

Subject: Comments on revised Management Action Plan  
for Paravani HPP complaint

To: Ms. Anoush Begoyan Schliesing

We do not have comments regarding the PCM recommendations but we have some comments regarding responses of the Management, namely,

- Response 1: Unfortunately the proposal of management (Gap analysis) will not solve the problematic issues and vivid example of it is exactly Paravani HPP project, where even English version of ESIA was not available thus we strongly believe that the proposal of the PCM is exactly the proper measure and the board decision must not be made unless additional studies are carried out;
- Response 3: It should be noted the World Bank financed strategic hydropower sector review neither represents an official strategic development plan of Georgia nor the official position of the Government of Georgia, thus taking its findings into consideration by the Management team can not be assessed as adequate measure for making positive decision for the project approval. It should be also noted that Bank is planning to approve Adjaristskali HPP cascade project thus we are wondering what is the justification of this project by the Bank regarding the same issue as this project was not the part of any strategic review documentation.

Regarding other responses of the management, they are proposing to address these issues in the revision of the existing ESP and PIP so we will make other comments on these issues during the revision process of these policies of the EBRD.

Yours faithfully,

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