

Mongolia: Choir-Sainshand Transmission Line

Stakeholder Engagement Plan (SEP)

June 2021



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Contents

Chapter	Page
Acronyms and abbreviations	5
1. Introduction	8
1.1. Background	8
1.2. SEP Objectives	8
1.3. SEP Scope	8
1.4. SEP Contents	8
1.5. General Approach to Disclosure of Information	9
2. Project Description	10
2.1. Introduction	10
2.2. Project Context	10
2.3. Project Location	10
2.4. Project Entities	12
2.5. Project Description	12
2.6. Establishment of the Right of Way	14
2.7. Land Acquisition	14
2.8. Design Optimisation	15
2.9. Ancillary Facilities	15
2.10. Project Phases	16
3. Stakeholder Engagement and Information Disclosure Requirements	17
3.1. Introduction	17
3.2. National Requirements	17
3.3. EBRD Requirements	19
3.4. Gaps between National and EBRD Requirements	21
4. Stakeholder Identification and Engagement Methods	22
4.1. Introduction	22
4.2. Approach to Stakeholder Identification	22
4.3. Stakeholder Identification and Analysis	23
4.4. Vulnerable Groups	25
4.5. Methods of Communication	26
5. Stakeholder Engagement	31
5.1. Introduction	31
5.2. Ongoing Engagement Goals	31
5.3. Stakeholder Engagement Phases	31
5.4. NPTG Stakeholder Engagement	32
5.5. ESIA Engagement	32
6. Future Stakeholder Engagement Programme	40
6.1. Introduction	40
6.2. Stakeholder Engagement Program	40
7. Grievance Mechanism	51
7.1. Introduction	51
7.2. Grievance Policy	51
7.3. Grievance Mechanism	51
7.4. Grievance Procedure - Steps	52
7.5. Disclosure of the Grievance Procedure	55

7.6. Managing and Tracking Grievances	55
8. Monitoring	57
8.1. Introduction	57
8.2. Key Performance Indicators	57
8.3. Key Monitoring Activities	57
8.4. Review and Revision of this Plan	58
9. Audit and Reporting	59
9.1. Auditing	59
9.2. Stakeholder Engagement and Grievance Database	59
9.3. Reporting	59
9.4. Record-Keeping	60
10. Resources and Responsibilities	61
10.1. Introduction	61
10.2. Key Roles and Responsibilities for SEP Implementation	61
Appendices	62
Appendix A. Interview Questions	63
Appendix B. Project Grievance Form	64
Appendix C. Grievance Register Template	66
Appendix D. Stakeholder Register Template	68
Appendix E. Minutes of Meeting Template	70

Tables

Table 2-1. RoW for transmission lines in Mongolia	14
Table 2-2. Project phases and activities	16
Table 4-1. Project elements and relevant administrative areas	22
Table 4-2. List of stakeholders	23
Table 4-3. Stakeholder consultation methods	26
Table 4-4. Key engagement methods used and proposed	28
Table 5-1. ESIA stakeholder engagement summary	32
Table 5-2. Stakeholders engaged with during ESIA scoping phase	33
Table 5-3. Summary of stakeholder issues	34
Table 5-4. Key stakeholder engagement during the Baseline Engagement phase	35
Table 6-1. Stakeholder Engagement Programme	43
Table 9-1. Key Performance Indicators	57
Table 9-2. Monitoring measures	58
Table 11-1. Key Roles and Responsibilities	61

Figures

Figure 2-1. Project location	11
Figure 2-2. Map Project <i>aimags</i> (provinces) and Choir and Sainshand cities	11
Figure 2-3. Location of the substations	12
Figure 2-4. Main types of pylons to be used for the Project	13
Figure 2-5. Foundations of Y220-2 Anchor pole (top) and P220-2 Intermediate poles (bottom)	14
Figure 7-1. Grievance Procedure	53

Acronyms and abbreviations

Acronym / Abbreviation	Description
Aimag	<i>Mongolian</i> Eng. Capital city
Aol	area of influence
AP	Affected person
Bagh	<i>Mongolian</i> Eng. District
BSRDG	Baganuur and South-Eastern Region Power Distribution Grid
CBOs	Community-Based Organisations
CES	Central Energy System
CRETG	Central Regional Transmission Grid
CLO	Community Liaison Officer
DC	Direct Current
DEIA	Detailed Environmental Impact Assessment
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESP	Environmental and Social Policy
EU	European Union
FB	Facebook
FGD	Focus Group Discussion
FS	Feasibility Study
GEIA	General Environmental Impact Assessment
GIP	Good International Practice
GPS	Global Positioning System
GRM	Grievance redress mechanism
HH	Household
HGVs	Heavy Goods Vehicle
Hural	<i>Mongolian</i> Eng. Parliament
IBA	Important Bird Area
IPAM	Independent Project Accountability Mechanism
KII	Key Informant Interview
km	kilometre
KPI	Key Performance Indicator
kV	kilovolt
LARF	Land Acquisition and Resettlement Framework
LARP	Land Acquisition and Resettlement Plan
m	metres
MET	Ministry of Environment and Tourism
MNS	Mongolian National Standard

MVA	mega volt ampere
NGOs	Non-Governmental Organisations
NPTG	National Power Transmission Grid
OHTL	Overhead transmission line
O&M	Operation and Maintenance
PIU	Project Implementation Unit
PV	Photovoltaic
PWD	People with disabilities
PR	Performance Requirement
RoW	Right of Way
SEA	Sustainability East Asia LLC
SEP	Stakeholder Engagement Plan
SEPKPI	Stakeholder Engagement Plan Key Performance Indicator
SME	Small and medium enterprise
SMS	Short Message (or Messaging) Service
Soum	<i>Mongolian</i> Eng. County
TL	Transmission line
VRE	Variable Renewable Energy
UNECE	United Nations Economic Commission for Europe

1. Introduction

1.1. Background

The European Bank for Reconstruction and Development (EBRD) is considering providing a sovereign loan to the Government of Mongolia to finance the construction of a 220.2 kilometre (km) double circuit 220 kilovolt (kV) overhead transmission line (OHTL) between Choir and Sainshand and construction of a new 220/110/35 kV substation in Sainshand and the extension of 220 kV Choir substation (hereafter referred to as the Project). The Client will be the Ministry of Energy. The National Power Transmission Grid State Owned Joint Stock Company (the Company or NPTG), a state-owned power transmission utility, may be the implementing entity and will operate the Project.

The EBRD has categorised the Project as “A” in relation to its 2014 Environmental and Social Policy (ESP), which means that a comprehensive Environmental and Social Impact Assessment (ESIA) is required, including the preparation of a Stakeholder Engagement Plan (SEP). The EBRD has commissioned WS Atkins International (Atkins), with their sub-consultants, Sustainability East Asia LLC (SEA) to undertake the ESIA and prepare the ESIA Disclosure Package to EBRD requirements.

This document presents the SEP in accordance with EBRD’s Performance Requirement (PR)10 *Information Disclosure and Stakeholder Engagement* and the EBRD’s ESP 2014.

The SEP will be used as a basis for the development of more detail information dissemination and consultation plans and procedures by the Client and their Contractors respectively, prior to the start of construction.

1.2. SEP Objectives

The objectives of this SEP are to:

- Outline the applicable standards with regards to effective stakeholder engagement;
- Identify stakeholders and their interests and/or issues of concern;
- Identify the stakeholder engagement that has been undertaken to date and additional engagement undertaken to meet EBRD PR10;
- Ensure a systematic approach to future stakeholder engagement that will help build and maintain a constructive relationship with stakeholders;
- Ensure that appropriate environmental and social information is disclosed and meaningful consultation is held with Project’s stakeholders and, that feedback provided through the consultation is taken into consideration;
- Define roles and responsibilities for stakeholder engagement activities and outline how engagement will be integrated across the Project;
- Define monitoring and reporting procedures; and
- Provide a grievance management mechanism through which stakeholder concerns are captured and responded to in a constructive and timely manner.

1.3. SEP Scope

In accordance with the objectives above, the SEP aims to document the stakeholder engagement activities and results to date, as part of a broader framework to guide and document stakeholder engagement during the Project’s subsequent phases of construction and operation. It covers the engagement undertaken as part of the ESIA to meet EBRD ESP 2014 and sets out the approach to the construction and operation phases of the Project.

1.4. SEP Contents

This SEP is set out as follows:

- Section 2- Project description: project location and characteristic, design and phases of the Project;
- Section 3- Stakeholder engagement and information disclosure requirements: EBRD and national requirements;
- Section 4- Stakeholder identification: approach to and identification of stakeholders;

- Section 5- Stakeholder engagement: approach to and results of engagement undertaken as part of the ESIA;
- Section 6- Future stakeholder engagement programme: future stakeholder disclosure and stakeholder engagement programme;
- Section 7- Grievance mechanism: grievance redress mechanism (GRM) and GRM procedure and timeframe;
- Section 8- Monitoring: KPIs and monitoring measures and reporting;
- Section 9- Audit and Reporting: reporting requirements; and
- Section 10- Resources and responsibilities: roles and responsibilities for developing and implementing the SEP.

1.5. General Approach to Disclosure of Information

The EBRD considers information disclosure and stakeholder engagement as an on-going process which should be started at the earliest stage of Project preparation and should be continued during its implementation. Consequently, this document is a 'living' resource to be referenced and updated prior to construction and operation; as well as periodically to reflect the continuously evolving stakeholder engagement requirements, practices and outcomes of the Project and/or changes in Project design and activities throughout the Project lifecycle.

This SEP has been prepared by Atkins and SEA as part of the ESIA, in accordance with the following EBRD policies:

- EBRD ESP (2014), particularly PR10;
- EBRD Public Information Policy (2014);
- Meaningful Stakeholder Engagement: A joint publication of the Multilateral Financial Institutions Group on Environmental and Social Standards (2019); and
- Covid-19 EBRD Briefing Note on Stakeholder Engagement.¹

This SEP will be disclosed by the EBRD as part of the ESIA package Disclosure Documents to meet EBRD PR10 requirements for Category A projects.

¹ Available at: <https://www.ebrd.com/covid19-consultation.pdf>.

2. Project Description

2.1. Introduction

The Project has been identified as the top priority project from the Ministry of Energy and is covered in the Ministry's 2013 Feasibility Study (FS)² which looked at a wider transmission project, the Choir-Sainshand-Zamyn Uud transmission line and necessary substations, of which the proposed Project is a significant part. Since 2013, a technical review of the FS has been undertaken by the EBRD Technical Consultants, Mercados Aries International, and reported in a Draft and Second Interim Progress Report.³

2.2. Project Context

The Project is based on the Government's Action Plan since 2008 and the approved State Policy on Energy for 2015-2030 has outlined the priority areas and strategic goals for Mongolian power sector that can be divided into three main groups aimed at improvement of efficiency, safety, and environment protection. Among the goals to be achieved are the following:

- Support innovation and advanced technology in energy sector, and implement conservation policy;
- Ensure energy safety and reliable supply;
- Develop mutually beneficial cooperation with regional countries; and
- Increase the production share of renewables and reduce negative environmental impact from traditional power generation and greenhouse gases.

The Policy envisages an increase of renewable energies share in generation up to 30% during 2024-2030. Rich in renewable energy resources, Mongolia has a viable alternative to coal-based power plants, which currently represent around 96% of the country's power generation pool. The role of a developed, stable and safe Transmission Grid in the achievement of these goals is crucial and the existing transmission network has to be updated in order to meet the challenges of the power sector modernization, as the Mongolian transmission network currently suffers from underinvestment with old and inefficient infrastructure and limited capacity to absorb additional power from new sources, especially Variable Renewable Energy (VRE) sources like Photovoltaic (PV) and Wind power plants.

2.3. Project Location

The location of the Project is shown in Figures 2-1 to 2-3. The Project starts at an existing substation in Choir (297069 E; 5134973 N), in the main city of Govi-Sumber *aimag* (province). The OHTL will run from this substation in a southeast direction to finish at a new 220/110/35 kV substation approximately 2.5 km north of the existing substation in the city of Sainshand (436771 E; 4975142 N), the capital of Dornogovi *aimag*. In general, the OHTL route is sparsely populated and has vegetation characteristics of the Gobi Desert. The OHTL will run in the vicinity of the settlements of Sumber and Shiveegovi *soums* (districts) in Govi-Sumber *aimag* and Dalanjargalan, Airag, Saikhandulaan, Altanshiree and Sainshand *soums* in Dornogovi *aimag*.

The Asian Highway 3 and the Trans-Mongolia railway run between the cities of Choir and Sainshand to the east of the OHTL. There is an existing 110 kV OHTL which follows the road between Choir and Sainshand. There are also 35 kV distribution lines within the settlements along the road between Choir and Sainshand, and in Choir and Sainshand cities. Shivee-Ovoo coal mine, approximately 11 km to the east of the OHTL in Shivee-Govi *soum* in Govi-Sumber *aimag*, is one of the key coal suppliers to the central economic zone of Mongolia. The nearest national park is Choiriin Bogd Mountain, approximately 27 km to the northeast. Ikh Nart, also a national park and an Important Bird Area (IBA), is approximately 10 km southwest of the OHTL route, in Dalanjargalan *soum* of Dornogovi *aimag*.

² Ministry of Energy 2013. *Choir-Sainshand-Zamyn-Uud 220 kV Overhead Transmission Line Feasibility Study*.

³ Mercados Aries International (22 May 2020), *Project Preparation Study for the Construction of the CHOIR-SAINSHAND Transmission Line, Mongolia – Inception Report*. Mercados Aries International (30 September 2020), *Project Preparation Study for the Construction of the CHOIR-SAINSHAND Transmission Line, Mongolia – 2nd Interim Progress Report*.

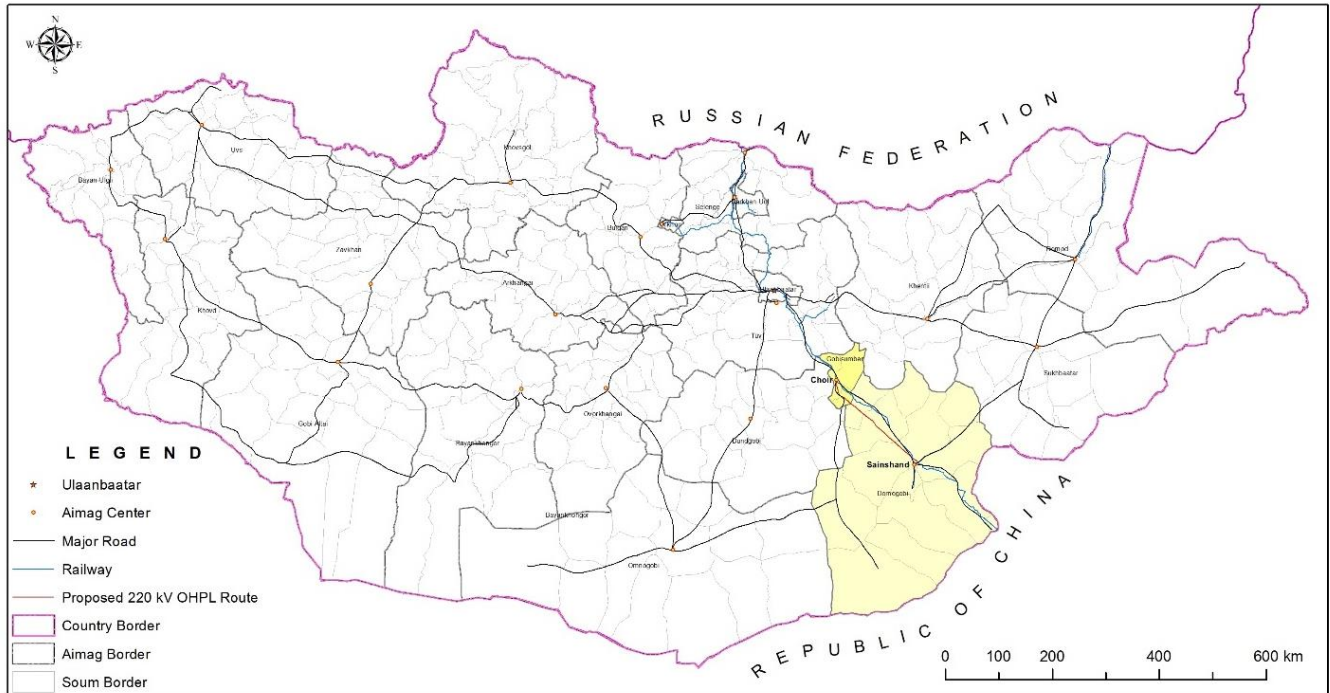


Figure 2-1. Project location

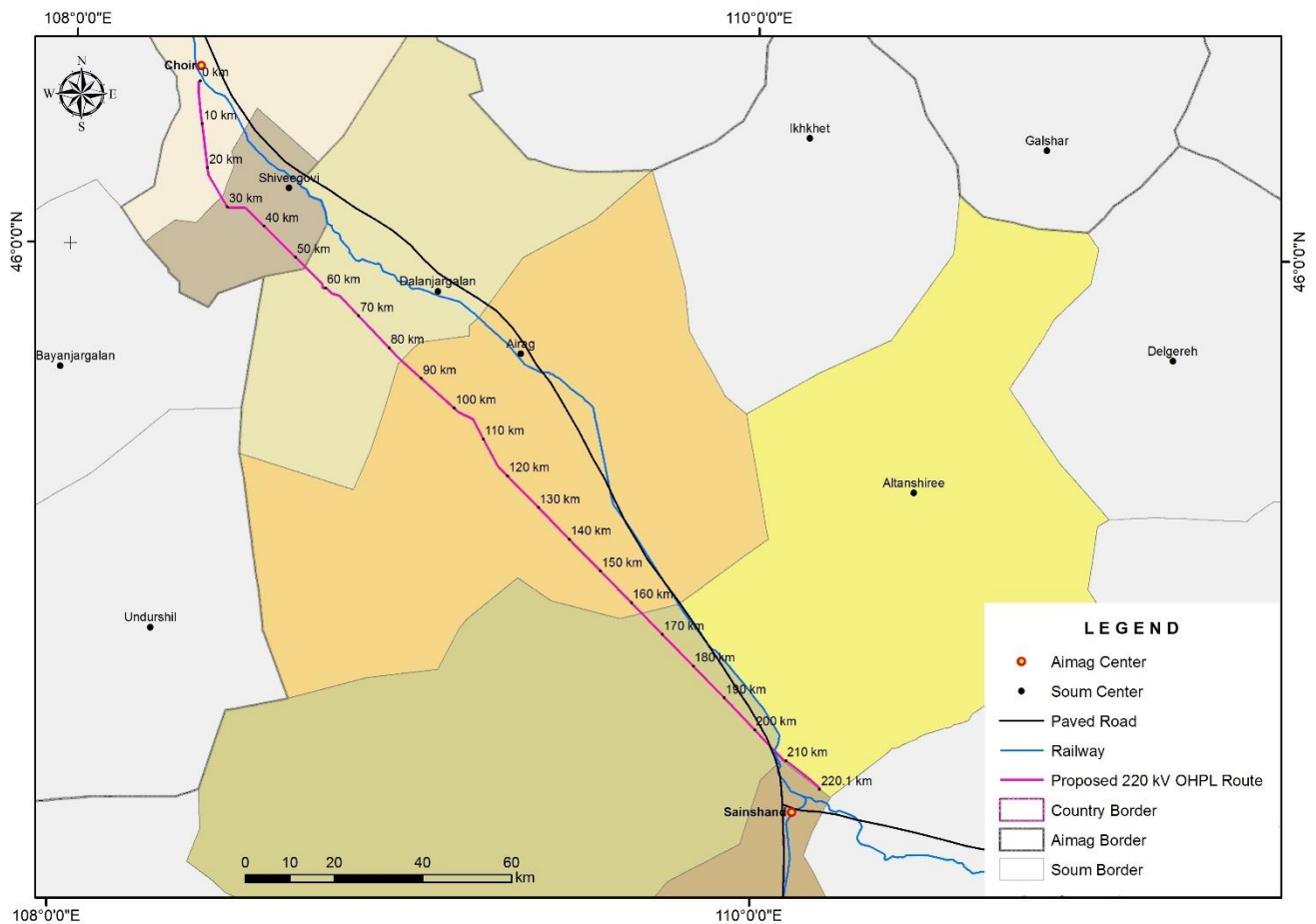


Figure 2-2. Map Project aimags (provinces) and Choir and Sainshand cities

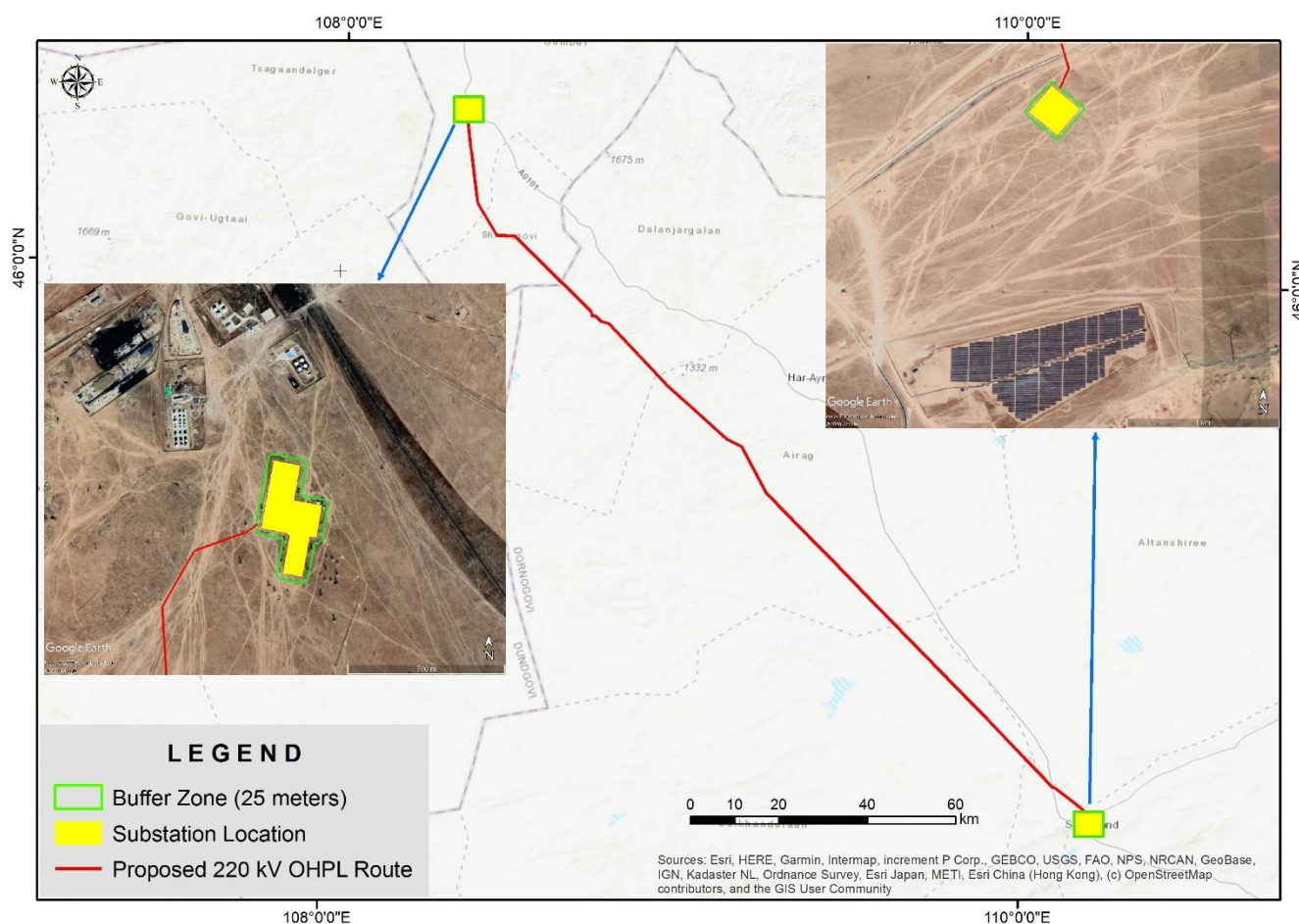


Figure 2-3. Location of the substations

2.4. Project Entities

The Ministry of Energy will be the Client. The NPTG will be the operator and may be the implementing body. The NPTG, was established in 1967 under the former Energy Authority. In 2001, the Government of Mongolia officially established the Central Regional Transmission Grid (CRETG) State Owned Joint Stock Company (JSC), which in 2012 was renamed as NPTG. NPTG's shareholders are the Ministry of Energy (70%) and Government Agency for Policy Coordination on State Property (30%).

NPTG operates within the Central Energy System (CES), which covers electricity supply to 80% of the total territory of the country and 72% of the total population. The Company's main business activity is to provide operational, maintenance, installation, performance testing and regime adjusting services for substations and electricity transmission lines with a voltage level of 220 kV, 110 kV and small length of 35 kV line.

The Project lies within the Baganuur and South-Eastern Region Power Distribution Grid (BSRDG). Once constructed the Project will supply electricity to the BSRDG within the broader CES.

2.5. Project Description

The Project comprises the following main components:

- **Transmission line.** 220.2 km 220 kV double circuit overhead line will be constructed between the planned new substation in Sainshand and the existing substation in Choir. The OHTL will use LGJ-400/50 conductor wires and optical ground wire, OPGW-09A4 for lightning protection and system operation. This circuit will have no tee off connections at any point and will help to improve availability within Choir and Sainshand.
- **Pylons.** The double circuit OHTL will be supported by a combination of twin steel poles in a portal formation with lattice towers where longer spans are required. It is planned that a total of 663 pylons will be used, using five different types of pylon (P220-2, Y220-2, Y220-2+5, Y220-2+9, Y220-2+14). The P220-2 intermediate poles and Y220-2 anchor poles will be predominantly used (Figure 2-4).

Optimisation of the overhead line design, to be undertaken by the Construction Contractor, may identify other areas where lattice towers could be employed. The P220-2 and Y220-2 pylons foundations will have depths of 2.2 m and 3.2 m with corresponding widths of 12.2 m and 5.7 m, respectively (Figure 2-5).

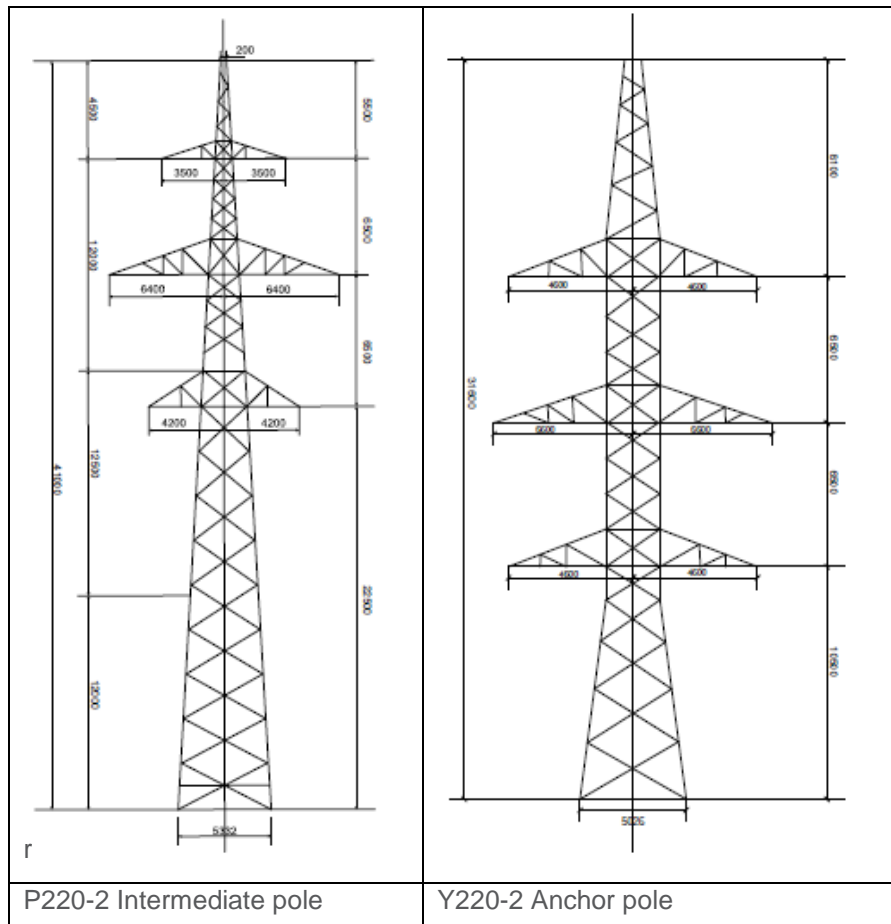


Figure 2-4. Main types of pylons to be used for the Project

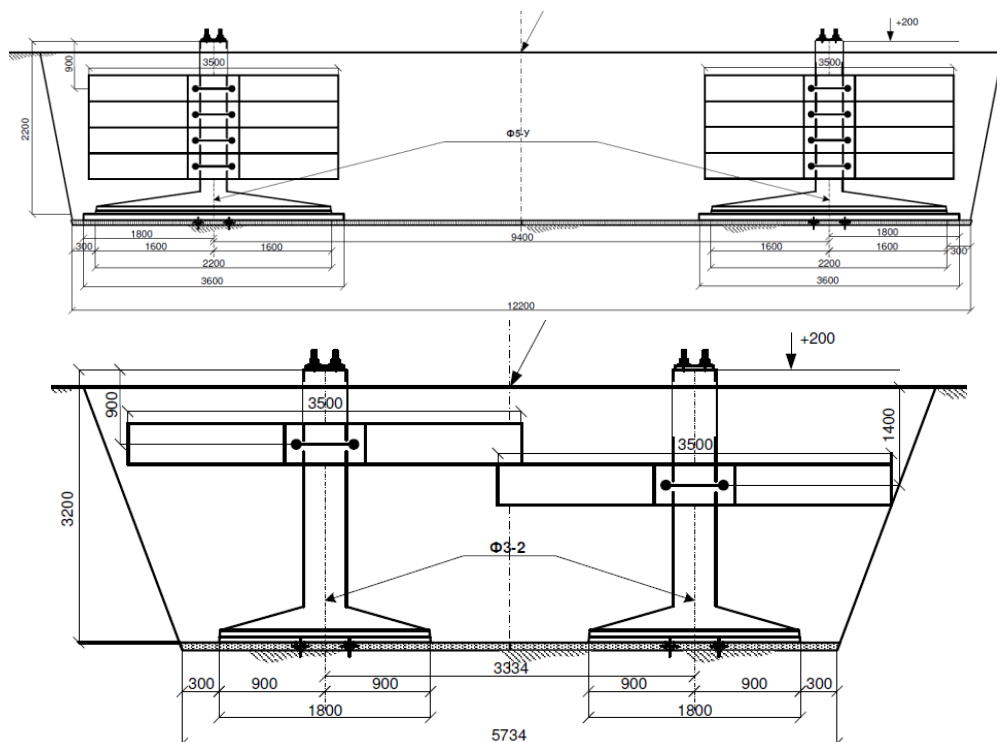


Figure 2-5. Foundations of Y220-2 Anchor pole (top) and P220-2 Intermediate poles (bottom)

- **Substations.** The existing substation in Choir will be extended. A new 220/110/35 kV substation will be built in Sainshand as part of the Project. The Sainshand substation characteristics and facilities are as follows:⁴
 - Two set of 220/110/35 kV autotransformers with 200 mega volt ampere (MVA) capacity;
 - 220 kV distribution equipment;
 - 110 kV distribution equipment;
 - 35 kV distribution equipment;
 - Transformer for internal use;
 - 0.4 kV distribution equipment;
 - Direct Current (DC) system;
 - Cables;
 - Lighting;
 - Lightning rod;
 - Control system;
 - Relay and automation system;
 - Security camera;
 - System for protecting natural disaster; and
 - Communications system.

2.6. Establishment of the Right of Way

The Mongolian Law on Energy of 2001 (the Law of Energy) and Mongolian Government Resolution No. 97 of 18 March 2020, stipulates the establishment of protection zones or Right of Way (RoW) for transmission lines.

The Resolution sets out specific RoWs as provided in Table 2-1. No trees and any agricultural plantation are allowed within 25 m surrounding substations or any power distribution infrastructure. Owners of trees or shrubs planted or growing within the RoW shall be obliged to move or cut them, if the former may possibly cause damage to the network or obstruct inspection or maintenance of the powerlines.

Table 2-1. RoW for transmission lines in Mongolia

Powerline, kV	Unpopulated areas	Populated areas	Substation and distribution infrastructure	Forested areas and Parks
	Both sides of the outer line, m		Every direction, m	Both sides of the outer line, m
Up to 1 kV		1-1.5 m		
1 – 20 kV	10 m	2 m	10 m	2 m
35 kV	15 m	4 m	15 m	3 m
110 kV	20 m	5 m	20 m	3 m
220 kV	25 m	6 m	25 m	4 m
330 -500 kV	30 m	10 m	30 m	5 m

For this Project with a 220 KV OHTL, the RoW is 25 m on both sides of the line in unpopulated areas and in every direction at substations; and 6 m in populated areas on both sides of the line.

2.7. Land Acquisition

As identified above, under law a RoW or protection zone can be set up by the NPTG. However, to secure this land, the NPTG must obtain relevant letters from each *soum* and *aimag* to declare that the land has been

⁴ Ministry of Energy, 2013. *Choir-Sainshand-Zamyn-Uud 220 kV Overhead Transmission Line Feasibility Study*.

provided for the Project. All the *aimag* governments have allocated land for the Project and land permits to this effect have been issued.

As of 2021, there are seven mining concession licences (for exploration and mining) along the general route of the OHTL. The route has been adjusted since 2020 to avoid passing across two of these sites (Eiku Sora, Modot uul). The route still passes across five sites; of these, agreements have been reached with four licence holders informing they have no objection to the OHTL passing through their license area (Kherlen golyn uils LLC, Batbadmaarag LLC, Mak tsement LLC, Olon ikht bayan LLC). With regard to the remaining licence area (held by Durvun talst erdene LLC), the licence expired on 31 July 2020 and the Ministry sent an official request to the Dornogovi Governor on 4 February 2021 requesting that the transmission line area be excluded from the exploration licence area on renewal. The Dornogovi Governor responded in a letter dated 19 February 2021 (Ref no. 1/208) that no mineral license will be granted along the OHTL route.

Within the OHTL route and RoW, there are no special needs areas or crops. There are no residential structures or other within the OHTL and RoW, though there are water wells and herder households (and associated *gers*) within a 3 km buffer zone either side of the OHTL centreline (6 km buffer zone in total). These are discussed in more detail throughout this Report.

Within the substation site and 25 m around both the existing and proposed new substation site, there are no buildings or structures.

2.8. Design Optimisation

The final position of the individual tower structures will be determined by the Construction Contractor, based on factors such as ground conditions, elevation, and distance between pylons. The Construction Contractor will need to undertake a detailed topographic and geotechnical survey of the ROW and substation sites to inform this micro-siting exercise.

Tower spotting will need to take place; this refers to the determination of individual sites for the installation of the pylons and will rely on the results of land acquisition surveys as set out in the LARF. Minor adjustments may be needed to account for local conditions including siting to avoid impacts on any assets; or where this is not possible, sited to minimise impacts.

2.9. Ancillary Facilities

The power supply for the operation of the Project is an associated facility, however various power supplies within the CES are already operational.

During construction, access to all tower locations will be necessary to perform the civil works, structure erection and stringing of conductors and shield wires. These routes will be determined by the Construction Contractor; however, they will be obliged to use existing roads as much as possible to minimise the impact of the works. Where possible, the OHTL corridor will be used for haulage. Existing secondary roads will be used to access the corridor however, it is likely that new roads will need to be built to support the traffic of Heavy Goods Vehicles (HGVs) to carry materials (structures, cable drums and others), equipment and personnel to site. These roads will be temporary and designed for light traffic.

The roads can be constructed as temporary (for construction phase only) or permanent roads (construction and operation phases). They would be such to permit double transmission loaded vehicles. Any temporary roads would be restored to the original condition after the end of the works; permanent roads would remain open until decommissioning.

In every case the construction of new access roads shall be avoided as much as possible. The use of existing roads is mandatory wherever possible. The Contractor shall adapt the existing ones to the project needs and restore them to the initial condition or an improved one at the end of the works, improving in this way the life of the residents of the area.

The requirement for and location of any borrow pits or quarries is not currently known and would be determined by the Construction Contractor.

During construction, the Construction Contractor will need to install site facilities to support the construction activities: Site Offices, storage areas, worker accommodation, parking areas, etc. Whilst this will be determined by the Construction Contractor and therefore details are not currently available, it is likely that this will comprise a main camp in an intermediate point of the line route. Secondary camp(s) may be installed within the two subsections. These secondary camps will be smaller and will be installed just during the period in which the close jobs are done. As an indicative number, one secondary camp per 100 km of route is a standard procedure, therefore a maximum of two or three camps are expected.

2.10. Project Phases

The Project phases are summarised in Table 2-2.

Table 2-2. Project phases and activities

Project phase	Project activities
Pre-construction	<ul style="list-style-type: none"> Line route and substation survey (detailed topographic and geotechnical survey) and design optimisation Preparation and submission of national EIA Establishment of a RoW and implementation of a Livelihoods Restoration Plan Clearing of access tracks - where possible, access to the site will be along the new RoW; however, it is likely that several temporary access tracks will be required along the route. Typical machinery required is a bulldozer. Vegetation clearance of the substation site
Construction and commissioning	<ul style="list-style-type: none"> Establishment of site storage areas/compounds Transportation of equipment and workers to site Temporary power generation, if required Civil works and installation of substation Levelling and excavation of pole and tower foundations. Erection of towers/poles. Vegetation clearance of the RoW. Stringing of lines. Waste management. Testing and first operation of equipment.
Operation	<p>Operation and maintenance of equipment based on accepted international standards and in accordance with national legislation and practices as set out by the Mongolian Ministry of Energy. The main activities to be carried out during the operation of the Project include:</p> <ul style="list-style-type: none"> Operation of the substations, surveillance of the condition of the overhead lines, towers and RoW; routine, planned and emergency maintenance and repairs; and vegetation control. Routine maintenance – to ensure the integrity and safety of the transmission line. This will include: Foot patrol; Security patrol; and Pole/tower auditing and repairs. Planned maintenance - scheduled maintenance programmes that should be carried out on the overhead lines in accordance with manufacturer equipment specifications or due to the need to repair equipment. Emergency maintenance. Vegetation control and biodiversity (bird fatality) monitoring. Waste management.
Decommissioning	<ul style="list-style-type: none"> Removal of equipment and structures

3. Stakeholder Engagement and Information Disclosure Requirements

3.1. Introduction

Stakeholder engagement and information disclosure will comply with the requirements of the legislation of Mongolia and Good International Practice (GIP), as set out in the requirements of EBRD's ESP 2014. These are described in turn below.

3.2. National Requirements

The key provisions for stakeholder engagement in Mongolia are contained within the following laws:

3.2.1. Law of Mongolia on Environmental Impact Assessment (EIA) (1998, as amended 2001, 2006 and 2012)

This Law stipulates that public involvement in the national Detailed Environmental Impact Assessment (DEIA) process is required. Article 18.4 requires that the opinion of the local population is addressed in undertaking and preparing the DEIA.

According to the Law, Chapter 4 Article 17 paragraph 1-5:

- The state central administrative organization in charge of nature and environment shall make public via its website information the development programs and plans that are subject to a strategic assessment and the projects that have undergone an environmental impact assessment.
- Public comments may be invited during the process of strategic assessments of national and regional policies that the government plans to adopt and of development programs and plans to be implemented.
- The members of the public may comment in writing and verbally within 30 working days.
- It is the responsibility of the legal entity performing the DEIA (the DEIA consultant) to formally seek comments from the local authority, the community likely to be affected by the project and local residents living in the area where the proposed project will be implemented.
- Public participation may be regulated by a procedure which will be approved by the Minister of Nature and Environment.

3.2.2. Regional Development Management Law (2003, as amended 2006)

This Law primarily aims to regulate regional development and balance social and economic objectives. Respect for the powers of local self-governing bodies in the regional development process is underwritten in the Law. The Law empowers local self-governing bodies with the responsibility of engaging citizens in the regional development process, by responding to appropriate queries and encouraging and directing engagement by *'citizens, enterprise and organization'*.

3.2.3. Minister of Environment and Green Development, Ordinance A-117 (04 September 2014)

The Ordinance sets out requirements for disclosure of the DEIA results and consultation with the local community. It stipulates that the DEIA company/consultant should obtain feedback from local government, potentially affected persons and local residents. It also requires that the DEIA consultant organises project-specific engagement selecting appropriate measures to ensure participation and disclose project information. The following methods are identified as useful: sample surveys, questionnaires, interviews, community resource mapping, open discussions and focus group discussions.

The DEIA Report must include the following information:

- Meetings and consultations with the project's affected persons and project stakeholders, surveys conducted, when and how information was disclosed; participants attendance;
- Main themes discussed, information on major issues raised during consultation; and

- Reasonable suggestions raised during consultations which should be reflected in project planning, implementation and operation.

Where a project covers the territory of several *baghs* and *soums*, the DEIA consultant will present the DEIA findings at public meetings in the affected *baghs* to solicit further concerns and suggestions. The DEIA consultant will also inform the *hurals* in the affected *soums* and obtain the *hural* members' views about the project.

3.2.4. Minister of Environment and Green Development, Ordinance A-03 (06 January 2014)

This Ordinance applies to Environmental Strategic Impact Assessment, Cumulative Impact Assessment and DEIAs. The following is required: Information disclosure and transparency of, and access to, information, ensuring exchange of information; consultation and negotiation between proponents of development policy, programs and plans and potentially affected people (directly and indirectly affected), local communities and other organisations; use of data and suggestions by project stakeholders in designing mitigation measures; respect for local peoples' traditional culture, traditions, values, traditional way of life and rights. Information on potential negative impacts on the environment and human health should be open and accessible with citizens and the public provided free access to this information.

The public participation required during the DEIA process is as follows:

- The DEIA will ensure public participation at assessment stages;
- People's feedback on predicted impacts will be obtained using a participatory approach;
- Direct and indirect impacts will be assessed using such tools like consultation, discussions, surveys and cover livelihoods and social issues;
- The project proponent will provide affected communities the information on the project and its positive and negative impacts, and mitigation measures;
- The DEIA Consultant and Project Proponent will, within 15 days after completion of the DEIA Report and Environmental Management Plan, disclose these documents to the *bagh/khoroo* Public meetings and seek feedback;
- Where a project covers the territory of several *baghs* and *soums*, the DEIA Consultant will communicate the DEIA results at each *bagh* public meeting and *soum's hural* to get their feedback and suggestions;
- Affected communities will provide their feedback on the proposed Project before a final decision is made;
- The Project Proponent, Governors of *soums and baghs*, and *aimag* Environmental agencies are responsible for providing access to the approved DEIA Report;
- The Project Proponent has to report to communities and the public at least once a year on Project implementation;
- Grievances on gaps in the DEIA Report may be logged by people/communities to the Project, local authority and Ministry in charge of environment issues;
- The Ministry in charge of environmental issues shall resolve grievances within the scope of the law. In the event that a person or community laws does not agree with the decision, they may lodge a complaint with the courts.

3.2.5. Resolution of Complaints and Complaints from Citizens to Governmental Organisations and Public Servants (April 1995)

In April 1995, the "Resolution of Complaints and Complaints from Citizens to Governmental Organisations and Public Servants" came into effect which partly addresses grievance mechanisms. The Resolution stipulates that governmental bodies are to respond to inquiries and complaints from citizens and must do so within 30 calendar days.⁵

⁵ Parliament of Mongolia. 1995. Resolution of Complaints from Citizens to Governmental Organisations and Public Servants. Mongolia. Available at: <https://www.legalinfo.mn/law/details/294>.

3.3. EBRD Requirements

Committed to promoting environmentally sound and sustainable development, the EBRD prescribes stakeholder engagement requirements in the following documents that are relevant to this Project:

- Environment and Social Policy (2014);
- Public Information Policy (2014);
- PR10 Information Disclosure and Stakeholder Engagement (2014); and
- Relevant EU Directives.

These are discussed in turn below.

3.3.1. EBRD Environmental and Social Policy (ESP) (2014)

The ESP identifies that the EBRD is committed to the principles of transparency, accountability and stakeholder engagement. The EBRD requires clients to identify stakeholders potentially affected by and/or interested in the project, disclose sufficient information about the impacts and issues arising from a project and consult with stakeholders in a meaningful and culturally appropriate manner. Stakeholder should be engaged in proportion to the potential impacts associated with a project.

3.3.2. EBRD Public Information Policy (2014)

EBRD's Public Information Policy (2014) elaborates how the EBRD discloses information and consults with its stakeholders in order to promote better awareness and understanding of its strategies, policies and operations. The following are the requirements of the EBRD Public Information Policy:

- identify people or communities that are or could be affected by the project (including vulnerable groups), as well as other interested parties;
- ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them, through a process of information disclosure and meaningful consultation; and
- maintain a constructive relationship with stakeholders on an on-going basis through meaningful engagement during project implementation.

3.3.3. EBRD Performance Requirement 10 (2014)

EBRD PR10 on information disclosure and stakeholder engagement promotes stakeholder engagement as a focal point to achieve and build a constructive and responsible relationship essential for the successful management of environmental and social issues. The following are the requirements of PR10 on information disclosure and stakeholder engagement:

Stakeholder engagement requirements

- Stakeholder engagement should involve the following elements: stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders;
- The client⁶ should conduct stakeholder engagement on the basis of providing stakeholders with access to timely, relevant, understandable and accessible information, in a meaningful, effective, inclusive and culturally appropriate manner and free from manipulation, interference, coercion, intimidation and retaliation;
- The stakeholder engagement process should begin as early as possible in project development and will continue throughout the project life cycle. The nature and frequency of stakeholder engagement at all phases of the project development will be proportionate to the nature and scale of the project, its potential adverse environmental or social risks and impacts and the level of stakeholder interest. The client will comply with the applicable requirements of national law with respect to public information and consultation, including those laws implementing host country obligations under public international law; and
- The client should define clear roles, responsibilities, and authority as well as designate specific personnel for the implementation and monitoring of stakeholder engagement activities.

⁶ In this case, the Government of Mongolia as represented by Ministry of Energy and the NPTG.

Information disclosure requirements

- Where the project has environmental and social impacts, the client will disclose relevant project information, as appropriate, to inform stakeholders about the risks, impacts and opportunities of the project. The client will provide stakeholders with access to the following information:
 - the purpose, nature, scale and duration of the project;
 - risks to, and potential impacts on, stakeholders and proposed mitigation plans highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and differentiate measures to mitigate these;
 - the envisaged stakeholder engagement process, if any, and opportunities and ways in which stakeholders can participate; and
 - the time and venue of any envisaged public consultation meetings, and the process by which meetings are notified, summarised, and reported; and the process by which any grievances will be managed.
- This information will be disclosed in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (including disability, literacy, gender, mobility, differences in language or accessibility). Where necessary and culturally appropriate, a third party may be hired to disclose the information to avoid intimidation, coercion or any form of manipulation.

3.3.4. EBRD Independent Project Accountability Mechanism

All projects financed by EBRD shall be structured to meet the requirements of the EBRD ESP which includes ten PRs for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

3.3.5. Relevant European Union (EU) Directives

3.3.5.1. EU Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment, as amended by 2014/52/EU (the EIA Directive)

The EIA Directive and its amendments emphasises the need for effective public participation in decision-making, as well as the participation of associations, organisations especially non-governmental organisations. It also requires that, with a view to strengthening public access to information and transparency, timely environmental information should also be accessible in electronic format. Disclosure of impact assessment documents for public comments is also a requirement under the Directive.

Reasonable timeframes should be provided for the public to prepare and participate in the consultation process. The results of consultation should be recorded and taken into account during the project development.

3.3.5.2. Aarhus Convention

The Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (the Aarhus Convention) was adopted by the United Nations Economic Commission for Europe (UNECE) in 1988. On 5 July 2011, the Meeting of the Parties to the Convention adopted a decision encouraging the accession by states outside the UNECE region and a simplified procedure for doing so.

Article 6 of the Convention relates to the provision for reasonable timeframes for participation, opportunities for early participation and the obligation to ensure that "due account" is taken of the outcome of the participation. Article 7 requires Parties to make "*appropriate practical and/or the provisions for the public to participate during the preparation of plans and programs relating to the environment*".

The Mongolian Government is not currently a signatory to this Convention, however the Government has stated an interest in acceding to the Convention through communication with the UNECE. In principle, Mongolian law broadly aligns with the requirements of the Convention.

3.4. Gaps between National and EBRD Requirements

The national framework in Mongolia is broadly compatible with the EBRD requirements of public consultation and stakeholder engagement, but there are several gaps that need to be addressed. The national requirements do not prescribe a detailed identification of stakeholders nor meaningful, two-way consultation. There is also no explicit requirement for a grievance mechanism, although 1995 Resolution of Complaints and Complaints from Citizens to Governmental Organisations and Public Servants does require governmental bodies to respond to inquiries and complaints from citizens within 30 calendar days.

As a Category A project, the Project must engage with stakeholders at every phase of the Project and their feedback should be built into the relevant project documents.

The ESIA documents, including this SEP, are intended to be publicly disclosed for comments on the EBRD website and locally. This SEP may also be developed further for the construction and operations phases of the Project.

4. Stakeholder Identification and Engagement Methods

4.1. Introduction

In order to develop effective stakeholder engagement, it is necessary to identify who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. Defining and categorising stakeholders by their influence or stake in the Project, or if they are impacted by the Project, makes it possible to tailor consultative approaches, themes and tools appropriately. Aligned with EBRD PR10, this Chapter identifies and elaborates the Project stakeholders who:

- (i) are affected or likely to be affected (directly or indirectly) by the Project (affected parties); or
- (ii) may have an interest in the Project (other interested parties).

Having identified who the stakeholders are, this Chapter then sets out the approach to identifying appropriate stakeholder engagement methods.

4.2. Approach to Stakeholder Identification

Stakeholder engagement is an on-going, responsive and evolving process. As the Project develops, new issues may arise which change the priority of stakeholder groups or require the addition of new stakeholders. Therefore, stakeholder identification needs to be regularly reviewed and updated to account for such developments.

During the ESIA process, the Project stakeholders have been identified in an exercise using the criteria of (i) and (ii) above, on the basis of location (i.e. what administrative units are associated with the Project – see Table 4-1) and those groups or individuals identified on the basis of potentially being impacted by the Project. The following has been taken into consideration:

- The Project's activities and area of influence (AoI);
- Potential, or review of current, positive and negative Project impacts;
- Contact with Project relevant government bodies and civil society and business groups; and
- Contact made with organisations expressing, or likely to have, an interest in the Project.

As shown in Table 4-1, the Project intersects with two *aimags* and seven *soums* and associated *baghs* that may experience direct and/or indirect environmental or social impacts from construction and operation of the Project, and therefore all relevant administrative departments and stakeholder groups within these areas have been identified. Furthermore, the identification of directly affected stakeholders has taken into account the 25 m RoW of the OHTL and a 6 km buffer zone (i.e. 3 km either side of the centreline) as an Area of Influence (AoI).

The identification of stakeholders has also included the identification of individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status, and/or because these individuals or any other stakeholder groups are likely to be excluded from, or unable to participate in, the mainstream consultation process or would require specific measures and/or assistance to do so.

Table 4-1. Project elements and relevant administrative areas

Project Element	Soum / Bagh
Substation and Transmission line	Govi-Sumber aimag, Sumber soum, Bagh VI
Transmission line	Govi-Sumber aimag, Shiveegovi soum, Bagh II
Transmission line	Dornogovi aimag, Dalanjargalan soum, Bagh V
Transmission line	Dornogovi aimag, Airag soum, Baghs I and III
Transmission line	Dornogovi aimag, Saikhandulaan soum, Bagh III
Transmission line	Dornogovi aimag, Altanshiree soum, Bagh III
Substation and Transmission line	Dornogovi aimag, Sainshand soum, Bagh IV

A stakeholder list has been prepared (see below) on the basis of the above criteria. It is expected that other stakeholders may be identified during future Project phases and as such, this list will be updated as required and will be reviewed regularly and updated throughout the Project cycle. The risk associated with each stakeholder group can also be subject to change and therefore will also be reassessed periodically.

At a minimum, the stakeholder list will be revised prior to the start of the construction and operation phases.

4.3. Stakeholder Identification and Analysis

Table 4-2 presents the main categories of stakeholders identified and outlines their potential interest in, influence on or impact by the Project. These categories are not exclusive. One individual or group can belong to several categories.

Table 4-2. List of stakeholders

Stakeholder group	Interest / Influence / Impact
Local communities	
Herder households with permanent structures in a 6 km buffer zone of the OHTL (i.e. 3 km either side of the centreline), all of whom inhabit the area from early autumn until spring (winter camp)	Impact May experience potential impacts related to environmental quality (disturbances and dust caused by the Project's traffic and construction works). Influx of construction workers. Risk of herder/livestock and vehicle accidents during construction.
Users of pasture in the 6 km Aol	Impact May experience dust and nuisance impacts from the Project. Influx of construction workers. Risk of pedestrian/livestock and vehicle accidents during construction.
People and businesses in the villages/cities in the Project soums	Impact Potentially affected by disturbances caused by the movement of construction HGVs and personnel, along the main road between Choir and Sainshand and access roads to the Project construction sites. Potential employment opportunities. Potential access to improved electricity supply.
Mining concessions within the Project area of influence	Impact Project will require access to land held by eight mining concessions during construction; and for emergency repairs and general maintenance (e.g. lopping of tree branches near the OHTL).
Road users (individuals, businesses)	Impact Potentially affected (e.g. traffic volumes, delays) by the movement of construction HGVs and personnel along the main roads to site.
Internal Stakeholders	
Project beneficiary – Ministry of Energy / NPTG	Influence Responsible for implementation of the Project, including contractor management. Impact Receive financial recompense from the Project. Contribute to regional economic growth projects through enhanced electricity provision to industry.
Financial Institutions – EBRD	Interest / Influence Interest and influence in minimising risk to their investment by ensuring the Project's ongoing compliance with environmental and social performance requirements through performance-based financial disbursements, regular supervision, and audits.
Employees	Interest

Stakeholder group	Interest / Influence / Impact
	<p>Access to employment opportunities and increased income.</p> <p>Impact</p> <p>Income generation; exposure to potential health and safety risks; assertion of labour rights.</p>
Contractors, Suppliers, and Service Providers	<p>Interest</p> <p>Access to employment opportunities and increased income.</p> <p>Impact</p> <p>Income generation; exposure to potential health and safety risks; assertion of labour rights.</p>
External stakeholders	
National Government Bodies (Ministry of Energy, Energy Regulatory Committee)	<p>Interest</p> <p>Regional energy infrastructure development and economic growth.</p> <p>Influence</p> <p>Control compliance of Mongolian energy policies during construction and operation.</p>
Govi-Sumber and Dornogovi Aimag level Government / Administration <ul style="list-style-type: none"> - <i>Aimag Governor</i> - <i>Aimag Governor's Office</i> - <i>Aimag Departments (Health, Education, Agriculture, Planning, Commerce)</i> - <i>Aimag Hural Speaker and Hural Members</i> 	<p>Interest</p> <p>Regional economic development, taxes and infrastructure development</p> <p>Specific concerns of the electorate.</p> <p>Personal political agendas.</p> <p>Influence</p> <p>Potential to influence Project in terms of granting permits or other approvals; monitoring and enforcing compliance of national laws throughout the Project life cycle.</p>
Soum level Government / Administration (Sumer, Shiveegovi, Airag, Saikhandulaan, Altanshiree, Sainshand, and Dalanjargalan soums) <ul style="list-style-type: none"> - <i>Soum Governors</i> - <i>Soum Governor's Offices</i> - <i>Soum Hural Speaker and Hural Members</i> 	<p>Interest</p> <p>Protect the rights of inhabitants in the Project Area.</p> <p>Influence</p> <p>Potential to influence Project approvals and timeframes.</p>
Bagh level Administration (Sumer soum, Bagh IV; Shiveegovi soum, Bagh II; Dalanjargalan soum, Bagh IV; Airag soum, Baghs I and III; Saikhandulaan soum, Bagh III; Altanshiree soum, Bagh III; Sainshand soum, Bagh IV) <ul style="list-style-type: none"> - <i>Bagh Governors</i> 	<p>Interest</p> <p>Protect the rights of inhabitants in the Project Area.</p> <p>Ensure harmonious relations among the herders.</p> <p>Influence</p> <p>Potential to influence Project approvals and timeframes.</p>
Opinion Influencers <ul style="list-style-type: none"> - <i>Soums' Elderly Association</i> - <i>Soums' Womens' Association</i> - <i>Herder Cooperatives</i> 	<p>Influence</p> <p>Potential to influence Project approvals and timeframes.</p> <p>Potential to influence community support for the Project.</p>
Regional Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs)	<p>Interest</p> <p>Promote green policies in pursuit of sustainable living.</p> <p>Protect the environment and vulnerable groups from Project adverse impacts.</p> <p>Influence</p> <p>Lobbying and advocacy to curtail or progress Project developments.</p>

Stakeholder group	Interest / Influence / Impact
Local businesses and business organisations Aimag branch of Chamber of Commerce and Industry	Interest Procurement and supply chain oversight. Impact Opportunities for increased revenue from construction and operations workforce. Provision of improved electricity supply.
Local services (Health care, Fire, Police)	Interest Provide support services during the construction phase e.g. Emergency Preparedness and Response Plan. Impact Increase in the number of local service users especially during construction; potential H&S impacts during operation.
Press and Media	Interest Platform for stakeholders to express their interest in the Project and its impacts. Platform for Project personnel to engage with stakeholders on various topics. Influence Potential to influence public opinion.
Social Media e.g.: <ul style="list-style-type: none"> - FB group “Choir Zar – 41K members - FB group “Дорноговь зар мэдээлэл” – 31K members - FB group “Дорноговь зарын групп” – 27K members 	Interest Platform for stakeholders to express their interest in the Project and its impacts. Platform for Project personnel to engage with stakeholders on various topics. Influence Potential to influence public opinion.

4.4. Vulnerable Groups

The EBRD ESP definition of vulnerable was reviewed to identify vulnerable people or groups in the Project Area, whereby ‘vulnerable groups’ refers to

“people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. Vulnerable individuals and/or groups may also include, but not be limited to, people living below the poverty line, the landless, the elderly, women and children-headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and/or international law.”

According to the social workers consulted, employed at the Labour and Social Welfare offices in the Project *soums*, vulnerable groups or individual are those who have a physical or mental disability; children living in harsh conditions; the elderly; individuals requiring care; orphan children; single parents with four or more children; and the homeless, as prescribed by the Mongolian Law on Social Welfare, 2012.

Vulnerable groups in the Project Area are people with disabilities (PWD), single headed households and households with economically inactive persons.

Herders as a group are not considered vulnerable in the context of the Project, however some herder households are considered vulnerable as, among herder-households who use the winter camp in the 6 km buffer zone, there are household members who meet the local eligibility criteria for vulnerability. Among the members of the 22 households in the winter camp interviewed, there is a disabled person and two elderly persons requiring care who qualify as vulnerable according to the above criteria. As there are a greater number of households who reside in the winter camp, there will certainly be more vulnerable members for the Project to consider in its stakeholder engagement strategy. Since the three identified vulnerable persons live with other household members, they will be able to learn about the Project second-hand. If they wanted to participate in

the Project more actively and independently from the other household members, then the Project will need to ensure that it can accommodate their special needs by adopting appropriate communication channels, such as personal invitations to events or briefings, consultations and briefings by text, phone call or camp/ger visits.

4.5. Methods of Communication

While stakeholder consultation generally includes some form of project information disclosure, there is additional emphasis during stakeholder engagement on proactive dissemination and two-way exchange of information. Engagement therefore makes specific provision for stakeholder input and feedback in relation to the Project. Section 4.5.1 sets out general engagement methods that can be employed, however, due to the COVID-19 pandemic, current constraints in implementing engagement and disclosure are identified (Section 4.5.2), and therefore Project-adapted methods are set out in Section 4.5.3. How these were implemented during the ESIA and how they are proposed to be implemented during the next stages of the Project are addressed in Chapters 5 and 6; any future approaches proposed will need to be under constant review.

4.5.1. Engagement Methods

The following are potential methods of engagement that can be employed for effective Project stakeholder engagement and information disclosure (organised alphabetically):

Table 4-3. Stakeholder consultation methods

Consultation method	Advantages	Disadvantages
Focus-group discussions (FGDs)	Good for targeting specific groups (such as vulnerable groups, herders, women), issues or concerns, and allowing for the application of adaptive engagement techniques tailored to the focal group, issue or concern.	Can involve much preparation of adaptive techniques associated with this engagement method, and the more intensive nature of small group information sharing can result in stakeholder fatigue.
Formal meetings/ Key Informant Interviews (KIIs)	Provide opportunity to obtain detailed understanding / information from people with firsthand / specialised knowledge of particular issues, or interest in an issue.	The formal and more structured nature of meetings can suppress flexibility over the issues addressed and inhibit opinion sharing, especially meetings involving very different levels of seniority.
Information Boards	Can be used to provide the public access to leaflets and information materials. Good for presenting project information to a wide audience and creating awareness. Provides consistent information.	Does not provide opportunity for face-to-face feedback. May be misinterpreted if provided without discussion.
Information Materials / Leaflets	Can be used to provide the public access to leaflets and information materials. Good for presenting project information to a wide audience and creating awareness. Provides consistent information.	Does not provide opportunity for face-to-face feedback. May be misinterpreted if provided without discussion.
Local Media, Radio, and Newspaper Articles	The Project may use media such as TV, radio, newspaper, and social media to disseminate information and create awareness. Provides information to a wide audience. Provides consistent information.	May not be heard or seen by all stakeholders. Does not provide opportunity for face-to-face feedback. May be misinterpreted.
Web meetings	Provide alternative approach to formal meetings in person, allow a meeting to take place if face-to-face meetings are not possible.	Difficult for larger groups. Not everyone will have access to web platforms for meetings.
Phone calls	Allows engagement to take place if face-to-face meetings are not possible, especially consultation with the elderly or disabled.	Harder to maintain records of engagement. Only practical for a targeted number of people rather than entire communities.
Engagement through local actors e.g. <i>Soum</i> and <i>bagh</i> meetings	Enables data to be disseminated through existing channels to a large number of people.	Reliant on a third party. Feedback may not be reported back to the Project in full.
Public meetings	Able to convey less technical project information to, and elicit views from, large	Do not allow for detailed discussion or analysis and can often become unruly and hard to facilitate. In addition, they do not

Consultation method	Advantages	Disadvantages
	stakeholder audiences, particularly impacted communities.	encourage the sharing of views and opinions from less vocal marginalised stakeholders.
Social Media-based Engagement	The social media platforms are considered one of the key media channels in Mongolia as internet connections are widely available and social media is popular. Of the 2.2 million internet users in January 2020, 68% use social media. ⁷ <i>Baghs</i> and <i>soums</i> have their own Facebook pages.	Vulnerable individuals in herder household may not have access.
Surveys and questionnaires	Enables feedback on the project; can be used to collect socio-economic data. Can be disseminated via survey papers or telephone.	May not be easy to disseminate surveys or questionnaires to all stakeholders; or for them to feedback.
Website	Provides information to a wide audience. Provides consistent information.	Depends on who is hosting the website and whether data is updated regularly. May not be heard or seen by all stakeholders. Does not provide opportunity for face-to-face feedback. May be misinterpreted.

4.5.2. COVID-19 Limitations

Due to the COVID-19 pandemic, the Government of Mongolia declared a heightened state of readiness on 12 February 2020 without a clear end date.⁸ The following national restrictions were in place during the development of the Project ESIA.⁹

- All types of public gatherings except for public civil works were prohibited; and
- Management of legal entities operating in the capital city were required to check the body temperature of clients and employees at the office; clients and employees were required to sanitise their hands upon entering premises, to wear face masks, and to sanitise their work spaces.

On 11 November 2020, Mongolia recorded its first domestic coronavirus transmission¹⁰ following hundreds of imported cases. The country has not seen any fatalities linked with the pandemic. Before November 11, all of Mongolia's cases were imported from abroad via repatriated citizens. On November 12, the Mongolian State Emergency Committee announced a full curfew for five days until November 17 in Ulaanbaatar.

As of 07 June 2021, the total number of cases is 66,433, with 313 deaths which have occurred since January 2021. Out of a total of 85 community spread cases. 18 are in Ulaanbaatar, 41 in Selenge *aimag*, 13 in Orkhon *aimag*, 11 in Darkhan-Uul *aimag*, and one in Airag *soum*. There are 74 active cases in **Dornogovi aimag**, and 89 active cases in **Govi-Sumber aimag**.^{11,12}

In response to the pandemic, EBRD also issued a Note: “*Stakeholder Engagement (PR10): COVID-19 Briefing Note*”. The Note identifies that each EBRD project and country of operations requires a tailored approach to information disclosure and stakeholder engagement during the COVID-19 pandemic. Factors to consider in developing an engagement plan are identified as:

- *Connectivity*: limited mobile-phone usage and internet connectivity can make electronic communication more challenging in some contexts.
- *Literacy*: variable levels of literacy amongst project stakeholders may reinforce the need for more oral and visual rather than written engagement channels.

⁷ Datareportal. 2020. Digital 2020: Mongolia. <https://datareportal.com/reports/digital-2020-mongolia>.

⁸ PWC. 7 April 2020. COVID-19 Mongolia Legal Guidebook. Key issues to consider. Available at: https://www.pwc.com/mn/en/publication/assets/legal_guidebook_Covid-19.pdf. Accessed June 2020.

⁹ Governor of the Capital City. 22 February 2020. Decree of the Governor of the Capital City. Mongolia.

¹⁰ Patient zero was a 29 year-old cross-border truck driver (named Citizen D) who had been released from isolation on November 6. Citizen D had been isolated at the Enkhsaran Health Resort for 21 days upon arriving from Russia.

¹¹ <https://covid19.mohs.mn/p/cat/post/57/>

¹² <https://visual.ikon.mn/covid-19>

- *Cultural considerations*: direct methods of engagement such as telephone surveys may not be appropriate in some cultural contexts.
- *Language*: online engagement tools may be lacking local language versions.
- *Vulnerable people*: vulnerable project stakeholders may be harder to reach using non-traditional engagement methods. Care is therefore required in ensuring that an engagement strategy deploys approaches that specifically target these groups.
- *Stakeholder database*: review existing stakeholder lists to ensure that key stakeholders and their contact information are included; and consider if there are any new Covid-19 related stakeholders who need to be added to the database. Any effort to develop a stakeholder database must respect people's privacy and be consistent with regulations such as the General Data Protection Regulation.¹³
- *Anonymity and risks of reprisal*: The transparency of online engagement platforms can increase the risk of reprisals. It is therefore important to ensure that channels continue to be available for stakeholders to raise concerns, questions or complaints and have these addressed securely and/or anonymously.
- *Government restrictions on social distancing and gatherings*: tailored approaches need to be flexible so that they can comply with local restrictions.

4.5.3. Project Methods

The methods of engagement employed during the ESIA process to date have, therefore, been affected by the COVID-19 restrictions. Specifically, public consultations and large group meetings could not take place. A contactless approach where possible has been followed (for example, phone calls), as well as small targeted meetings and engagement in the field (i.e. outside an office or enclosed environment). The planned disclosure and potential methods, covering COVID-19 options, used during the ESIA and proposed for the future are set out in Table 4-4 and will require review as the Project moves forward on an ongoing and regular basis. Essentially, the most appropriate method should be chosen to obtain the relevant information taking into account COVID-19 restrictions the wishes of the stakeholder.

This SEP currently assumes that for the immediate duration of this Project, certain restrictions will remain in place and therefore no public meetings are proposed and, wherever possible, contactless methods or one-on-one methods of engagement will be used.

Table 4-4. Key engagement methods used and proposed

Stakeholder category	Planned engagement	Methods available, to be adapted as appropriate
Local communities		
Herders	Census and asset valuations (in the case of economic or physical displacement)	One-to-one meetings/surveys, Telephone questionnaires and feedback forms
	Provide Project information updates; seek feedback	Public consultation, One-to-one meetings, Phone calls, SMS texting, Information Boards, Project Leaflets (e.g. newsletter, brochures), Local Media, Social Media, Survey forms
	Ongoing opinion surveys	One-to-one meetings, Phone calls, SMS texting, Focus groups, Telephone questionnaires and feedback forms
Soum and Bagh population	Provide Project information updates; seek feedback	Posting of events and information on the soums' and baghs' Facebook pages, Information Boards, Project Leaflet (e.g. newsletter, brochures), Focus groups, public consultation.
	Ongoing opinion surveys	One-to-one meetings, SMS texting, Focus groups, Ongoing opinion surveys via telephone/postal/online questionnaires

¹³ The General Data Protection Regulation (EU) 2016/679 (GDPR) is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA). It also addresses the transfer of personal data outside the EU and EEA areas.

Stakeholder category	Planned engagement	Methods available, to be adapted as appropriate
Communities and businesses in the Project Area	Provide Project information updates; seek feedback; consult on any opportunities to collaborate or support	Surveys, key informant interviews, focus groups, public consultation. One-to-one meetings, SMS texting, Web calls (e.g. Skype), Information Boards, Project Leaflet (e.g. newsletter, brochures), Local Media, Social Media.
Mining concessions within the Project area of influence	Provide Project information updates; discuss mining concessions	One-to-one meetings, Official letters, Web calls.
Road users (individuals, businesses)	Provide Project information updates; seek feedback	Public consultation, Local Media, Information Boards, Social Media.
Internal Stakeholders		
Project beneficiary – Ministry of Energy / NPTG	Discuss Project information updates	One-to-one meetings, Phone calls, Web calls.
Financial Institutions – EBRD	Provide Project information updates	Web calls, Information Materials.
Employees	Provide Project information updates; Employment aspects; Grievances	One-to-one meetings, Company notices, Local Media, Social Media.
Contractors, Suppliers, and Service Providers	Provide Project information updates; Tender details; consult on any opportunities to collaborate or support	Company notices, Official letters, Local Media, Social Media, Information Boards, Project Leaflet
External stakeholders		
National Government Bodies (Ministry of Energy, Energy Regulatory Committee)	Provide Project information updates; seek feedback	One-to-one meetings, Web calls, small group meetings.
Govi-Sumber and Dornogovi Aimag level Government / Administration - Aimag Governor - Aimag Governor's Office	Provide Project information updates; seek feedback	One-to-one or small group meetings, Disclosure materials, focus groups.
- Aimag Departments (Health, Education, Agriculture, Planning, Commerce)	Provide Project information updates; seek feedback; consult on any opportunities to collaborate or support	One-to-one meetings, focus groups and workshops, Disclosure materials, SMS texting, Web calls.
- Aimag Hural Speaker and Hural Members	Provide Project information updates; seek feedback	Formal meetings, Hural meetings, Disclosure materials, SMS texting.
Soum level Government / Administration - Soum Governor - Soum Governor's Office	Provide Project information updates; seek feedback	Formal meetings, focus groups and workshops, Disclosure materials, Phone calls.
Soum Hural Speaker and Hural Members	Provide Project information updates; seek feedback	Formal meetings, Hural meetings, Disclosure materials, SMS texting.

Stakeholder category	Planned engagement	Methods available, to be adapted as appropriate
Bagh level Administration - Bagh Governors	Provide Project information updates; seek feedback	Formal meetings, <i>Hural</i> meetings, Small group meetings, Disclosure materials, SMS texting.
Opinion Influencers	Provide Project information updates; seek feedback	<i>Soum</i> and <i>bagh</i> meetings, individual meetings, surveys, focus groups and workshops, local disclosure materials (e.g. newsletter, brochures etc.).SMS texting, Web calls, Information Boards, Project Leaflet (e.g. newsletter, brochures), Local Media, Social Media.
Regional Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs)	Provide Project information updates; seek feedback	Formal meetings, public consultation, Disclosure materials, SMS texting, Web calls, Information Boards, Project Leaflet (e.g. newsletter, brochures), Local Media, Social Media
Local businesses and business organisations	Provide Project information updates; seek feedback; consult on any opportunities to collaborate or support	Surveys, focus groups and workshops, Formal meetings, Disclosure materials, small meetings, SMS texting, Web calls, Information Boards, Project Leaflet (e.g. newsletter, brochures), Local Media, Social Media.
Local services (Health care, Fire, Police)	Provide Project information updates; seek feedback; consult on any opportunities to collaborate or support	Formal meetings, One-to-one meetings, Official letters, SMS texting, Web calls.
Press and media, including social media	Provide Project information updates	Interviews, press releases/newspaper articles, website, fact sheets, Disclosure materials, Phone/ Web calls.

5. Stakeholder Engagement

5.1. Introduction

The term 'stakeholder engagement' refers to an on-going process, encompassing stakeholder identification, disclosure, consultation, participation, and reporting, through which an agent of change aims to build and maintain constructive relationships with its stakeholders. It is a broad, inclusive and continuous process between a Project proponent and those potentially impacted that encompasses a range of activities and approaches and spans the entire life of project.

The objectives of external communications are to provide continuous engagement with targeted audiences to inform them about Project activities and performance and to obtain feedback from stakeholders about the Project. This section describes the stakeholder engagement goals and the engagement undertaken by the Client and the ESIA Team to date. Future engagement is addressed in Chapter 6.

5.2. Ongoing Engagement Goals

The overarching goals of ongoing stakeholder engagement are to:

- Comply with national regulations and EBRD PRs;
- Build and maintain mutually beneficial and lasting relationships between the Project developer (the Client), Contractors and stakeholders; and
- Ensure that stakeholders are fully aware of the Project, impacts and benefits, providing informed access to redress where necessary and the opportunity to discuss and negotiate sustainable development solutions.

The Stakeholder Engagement Programme aims to:

- Ensure regular, timely, accessible and appropriate dissemination of information in culturally appropriate formats, to facilitate an accurate and realistic understanding of potential impacts and benefits generated by the Project;
- Provide stakeholders and especially communities with the means to address concerns and grievances, in a structured, reliable and responsive manner;
- Include vulnerable people and their representatives in stakeholder engagement initiatives;
- Report regularly and in a structured manner to all stakeholders, with special attention to appropriate forms of reporting among the participating communities; and
- Establish and maintain the management capacity, responsibilities and systems to ensure the effective implementation of the detailed SEP.

5.3. Stakeholder Engagement Phases

The following stakeholder engagement phases are relevant to the Project:

- NTPG Project Engagement to date;
- ESIA Scoping Engagement (19 to 23 April 2020);
- ESIA Baseline/Impact Engagement (08 to 12 June 2020);
- ESIA Disclosure and Consultation Phase; and
- Ongoing engagement after the ESIA disclosure process is complete and throughout the Project life cycle, comprising:
 - Pre-construction phase;
 - Construction phase;
 - Operation and Maintenance (O&M) phase.

The ESIA Scoping Phase and Baseline/Impact Engagement Phase are discussed in turn below. ESIA Disclosure and Consultation Phase and on-going engagement will be undertaken as the Project progresses and are described in Chapter 6.

5.4. NPTG Stakeholder Engagement

During the 12 April 2020 meeting between the ESIA team and the Working Group, comprising NPTG management representatives, it was established that previous stakeholder engagement had been limited to meetings between NPTG, a contracted mapping company, and local authorities for the purposes of creating and modifying the OHTL route in 2013 and 2019. A Feasibility Study (2013) had been produced, which may have been informed by other technical specialists and governmental departments.

In early 2020, NPTG approached the *Hurals* (citizens representatives) in each of the seven *soums* with requests for land located in their jurisdictions to be allocated to the Project. By June 2020, six of the seven *Hural* authorities had agreed to allocate land for the Project. *Sumber soum* of Govisumber *aimag* has preliminarily agreed to allocate land and is waiting for approval from the *Hural* authorities, who has not convened due to the recent parliamentary election. Due to the limited stakeholder engagement which concerned technical issues only, no specific environmental or social issues had been raised by these stakeholders.

No further engagement to date has been undertaken by NPTG.

5.5. ESIA Engagement

5.5.1. Overview

A summary of the stakeholder groups and when they were engaged as part of the ESIA process is provided in Table 5-1. The Scoping Engagement and Baseline/Impact Engagement is then discussed in more detail in Sections 5.5.2 and 5.5.3 respectively.

Table 5-1. ESIA stakeholder engagement summary

Stakeholder group	Scoping engagement (undertaken)	Baseline engagement (undertaken)
Local communities		
22 Herder households with permanent structures in the 6 km buffer zone of the OHTL		+
Users of pastures in the 6 km buffer zone		
People and businesses in the Project Area (i.e. in the <i>aimag</i> and the Project-affected soums, including those in the vicinity of the proposed substations)		+
Mining concessions within the Project area of influence (two mining concessions in Dalanjargalan soum)		
Road users (individuals, businesses)		
Internal Stakeholders		
Project beneficiary – Ministry of Energy / NPTG	+	+
Financial Institutions – EBRD	+	+
Employees		
Contractors, Suppliers, and Service Providers		
External stakeholders		
National Government Bodies (Ministry of Energy, Energy Regulatory Committee)	+	
<i>Aimag</i> level Government / Administration	+	+
<i>Soum</i> level Government / Administration	+	+
<i>Bagh</i> level Government / Administration	+	+
Regional Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs)		
Local businesses and business organisations		+
Local services (Health care, Fire, Police)		
Press and media, including social media		
Opinion influencers		

5.5.2. ESIA Scoping Phase

Key Informant Interviews (KIIs) took place with local government officials between 19 to 23 April 2020 for the purposes of collecting baseline information and listening to concerns and issues about the Project. This fieldwork visit took place during the COVID-19 restrictions and the lambing period, both of which had the effect of limiting the number of key officials available for the interviews. The closure of the road from Sainshand to Ulaanbaatar, for instance, resulted in the cancellation of meetings in *Airag soum* of Dornogovi *aimag*. In addition, two *bagh* officials in Sainshand *soum* declined to meet with the Team claiming they had not received official permission from their higher governing bodies.

A further limitation was that since the Land Use Officials had not seen advance copies of the proposed new OHTL route, they could only provide general information about land use in the vicinity of the AoI.

Consequently, information obtained from the fieldwork scoping visit was limited to secondary data to be used for the baseline and general information about the Project's Area of Influence.

Table 5-2 provides a summary of key stakeholder engagement undertaken between 19 to 23 April 2020.

Table 5-2. Stakeholders engaged with during ESIA scoping phase

Location	Officials met
Govi-Sumber aimag	Meetings with Govi-Sumber aimag officials (April 20):
	Land officer – D. Misheel
	Chief Engineer of the Govi-Sumber Electricity Distribution Network - Boldbaatar
	Meetings with Sumber soum /Choir officials (April 20):
	Land officer – B. Altantuya
	Treasury Fund specialist – D. Munkhtsogt
	Soum Governor and Deputy Governor – Amarsaikhan and Khishgdorj
	Head of the Governor's Office - Khatantumur
	Agricultural specialist – Suvdshur
	Governors of <i>Baghs</i> #3 and #4 – T. Gantulga and Odgerel
	Meetings with Shiveegovi soum officials (April 20):
	Soum Governor and Deputy Governor – S. Yagaantsetseg and Bamunkh
	Chairman of Citizen's Representative <i>Hural</i> – Ts. Erdenebat
	Land officer – E. Bayarmagnai
	Governor of <i>Bagh</i> #1 - Nandintsetseg
Dornogovi aimag	Meetings with Dornogovi aimag officials (April 21):
	Head of <i>Aimag</i> Governor's Office – B. Ganzorig
	Investment, development policy and planning specialist – B. Tsen-Ayush
	<i>Aimag</i> Statistical Department, Senior officer – B. Tserendorj
	Director of Dornogovi Electricity Distribution Network – D. Chintogtokh
	Meetings with Dalanjargalan soum officials (April 20):
	Soum Governor – S. Urantsetseg
	Land officer – Otgonbat
	Head of Governor's Office – B. Oyubyamba
	Head of Treasury Department - Tsogzolmaa
	Governor of <i>Bagh</i> #4 – Bekhbat
	Meetings with Sainshand soum officials (April 21):
	Land officer – Myadagmaa
	Land cadastre and land ownership specialist – A. Ankhildul
	Land management and planning specialist – U. Narangerel
	Meetings with Saikhandulaan soum officials (April 21):

Location	Officials met
	Soum Governor – Erdenejargal
	Land officer – Ganaajav
	Tsokio <i>Bagh</i> leader – no name recorded
	Meetings with Altanshiree soum officials (April 21):
	Soum Governor – L. Tsetsegdari (was called away for urgent meeting)
	Statistics specialist – no name recorded
	Meetings with Airag soum officials: no meetings due to State Emergency Commission road closure

Table 5-3 presents the key issues and feedback identified in relation during the scoping phase. The majority of the information provided was fed into the Social Baseline Chapter of the ESIA Report.

Table 5-3. Summary of stakeholder issues

Topic	Stakeholder issues and concerns
Unregistered herders using pastureland under mining licenses in <i>bagh</i> II, Shiveegovi soum and <i>bagh</i> IV, Sainshand soum.	Unregistered herders need to be identified and consulted with regarding access restrictions and other Project-induced impacts. Tensions or conflicts with mining licensees need to be anticipated and mitigated.
All pastureland users in the Aol	There is competition among herders and non-resident herders for quality pastureland in the Project Area. Overgrazing, lack of water supply points, and shared use with native wild animals, such as white gazelles create tension and conflicts. The <i>bagh</i> leaders stated their intentions to examine how the Project may aggravate social relationships among users and their follow-on impacts on biodiversity. This has nothing to do with the Project. Vehicle dust during construction stage.
Herders' spring and winter shelter users	Need to be identified and covered. A total of 80 were identified by the Project Team and documented on maps. This would presumably be the same group as the mentioned in the next row.
Herder- households living in the winter camp	Construction impacts, such as dust and noise affecting health of people and livestock. Access restrictions during construction. Herding-related transport accidents may increase due to influx of trucks and machinery to and from the Project site. This is only relevant during winter and early spring. They will be moving around after that in other pastures.
Residents	Confirm whether residents have access to 220 kV electricity from the transmission line. It is assumed that direct beneficiaries will be businesses and mines, however residents who have access to the CES distribution will indirectly benefit.
Industrial versus agricultural producers	Livestock pastureland is gradually being squeezed out by the mining industry due to the intensity of regional mining. There is a growing concern that the Project will provide a reliable source of energy for the region to support mining and other heavy industries at the expense of the livestock animal husbandry sector.

5.5.3. ESIA Baseline/Impact Engagement Phase

For the ESIA Baseline/Impact Engagement phase, a *Choir-Sainshand TL Project ESIA – Social Baseline Field Work Plan* was prepared to obtain baseline data and undertake consultations. The focus of the engagement, which was undertaken alongside the social baseline fieldwork, was to gather further data and feedback on the Project-affected communities within the Aol and the potential impact of the Project on their livelihoods.

The specific objectives of engagement during the ESIA baseline phase were to:

- Further identify stakeholders related to the Project;
- Identify and access additional data for the baseline;

- Gather stakeholder opinions on the Project and ensure that these opinions are fed into the assessment process;
- Identify potential impacts and issues;
- Gather stakeholder feedback on the development of management and mitigation measures for potential impacts, particularly where stakeholders have a potential role to play in implementing these measures;
- Collect stakeholder opinion and preferences on future engagement methods; and
- Visit herder households in the 6 km buffer zone and conduct a Household (HH) survey about sources of livelihood, income generation, and other social issues of a select number of households within this buffer zone.

A team of five in-country social and land specialists undertook the formal meetings, KIIs and HH surveys from 8 to 12 June 2020 (Questions are set out in Appendix A). The five *soums* of Sumber, Shiveegovi, Dalanjargalan, Airag and Sainshand were visited. The *soums* of Altanshiree and Saikhandulaan were not covered as it had previously been identified that there were unlikely to be any herder households in the vicinity of the OHTL line due to the small number of herder households that reside or transit through these two *soums* where the quality of pastureland is exceptionally poor; and because the KIIs with the *soum* officials had already been carried out in the Scoping Stage engagement.

A summary of the ESIA Baseline/Impact Assessment Engagement is as follows:

1. **Formal meetings:** Discussions with local authorities were conducted to increase awareness about the Project and to obtain their perspectives on the Project in relation to the areas in their authority. A total of 54 officials were engaged during the baseline fieldwork visit.
2. **KIIs:** A total of 34 KIIs were conducted with the local authorities and specialists on issues within their expertise.
 - *Map development meetings:* The Team consulted with specialists in the Departments of Land Management, Urban Planning, and Cadastre in the *aimags* of Dornogovi and Govi-Sumber to obtain detailed locational data about the households and substations in the Aol, which resulted in the production of three key maps. Contained in these maps are:
 - GPS coordinates of herder-household shelters, cultural heritage sites and protected areas, and areas with mining licences within the 6 km buffer zone of the OHTL in the five *soums* of Dornogovi *aimag* and in the two *soums* of Govi-Sumber *aimag* (two separate maps); and
 - GPS coordinates of the areas planned for the substations in Sainshand and Choir and surrounding environs.
3. **Consultations with households:** The Team visited 57 winter and spring shelters using the GPS coordinates provided by the *aimag* and *soum* land specialists. Of these 57 shelters, the Team interviewed 22 households which were still residing in the area (the other households had already moved to summer pasturelands outside the Aol). During these visits, the Team conducted a household survey covering a diverse range of topics, which included information about land uses and seasonality, income and expenditure, livestock and other assets. The questionnaire also contained questions about household composition, livelihood sources, local informal land tenure practices, social organisation, women's status, youth issues, community health and safety, cultural heritage sites of local value and views on potential impacts of the Project on their household and the wider community.

Table 5-4 provides a summary of the key stakeholder engagement undertaken from 8 to 12 June 2020.

Table 5-4. Key stakeholder engagement during the Baseline Engagement phase

Location	Officials met
Govi-Sumber <i>aimag</i>	Meetings with Govi-Sumber Aimag officials (June 11):
	Senior criminal investigator of the Aimag Police Department – Batkhuyag
	Head of Aimag Health Department – Munkh-Od. D
	Head of Agriculture and SMEs Department – Davaakhuu. N
	Specialist of Department of Environment and Tourism – Munkh-Erdene. D
	Head of Department of Finance and Treasury – Otgontuya. A

Location	Officials met
	Head of Department of Development Policy and Planning – Bat-Erdene. T
	Specialist of Department of Agriculture and SMEs - Erdenebayar
	Specialist of Department of Land, Construction and Urban Development – Ganzorig. D
	GIS specialist of Umard Gobi Guveet Khalkhyun Dundad Talyn River Basin - Batkhuu
	Head of Management Department of Aimag Police Department – Ariunaa. Sh
	Culture specialist of Department of Education, Culture and Science – Garamsan. B
	Meetings with Sumber <i>soum</i> /Choir officials (June 12):
	Deputy Governor of <i>Soum</i> Governor's Office – Khishigdorj
	<i>Bagh</i> #4 Governor – Odgerel. T
	Specialist in charge of agriculture - Erdenebayar
	Department of Education and Culture, Culture specialist – Zurgaanjin. A
	Meetings with Shiveegovi <i>soum</i> officials (June 12):
	Chairman Citizen's Representative <i>Khural</i> – Erdenebat. Ts
	Head of Department of Agriculture and SMEs – Buyannemekh. Sh
	Land Specialist – Bayarmagnai
	Environmental specialist – No name recorded
	Specialist of Department of Social Welfare/Labour – Baasandalai. Z
Dornogovi <i>aimag</i>	Meetings with Dornogovi <i>aimag</i> officials (June 8-9):
	Infrastructure specialist - Munkhbayasgalan
	Head of <i>Aimag</i> Branch of Chamber of Trade and Industry – Otgonbayar. Sh
	Head of Department of Agriculture and SMEs - Naranbold
	Head of <i>Aimag</i> Police Department - Erdenebaatar
	Head of the Department of Agriculture - Tsetseg-Ochir
	Head of <i>Aimag</i> Health Department - Enkhtsetseg
	Specialist of Department of Protected Areas – Enkhzorig. S
	Head of Department of Investment, Development Policy and Planning – Tuvshintur. T
	Head of Department of Finance and Treasury – Sodkhuu. Ts
	Head of Department of Land, Construction and Urban Development - Oyunsai Khan
	Specialist in charge of land management, planning and engineering exploration and monitoring - – Narangerel
	Head of Department of Land Management – Oyungerel
	Department of Land, Construction and Urban Development, Specialist in charge of geodesy and cartography– Enkhbat. Ch
	Cadastre specialist of Department of Land, Construction and Urban Development - Ankhildul
	Head of <i>Soum</i> Governor's Office – Tungalagtuya
	Head of Statistics Department – Ulziisaikhan
	Head of Galba-Oosh Dolood River Basin – Yalaltbayar
	Head of Department of Environment and Tourism – Suren
	Director of Aimag Museum – Erdenebat
	Head of Development Policy Department - Olzbayar. L
	Head of Meteorological and Environmental Research Agency - Enkhmaa
	Meetings with Dalanjargalan <i>soum</i> officials (June 10):
	Head of <i>Soum</i> Governor's Office – Oyunbileg. B

Location	Officials met
	Specialist of Department of Agriculture and SMEs – Narandelger. M
	Specialist of Department of Environment and Tourism – Dandarbaatar. S
	<i>Bagh</i> # 3 (Bichigt bagh) Governor – Purevsuren. A
	Chairman of Citizen's Representative Khural – Mendsaikhan. G
	Social Welfare/Labour specialist – Tsetsegmaa. U
	Land Officer – Otgonbat. M
	Meetings with Sainshand <i>soum</i> officials (June 10):
	Head of Department of Agriculture and SME – Tsetseg-Ochir
	Social policy specialist - Uugantsetseg
	Head of Sainshand Mayor's Office - Otgonbayar
	Citizen's Representative Khural – Erdenebayar. D
	Representative of Citizen's Representative Khural - Batbayar
	Land Officer – Jargalsaikhan
	Head of Department of Development Policy and Planning – Olzbayar. L
	Meetings with Airag <i>soum</i> officials (June 10-11):
	<i>Soum</i> Governor – Munkhjargal. L
	<i>Bagh</i> #1 Governor – Myadagmaa. N
	<i>Bagh</i> # 2 Governor – Batbayar. B
	Specialist of Department of Environment and Tourism – Lkhamsuren. E

Table 5-5 provides a summary of key stakeholder issues and feedback provided.

Table 5-5. Summary of stakeholder issues

Stakeholder group	Key concerns, raised issues and engagement ideas
Local communities	
Herder households with permanent structures in the 3-5 km area of TL line	<ul style="list-style-type: none"> • Herders who participated in the survey had no prior information about the OHTL line Project. • Herders were not in favour of the Project. The building of the OHTL line will not have a direct effect on the lives of herders. It was reported, however, that dust from the construction phase of the Project may adversely affect the health of herders and their livestock. • Pasture lands are shrinking due to the developing mining industry in the region. Providing reliable, high voltage, electrical energy sources to the mines and supporting the mining and manufacturing industry will serve as a base to indirectly affect the traditional livestock industry through the further shrinking of available pastureland. • Only one road must be used during the building phase of the Project in order to prevent land damage caused by multiple roads. • Herders are concerned about activities such as building camps, digging soil and industrial truck operations due to the development of the mining industry in the region. Therefore, it is highly advisable to inform herders about planned activities and their purpose before launching operations as they might have opposing ideas if they are not well informed. • One of the key concerns among herders is the scarcity of water in Govi. Therefore, the OHTL should not permanently obstruct herders' access to water wells. Any temporary access restrictions require mitigation. • It was highlighted that the best way to get information to the herders was through the <i>Bagh</i> general meetings. • The majority of the herders are locals; they know each other well and have strong communication links. • Herders obtain information about their area through their phones, community Facebook groups and <i>Bagh</i> Governors.

Stakeholder group	Key concerns, raised issues and engagement ideas
	<ul style="list-style-type: none"> Local herders are opposed to both mining companies and non-local users of summer pastures having access rights to the pasturelands they use.
Users of summer pastures from other <i>soums</i> and neighbouring <i>aimags</i>	<ul style="list-style-type: none"> Herders who use summer pastures from other <i>soums</i> and neighbouring <i>aimags</i> had no prior information about the Project. They have difficult relationships with local herders and they move from pasture to pasture every 2-3 days. They have difficult relationships with the local government. Herders who use summer pastures from other <i>soums</i> tend to be interested in receiving information about their local <i>soum</i> rather than the <i>soum</i> where they are residing. Local government officials refer to this attitude as “distant loyalty”.
People and businesses in the Project Area	<ul style="list-style-type: none"> People residing in the Project Area had no prior knowledge about the Project. The building of this OHTL line does not have high significance in the lives of <i>soum</i> residents as they already have a reliable, electrical source. The Project does not have a direct effect on the lives of the <i>soum</i> residents as it will not pass through the <i>soum</i> centre.
Mining concessions within the Project area of influence	<ul style="list-style-type: none"> Two mines in Dalanjargalan <i>soum</i> receive their electrical supply from Sumber <i>soum</i>. No meetings were held during the baseline study due to the halt of mining activities.
External stakeholders	
<i>Aimag</i> level Government / Administration	<ul style="list-style-type: none"> Two official letters were received from the Ministry of Energy. They also received information in May because the Citizen's Representatives <i>Khural</i> (Hural) had been determined to launch the Project. They were in favour of the Project. As it is a project implemented by the Government of Mongolia, they made commitments to focus on settling all issues concerning the Project as quickly as possible. Regular cooperation must be developed between the Project implementor and local government.
Investment, economy SME officials	<ul style="list-style-type: none"> They had prior knowledge about the Project. However, they did not have detailed information. They were in favour of the Project. Information about the Project location and how it fits in with other local government plans must be distributed which will help the local government effectively plan and use the new OHTL line. Attention must be paid on how the new OHTL connects to the prior electrical supply line.
Land, environment, agricultural officials	<ul style="list-style-type: none"> They had no prior information about the Project. Project implementor must make agreements with the local governments on waste management and water usage. Project implementor must discuss the location of the camp with the <i>Bagh</i> Governor(s).
Social policy, social welfare and employment officials	<ul style="list-style-type: none"> They had no prior information about the Project. There was feedback highlighting the importance of employing the local work force.
Health officials	<ul style="list-style-type: none"> They had no prior information about the Project. Special attention must be paid to protecting the health of the local population and livestock during the construction phase of the Project by avoiding excessive dust raising. Industrial accidents must be prevented during the construction phase of the Project. Cooperation with the local hospital must be developed in terms of immediate response in cases of industrial accidents.
Education and cultural officials	<ul style="list-style-type: none"> They had no prior information about the Project. Cooperation must be developed in terms of protecting and preserving local natural and cultural landmarks and discovery of historical findings.
<i>Soum</i> level Government / Administration	<ul style="list-style-type: none"> They were in favour of the Project. Mutual understanding and cooperation with inhabitants of the Project Area needs to be developed.
<i>Bagh</i> level leaders	<ul style="list-style-type: none"> They had no prior information about the Project.

Stakeholder group	Key concerns, raised issues and engagement ideas
	<ul style="list-style-type: none"> • More information about the Project must be distributed at the <i>Bagh</i> general meetings. • They said that herders are concerned about local birds, such as black kites (<i>milvus migrans</i>) and buzzards (<i>buteo lagopus</i>), which feed on field mice dying from exposure to the electrical lines. • They suggested that attention must be paid to avoid building OHTL lines in areas where wells, winter camps and spring camps of herders are located. • They suggested that all possible miscommunication and lack of communication must be avoided during Project launch and implementation because locals and herders may raise disputes regardless of the scale of the issue.
Regional Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs) - data provided by proxy on Dayar Mongol" NGO	<ul style="list-style-type: none"> • "Dayar Mongol" NGO, a NGO which carries out environmental protection activities in Mongolia has a branch in Dornogovi <i>aimag</i> through which they operate in the <i>aimag</i>. According to interviewed herders, they contact "Dayar Mongol" NGO directly about matters concerning the mines rather than the local government, which is an issue in Dalanjargalan <i>soum</i>. • Dalanjargalan <i>soum</i> established a non-governmental organisation to work in environment protection and monitoring consisting of three representatives from each <i>bagh</i>.
Local businesses and business organisations (Chamber of commerce)	<ul style="list-style-type: none"> • They had no prior information about the Project. • They were in favour of the Project. • There are many infrastructure, large-scale factories, electrical energy projects being implemented in Dornogovi, Govi-Sumber <i>aimag</i> during the last few years making it possible for small and medium enterprises to be developed and employment opportunities to increase. • There is expectation from local entities for electricity bills to decrease following the implementation of this large-scale, infrastructural, energy Project.

6. Future Stakeholder Engagement Programme

6.1. Introduction

This Chapter sets out the framework for the Stakeholder Engagement Programme for ongoing future engagement and disclosure, as part of the development and implementation of the Project. It covers the future stages of engagement, an outline engagement programme taking into account COVID-19 measures, and the key steps that should be taken to develop the detailed construction and operation SEP.

6.2. Stakeholder Engagement Program

The Stakeholder Engagement Programme comprises several phases which have been designed to correspond with the overall development phases of the Project:

- ESIA Disclosure and Consultation Phase;
- Pre-construction Phase;
- Construction Phase; and
- O&M Phase.

These are discussed in turn below.

6.2.1. ESIA Disclosure and Consultation

The Project ESIA Disclosure Package consists of documents developed to meet the requirements of EBRD ESP 2014, as follows:

- Non-Technical Summary (NTS);
- ESIA Report;
- This SEP;
- Environmental and Social Mitigation and Management Plan (ESMMP);
- Land Acquisition and Resettlement Framework (LARF); and
- Environmental and Social Action Plan (ESAP).

The purpose of the disclosure will be to ensure that stakeholders have the opportunity to make themselves aware of the environmental and social impacts that may occur and how the Project will avoid, minimise and / or manage these impacts; and feedback any concerns to the Project Team.

These documents will be provided in English and Mongolian. They will be posted on the EBRD website (www.ebrd.com) for a period of 120 days in line with EBRD requirements.

Hard copies of these documents will also be available at EBRD offices and the Ministry of Energy / NPTG offices in Ulaanbaatar, Mongolia.

NPTG also maintains a website¹⁴, which provides news updates, and Project information that is updated regularly and available in both English and Mongolian languages. The ESIA Disclosure Package will also be disclosed on NPTG's website.

The Ministry of Energy / NPTG will also publicly notify how both hard- and soft copies of the Project ESIA documentation can be accessed and comments provided, including electronically and in comment books at local Ministry of Energy / NPTG offices and through Ministry of Energy / NPTG staff as part of routine consultation activities.

As public consultation is not currently possible, hard copies of the NTS, SEP and LARF will be shared with the local administrations at the *aimag*, *soum* and *Bagh* level in Project-affected *soums* and *Bagh*'s for perusal by

¹⁴ National Power Transmission Company website. Available at: <http://transco.mn/#/en>.

interested parties. Where possible, a round of face-to-face meetings (using current safe social distancing practices) will be held with the key administration representatives and/or at *Khural* meetings; however, if this is not possible a telephone or web conference call will be organized.

The NTS will also be provided at the *aimag*, *soum* and *Bagh* level and a short summary poster provided that can be used on local Public Information Boards. These Boards can be established at community centres and governmental offices in the Project *soums*.

The format will be such that the same information can be used by NPTG on their website and provided at Ministry of Energy / NPTG local branch offices and customer service halls.

During the social fieldwork, most people suggested that using local Facebook groups is preferred for sharing information than media notices, therefore local Facebook groups will be used to disseminate Project information and availability of documentation. Key local Facebook pages are:

- FB group “Choir Zar – Чойр Зар”) – 41K members
- FB group “Дорноговь зар мэдээлэл” – 31K members
- FB group “Дорноговь зарын групп” – 27K members

Where necessary, phone calls will also be made e.g. to herders.

Where feedback is not possible through meetings or via telephone calls, the option to provide feedback forms and a feedback box will be provided at the local *soum* and *Bagh* levels and these forms will be collected by Ministry of Energy / NPTG for review. The Ministry of Energy / NPTG will also liaise with local *soum* and *Bagh* representatives to feedback any comments that may be captured in local meetings.

In addition, the Ministry of Energy / NPTG will liaise with national and local NGOs/CBOs, to seek their feedback – via meetings or telephone calls.

Following the disclosure period, an updated ESIA Report and associated documents will be prepared and issued on the EBRD website; and an updated NTS provided at the *aimag*, *soum* and *Bagh* level.

6.2.2. Pre-construction, Construction and O&M Stakeholder Engagement

Table 6-1 summarises the stakeholders, engagement methods and information to be disclosed during the Project pre-construction, construction and O&M phases. All affected people within the AoI will be consulted regularly throughout the Project lifetime.

The Programme will be reviewed regularly, at least quarterly during construction, and bi-annually during O&M, to ensure that it remains valid and meets the needs of the Client, the Project, local communities, and other relevant stakeholders as identified in this SEP. Subsequent versions of the SEP document will address the results that come from each engagement process and describe action plans in more detail.

Roles and responsibilities for developing and implementing the SEP are set out in Chapter 10.

6.2.2.1. Pre-construction phase

Prior to the start of construction, the Client, with support from the Project Implementation unit (PIU) will prepare a more detailed SEP (the “Project SEP”). This will include the following actions:

- **Development of a detailed list of stakeholders** - the Stakeholder List in Table 4-2 should be developed into a Stakeholder Register which provides a detailed list and contact database of stakeholders. This list will be developed through liaison with the local government. Further relevant stakeholders will be identified through referrals from other stakeholders and contact made by organisations expressing an interest in the Project. The Stakeholder Register should be updated thereafter at least annually.
- **Development of an Internal Communication Plan** - to cover guidance on internal and external communications. The Plan should enable the effective communication between the Client, PIU, EBRD and the Construction contractor on general Project related issues and ensure these parties are regularly updated on the status and activities of the Project.
- **Development of detailed Stakeholder Engagement Programme** - an outline Stakeholder engagement programme is provided in Table 6-1. This will need to be developed into a detailed engagement programme for the pre-construction phase, with responsibilities attributed to the Client /PIU and Construction Contractor. It should cover planned engagement activities, such as meetings or consultation events. Dates and locations for these events will be developed by the Client /PIU and the

Construction contractor, as appropriate. The schedule will include dates when key project information, such as construction commencement and annual reports, will be made publicly available.

The following will need to be taken into account in the development of the detailed Stakeholder Engagement Programme:

- Development of key messages tailored for each defined type of stakeholders.
- Design and production of communication material and awareness tools (e.g., brochures, hand-outs, leaflets, and press releases for media campaigns and media coverage).
- Any engagement activities that will be undertaken with other organisations or partnerships e.g. NGOs.
- Development of a detailed schedule outlining dates and locations when various stakeholder engagement activities will take place, when and who will attend.
- Development of the Project Grievance Mechanism and Complaints Database (see Chapter 7).

6.2.2.2. Construction phase

The Construction Contractor will be responsible for developing a detailed construction phase Stakeholder Engagement Programme, in alignment with the Project SEP. The programme should take into account the following:

- Information dissemination exercise on the construction programme and activities. This may involve the presentation of the information at appropriate community *fora* (*Hural* meetings, local Government meetings) in the soums and Bagh's located in the Aol.
- Disclosure of the Project Grievance Mechanism and contact details - local communities will also be fully informed of the grievance mechanism and how they can use it.
- Disclosure of the Contractor Code of Conduct to the local communities.
- Community health and safety awareness raising. Engagement will focus on general messages as well as a focus on high risk areas such as any construction works or access roads if these are located near the *soum* centres and high risk groups i.e. herders.
- Regular feedback to the local administrations and communities.

6.2.2.3. Operation and maintenance phase

The Stakeholder Engagement Programme for the O&M phase will be prepared by the NPTG, building on the actions identified for Construction, prior to the commencement of operations.

Table 6-1. Stakeholder Engagement Programme

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
ESIA Disclosure and Consultation								
1	All stakeholders	Disclosure of EBRD documents: ESIA, NTS, SEP, ESMMP, LARF and ESAP.	EBRD website Hard copies in Client / NPTG and EBRD offices in Ulaanbaatar NTS in local Client / NPTG branches NTS in local <i>aimag/soum/Bagh</i> centres Local Media, Radio and Newspaper Articles Public consultation <i>Khural</i> meetings	Leaflets for Information Boards Social media (Facebook)	Information disclosure may not reach all	Grievance Mechanism Small group meetings	EBRD / Client / NPTG	Upon completion of the ESIA.
2	All stakeholders	Gain feedback on ESIA Disclosure documents.	Public consultation <i>Khural</i> meetings	Telephone calls Social media (Facebook) Feedback forms and feedback boxes in the local <i>Baghs/ soums</i>	May not capture all feedback. Information may be misinterpreted if provided without discussion.	Grievance Mechanism Small group meetings	Client / NPTG	During disclosure of the ESIA.
3	NGOs and CSOs – national and local	Proactive engagement with relevant CSOs and gain feedback on the ESIA and LARF.	Formal correspondence / meetings	Local media, newspapers, radio Telephone calls Web calls Feedback forms	Approach does not provide opportunity for face-to-face feedback. Information may be misinterpreted if provided without discussion.	Grievance Mechanism Small group meetings	Client / NPTG	During disclosure of the ESIA.
4	Ministry of Environment and Tourism (MET)	Detailed Environmental Impact Assessment (DEIA) to obtain national approvals.	Hard copies to be submitted to MET offices	-	-	-	Client / NPTG / DEIA Consultant	Upon completion of the DEIA.

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
5	All stakeholders	Disclosure of final, updated ESIA Disclosure documents.	EBRD website Updated NTS provided at the <i>aimag, soum and Bagh</i> levels	-	-	-	-	Following the disclosure period.
Pre-Construction								
6	Affected people (Local communities, herder households, local businesses)	General pre-construction planning and site preparation prior to construction, including location of construction camps. Overall schedule of site preparation and construction, including sub-activities, key stages and potential stages of stakeholder interest. Information on safety measures, access and traffic management during construction. Targeted safety measures for vulnerable and high risk groups. Collect opinions and concerns. Disclosure of Community grievance mechanism.	Public meeting prior to the start of construction to include community health and safety awareness raising presentation FGDs for vulnerable and high risk people to discuss community health and safety issues Awareness materials Local Media, Radio and Newspaper Articles Grievance mechanism	Information Boards in <i>soum / bagh</i> centres Leaflet drops Telephone calls SMS texting Social media (Facebook) Feedback forms and feedback boxes in the local <i>Baghs/ soums</i>	Approach does not provide opportunity for face-to-face feedback. Information may be misinterpreted if provided without discussion.	Grievance Mechanism – via telephone if necessary Small group meetings	Client /	Prior to construction
7	<i>Khurals (aimag and soum)</i> Aimag and soum Government agencies	Approvals and permits. General pre-construction planning and site preparation prior to construction, including location of construction camps and use of quarries/borrow pits. Overall schedule of site preparation and construction, including sub-activities, key stages and potential stages of stakeholder interest, access requirements / constraints. Discuss any grievances.	Attendance at formal <i>Bagh</i> meetings Targeted meetings, as requested Awareness materials	Telephone calls Web calls	Approach does not provide opportunity for face-to-face feedback. Information to be passed on to communities may be missed.	Grievance Mechanism Small group meetings	Client /	Prior to construction
8	Herders	Specific consultation, including information on project components, in particular the use of a	Targeted meetings and FGDs with identified vulnerable	Telephone calls SMS texting	Approach does not provide opportunity for	Grievance Mechanism – via telephone if	Client /	Prior to construction

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
		construction workforce, safety issues / management, and also potential employment opportunities, including skills required and training opportunities, traffic management and access routes.	herder households prior to construction Provision of information materials Grievance mechanism	Feedback forms	face-to-face feedback.	necessary One-to-one meetings		
9	Potentially displaced herder households	Targeted consultation and surveys to identify (see LARF) where necessary, depending on final design, agreement on relocation of any structures e.g. wells.	Targeted meetings and FGDs with identified vulnerable herder households	Telephone calls SMS texting Feedback forms	Approach does not provide opportunity for face-to-face feedback. May not be easy for households to provide feedback forms.	Grievance Mechanism – via telephone if necessary One-to-one meetings	Client /	Prior to construction
10	Affected people Vulnerable groups Businesses / suppliers Industrial sector bodies Educational institutions General public	Upcoming construction phase employment opportunities, application processes. Project construction information (dates/schedule, safety notifications, activities).	Notices in shops, local offices etc. in each settlement Publication via local <i>Khurals (aimag and soum)</i> Awareness materials Local media / newspapers / radio Grievance Mechanism	Information Boards in <i>soum / bagh</i> centres Leaflet drops Telephone calls SMS texting Social media (Facebook)	-	Grievance Mechanism – via telephone if necessary One-to-one meetings	Client /	Prior to construction
11	Traffic police	Road safety.	Targeted meetings	Telephone calls Web calls Official Email/Written Letter	Inability to plan fully e.g. Emergency preparedness and response plan	Small group meetings	Client / / PIU / Contractors	Prior to construction
12	Health centres Police Fire brigade for	Development of Emergency Preparedness and Response Plan – availability of local resources emergencies.	Targeted meetings	Telephone calls Web calls Official Email/Written Letter	Inability to plan fully e.g. Emergency preparedness and response plan	Small group meetings	Client / / PIU / Contractors	Prior to construction

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
13	NGOs and CSOs – national and local	Provision of project information and awareness materials. Discussions on specific matters.	Formal correspondence / meetings Awareness materials Grievance mechanism	Local media, newspapers, radio Telephone calls Web calls Feedback forms	Approach does not provide opportunity for face-to-face feedback.	Small group meetings	Client / Contractor	Ad hoc / As required
14	Contractors	Contract information / Calls for Tender timing.	Tender documents – issued directly / via NPTG website	Telephone calls Web calls Official Email/Written Letter	-	Website Web calls	Client /	Prior to construction
15	EBRD	Formal correspondence in relation to environmental and social action plan (ESAP) compliance.	Formal meetings / correspondence	Telephone calls Web calls Official Email/Written Letter	-	Not applicable	Client /	Prior to construction
Construction Phase								
16	All stakeholders	Ongoing and upcoming employment opportunities, application processes.	Contractor and NPTG website Notices on information boards, shops, local offices in <i>soum/Bagh</i> centres Awareness materials Local media / newspapers / radio	Information Boards Grievance mechanism Telephone calls / SMS texting to local communities Social media (Facebook)	Approach does not provide opportunity for face-to-face feedback.	Grievance Mechanism – via telephone if necessary	Contractor	Bi-annual; and as required
17	Local communities	Inform on project implementation schedule / progress. Provide information on employment and applications. Regular engagement and notification of activities on and around site with community health and safety impacts (where applicable). Consult the local communities about their views / opinion on project implementation and impacts.	Group meetings at least twice during the construction period, or following a specific grievance Newsletters Grievance mechanism	Telephone calls SMS texting Social media (Facebook)	Approach does not provide opportunity for face-to-face feedback. Wider feedback may be missed.	<i>Khural</i> meetings Grievance Mechanism – via telephone if necessary	NPTG / Contractor	Monthly / as required (due to updates in e.g. programme) Annually

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
		Ensure awareness / availability of grievance mechanism and code of conduct.						
18	Herders Vulnerable groups	<p>Inform on project implementation schedule / progress.</p> <p>Provide information on employment and applications.</p> <p>Regular engagement and notification of activities on and around site with community health and safety impacts (where applicable).</p> <p>Consult the local communities about their views/opinion on project implementation and impacts.</p> <p>Ensure awareness / availability of grievance mechanism and code of conduct.</p>	<p>FGDs/KIIs</p> <p>Newsletters</p> <p>Grievance mechanism</p>	<p>Telephone calls</p> <p>SMS texting</p>	Approach does not provide opportunity for face-to-face feedback.	<p>Grievance Mechanism – via telephone if necessary</p> <p>One-to-one meetings</p>	Client / Contractor	<p>FGDs/KIIs – at least twice during construction works or at a frequency agreed with local <i>aimag/soum/Bagh</i> or directly with relevant persons</p> <p>Other items - monthly / as required</p> <p>Bi-annual updates</p>
19	If relevant, physically or economically displaced herder households	<p>Inform on project implementation schedule / progress.</p> <p>On-going engagement related to any issues of compensation measures and grievances.</p>	One-to-one meetings	<p>Telephone calls</p> <p>SMS texting</p>		<p>Grievance Mechanism – via telephone if necessary</p> <p>One-to-one meetings</p>	Client /	As required
20	Employees	<p>Code of Conduct.</p> <p>Inform of Project policy / plans in relation to stakeholder engagement and communities.</p> <p>Inform on external grievance mechanism.</p> <p>Inform on internal Labour grievances.</p>	<p>Training e.g. Code of Conduct</p> <p>Information boards at construction camps and work sites</p> <p>Meetings in construction camp</p> <p>Awareness materials</p> <p>Labour grievance mechanism</p>	<p>Smaller group training sessions</p> <p>Online training (depending on skills set)</p>	Project workforce will not be able to work if significant restrictions are in place, therefore it is assumed that the alternate methods can be employed, or not work will proceed	Labour grievance mechanism – via telephone if needed	Contractor	<p>Induction of employees, prior to them starting work on site</p> <p>Regularly during construction</p>
21	All stakeholders	<p>Schedule of construction works.</p> <p>Construction activities.</p> <p>Progress of construction.</p>	<p>Notices on information boards, in shops, local offices in the relevant <i>soum</i></p>	<p>Information Boards</p> <p>Telephone calls</p> <p>SMS texting</p>	-	-	Client / Contractor	Ad hoc / As required

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
		Construction impacts and mitigation measures (with opportunities for feedback) Ensure awareness / availability of grievance mechanism	centres <i>Bagh</i> meetings Awareness materials delivered to local businesses / residents through leaflets Local media, radio, newspapers Grievance mechanism	Media Social media (Facebook)				
22	National government agencies	Inform on Project progress / provide detailed information.	Formal correspondence / meetings	Telephone calls Web calls Official Email/Written Letter Feedback forms	Approach does not provide opportunity for face-to-face feedback.	Website Web calls	Client /	Bi-annually; and as required
23	<i>Khurals (aimag and soum)</i> <i>Aimag and soum</i> Government agencies	Inform on Project progress / provide detailed information. Regular engagement and notification of activities on and around site with community health and safety impacts (where applicable). Permits as required. Material use requirements (water, aggregates, energy, etc). Discuss grievances.	Formal correspondence / attend meetings KILs Awareness materials Grievance mechanism	Telephone calls Web calls Awareness materials Feedback forms	Approach does not provide opportunity for face-to-face feedback. Information to be passed on to communities may be missed.	Grievance Mechanism – via telephone if necessary Small group meetings	Client / / Contractor	Report feedback once a month Bi-annual reports
24	Media	Detailed project information on request.	Formal correspondence	-	-	-	Client / / Contractor	Ad hoc / As required
25	Community groups	Provision of project information and awareness materials. Discussions on specific matters.	Formal correspondence / meetings Awareness materials Grievance mechanism	Local media, newspapers, radio Telephone calls Web calls Feedback forms	Approach does not provide opportunity for face-to-face feedback.	Website Grievance Mechanism – via telephone if necessary	Client / / Contractor	Ad hoc / As required

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
26	NGOs and CSOs – national and local	Provision of project information and awareness materials. Discussions on specific matters.	Formal correspondence / meetings Awareness materials Grievance mechanism	Local media, newspapers, radio Telephone calls Web calls Feedback forms	Approach does not provide opportunity for face-to-face feedback.	Website Grievance Mechanism – via telephone if necessary	Client / / Contractor	Ad hoc / As required
27	EBRD	Formal correspondence in relation to environmental and social action plan (ESAP) compliance.	Formal meetings / correspondence	-	-	-	Client / / PIU	As required.
28	Health centres Police Fire brigade	Communicate Emergency Preparedness and Response Plan and availability of services locally.	Targeted meetings	Telephone calls Web calls Official Email/Written Letter	Approach to emergency preparedness is not fully understood or tested	Small group meetings	Client / / Contractor	Regular basis, as agreed with organisations
O&M Phase								
29	Employees	Code of Conduct. Inform on internal HR grievance mechanism.	Training Grievance mechanism	Smaller group training sessions Online training (depending on skills set)	-	Labour grievance mechanism – via telephone if needed	NPTG	Regularly during operation
30	All stakeholders	Employment opportunities and skills required / sub-contracting opportunities during operation.	Advertisements within regional employment publications Information boards	Contractor and NPTG website Grievance mechanism Telephone calls / SMS texting to local communities Social media (Facebook)	Approach does not provide opportunity for face-to-face feedback.	Grievance Mechanism – via telephone if necessary	NPTG	During operation, as required
31	NGOs and CSOs – national and local	Discussions on specific matters / feedback on ongoing community issues.	Formal correspondence / meetings Awareness materials Grievance mechanism	Local media, newspapers, radio Telephone calls Web calls Feedback forms	Approach does not provide opportunity for face-to-face feedback.	Website Web calls	NPTG/ Contractor	Ad hoc / As required

ID	Target Stakeholder / Group	Purpose / Information to be Disclosed	Planned Method	Proposed Additional / Alternate Methods for COVID-19 (Short Term)	Limitations	Proposed Alternate Methods (Long Term - Deferred)	Responsible Parties	Schedule / Frequency
32	Local communities Herders	Disseminate information about health and safety in relation to OHTLs.	Public consultation FGDs/KIIs Grievance mechanism	Telephone calls SMS texting Newsletters	Approach does not provide opportunity for face-to-face feedback.	Small group meetings or one-to-one meetings	NPTG	End of construction / beginning of operation
33	Potentially displaced or affected herder households	RAP/LRP close out audit to review the RAP/LRP process and confirm whether all compensation measures have been satisfactorily disbursed/provided.	FGDs/KIIs	Telephone calls SMS texting Grievance mechanism	Approach does not provide opportunity for face-to-face feedback.	One-to-one meetings	NPTG / Independent Auditor	End of construction / beginning of operation
34	EBRD	Formal correspondence in relation to environmental and social action plan (ESAP) compliance	Formal meetings / correspondence	-	-	-	NPTG	As required.
35	Health centres Police Fire brigade	Communicate Emergency Preparedness and Response Plan and availability of services locally	Targeted meetings	Telephone calls Web calls Official Email/ Written Letter	Approach to emergency preparedness is not fully understood or tested	Small group or one-to-one meetings	NPTG	Regular basis, as agreed with organisations

7. Grievance Mechanism

7.1. Introduction

A formal community *Grievance Mechanism* will be implemented to ensure that relevant parties (NPTG/PIU/Contractors) are responsive to any concerns and complaints, particularly from affected people and communities; and to ensure that there is a central approach and record of grievances.

Special attention will be paid to the training of designated staff involved in the management of the *Grievance Mechanism*. This *Grievance Mechanism* covers non-employees (i.e. affected people and other relevant stakeholders such as local communities). A separate internal grievance procedure for Project employees/workers will be provided.

7.2. Grievance Policy

The NPTG has a *Grievance Policy* that commits to handling any grievances from its stakeholders about its operations in a professional and timely fashion.¹⁵

7.3. Grievance Mechanism

7.3.1. Purpose

The *Grievance Mechanism* describes the way the Project and community can work together to find solutions to grievances. It provides for a fair hearing and procedural justice, access to information and access to a fair remedy – without fear of retaliation.

7.3.2. Goals

In addition to serving as a platform to resolve grievances, the *Grievance Mechanism* has been designed to help achieve the following goals:

- To be respectful of complainant culture, values, traditions and views;
- To be gender-sensitive, safe, confidential, and apt to respond to potential reports of gender-based violence and harassment;¹⁶
- To provide open channels for effective communication;
- To resolve grievances at the local level and in a timely manner;
- To identify the root causes of grievances and address systemic issues;
- To provide a process that is dialogue-based, with the complainant and the Project (Client and/or Construction Contractor) cooperating in the investigation, discussion, resolution and announcement of the grievance and result;
- To ensure fair, equitable and consistent outcomes to resolve grievances;
- To enhance and continuously improve the ability of the Project to fairly address community concerns.

7.3.3. Scope

The *Grievance Mechanism* is primarily for the community to raise relevant concerns about the Project activities. The concerns raised should be a direct result of the Project's activities. The concerns must be raised by the person / people who are directly affected by the particular complaint with the Project's activities.

The *Grievance Mechanism* is consistent with the requirements of EBRDs PR10 and GIP and respects Mongolian laws and regulations. The Project proposes to receive grievances at a local level to then be addressed by the Project (i.e. Client or the Construction Contractor), before the grievance is escalated, if applicable, to a judicial or other national process. Residents' complaints or concerns (related to the community)

¹⁵ Available at: <http://www.transco.mn/#/contact>.

¹⁶ The person(s) responsible for receiving and/or responding to reports of gender-violence, sexual harassment, abuse or exploitation, need(s) to be adequately trained, to ensure the survivor or witness reporting an incident is safe and has access to the necessary support services.

are taken to the *bagh* or *soum* representatives for resolution. The *Grievance Mechanism* therefore proposes to maintain this grievance channel as the community members are familiar with it, in addition to the options of lodging grievances directly with Client or the Construction Contractor. The proposed mechanism for the *bagh* or *soum* representatives to then raise the grievance with the Client or the Construction Contractor is set out within the Grievance Procedure in section 7.4; though final agreements will need to be made between the Client, Construction Contractor and the local *bagh* or *soum* representatives.

The *Grievance Mechanism* will be accessible to all members of the community. In a situation where an affected person is not satisfied with the *Grievance Mechanism* decision, the Mongolian legal system can be approached for redress.

7.4. Grievance Procedure - Steps

All grievances will be:

- Acknowledged within 5 working days of receipt, by the organisation receiving the grievance.
- Where the local *bagh* or *soum* receive the grievance, they will raise this with the Client and Construction Contractor within 24 hours.
- The Client or Construction Contractor (as agreed between both parties as relevant to the grievance) will respond within no later than 10 working days of the Complaint Date.
- The Client or Construction Contractor (as relevant) will implement the solution within 7 working days of redress solution being agreed; or, where longer is required, within a timeframe agreed together with the aggrieved person.

During construction, specifically, nominated and trained members of the Construction Contractor staff will record grievance information in a grievance database and share this with the Client. This will include:

- Stakeholder name and contact details (unless anonymity is requested).
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

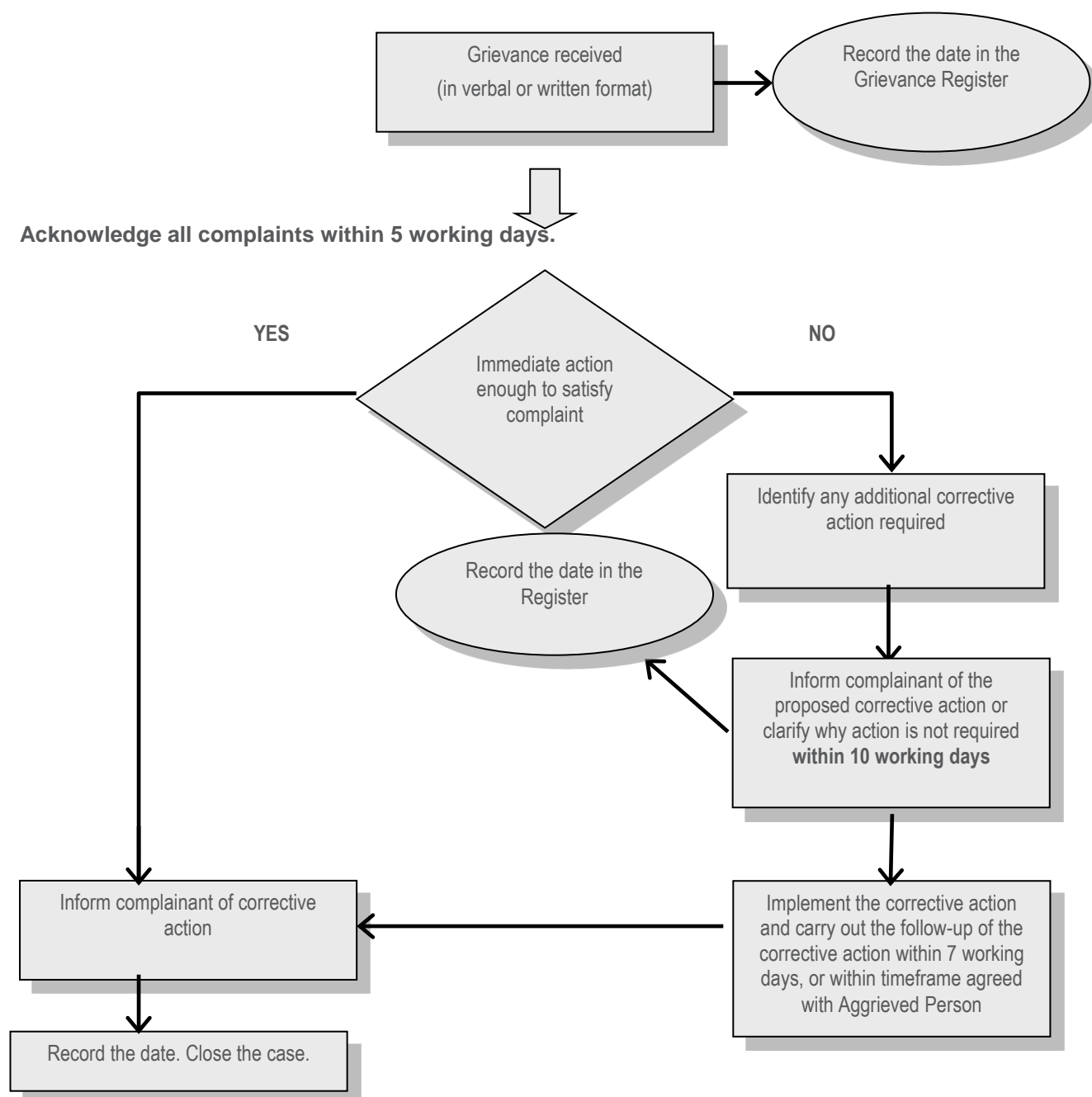


Figure 7-1. Grievance Procedure

7.4.1. Step 1: Register a Grievance

If a concern arises, the aggrieved person(s) can lodge grievances with the Contractor Community Liaison Officer (CLO), Client or the *bagh/soum* level nominated Community Relations person, verbally or in writing (letter, e-mail or on the Project Grievance Form (see Appendix B). Where the complaint is received first at the *bagh/soum* level, the nominated *bagh/soum* person will contact the Contractor CLO (CLO) to inform them of the grievance within 24 hours.

Contact details should be provided to the local communities as follows:

Client	Contractor CLO	Bagh/Soum Nominated Person
Attention:	Attention:	Attention:
Postal Address:	Postal Address:	Postal Address:
Tel:	Tel:	Tel:
Fax:	Fax:	Fax:
Email:	Email:	Email:
Company Website:	Company Website:	Company Website:

All complaints will be recorded at the point of contact on a Grievance Form (Appendix B). During construction, the Contractor CLO will maintain a Central database of grievances (Appendix C) which will be shared with the Client.

In the event that a complaint is raised verbally, the representative person registering the complaint must obtain the approval of the aggrieved person that the information documented is correct (e.g. by way of signature of the Receipt of Grievance Form). However, aggrieved persons can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

The grievance form should record the nature of the grievance, the date when it occurred and the name and contact details of the aggrieved person.

If self-identified, the complainant will receive a grievance receipt confirmation letter from the Contractor CLO explaining the next steps to be taken, and a copy of the signed grievance resolution form.

7.4.2. Step 2: Grievance Investigation

Within 5 working days of receiving the Grievance, the Contractor CLO will provide a written acknowledgement of the grievance including the name of the person to contact about progress, an explanation of the steps that will be taken to investigate, discuss and resolve the grievance, and an anticipated timetable for processing the grievance, as appropriate.

The Contractor CLO, together with the Client and as relevant, the /Community Relations person, will:

- Identify the parties involved.
- Clarify issues and concerns raised by the grievance through direct dialogue (if possible).
- Classify the grievance in terms of seriousness according to the severity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue.
- Convene a staff group with expertise relative to the grievance to conduct an internal investigation of the grievance.
- If required, gather views of other stakeholders, including those of the Project proponent/Contractor and if necessary, an agreed neutral technical opinion.
- Prepare an investigation report that examines the grievance, including its source, evidence, consequences, any financial and other risk implications, and any recommended corrective measures.
- Based on the investigation report, issue a written response to the aggrieved person within 10 days that outlines the corrective measures.
- Conduct any measures, as agreed.

7.4.3. Step 3: Grievance Resolution

There are five grievance resolution levels:

(i) If the grievance is not identified as legitimate or resulting from Project activities, then the aggrieved person will be informed by the Contractor CLO that the grievance is not accepted and will be provided with a copy of the grievance form, along with supporting documentation and evidence, outlining the reasons for grievance closure.

(ii) If the grievance is identified as legitimate and can be resolved quickly, possible solutions will be immediately discussed by the Contractor CLO (and other representatives as seen relevant) with the aggrieved person and, if the aggrieved person agrees to the resolution, it will be documented on the grievance resolution form by the Contractor CLO and a date by which to solve it will be agreed.

(iii) If the grievance is identified as legitimate, but the aggrieved person does not agree with the proposed solution or if no solution is readily available, then the by the Contractor CLO will undertake further evaluation, including drawing on external expertise where required, as the basis for proposing alternative resolutions. This will be documented on the grievance resolution form by the Contractor CLO and the complainant will be informed of their rights and the steps to arrive at a resolution within an agreed timeframe.

(iv) If the grievance is identified as legitimate, but further evaluation does not result in satisfactory resolution of the grievance, then the grievance will be referred by the Contractor CLO to a mutually agreed upon third-party to mediate, evaluate and propose non-binding resolution of the grievance. Other third parties include external experts, NGOs, legal advisors, and university staff, where this is deemed more appropriate by the Project and/or the aggrieved person.

(v) If all Project and third-party attempts to resolve the grievance and avoid legal action have been exhausted, then the aggrieved person will be clearly advised by the Contractor CLO as to their constitutional right to have access to the civil law court to seek legal redress of their grievance and the project will in no way impede the access of the aggrieved person to these legal mechanisms.

7.4.4. Acknowledgement of a Satisfactory Process

At the resolution stage of a grievance negotiation, the by the Contractor CLO will ask the aggrieved person to complete a form where the aggrieved person assesses the way the grievance was handled. This form will refer to the goals of the Grievance Mechanism and ask the AP if their experience of the grievance process is aligned with the goals the Project has set. For example, the following questions will be asked:

- Did the Project and its representatives act in a respectful manner?
- Did the Project do all it could to resolve the grievance locally?
- Did the Project look for the underlying cause of the issue you have raised?
- Did you feel an equal partner in the process of resolving your grievance?
- Is the resolution of your grievance fair and consistent with similar resolutions in the same area?

This feedback will help the Project to adjust and improve the Grievance Procedure.

7.4.5. Processing Timeline

The Project will endeavour to address grievances in accordance with the following timeframes:

- **Registration of grievance** - within 24 hours of grievance receipt;
- **Acknowledgment of grievance** – within 5 working days;
- **Grievance resolution approach** – the approach proposed will be identified and the aggrieved person notified of the proposed approach within 10 working days.
- **Grievance resolution** – implementation of the corrective action and carry out the follow-up of the corrective action within 7 working days, or within timeframe agreed with Aggrieved Person.
- **AP resolution satisfaction assessment** - within 15 days of resolution closure.

7.5. Disclosure of the Grievance Procedure

The *Grievance Procedure* will be made public through:

- This SEP and a local poster;
- Local information boards (as applicable);
- Through community meetings;
- By informing the Hurals and Governors; and
- Regular reporting/awareness raising to the Community.

7.6. Managing and Tracking Grievances

The Client will appoint a CLO to monitor delivery of the *Grievance Procedure* during construction by the Construction Contractor. The Contractor CLO and *bagh/soum* level Community Relations person will work with the Client CLO.

The Construction Contractor will be expected to follow this *Grievance Procedure*. The Construction Contractor CLO will maintain the Community Grievance Register and share this with the Client. All transactions including registration of the grievance and the progress to outcome will be recorded.

The Contractor shall ensure that all construction workers are aware of the Grievance Procedure.

The Construction Contractor shall not reach any direct agreements or resolution with the complainant(s) without prior coordination of such actions with the Client CLO.

The Client CLO will conduct regular audits on the Construction Contractor to ascertain compliance with this *Grievance Procedure*.

8. Monitoring

8.1. Introduction

The monitoring measures that are to be implemented to assess compliance with Project SEP are described in this Chapter. Monitoring the results of stakeholder engagement activities and evaluating the effectiveness of the Stakeholder Engagement Programme and Grievance Mechanism to bring to light potential areas for improvement are important aspects of the engagement process. In brief the process of monitoring and evaluation provides information such as whether:

- The activity is achieving the desired goals;
- The implementation conforms to the initial wider and specific goals;
- The implementation is progressing towards the expected results; and
- The timeframe is respected.

In the event that monitoring identifies non-conformance with the Project SEP, these will be investigated, and appropriate corrective actions identified and implemented.

8.2. Key Performance Indicators

Table 9-1 summarises the Key Performance Indicators (KPIs) and associated key management controls that can be used to assess the progress and effectiveness of proposed stakeholder engagement strategies and activities.

Table 8-1. Key Performance Indicators

ID	KPI	Target	Monitoring Measure
SEPKPI01	Number of grievances	Total number reduced year on year	Grievance Register
SEPKPI02	Number of grievances resolved within one month	Target of 90%	Complaints Log / Database
SEPKPI03	Reporting back to stakeholders on implementation of the <i>Grievance Procedure</i>	Delivery of quarterly reports to stakeholders on the outcomes of the <i>Grievance Procedure</i>	Reporting
SEPKPI04	Auditing SEP and <i>Grievance Procedure</i> to ensure they are being implemented	Bi-annual audit complete Target 90% of grievances closed-out to satisfaction of complainant within 30 days	Audit report
SEPKPI05	Number of satisfaction assessment forms filled in by aggrieved persons	Target 90% of aggrieved persons have filled in a satisfaction form	Reporting
SEPKPI05	Number of community members in attendance at engagement activities	Participant numbers meet / exceed targeted attendance at activities	Stakeholder Engagement Register / Programme
SEPKPI06	Number of engagement records completed	100% of engagement activities recorded (including informal engagement)	Stakeholder Engagement Register
SEPKPI07	Number of engagements with vulnerable households	100% completion of planned engagement activities	Stakeholder Engagement Database

8.3. Key Monitoring Activities

The monitoring measures that are to be implemented for stakeholder engagement to ensure compliance with this SEP are described in Table 9-2.

Table 8-2. Monitoring measures

ID	Topic / Aspect	Method(s)	Responsible Parties	Frequency
SEPM01	Community Grievances	Review Grievance Register, including grievances closed and those unresolved per period (at a minimum monthly but more likely as they occur) to include: <ul style="list-style-type: none"> • number of outstanding complaints and grievances opened in the month; • number of grievances opened in the month and evolution since Project start (graphic presentation); • number of grievances closed in the month; and • type of grievance. 	Contractor CLO	Monthly
SEPM02	Community engagement activities	Provide reporting back to the community on the treatment of community grievances (including the type of grievance, how they have been addressed and the outcomes arising).	Contractor CLO / NTPG CLO	Quarterly
SEPM03	Community engagement activities	A bi-annual audit will be conducted of the Grievance Mechanism.	NTPG CLO	Bi-annually
SEPM04	Community engagement activities	Record formal and informal engagement with local communities in Stakeholder Engagement Register. Summarise in Monthly HSE performance report.	Contractor CLO	Monthly
SEPM05	Community engagement activities	Keep records of the types of information materials prepared and distributed, by location and report to the Client CLO monthly.	Contractor CLO	Monthly
SEPM06	Community engagement activities	Monthly monitoring of the Construction Contractor performance in relation to the Grievance mechanism. Monthly monitoring of the bagh/soum Community Relations persons to ensure that grievances are being raised to the Project in an accurate and timely manner.	NTPG CLO	Monthly

8.4. Review and Revision of this Plan

This SEP will be reviewed during construction at a minimum of every six months, or at a frequency agreed with EBRD and the PIU. During steady state operations, this SEP will be reviewed on a bi-annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of the Project. The SEP may also be updated on an “as required” basis in response to changes in planned works, etc.

9. Audit and Reporting

9.1. Auditing

Internal, Contractor and External auditing will take place as follows:

9.1.1. Internal Auditing

Conformance with the SEP will be subject to internal inspection regularly, and audit on a bi-annual basis. Conformance will be monitored via a bi-annual internal audit programme. This internal auditing will apply to the Client /PIU in relation to their overview of the overall Project SEP process; and internally to Contractors who will be expected to monitor their own compliance to the required actions.

9.1.2. Contractor Auditing

The Construction Contractor will be subject to inspection and audit prior to a Contractor's initial appointment and then on a monthly basis to ensure their compliance with SEP implementation and management and reporting of grievances that are directly raised with the contractor.

The *bagh/soum* Community Relations person will also be audited by the PIU monthly to ensure that grievances are being recorded and raised in accordance with the Grievance Procedure; and that the Community Relations representatives are communicating these grievances with the Contractor CLO and the Client /PIU.

9.1.3. External Auditing

Conformance with the SEP and Grievance Procedure will be subject to periodic assessment by external auditors (e.g. the EBRD), as required.

9.2. Stakeholder Engagement and Grievance Database

All stakeholder contact details, engagement activities and all stakeholder grievances will be maintained within a *Stakeholder Engagement Register* (Appendix D) and *Grievance Register* (Appendix D) to allow tracking and monitoring of the engagement process and all complaints received. Minutes of all meetings will be recorded (Appendix E).

- Name and contact details (in cases where anonymity is requested a reference code or number will be used);
- Date of contact;
- Method;
- Complaints received;
- Cause of complaint (comment, suggestion, complaint ...);
- Proposed response and actions to be taken; and
- Status (registered, active, closed).

9.3. Reporting

All feedback from stakeholder engagement activities will be documented and reported, covering:

9.3.1. Weekly / Monthly Reports

The Construction Contractor will prepare weekly and monthly reports to be submitted to the Client /PIU, which include the key monitoring measures outlined above, including:

- Engagement activities conducted during each week/month;
- Grievances addressed by the contractor; and
- Plans for the next month and longer-term plans.

9.3.2. Bi-Annual Reports

The Client /PIU will compile a report summarising stakeholder engagement and grievance management results on a bi-annual basis during construction. This will be prepared by the NPTG during operation. This report will provide a summary of all public consultation and engagement, grievances, resolution and outcomes.

9.4. Record-Keeping

A central record of audits, inspections and registers will be held by the Client /PIU. The Construction Contractor will be expected to hold their own database during construction, that will be shared with the Client /PIU.

10. Resources and Responsibilities

10.1. Introduction

The Client has overall responsibility for the SEP development and implementation across the Project lifecycle. During construction, they will be assisted by a PIU that will be set up in the Client office to manage Project implementation. Contractor(s) will be commissioned to deliver the Project and the construction phase stakeholder engagement and grievance mechanism. This Chapter sets out the roles and responsibilities between these different entities.

10.2. Key Roles and Responsibilities for SEP Implementation

Principal roles and responsibilities for the implementation of the SEP are outlined below.

Table 10-1. Key Roles and Responsibilities

Role	Responsibilities
Client / NPTG	<p>The Client will have overall responsibility of the development prior to and implementation during construction of the Project SEP, in accordance with any requirements of the Loan Agreement.</p> <p>During operation, the NPTG will be responsible for developing and implementation of the Operation and Maintenance (O&M) SEP. Where necessary, engagement activities will be undertaken by O&M contractors, under the review of the NPTG.</p>
PIU CLO	<p>A PIU will be set up following the Loan Agreement signing. The PIU will support the Client, through the apportionment of a CLO, in monitoring all stakeholder engagement activities, including those of Construction Contractor and the Local Administration Community Relations persons, and ensure the consistency of information provided to stakeholders by the various parties.</p> <p>Other responsibilities will include supporting the oversight of the stakeholder engagement process and auditing of any Contractor stakeholder engagement activities; managing project interfaces with the <i>baghs</i>, <i>soums</i> and <i>aimags</i>, and Contractor.</p> <p>The PIU CLO will maintain a central database of all Project engagement and grievances, based on the information provided by the Contractor and the Community Relations persons.</p> <p>The PIU will be responsible for ensuring that the Contractor is aware and has a copy of the Project SEP and develops a detailed SEP/Construction Engagement Programme in line with this Project SEP.</p>
Contractor CLO	<p>The Contractor will identify a CLO within their organisation who will be responsible for stakeholder engagement and grievance during construction.</p> <p>The Contractor will be required to develop and deliver a detailed SEP/Construction Engagement Programme for the construction phase, for Client /PIU approval.</p> <p>The Contractor will also be responsible for managing the Grievance Mechanism during construction. With oversight from the Client /PIU.</p> <p>The Contractor CLO will manage the grievance database.</p>
Community Relations persons (Bagh/Soum)	<p>Responsible for assisting in the implementation of the Grievance procedure at a local level during construction. They will be the key contact point for residents who want information about the Project or who have an issue they would like to discuss. These representatives will be responsible for recording grievances and raising these with the Contractor CLO within 24 hours of receipt.</p>

Appendices



Appendix A. Interview Questions

Appendix B. Project Grievance Form

Reference Number (Protocol Number)	
Name/Surname <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	
Date of complaint:	
Contact information Please check how you want to be contacted	<input type="radio"/> by postal mail <input type="radio"/> by telephone <input type="radio"/> by e-mail
Please indicate the language you want to be contacted in	
Description of incident or grievance: What happened? Where did this happen? who did it happen to? what is the result of the issue?	
Date of incident or grievance:	
	<input type="radio"/> Once <input type="radio"/> More than one time <input type="radio"/> On going
What would you like to see happen to settle the issue?	

Appendix C. Grievance Register Template

Appendix C. Grievance Register Template

[illegible]

Appendix D. Stakeholder Register Template

Name/Contact details	Client / PIU Staff Responsible (name and role)	Position Method of engagement	Contact details	Topic	Issues	Follow up required

Appendix E. Minutes of Meeting Template

Minutes of Meeting	
Date of consultation	
Type of consultation	<input type="radio"/> Face to face <input type="radio"/> Discussion groups <input type="radio"/> Public meeting <input type="radio"/> Press Conference <input type="radio"/> Other
Location address	
Town/Village Address	
Stakeholder Contact Person	
Stakeholder Individuals or Groups	
Representatives	
Other Attendants	
Confidential	<input type="radio"/> yes <input type="radio"/> no
Discussion zone	
Issue	
Grievance, nuisance or complaint	
Annexes	

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