



**Alchevsk Steel CCGT Facility**

**Environmental Statement**


**Public Consultation and  
Disclosure Plan**

**July 2006**



# Alchevsk Iron and Steel Plant CCGT Facility

## Public Consultation and Disclosure Plan

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## **1. Introduction**

- 1.1 The Industrial Union of Donbass (ISD) proposes to construct a new Combined Cycle Gas Turbine Plant ("CCGT") at the Alchevsk Iron & Steel Works (AMK) in Ukraine. The European Bank for Reconstruction and Development (EBRD) is considering financing the new CCGT. In line with the EBRD's Environmental Policy and Procedures (2003), an Environmental Impact Assessment (EIA) is required, together with requirements for public consultation and disclosure.
- 1.2 This Public Consultation and Disclosure Plan (PCDP) analyses the principal stakeholder groups, identifies channels of communication and describes the approach to public consultation and disclosure will be used in relation to the CCGT project.
- 1.3 The team that prepared the CCGT EIA is aware of and has taken into account the parallel local OVOS (EIA equivalent) commissioned by Alchevsk Steel plant and which is required as part of a statutory feasibility study required under the Ukrainian industrial plant permitting regulations.
- 1.4 This PCDP was initiated in May 2006.

### **PROPOSED DEVELOPMENT**

- 1.5 The Project consists of a 300MWe Combined Cycle Gas Turbine Plant. This plant consists of two units, each comprising a gas turbine, heat recovery steam generator, steam turbine and electricity generator (set on a single shaft). It is currently envisaged that each of the units will discharge waste gases to a separate stack. Industrial water and demineralised water will be supplied to the site from AMK infrastructure which will also be used to dispose of waste water. The plant will provide most of the electrical needs for the AMK site.
- 1.6 The new CCGT plant will be located within the existing steel plant and, after the planned wider modernisation of the steel plant, will utilise process off-gases from the coke ovens, converters, and blast furnaces. Natural gas will not be required for routine operation of the CCGT plant. Steam, needed for the start-up of the unit, would be provided by the neighbouring, existing, AMK Thermal Power Plant, which will reduce from six boilers to one.
- 1.7 The construction of the CCGT is to be initiated in 2007 and is expected to be completed in late 2009.
- 1.8 It should be noted that the CCGT development is just one element of a major and wide ranging environmental improvement programme across the steelworks site as a whole. The intention of these improvements is to provide significant environmental benefits, particularly with respect to air quality.

### **SOCIO ECONOMIC CONTEXT**

- 1.9 Alchevsk is a town of approximately 120,000 people. The town grew up around the single industry, the AMK iron and steel works founded in 1896. AMK employs 27,000

people (~23,000 in AMK and 4,000 in the coke plant). Every third household has someone employed in AMK. All AMK employees belong to the National Metallurgy Union (which has a national membership of 800,000).

- 1.10 AMK is the biggest tax-payer in Luhansk oblast. It contributes over 30% of the regional taxes, and accounts for 65% of the Alchevsk municipal budget (reported by the mayor in the local polis newspaper).
- 1.11 AMK contributes significantly to the town through various educational programmes including support to the technical university, a new orthodox church, and a road repair and resurfacing programme. It runs a clinic for workers and their families, and supports the adjacent 220 bed hospital (financing its capital investment). This investment is particularly important as municipal assets and infrastructure are gradually becoming run down and neither governments nor households are able to invest in their replenishment. Recent evidence of this was seen in the collapse of the municipal heating system in January 2006, causing major suffering and hardship to the population, in particular, vulnerable groups such as the poor and the elderly. AMK was able to provide assistance to repair and replace the boilers.
- 1.12 Residential areas are divided into districts. Each district has a small locally elected committee of four representatives. AMK has one or more representatives on each district committee. District committees meet with residents on a weekly basis enabling residents to report neighbourhood and household concerns. The committee is responsible for resolution of local issues and, or providing additional information according to the request. It is also responsible for monitoring and reporting district issues to the municipal authority.

#### **PUBLIC CONSULTATION AND DISCLOSURE PLAN**

- 1.13 This Public Consultation and Disclosure Plan (PCDP) has been prepared in line with EBRD Environment Department Guidelines and draws on IFC PCD Guidance and the requirements of Ukrainian legislation. The first component of the plan lays out how the Project:

- ◆ identified stakeholders and stakeholder groups with an interest in the proposed development;
- ◆ identified preferred and suitable methods of communication to reach and consult with the various stakeholder groups identified.

The second component examines the process in place or to be put in place to:

- ◆ notify stakeholders of the proposed development;
- ◆ provide details of the potential environmental and social impacts that are currently proposed to be included in the EIA;
- ◆ inform stake holders on how they can access further information, raise concerns, or make comments on the development proposals and the intended scope of the EIA and on the PCDP;
- ◆ ensure that stakeholders' comments are captured and considered in the development of the PCDP, EIA Process;
- ◆ make arrangements for disclosure of the EIA, ensuring it is available for public comment and that all stakeholders can access the document;



- ◆ ensure that comments received during the EIA disclosure period are captured, and provide information to those who made comments and the affected public on how comments have been taken into account;
- ◆ ensure that annual environment and safety monitoring and reporting requirements are met;
- ◆ identify arrangements and programme for public disclosure and consultation during the construction and operational phases.

## **2. Regulations and Requirements**

- 2.1 The Ukrainian EIA legislation and its requirement for public consultation are summarised in the following paragraphs.
- 2.2 An Environmental Impact Assessment (abbreviated to “OVOS” in Russian) and a Public Consultation and Disclosure process form part of the Ukrainian project planning and permitting procedures as set out in the Ukrainian EIA implementation regulation (State Construction Standard DBN A.2.2-1-2003). The OVOS is undertaken as part of a wider project technical/engineering feasibility study (abbreviated to “TEO” in Russian), which is regulated by the State Construction Standard (DBN A.2.2-3-2004).
- 2.3 The OVOS should explain the rationale of the proposed project and assess the environmental effects on the natural, social and built environment. It should also describe possible alternatives, establish the environmental baseline, develop mitigation measures to minimise environmental effects, and ensure the project is compliant with environmental, sanitary and other relevant legislation. The OVOS developers and, or the client organisation must inform the public via the local authorities, in this case the Municipal Administration, about the planned project, organise public hearings, and collect and take account of public comments. This is discussed in section 6 below.
- 2.4 The mandatory OVOS consultation process starts with the disclosure of a “Statement of Intention of Project Implementation” and may be followed by its discussion at initial public hearings (although these are not mandatory). One or more further public hearings is organised when OVOS results are available, together with any public comments collected throughout the process. One deliverable of the OVOS study, the “Statement on Environmental Effects of the Proposed Project”, must be publicly disclosed. A final version of the OVOS incorporating all public comments is submitted for “State Environmental Expertise” (SEE) together with the TEO study. The public are informed about the SEE process in the Statement on Environmental Effects of the Proposed Project.
- 2.5 SEE is carried under the framework Law on Environmental Protection (1991) and the Law on Environmental Expertise (1995) by a multi-disciplinary team of decision-makers, experts and the public. It aims to review and approve the developed project documentation (TEO and OVOS documents). The SEE is usually conducted over a 45 day period. Public involvement in decision making is undertaken throughout the SEE process through the organisation of public hearings, inclusion of public representatives into expert groups, communication via any established help lines or information desks, via the mass media, etc. The results of the SEE are publicly communicated via mass media.
- 2.6 If the SEE concludes that the project documentation is adequate, and that the project will not have damaging environmental effects, the project proceeds to the second planning phase. At this stage the OVOS study will form the basis for specifying the environmental provisions for engineering, procurement and construction, and allow operation and maintenance documents to be elaborated to ensure that the design,

construction and operation of the project will be to an environmentally acceptable manner.

- 2.7 The OVOS report is one the main inputs for project permitting by the competent Ukrainian regulatory authorities. The OVOS approval and licensing process for the Project is undertaken by the Regional Luhanska Oblast authorities of the Ministry of Environmental Resources and the State Sanitary and Epidemiology Service of the Ministry of Public Health.
- 2.8 AMK has appointed Energoproject, a state-owned design, survey and research institute located in Kharkiv, to prepare the TEO study. Energoproject has subcontracted the Kharkiv Institute of Environmental Impact Assessment to undertake the OVOS study as part of the TEO. Atkins acting as consultants on behalf of the EBRD has prepared an independent EIA study, which has been coordinated with the above institutes.

### 3. Review of Previous Public Consultation and Disclosure

- 3.1 Preliminary public consultation has been undertaken by AMK in relation to the CCGT Project. AMK have also undertaken OVOS studies and associated consultation with respect to other current improvement projects at the site, and in general developments at the site (including the CCGT) and these have been widely reported in the local newspapers. At the time of preparation of the initial PCDP (May 2006) the local population appears extremely well informed about developments at the site, as AMK are by far the largest employer and contributor to the local economy and have provided information by a variety of channels.
- 3.2 As part of the OVOS work commenced before this EIA a preliminary meeting was held on 21<sup>st</sup> April 2006 in AMK offices (in the technical library) to inform interested parties about the CCGT project.
- 3.3 Invitations to the meeting were sent to 18 bodies the local authorities and regulatory control units, Donbass University, an environmental NGO, press and a number of Institutes and design units involved in the project. All AMK employees were informed about this first hearing. The original meeting was attended 52 people (see Appendix 1).
- 3.4 Prior to the meeting information was provided through local television programmes and in articles in local newspapers. Information concerning the proposed CCGT Project has been presented in two local newspapers; Za Metal (on 13<sup>th</sup> April 2006) and Put', as well as on the weekend programmes (Saturday evening and Sunday morning) of a local TV station. The information included a description of the purpose of the Project as well as the potential environmental effects that may result from it.
- 3.5 The meeting was described in local press ("Za Metal" of 27<sup>th</sup> April 2006 and "Put'" of 26<sup>th</sup> April 2006) as well as weekend news on the local radio and TV station.
- 3.6 A telephone information desk service was established by the AMK environment department through which additional information could be requested, questions asked and comments made. This was and is available during working hours on Wednesdays. To date no comments or requests for information have been received.
- 3.7 At an early stage in the plan of the wider programme of works (including the CCGT) representatives of the AMK Metallurgy Workers trade union<sup>1</sup> met with the Managing Director. Assurances were given that jobs would be safeguarded and staff retrained and re-deployed as necessary.
- 3.8 AMK issues progress reports on the Project in the press, a recent example is the publication in "Za Metal" of 18<sup>th</sup> May 2006 concerning the signing of contract with Mitsubishi. AMK have made an on-going commitment to produce regular progress reports in a similar manner.

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<sup>1</sup> There is only one union at AMK and all employees are members of this union.

## 4. Stakeholders

### STAKEHOLDER IDENTIFICATION

- 4.1 Stakeholders have been identified through a combination of:
- ◆ discussion with AMK, local regulators and technical institutes;
  - ◆ the invitation and attendance list from the initial OVOS public hearing;
  - ◆ A review of those living and working nearest to the AMK works and the proposed CCGT plant.
- 4.2 The main stakeholder groups and organisations identified are given below. A detailed listing of all identified stakeholders is given in Appendix 2. The key stakeholders are listed below:
- ◆ AMK employees – particularly those working in the existing thermal power plant;
  - ◆ Trade union representatives;
  - ◆ District Committee Representatives of “micro-districts” living adjacent to the plant (Zsilovka, Staryj Gorod, Vasil’evka, Novyj Gorod);
  - ◆ St Nicholas Church on Krasnooktyabrskaya Street;
  - ◆ School No.8 on Kotovskogo Street 12;
  - ◆ AMK Hospital on Gorkogo Street;
  - ◆ Alchevsk Environmental Inspectorate;
  - ◆ Public Health Inspectorate;
  - ◆ Alchevsk Executive Committee (also called the Municipal administration)
- 4.3 Initial meetings were held (4<sup>th</sup>-7<sup>th</sup> April) with State Environmental Inspectorate, AMK management, technical specialists and workers from the power department.
- 4.4 Further small meetings were held on the 5<sup>th</sup> and 6<sup>th</sup> July with representatives of district committees, Father Alexander the church representative, the principal medical officer of the hospital, the school headmistress, the Environmental Inspectorate, Public Health Inspectorate and Trade union representatives.
- 4.5 In meetings, stakeholder representatives felt that they were all aware of the current plans for the CCGT. If they were not fully knowledgeable, they were aware of where to access the information, but had not done so, due to time or other priorities. In one district committee they requested that the AMK newspaper was sent directly to them. It was also agreed that a summary non-technical environment statement will be sent directly to the district committee representatives and local bodies nearest to AMK works.
- 4.6 Generally stakeholders were positive about the CCGT project, expecting environmental improvement. However, various concerns were aired relating to employment, that the extensive social policy of AMK should be maintained and that AMK works might encroach on residential areas.

**STAKEHOLDER COMMUNICATION ROUTES**

- 4.7 The communications and disclosure work undertaken for the EBRD funded EIA will be undertaken jointly with the OVOS communication and disclosure as they refer to the same CCGT project.
- 4.8 A mandatory part of the OVOS consultation process is the disclosure of a “Statement of Intention of Project Implementation”. The notice includes a non-technical summary of the project and the environmental statement. These will be provided by AMK to the municipal administration, along with AMK contact details. Under the Ukrainian system it is the Municipal administration’s responsibility to publicise this through the newspapers. They provide details of: how further information can be acquired, future public meetings, and the two telephone lines and addresses to contact for information or to make comments. One of these telephone lines is AMK Environment dept. (tel. 064 42 93325) the other is the Municipal Administration’s Architect’s office (064 42 35333) open during office hours on a Wednesday.
- 4.9 In addition to this the non-technical summary will also be produced as a short leaflet by AMK Environment department who will distribute it to the district committee representatives and local bodies nearest to AMK works.
- 4.10 As well as public news paper announcements AMK will invite specific groups to the public meeting and have requested the Municipal Administration to formally contact and invite representatives from district committees to the public meeting.
- 4.11 Residents groups are well organised through the district committees<sup>2</sup> which report and raise local issues to the municipal authority and are the main vehicle for effecting any administrative or other changes in the neighbourhood. The committees have weekly meetings or “clinics” with residents. On all town district committees there is one or more AMK representative which improves the flow of information between the district and AMK allowing any questions or issues to be raised directly with the company (Environment Department or the Power Engineers department). The committees help older or less able members of the community with administrative issues and the like and are the first point of call for help if residents are interested to have more information on the project and do not wish to call the help and information lines.
- 4.12 The Trade Union is well organised and has already had meetings with management. Collective bargaining agreements are in place including an agreement that any redundancy must first be agreed by the Union. The Union has direct communications with top management. Agreements have been made that no large scale redundancies will be made as a result of new works. In AMK the Trade Union is organised into more than 500 small separate groups, these are co-ordinated through 59 departmental committees, in turn co-ordinated through a single management committee. Communications follow similar lines and internal briefings and information of meetings is provided to workers through Union meetings, staff notice boards, the AMK weekly newspaper<sup>3</sup> and direct communications between management and staff through departmental and line management routes.

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<sup>2</sup> Under the committee are Street representatives

<sup>3</sup> AMK newspaper is received by all 27000 employees, retired workers and is also on sale in the town.

- 4.13 Ukrainian and Russian are used roughly equally across Ukraine. While the official state language of Ukraine is Ukrainian, and official documents for use at Ministerial level are in Ukrainian the preferred language in most cities of southern, eastern, and northern Ukraine is Russian.
- 4.14 All communications with local stakeholders, employees and at public meetings will be in Russian as this is the predominant language in this region. It is the working language used in schools, newspapers, in AMK, and for most official communications. The OVOS will be produced in Russian although for Ministerial purposes official documents should be in the Ukrainian language<sup>4</sup>.

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<sup>4</sup> General of the Council of Europe in September The Luhansk Oblast Council granted the Russian language regional status in the oblast on April 25 2006. Representatives of local councils were guarded by the European Charter for Regional or Minority Languages ratified by the Ukrainian parliament in 2003 with the submission of the corresponding official document to the Secretary 2005.

ForUm <http://en.for-ua.com/news/2006/04/25/154226.html>  
<http://www.kyivweekly.com/?art=1147208838>

## **5. Disclosure of Information**

5.1 The proposed documents for public disclosure as follows:

- ◆ PCDP;
- ◆ EIA Scoping Report;
- ◆ EIA Non-Technical Summary;
- ◆ EIA full (draft and final) reports;
- ◆ OVOS report and non technical summary.

5.2 The PCDP has been developed in consultation with AMK senior staff responsible for organising and authorising communications and disclosure (including the content of the materials), local stakeholder groups, and the municipal administration responsible for publicising the notice of intention.

5.3 AMK senior staff were involved in stakeholder meetings and the non-technical summary information will be developed considering the key concerns and interests mentioned by stakeholders.



## 6. Public Consultation & Disclosure Programme

6.1 The main methods of consultation and disclosure include:

- ◆ Public notice – Intention of Project Implementation, undertaken by municipal authorities (see 4.8) to include a summary statement on the environmental impact study results;
- ◆ Provision of the summary statement as a separate leaflet to district committees and other key stakeholders in close proximity with AMK. This will be produced and made available at the same time as the non technical statement is made available;
- ◆ The establishment of 2 information and feedback telephone lines, one through AMK the other through the municipal planning authority open on a Wednesday 9am to 5pm until the end of the 60 day consultation period. The contact details are:

Yuri Popov  
AMK Environment department  
4 Shmidt Str, Alchevsk  
tel. 064 42 93844

Architect Office  
Municipal Administration,  
Town Hall (Known as Town Soviet)  
Lenina 48, Alchevsk  
Tel. 064 42 35333

6.2 The full OVOS and EIA documentation will be available at the AMK Environment office and at the Municipal administration offices (town hall) at the address above. The EIA will also be placed on the AMK website. The website address is <http://www.amk.al.lg.ua/>. The document link will be advised at the time the document is placed on the web site through the intention

- ◆ A public meeting to discuss the results of the OVOS and EIA, to be organised by AMK and held two weeks after the Environmental Impact Assessment and non-technical summary are made available to the public. The meeting will be held in the large meeting hall of AMK Technical library which can accommodate approximately 300 people;
- ◆ Invitations to the public meeting by way of the newspapers (in the public notice above), staff announcements and notice boards, AMK newspaper briefing, radio announcement and direct invitation to district committees, regulatory bodies and the media;
- ◆ Minutes of the public meeting will be recorded. Comments received from the meeting and helpline will be collected, and a register of comments will be established by the municipal authorities (Architect department).

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- ◆ Review of all comments through the municipal operational committee, which will include AMK representatives and technical experts. The committee meets monthly;
- ◆ Written responses to those who have made comments with the opportunity to follow this by meeting with the municipal decision making body. Responses to comments will be made within a 10 day period of their receipt, or soon after the committee has met. This is in line with Ukrainian regulations.
- ◆ A summary of all comments and actions resulting or otherwise from the consultation to be made available on the AMK web or from the Environmental Department on request.

6.3 Table 1 below lists the planned methods of disclosure.

**Table 1 Summary of stakeholder disclosure routes**

Date	Completed 21-28 April	Ongoing	Planned for 3rd week July	w/c24/07 or w/c 31/07	60 Day Period	10 Days after consultation period
Disclosure Plan	Project announced/initial information	Feedback and information requests	Draft EIA made available to stakeholders	Information provision on EIA	Feedback by Stakeholders	Response to stakeholder concerns
Alchevsk Region Environmental Inspectorate;	Invitation to public meeting	Information help line	Electronic copy to be sent, hard copy on request.	Public meeting	At public meeting, in writing, or in small feedback meeting if requested by authority	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter, or by meeting.
Public Health Inspectorate (Sanitary-Epidemiologic Authority);	invitation to public meeting	information help line	Electronic copy to be sent, hard copy on request	Public meeting	At public meeting, in writing, or in small feedback meeting if requested by authority	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
AMK employees (including trade union representation);	internal meetings and notices	information help line	Hard copy available in AMK. Announced by notices, internal communication.	Public meeting, small meeting on request	At public meeting, in writing or by information phone line. Union meeting with management if requested	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter.
School No.8 on Kotovskogo Street 12;	Newspaper announcement	information help line	Summary statement in newspapers. More information on request or by help line.	Public meeting, small meeting on request	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
AMK Hospital on Gorkogo Street;	Newspaper announcement	information help line	Summary statement in newspapers. More information on request or by help line.	Public meeting, small meeting on request	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter

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Alchevsk Executive Committee;	invitation to public meeting	information help line	Summary statement in newspapers. More information on request or by help line.	Public meeting	At public meeting, in writing, or in small feedback meeting if requested by authority	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
Committee representatives of "micro-districts" living adjacent to the plant (Zsilovka, Staryj Gorod, Vasil'evka, Novyj Gorod);	Newspaper announcement	information help line	Hard copy in town hall &AMK. Summary statement in newspapers including access details and sent as a leaflet. More information on request or by help line.	Public meeting, small meeting on request	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
Local Businesses	Newspaper announcement	information help line	Hard copy in town hall &AMK. Summary statement in newspapers including access details. More information on request or by help line.	Public meeting	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
St Nicholas Church on Krasnooktyabrskaya Street;	Newspaper announcement	information help line	Hard copy in town hall &AMK. Summary statement in newspapers including access details. More information on request or by help line.	Public meeting, small meeting on request	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
Local TV station 'Asket';	Request to place information and information to meeting	information help line	media information by town planning dept. and AMK leaflet.	Public meeting		
Editorship of the newspaper 'Ogni';	Request to place information and information to meeting	informal /work related channels	Media information by town planning dept. . and AMK leaflet.	Public meeting		
Editorship of the newspaper 'RIO-plus';	Request to place information and information to meeting	informal /work related channels	Media information by town planning dept. . and AMK leaflet.	Public meeting		
Residents in other areas of town	Newspaper announcement	information help line	Hard copy in town hall &AMK. Summary statement in newspapers including access details. More information on request or by help line.	Public meeting	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter

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Institute of Environmental and Energy Savings Problems;	invitation to public meeting	informal /work related channels	Hard copy in town hall &AMK. Summary statement in newspapers including access details. More information on request or by help line.	Public meeting	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
Kharkiv Design, Survey and Research Institute Energoprojekt;	invitation to public meeting	informal /work related channels	Hard copy in AMK. Electronic version on request.	Public meeting	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
Kharkiv Scientific-Research Institute on Environmental Impact Assessment 'UkrNIINTIZ';	invitation to public meeting	informal /work related channels	Hard copy in AMK. Electronic version on request.	Public meeting	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
AMK office of Scientific-Research Institute 'Giprostal';	invitation to public meeting	informal /work related channels	Hard copy in AMK. Electronic version on request.	Public meeting	At public meeting(s) In writing or by phone information line	Compilation & review by planning dept. AMK & experts of all comments. Action to be taken reported by letter
Editorship of the AMK newspaper 'Za Metal';	invitation to public meeting and media information	informal /work related channels	media information by town planning dept. and additional articles by AMK staff.	Public meeting		

- 6.4 Comments actioned through the review committee will be fed back into the TEO process to improve mitigation measures within the Project design. These additional mitigation measures will also be incorporated within the EIA findings.
- 6.5 AMK will issue regular progress reports via the local media during Project construction. The AMK telephone helpline will be re-instigated during the construction phase to record complaints during construction. See section 8, Grievance Mechanism.
- 6.6 AMK liaison with local residents or stakeholder groups during the construction and operation phases will be undertaken through the district committees and their representative, in particular, but not only, the AMK representative. AMK staff meetings take place periodically to provide information to staff and AMK representatives on the progress of works and their operation. Updates are given in the AMK newspaper. AMK representatives work with other committee representatives who listen, record and discuss resident's problems and how they should be resolved. Staff can take up problems directly with the power department. Representatives are trained "on the job" by other more experienced committee representatives.

- 6.7 The existing plant complaints procedures will be used to record comments or complaints during the operational phase of the plant. Staff can register concerns and issues through their line management, the union or direct with the Environment Department. Alternatively they use the route via the district committee.

## 7. Resources and Responsibilities

- 7.1 The key bodies responsible for this process are AMK, the Municipal Administration under the office of the Chief of Environmental Health and Safety, and the Architect Department. Responsibilities are identified in Table 2.

**Table 2 Responsibility for PCDP Activities**

	<b>Activity</b>	<b>Responsible</b>
1	Provision of information for Notice of Intention	Head of Environmental Department, AMK and Office of the Chief Power Engineer, AMK
2	Placing Notice of intention and media information	the Municipal Administration under the office of the Chief of Environmental Health and Safety
3	Provision of full OVOS & EIA information public copies in Town hall, AMK offices, and EIA on web site, and distribution of e-mail copies as needed, and placement on web, production and distribution of summary statement as a leaflet.	Head of Environmental Department, AMK and Office of the Chief Power Engineer, AMK
4	Establishment of information telephone line	the Municipal Administration, Architect office and Environment Department, AMK
5	Co-ordination of comments	the Municipal Administration, Architect office
6	Organisation of public meeting	Environment Department, AMK, and Office of the Chief Power Engineer, AMK
7	Publicising time/place of meeting in addition to 1)	Environment Department, AMK, and Office of the Chief Power Engineer, AMK
8	Materials and content of meeting	Environment Department, and Office of the Chief Power Engineer, AMK in consultation with Kharkiv Design, Survey and Research Institute Energoprojekt project design consultants for OVOS, and Atkins consultants for EIA
9	Review of comments and response to comments	the Municipal Administration, (Executive committee) in consultation with AMK and experts
10	Incorporation of comments through measures into project plan /design , EIA and OVOS	AMK management and Kharkiv Design, Survey and Research Institute Energoprojekt project design consultants and Atkins.
11	Information to public on changes to project, EIA and OVOS	Head of Environmental department, AMK and Office of the Chief Power Engineer, AMK

7.2 The contact details for the main parties responsible are given below:

The Municipal Administration contact is:

Victor Bogach,  
Head of Labour Safety and Environment  
Town Hall locally called Town Soviet  
+38 06442 353 33

The AMK staff contacts are:

Yuri Popov  
Environmental Manager, AMK  
+38 06442 938 44

Nickolaj Antonov  
Health & Safety Manager AMK  
+38 06442 933 25  
Email care of: [dikovich@amk.lg.ua](mailto:dikovich@amk.lg.ua)

The Atkins contact is:

Olena Popovych – Ukraine Liaison Officer  
Atkins Limited  
Water & Environment  
Sir William Atkins House  
Ashley Avenue, Epsom, Surrey, KT18 5AL, England  
[olena.popovych@atkinsglobal.com](mailto:olena.popovych@atkinsglobal.com)  
Tel: +44 (0) 1372 756214  
Fax: +44 (0) 1372 756888

- 7.3 The Environment department has a staff of 16, they are responsible for internal environmental monitoring, control and liaison with AMK operational departments. They are also responsible for the management of the AMK environmental regulatory process and liaison with the external Environmental Inspectorate.
- 7.4 The head of the Environment Department and Office of the Chief Power Engineer work together with an assistant to implement the PCDP. Existing and established lines of communication make the distribution of information through trade union communication channels, staff departmental reporting lines, AMK district committee representatives and the AMK weekly newspaper less onerous and resource demanding.
- 7.5 The municipal authorities have an office and staff specifically responsible and experienced in planning approval and for planning communications (i.e. standard information requirements, standard information provision for newspaper coverage, procedures for telephone information line comment registration and recording and so on). They have established and regular communications with district committees and with local regulatory bodies.

## 8. Grievance Mechanism

8.1 The formal grievance mechanism is presented in Table 3.

**Table 3 Grievance Mechanism**

Action or Activity	Method	Details
<b>During 60 day EIA and OVOS consultation period</b>		
1	Comments made	Comments in writing or by telephone can be made to AMK or Municipal Administration. These can be made by an individual or by the district committee
2	Comments Registered	Yuri Popov, AMK Environment Dept. 4 Shmidt Str, Alchevsk, Tel 064 42 93844 Architects office, Town Soviet, Lenina 48, Alchevsk, Tel. 064 42 35333
3	Comments Reviewed	Both AMK and Municipal Administration register comments manually noting name of sender, contact details, date received, date of reply and reference number. Letters are filed, telephone messages are transcribed and filed by reference number.
4	Response to comments	Municipal administration collates all comments (to AMK and to the municipality). These are reviewed by the Executive council and members of AMK at regular monthly meetings. Actions as a result of the review process are fed back to the power engineer who actions as required
5	Collation of comments and publication	Responsibility of Architects office to organise comments and additional AMK and specialists to join Executive committee review.
		Responsibility of Architects office
		Responsibility of Architects office
		Yuri Popov, AMK Environment Dept. 4 Shmidt Str, Alchevsk, Tel 064 42 93844
		At the end of the consultation period AMK, Yuri Popov is responsible to summarise all comments received and the outcome of these actions. The summary will be available from AMK Environment Dept.



6	Monitoring and checking the process	Monitoring of registers, review meetings, response replies and feed back to AMK power manager.	Monitored by Nickolaj Antonov Manager of Health & Safety and Environment Depts. AMK Tel. +38 06442 933 25 or e-mail care of: dikovich@amk.lg.ua and by Victor Bogach, Head of Labour Safety and Environment, Town Soviet. +38 06442 353 33
<b>Construction and Implementation</b>			
7	Comments made	Comments in writing or by telephone can be made to AMK. These can be made by an individual or by the district committee. A grievance form is provided in Appendix 3 and can be requested from Nickolaj Antonov.	Yuri Popov, AMK Environment Dept. 4 Shmidt Str, Alchevsk, Tel 064 42 93844 or to Deputy Power Engineer, Igor Fokin, 4 Shmidt Str, Alchevsk Tel 064 42 93332 Nickolaj Antonov Manager of Health & Safety and Environment Depts. AMK Tel. +38 06442 933 25 or e-mail care of: dikovich@amk.lg.ua
8	Comments Registered	Both AMK offices register comments manually noting name of sender, contact details, date received, date of reply and reference number.  Letters are filed; telephone messages are transcribed and filed by reference number.	
9	Comments Reviewed	Comments are reviewed by senior management of dept. of power engineer. They discuss issues with key staff or specialists as necessary.	Responsibility of Deputy Power Engineer, Igor Fokin, 4 Shmidt Str, Alchevsk Tel 064 42 93332
10	Response to comments	A written response is sent to all comments within 10 days of receipt informing of the outcome of the review.	Responsibility of Deputy Power Engineer, Igor Fokin, 4 Shmidt Str, Alchevsk Tel 064 42 93332

8.2 Due to the nature of the process above, if confidentiality is to be effectively maintained, comments and complaints should be made through the district committee.

8.3 AMK employees may pursue matters through company communication lines or through the trade union or as residents can use the above means. If pursuing the matter through company communication lines, the employee can request a meeting with his line manager or can provide the line manager with a written comment or complaint using the grievance form available from Nickolaj Antonov Manager of Health & Safety and Environment Depts. AMK (see Appendix 3). This will be taken forward to departmental committee and discussed with the relevant parties as required. If this is not resolved in a satisfactory manner the employee may prefer to

take the matter further through the Trade union, and should provide a written letter in the first instance to the trade union committee, who will review the matter and send a formal letter to the Managing Director. The grievance mechanism undertaken by the Union is set out in formal terms agreed by AMK and the Union and is available in the terms of the collective agreement.

## **9. Reporting**

- 9.1 In accordance with EBRD policy and requirements the EIA will be made publicly available on AMK web site once it has been accepted as fit for purpose by the Bank. The EBRD will provide a link to the AMK website. This is expected to take place in mid July. The EIA will remain in the public domain throughout the life of the project.
- 9.2 The results of the public consultation will be summarised and made available on the AKM web site, published in the AMK newspaper or on request from the Environment Department. AMK employees who serve on local committees will be asked to inform their residents' committee of the outcome and remind them of the appropriate ways to comment.
- 9.3 The EIA will be updated in line with the comments received and the findings of the operational committee responsible for their review. The outcomes will be incorporated in project planning and design by the AMK Power Station and the EIA and OVOS will be updated to reflect this. Regular progress reports will be provided by local newspapers including the AMK newspaper, and if local residents wish this can be made an agenda item for information from the AMK representative.
- 9.4 Environmental and safety monitoring is undertaken as a routine activity and information is held with the Environmental Department and Health and safety Department managers. Information is routinely available on accidents, absenteeism, illness (cases and duration) and levels of environmental emissions. These are developed to meet the reporting requirements of the Environmental Inspectorate and AMK will review them in line with the Environmental Performance Indicators shown in the Global Reporting Initiative Mining and Metals supplement. Reports are regularly made to senior management and a short annual statement or report can be provided to the EBRD.



## **Appendices**



## APPENDIX 1

**Attendees of initial CCBT project Briefing Meeting of 21 April 2006**

<b>Organisation, contacts, address</b>
1. OJSC AMK
2. Institute of Environmental and Energy Savings Problems,
3. AMK Department of Environmental Protection
4. AMK Department of Chief Power Engineer,
5. Kharkiv Scientific-Research Institute on Environmental Impact Assessment 'UkrNIINTIZ',
6. AMK office of Scientific-Research Institute 'Giprostal',
7. AMK Trade Union,
8. AMK Design Department
9. Editorship of the AMK newspaper 'Za Metal',
10. Editorship of the newspaper 'RIO-plus',
11. Editorship of the newspaper 'Ogni',
12. Local TV station 'Asket', tel: 3-21-62, Lenina 55, Alchevsk
13. Local Sanitary-Epidemiologic Authority, tel: 2-23-02, Chapaeva 158, Alchevsk
14. Alchevsk Executive Committee, tel: 3-53-33, Lenina 44
15. Alchevsk Coke-Chemical Plant, tel: 7-62-85, Krasnykh Partizan 2
16. Alchevsk Region Environmental Authority,
17. Donbass University – DonGTU,
18. Green Party 'Eko-25',





## Stakeholders and main interests

Sector	Organisation/ representative	Interest	Influence	Interest /concerns
Regulator	Alchevsk Environmental Inspectorate	1	2	Environmental regulatory process and standard setting and enforcement
Regulator	Lugansk Oblask Environmental Inspectorate	1	1	Environmental regulatory process and standard setting and enforcement
Regulator	Local Public Health Inspectorate;	1	2	Health issues
Regulator	Ministry for Public Health	1	1	Health implications
Employee	AMK employees (including trade union representation);	1	2	Employment changes, wage changes, worker welfare
Services	School No.8 on Kotovskogo Street 12;	1	4	Changes in environmental conditions re noise, air quality implications for health.
Services	AMK Hospital on Gorkogo Street;	1	4	Changes in environmental conditions & implications for health. Changes in worker numbers and implications for admissions and new capital investment needs
Regulator	Alchevsk Executive Committee;	1	2	Economic prospects employment and implications for local budget and possible future extension of power supply
Resident	Representatives of "mico-districts" living adjacent to the plant (Zsilovka, Staryj Gorod, Vasil'evka, Novyj Gorod);	2	3	Positive views re changes in environmental conditions. Interest to ensure standards not exceeded. Concern if new works should require additional residential land.
Resident	Businesses	2	3	Keen AMK maintains employment and social policies to maintain local incomes & demand.
Services	St Nicholas Church on Krasnooktyabrskaya Street;	2	3	Employment and social policy should be maintained
media	Local TV station 'Asket';	2	3	Reporting news and viewer information and interest
media	Editorship of the newspaper 'Ogni';	2	3	Reporting news and reader information and interest
media	Editorship of the newspaper 'RIO-plus';	2	3	Reporting news and reader information and interest
Resident	Residents in other areas of town	2	3	Job opportunity changes, air quality long term future of firm and company social policy implications
R&D inst.	Institute of Environmental and Energy Savings Problems;	2	3	New technologies, current project involvement and potential for future consultancy
R&D inst.	Kharkiv Design, Survey and Research Institute Energoprojekt;	2	3	New technologies, current project involvement and potential for future consultancy
R&D inst.	Kharkiv Scientific-Research Institute on Environmental Impact Assessment 'UkrNIINTIZ';	2	3	New technologies, current project involvement and potential for future consultancy
R&D inst.	AMK office of Scientific-Research Institute 'Giprostal';	2	3	New technologies, current project involvement and potential for future consultancy
media	Editorship of the AMK newspaper 'Za Metal';	2	4	Reporting news and viewer information and interest

*Public Consultation and Disclosure Plan*

Regulator	Committee on Public Rights Protection;	3	3	Ensure residents, workers rights upheld and correct process followed.
NGO	Alchevsk City Women’s Organisation;	3	4	Group supporting and encouraging participation and assisting with facilitation
Services	Alchevsk Red Cross;	3	4	Health issues
Services	Donbass University, DonGTU, (students/professors):	3	4	Future job opportunities and skill required, update course info /training
NGO	ECO-25 (local branch of Ukraine Green Party);	4	4	General environmental interest
NGO	Alchevsk office of Crimea Association on Bio-energy-information Natural Cycle;	4	4	Not very active and limited interest
NGO	Alchevsk Youth Council;	4	3	Future employment and long term viability of AMK and future AMK social policy
NGO	Alchevsk City Youth Public Organisaatuion ‘Vzor’;	4	3	Future employment and long term viability of AMK and future AMK social policy
NGO	Alchevsk City Public Organisation ‘Union of Youth of Ukraine’s Regions’;	4	3	Future employment and long term viability of AMK and future AMK social policy
NGO	Centre of NGO Development and Support.	4	4	Assistance as required

**APPENDIX 3**

**Alchevsk Public Grievance Form**

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

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

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

**Please return this form to:** Nickolaj Antonov, Health and Safety Manager, AMK,  
 Address \_\_\_\_\_: Tel.: 06442-933-25 or E-mail:  
[dikovich@amk.lg.ua](mailto:dikovich@amk.lg.ua) .

If you are a resident of Alchevsk, you may also ask your local residential committee representative to submit the form on your behalf.