

Georgia, Ajara Autonomous Republic:  
Ajara Solid Waste Management Project

Stakeholder Engagement Plan (SEP)

April 2015  
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## List of abbreviations

EBRD	European Bank for Reconstruction and Development
EHS	Environmental health and safety
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
EU	European Union
GHG	Greenhouse Gas (e.g. methane, carbon dioxide and other gases)
Ha	hectare
HH	Households
HR	Human resources
Km	kilometer
R/LRF	Resettlement/Livelihood Restoration Framework
M	meter
MIS	Management Information System
MoFE	Ministry of Finance and Economy of Ajara
OHS	Occupational Health and safety
PAP	Project affected people
PR	Performance Requirement
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SWC	Solid Waste Company
SWM	Solid Waste Management
ToR	Terms of Reference

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## 1 Introduction

The Republic of Georgia and the Autonomous Republic of Ajara is planning to construct a new EU compliant sanitary landfill facility and close three non-complaint landfills to improve the solid waste management in the Ajara region. The project is called the “Ajara Solid Waste Project”. Project owner and initiator is the Ministry of Finance and Economy, MoFE. To undertake the activities related to the implementation of the project – e.g. procurement, construction, operation, closure – MoFE has created the company Hygiena Ltd. Hygiena Ltd will operate according to the directives provided by MoFE. This document aims at guiding the activities carried out by MoFE and by Hygiena, during the different phases of project implementation.

This Stakeholder Engagement Plan (SEP) describes the MoFE/Hygiena Ltd approach to engaging with stakeholders, which include project affected people (PAP) so that they have an opportunity to voice their opinions and concerns, and these concerns can influence Project decisions. It is a strategy for the provision of timely information on the project and details of the grievance mechanism(s) that will be utilised for the project, particularly during construction and operation phases of the new landfill facility. The SEP may also be relevant for customer relations during operation.

Primarily, the SEP presents the general principles, as well as mechanisms and tools which are to be used by the MoFE/Hygiena Ltd for engaging the stakeholders throughout the Project lifecycle, including the procedures for raising a complaint or grievance in relation to landfill closures and start up.

This SEP is a living document, which will be revised and updated on an on-going basis in the course of the Project lifecycle.

## 2 Brief Project Description

Ajara Solid Waste Project aims to improve the solid waste management (SWM)<sup>1</sup> in Ajara and focusing initially on the City of Batumi (population 160,000), Kobuleti district (population 90,000) and Khelvachauri district (60,000)<sup>2</sup>. The project involves construction of a new landfill facility in Tsetskhlauri and the closure of three non-compliant landfills in Batumi and Kobuleti. The dumpsites need to be closed as soon as possible because of the poor conditions observed within and around the sites. The financial allocation in the investment programme is not enough to cover the costs of a final closure according to the EC Directive on landfills. It is therefore proposed that procedures for covering are made at a robust and affordable level. This means applying a final cover on the waste consisting of a low-permeable soil and a vegetation cover. A natural passive methane oxidising filter will be placed in the upper part of the reshaped dumpsite to reduce emissions of greenhouse gases to the atmosphere. The territory should be guarded after the closure to prevent unsanctioned dumping and waste picking in the area. Monitoring equipment should be also protected.

The local Environmental and Social Impact Assessment (ESIA) has been disclosed in September 2014. The final version can be accessed at the Ministry of Finance and Economy. The EBRD ESIA has not yet been disclosed.

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<sup>1</sup> Municipal solid waste: waste generated by households, residential areas, commercial establishments, non-hazardous industrial waste, waste generated by institutions (non-hazardous hospital waste, schools, offices, hotels, etc.).

<sup>2</sup> Population with SWM services from Municipality owned waste management company (Sandasuptaveba Ltd, 2013

As described in the ESIA, a census and a Resettlement Action Plan (RAP) are required for waste pickers working at Batumi and Kobuleti landfills, people living on the landfill (North and South) and close to the landfill border (North), and people affected by the Tsetskhauri landfill area near the sanitary zone, respectively. A Resettlement/Livelihood Restoration Framework (R/LRF) is under development.

## 2.1 Closure of Batumi and Kobuleti

The closure of the dumpsites will reduce or prevent:

- Spreading of wind-blown wastes
- Access to the site (access road will be closed)
- Generation of leachate water and its drainage into the surrounding water bodies
- Landfill gas emission to the atmosphere
- Spreading of odour
- The risk for fires and
- Unhealthy informal recycling activities
- Reduce risk of diseases related to waste (viral and/or parasitic)

## 2.2 Construction of Tsetskhauri landfill

The construction of the Tsetskhauri landfill facility is expected to last for approximately 16 months. Construction work is expected to start in Mid -2015.

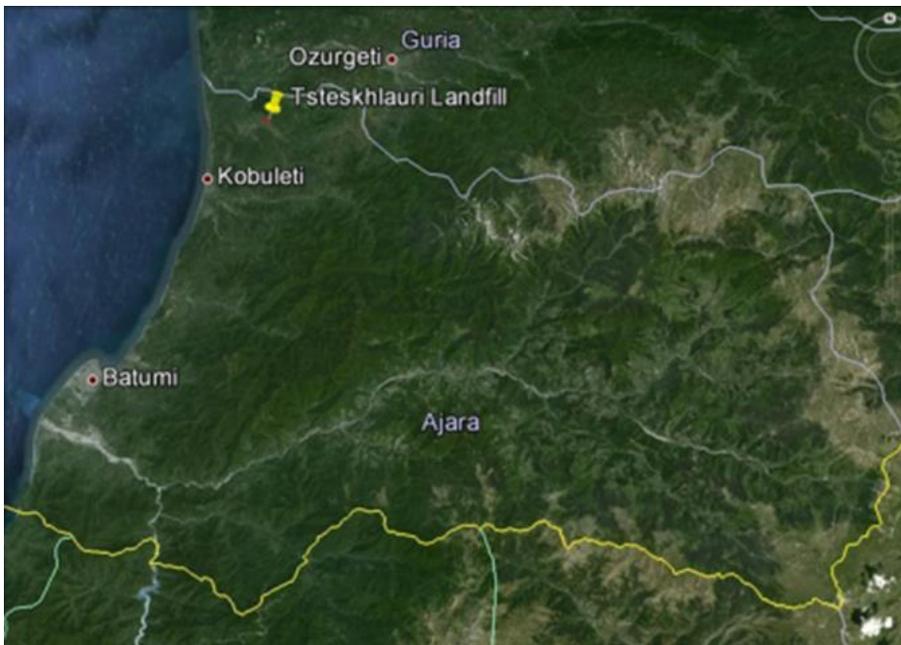


Figure 1 Site Location (source: Google Maps, 2012)

The proposed landfill site is located approximately 6 km from the Black Sea shore-line, 10 km from City Kobuleti and 45 km North East of Batumi (Figure 1). The area is currently mainly used for grazing and a few smaller maize fields. Vegetation is sparse and meagre. Adjacent to the

landfill site, groundwater is found close to the surface and bushes grow dense. Forested areas are found North and East of the landfill site. The landfill will be compliant for non-hazardous waste with the EC Directive 99/31/EC. It will be designed to receive an estimated 75 000 tonnes of municipal waste annually. The area of the landfill will be approximately 11.5 hectares.

Within "Ajara Solid Waste Management Project", for the construction of solid waste landfill in the village Tsetskhauri, municipality of Kobuleti, consultant company SWECO has used the 2007-2010 years' information about the amount of waste for the primary research. However, during 2011-2013 the volume of solid waste collected in the Autonomous Republic of Ajara has sharply increased from 50 000 to 70 000 tons per annum. Reason behind this change is the unified system of collection of solid waste from the population of whole administrative area of Ajara. Moreover, in the near future volume of solid waste supplied to the new landfill is expected to rise gradually to 75 000 tons per annum. Exploitation period of the landfill is 21-35 years (35 years in case of strengthening the waste recycling sector). The total cell area is 11,5 hectares with the height of 15 meters.

The landfill will include the following ancillary facilities:

- Access road
- Perimeter fence, gate and information board
- Weighbridge and waste registration office including guard house
- Administration building including office space
- Staff building including sanitary facilities
- Internal roads, parking area and lighting
- Workshop and wheel wash facility
- Sorting and storage facilities for recyclables and hazardous waste
- Surface water collection and storage
- Sewage water, water (drinking/raw water), electricity and communication
- Leachate collection and treatment system
- Landfill gas generation and collection, torch, energy utilisation unit
- Vehicles necessary for the operation

The landfill will be comprised of smaller cells to allow for minimum open waste surface and operational control. Figure 2 shows the proposed layout of the site.

The landfill bottom construction will consist of an impermeable sealing layer consisting of stone powder, bentonite and HDPE liner below a drainage layer for collection of leachate. Waste will be deposited directly into the cell currently in operation and will be distributed and compacted by an excavator/compactor. Compacted waste will be covered daily with a minimum of 5 cm soil or other suitable material.



Figure 2 Proposed Site Layout<sup>3</sup>

## 2.3 Organisation

The Ministry of Finance and Economy, Government of Ajara, is the owner of the new landfill company, Hygiena Ltd. Hygiena Ltd. was created to own and operate the new sanitary landfill facility in Tsetskhauri. During the initial phase of the project, the Government of Ajara (represented by the Ministry of Finance and Economy - MoFE) has been the project owner. During project implementation (construction and operation phase), the company Hygiena will be the project owner and run the operations at Tsetskhauri as well as the closure of the old landfills.

A Steering Committee of representatives from Ministry of Finance and Economy of the Autonomous Republic of Ajara (ARA), Department of Environmental Protection of ARA, Hygiena Ltd, and the Municipalities of Batumi, Kobuleti and Khelvachauri has also been engaged in the project.

## 3 Applicable Regulations and Requirements

Regulations and requirements on consulting and disclosing information to the public applicable to this Project include national regulations with regard to access to information, public participation in environmental matters and acquisition of land, EBRD Requirements and International Regulations. Key applicable requirements are presented in Appendix 3 of this SEP.

<sup>3</sup> Sweco (2014).

## 4 Stakeholder map

Stakeholders are persons and/or entities who:

- are directly and/or indirectly affected by the Project (or the Company’s operations);
- have “interests” in the Project or a Company that determine them as stakeholders; and/or
- have the potential to influence project outcomes or company operations.

The list provided below is to be updated and revised throughout the Project implementation. This document focuses on the MoFE/Hygiena Ltd dialogue with external stakeholders, while the internal consultation (e.g. with employees at Hygiena Ltd) will be handled by Hygiena Ltd management.

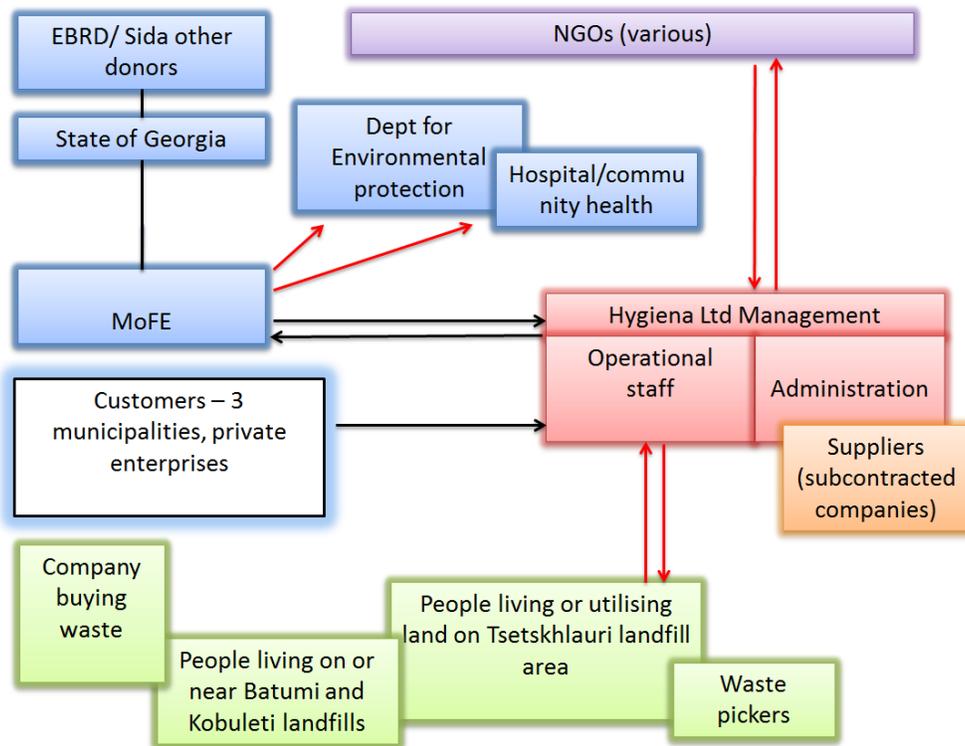


Figure 3 Illustration, stakeholder map

The illustration shows that a range of stakeholders are necessary to keep in mind for communication and information disclosure. Each stakeholder will have different needs, possibilities for engagement and likely require different methodologies in order to get the results needed to get a smooth project implementation that is at the same time beneficial to affected communities.

#### 4.1 Key stakeholders (owners, donors, state and overall responsible agencies) - in blue

Stakeholder	Areas of responsibility/ Comment in relation to the project only	Type of Impact/ Interest
EBRD	N/A	Results (reporting)
Sida	N/A	Results (reporting)
State of Georgia	Guaranteeing loan	Ultimately responsible to population
MoFE	Loan, owner of Hygiena Ltd. Head of steering committee Department for donor relation (iunder depart. For economic development)  Dep. of enterprise and monitoring management will monitor contractual issues.	Taxes and fees from landfill, improved health and environmental conditions Will be held responsible for project management and results
Dep. for Environmental Protection	Part of Steering committee Overall responsible monitoring of environmental impacts Agency for environmental protection will perhaps monitor how waste pickers are handled (to be clarified). Oerall Monitoring that Hygiena fulfils their responsibilities (key figures on water and gas).	Partial responsible for project management and results,
Ministry of Labor, Health and Social Affairs of Georgia; National Center for Disease Control and Public Health (NCDC)	Overall responsible monitoring of community health impacts.  Overall responsible to react in case community health is affected by the operations of the company. Doe not make unannounced inspections on landfill, nor in surrounding community.  Overall responsibility for social issues	Public health
Ministry of Culture, Monuments Protection and Sports; Dep. of Monuments Protection, and Centre of Archaeological Search	Only involved in case of chance finds. Have already recommended permission	Protection of cultural heritage

#### 4.2 Hygiena Ltd (management, operational and administrative staff) – in red

Stakeholder	Areas of responsibility/comment in relation to the project only	Type of Impact/interest
Management (female and male)	EHS management and monitoring, HR policies/planning and implementation, OHS, cultural heritage, sub-contracting, Resettlement and economic displacement in relation to closure of landfills and opening of landfill, supplier relations, reporting to MoFE, reporting to EBRD/Sida	Part of PIU Work
Operational staff (female and male)	Carry out works on landfill	Work, access to labour rights
Administrative staff (female and male)	Support management in execution of decisions and daily operation	Work, access to labour rights

#### 4.3 Supplier (e.g. for closure, construction and RAP) – in orange

Stakeholder	Areas of responsibility/comment in relation to the project only	Type of Impact/interest
Sub-contracted companies	E.g. RAP, construction works, technical assistance	work

#### 4.4 Customers (municipalities and industries) – white

Stakeholder	Areas of responsibility/comment in relation to the project only	Type of Impact/interest
Kobuleti, Batumi and Khelvachauri municipalities	Ensure solid waste services directly to customers, safe transportation to landfills	Infrastructure development and adaptation, Waste management service, environmental conditions (risks and improvements), financial considerations
Industries (See attached list of potential private enterprises with specific interest)	Pay for services and act according to contracts	Gate fees and transportation cost
Individuals disposing large quantities of waste and using services of the Project Owners (new and existing dumpsites).		Gate fees and transportation cost
Residents in Kobuleti, Batumi and Khelvachauri municipalities	Residents in affected areas and household waste producers	Affected by tariff changes, affected by waste management efficiency

#### 4.5 Project affected population (at existing and planned landfills) – in green

Stakeholder	Areas of responsibility/comment in relation to the project only	Type of Impact/interest
Waste pickers at Batumi and Kobuleti landfills	N/A	Income loss
People living in shelters at Batumi landfill	N/A	Loss of shelter and/or home
Households located along the traffic routes of waste trucks	N/A	Potentially disturbed by heavy and traffic
Farmers cultivating land (use for cattle) adjacent to the proposed landfill site	N/A	Potential income loss
People living within Tsetskhlauri landfill area	N/A	Income loss and loss of home
People living within or close to sanitary zone of Tsetskhlauri landfill (some with vulnerable groups: people below poverty line, people with disabilities)	N/A	Potential income loss and loss of shelter and/or home (incl. diminished property value)
People living in surrounding villages to Tsetskhlauri landfill (some with vulnerable groups: people below poverty line, people with disabilities)	N/A	Potential income loss (if utilising landfill area) diminished property value

#### 4.6 NGOs – in purple

Stakeholder	Areas of responsibility/comment in relation to the project only	Type of Impact/interest
Green Alternative	Black Sea Ecological Academy – no rep in Ajara, but had comments about the projects – good relations.	Improved health Environmental and social considerations
CENN – Caucasus Environmental NGO Network	Have been involved, They had comments and remarks for the old project – have not yet reacted upon this project.	Knowledge about waste management Can positively or negatively affect people attitude to landfill
Green Movement / Friends of the Earth International, Tbilisi	Have also been involved. Involved in public hearings.	Have been supporting the project

#### 4.7 Others

Stakeholder	Areas of responsibility/comment in relation to the project only	Type of Impact/interest
Local community leaders (in Tsetskhlauri)	N/A	Impact on community attitude to landfill
Religious leaders	N/A	Impact on community attitude to landfill
Rayon Administrations of Autonomous Republic of Ajara: Emergency services, fire brigade and local police	N/A	Risk management,
Rustavi TV and newspapers	N/A	Information disclosure, reporting mismanagement
National TV and newspapers	N/A	Information disclosure, reporting mismanagement

## 5 Previous Stakeholder Engagement Activities

During the pre-feasibility stage, meetings were organised with the local communities to present information about the project concept, considered alternatives, etc. This consultation process is described in the Pre-Feasibility Report<sup>4</sup>.

Once the project site was identified, a preliminary Environmental Impact Assessment (EIA) report was prepared to provide basis for the consultation process during the scoping phase, during which all key stakeholders were invited to raise questions and put forward their views. The preliminary EIA report was approved by the local authorities July 2014. Several opportunities to access information and to put forward questions or comments have been provided during the process, and a local hearing took place on the 8<sup>th</sup> of September 2014 in Kobuleti Municipality.

Generally, it is the responsibility of the acting Representative of Tsetskhlauri to call people to meetings upon governmental request, no taxation or registration of any sort is carried out by this person. Acting representative confirms that the Ministry made interviews with the villagers, but does not know how many where interviewed or where.

Practically, meetings and consultations are currently being carried out by the Acting Representative calling the people he knows on telephone, and they will then inform their neighbours. No written invitation or any written information goes out in general for or before such meetings. In relation to the landfill, no written documentation has been shared with villagers or directly affected people. According to acting Chairman people are well-informed, which is contradicted by the lack of real information, which was reconfirmed in the interviews made with the people with houses on and just outside landfill. There is a need to organise meetings in a more structured way.

The initial activities by the Consultant during the process are included in the below in Table 1. Stakeholder Engagement Plan, these are indicated The SEP is, however, mainly a tool for future use of the government of Ajara. It should consequently also be seen as a living document that should be continuously updated and revised should actions not lead to expected results.

<sup>4</sup> Sweco (2012). Pre-Feasibility Report.

## 6 Stakeholder Engagement Plan

Planned activities to ensure stakeholder engagement and proper public consultation processes are summarized together with already undertaken activities in the table below, Table 1. Stakeholder Engagement Plan. Certain activities and information disclosure relating to e.g. land acquisition process, health and safety has been undertaken, e.g. regional authorities have visited the sites to register assets at affected houses/plots, please refer to ESIA document.

All communication has been/will be in Georgian language. Documents being part of the EBRD process are/will be available also in English.

All activities carried out within the framework of the Stakeholder Engagement plan should be carried out with a gender perspective, this includes, but is not limited to:

- Disaggregating all statistics on incoming complaints and how they are handled to ensure female and male customers are treated equally.
- Take into account that customer/communication outreach might need tailoring to reach both women/men/boys and girls with messages related to environmental behavior.
- Take into account that women, generally and as a group (will be exemptions) are not included in public decision-making to the same extent as men in Georgia, which can affect their access to information, input to solutions as well as possibilities to influence. Equal access can potentially contribute to better solutions as well as higher willingness to pay for services.
- Take into account that women and men in Georgia have different payment/debt experience, which could affect willingness to pay for services.
- Take into account that women, generally and as a group (there will be exemptions) will have lower incomes for paid work, which could affect affordability.

The title of the ESIA Study disclosed in July 2014 was "Environmental and Social Impact Assessment for Autonomous Republic of Ajara Waste Management Project".

**Table 1. Stakeholder Engagement Plan**

All activities related to PAPs in this SEP are to be verified or discharged by the Resettlement Action Plan. This SEP contain overall outreach, communication and information disclosure activities, but detailing these will be required as the project is being started and implemented.

No.	WHAT Communication /information disclosure	WHOM Receivers of message or in communica tion	WHY Argumentation for needed actions, requirement	HOW Means of communication	WHO Overall responsible manager	WHEN Timeframe	Indicators or Means of verification
<b>1.</b>	<b>Project preparation phase</b>						
1.1	Ensure high level coordination on all aspects related to the opening and closure of landfills, clarify roles and responsibilities in al aspects of the project implementation in different phases.	Ministerial agencies	Ensure information is coherent and shared, increase possibility for coordination and usage of staff in an efficient manner (EBRD PR 10)	A series of meetings immediate and after project start: - at Ajara committee level - Inter-ministerial level	MoFE	Before project start and updating continuously list of responsibilities as needed	# of meetings participants (disaggregated by sex)  Minutes from meetings
1.2	Has already been undertaken:	Affected population, public and	Notification should be made also in writing and handed out to	- Announcement in Local newspaper: "Adjara" (Batumi),	The Directorate for Environmental Protection of	Before project start (14 of Sep	List of participants

No.	WHAT Communication /information disclosure	WHOM Receivers of message or in communica tion	WHY Argumentation for needed actions, requirement	HOW Means of communication	WHO Overall responsible manager	WHEN Timeframe	Indicators or Means of verification
	Notify stakeholders and general public of a Project public hearing as part of the national EIA (in Georgian language and in English).	private sector enterprises  National, local and regional Authorities  NGOs  General public	households (to increase likelihood that people with no internet access and especially women are informed).  Law on Environmental Impact Permit (EBRD PR10)	"24 hours" (Tbilisi)  - Announcement in CENN Network <sup>5</sup> and REC Caucus Network  - Announcement and disclosure at website <sup>6</sup> Notifications on announcement boards at relevant authorities <sup>7</sup>	Autonomous Republic of Ajara  MoFE	2014).  It is proposed to have a new public hearing when R/LRF/RAP is in place, mainly since ESIA was not finalised, Sand EP and ESAP not distributed.	Minutes of meeting
1.3	Disclose SEP, ESIA and ESAP and national EIA-related documentation (in Georgian language).	Affected population, public and private sector enterprises  National,	For mutual project understanding  To increase awareness and possibilities to mitigate issues that cannot be	Announcement in Central and Local newspaper  Announcements through:  -CENN Network and REC	The Dir. for Environmental Protection	Disclosure 50 days prior to the national EIA public hearing  Comments accepted up to	# of meetings participants (disaggregated by sex)  Minutes from

<sup>5</sup> Website of the network of Environmental NGOs: [www.cenn.org](http://www.cenn.org)

<sup>6</sup> Websites include the website of the Directorate for Environmental Protection of Autonomous Republic of Adjara [www.denr-adjara.ge](http://www.denr-adjara.ge) and the website of the Ministry of Environment Protection of Georgia [www.moe.gol.ge](http://www.moe.gol.ge)

<sup>7</sup> Relevant authorities include: Ministry of Finance and Economy of Autonomous Republic of Adjara; Ministry of Environmental Protection of Georgia (MoE); Directorate for Environmental Protection of Autonomous Republic of Adjara; Ministry of Economic Development; Ministry of Labour, Health and Social Affairs of Georgia; and the Municipalities of Batumi, Kobuleti and Khelvachauri.

No.	WHAT Communication /information disclosure	WHOM Receivers of message or in communica tion	WHY Argumentation for needed actions, requirement	HOW Means of communication	WHO Overall responsible manager	WHEN Timeframe	Indicators or Means of verification
	In accordance with the Law on Environmental Impact Permit.	local and regional Authorities  NGOs	foreseen at this stage  EBRD PR10	Caucasus Network  - Local radio/TV  - Flyers handout to PAPs		120 days after public hearing	meetings  Via website <sup>8</sup>  # of flyers produced and handed out.
1.4	In line with 1.3: Ensure local governments understand and are included in all steps of the project implementation	Local governments that will deposit waste at Tsetsklauri (Batumi, Kobuleti and Khelvachaur)	Ensure messages to public are coherent  Ensure local governments understand project details, risks and possibilities.  Ensure local governments (PR 10)	A series of meetings between: Local government representatives, MoFE and Hygiena Ltd  Discussion on feasibility study Discussions on ESAP Discussions on SEP	MoFE and Hygiena Ltd	At project start and throughout the project	# of meetings (participants disaggregated by sex) and subject of meetings  Minutes from meetings
1.5	In line with 1.3: Ensure municipalities	Batumi and Kobuleti municipality	Understand social responsibility for waste pickers (PR 5 and 10)	Meeting between Hygiena Ltd, MoFE and municipalities  Discussion on R/LRF and RAP	MoFE and Hygiena Ltd. Coordination with RAP consultant	At project start	# of meetings (participants disaggregated by sex) and subject of

<sup>8</sup> Websites where documentation was disclosed: [www.denr-adjara.ge](http://www.denr-adjara.ge), [www.moe.gol.ge](http://www.moe.gol.ge)

No.	WHAT Communication /information disclosure	WHOM Receivers of message or in communica tion	WHY Argumentation for needed actions, requirement	HOW Means of communication	WHO Overall responsible manager	WHEN Timeframe	Indicators or Means of verification
	and project are coordinated in relation to waste pickers (pls refer to 1.6 and 1.7)						meetings  Minutes from meetings
1.6	PAPs are informed about closure of Batumi and Kobuleti landfills (please also refer to RAP)	Waste pickers at Batumi and Kobuleti landfills, Waste pickers living on Batumi landfill, farmers living on Batumi landfill or on boarder to Batumi and Kobuleti landfills.	PAPs understand proposed framework, understand grievance mechanism, (PR 5 and 10)	Project public hearing as part of the national ESIA, ESAP and SEP. (in Georgian language and in English).  A series of meetings (to be detailed)  Notifications on the Project Owner's and relevant PM websites, local information boards, local mass media, directly enterprises and municipal service organisations.  Notifications via operators and at the landfills main entrance	MoFE/Hygiena Ltd.  Consider external RAP consultant to carry out meetings	Start this work within the first 3 months of project.	# of meetings (participants disaggregated by sex) and subject of meetings  Minutes from meetings
1.7	PAPs are informed about Tsetskhlauri	People living within landfill	PAPs understand proposed framework, understand grievance	See also 1.2 and 1.3 Set up a series of individual and community meetings as	MoFE/Hygiena Ltd.  Consider external	Start this work within the first 3 months of	# of meetings (participants disaggregated

No.	WHAT Communication /information disclosure	WHOM Receivers of message or in communica tion	WHY Argumentation for needed actions, requirement	HOW Means of communication	WHO Overall responsible manager	WHEN Timeframe	Indicators or Means of verification
	landfill (please also refer to RAP)	areas, within or close to sanitary boarder, people in villages	mechanism, (PR 5 and 10)	appropriate. Individual meetings with directly affected population and larger meetings with people from surrounding village.	RAP consultant to carry out meetings	project	by sex) and subject of meetings  Minutes from meetings
1.8	Disseminate information about anticipated construction activities that might affect stakeholders, ensuring that PAPs are informed about what will be constructed and when	EBRD PR10	Affected population, public and private sector enterprises	Website Mass media/radio  Use of leaflets on project start, implications and processes distributed to each household (app 450) households.  Arrange an information board on a proposed landfill site.	MoFE/Hygiena Ltd  (in cooperation with local authorities, e.g. head of villages)	4 months prior to construction activities	# leaflets produced and distributed  Website

No.	WHAT Communication /information disclosure	WHOM Receivers of message or in communica tion	WHY Argumentation for needed actions, requirement	HOW Means of communication	WHO Overall responsible manager	WHEN Timeframe	Indicators or Means of verification
<b>2. Construction Phase</b>							
2.1	<p>Keep stakeholders informed on any project or construction-related activities that might affect them.</p> <p>Construction of roads Construction of landfill (noise, dust)</p>	<p>Affected population, public and private sector enterprises</p> <p>Municipal service organisations</p>	<p>Ensure key stakeholders are informed and can act/adapt to construction activities EBRD PR10</p>	<p>Notifications on the Project Owner's website, local information boards, local mass media, directly enterprises and municipal service organisations.</p> <p>Arrange the hot-lines of the company and municipality</p>	<p>MoFE/ Hygiena Ltd., in cooperation with local authorities, if required</p>	<p>(sufficiently in advance and at least 1 week prior to any activities)</p>	<p># leaflets produced and distributed</p> <p>Website</p> <p>Carry out and measure results from community satisfaction survey in relation to the project (disaggregated results by sex)</p>
<b>3. Operational Phase</b>							
3.1	<p>Regularly review, update and disclose updated SEP, and ensure its timely implementation.</p>	<p>Affected population, public and private sector enterprises</p> <p>National, local and</p>	<p>Ensure people are informed about grievance mechanism (both for PAPs and for customers)</p>	<p>Disclose on website</p> <p>Should be available at municipalities</p> <p>EBRD PR 10</p>	<p>MoFE/ Hygiena Ltd.</p>	<p>On-going, at least annually</p>	<p># of updated SEPs</p> <p># of meetings at MoFE/Hygiena on SEP</p>

No.	WHAT Communication /information disclosure	WHOM Receivers of message or in communica tion	WHY Argumentation for needed actions, requirement	HOW Means of communication	WHO Overall responsible manager	WHEN Timeframe	Indicators or Means of verification
		regional Authorities  NGOs  General public					
3.2	Awareness about customer responsibilities	Municipalities and private enterprises/person customer to Tsetskhlauri landfill	<ul style="list-style-type: none"> <li>- Reduce waste generation</li> <li>- Increase waste separation rate at source</li> <li>- Increase public awareness &amp; engagement</li> <li>- Increase public and private payment of bills</li> </ul>	<ul style="list-style-type: none"> <li>- TV and Radio with short messages directed at people who potentially will be transporting private waste to landfills</li> </ul>	Hygiena Ltd. in close coordination with the municipal services	Start investment project (when general information is shared about the investment)	<ul style="list-style-type: none"> <li>- No. TV/radio spots</li> <li>- No. of new service contracts that also includes customers responsibility in relation to the landfill.</li> </ul>
3.3	Emergency communication	Staff  The public, local authorities  Neighbours	In case of e.g. fire/explosion inform about the situation.	<ul style="list-style-type: none"> <li>- TV and Radio</li> <li>- Alarm system at site</li> </ul>	MoFE/Hygiena Ltd.	During construction and operational phase	Routine in place

## 7 Grievance Procedure – related to ESIA, R/LRF and RAP

This chapter contains a general grievance mechanism proposal to be considered by R/LRF and RAP design and implementation. There is a need to adapt these procedures in more detail, especially in relation to methodologies for how to ensure PAPs have access to grievances. Some might not be able to read, many have no internet access, and PAPs' knowledge about their rights and duties is expected to be low.

A grievance can be defined as an actual or perceived problem that might give ground for complaint. As a general policy, the Directorate for Environmental Protection of Autonomous Republic of Ajara will work pro-actively towards the prevention of grievances through the implementation of impact mitigation measures and community liaison activities, with the aim to ensure that potential concerns are identified and addressed before they become grievances. The Directorate for Environmental Protection of Autonomous Republic of Ajara and municipalities of Batumi and Kobuleti will be the main Responsible Bodies for grievances related to the project.

### 7.1 Reasons for grievance

Examples of issues that may be subject for grievances are given below:

- Anticipated impact of the new landfill on the natural environment: air and water quality, potential spread of contamination on surrounding land plots, disfiguration of landscape, nuisance related to smell.
- Potential health and safety issues related to the abovementioned primary environmental impacts.
- Decommissioning of the existing landfills in Batumi and Kobuleti: lasting contamination and nuisance due to improper decommissioning and related health problems and economic losses.
- Improper planning of waste collection: communities not covered by the waste management plan; inefficient services provided for particular communities etc.

A separate grievance process must be developed for resettlement related issues, please refer to Resettlement Action Plan for the Ajara project. Resettlement issues may relate to the settlements Tsetskhlauri, Jikhanjuri and Ochkhauri, or economic losses related to the abovementioned primary environmental impacts (agriculture, tourism).

### 7.2 Grievance procedure

This grievance procedure applies to MoFE /Hygiena Ltd, as being owners of the Project.

#### Table 2. Grievance Review Process

##### Grievance Review Process

In some instances it may be possible to resolve a grievance straight away. Where this is not possible, MoFE/Hygiena Ltd will work through the steps shown below.

##### **Step 1: Receive Complaint**

Once notification of a problem has been received, one specific person will be assigned to be responsible for resolving the grievance.

##### **Step 2: Acknowledgement**

The assigned person will acknowledge receipt of a grievance in writing within 10 working days of having received the grievance. This acknowledgement will name the assigned contact person and the anticipated target date for resolution.

##### **Step 3: Investigation**

The assigned person will investigate the cause of the grievance and, if relevant, identify necessary mitigation measures. There may be a need to contact the claimant during this time.

The assigned person will report his/her findings and MoFE/Hygiena Ltd will make a decision on how to act upon the grievance.

##### **Step 4: Resolution**

Once the grievance has been investigated, a response will be sent to the applicant including the results of the investigation and the proposed course of action.

If the grievance remains unresolved, a further dialogue with the claimant will be held to discuss if there are any further steps which may be taken.

**Step 5: Follow Up**

MoFE/Hygiena Ltd may contact the applicant at a later stage to ensure that no further problems have arisen.

All grievances shall be monitored by MoFE/Hygiena Ltd so as to ensure that every issue is properly treated and resolved.

The grievance mechanism will be made public throughout the public consultation process, and will be maintained during project preparation activities.

If a complainant is not content with the outcome, regular procedure according to Georgian legislation will apply. The complainant may go to Court with the complaint.

During project implementation, i.e. during operation of the new landfill and closure of the two existing non-compliant landfills, the grievance mechanisms for the project explained above will still be operational. In addition to this, the company operating the new landfill, Hygiena Ltd., will implement procedures for handling of both external and internal complaints as part of the company management rules.

**7.3 How to submit grievance**

There are several ways a claimant may report a grievance:

1. Send a letter or an email to MoFE or to Hygiena Ltd;
2. Contact an employee at MoFE or Hygiena Ltd by phone or in person.
3. It will also be possible to leave a completed Grievance Form at the gate of the landfill site.

Address: #124 V.Gorgasalii Str., 6010, Batumi, Directorate for Environmental Protection of Autonomous Republic of Ajara.; or email: [koncelidze@rambler.ru](mailto:koncelidze@rambler.ru); or phone: 577 232227

Complaints or grievances may also be submitted incognito. In cases where the claimant is unknown, the same procedure will apply.

**7.4 Incorporation of comments in ESIA**

One of the important purposes of the Consultation of Stakeholders during the ESIA process is to improve the quality of the ESIA. Comments provided during the consultation of stakeholders have been and will be taken into account carefully. The following principles have been and are guiding the incorporation of comments in the plans:

- All comments will be documented with details of sender of comment
- Feedback will be provided to all comments raised by any stakeholder
- All comments will be assessed on their relevance for the ESIA
- The content of all comments will be assessed on their feasibility
- The comments will, when considered relevant, influence the development of the project and the ESIA.

**8 External grievance – customer/public**

MoFE and Hygiena Ltd will have procedures in place so as to ensure customers' willingness to pay for their services.

The customer grievance structure is similar to that of grievance, presented above.

It is essential that costumers and general public will know who to contact, when this is feasible, telephone number, e-mail address and visiting address.

All forms of delivering a complaint should be possible for customers (e.g. e-mail, letters, in oral, telephone, sms). All grievances will be registered when they come in and be reported upon so it is clear what happened to the complaint. Example of procedure for handling a complaint is given below:

- Registration of the complaint:
  - How the complaints came about (telephone, in person, via the municipality, in writing etc.)
  - Who issues the complaint (disaggregated by sex)
  - What the complaint was about
  - Date
  - Place

- Who received the complaint at the waste company
- Handling of the complaint:
  - How it should be prioritised
  - Who at the waste company and outside the waste company (e.g. public) must be informed
  - Who at the waste company should be responsible for dealing with the complaint
  - Minimum requirements in communication with the complainer (call, visit, follow-up) of the responsible officer at the waste company.
  - Timeframes and quick response procedures
  - Set up of committees if conflicts arises (resolution committees, these should consist of equal number of men and women)
  - Forms to be filled in by the waste company staff
- Reporting:
  - Annual basis (if required more frequently) in the Performance Report
  - Should entail what kind of complaints, frequency, area, what service was provided (why and why not, as well as statistics on female/male complainants and how complaints were dealt with)

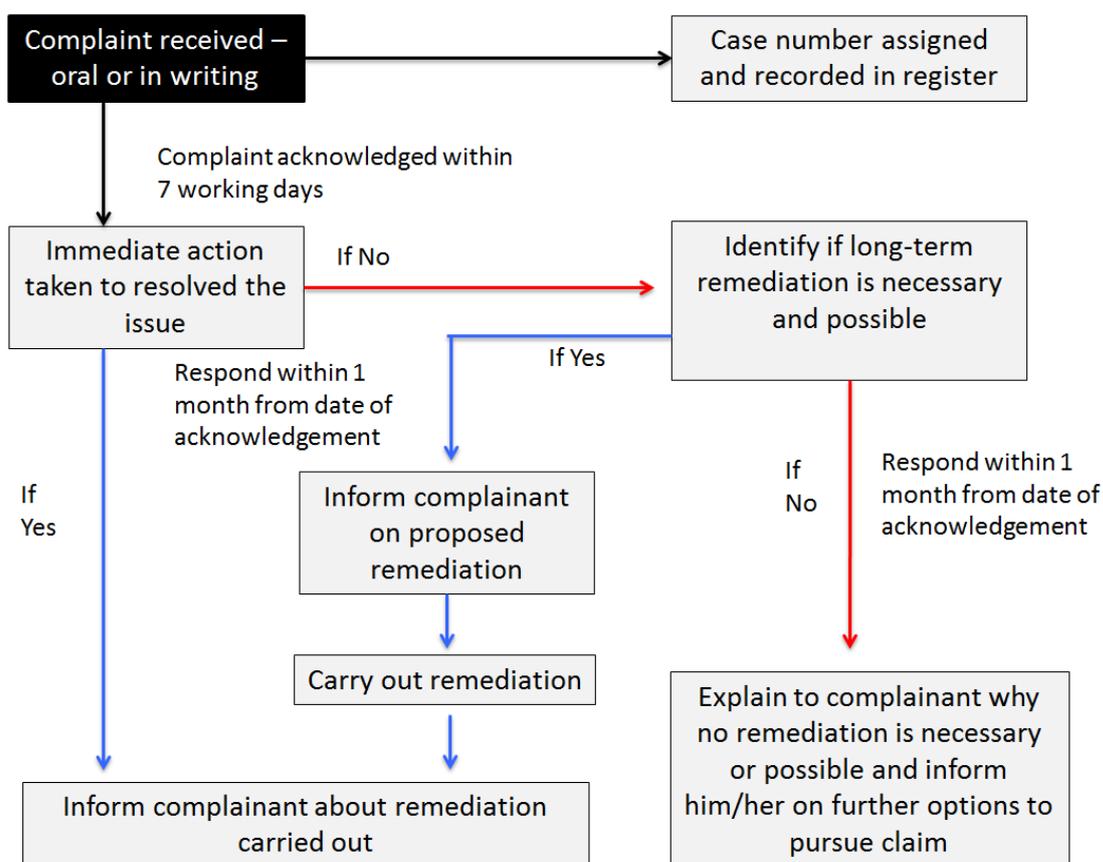


Figure 4 Generic model for handling of complains

## 9 SEP Monitoring

Monitoring is important for the SEP and can be done in different ways. See also EHS monitoring in the ESAP. The Consultant here proposes a continuous monitoring process. The SEP must be a vivid instrument at the hands of the waste company and relevant for what the waste company wants to achieve, hence it must be flexible in order to be strategic.

### 9.1 Internal meetings

It is proposed that responsible managers account for progress every quarter at internal meetings with the City Administration. Meeting formats should be developed, but related to the SEP it could e.g. answer the following questions:

- Who have we communicated with (and about what)?
- Did we get the results we expected with the communication? If No – why not and what can we change? (Consequently adaptation of the SEP will be required). If Yes – how can we show that we achieved the results (gather 'evidence' of results – indicators are, *inter alia*, such evidence).

The yearly progress report should analyse (in general):

- What the project did (activities and budget)
- What the project achieved (results – short and medium term)
- How the context of the project has developed (here an analysis of stakeholders is important and the progress/setbacks related to the SEP).

For the yearly progress report it may be advantageous to have a yearly workshop with a group of representative staff at the waste company, selected stakeholders (e.g. City administration, KMK, and NGOs and customer representatives), to get input to the abovementioned central issues (a range of workshops with different groups during 1-2 days for input as well as for strategic decision making is recommended).

### 9.2 Community satisfaction survey

As part of the monitoring activities, the Consultant also proposes to have a bi-annual community satisfaction survey.

The survey should mainly measure:

- Satisfaction with communication
- Satisfaction with landfill management
- Satisfaction with processes related to R/LRF/RAP

## Annex #1

## CUSTOMER/PUBLIC GRIEVANCE FORM (NOT PAP)

Ajara Reference No:	
Full Name	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: <input type="checkbox"/> _____ _____ _____ <input type="checkbox"/> By _____ Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Georgian <input type="checkbox"/> English <input type="checkbox"/> Russian
Description of Incident or Grievance:                      What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Please return this form to:** Adress to MoFE and/or Hygiena Ltd to be included, together with names of contact person/s, phone number/s, and email address/es.

## Annex # 2

### Contact information to key responsible agencies

Authority	Address	Contact person	Tel/Mail:
Ministry of Finance and Economy of Ajara	#119 Mamia Komakhidze Str. Batumi	David Lomtadze Head of Division International Donor's Relations	+995577456248 lomtadze@mofea.ge
Batumi City Hall	#5 Luka Asatiani str. Batumi	Giorgi Ermakov	
Khelvachauri Municipality	Khelvachauri Settlement; # 21 D. Agmashenebeli str.	Jemal Shavlidze	
Kobuleti Municipality	#141 Agmashenebeli av., Kobuleti	Sulkhan Evgenidze	

### List of local business organizations (potential customers)

Business Organizations	Address	Contact person	Tel/Mail:
<b>Private storage companies</b>			
Batumi Oil Terminal	Batumi, GMT Plaza	Konstantine Megrelishvili, Assistant to director Tiko BazhinoAssistant to Manager	(995 32) 24 18 18 <a href="mailto:konstantin@greenoakholdings.com">konstantin@greenoakholdings.com</a> <a href="mailto:bazhinovat@greenoakholdings.com">bazhinovat@greenoakholdings.com</a>
<b>Hotels (Batumi)</b>			
Intourist	#11 E.Ninoshvili str.	Levan Turmanidze	(88822) 75525 <a href="mailto:info@intouristpalac.com">info@intouristpalac.com</a>
Daviti	#33 N. Baratashvili str.	Merab Qoqoladze	(88822)76530/71718 <a href="mailto:hoteldv@batumi.net">hoteldv@batumi.net</a>
El-bakuri	#121 I.Chavchavadze str.	Amiran Bakuradze	(88822) 76922 bakuriltd@yahoo.com
Tanamgzavri		Murad Turmanidze	<a href="mailto:info@hotelsputnik.com">info@hotelsputnik.com</a>
Marina	#10 Selim Khimshiashvili str.	Temur Lomtadze	(899 136565) sastumromarina@mail.ru
Lotos	#23 Kutaisi str.	Niaz Sharashidze	(88822) 76970
Alik	#12 M.Abashidze	Alik Intskirveli	(88822) 75801 <a href="mailto:alik@gol.ge">alik@gol.ge</a>
Merkuri	#12 I.Chavchavadze str.	Tengiz Mataishvili	<a href="http://www.merkury.ltd.ge">www.merkury.ltd.ge</a>
Metropol	#7/9 N.Imnadze str.	Tengiz Pataraiia	(88822) 76353 899 161815

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Tsereteli	#33 Z. Gorgiladze str.	Memed Tsereteli	(88822) 75873
Batumi Ritsa	#16 Z.Gamsakhurdia str.	Tsitsino Sharadze	(88822) 73292 (855) 789426 <a href="http://www.hotelritsa.com">www.hotelritsa.com</a>
Boni	#4 V. Mayakovski str.	Medea Fagava	(88822) 74820 <a href="mailto:hotelboni@gmail.com">hotelboni@gmail.com</a>
Amirani	#3 G.Mazniashvili str.	Nani Nakashidze	(855) 597469
Astoria	#41 Sherip Khimshiashvili str.	Zurab Pataraiia	(88822) 772557 <a href="mailto:Hotel_astoria@mail.ru">Hotel_astoria@mail.ru</a>
Stambul	#9 Al.Griboedovi str.	Emzar Lortkipanidze	(88822) 33334
Palma	#8 Batumi str.		877 726594
Oasis	#26 Batumi str.	Nugzar Gogitidze	(88822) 71627 <a href="mailto:Mailhotel_oasis@gol.ge">Mailhotel_oasis@gol.ge</a>

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## Annex #3

### National and International Regulations, EBRD Requirements

The Law of Georgia on Environmental Impact Permit determines the complete list of the activities and projects subject to the ecological examination (clause 4 p.1), as well as the legal basis for public consultation in the process of environmental assessment, ecological examination and decision making on issuance of an environmental impact permit.

The 6th clause of the law of Georgia on the Environmental Impact Permit provides detailed requirements and procedures for conducting public consultations and established timeframes for information disclosure and discussion, namely:

According to Article 6, developer is obliged to carry out public consultation of the ESIA before its submission to an administrative body responsible for issuing a permit (in case of activity requiring construction permit before initiating stage 2 procedure for construction permit issuance).

### Georgian national legislative requirements for public consultation

The law of Georgia on Environmental Impact Permit (2008) gives the description of the procedure public consultation/review in the process of ESIA and defines timeline of ESIA for public review and consulting, namely:

4. The project executor will conduct public review on the impact on environment before submittal of the project to the governmental agency responsible for granting permission (in case if activities to be performed require constructional permission, public review must be conducted before starting the second step of the permission obtaining procedures).
5. The project executor will publish the information on the planned activity after the conducting of public review. The information will be published by the administrative territorial office (if any) of the region, where the activity is planned.
6. The announcement must contain the following information:
  - a) goal, title and location of the planned activity;
  - b) location of the agency where the interested parties will be able to familiarize themselves with the documents associated with the activity (including reports on environmental impact);
  - c) the deadline for submittal of considerations;
  - d) place and time for public review.
7. The executor will:
  - a) provide ESIA hard copy and electronic version to the administrative agency, that issues permission in a week after publication;
  - b) accept and consider written notes and considerations provided by citizens in 45 days after the date of evaluation publication;
  - c) conduct public review of the planned activity no later than in 60 days after the publication of the announcement;
  - d) invite corresponding local administration and governmental agencies representatives; the Ministry of the Environmental

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Protection and the Ministry of Economical Development and other responsible administrative agencies to the public review.

8. Reviews will be conducted publicly and any citizen will be able to attend it.
9. Public review will be conducted at the region administrative center, where the activity is planned.

According to the Article 7 of the law, during 5 days after conducting the public disclosure meeting, the minutes of the meeting should be prepared to reflect all the questions and comments raised and explanations, provided by the project proponents in response. Appropriate corrections should be incorporated into the main text of the ESIA, if required. If the comments and proposals of stakeholders are not accepted the letter of explanation should be sent to the authors. The minutes of the meeting, as well as response letters, explanations and corrections should be submitted to the MoE or the administrative body responsible for issuing the Permit as supplementary materials to the ESIA. The mentioned documents should be considered as an essential part of the ESIA.

### **European regulation on public consultation**

Directive 2003/4/EC of the European Parliament and of the Council of 28<sup>th</sup> January 2003 on public access to environmental information specifies the information to be available and disseminated, which includes at least:

- (f) authorizations with a significant impact on the environment and environmental agreements or a reference to the place where such information can be requested or found in the framework of Article 3;
- (g) environmental impact studies and risk assessments concerning the environmental elements referred to in Article 2(1)(a) or a reference to the place where the information can be requested or found in the framework of Article 3.

The Council Directive 96/61/EC of 24<sup>th</sup> September 1996 concerning integrated pollution prevention and control is much more precise on the subject (Article 15 refers to Access to information and public participation in the permit procedure):

1. Without prejudice to Council Directive 90/313/EEC of 7<sup>th</sup> June 1990 on the freedom of access to information on the environment (14), Member States shall take the necessary measures to ensure that applications for permits for new installations or for substantial changes are made available for an appropriate period of time to the public, to enable it to comment on them before the competent authority reaches its decision. That decision, including at least a copy of the permit, and any subsequent updates, must be made available to the public.
2. The results of monitoring of releases as required under the permit conditions referred to in Article 9 and held by the competent authority must be made available to the public.
3. An inventory of the principal emissions and sources responsible shall be published every three years by the Commission on the basis of the data supplied by the Member States. The Commission shall establish the format and particulars needed for the transmission of information in accordance with the procedure laid down in Article 19.

In accordance with the same procedure, the Commission may propose measures to ensure inter-comparability and complementarities between data concerning the inventory of emissions referred to in the first subparagraph and data from other registers and sources of data on emissions.

4. Paragraphs 1, 2 and 3 shall apply subject to the restrictions laid down in Article 3 (2) and (3) of Directive 90/313/EEC.

## The Århus Convention

In April 2000 Georgia ratified Århus convention. This UNECE (United Nations Economic Commission for Europe) convention facilitates and regulates information availability, public society involvement in the decision making in the field of environmental protection. It implements the principle of the need of involvement of all interested parties in order to reach steady development. The convention requires that environmental protection is part of governmental accountability, transparency and responsibility. Social involvement provides for the better projects development and co-governance.

Adopted on 25<sup>th</sup> June 1998 at Århus, Denmark, the "Convention on access to information, public participation in decision-making and access to justice in environmental matters" has been signed or ratified by 40 European countries. It states:

### Article 3 – General Provisions 3

Each Party shall promote environmental education and environmental awareness among the public, especially on how to obtain access to information, to participate in decision-making and to obtain access to justice in environmental matters.

### Article 6 – Public Participation in Decision on Specific Activities

#### 1. Each Party:

(a) Shall apply the provisions of this Article with respect to decisions on whether to permit proposed activities listed in annex I;

(b) Shall, in accordance with its national law, also apply the provisions of this Article to decisions on proposed activities not listed in annex I which may have a significant effect on the environment. To this end, Parties shall determine whether such a proposed activity is subject to these provisions; and

(c) May decide, on a case-by-case basis if so provided under national law, not to apply the provisions of this Article to proposed activities serving national defense purposes, if that Party deems that such application would have an adverse effect on these purposes.

2. The public concerned shall be informed, either by public notice or individually as appropriate, early in an environmental decision-making procedure, and in an adequate, timely and effective manner, inter alia, of:

(a) The proposed activity and the application on which a decision will be taken;

(b) The nature of possible decisions or the draft decision;

(c) The public authority responsible for making the decision;

(d) The envisaged procedure, including, as and when this information can be provided:

(i) The commencement of the procedure;

(ii) The opportunities for the public to participate;

(iii) The time and venue of any envisaged public hearing;

(iv) An indication of the public authority from which relevant information can be obtained and where the relevant information has been deposited for examination by the public;

(v) An indication of the relevant public authority or any other official body to which comments or questions can be submitted and of the time schedule for transmittal of comments or questions; and

(vi) An indication of what environmental information relevant to the proposed activity is available; and

(e) The fact that the activity is subject to a national or transboundary environmental and social impact assessment procedure.

3. The public participation procedures shall include reasonable time-frames for the different phases, allowing sufficient time for informing the public in accordance with paragraph 2 above and for the public to prepare and participate effectively during the environmental decision-making.

4. Each Party shall provide for early public participation, when all options are open and effective public participation can take place.

5. Each Party should, where appropriate, encourage prospective applicants to identify the public concerned, to enter into discussions, and to provide information regarding the objectives of their application before applying for a permit.

6. Each Party shall require the competent public authorities to give the public concerned access for examination, upon request where so required under national law, free of charge and as soon as it becomes available, to all information relevant to the decision-making referred to in this Article that is available at the time of the public participation procedure, without prejudice to the right of Parties to refuse to disclose certain information in accordance with Article 4, paragraphs 3 and 4. The relevant information shall include at least, and without prejudice to the provisions of Article 4:

- (a) A description of the site and the physical and technical characteristics of the proposed activity, including an estimate of the expected residues and emissions;
- (b) A description of the significant effects of the proposed activity on the environment;
- (c) A description of the measures envisaged to prevent and/or reduce the effects, including emissions;
- (d) A non-technical summary of the above;
- (e) An outline of the main alternatives studied by the applicant; and
- (f) In accordance with national legislation, the main reports and advice issued to the public authority at the time when the public concerned shall be informed in accordance with paragraph 2 above.

7. Procedures for public participation shall allow the public to submit, in writing or, as appropriate, at a public hearing or inquiry with the applicant, any comments, information, analyses or opinions that it considers relevant to the proposed activity.

8. Each Party shall ensure that in the decision due account is taken of the outcome of the public participation.

9. Each Party shall ensure that, when the decision has been taken by the public authority, the public is promptly informed of the decision in accordance with the appropriate procedures. Each Party shall make accessible to the public the text of the decision along with the reasons and considerations on which the decision is based.

10. Each Party shall ensure that, when a public authority reconsiders or updates the operating conditions for an activity referred to in paragraph 1, the provisions of paragraphs 2 to 9 of this Article are applied *mutatis mutandis*, and where appropriate.

11. Each Party shall, within the framework of its national law, apply, to the extent feasible and appropriate, provisions of this Article to decisions.

## **EBRD's Public Information Policy Requirements**

Since EBRD is considering financing the project, a short description of EBRD's Environmental and Social Policy as well as EBRD's Public Information Policy requirements is described.

On all projects, the EBRD is committed to providing information, within the requirements of the *Public Information Policy* and the *Environmental and Social Policy*. In particular, for significant "green field" projects and projects involving a major expansion or transformation-conversion, the Bank is committed to meaningful consultation.

Notification for "A" category projects, if there has been no previous notification, the project sponsor will need to provide the potentially affected public and interested non-governmental organisations (NGOs) – hereafter: "the affected public" – with information about the nature of the project for which financing is sought from the EBRD. The way that notification is undertaken will depend on local political, legal and cultural practice. Scoping By means of a scoping process, the project sponsor must ensure identification of all key issues, in particular, by consulting the affected public on the project and taking their comments into account. This scoping process will involve contact by the project sponsor with representatives of the affected public, government agencies, local authorities and other organisations. As part of the scoping process, the project sponsor is required to prepare a draft Public Consultation and Disclosure Plan (draft SEP) describing the public who may be affected by the project, how communication will work throughout the Environmental and Social Impact Assessment process, and what information will be disclosed in relevant languages and by what means (e.g., web site, libraries, etc.) be able to provide comments and recommendations on the SEP as well as the other scoping documents. The EBRD will provide input on draft PDCPs where requested and ensure that the final plan meets the Bank's requirements.

ESIA disclosure Project sponsors must make the ESIA publicly available for comment, in strategic locations including at or near the project site, and where relevant, in the capital or other major cities. ESIA documents, including the executive summary, must be made available in a language which is accessible to the majority of people affected by the proposed project. There may also be other tools used during disclosure, such as fact sheets on issues, prepared to increase understanding of issues in the ESIA. On a case-by-case basis, the EBRD will advise project sponsors regarding the document or group of documents that comprise an ESIA under EBRD requirements. In some cases, this will mean that additional material to the document called an 'ESIA' by the sponsor will need to be released, and in other cases, there may be information that is non-material to the ESIA that may not need to be translated.

Timing of disclosure for public sector projects is a minimum of 120 days between the date that ESIA is made available to the public and the date of EBRD Board of Directors consideration. In practice, a longer disclosure period may be required by the Bank for more complex projects. In all cases, project sponsors are required to keep ESIA-related documentation in the public domain for the duration of the Bank's involvement with the project or at least until project completion. The start of the consultation period will be triggered by the acceptance of the ESIA in the Bank for disclosure in the EBRD's Business Information Centre (BIC) provided that the documents have been released in the region where the project will be located, in EBRD's local office in the region and web-sites of the project sponsor and EBRD.