetsii soum	Tsogttsetsii Environmental Inspection Officer	• Female: 1	• Present information of the Project	***Approach:*** • Consultation • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectation for clear Project timeline and location, and clear communication. • Stakeholder suggested the Client to present the Project at Bagh Citizens' Representative Meeting that happens twice a year. • ERM requested soum's biodiversity and ecology data.
10 September 2024 Tsogttsetsii soum	Herders' household	• Male: 3 • Female: 1	• Present information of the Project	***Approach:*** • Consultation • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder inquired about the installed equipment for research purpose, Project information, land permission status and climate impact of wind turbines. • Stakeholder expressed concerns about environmental and safety impact of the Project investigation activities. • Stakeholder emphasized the

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
					importance to communicate with all impacted households with clear and accurate information.
12 September 2024 Dalanzadgad. Umnugobi Aimag	Head of Division of Natural Resources Monitoring, Department of Environment and Tourism, Umnugobi Aimag	• Female: 1	• Present information of the Project	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed concerns about the environment impact of the wind turbines.
12 September 2024 Dalanzadgad, Umnugobi Aimag	Head of development policy, planning and investment division; Power specialist	• Male: 2 •	• Present information of the Project • Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder mentioned the development of Aimag Land Management Plan and suggested that the Project be included in the Plan. • Stakeholder suggested that herders should be prioritized for engagements. • Stakeholder mentioned that the Province Governor's Four-Year Program will be developed and disclosed after election.
12 September 2024 Dalanzadgad, Umnugobi Aimag	Umnugobi Aimag Meteorology and the Environmental Monitoring Department	• Male: 1 •	• Present information of the Project	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination.	• Stakeholder mentioned excessive rain in 2024, a dzud in 2023 and common

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
			• Obtain secondary data for the study area	***Tools:*** KII	dust storm in the springs. • ERM requested meteorology data of the region.





FIGURE 12-2: KII WITH UMNUGOBI AIMAG AUTHORITIES

TABLE 12-4: ENGAGEMENT ACTIVITIES UNDERTAKEN DURING SCOPING STAGE 2025

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
10 February 2025 Tsogttsetsii soum	Tsogttsetsii Head of Citizen's Representative Meetings, Land Officer, Social Worker, as well as Labor and Welfare Specialist.	• Male: 2 • Female: 2	• Present the Project, ESIA process, engagement activities, potential impact and proposed mitigation measures and contact information for comments, concerns or questions • Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • Group Meeting	• Stakeholder expressed support for the Project. • Stakeholder expressed expectations for NZE to arrange CSR programs directly with the community. • Stakeholder expressed expectations for NZE to inform the local community about the positive impact of renewable energy.
10 February 2025 Tsogttsetsii soum	Tsogttsetsii Head of Citizen's Representative Meetings	• Male: 1 •	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectations for NZE to inform the local community about the positive impact of renewable energy.
10 February 2025 Tsogttsetsii soum	Tsogttsetsii Land Officer	• Female: 1	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and	• ERM requested land use

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
				• Information Dissemination. ***Tools:*** KII	information of the soum.
10 February 2025 Tsogttsetsii soum	Tsogttsetsii Social Officer	• Female: 1	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed support for the project.
10 February 2025 Tsogttsetsii soum	Tsogttsetsii Labor and Welfare Specialist	• Female: 1	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectations for NZE to have clear communication with the local stakeholders. • Stakeholder expressed expectations for NZE to increase job opportunities locally. • Stakeholder expressed expectations for NZE's support on programs aimed at orphans.

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
11 February 2025 Bilgeh Bagh	Herders of Bilgeh bagh	• Male: 3 • Female: 4	• Present the Project, ESIA process, engagement activities, potential impact and proposed mitigation measures and contact information; and • Gather comments, concerns or questions	***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** Focus Group Discussion (FGD)	• Stakeholder expressed expectations for NZE to have clear communication with the local stakeholders. • Stakeholder expressed expectations for NZE to provide job opportunities for local community.
11 February 2025 Bilgeh Bagh	Women of Bilgeh bagh	• Female: 6	• Present the Project, ESIA process, engagement activities, potential impact and proposed mitigation measures and contact information; and • Gather comments, concerns or questions	***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** FGD	• Stakeholder expressed expectations for NZE to have clear communication with the local stakeholders. • Stakeholder expressed expectations for NZE to establish grievance mechanism for local communities to express concerns.

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
12 February 2025 Khanbogd Soum	Khanbogd Soum Governor, Deputy Governor, Land Officer, and Secretariate of Citizens' Representative Meeting	• Male: 3 • Female: 1	• Present the Project, ESIA process, engagement activities, potential impact and proposed mitigation measures and contact information for comments, concerns or questions • Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** Group Meeting	• Stakeholder expressed expectations for NZE to share clear and accurate information with the local community. • Stakeholder expressed safety concerns about the OHL.
12 February 2025 Khanbogd Soum	Khanbogd Soum Land Officer	• Female: 1	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectations for the Project to meet the soum's electricity demands.
12 February 2025 Khanbogd Soum	Khanbogd Soum Deputy Governor	• Male: 1	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectations for the Project to meet the soum's electricity demands. • Stakeholder expressed expectations for clear and accurate information

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
					sharing with all stakeholders and at the bagh meeting.
12 February 2025 Khanbogd Soum	Herders of Gavilud bagh	• Male: 1 • Female: 7	• Present the Project, ESIA process, engagement activities, potential impact and proposed mitigation measures and contact information; and • Gather comments, concerns or questions	***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** FGD	• Stakeholder expressed expectations for NZE to have clear communication with the local stakeholders. • Stakeholder expressed concerns about the wind turbines disturbing the livestock.
12 February 2025 Khanbogd Soum	Women of Javhlant bagh	• Female: 3	• Present the Project, ESIA process, engagement activities, potential impact and proposed mitigation measures and contact information; and • Gather comments, concerns or questions	***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** FGD	• Stakeholder expressed expectations for the Project to meet the soum's electricity demands and lower electricity price. • Stakeholder expressed expectations for clear information sharing with

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
					the local stakeholders.
13 February 2025 Khanbogd Soum	Governor of Gavilud Bagh	• Male: 1 •	• Present the Project, ESIA assessment steps, potential impact and mitigation measures, field trip schedule and contact information • Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed concerns about the negative environmental and social impact of the Project. • Stakeholder expressed expectations for clear and timely information sharing with all local stakeholders.
14 February 2025 Manlai Soum	Manlai Soum Deputy Governor, Environmental officer, Social Policy Worker, and Land Officer	• Male: 2 • Female: 2	• Present the Project, ESIA process, engagement activities, potential impact and proposed mitigation measures and contact information for comments, concerns or questions • Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** Group Meeting	• Stakeholder expressed support to the Project. • Stakeholder expressed expectations for clear and timely information sharing with all local stakeholders. • Stakeholder expressed concerns of the

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
					Project's impact on birds.
14 February 2025 Manlai Soum	Deputy Governor of Manlai Soum	• Male: 1 •	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectations for clear and timely information sharing. • Stakeholder expressed support for the Project.
14 February 2025 Manlai Soum	Manlai Labor and Welfare Specialist	• Female: 1	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectations for clear and timely information sharing.
14 February 2025 Manlai Soum	Manlai Land Officer	• Female: 1	• Obtain secondary data for the study area	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** KII	• Stakeholder expressed expectations for clear and timely information sharing. • Stakeholder expressed support for the Project.



FIGURE 12-3: KII WITH SOUM GOVERNORS



FIGURE 12-4: FGD WITH WOMEN AND HERDERS

12.5.2 ESIA STAKEHOLDER ENGAGEMENT

ERM conducted the ESIA stakeholder engagement in June 2025. The purpose of the ESIA stakeholder engagement was to present updated Project information, the process of ESIA study, ESIA Stakeholder Engagement Plan, Project's potential impact and proposed mitigation measures, grievance contact, and the next steps.

Table 12-5 provides an overview of stakeholders engaged, purpose and approach of engagement and main discussions of each engagement activity undertaken during the ESIA phase.

TABLE 12-5: ENGAGEMENT ACTIVITIES UNDERTAKEN DURING ESIA SITE VISIT JUNE 2025

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
18 June 2025, Tsogttetsii soum governor's office	Soum governor, Deputy Governor, Land Officer and Environmental Inspector of Tsogttetsii soum	• Male: 2 • Female: 2	• Present updated Project information; • Present ESIA baseline results; • Present Project's impact and proposed mitigation measures; • Present concerns raised during previous stakeholder engagement activities and responses; and • Present grievance contact and Mechanism	***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** • Group Meeting	• Stakeholders inquired about the updated Project information and timeline. • Stakeholders inquired about the land use status of the Project. • Stakeholders inquired about the Project's impact on the environment and wildlife. • Stakeholders inquired about the access road of the Project.
18 June 2025, Tsogttetsii soum governor's office	Soum governor of Tsogttetsii soum	• Male: 1 •		***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** • KII	• Stakeholder requested the Project to be introduced at the Bagh citizen's meeting in August.
19 June 2025, Khanbogd soum governor's office	Soum Governor, Environmental Inspector, Land Officer of Khanabogd soum; and Gaviluud bagh governor	• Male: 2 • Female: 2		***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** • Group Meeting	• Stakeholders inquired about the upgrade of the access road of the Project. • Stakeholders highlighted the protected area in Gaviluud bagh.
19 June 2025, Khanbogd soum	Gaviluud Bagh Governor	• Male: 1 •		***Approach:*** • Consultation; and	• Stakeholders inquired about the Project's research status.

Date and Location	Stakeholders	Gender distribution of participants	Purpose of Engagement	Approach/Tools	Summary of Discussions
				• Information Dissemination. ***Tools:*** • KII	• Stakeholders expressed concerns about the degradation of pasture land. • Stakeholders highlighted the importance to listen to herders' feedback.
19 June 2025, Khanbogd soum	Soum Governor of Khanbogd soum	• Male: 1 •		***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** • KII	• Stakeholders inquired about the updated Project information and timeline. • Stakeholders highlighted the protected area in Gaviluud bagh crossed by the TL.
19 June 2025, Khanbogd soum	Land Officer of Khanbogd soum	• Female: 1		***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** • KII	• Stakeholders highlighted the protected area in Gaviluud bagh crossed by the TL.
20 June 2025, Manlai soum governor's office	Soum Governor, Jargalant Bagh Governor and Environmental Inspector	• Male: 3 •		***Approach:*** • Consultation; and • Information Dissemination. ***Tools:*** • Group Meeting	• Stakeholders provided information of certain households. • Stakeholders expressed concerns for birds collision. • Stakeholders inquired about the upgrade of the access road of the Project.

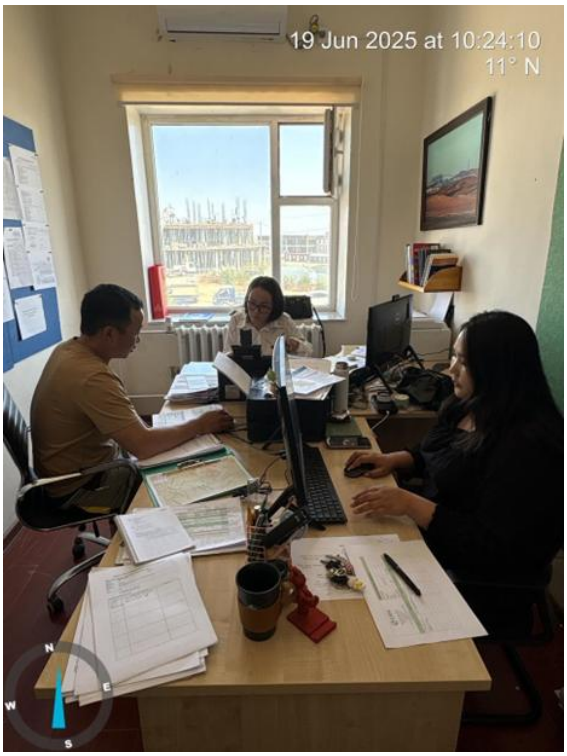


Meetings with Tsogttsetsii soum officials and officers



Meetings with Khanbogd soum officials and officers





Meetings with Khanbogd soum officials and officers

FIGURE 12-5: STAKEHOLDER ENGAGEMENT IN JUNE 2025FURTHER OF STAKEHOLDER ENGAGEMENT ACTIVITIES

12.5.3 SUMMARY OF KEY CONCERNS AND ESIA CONSIDERATIONS

TABLE 12-6: KEY CONCERNS AND EXPECTATIONS RAISED BY COMMUNITY AND ESIA CONSIDERATION

Concerns/Expectations	ESIA Consideration
Land Use	
Concerns about degradation of pasture land	Land degradation and land use impact of the Project are assessed in ***Section 7.7.5.1*** and ***Section 8.5.4.2*** respectively. Mitigation measures are proposed accordingly.
Livelihood	
Concerns about the wind turbines' disturbance to the livestock	Project's potential impact on livelihood are assessed in ***Section 8.3.4.2.*** and mitigation measures are proposed as required.
Health and Safety	
Stakeholder expressed safety concerns about the OHL	Impact of transmission line snapping and transmission pylon collapse is assessed in ***Section 9.3.5.*** Mitigation measures are proposed accordingly.
Stakeholder Engagement	
Stakeholder expressed expectations for NZE to have clear communication with the local community	A Stakeholder Engagement Plan (SEP) has been developed for the Project to plan the engagement activities with the community throughout the Project lifecycle.
Stakeholder expressed expectations for NZE to establish grievance mechanism for local communities to express concerns	GRM has been included in the SEP for the for the community to report grievances.
Stakeholder expressed expectations for NZE to inform the local community about the positive impact of renewable energy	Positive impact of the Project has been assessed in ***Section 8.3.4.2*** of the ESIA Report.
Biodiversity	
Concerns for birds collision	Impact for bird collision with the wind turbines during operation phase is assessed in ***Section 7.7.5.2.*** Mitigation measures are proposed accordingly.

12.6 FURTHER STAKEHOLDER ENGAGEMENT ACTIVITIES

12.6.1 PRE-CONSTRUCTION PHASE ENGAGEMENT

One (1) round of engagement is recommended to be conducted one month before construction starts to inform stakeholders about the status of the Project, including the timeline of construction, and to provide updates on any concerns raised by the community during the ESIA Stakeholder Engagement. The consultation will then be followed by a Q&A session, which will allow participants to express their views and concerns regarding the upcoming Project and compensation process. The consultations will be organized to ensure that identified vulnerable people including women can attend meetings and express their views.

During the pre-construction phase, the main objective of the stakeholder engagement activities includes, but is not limited to:

- Project Timeline;
- Disclosure of International ESIA, including project potential impact and proposed mitigation measures;
- Grievance contact, Mechanism and monitoring activities;
- Disclosure of Project workforce/labour management to include local workforce requirement and recruitment process;
- Provision of information on the construction activities i.e., schedule/progress to the nearest affected communities in advance; and
- Regular coordination and reporting to the relevant government agency related to the implementation of environmental and social management and monitoring plan.

Stakeholders may also submit comments and any grievance by email or in writing to the contact point below:

- Contact Person: [redacted] (Community Liaison Officer)
- Contact Number: [redacted] (Work phone)
- Email: [redacted] (Work email)

The disclosure of the final ESIA findings, which will represent the first completed description of project impacts and proposed mitigation actions to be made available to the community, will therefore take place as part of pre-construction phase engagement. Following the information dissemination period, the finalized ESIA report will be translated to the local language and will be made publicly available at the NZE office at 8th floor, Shangrilla Office, Olympic Street 19A, SBD - 1 khoroo, Ulaanbaatar and bagh governor's offices in Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh. Similarly, a copy of the report will be uploaded to the Project website. Multi-channel disclosure such as Non-Technical Summary (NTS), posters, radio, and noticeboards, etc. should be made accessible to the affected communities.

A tailored engagement strategy should be established with the vulnerable groups to include the following:

- Create safe and convenient environment by offering small group or individual consultations;
- Information should be disclosed in accessible formats, including sign language interpretation or written materials for those with hearing difficulties, and audio formats for visually impaired participants;
- Schedule meetings at convenient hours;
- Select barrier-free venues, or conduct home-based visits for those unable to travel;
- Provide transportation assistance for people with mobility challenges; and
- Provide refreshment as required.

The proposed approach is presented in ***Table 12-7***.

TABLE 12-7: PROPOSED STAKEHOLDER ENGAGEMENT DURING PRE-CONSTRUCTION PHASE

No	Stakeholder	Purpose of Engagement	Approach/Tools	Responsibility	Timeline
1	Bagh government representatives: • Governor from Bilgeh bagh; • Governor from Gavilud bagh; • Governor from Javhlant bagh; and • Governor from Jargalant bagh	• Share Project description, key entities involved and timeline; • Share potential environmental, health and social impacts and the proposed mitigation measures, in particular potential impact to community health and safety and socio-culture; • Inform Project's commitment to environmental and social management and monitoring; • Consult stakeholders on concerns and views regarding final ESIA findings; • Communicate Grievance Mechanism and key NZE personnel that will have responsibility for consultation and grievance management; • Share Information related to construction activities, including but not limited to type of work; duration of work; transportation and accessibility; and number of workers involved; and • Share Risk and safety awareness during Project construction.	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • Face-to-Face Meetings	• NZE Community Liaison Officer • NZE E&S Manager • EPC Contractor Community Liaison Officer	• One month before construction commencement
2	Local community • Herders from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh; • Women from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh; and • Youth from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh	• Share Project description, key entities involved and timeline; • Share potential environmental, health and social impacts and the proposed mitigation measures, in particular potential impact to community health and safety and socio-culture; • Disclose to communities the planned share of local unskilled and semi-skilled	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • FGDs.		

No	Stakeholder	Purpose of Engagement	Approach/Tools	Responsibility	Timeline
3	• Vulnerable people: Single-parent households, senior, unemployed people, impoverished people, persons with disabilities, households receiving food stamps, individuals living alone after forming a household, and full and partial orphans.	labour, the eligibility criteria, and the full recruitment process as early as possible; • Inform the benefit of renewable energy; • Consult stakeholders on concerns and views regarding final ESIA findings; • Communicate Grievance Mechanism and key NZE personnel that will have responsibility for consultation and grievance management; • Share Information related to construction activities, including but not limited to type of work; duration of work; transportation and accessibility; and number of workers involved; and • Share risk and safety awareness during Project construction.	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • FGDs.		

12.6.2 CONSTRUCTION PHASE AND ESIA DISCLOSURE

After obtaining local regulatory approval, the construction phase will start (indicatively scheduled on Q2 2026) and is expected to start operation in Q1 of 2028. Activities during the construction phase will include obtaining broad stakeholder opinions, disclosing updated Project information, as well as communicating and implementing an effective grievance mechanism for communities. Consultation and disclosure at this stage will allow the potential impacts and proposed actions for the Project to be put on record and allow for questions and answers to alleviate concerns and build understanding. The brief introduction of the grievance process will have been previously communicated; however, further updates will be presented to reach a broader number of people.

Stakeholder consultation during the Project construction phase is key to maintaining the good relationships the Project has established with the affected people/stakeholders identified. The affected people may first experience the social/community health impacts during the construction phase, particularly due to noise, which may potentially change their daily activities and livelihoods for those who reside in the immediate vicinity of the construction site. During the construction phase, the main objectives of the stakeholder engagement activities include, but are not limited to:

- Grievance redressing and monitoring activities;
- Disclosure of Project workforce/labour management to include local workforce requirements and recruitment processes;
- Provision of information on the construction activities, i.e., schedule/progress to the nearest affected communities in advance; and
- Regular coordination and reporting to the relevant government agency related to the implementation of environmental and social management and monitoring plans.

The consultations will be organized to ensure that identified vulnerable people, including women, can attend meetings and express their views. ***Table 12-8*** presents a summary of the proposed stakeholder engagement during the construction phase of the Project.

TABLE 12-8: PROPOSED STAKEHOLDER ENGAGEMENT DURING CONSTRUCTION PHASE

No	Stakeholder	Purpose of Engagement	Approach/Tools	Responsibility	Frequency
1	Soum government representatives in Tsogttsetsii soum, Manlai soum and Khanbogd soum: • Soum Governor • Soum Deputy Governor • Chairman of soum citizens representatives' meeting • Chairman of Governor Office • Environmental Officer • Land Officer • Social Officer • Labor and Welfare Officer	• Share Project description, key entities involved and timeline; • Share potential environmental, health and social impacts and the proposed mitigation measures, in particular potential impact to community health and safety and socio-culture; • Inform Project's commitment to environmental and social management and monitoring; • Consult stakeholders on concerns and views regarding final ESIA findings; • Communicate Grievance Mechanism and key NZE personnel that will have responsibility for consultation and grievance management; • Share Information related to construction activities, including but not limited to type of work; duration of work; transportation and accessibility; and number of workers involved; and • Share Risk and safety awareness during Project construction.	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • Face-to-Face Meetings; and • Regular reports.	• NZE Community Liaison Officer • NZE E&S Manager • EPC Contractor Community Liaison Officer	• Monthly for the first six months and peak construction period. • Quarterly after peak construction period.
2	Bagh government representatives: • Governor from Bilgeh bagh; • Governor from Gavilud bagh; • Governor from Javhlant bagh; and • Governor from Jargalant bagh		***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • Face-to-Face Meetings; and • Regular reports.		
3	INGOS/NGOS • Gobi Oyu Development Support Fund (DSF) • Gobi Soil, Khanbogd, Mongolia		***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • FGDs		
4	Local community • Herders from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh;	• Share Project description, key entities involved and timeline; • Share potential environmental, health and social impacts and the proposed	***Approach:*** • Consultation; • Collaboration; and		

No	Stakeholder	Purpose of Engagement	Approach/Tools	Responsibility	Frequency
	• Women from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh; and • Youth from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh	mitigation measures, in particular potential impact to community health and safety and socio-culture; • Inform the benefit of renewable energy; • Consult stakeholders on concerns and views regarding final ESIA findings; • Communicate Grievance Mechanism and key NZE personnel that will have responsibility for consultation and grievance management; • Share Information related to construction activities, including but not limited to type of work; duration of work; transportation and accessibility; and number of workers involved; and • Share risk and safety awareness during Project construction.	• Information Dissemination. ***Tools:*** • FGDs; and • Public announcement through mass media, internet, poster, etc.		
5	• Vulnerable people: Single-parent households, senior, unemployed people, impoverished people, persons with disabilities, households receiving food stamps, individuals living alone after forming a household, and full and partial orphans.		***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • FGDs; and • Public announcement through mass media, internet, poster, etc.		

12.6.3 OPERATION PHASE

During the operation phase of the Project, stakeholder engagement activities will focus on obtaining broad stakeholder opinions, disclosing updated Project information, and effectively communicating and implementing a grievance mechanism for local communities. Consultation and disclosure at this stage will allow potential impacts and proposed actions of the Project to be documented and provide opportunities for questions and answers to alleviate concerns and build understanding. The brief introduction of the grievance process will have been communicated previously; however, further updates will be presented to ensure a broader reach. The consultations will be organized to ensure that identified vulnerable individuals, including women, can attend meetings and express their views.

The objectives of stakeholder engagement during the operation phase of the Project are to provide updates on the progress of the Project's operations, maintain constructive relationships with any groups and communities impacted by the Project, maintain constructive relationships with government stakeholders and other interested parties, maintain awareness of environmental and safety practices in the local communities, especially regarding emergency preparedness and response, manage concerns and complaints from stakeholders, particularly from the local community, provide information on environmental and social impact mitigation measures and monitoring results, in line with relevant government approvals, and monitor community attitudes towards the Project.

Stakeholder consultation during the Project operation phase is key to maintaining the good relationships the Project has established with the affected people/stakeholders identified. During the operation phase, the main objectives of the stakeholder engagement activities include, but are not limited to:

- Grievance redressing and monitoring activities;
- Updated information on the operation activities; and
- Regular coordination and reporting to the relevant government agency related to the implementation of environmental and social management and monitoring plan if there is any.

Table 12-9 presents a summary of the proposed stakeholder engagement during the operation phase of the Project.

TABLE 12-9: PROPOSED STAKEHOLDER ENGAGEMENT DURING OPERATION PHASE

No	Stakeholder	Purpose of Engagement	Approach/Tools	Responsibility	Timeline
1	Aimag government representatives: • Governor of Umnugobi aimag • Deputy Governor of Umnugobi aimag • Chairman of Governor's office • Chairman of Umnugobi aimag citizens representatives' meeting • Chairman of Social Policy Department • Chairman investment, Development Policy and Planning Department	• Share Project development, impacts and opportunities; and • Inform the Implementation plan of environmental and social management and monitoring • Inform Project's social investment/ local economic and community development or CSR program (if any).	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • Face-to-Face Meetings; and • Regular reports.	• NZE Community Liaison Officer • NZE E&S Manager	• During operation phase when necessary
2	Soum government representatives in Tsogttsetsii soum, Manlai soum and Khanbogd soum: • Soum Governor • Soum Deputy Governor • Chairman of soum citizens representatives' meeting • Chairman of Governor Office • Environmental Officer • Land Officer • Social Officer • Labor and Welfare Officer				

No	Stakeholder	Purpose of Engagement	Approach/Tools	Responsibility	Timeline
3	Bagh government representatives: • Governor from Bilgeh bagh; • Governor from Gavilud bagh; • Governor from Javhlant bagh; and • Governor from Jargalant bagh		***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • Face-to-Face Meetings; and • Regular reports.		
4	INGOS/NGOS • Gobi Oyu Development Support Fund (DSF) • Gobi Soil, Khanbogd, Mongolia		***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • FGDs		
5	Local community • Herders from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh; • Women from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh; and • Youth from Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh	• Share the validation of any grievances raised; • Share risk and safety awareness during Project operation (such as ice/blade throw, shadow flicker and noise impact); • Provide options for grievance resolution; • Inform the progress on grievance resolution process and close out; • Disclosure Project monitoring results and performance reporting; and • Disclose emergency preparedness information.	***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • FGDs; and • Public announcement through mass media, internet, poster, etc.		
6	• Vulnerable people: Single-parent households, senior, unemployed people, impoverished people, persons with disabilities, households receiving food stamps, individuals living alone after		***Approach:*** • Consultation; • Collaboration; and • Information Dissemination. ***Tools:*** • FGDs; and		

No	Stakeholder	Purpose of Engagement	Approach/Tools	Responsibility	Timeline
	forming a household, and full and partial orphans.		• Public announcement through mass media, internet, poster, etc.		

12.7 GRIEVANCE MECHANISM

12.7.1 GRIEVANCE MECHANISM FOR PROJECT AFFECTED COMMUNITIES

IFC PS 1 requires a grievance mechanism (GM) to be developed early in the Project, as it applies to diverse aspects of the Project's relationship with stakeholders, and enables the proponent to respond better, as a measure to pre-empt rather than react to escalation of issues or tensions with surrounding communities. The GM is to be developed with input from both NZE and stakeholders to ensure it is fit for purpose. It will identify who will receive grievances from affected communities, how and by whom will they be resolved, who will keep a written record of such grievance process and how will the response be communicated back to the complaint. An overview of the Grievance Mechanism will be translated into Mongolian for sharing with affected communities.

The following key elements will be considered in establishing an appropriate grievance mechanism to support the management of project impacts and risks, as summarized from the IFC Good Practice Note on Addressing Grievances from the Project Affected Communities (2009):

- Ensuring proportionality;
- Ensuring cultural appropriateness;
- Ensuring accessibility;
- Ensuring transparency and accountability to all stakeholders; and
- Ensuring appropriate protection by encouraging the communities to share their concerns freely.

12.7.2 COMMUNICATION OF THE GRIEVANCE MECHANISM

The Project is required to communicate and disclose the mechanism via formal and informal meetings and discussions as well as via the non-technical summary. It will also prepare promotional materials, such as an informative flyer, that can be presented on public information boards and around the Project site.

- The following information can be communicated and disclosed by the Project:
- Who can raise complaints (focusing on affected communities);
- Where, when, and how community members can log complaints;
- Who is responsible for receiving and responding to complaints, and if any external parties can receive complaints from communities;
- What type of responses complainants can expect from the Project including timing of responses; and
- The benefits that complainants can receive from using the grievance mechanism.

It is essential that the local government in Bilgeh bagh, Gavilud bagh, Javhlant bagh and Jargalant bagh (and all contractors and employees) fully understand the grievance mechanism, to enable them to communicate the step-by-step process to the affected people, particularly in the case where the grievances are submitted directly to them for resolution.

12.7.3 PROCESS OF GRIEVANCE MECHANISM

The proposed process and stages of grievance mechanism to be undertaken by the Project is presented in ***Table 12-10***.

TABLE 12-10:SUMMARY OF GRIEVANCE HANDLING

Phases	Description	Responsibility	Timeline
Receipt of Grievance	• Feedback or complaints should be allowed to be submitted via email, WhatsApp or through face-to-face interactions phone calls for illiterate and elderly individuals; • Anonymous grievances can be lodged via unmarked written forms, anonymous drop-boxes, phone or messaging platforms without providing personal details, or third-party intermediaries. • All communications are subject to the feedback process, which ensures that feedback is documented, incorporated, and responded to as needed. • When the grievance is identified, the grievance procedure is initiated.	Community Liaison Officer	-
Record/ Delegate	• When a grievance is identified, it is officially registered in a grievance log (see *Appendix C* in SEP for a template of grievance log form and register) and given a unique identification number. • It is categorized based on the type of complaint and its severity. Grievances are categorized into two (2) categories: ° Low significance grievance, with characteristics: – The complaints involve individual affected people only; – One-off grievance, less probability it will attract media attention; and – Does not require immediate intervention from managerial level ° High significance grievance, indicated by the following conditions: – Cases of Gender-Based Violence (GBV) and Sexual Exploitation, Abuse, and Harassment (SEAH); – The complaints involve a large group of affected people; – Has not been resolved during the time specified in this mechanism – Recurring and potentially affecting the Project activities schedule; – Potentially attracting media attention; and – Requiring immediate intervention from managerial level. • An initial response is sent to the person(s) who raised the grievance within three (3) working days, acknowledging their feedback and describing the next steps in the grievance process, time estimated for these steps and a contact person. • The issue will be delegated to relevant unit/department to be followed up.	Community Liaison Officer	3 days after the receipt of grievance

Phases	Description	Responsibility	Timeline
Investigation	• The Project will investigate grievances and their surroundings in a timely manner. Investigations may include photographs and other evidence, witness statements, interviews with affected stakeholders and other parties, review of site register, and other information gathering activities; • Any grievances related to GBV, SEAH or serious physical injury must be categorized as critical or high significance and requires a survivor-centred approach, which often involves 24 hour response time and strict confidentiality protocols; • All anonymous grievances will be recorded, screened, and investigated with the same level of rigor as named grievances; and • The results of the investigation will be reviewed and a resolution will be proposed. The development of the resolution may involve consultation with the person(s) involved. The proposed resolution will then be formally communicated to all parties.	Community Liaison Officer and/or Grievance Redress Officer	• 6 days • Extended timeline by another 15–30 working days for complex cases
Resolution or Appeal	• If the resolution is accepted by all parties, it will be documented, implemented and the grievance is closed. • If the resolution is not accepted, it will be reconsidered and the following resolution may be proposed: ◦ If complainant is not satisfied with the proposed resolution either party resorts to a mediator / arbitrator; ◦ Mediator / Arbitrator then reviews the grievance and seeks resolution; ◦ Mediator / Arbitrator then propose resolution; ◦ The mechanism must not prevent the affected parties from seeking legal remedies; ◦ If both parties are satisfied with the proposed resolution it will be documented, implemented and the grievance is closed; ◦ If both parties are not satisfied with the proposed resolution, then the complainant or Project will resort to the courts. • In terms of selection of the mediator/arbitrator, the Project committed that: ◦ Mediation process will follow the Law of Mongolia on Mediation. ◦ In the event of an unresolved grievance, either party may engage a certified mediator through the Judicial General Council of Mongolia. This process is entirely voluntary and confidential. To ensure neutrality, the mediator is a legally certified third party with no affiliation to the project. ◦ While court-annexed mediation involves a standard state stamp duty, the project is committed to exploring free-of-charge community-based mediation for local stakeholders to ensure zero financial barriers to justice.	Community Liaison Officer and HSE Manager	• 6 days • Extended timeline by another 15–30 working days for complex cases

Phases	Description	Responsibility	Timeline
Feedback/ Close out	• After the accepted resolution has been implemented, it will be monitored and its effectiveness will be evaluated. All parties will be notified that the resolution has been implemented and will have the opportunity to provide feedback on the grievance process and its implementation.	Community Liaison Officer and HSE Manager	15 days

12.7.4 RESOURCES FOR GRIEVANCE MECHANISM

The IFC Good Practice Note on Addressing Grievances from the Project Affected Communities (2009) indicates the importance of the Project resources such as staff, infrastructure, and finances as determining factors in shaping a grievance mechanism.

The Project has committed to appointing a Grievance Redress Mechanism (GRM) Team to be responsible for the grievance mechanism under the Stakeholder Engagement and Community Development (CD) Division. It include the following staffs:

- *Coordinator*: having a function as a liaison person to maintain strategic partnerships with the local community, local government, and other related stakeholders;
- *Officer*: dedicated staff to conduct on ground consultations especially with the affected vulnerable groups, processing feedback, and if appropriate, involvement in the Project community development program to ensure on-going positive community relations; and

The Project proponent and Contractor's appointed personnel will receive grievances, conduct fact finding investigations to establish a clear picture of the circumstances surrounding a particular grievance, as well as identify and communicate follow-up actions, through to resolution.

12.7.5 INFORMED PARTICIPATION OF PROJECT GRIEVANCE MECHANISM

The Project has and will continue to inform the mechanism via formal and informal meetings and discussions as well as via the non-technical summary (NTS). It will also prepare promotional materials that can be presented on public information boards and around the Project site.

The following information will be informed by the Project:

- Who can raise complaints (focusing on affected communities);
- Where, when, and how community members can log complaints;
- Who is responsible for receiving and responding to complaints, and if any external parties can receive complaints from communities;
- What type of responses complainants can expect from the Project including timing of responses; and
- The benefits that complainants can receive from using the grievance mechanism.

It is essential that the local government (and all contractors) also fully understand the mechanism to enable them to communicate the step-by-step process to the project affected people, particularly in the case where the grievances are submitted to them for resolution.

12.7.6 MONITORING AND REPORTING

NZE will monitor the grievance process through a grievance register that records all incoming complaints. Monthly reports should detail the status of grievances, analysis of grievance trends, recurrent issues, lesson learnt and corrective actions submitted by the CLO to the relevant department heads. Grievances that remain open for more than 30 days will be escalated to the Project Director for intervention. This grievance management procedure will undergo a review every two years or following significant changes in the structure or operational model of NZE to ensure ongoing relevance and effectiveness.

12.7.7 EPC CONTRACTOR GRIEVANCE MECHANISM ROLES AND RESPONSIBILITIES

The EPC Contractor plays a key role in supporting NZE's Grievance Mechanism (GM) by ensuring effective communication, documentation, and resolution of grievances related to the project's activities. The responsibilities of the EPC Contractor concerning the GM include:

- Awareness and Training: Ensure that all EPC personnel are aware of the GM procedures and trained to recognize, respond to, and document grievances raised by community members;
- On-Site Grievances: Designate a grievance focal point within the EPC Contractor team to serve as the primary contact for receiving and addressing grievances related to construction activities from workers and communities;
- Documentation and Reporting: Collaborate with the Community Liaison Officer (CLO) to maintain accurate records of grievances received, investigations conducted, and resolutions implemented, if any. This documentation must be submitted regularly to NZE to keep the grievance register up to date; and
- Mitigation of Grievances: Implement measures to prevent grievances related to construction activities, such as minimizing noise, managing dust, and ensuring the safety of local residents near work sites.

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