

# **Sainshand – Tsagaan Suvarga Transmission Line Project**

Environmental and Social Impact Assessment  
Stakeholder Engagement Plan

DECEMBER 2025





## Sainshand – Tsagaan Suvarga Transmission Line Project

### Stakeholder Engagement Plan

Author	Adam Khan
Checker	Tserenkhand Gurbadam
Reviewer	Katie Prebble
Approver	Rachael Bailey
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## Abbreviations

Abbreviation	Definition
Aimag	<i>Mongolian</i> Eng. Capital city
Aol	Area of Influence
AP	Aggrieved person
Bagh	<i>Mongolian</i> Eng. District
CBOs	Community-Based Organisations
CLO	Community Liaison Officer
CSEP	Construction Stakeholder Engagement Plan
EBRD	European Bank for Reconstruction and Development
DEIA	Detailed Environmental Impact Assessment
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
ESMP	Environmental and Social Management Plan
EU	European Union
FGD	Focus Group Discussion
GIP	Good International Practice
GoM	Government of Mongolia
HH	Household
HR	Human Resources
Khural	<i>Mongolian</i> Eng. Parliament
IPAM	Independent Project Accountability Mechanism
KII	Key Informant Interview
km	kilometre
KPI	Key Performance Indicator
LARF	Land Acquisition and Resettlement Framework
LARP	Land Acquisition and Resettlement Plan

Abbreviation	Definition
LLC	Limited liability company
m	metres
mm	millimetres
NGO	Non-Governmental Organisations
NTS	Non-Technical Summary
O&M	Operation and Maintenance
PIU	Project Implementation Unit
PWD	People with disabilities
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SME	Small and medium sized enterprise
Soum	<i>Mongolian</i> Eng. District
UNECE	United Nations Economic Commission for Europe

# 1 Introduction

## 1.1 Background

- 1.1.1 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 204 kilometre (km) double circuit 220 kilovolt (kV) overhead transmission line (OHTL) in Dornogovi aimag (province). The 204km OHTL and substation connections are herein referred to as 'the Project'. The location of the Project is shown in **Figure 1-1** overleaf.
- 1.1.2 The electricity generation and transmission network in Mongolia consists of the four independent energy systems, with the Project sitting within the Central Energy System (CES). The existing power transmission and distribution infrastructure in Mongolia is characterised by aged infrastructure, is inefficient and unreliable with major losses along transmission lines and is undergoing rehabilitation and upgrade. In 2024, the CES transmission and distribution loss accounted for 11.67%. The aim of the Project is to eliminate power grid capacity shortages and ensure reliable power supply for development projects in the Gobi Region.
- 1.1.3 The EBRD has categorised the Project as a Category A, which means that as part of the Environmental and Social Impact Assessment (ESIA) Disclosure Package, a separate Stakeholder Engagement Plan (SEP) must be prepared. This document presents the SEP for the Project, in accordance with EBRD's Performance Requirement (PR) 10 *Information Disclosure and Stakeholder Engagement* and the EBRD's *Environmental and Social Policy* (ESP) 2019.

## 1.2 Project Implementors

- 1.2.1 The Project implementing entity is the Ministry of Energy (MoE). The MoE is responsible for overseeing and managing the overall execution of the Project in accordance with EBRD's standards, financing agreements, and applicable national regulations. The MoE appointed a dedicated Project Implementation Unit (PIU) to serve as the main point of contact for coordination and communication with EBRD and consultants.
- 1.2.2 The National Power Transmission Grid (NPTG) is a state-owned power transmission utility that is responsible for the operation and maintenance of all 22kV, 35kV, 110kV and 220kV substations and overhead transmission lines in Mongolia. It will be responsible for operation of the Project.

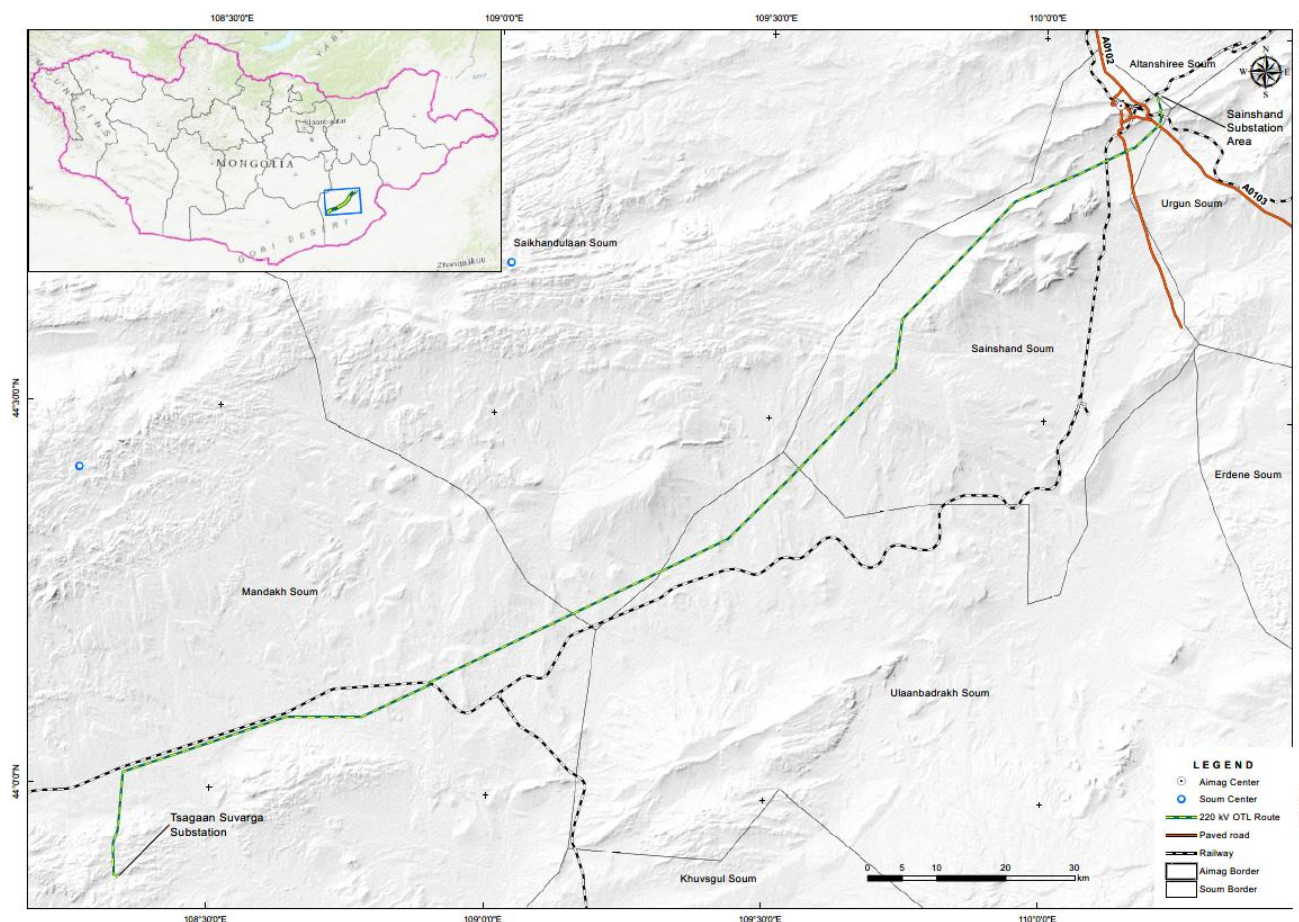


Figure 1-1 Project Location

## 1.3 Stakeholder Engagement Plan

1.3.1 The EBRD considers information disclosure and stakeholder engagement to be an ongoing process which should be started at the earliest stage of Project preparation and continued during its implementation and operation. Stakeholder engagement and consultation are undertaken with the aims of informing and improving Project decision-making and building understanding by actively involving individuals, groups and organisations in the Project.

1.3.2 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.
- Highlight stakeholder engagement that has been undertaken to date.
- 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 consultation is taken into consideration in developing the Project.

- Define roles and responsibilities for stakeholder engagement activities and outline how engagement will be integrated across the Project.
- Define stakeholder engagement monitoring and reporting procedures; and
- Provide a grievance management mechanism through which stakeholder suggestions and concerns are captured and responded to in a constructive and timely manner.

1.3.3 This SEP is a live public document which sets out Project commitments relating to stakeholder engagement, consultation and disclosure activities. In accordance with the objectives above, this SEP aims to document the stakeholder engagement activities and results to date and document stakeholder engagement during the Project's subsequent phases of construction and operation and maintenance (O&M).

1.3.4 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. Further details on disclosure are set out in **Section 6**.

## 1.4 SEP Content

1.4.1 This SEP is set out as follows:

- Section 2 - Project description: Project location, design and phases.
- Section 3 - EBRD and national stakeholder engagement and information disclosure requirements.
- Section 4 - Approach to, and the identification of, Project stakeholders.
- Section 5 - Engagement undertaken to date.
- Section 6 - Proposed programme and method of future stakeholder engagement.
- Section 7 - Grievance Redress Mechanism (GRM) procedure and timeframe.
- Section 8 - Key performance indicators (KPIs) and monitoring measures.
- Section 9 - Audit and reporting requirements; and
- Section 10 - Resources and responsibilities for SEP development and implementation.

## 1.5 Change Control

1.5.1 This SEP presents the Project SEP which has been prepared as part of the ESIA process. Prior to construction, the MoE and the PIU will update this Project SEP as necessary to reflect any further engagement that has been undertaken as part of the Project development.

1.5.2 The Construction Contractor will be expected to develop and implement a detailed Construction SEP (CSEP) in line with the Project SEP, for approval by the MoE/PIU. The Construction Contractor will also appoint a Community Liaison Officer (CLO) to manage stakeholder engagement activities.



- 1.5.3 The MoE/PIU will have overview and oversight of stakeholder engagement activities to ensure a coordinated approach to stakeholder and grievance mechanism. The PIU will also have a nominated CLO in place, to support the Construction Contractor.
- 1.5.4 Prior to operation, the NPTG should adapt the Project SEP into a plan for the O&M phase of the Project for implementation during operation.
- 1.5.5 This hierarchy is outlined in Figure 1-2.



*Figure 1-2 Stakeholder Engagement Plan Hierarchy*

## 2 Project Description

### 2.1 Project Context

- 2.1.1 The proposed 220kV OHTL route alignment will commence with a connection to a planned substation in Sainshand (to be constructed as part of the Choir – Sainshand OHTL project) and end with a connection to an existing 220/35/22kV substation operated by the NPTG, located within a licensed mine area at the Tsagaan Suvarga mine (see **Figure 2-1**). Sainshand city is the administrative capital of Dornogovi aimag and is located approximately 415km south-east of the capital, Ulaanbaatar. Tsagaan Suvarga is the location of a mine in the west of Dornogovi aimag (province), approximately 180km south-west of Sainshand city.
- 2.1.2 The Sainshand substation will be located approximately 4km north-west of city. From this substation the proposed transmission route runs in a clockwise arc from south to west crossing the Trans-Mongolian Railway, Asian Highway Network (AH) 3 and Sainshand-Zuunbayan roads and the railway line running south to Zuun-Bayan. This railway line, which continues west to Tavan Tolgoi mine, is crossed once more by the proposed route approximately two-thirds of the distance to Tsagaan Suvarga. The proposed route then runs in a predominantly south-western direction for the vast majority of its length, turning southwards approximately 15km north of Tsagaan Suvarga (see **Figure 2-2**).

### 2.2 Proposed Works

- 2.2.1 The proposed OHTL comprises a 204km 220kV double circuit overhead line. The circuit will have no tee off connections at any point, which will help to improve transmission between the two substations. As the OHTL route will require changes in direction and elevation, different tower types are required depending on whether the power line maintains a constant direction or a change in angle or elevation. The Project will require 690 towers, as summarised in **Table 2-1** and **Figure 2-1 and 2-2**. The towers range in height between 36m to 41.5m. The foundation specifications for the different towers are shown in **Figure 2-3**. There is a variation in distance between individual towers that accounts for differences in surface elevation along the route and the characteristics of the terrain (rocks, dry stream beds, hills, and valleys), ranging from 139m to 323m for the anchor span and 139m to 7,449m for the transition span.

Table 2-1 OHTL towers

Type (see Figure 2-1)	Foundation System (see Figure 2-2)	Quantity	Height
PS220-2/ПС220-2	4xΦ3-2, 4xAP-6	612	36m
PS220-2/ПС220-6	4xΦ3-2, 4xAP-6	31	41.5 m
U220-2/У220-2	4xΦ5-AM, 16xAP-6	31	31.6 m
U220-2+5/У220-2+5	4xΦ5-AM, 16xAP-6	7	36.2 m
U220-2+9/У220-2+9	4xΦ5-AM, 16xAP-6	8	40.6 m
U220-2+9/У220-2+9	4xΦ3-2, 4xAP-6	1	40.6 m

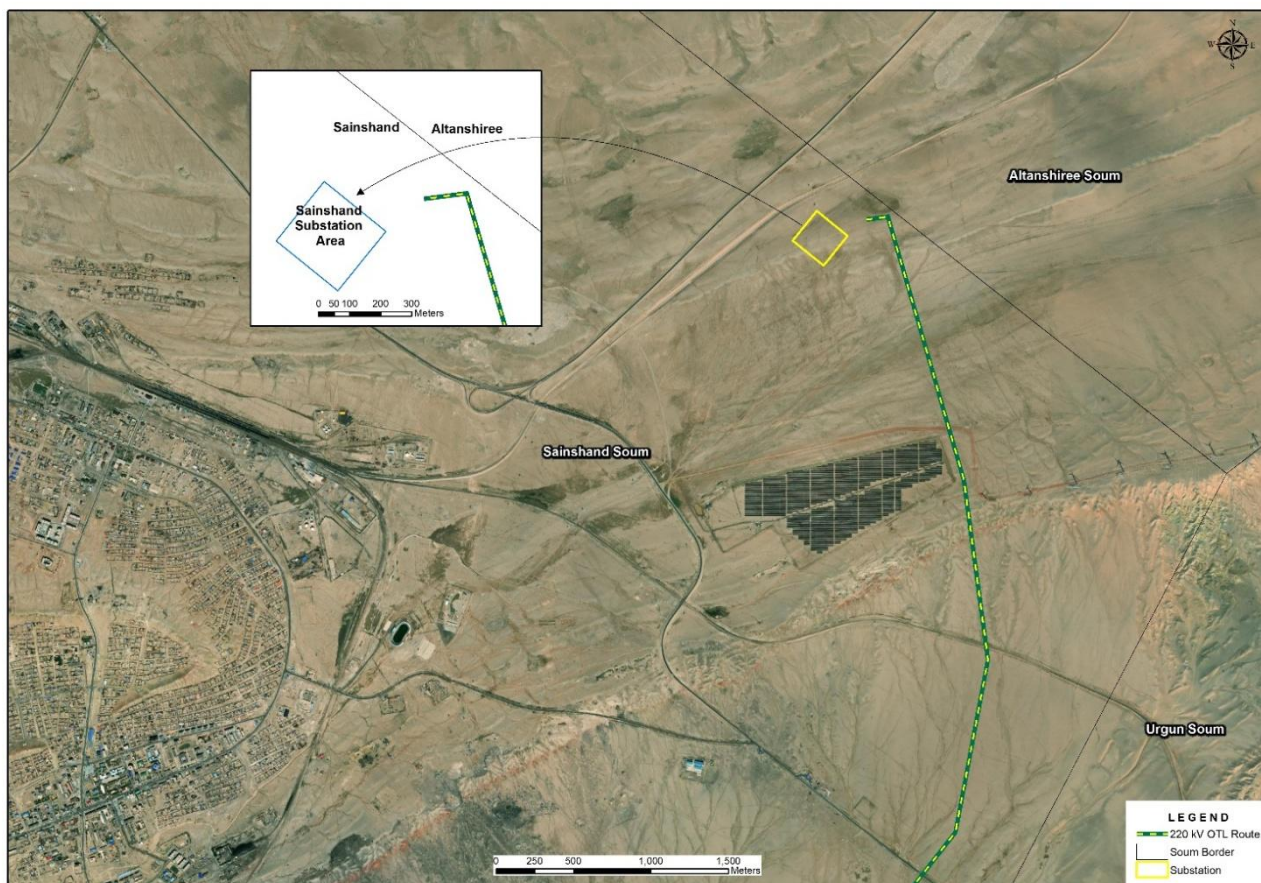
Хэлхээний тоо	Хоёр хэлхээт	Хоёр хэлхээт	Хоёр хэлхээт	Хоёр хэлхээт	Хоёр хэлхээт
Тулгуурын төрөл	Завсрын тулгуур	Завсрын тулгуур	Эргэлтийн ба таталтын анкер тулгуур	Эргэлтийн ба таталтын анкер тулгуур	Эргэлтийн ба таталтын анкер тулгуур
Мөсжилтийн район	III-IV	I-IV	I-IV	I-IV	I-IV
Дамжуулагчийн хэлбэр	АС-300/39, АС-400/51	АС-300/39, АС-400/51	АС-300/39, АС-400/51	АС-300/39, АС-400/51	АС-300/39, АС-400/51
Трассын хэлбэр	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0
Төрөл					
Тулгуурын маяг	ПС 220-2	ПС 220-6	У220-2	У220-2+5	У220-2+9
Тулгуурын жин, кг	Цинжгүй	8467	14398	17603	19486
	Цинжтэй	8798	14981	18290	20245

Figure 2-1 Tension Towers

*Figure 2-2 Tower Foundation Specifications*

OFFICIAL USE

- 2.2.2 The towers and lines for the transmission lines will be made from steel and aluminium; with materials sourced mainly from international companies due to availability of these structures.
- 2.2.3 The location of the planned Sainshand substation that will be constructed as part of the Choir-Sainshand OHTL Project is shown in **Figure 2-4**. This substation is due to be constructed before the (Sainshand-Tsagaan Suvarga) Project commences construction.



*Figure 2-4 Sainshand Substation Location*

- 2.2.4 The Project will connect to the existing Tsagaan Suvarga substation, which is located within the Tsagaan Suvarga mining license area and adjacent the mine itself, owned and operated by Mongolian Alt Corporation (MAK) (**Figure 2-5**). Whilst the substation is owned and operated by the NPTG, it is located on land owned by MAK. The Government of Mongolia is currently in negotiation with MAK to become a shareholder of the mine. As part of this negotiation, the land within the substation would be transferred to state ownership (i.e. NPTG) under a concession agreement.



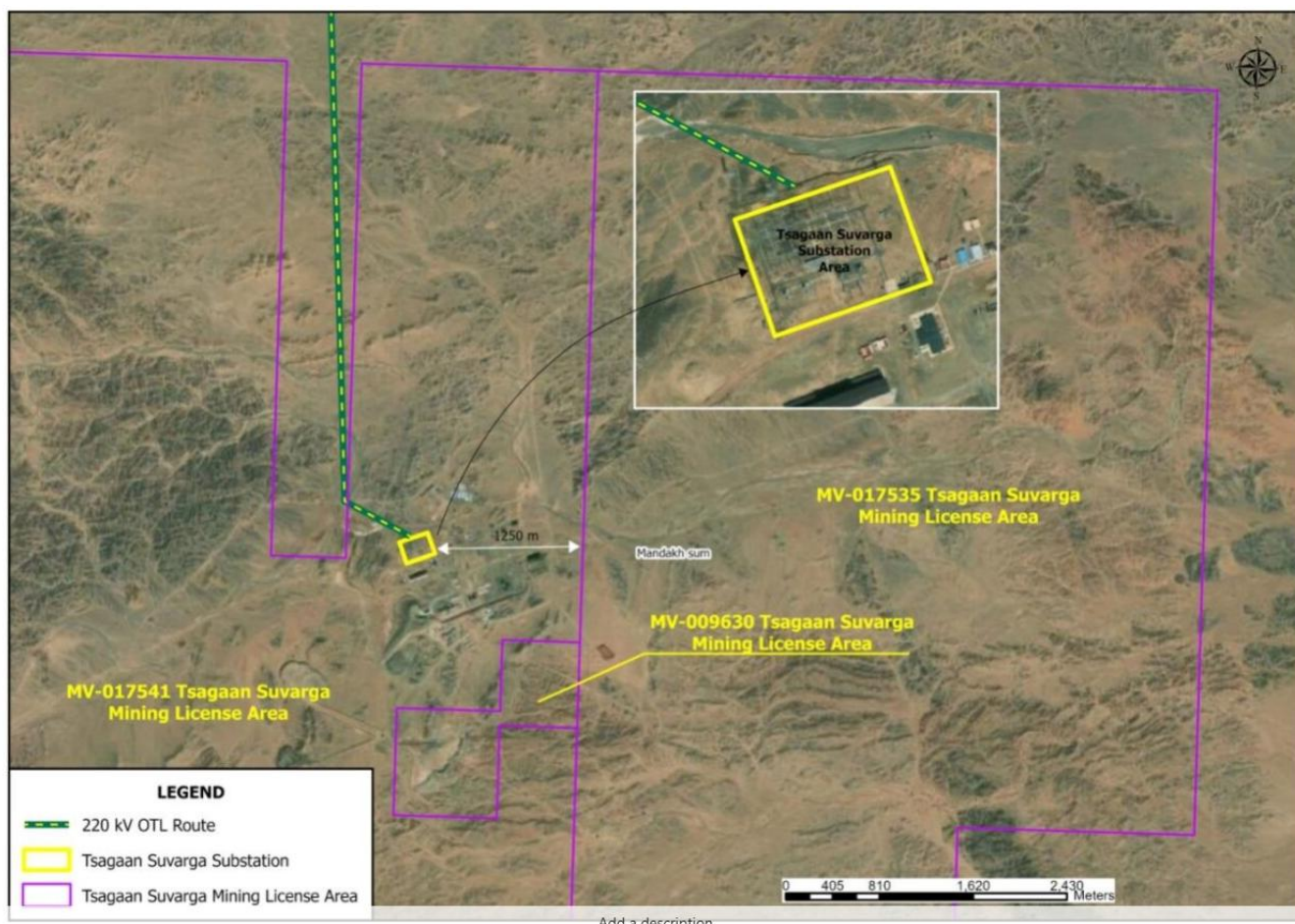


Figure 2-5 Tsagaan Suvarga Substation Location

## 2.3 Construction Phase

- 2.3.1 Construction is anticipated to take two years, anticipated to commence in 2027. The construction programme allows for pre- and post-construction activities such as mobilisation, enabling works, testing and commissioning. A detailed construction programme will be prepared by the appointed Construction Contractor.
- 2.3.2 At the time of writing, no information is available on whether the Construction Contractor will use camps and any details of other temporary sites such as works areas and haul/access roads. Contractors will therefore be required to select sites based on minimal environmental and social impacts, avoiding, or if this is not possible, minimising, involuntary resettlement. They will also be required to assess the final sites that are selected so that, where necessary, additional mitigation measures can be applied to reduce adverse impacts. The Construction Contractor will be required to:
- undertake environmental and social screening of any temporary sites that require additional land take (e.g., workers' accommodation camp, lay down areas, etc.), to the approval of MoE and

EBRD.

- ii. pre-construction surveys such as ecology surveys, as outlined in the Project Environmental and Social Management Plan (ESMP); and
- iii. develop a detailed set of management plans that form the Construction ESMP.

## Establishment of the Right of Way

- 2.3.3 The Mongolia Law on Energy 2001, as amended, states that Governors should take measures to evacuate buildings and facilities constructed within the protection strip of linear energy infrastructure, including measures to remove households, trees, shrubs and they should also take measures to protect the safety zone [referred to as the Right of Way (RoW) within this document]. Article 33 of the Law covers the boundaries of network safety zones and states that lines and networks should have established boundaries of their safety zones. The Mongolian Government Resolution No. 97 of 18 March 2020 also stipulates the establishment of protection zones or RoW for transmission lines, in line with Article 33 of the Law on Energy.
- 2.3.4 The Resolution sets out specific RoWs as provided in **Table 2-2**. The requirements for 220kV lines are highlighted in yellow. Any activities that may interrupt energy transmission are prohibited within the RoW. This includes prohibition of infrastructure development within the RoW and any activities in the RoW area will require approval from the powerline owner. No trees and any agricultural plantation are allowed within 25m 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 2-2 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
220 kV	25m	6m	25m	4m

## Land Acquisition

- 2.3.5 To secure the land required for the OHTL, including its RoW, the design team that identified the route for the MoE, MasterPoint LLC, have obtained an approval page with signatures from the following organisations: NPTG, Dornogovi Aimag, Mongolian Railways, National Emergency Management Agency, National Dispatching Center, Baganuur-South East Region Power Transmission, Land Relation, Urban Development Agency and the Dornogovi Branch of the Information & Communication Network.
- 2.3.6 In line with the requirements of Resolution No. 97 of 18 March 2020 (as discussed above), the NPTG will need to obtain a Decree from the relevant Governors at the aimag and soum level for the official



permanent transfer of the land to the Project i.e. to the permanent ownership of the MoE. As per EBRD requirements, any land required that affects local herder camps or assets should also be subject to engagement with those households; further details are provided in this report.

2.3.7 **Figure 2-6** shows the land uses along the Project route. As of 2025, the following mining licences are applicable:

- Three exploration licences crossed by the route – Ungut to the south of Sainshand (crossing Sainshand and Saikhandulaan soums), Tsagaan tsaviin khudag to the immediate north of the Tsagaan Suvarga mine (in Mankdakh soum) and Dovtsog Khudag in Mankdakh soum.
- One mining licence, Tsagaan Suvarga mine and Tu'men O'izii uul | Tsagaan Suvarga to the immediate north of Tsagaan Suvarga – owned by MAK.

2.3.8 According to the Mineral and Petroleum Authority (Key Informant Interview (KII) held 8 July 2025), the NPTG as the developer will be required to negotiate with license holders to obtain a “no objection” for the OHTL route. It is understood that to date, the NPTG has not entered into negotiations with the companies with the exploration licences crossed by the Project; however, they have liaised with MAK (Tsagaan Suvarga mine and Tu'men O'izii uul | Tsagaan Suvarga mines).

2.3.9 According to data provided by the Land Agency in the Project soums, there are several areas that have been identified as land allocated for development, as follows:

- A land parcel allocated to an industrial and technological park.
- A land parcel allocated to commercial and public service facilities, centres, and complexes.

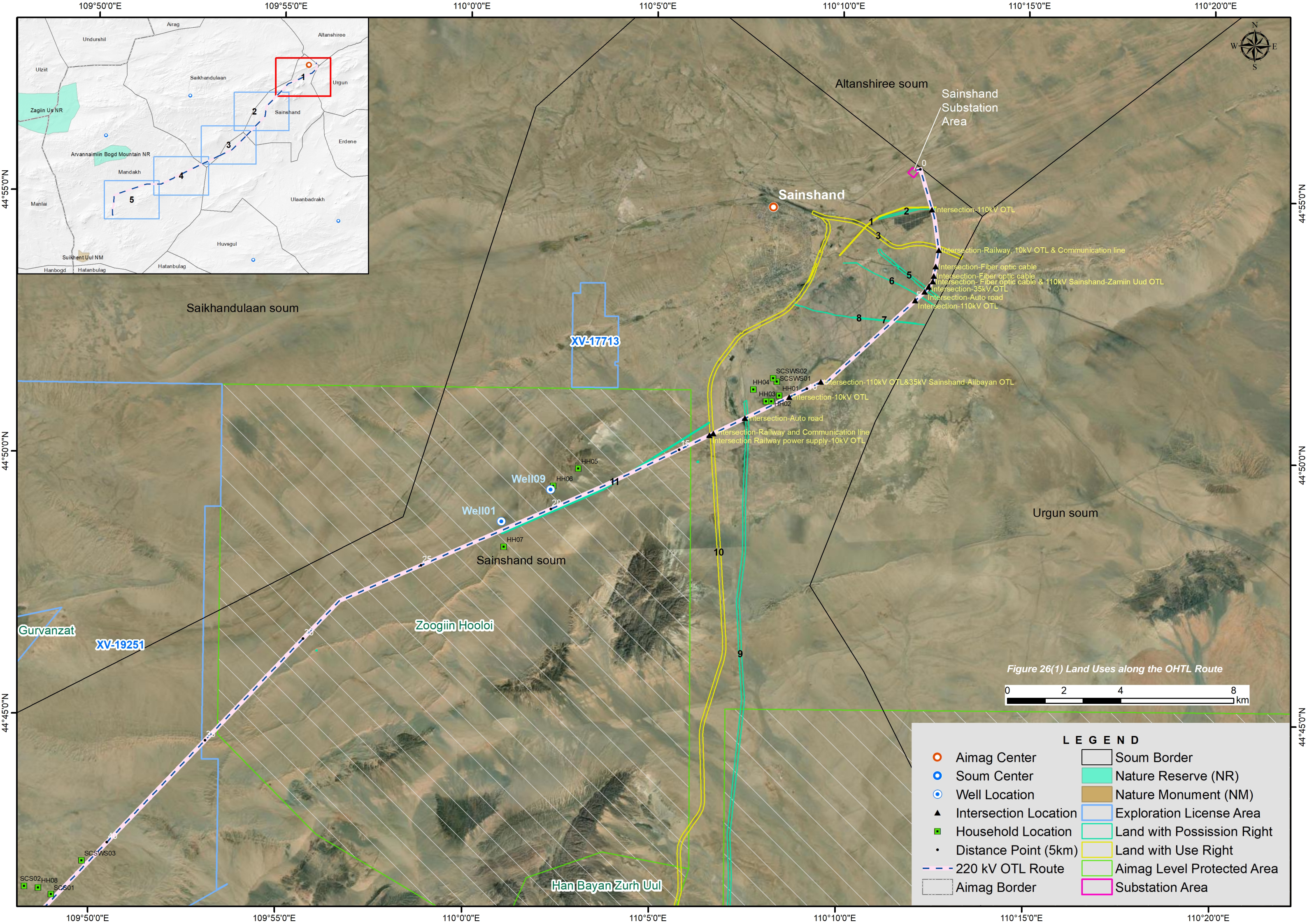
2.3.10 Neither of these sites have been developed. In addition to the above, there are three locally protected areas (LPAs) crossed by the OHTL and one priority conservation area:

- Zoogiin Hooloi
- Uushiin Govi
- Ganzaga Uuliin Urgutgul
- Priority Conservation Area

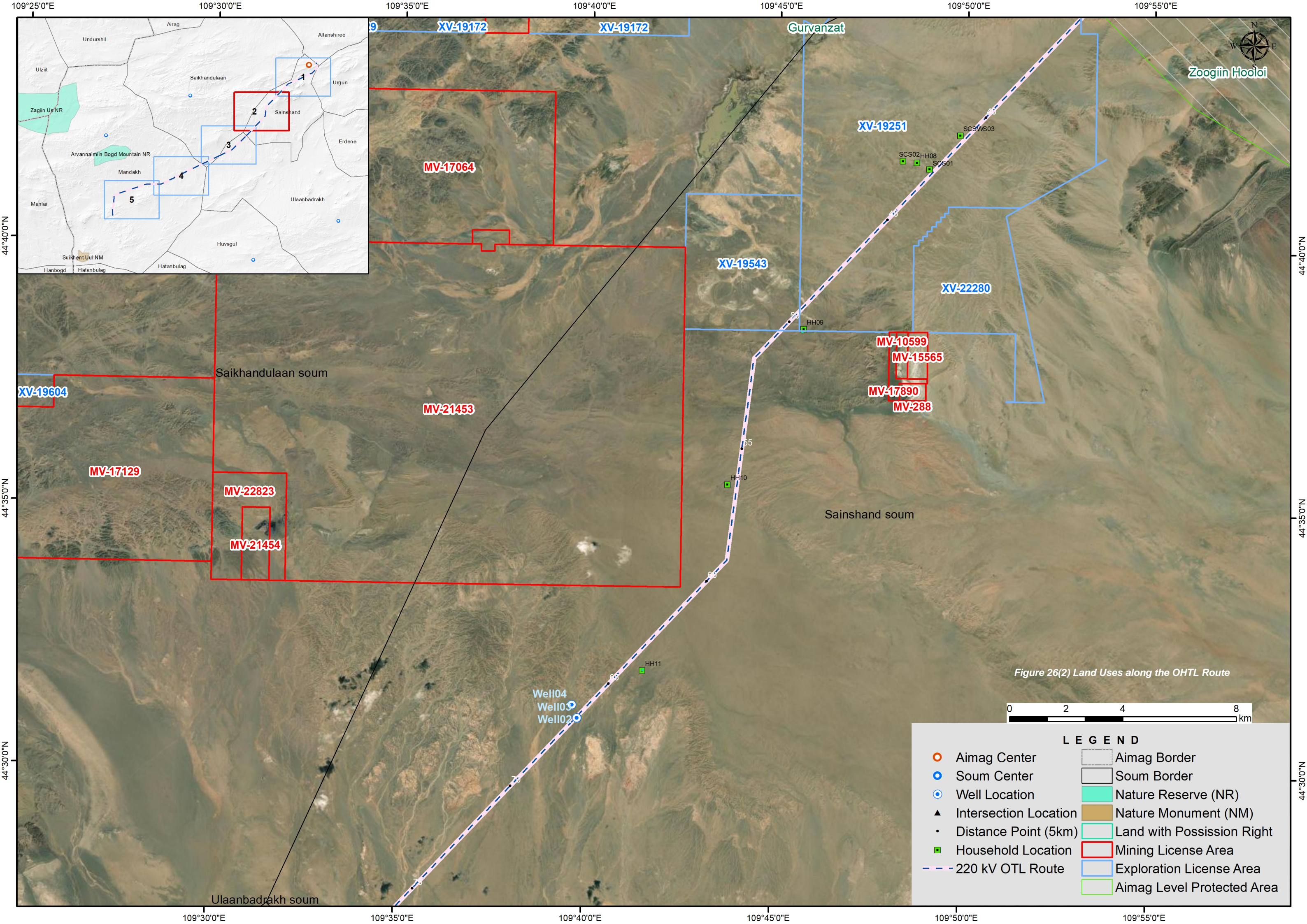
2.3.11 There are no residential structures or other structures within the OHTL route or its RoW, though there are water wells and herder households (and associated *gers*) within a 25m-1km buffer zone either side of the OHTL centreline (2km buffer zone in total).

2.3.12 Within the substation sites and 25m around both the existing and proposed substations' connections, there are no buildings or structures (other than the existing substation structures at Tsagaan Suvarga).

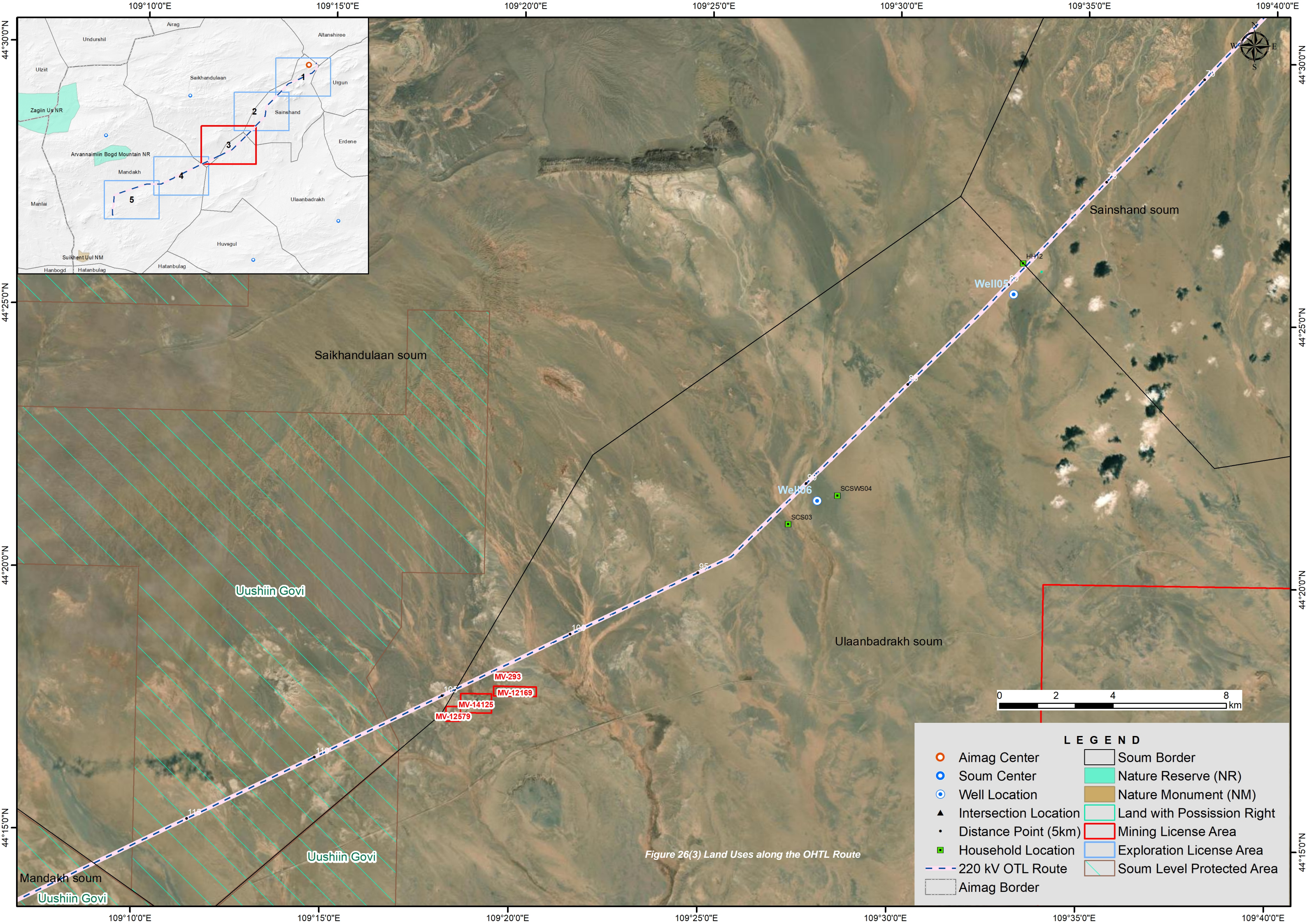




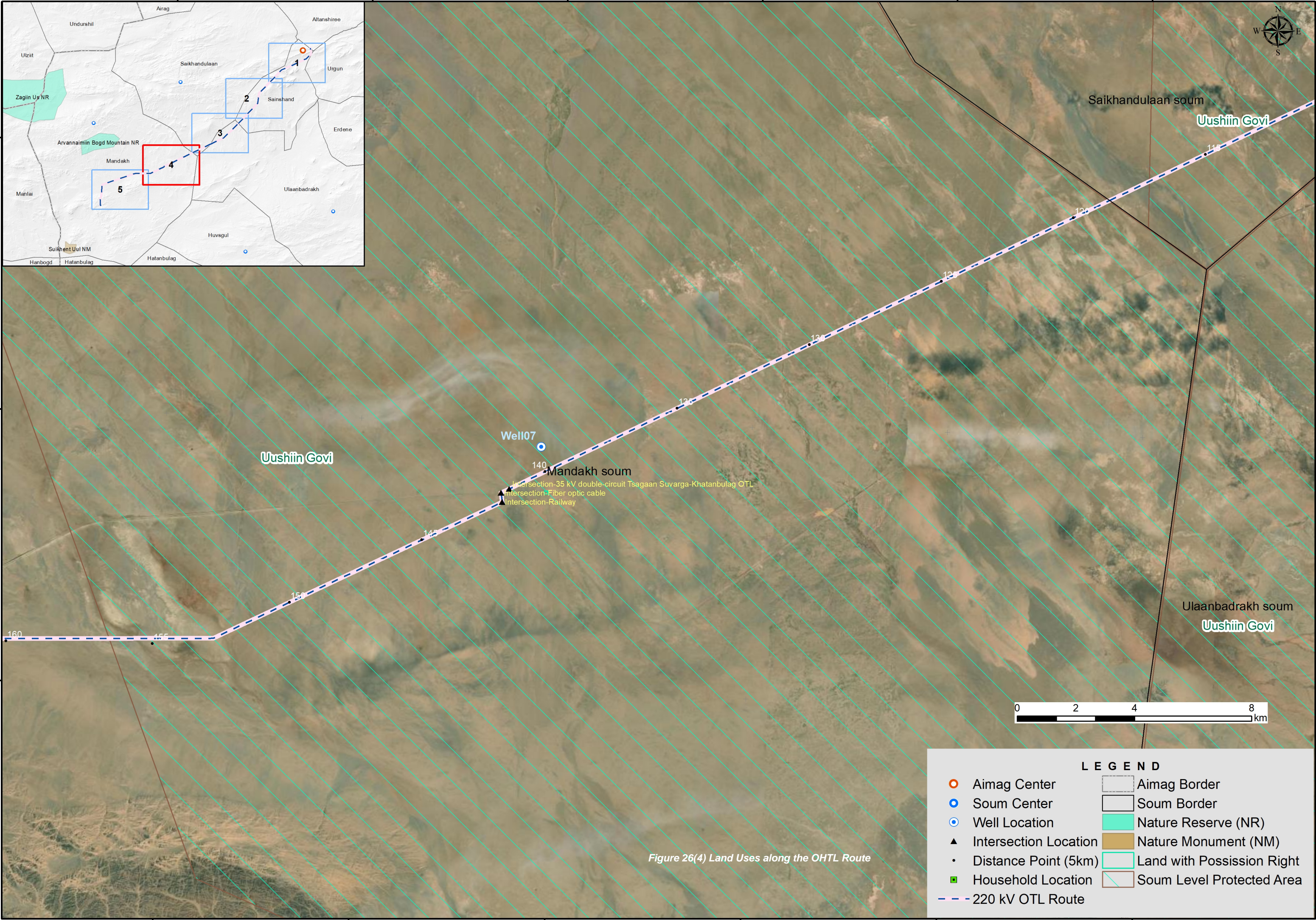




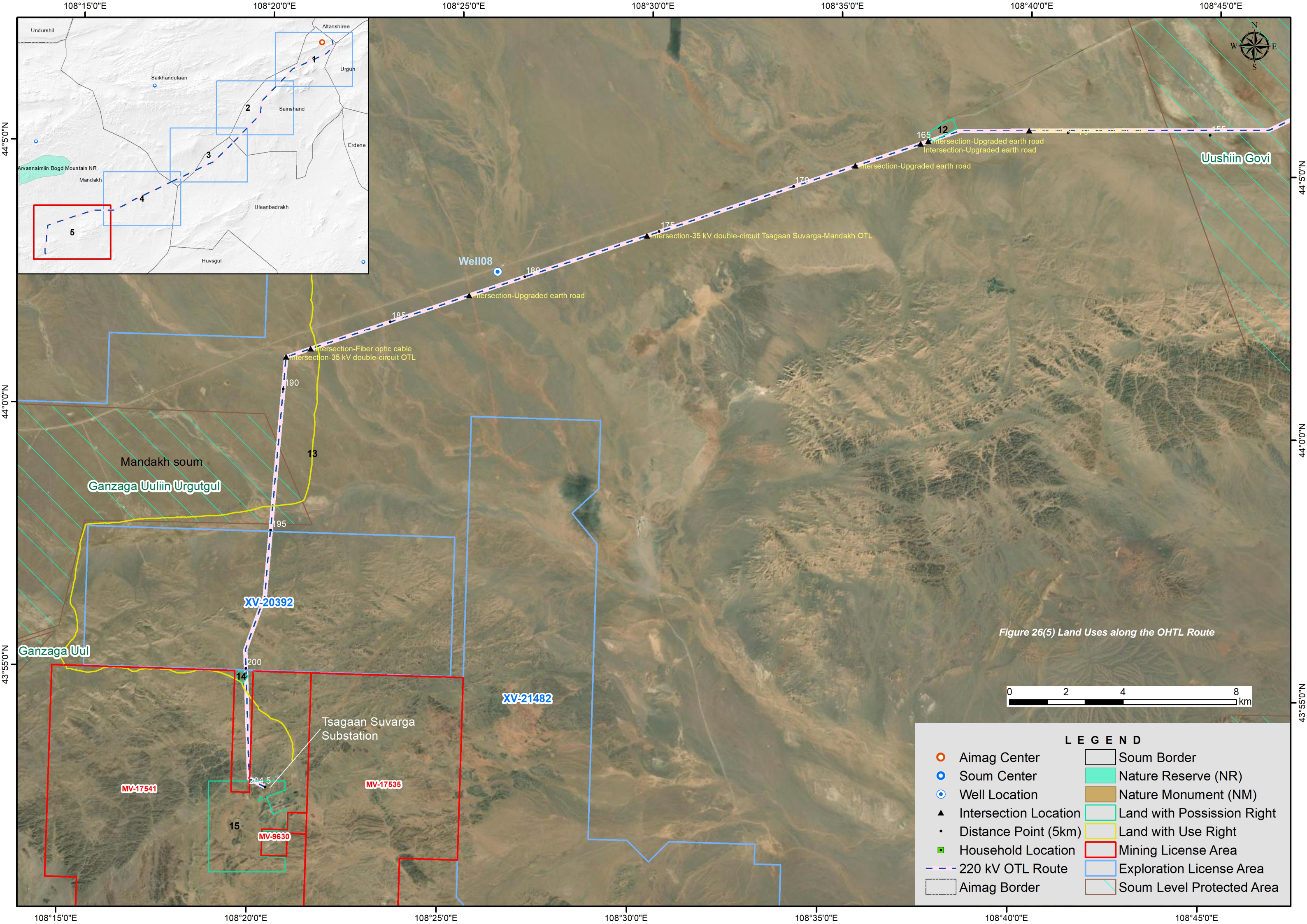














## Design Optimisation

- 2.3.13 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 towers. 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.
- 2.3.14 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 Acquisition and Resettlement Framework (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.

## Key Construction Activities

- 2.3.15 Details of the workforce and equipment required during the construction phase will be determined by the Construction Contractors once appointed. However, typical site installation and preparatory work for road projects includes the following:
- Development of the lay down areas, work compounds and construction camps including power generation where required.
  - Mobilisation of supplies and materials necessary for construction (vehicles, trucks, construction equipment).
  - Temporary signage and the setting up of deviations where necessary.
  - Levelling of excavation of pole and tower foundations.
  - Erections of towers and poles.
  - Stringing of lines.
  - Civil works and installation of substation.
  - Waste management; and
  - Testing and first operation of equipment.
- 2.3.16 The types of equipment that will be required includes:
- Excavators
  - Bulldozers
  - Dump trucks for transporting excavation soil, construction materials and equipment
  - Cranes
  - Forklifts
  - Concrete mixers
  - Trucks
  - Scaffolding
  - Compactors
  - Mechanical saws
  - Light tools





- Painting equipment

2.3.17 Earthworks will be required for the levelling and excavation of tower and pole foundations. The proposed tower base areas will be levelled; where possible, cut soil will be used for levelling the site to design levels. It is estimated that around 24,890 cubic metres of material will be excavated for these foundations.

2.3.18 During construction, raw materials will be required such as limited quantities of sand and aggregates.

### Associated Facilities

2.3.19 Associated facilities are defined in the EBRD ESP as “facilities or activities that are not financed by EBRD as part of the project but which in the view of EBRD are significant in determining the success of the project or in producing agreed project outcomes. These are new facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist.”

2.3.20 The use of prefabricated concrete foundations eliminates the need for quarrying. The Tsagaan Suvarga substation already exists and the Sainshand substation is anticipated to have been constructed by the time this Project is under construction. Therefore, at most, limited quantities of sand and aggregates may be required for tower construction and substation bases and will be sourced from local suppliers as needed. Therefore, it is considered there is unlikely to be a requirement for borrow pits or quarries. However, this, together with their location, would be determined by the Construction Contractor. The Construction Contractor is required to select sites based on minimal environmental and social impacts and in accordance with relevant permits.

2.3.21 During construction, access to all tower locations will be necessary to perform the civil works, structure erection and stringing of conductors and shield wires. Access will be determined by the Construction Contractor. Where feasible, the Construction Contractor will be obliged to use existing roads. Where there are no official roads, during the pre-construction phase the Construction Contractor will be required to identify the route to/from and along the route and ensure that this is demarcated to ensure safety of livestock/herders or other land users and to reduce environmental damage of using multiple different dirt tracks to the site. During O&M, it would be anticipated that existing roads and paths will be used wherever possible. Once access to the route has been obtained, vehicles should be restricted to driving along the RoW to avoid multiple tracking to/from the OHTL. The use of existing roads is mandatory wherever possible.

2.3.22 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, the PIU has proposed that a main camp and workers' accommodation would be located near to Sainshand substation, with smaller camps being used along the OHTL route during the period in which nearby work is completed. As an indicative number, one secondary camp per 100km of route is a standard procedure, therefore around two or three camps are anticipated.



## 2.4 Operation Phase

### Design Life

- 2.4.1 The operational life of a tower is typically around 80 years. The conductors, insulators and fittings on high-voltage overhead lines normally last for about 40 years.

### Operation and Maintenance

- 2.4.2 The main activities to be carried out during the operation of the Project will include 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. The towers and overhead lines need to be refurbished periodically in order to maintain the network and ensure it continues supplying electricity safely and securely.

## 2.5 National Environmental Impact Assessment

- 2.5.1 As well as the ESIA Disclosure Package prepared to meet EBRD requirements, a national Environmental Impact Assessment (EIA), including a General Environmental Impact Assessment (GEIA) and Detailed Environmental Impact Assessment (DEIA) will be required for the Project. The required documents for request of General Environmental Impact Assessment have been prepared and submitted to the Ministry of Environment and Climate Change (MECC) for review and approval. Once approved, the DEIA will be prepared, and public consultation will be undertaken. Further details on this consultation are provided in **section 6**. Based on the outcomes of the consultation, the DEIA will be revised and then submitted to the MECC for final approval.

## 3 Stakeholder Engagement and Information Disclosure Requirements

### 3.1 National Requirements

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

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

3.1.2 This Law stipulates that public involvement in the national Detailed Environmental Impact Assessment (DEIA) process is required. It is certain that a DEIA will be required for this project. Article 18.4 requires that the opinion of the local population is addressed in undertaking and preparing the DEIA.

3.1.3 According to the Law, Chapter 4 Article 18 paragraph 1-5:

- The state central administrative organization in charge of nature and environment shall make public disclosure 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 approved by the Minister of Nature and Environment.

#### **Regional Development Management Law (2003, as amended 2006)**

3.1.4 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'*.

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

- 3.1.5 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.
- 3.1.6 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.
- 3.1.7 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 *khurals* in the affected *soums* and obtain the *khural* members' views about the project.

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

- 3.1.8 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.
- 3.1.9 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 khural* 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 the Ministry in charge of environmental 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.

## Resolution on Resolution of Petitions and Complaints from Citizens to State Authorities and Public Officials (17 April 1995)

3.1.10 In April 1995, the “Law on resolution of petitions and complaints from citizens to state authorities and public officials” came into effect which partly addresses grievance mechanisms. The Law stipulates that governmental bodies are to respond to inquiries and complaints from citizens and must do so within 30 calendar days<sup>1</sup>. If necessary, this period shall be extended for up to 30 days by an executive officer of a particular organization. A petitioner or a complainant shall be informed of the extension of this period.

## Law on Environmental Protection (1995, as amended 2012)

3.1.11 The law seeks to guarantee the human right to living in a healthy and safe environment, through the protection of the environment for the present and future generations. Article 5 and 10 of the law are relevant to public consultation:

- There shall be public access to activities and decisions in respect of environmental protection and the use of natural resources; and
- Environmental monitoring will provide the public and interested business entities and organisations with information on the environment and natural resources.

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<sup>1</sup> Parliament of Mongolia. 1995. Law on resolution of petitions and complaints from citizens to state authorities and public officials. Unofficial translation. Available at: <https://legalinfo.mn/mn/detail?lawId=294>

## 3.2 EBRD Requirements

3.2.1 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 (2019);
- Access to Information Policy (2019);
- PR10 Information Disclosure and Stakeholder Engagement (2019); and
- Relevant European Union (EU) Directives.

3.2.2 These are summarised below.

### **EBRD Environmental and Social Policy (ESP) (2019)**

3.2.3 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. Meaningful consultation should be undertaken, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest. Stakeholder engagement should provide stakeholders with access to timely, relevant, understandable and accessible information in a meaningful, effective and culturally appropriate manner.

### **EBRD Access to Information Directive and Policy (2019)**

3.2.4 The Access to Information Directive and Policy set out the EBRD's commitment to transparency and disclosure based on the principles of Transparency, Accountability, Good Governance and Client Responsibility to Affected Stakeholders, describes the principles of implementation arrangements as well as contains a limited list of exceptions to disclosure and corresponding overrides. The scope of the policy includes the following:

- The EBRD endeavours to identify, raise awareness and engage with a broad range of stakeholders including affected people and communities, civil society groups and members of the public, taking into account the diverse nature and significance of specific interests, including the interests of those who may face barriers in access to information.
- The EBRD works closely with clients to provide sufficient information about the environmental and social risks and impacts arising from Projects and to engage with stakeholders in a meaningful, effective, inclusive and culturally appropriate manner consistent with the ESP.

### **EBRD Performance Requirement 10 (2019)**

3.2.5 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. 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. **Table 3-1** summarises the requirements of PR10 on information disclosure and stakeholder engagement.

*Table 3-1 EBRD PR 10 Requirements*

Objective	Key Requirement
Stakeholder identification	<ul style="list-style-type: none"> <li>Identify and document stakeholders, including disadvantaged or vulnerable groups who are affected by or may have an interest in the Project; or may have an interest in the Project.</li> <li>Develop and implement a Stakeholder Engagement Plan and Grievance Mechanism.</li> </ul>
Information disclosure	<ul style="list-style-type: none"> <li>Provide 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.</li> <li>Disclose relevant project information, as appropriate, to inform stakeholders about the risks, impacts and opportunities of the project. Information to include: <ul style="list-style-type: none"> <li>the purpose, nature, scale and duration of the project</li> <li>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</li> <li>the envisaged stakeholder engagement</li> <li>the time and venue of any envisaged public consultation meetings</li> <li>the grievance mechanism</li> </ul> </li> <li>Disclose information in local language(s).</li> </ul>
Meaningful consultation	<p>Based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest, consultation will:</p> <ul style="list-style-type: none"> <li>begin early in the project planning process and continue throughout the project life cycle</li> <li>consider and respond to feedback</li> <li>be based on the prior disclosure and dissemination of information</li> <li>be undertaken in a culturally appropriate format, in relevant local language(s)</li> <li>be free from external manipulation, interference, coercion, discrimination, intimidation and retaliation</li> <li>enable meaningful participation</li> <li>be documented</li> </ul>
Ongoing Engagement and External Reporting	<ul style="list-style-type: none"> <li>Provide regular reports on environmental and social performance to stakeholder, which will be disclosed at least annually.</li> <li>Provide information on adverse environmental and social risks and impacts to identified stakeholders, on an ongoing basis.</li> <li>Seek feedback from affected parties on the effectiveness of the impact mitigation measures.</li> </ul>



Objective	Key Requirement
Grievance Mechanism	<ul style="list-style-type: none"> <li>Establish an effective grievance mechanism as early as possible in the project development process. The Grievance Mechanism should: <ul style="list-style-type: none"> <li>address concerns promptly and effectively, in a transparent manner that is culturally appropriate, free from manipulation, interference, coercion, intimidation and retribution</li> <li>allow for anonymous complaints to be raised and addressed</li> <li>not prevent access to judicial or administrative remedies</li> </ul> </li> <li>Monitor implementation of the grievance mechanism and analyse trends.</li> </ul>

## EBRD Independent Project Accountability Mechanism

- 3.2.6 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 process, 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 Directive and Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

## 3.3 Relevant European Union Directives

### 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)

- 3.3.1 The EIA Directive and its amendments emphasise the need for effective public participation in decision-making, as well as the participation of associations, organisations especially non-governmental organisations (NGOs). 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.
- 3.3.2 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.

## Aarhus Convention

- 3.3.3 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.
- 3.3.4 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”*.
- 3.3.5 Mongolian is not currently a signatory to this Convention; however the Government has stated an interest in acceding to the Convention through communication with the United Nations Economic Commission for Europe (UNECE). In principle, Mongolian law broadly aligns with the requirements of the Convention.

## 3.4 Gaps between National and EBRD Requirements

- 3.4.1 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 address a detailed identification of stakeholders or detailed, meaningful and empowered consultation. There is also no explicit requirement for a grievance mechanism.
- 3.4.2 This SEP sets out a process for future consultation and managing grievances to comply with the more stringent EBRD standards, including its stakeholder engagement requirements specifically. This SEP will be publicly disclosed for comments on the EBRD website and locally. It will also be developed in more detail for the construction and operation phases of the Project.

## 4 Stakeholder Identification

### 4.1 Approach to Stakeholder Identification

- 4.1.1 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. Following the requirements with EBRD PR10, project stakeholders have been identified that take into account individuals or groups who:
- (i) are affected or likely to be affected (directly or indirectly) by the Project (affected parties); or
  - (ii) may have an interest in and / or influence over the Project (other interested parties).
- 4.1.2 Project stakeholders have been identified using criteria (i) and (ii) above, based on the OHTL location, initially considering the administrative units associated with the Project, namely, Sainshand, Ulaanbadrakh, Saikhandulaan and Mandakh soums, in Dornogovi aimag.
- 4.1.3 Stakeholder identification has also considered those groups or individuals identified because of their potential to impact or be impacted by the Project, based on:
- The Project's activities and area of influence (AoI);
  - Potential positive and negative Project impacts;
  - Contact by and with Project relevant government bodies and civil society and business groups; and
  - Contact made by and with organisations expressing, or likely to have, an interest in the Project.

### 4.2 Vulnerable Groups

- 4.2.1 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.
- 4.2.2 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."*

4.2.3 Vulnerable groups or individuals in the study area have been defined as:

- The elderly
- People with disabilities
- Orphans
- Single headed households
- Households with four and more children under 18

4.2.4 Herders as a group are not considered vulnerable in the context of the Project, however individual herder households may be considered vulnerable if they meet the above criteria. The household surveys identified that of 10 households interviewed, two households have vulnerable persons; one household has an elderly person and a person with a disability (PWD) (adult). No women-headed households were among surveyed 10 households.

## 4.3 Stakeholder Identification and Analysis

4.3.1 Key stakeholders are presented in **Table 4-1**. These categories are not exclusive. One individual or group can belong to several categories. 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.

*Table 4-1 Identified Stakeholders, Impacts, Interests and Influence*

Stakeholder category	Stakeholder sub-category	Impact / Interest / Influence
<b>Directly Affected Parties</b>		
Landowners, title holders or land users affected by land requirements	Herder camps within the OHTL ROW.	<b>Impact</b> Loss of land or access to land, temporary or permanent – currently, no herder household camps are within the RoW.
	Mining concessions within the Project area of influence.	<b>Impact</b> Project will require access to land held within two exploration licence areas and one mining licence area (Tsagaan Suvarga mine) for the RoW, during construction, and for emergency repairs and general maintenance during operation.  The mining business may be economically displaced (temporarily or permanently) by the Project.
	Livestock herders.	<b>Impact</b> May experience temporary loss of access to pastureland. May experience dust and nuisance impacts from the Project.

Stakeholder category	Stakeholder sub-category	Impact / Interest / Influence
		Risk of pedestrian/livestock and vehicle accidents during construction.
Asset owners affected by land requirements	Herder households with structures (gers, buildings, wells) within the ROW.	<b>Impact</b> Asset owners whose assets are temporarily or permanently affected as a result of the Project within the ROW. Currently, no assets are within the ROW or construction working area and therefore no relocation is considered necessary.
	Utility and service operators: - Railway owner crossed by the Project. - Other OHTL owners (NPTG) crossed by the Project.	<b>Impact</b> There may be some temporary or permanent impacts related to the need for the Project to cross other utilities and infrastructure.
Project Proponent and Core Operations	Employees	<b>Interest</b> Interested in providing goods and services to the Project. <b>Impact</b>
	Contractors, Suppliers, and Service Providers	Employment, economic impacts, including on incomes, occupational and health, safety and security, procurement and supply chain requirements.
Utilities	Water Electricity	<b>Impact:</b> Demand for water, electricity during construction. <b>Influence:</b> Permits for works/supplies.
<b>Indirectly Affected Parties</b>		
Herder households	Herder camps in a 2km buffer zone of the OHTL (i.e. 1km either side of the centre line).	Gers close to or near the OHTL ROW may be impacted through restrictions to access. Access to other assets and pasture land may be restricted during construction. May experience potential impacts related to environmental quality (disturbances and dust caused by the Project's traffic and construction works). Influx of construction workers.
Local communities	Soum / bagh residents. Tsagaan Suvarga mine workers.	<b>Impact</b> May experience potential impacts related to environmental quality, disturbance to cultural practice and heritage (tangible and intangible), community health, safety and security during construction and operation.  Influx of construction workers.

Stakeholder category	Stakeholder sub-category	Impact / Interest / Influence
Local businesses	Local business owners within the Project area of influence	<b>Impact</b> Project may provide opportunities for increased revenue from construction and operation workforce. Provision of improved electricity supply.
Vulnerable groups	Vulnerable individuals and groups	<b>Impact</b> May be disproportionately affected by the Project, for example may experience adverse health impacts more acutely than other stakeholders.
National Government	Government of Mongolia	<b>Interest</b> Regional economic development, infrastructure development, permitting and monitoring, protection of employees and public safety. <b>Influence</b> Potential to influence Project approvals and timeframes.
	Ministries and Departments / Regulators	<b>Interest</b> Main source of information for local governments about the project. <b>Influence</b> Power to regulate or influence the Project in terms of establishing policy, granting permits or other approvals or guidance for the Project, and monitoring and enforcing compliance with national Law throughout the project lifecycle.
Aimag Level Government and self-governing body (Dornogovi)	Governor	<b>Interest</b> Regional economic development, taxes, infrastructure development. Specific concerns of the electorate. Personal political agendas. <b>Influence</b> Potential to influence Project in terms of the granting permits or other approvals, monitoring and enforcing compliance with national Law through Project life cycle.
	<i>Khural</i> Speaker	
	<i>Khural</i> Members	<b>Interest</b> Regional economic development, infrastructure development, permitting and monitoring, protection of employee and public safety.
	<i>Aimag</i> Administration Departments (Planning, Environment, Inspection, Land)	

Stakeholder category	Stakeholder sub-category	Impact / Interest / Influence
		<b>Influence</b> Potential to influence Project approvals and timeframes.
Soum and Bagh-Level Government and self-governing body	Soum Governor, Khural Speaker and elected Khural Members, soum administration Bagh Governor	<b>Interest</b> Local economic development, infrastructure development, permitting and monitoring, protection of employee and public safety. <b>Influence</b> Potential to influence Project approvals and timeframes.
Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs)	Regional and National NGOs and CBOs	<b>Interest</b> NGOs with environmental and social concerns <b>Influence</b> Lobbying and advocacy
Project beneficiary	MoE NPTG	<b>Influence:</b> Responsible for the identification and Project implementation, including contractor management.
Financial Institutions	EBRD	<b>Influence:</b> Interest and influence in minimising risk to their investment by ensuring the Project's ongoing compliance with environmental and social performance requirements, tied to financial disbursements.
Local services	Health centre Police Fire	<b>Interest:</b> Interests include safety - high occurrence of traffic accidents. Availability of health facilities for the construction and operation phases.
Media	Social media channels (LinkedIn, Facebook and Twitter)	<b>Interest</b> Platform for stakeholders to express their interest in the Project, including in relation to impacts. These media are also tools that can be used by the Project to interact with stakeholders on various topics. <b>Influence</b> Potential to influence public opinion based on content.
Industrial Sector Bodies	Construction and infrastructure trade bodies Trade Unions	<b>Impact:</b> Potential impacts on their operations (including: cumulative). <b>Interest:</b>



Stakeholder category	Stakeholder sub-category	Impact / Interest / Influence
		Business opportunities.



## 5 Stakeholder Engagement

5.1.1 As part of the ESIA for the Project, the following stakeholder engagement activities have been undertaken:

- ESIA Scoping Engagement (May-June 2025)
- ESIA Baseline / Impact Engagement (23-28 June 2025, field work in Dornogovi aimag; Kils in Ulaanbaatar, 7-8 July 2025)

5.1.2 On-going engagement and ESIA Disclosure will be undertaken as the Project progresses and are described in **Section 6**.

### 5.2 ESIA Scoping Engagement

5.2.1 Engagement during scoping has been limited to meetings with the PIU engineer, an expert of design company, focusing on initial project introductions and clarifications questions and information requests and the NPTG.

*Table 5-1 Meetings undertaken during scoping*

Date	Activity	Attendees	Purpose
04 April 2025	Kick-off meeting with the Ministry of Energy	Rachael Bailey, Arcadis Enhtulga Tumurbaatar, EcoTrend Tserenkhand Gurbadam, EcoTrend Amra Erdenebaatar, EBRD Vadim Sinitsa, EBRD Munkhtur - Senior specialist, Strategic Planning Division, Ministry of Energy Munkhbadral - Specialist responsible for smart grid and information technology, Ministry of Energy	To discuss the Project, introduce the ESIA Team and request support in the provision of data.
12 May 2025	In Person meeting with Ministry of Energy and National Power Transmission Grid (NPTG)	Rachael Bailey, Arcadis Richard Anderton, Arcadis Enhtulga Tumurbaatar, EcoTrend Anhbayar Ochirbat, EcoTrend	To introduce the Project team in-person prior to the site reconnaissance visit. To request data on the Project and its alternatives.

Date	Activity	Attendees	Purpose
		Tserenkhand Gurbadam, EcoTrend Nomin Erdene, EcoTrend Enkhtsetseg Byambaa, EcoTrend Interpreter Munkhtur - Senior specialist, Strategic Planning Division, Ministry of Energy Battseren, Ministry of Energy Shirmenbaatar Tsevegjav, Choir-Sainshand OHTL PIU Bataarchuluun Purewdagva, Choir-Sainshand OHTL PIU Dulguun Erdenebileg, Choir- Sainshand OHTL PIU	
16 May 2025	Meeting with Ministry of Energy and National Power Transmission Grid (NPTG) and Project Designers	Rachael Bailey, Arcadis Richard Anderton, Arcadis Enkhtulga Tumurbaatar, EcoTrend Tserenkhand Gurbadam, EcoTrend Nomin-Erdene, EcoTrend Shirmenbaatar Tsevegjav, Choir-Sainshand OHTL PIU Bataarchuluun Purewdagva, Choir-Sainshand OHTL PIU	Follow up meeting after the site reconnaissance visit.

## 5.3 ESIA Baseline / Impact Engagement

5.3.1 During the ESIA preparation, the following stakeholder engagement activities were completed from 22-28 June 2025 alongside the social baseline fieldwork (these are described in turn below) and 7-8 July 2025 in Ulaanbaatar city.

- Focus group discussions (FGDs)
- Key Informant Interviews (KIIs)
- Household surveys

5.3.2 The purpose of this engagement 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 preparation 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 these measures;
- Collect stakeholder opinion and preferences on future engagement methods; and
- Visit herder households in a 1 km study area surrounding the alignment and conduct a Household survey about sources of livelihood, income generation, and other social issues of a select number of households within this study area.

5.3.3 A *Social Baseline Field Work Plan* was prepared to obtain baseline data and undertake consultations, which is provided in **Appendix A**.

5.3.4 Prior to the meetings, a series of courtesy calls with government stakeholders was undertaken to facilitate 'community entry' for the ESIA team (**Table 5-22**).

Table 5-2 Courtesy calls

Stakeholder group	Sainshand soum, Dornogovi aimag	Ulaanbadrakh, Dornogovi aimag	Saikhandulaan, Dornogovi aimag	Mandakh soum, Dornogovi aimag
Self-governing body at Aimag/Soum level	-	-	-	Citizens Representatives Hural (Speaker and Presidium members)
Aimag/Soum level government	Governor	Governor	Governor	Deputy Governor
Bagh level government	Bagh Governor (baghs #1, 5, and 6)	Bagh Governor (Argalant)		-

## Key Informant Interviews

5.3.5 The KIIs undertaken is provided in **Appendix B** and summarised in **Table 5-3**. The KII interview questions used are provided in **Appendix C**. The responses to the KIIs are provided in **Appendix D**.

Table 5-3 Key Informant Interviews, soums in the Project Aol

Name	Stakeholder Group	Position Title	Date
<b>Sainshand Soum, Dornogovi Aimag</b>			
Batjargal.O	Aimag level government	Dornogovi Aimag Governor	23, June 2025
Munkh-Erdene.Ts	Aimag level administration	Head of Dornogovi Aimag Development Policy, Planning and Investment Department	23, June 2025
Munkhbat. M	Aimag level administration	Lead of Social Policy Division	23, June 2025
Naranbold.J	Aimag level agency	Head of the Food and Agriculture Department	23, June 2025
Nasan-Ulzii.N	Aimag level agency	Dornogovi aimag Health Department, Head of Administration and Information Division	23, June 2025
Purev.E	NGO	Head of the Dornogovi Tourism Association	23, June 2025
Khulan.B	Aimag level agency	Dornogovi aimag Police senior information and research specialist, Police major	23, June 2025
Munkhbayar	Bagh level government	Dalaishand (1 <sup>st</sup> bagh) Governor	23, June 2025
Uranchimeg	Bagh level government	Khairkhan (6 <sup>th</sup> bagh) Governor	23, June 2025
Badamlyankhua	Bagh level government	Zuunbayan (5 <sup>th</sup> bagh) Governor	24, June 2025
<b>Saikhandulaan Soum, Dornogovi Aimag</b>			
Enkh-Amgalan.B	Soum level government	Soum governor	27, June 2025
Lkhamsuren	Soum level administration	Budget and Treasury specialist	05, July 2025
Ulzijjargal.U	Soum level agency	Hospital director	27, June 2025
Tuguldur	Soum level agency	Police	27, June 2025
Ariuntungalag. B	Soum level administration	Social affairs specialist	27, June 2025
Ulziidavaa.J	Soum level administration	Specialist for agriculture and pasture issues	27, June 2025
<b>Mandakh Soum, Dornogovi Aimag</b>			
Bat-Erdene.B	Soum level government	Deputy Governor	26, June 2025

Name	Stakeholder Group	Position Title	Date
Batkhuu	Soum level self-governing body	Chairperson of the Citizen's Khural	26, June 2025
Suvdantsetseg	Bagh level government	Tukhum (5th bagh) Governor	26, June 2025
Zolbayar	Soum level administration	Agricultural specialist	26, June 2025
Agiimaa. O	Soum level administration	Budget and Treasury specialist	26, June 2025
Chuluuntsetseg.E	Soum level agency	Hospital director	26, June 2025
Narantuya	Soum level administration	Social policy specialist	26, June 2025
<b>Ulaanbadrakh Soum, Dornogovi Aimag</b>			
Erkhembold.Ts	Soum level government	Soum governor	25, June 2025
Gandolgor.Sh	Soum level administration	Social policy specialist	25, June 2025
Altanchimeg	Soum level administration	Agriculture specialist	25, June 2025
Enkhtsetseg	Soum level administration	Budget and treasury specialist	25, June 2025
Narmandakh	Soum level agency	Head of health center	25, June 2025
Enkhsaikhan	Soum level agency	Police	25, June 2025
Oyuntungalag	Bagh level government	Argalant bagh Governor	25, June 2025
<b>Ulaanbaatar</b>			
Sanjmaa	Mining	Mongoliin Alt Corporation – senior specialist for legal compliance, Department of Environment and Sustainable Development	07 July 2025
Unurnasan	Government	Ministry of Industry and Mineral Resources – senior specialist, Geology and Mining Policy Division, Ministry of Industry and Mineral Resources	08, July 2025

Name	Stakeholder Group	Position Title	Date
Khatanzorig	SOE	Mongolian railway, state-owned Joint Stock Company – <i>Head of the Department for Signaling, Communications, and Power issues</i>	08 July 2025
Chuluunbaatar	SOE JV	NPTG, Director of Central Branch	08 July
Gan-Ochir.S	Government agency	Mineral Resources and Petroleum Authority, <i>Director</i>	08 July

5.3.6 Meetings were also held virtually with:

- Mongoliin Alt Corporation (MAK), a mining company (7 July 2025)
- The Ministry of Industry and Mineral Resources (8 July 2025)
- The Mineral Resources and Petroleum Authority (8 July 2025)
- The Mongolian Railway State-Owned Joint Stock Company (8 July 2025)
- The NPTG (8 July 2025).

## Focus Group Discussions

5.3.7 Four FGDs were held with women, elderly people, small business owners, and other stakeholders. The approach to the FGDs and the questions used are presented in **Appendix E**. The number of attendees is shown in **Table 5-4**. Attendee lists and notes from the FGDs are provided in **Appendix F**.

Table 5-4 FGD in Project soums

Location	Stakeholders	Number of participants	Date
Sainshand soum	Women, elderly, PWD; Social worker, bagh leader, Soum public servants	8	23 June
Ulaanbadrakh soum	Women, soum resident, elderly, bagh governor, soum public servants	7	25 June
Mandakh soum	Small business owner, elderly, bagh governor, private sector employee	6	27 June
Saikhandulaan soum	Women, soum residents, deputy governor, elderly, NGO, schoolteacher.	7	27 June



## Household surveys

- 5.3.8 A total of 23 potential households or assets within a 1km buffer either side of the OHTL route were originally identified using Google Earth. These households/assets were verified through liaison with the relevant soums and field work, with a visit made in the field to 15 households, three wells and two abandoned camps. In total, it was possible to interview 10 households identified as having winter/autumn camps within 1km of the centreline of the OHTL route. Of these, six households had a possession certificate for a winter camp, one household had an ownership certificate, and the remainder are using the camp without any land use agreement.
- 5.3.9 The household survey questionnaire covered a diverse range of topics, including information about land use, distance between summer and winter camps, income and expenditure, living conditions, livestock and other assets, cultural heritage. The questionnaire also contained questions about household composition, livelihood sources, and by views on potential impacts of the Project on their household and the wider community.
- 5.3.10 Of the households interviewed, nine were from Sainshand soum and one from Saikhandulaan soum. 50% of all respondents were male, and 90% were above 26 years of age. All participants were herders, with three of them pensioners.
- 5.3.11 Details of the household survey questionnaire and the survey findings are provided in **Appendix F and G of the ESIA Report**.

## 5.4 Engagement with Other Stakeholders

- 5.4.1 The Project team engaged with the MoE and NPTG using various approaches as summarised in the table below.

*Table 5-5 Engagement with relevant stakeholders at national level*

No	Name	Position title	Date	Method
1	Sanjmaa	Senior Specialist for Legal Compliance, Department of Environment and Sustainable Development, Mongoliin Alt Corporation	7 July	In person meeting
2	Unurnasan	Senior Specialist Geology and Mining Policy Division, Ministry of Industry and Mineral Resources	8 July	In person meeting
3	S. Gan-Ochir	Director, Exploration and Exploitation Department, Mineral Resources and Petroleum Authority	8 July	In person meeting
4	Khatanzorig	Head of the Department for Signaling, Communications, and Power Issues, Mongolian Railway State-Owned Joint Stock Company	8 July	In person meeting
5	Chuluunbaatar	Director of CES, NPTG	8 July	In person meeting

## 5.5 Summary of Results

5.5.1 **Table 5-6** provides a summary of the views and opinions expressed by stakeholders via KIIs and FGDs as outlined above.

*Table 5-6 Summary of Stakeholder Concerns and Opinions*

Topic	Comments
Information and cooperation with local government	<ul style="list-style-type: none"> <li>Most people interviewed mentioned that they have not received formal information yet about Project.</li> <li>It is advisable to share information about project with the main stakeholders such as the Railway and particularly with soum administration for collaboration and agreement.</li> <li>KIIs highlighted importance of information dissemination through Bagh citizen's meeting which are held on quarterly basis.</li> <li>Soum/bagh governors would like to have proper and detailed information in advance and then to present it to the citizens and herder together with Project implementing body.</li> <li>With information herders would not be against the Project.</li> </ul>
Construction and Infrastructure	<ul style="list-style-type: none"> <li>Most of the locals see Energy as an Infrastructure. There is hope for improvement as electricity supply is weak in soums.</li> <li>No major negative impacts expressed by locals. However, locals see construction should follow standards and regulations.</li> <li>It is necessary to reflect on the maintenance and repair of the operation.</li> </ul>
Land use and access to land/pastureland	<ul style="list-style-type: none"> <li>Grazing areas along roads may be destroyed during construction.</li> <li>Concerns exist over pasture degradation</li> <li>There are cases that livestock and herders with motorcycle fall into Holl/outages. It is important to ensure the protection of livestock and citizens.</li> </ul>
Environmental issues	<ul style="list-style-type: none"> <li>Dust and noise.</li> <li>Death of birds.</li> <li>Waste during construction work.</li> <li>Make it clear whether the impact measures include environmental protection costs and measures.</li> </ul>
Cultural Heritage and Palaeontology	<ul style="list-style-type: none"> <li>If the project follows existing infrastructure routes, it is unlikely to encounter cultural or paleontological sites.</li> <li>The power line crosses a special protection zone. This needs to be coordinated with the aimag.</li> </ul>
Community health and education	<ul style="list-style-type: none"> <li>School, health service delivery quality will increase by preventing from unexpected power cut and having quality of electricity. Better power supply would reduce operational cost for medical services; allocate budget more effectively; no need to purchase backup generators.</li> <li>However, incoming workers always increase soum hospital workload and pressure. Workers should have health insurance and basic preventive health screenings. To avoid increasing the workload on existing soum doctors, there is a better for an on-site physician who can provide primary care and basic treatment services depending on number of workers.</li> <li>Labor safety standards must be observed and implemented consistently.</li> </ul>

Topic	Comments
Community security	<ul style="list-style-type: none"> <li>• Security of herders might be affected during construction. For example, livestock theft and personnel stealing from winter and spring camp.</li> <li>• Unknown workers will be coming into community to work. Individuals with prior convictions should provide documentation.</li> <li>• It's advisable to share information about staff working with the police for collaboration.</li> </ul>
Benefits	<ul style="list-style-type: none"> <li>• Electricity is infrastructure, it is basic need.</li> <li>• Quality of life will improve with energy supply.</li> <li>• Local business diversity.</li> <li>• School and health service delivery quality will increase;</li> </ul>

5.5.2 Table 5-77 sets out household survey feedback on the Project.

*Table 5-7 Interviewed Households' Perceptions on Potential Project Impacts*

Positive impacts	Negative impacts
Economic development at bagh, soum and aimag level will increase	Land degradation and will increase that is likely to affect livestock health as well as human health
Possibility to develop SMEs and increase business diversity	Habitat degradation
Social infrastructure may facilities creation and Infrastructure development will improve	Loss of natural landscape, pollution, increased dust, soil erosion
Sufficient energy possibility for local people	Accidents during construction or ecological imbalance.

## 6 Stakeholder Engagement Programme

### 6.1 Potential Environmental and Social Effects

6.1.1 Beneficial environmental and social effects may be inclusive of but not limited to:

- Employment and skills training in construction;
- Periodic employment during operation;
- Demand for goods and services resulting in improved local and regional economy;
- Improvements to power grid capacity and reliability; and
- Support development projects through reliable power supply.

6.1.2 Adverse environmental and social effects may be inclusive of but not limited to:

- Construction phase:
  - General community health and safety risks from construction;
  - Access restrictions;
  - Disturbance and direct loss of habitat as a result of construction activities;
  - Soil loss and deterioration as a result of construction activities;
  - Increased noise and vibration levels as a result of construction activities;
  - Increased dust levels as a result of construction activities;
  - Excavated and general construction wastes;
  - Community nuisance and disturbance (including impact on women's safety) resulting from construction workers moving in and out of the Project area; and
  - Potential temporary impacts on livelihoods as a result of land requirements.
- Operational phase:
  - Small volumes of wastes during construction from O&M activities;
  - Impacts to landscape character and visual amenity;
  - Potential increased risk to people and livestock from EMFs, electrocutions and fires;
  - Potential risk for bird and bat collisions with the OHTL;
  - Potential substation operational noise; and
  - Safety risks arising from higher speed vehicles using the road than currently.

6.1.3 Therefore, this SEP is developed to address community concerns with regard to key environmental and social effects through the implementation of the stakeholder consultation and information disclosure activities as outlined below.

## 6.2 Stakeholder Consultation and Information Disclosure

### Goals and Objectives

6.2.1 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, 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.

6.2.2 The Stakeholder Engagement Programme set out below therefore 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;
- Ensure planned and transparent engagement where necessary, with appropriate notification, clear disclosure of objectives and an agreed process of interaction, recording and follow-up;
- Build on communication programmes and mechanisms already in place and take into account local sensitivities that have been identified to date on 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.

### Information Disclosure Activities

6.2.3 As part of the current ESIA work to meet EBRD requirements, a Project ESIA Disclosure Package will be disclosed. The Project ESIA Disclosure Package consists of documents developed to meet the requirements of EBRD ESP 2019, as follows:

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

6.2.4 The purpose of the disclosure will be to ensure that stakeholders and affected parties have the opportunity to comment on and input further into the assessment of 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.

- 6.2.5 The ESA Disclosure Package will be available both in English and in Mongolian via the EBRD website ([www.ebrd.com](http://www.ebrd.com)) and the MoE website. As this is a Category A project, documents will be available for a minimum consultation period of 120 days.
- 6.2.6 Hard copies of these documents will also be available at EBRD offices and MoE offices in Ulaanbaatar, Mongolia. 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 interested parties.
- 6.2.7 The MoE will also publicly notify how both hard and soft copies of the Project ESIA documentation can be accessed and comments provided, including electronically (via online feedback forms and/or a Project-specific email address) and in comment books.
- 6.2.8 Public consultation will be undertaken to inform the local communities of the ESIA Disclosure Package; the intention is to align this with the DEIA public consultation – further details are provided in section 6.2.10 below.
- 6.2.9 Within one month of the 120 day disclosure period, a Public Consultation Summary Report (PCR) will be prepared. Where necessary, an updated ESIA Report and associated documents will also be prepared and issued on the EBRD website; and an updated NTS provided at the aimag and soum level. The PCR will be disclosed on EBRD and MoE's website and will be available in paper form at local soum offices. The local community will be made aware of the disclosure via local soum and bagh officials.
- 6.2.10 As part of the DEIA for the Project, public consultation must be undertaken to cover the 11 Project baghs, as well all the baghs within Sainshand soum and Mandakh soums. To avoid stakeholder fatigue, the intention is to align the EBRD ESIA Disclosure and DEIA public consultation events. As such, 11 public consultation events will be held at each bagh centre along the OTHL route, at:
- Dalaishand bagh
  - Chandmani bagh
  - Yalalt bagh
  - Ganzam bagh
  - Zuunbayan bagh
  - Khairkhan bagh
  - Naran bagh
  - Argalant bagh
  - Ulaanshoroot bagh
  - Servenbayankhoshuu bagh
  - Alagteeg bagh
- 6.2.11 Citizens' Representative Meetings will be held in Sainshand and Mandakh soums, in accordance with





DEIA public consultation requirements.

- 6.2.12 In addition, an event will be held in Sainshand city to cover the remaining baghs within the Project soums that are not crossed by the route, however, are required to be engaged under national legislation.
- 6.2.13 Specific outreach will also take place with the herder households along the proposed route; and engagement will be undertaken with representatives of infrastructure along the route (railway lines, exploration and mining license holders and holders of land possession rights).
- 6.2.14 During the construction phase, the MoE, PIU and the Construction Contractors will disclose relevant information about the Project. The NPTG will be required to continue disclosure in an ongoing manner as the Project evolves during the O&M phase. Further details are set out in section 8 for the construction and operation stages.

## Methods of Communication

- 6.2.15 Building upon the engagement methods utilised to date, and feedback gathered through previous consultation activities, different consultation approaches and methods will be employed moving forward for effective stakeholder engagement and information disclosure, as outlined in **Table 6-1**.
- 6.2.16 It is noted that other businesses and operators in the Project Area use a range of practices to engage with stakeholders, such as mine open days, CLO visits to herder households, attendance at bagh meetings and reporting to the aimag level. For this Project, as is standard practice in Mongolia, any stakeholder engagement should be coordinated with the aimag and soum/bagh governors.

*Table 6-1 Methods of Communication*

Method	Description
Public Meetings	Public meetings typically involve a range of activities such as slideshow presentations, poster displays, a question-and-answer period or roundtable discussions and dissemination of printed materials. Questionnaires may also be provided to attendees. The intention of public meetings is to facilitate opportunities for dialogue and a meaningful two-way exchange of information with local communities and interested parties.
Bagh meetings	Using existing fora for updates on the Project at the village level
Focus Group Discussions (FGD)	Small group meetings or FGDs will continue to be used in future engagement for specific groups e.g., women, vulnerable groups.
Information boards	Information boards will provide the public access to leaflets and information materials. They will allow the public to obtain information the Project, as well as to lodge complaints or concerns. These may be established in each affected soum (at community centres / Government offices).
Key Informant Interviews (KII)	KIIs will continue to be conducted to obtain detailed understanding / information from people with first-hand/specialised knowledge of particular issues, or interest in an issue. KIIs resemble

Method	Description
	a conversation among acquaintances and also provide the opportunity to verify data collected in FGDs.
Targeted meetings	Will be used with individual project affected persons and any displaced persons to discuss individual issues.
Formal Correspondence	Formal written correspondence will continue to be used for communications with Mongolian authorities and other stakeholders.
Awareness Materials	Road construction/operation awareness materials in appropriate and targeted formats will be used to create awareness and inform communities of project activities and plans (including safety). These types of materials include posters and/or brochures.
Grievance Mechanism	A Grievance Mechanism will be developed to foster the effective resolution of grievances and community concerns. The Grievance Mechanism is central component of the Project's stakeholder engagement toolkit for the life cycle of the project.
Local Media, Radio, and Newspaper Articles	The Project may use media such as TV, radio, Facebook and newspaper to disseminate information and create awareness.
Construction site signage	Construction site signage of key Project information (safety awareness, dates, etc.).

#### 6.2.17 General principles to be followed include:

- Effective and inclusive engagement with project stakeholders;
- All affected people and vulnerable groups within the Project Area will be consulted regularly throughout the project lifetime, using targeted meetings and outreach as necessary;
- Advance warning will be provided to local communities regarding construction activities and schedule; including aimag level activities and timings; and
- FGDs will be conducted with vulnerable people to ensure that their needs and concerns are addressed in relation to Project impacts.

### MoE, PIU and NPTG Meetings

6.2.18 The MoE, with support from a PIU, will be responsible for the implementation, financial management and overall delivery of the Project as well as the implementation of measures and requirements specified within the Project documentation during the pre-construction and construction phases. NPTG will gain responsibility for these tasks during the O&M phase. The MoE, PIU and NPTG will undertake monthly meetings during their respective phases to, when applicable:

- Review overall Project activities (concerning both technical, environment, health and safety and financial Project delivery);
- Integrate the provision of services of day-to-day activities at different stages, from preparation to implementation and evaluation including procurement;

- Review management of the Construction Contractor and any consultants;
- Escalate unresolved issues;
- Discuss common issues related to the Project and overcome any obstacles;
- Discuss employment opportunities; and
- Ensure the appropriate implementation of training / information exchange.

### **Regulatory/Technical Meetings**

6.2.19 During the construction phase, communications will be made authorities and ministries to discuss regulations, permitting and Project relations.

### **Community Meetings and Engagement**

6.2.20 The MoE/PIU together with the Construction Contractor will be responsible for conducting these meetings during the pre-construction and construction phase, with the NPTG responsible during O&M.

6.2.21 Advance warning will be provided to local communities and herder households within the vicinity of the works regarding construction activities and schedule; including work activities and timings. Community health and safety awareness raising will be undertaken by the Construction Contractor and overseen by the MoE/PIU. Engagement will focus on general messages as well as a focus on high-risk areas such as near Sainshand and Tsagaan Suvarga and high-risk groups (e.g. herders, for example, encouraging herders not to leave livestock unattended).

6.2.22 FGDs will be conducted with women, the disabled, elderly and other vulnerable people to ensure that their needs and concerns are addressed in relation to the Project impacts. As necessary, this will include engagement at the affected person's residence or other location they stipulate and will consider the need for additional support, such as transportation. Local government and communities will also be consulted on the location of any construction workers' accommodation camps.

6.2.23 Prior to the start of construction, an information dissemination exercise will take place in the Project Area. This exercise will comprise key members of the MoE/PIU/Construction Contractor and involve the presentation of the information contained within the disclosure package at appropriate community fora (Khural meetings, local Government meetings) in Ulaanbaatar, and the soums and bagh's located in the Project Area. It will also communicate the availability of the community grievance mechanism to the local community.

6.2.24 Local communities and herders/herder households will be informed in advance of any access restrictions and temporary alternatives to be used. Details of temporary crossings will be publicised locally and be maintained up to date.

6.2.25 Local communities will also be fully informed of the grievance mechanism and how they can use it.

6.2.26 All contractors/workforce employees and subcontractors will be issued with a Code of Conduct addressing expectations and punitive measures concerning their engagement with the local community, including expected discipline and behaviour (for example, covering inappropriate sexual fraternisation)

in project-affected communities.

- 6.2.27 The Construction Contractor, with support from the MoE/PIU, will update aimags and soums monthly; or at frequency agreed as appropriate for the stage of construction works with each aimag, and each soum and bagh.
- 6.2.28 Stakeholder engagement activities and grievances will be reported monthly and key issues feed back to the Project aimag, soums and baghs. A presentation on construction progress and grievances will be given to the soums twice a year and to the local community and baghs once a year.

### **Consultation with Physically and Economically Displaced Persons**

- 6.2.29 In accordance with the LARF, and subsequent Land Acquisition and Resettlement Plan (LARP) if required, meetings will be conducted with displaced persons related to land acquisition (temporary and permanent), compensation measures and livelihood restoration. The meetings will be undertaken through the MoE and Dornogovi aimag.

### **Stakeholder Engagement Plan**

- 6.2.30 The Stakeholder Engagement Plan comprises several phases which have been designed to correspond with the overall development phases of the Project:
- Pre-construction Phase;
  - Construction Phase; and
  - O&M Phase.
- 6.2.31 **Table 6-2** summarises the stakeholders to be engaged, the engagement methods, and the information to be disseminated, during the Project pre-construction, construction and O&M phases. The engagement programme will build on the existing system and structure of engagement with the participation of relevant local authorities.
- 6.2.32 The Plan 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 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.

#### **Pre-construction phase**

- 6.2.33 Prior to the start of construction, the Construction Contractor will be responsible for developing a detailed Construction SEP. This will include the following actions:
- 6.2.34 **Development of a detailed list of stakeholders** - the Stakeholder List in this SEP 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 MoE/PIU and 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.

6.2.35 **Development of detailed Stakeholder Engagement Programme** - the outline SEP provided in this SEP will need to be developed into a detailed engagement programme for the pre-construction and construction phase, with responsibilities attributed to the Construction Contractor and, as relevant, the MoE/PIU. The following will need to be taken into account in the development of the detailed SEP:

- 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 Section 8). Local communities will also be fully informed of the grievance mechanism and how they can use it.

6.2.36 In addition to the above, the MoE/PIU should develop an Internal Communication Plan to cover guidance on internal and external communications. The Plan should enable the effective communication between the MoE, 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.

### Construction phase

6.2.37 The Construction Contractor will be responsible for developing a detailed construction phase SEP, in alignment with the Project SEP. The construction 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* (bagh meetings, local Government meetings).
- 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 and high-risk groups i.e. school children, herders.
- Regular feedback to the local administrations and communities.

### Operation and maintenance phase

6.2.38 The SEP for the O&M phase will be prepared by the NPTG, building on the actions identified for construction, and will be developed prior to the commencement of operations aligning with existing approaches to stakeholder engagement and grievance mechanisms within NPTG.

Table 6-2 Stakeholder Engagement Programme

Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
<b>ESIA Disclosure</b>				
All stakeholders	EBRD website Hard copies in MoE, NPTG and EBRD offices in Ulaanbaatar NTS in local aimag/soum Citizen's Halls Local Media, Radio and Newspaper Articles Bagh meetings Public consultation Khural meetings	Disclosure of EBRD documents: ESIA, NTS, SEP, ESMP, LARF and ESAP.	EBRD / MoE	Upon completion of the ESIA Disclosure Package.
All stakeholders	Public consultation Khural/Bagh/soum meetings	Gain feedback on ESIA Disclosure documents.	EBRD ESIA Consultants	During disclosure of the ESIA.
All stakeholders	EBRD and MoE/NPTG websites Updated NTS provided at the bagh and soum levels	Disclosure of final, updated ESIA Disclosure documents.	EBRD / MoE / NPTG	Following the disclosure period.
<b>Pre-construction Phase</b>				
Contractors	Tender documents	Contract information / Calls for Tender timing	MoE / PIU	During planning stage
EBRD	Formal meetings / correspondence	Formal correspondence in relation to ESAP compliance	MoE / PIU	As required.

Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
Local communities and businesses	<p>Public meeting prior to the start of construction to include community health and safety awareness raising presentation</p> <p>FGDs for vulnerable and high-risk people to discuss community health and safety issues</p> <p>Awareness materials</p> <p>Information boards and road signs in local settlements</p> <p>Local Media, Radio and Newspaper Articles</p> <p>Grievance mechanism</p>	<p>General pre-construction planning and site preparation prior to construction, including location of any construction camps</p> <p>Overall schedule of site preparation and construction, including sub-activities, key stages and potential stages of stakeholder interest</p> <p>Information on safety measures, access and traffic management during construction</p> <p>Targeted safety measures for vulnerable and high-risk groups</p> <p>Collect opinions and concerns</p> <p>Disclosure Community grievance mechanism</p>	MoE / PIU / Construction Contractor	Prior to construction
Potentially Displaced Persons / land owners	<p>Targeted consultation and surveys to identify potentially displaced persons (see LARF) if applicable and, where necessary (depending on final design), agreement on compensation.</p>	<p>Economic and physical displacement procedures and compensation agreements</p> <p>Timing of works</p> <p>Community Grievance mechanism</p>	MoE / PIU	Prior to construction
Affected utilities / services	<p>KII with the affected parties such as the local railway crossed by the OHTL.</p>	<p>Economic and physical displacement procedures and compensation agreements</p> <p>Timing of works</p> <p>Community Grievance mechanism</p>	MoE / PIU	Prior to construction



Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
Khurals (CRK) (aimag and soum) Government Agencies	Attendance at formal Bagh meetings Targeted meetings, as requested Awareness materials	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	MoE / PIU / Construction Contractor	Prior to construction
Vulnerable groups	Targeted meetings and FGDs with identified vulnerable groups in each area prior to construction Provision of information materials Grievance mechanism	Specific consultation, including information on project components, in particular the use of a construction workforce, safety issues / management, and also potential employment opportunities, including skills required and training opportunities, traffic management.	MoE / PIU / Construction Contractor	Prior to construction
Livestock herders	Targeted meetings and FGDs with identified vulnerable herder households prior to construction Provision of information materials Grievance mechanism	Specific consultation, including information on project components, in particular the use of a construction workforce, safety issues / management, and also potential employment opportunities, including skills required and training opportunities, traffic management and access routes	MoE / PIU / Construction Contractor	Prior to construction
Affected people Vulnerable groups Businesses / suppliers	Notices on information boards, shops, local offices etc. in local settlements Publication via local Khurals (aimag and soum) Awareness materials	Upcoming construction phase employment opportunities, application processes Project construction information (dates/ schedule, safety notifications, activities)	Construction Contractor	Prior to construction

Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
Industrial sector bodies General public	Local media / newspapers / radio			
Traffic police	Targeted meetings Official Email/Written Letter	Road safety	Construction Contractor	Prior to construction
Health centres Police Fire brigade	Targeted meetings Official Email/Written Letter	Development of Emergency Preparedness and Response Plan – availability of local resources for emergencies	Construction Contractor	Prior to construction
Utilities	Targeted meetings as required Formal correspondence	Utilities planning Grievance mechanism	Construction Contractor	Prior to construction
NGOs and CSOs – national and local	Formal correspondence / meetings Awareness materials Grievance mechanism	Provision of project information and awareness materials Discussions on specific matters	Construction Contractor	Prior to construction
All stakeholders	Local media / newspapers Facebook Grievance mechanism	Key Project construction information (dates/schedule, safety notifications, activities)	Construction Contractor	Immediately prior to construction at any one site
<b>Construction Phase</b>				
All stakeholders	Contractor website Notices on information boards, shops, local offices in district / soum centres Awareness materials	Ongoing and upcoming employment opportunities, application processes	Construction Contractor	Ongoing as required

Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
	Local media / newspapers / radio / Facebook			
Local communities	Notices on information boards, in shops, local offices etc in local settlements Bagh meetings Awareness materials delivered to local businesses / residents through leaflets, newsletter Local media, radio, newspapers, Facebook Grievance mechanism	Inform on project implementation schedule / progress Construction activities Consult the local communities about their views / opinion on project implementation and impacts Ensure awareness / availability of grievance mechanism	Construction Contractor	Monthly / as required (due to updates in e.g. programme) Annually
Vulnerable groups	FGDs/KIIs Newsletters Grievance mechanism	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 Ensure awareness / availability of grievance mechanism and code of conduct	Construction Contractor	FGDs/KIIs – at least twice during construction works or at a frequency agreed with local soum / bagh or directly with relevant persons/ groups Other items - monthly / as required Bi-annual updates
Potentially Displaced Persons	One-to-one meetings	Inform on project implementation schedule / progress On-going engagement related to any issues of compensation measures and grievances	MoE / PIU	As required
Employees	Training e.g. Code of Conduct Information boards at construction camps	Code of Conduct Inform of Project policy / plans in relation to	Construction Contractor	Induction of employees, prior to work on site of individual

Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
	and work sites Meetings in any construction camps Awareness materials Labour grievance mechanism	stakeholder engagement and communities Inform on external grievance mechanism Inform on internal HR grievance mechanism Labour grievances		Regularly during construction
National Government Agencies	Formal correspondence / meetings Media, newspapers, radio, Facebook Awareness materials Grievance mechanism	Provision of project information and awareness materials Meetings on specific matters	MoE / PIU	Ad hoc / As required
Khurals (aimag and soum)  Aimag and soum level agencies	Notices on information boards, shops, local offices etc. in all local settlements  Awareness materials Local media / newspapers / radio / Facebook	Ongoing and upcoming employment opportunities, application processes  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)	Construction Contractor	Bi-annual; and as required
Press and media	Formal correspondence / meetings Local media, newspapers, radio, Facebook  Awareness materials Grievance mechanism	Provision of project information and awareness materials Meetings on specific matters	MoE / PIU / Construction Contractor	Ad hoc / As required

Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
NGOs Community groups	Formal correspondence / meetings Local media, newspapers, radio, Facebook Awareness materials Grievance mechanism	Provision of project information and awareness materials Meetings on specific matters	MoE / PIU / Construction Contractor	Ad hoc / As required
EBRD	Formal meetings / correspondence	Formal correspondence in relation to ESAP compliance	MoE / PIU	As agreed
Local schools	Leaflets Advertisements School visits	Disclose information to schools and communities on the risks associated with construction safety	Construction Contractor	Prior to operation
Health centres Police Fire brigade	Targeted meetings	Communicate Emergency Preparedness and Response Plan and availability of services locally	Construction Contractors	As agreed
<b>Operation and Maintenance Phase</b>				
Employees	Smaller group training sessions Online training (depending on skills set) Labour grievance mechanism	Code of Conduct Inform on internal HR grievance mechanism	NPTG	Regularly during operation

Stakeholders	Engagement Method	Information to be Disclosed / Activity	Responsible Party	Schedule of Implementation
All stakeholders	Advertisements within regional employment publications Information boards	Information on employment opportunities and skills required / sub-contracting opportunities during operation	NPTG	During operation, as required
All stakeholders	Local media / newspapers / radio	Disseminate information about emergency procedures, electrical safety	NPTG	End of construction / beginning of operation
EBRD	Formal meetings / correspondence	Formal correspondence in relation to ESAP compliance	NPTG	As required.
Health centres Police Fire brigade	Targeted meetings	Communicate Emergency Preparedness and Response Plan and availability of services locally	NPTG	Regular basis, as agreed with organisations
Potentially displaced persons	Formal correspondence / meetings Awareness materials Grievance mechanism	Discussions on specific matters / feedback on ongoing community issues.	NPTG	End of construction / beginning of operation

## 7 Grievance Mechanism

### 7.1 Introduction

- 7.1.1 A formal community *Grievance Mechanism* will be implemented to ensure that relevant parties (MoE/PIU/NPTG/Construction 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.
- 7.1.2 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 labour grievance procedure for Project employees/workers will be provided.

### 7.2 Ministry of Energy Grievances

- 7.2.1 The MoE does not have its own Grievance Policy, however, all government organizations have to comply with the Law on resolution of petitions and complaints from citizens to state authorities and public officials. MoE has a phone and email contact number and online submission of requests, suggestions and/or complaints vehicle, in addition to Government's central grievance centre: [www.11-11.mn](http://www.11-11.mn)<sup>2</sup> The MoE website specifies time frame for resolution of grievances (30 days, as per the law), names and office phone numbers of the relevant officers, and official spokesperson. The MoE also publishes annual reports on grievances<sup>3</sup>.

### 7.3 Grievance Mechanism

#### Purpose

- 7.3.1 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.

#### Goals

- 7.3.2 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-

<sup>2</sup> Available at <https://www.energy.gov.mn/app>.

<sup>3</sup> Available at MoE website at <https://energy.gov.mn/c/1575>.



based violence and harassment;<sup>4</sup>

- 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; and
- To enhance and continuously improve the ability of the Project to fairly address community concerns.

## Scope

7.3.3 The *Grievance Mechanism* should be consistent with the requirements of EBRDs PR10 and Good International Practice (GIP) whilst respecting Mongolian laws and regulations. The *Grievance Mechanism* is primarily for the community and public to raise relevant concerns about 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 complaint with the Project's activities.

7.3.4 For this Project, the following is proposed:

- A project-specific grievance channel will be set up on the MoE website and managed by the MoE/PIU.
- The Construction Contractor will set up a grievance mechanism during construction. The local community will be able to log grievances directly with the Construction Contractor before the grievance is escalated, if applicable, to a judicial or other national process.
- The Construction Contractor will inform the PIU of any grievances, who will in turn inform the MoE.
- The PIU will be responsible for ensuring that the local government/officials are involved, where applicable and where necessary, a joint team can be set up to investigate the grievance.
- During O&M, grievances will be addressed by the NPTG and their existing website.

7.3.5 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 GRM Procedure – Steps

7.4.1 All grievances will be:

- Acknowledged within 5 working days of receipt, by the entity receiving the grievance;

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<sup>4</sup> 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.

- The Construction Contractor will inform the PIU within 24 hours;
- The PIU will advise the MoE within 2 days;
- The MoE/PIU or Construction Contractor (as agreed between parties as relevant to the grievance) will respond within no later than 10 working days of the Complaint Date; and
- The MoE/PIU 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.

7.4.2 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 PIU. This will include:

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

7.4.3 This procedure is set out in **Appendix G**.

### Step 1: Register a Grievance

7.4.4 If a concern arises, the aggrieved person(s) can lodge grievances with the Construction Contractor CLO, verbally or in writing (letter, e-mail or on the Project Grievance Form (see **Appendix H**) or via the PIU website.

7.4.5 Where the complaint is received first by the Construction Contractor CLO, the CLO will inform the PIU of the grievance within 24 hours.

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

MoE	PIU CLO	Construction Contractor CLO
Attention:	Attention:	Attention:
Postal Address:	Postal Address:	Postal Address:
Tel:	Tel:	Tel:
Fax:	Fax:	Fax:
Email:	Email:	Email:
Website:	Website:	Website:

7.4.7 All complaints will be recorded at the point of contact on a Grievance Form (**Appendix H**). During construction, the Construction Contractor CLO will maintain a database of grievances (**Appendix I**) which will be shared with the PIU. The PIU will maintain a Central database of grievances.

7.4.8 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.

7.4.9 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.

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

## Step 2: Grievance Investigation

7.4.11 Within 5 working days of receiving the Grievance, the Construction Contractor or PIU CLO, as relevant, 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.

7.4.12 The Construction Contractor CLO, together as relevant with the PIU CLO and local government administrations 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 / Construction 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; and
- Conduct any measures, as agreed.

## Step 3: Grievance Resolution

7.4.13 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 Construction Contractor CLO (and other representatives as seen relevant) 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 Construction 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 Construction 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 Construction 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 Construction 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 Construction Contractor CLO (and other representatives as seen relevant) to a mutually agreed upon third-party to mediate, evaluate and propose non-binding resolution of the grievance.
- (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 Construction Contractor CLO (and other representatives as seen relevant) 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.

### Acknowledgement of a Satisfactory Process

7.4.14 At the resolution stage of a grievance negotiation, the Construction Contractor CLO (and other representatives as seen relevant) 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 aggrieved person 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?

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

### Processing Timeline

7.4.16 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.
- **Aggrieved Person resolution satisfaction assessment** – within 15 days of resolution closure.

## 7.5 Disclosure of Grievance Procedure

7.5.1 The *Grievance Procedure* will be made public through:

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

## 7.6 Managing and Tracking Grievances

- 7.6.1 The PIU will appoint a CLO to support and monitor delivery of the *Grievance Mechanism* during construction by the Construction Contractor. The Construction Contractor CLO will work with the PIU CLO.
- 7.6.2 The Construction Contractor will be expected to follow this *Grievance Mechanism*. 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.
- 7.6.3 The Construction Contractor shall ensure that all construction workers are aware of the *Grievance Mechanism*.
- 7.6.4 The Construction Contractor shall not reach any direct agreements or resolution with the complainant(s) without prior coordination of such actions with the PIU CLO.
- 7.6.5 The PIU CLO will conduct regular audits on the Construction Contractor to ascertain compliance with this *Grievance Mechanism*.

## 8 Monitoring and Reporting

8.1.1 Successful stakeholder engagement depends on performance monitoring, analysis and adapting to changed circumstances and stakeholder information needs. 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.

8.1.2 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

8.2.1 **Table 8-1** 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	Responsibility
SEPKPI01	Number of community complaints / grievances	Total number reducing year on year	Grievance Database	Construction Contractor
SEPKPI02	Number of complaints resolved within 1 month	Target 90%	Grievance Database	Construction Contractor
SEPKPI03	Reporting back to stakeholders on implementation of the Grievance Procedure	Delivery of quarterly reports to stakeholders on the outcomes of the Grievance Procedure	Reporting	Construction Contractor
SEPKPI04	Number of satisfaction assessment forms filled in by aggrieved persons	Target 90% of aggrieved persons have filled in a satisfaction form	Reporting	Construction Contractor
SEPKPI05	Number of community members in attendance at engagement activities	Participant numbers meet / exceed targeted attendance at activities	Stakeholder Engagement Register / Programme	Construction Contractor
SEPKPI06	Number of FGDs completed	Complete at least two FGDs with each type of focus group per year of construction, or in accordance with the	Reporting	Construction Contractor

ID	KPI	Target	Monitoring / Measure	Responsibility
		frequency agreed with local soum / bagh or directly with relevant persons/ groups		
SEPKPI07	Number of KIIs completed	Complete at least two KIIs with soum and bagh representatives per year of construction	Reporting	Construction Contractor
SEPKPI08	Number of bagh meetings attended	Complete at least one bagh meeting per year of construction	Reporting	Construction Contractor
SEPKPI09	Number of engagement records completed	100% of engagement activities recorded (including informal engagement)	Stakeholder Engagement Register	Construction Contractor
SEPKPI10	Number of engagements with vulnerable households	100% completion of planned engagement activities with all identified vulnerable households along the Project route	Stakeholder Engagement Database	Construction Contractor
SEPKPI11	Auditing SEP and Grievance Procedure 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	Construction Contractor (internal)  MoE / PIU / NPTG (external)

## 8.3 Key Monitoring Activities

8.3.1 The monitoring measures that are to be implemented for stakeholder engagement to ensure compliance with this SEP are described in **Table 8-2**.

Table 8-2 Monitoring Measures

ID	Topic/Aspect	Method	Responsible Party	Period/Frequency
SEPM01	Community Grievances	<p>Review Grievance Register, including grievances closed and those unresolved per period (at a minimum monthly but more likely as they occur) to include:</p> <ul style="list-style-type: none"> <li>number of outstanding complaints and grievances opened in the month;</li> <li>number of grievances opened in the month and evolution since Project start (graphic presentation);</li> <li>number of grievances closed in the month; and</li> <li>type of grievance.</li> </ul>	Contractor CLO	Monthly



ID	Topic/Aspect	Method	Responsible Party	Period/Frequency
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 / MoE PIU / NPTG	Quarterly
SEPM03	Community engagement activities	A bi-annual audit will be conducted of the Grievance Mechanism.	MoE PIU / NPTG	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.	MoE PIU / NPTG	Monthly

## 9 Audit and Reporting

### 9.1 Auditing

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

#### Internal Auditing

9.1.2 Conformance with the SEP will be subject to internal inspection regularly, and audit on an annual basis. Conformance will be monitored via a bi-annual internal audit programme. This internal auditing will apply to the Construction Contractor who will be expected to monitor their compliance to the required actions.

#### Contractor Auditing

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

#### External Auditing

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

#### Stakeholder Engagement and Grievances Database

9.1.5 All stakeholders contact details, engagement activities, and grievances will be maintained within a Stakeholder Engagement and Grievance Database to allow tracking and monitoring of the engagement process and all complaints received. Stakeholders' personal data will be kept confidential and safe and in line with national data protection requirements. The Database will include:

- 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).

9.1.6 All grievances should be recorded using the template in **Appendix I**.

9.1.7 All stakeholder meetings should be recorded in a Register such as the template provided in **Appendix F**; and meetings should be recorded using the Minutes of Meeting Template in **Appendix K**.



## 9.2 Reporting

- 9.2.1 All feedback from stakeholder engagement activities will be documented and reported, covering the following:

### Weekly / Monthly Reports

- 9.2.2 The Construction Contractor will prepare weekly and monthly reports to be submitted to the MoE/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.

- 9.2.3 The MoE/PIU will review this information and prepare monthly summary reports of all stakeholder engagement and grievances.

### Bi-Annual or Annual Reports

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

### Review and Revision of this SEP

- 9.2.5 This SEP will be updated by the PIU prior to the start of construction and shared with the Construction Contractor.
- 9.2.6 The Construction Contractor will prepare the CSEP, which will be reviewed during construction at a minimum of every six months, or at a frequency agreed with EBRD and the MoE/PIU.

During steady state operations, the CSEP 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 CSEP may also be updated on an “as required” basis in response to changes in planned works, etc.

## 10 Resources and Responsibilities

10.1.1 The MoE 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 MoE to manage Project implementation. A Construction Contractor will be commissioned to construct the Project and undertake the construction phase stakeholder engagement and grievance mechanism.

10.1.2 Principal roles and responsibilities for the implementation of the SEP are outlined in **Table 10-1** below.

*Table 10-1 Key Roles and Responsibilities*

Role	Responsibilities	Project phase
MoE	The MoE 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.	Pre-construction Construction
NPTG	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.	O&M
PIU	<p>A PIU will support the MoE in monitoring all stakeholder engagement activities, including those of Construction Contractor and ensure the consistency of information provided to stakeholders by the various parties.</p> <p>The PIU will be responsible for appointing technical specialists to effectively audit the implementation of environmental, social, and health and safety measures and processes. Specialists include:</p> <ul style="list-style-type: none"> <li>• Community Liaison Officer (CLO) - Responsible for conducting regular consultations with affected communities on any concern regarding the Project.</li> <li>• Environmental Supervisor - will be responsible for regularly auditing the implementation of this ESMP. They will be suitably competent, have a knowledge of archaeology, heritage and biodiversity, and have a strong understanding of environmental best practice.</li> </ul> <p>The CLO will develop the Project SEP and outline Engagement Programme that the Construction Contractor will be expected to follow.</p> <p>The PIU will be responsible for ensuring that the Construction Contractor is aware and has a copy of the Project SEP and the Construction Contractor develops a CSEP and Engagement Programme in line with the Project SEP.</p> <p>Other responsibilities of the CLO will include supporting the oversight of the stakeholder engagement process and auditing of any Construction Contractor stakeholder engagement activities; managing project interfaces with the bagh representatives.</p>	Pre-construction Construction
Construction Contractor Community Liaison Officer (CLO)	The Construction Contractor will identify a CLO within their organisation who will be responsible for stakeholder engagement and grievance during construction.	Construction

Role	Responsibilities	Project phase
	<p>The Construction Contractor will be required to develop and deliver a detailed SEP/Construction Engagement Programme for the construction phase, for MoE/PIU approval.</p> <p>The Construction Contractor will also be responsible for managing the Grievance Mechanism during construction. With oversight from the MoE/PIU CLO.</p> <p>The Construction Contractor CLO will manage the Grievance Database.</p>	
Bagh representatives	Will be a key contact point for residents who want information about the Project or who have an issue they would like to discuss and informing the MoE/PIU/Construction Contractor of any local issues associated with the Project.	Construction



Arcadis Consulting (UK) Limited

80 Fenchurch Street

London EC3M 4BY

United Kingdom

T: +44 (0)20 7812 2000

[arcadis.com](https://www.arcadis.com)