

Stakeholder Engagement Plan

Senj Sant LLC

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1 Introduction

1.1 BACKGROUND

The document is the Stakeholder Engagement Plan (SEP) of Senj Sant LLC, for the development of the Moncement cement plant, quarry and associated infrastructure development, in Urgun Soum, Dornogobi Province, Mongolia. This plan presents the specific stakeholder engagement activities that Senj Sant will undertake in relation to realisation of the project.

1.2 OBJECTIVES OF THE PLAN

The overall objective of the Stakeholder Engagement Plan (SEP) is to define a stakeholder engagement, public information disclosure and consultation process for Senj Sant LLC. This SEP highlights the way the company plans to communicate with people and stakeholder groups who may be affected by or interested in Senj Sant LLC's operations and activities. The end goal is to build a trusting relationship with the host community and other interested stakeholders based on a transparent and timely supply of information and open dialog. The SEP and the process defined therein are therefore a means to this end. It also includes a grievance mechanism for stakeholders and the public to raise any concerns, provide feedback and comments about the company's operations and how those complaints/comments will be handled.

1.3 SCOPE OF THE PLAN

This SEP focuses only on the construction and operation of a cement plant, a quarry and associated infrastructure including the conveyor, railway, extension roads, and overhead power lines, in Urgun Soum, Dornogobi Province, Mongolia.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that the company will adopt and those which will be used for major investment programmes.

The SEP will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date and shared with project stakeholders.

1.4 CONTENTS

This document includes the following:

- Chapter 2 – Project descriptions and key environmental and social issues;
- Chapter 3 – Public consultations and information disclosure requirements;
- Chapter 4 – Identification of stakeholders and other affected parties;
- Chapter 5 – Overview of previous stakeholder engagement activities carried out by Senj Sant LLC;
- Chapter 6 – Stakeholder engagement programme and methods of engagement and resources; and
- Chapter 7 – Grievance mechanism.

2 Project Description

2.1 OVERVIEW OF THE COMPANY

Senj Sant LLC is a Mongolian project company currently owned by Monpolymet co Ltd, which was established with a purpose of building a technologically advanced and environmentally sound cement plant utilising the vast limestone resource located in Urgun Soum, which is owned by Senj Sant LLC.

Lafarge, a world leader in building materials, will be a technical partner on the project under a technical consultancy agreement and it will also provide operation and maintenance services after the successful commencement of the project. Lafarge believes that ongoing advances in building materials must integrate respect for people, their different needs and their environment. This strong conviction is reflected in a strategy which combines industrial know-how with:

- performance,
- value creation,
- respect for employees and local cultures,
- environmental protection,
- conservation of natural resources and energy.

2.2 PROJECT SETTING

There are four main elements to the proposed development, which include the open-cast quarry site, the cement plant, a long belt conveyor linking the two and the associated infrastructure. Fencing will be used to designate and protect certain sites. Descriptions of these sites are provided:

Quarry site

The total licensed area of the quarry site equates to 484 hectares and is located approximately 3km to the east of Urgun Soum. The limestone resource is located at the surface which will limit the amount of overburden produced as a result of operations.



Figure 1: Quarry site area / limestone outcrop

Long belt conveyor

Ground limestone from crushing plant will be transported to the cement plant by a long belt conveyor. The conveyor will be approximately 0.84 km in length and will primarily be at ground level although it will be raised in certain sections to cross natural undulations in topography.

Designated crossing points over the conveyor will be provided.

Cement plant site

The cement plant site is approximately 33ha in size. Operations will include the cement processing plant (including crushers, mills, clinker production, cement kiln etc), administrative and service centre, repair shop and garage, power and steam supply facilities, storage warehouses and associated infrastructure.

During construction a migrant workforce will be used, comprising approximately 650 foreign workers. They will be housed in a self-contained accommodation compound and interaction between the camp and village will be managed / regulated. At the time of writing the exact location of the construction compound is not known although it is understood that the location of the compound will be agreed with the Urgan Soum councillor representatives.

During the operational phase, the cement plant is expected to employ approximately 320 people, with sections of the cement plant being operational 24hrs a day for 328 days per year. All employees will live in purpose built workers accommodation approximately 500m to the north of the cement plant site.



Figure 2: Typical cement plant

Associated Infrastructure - A 53.3km (110Kv) overhead electricity power line will be constructed from Sainshand to the site. The route generally follows the line of the existing overhead power lines that connect Urgan Soum to main electricity grid in Sainshand. In addition an access road to the quarry, a water supply pipeline of circa 10km and a railway spur from the main railway line to the cement plant site will be constructed.

2.3 INVESTMENT PLAN SUMMARY

The investment will help fund the development of a cement facility with an initial capacity of 1,867 tonnes per day, with a future plan to increase this to 3,735 tonnes per day (although the second phase has not been considered in detail as part of this assessment). The plant is proposed to be commissioned in 2014, with a second phase of development, including a further cement manufacturing line intended to be developed in 2016.

The plant design is based on the on line concept with a production capacity of 1,867 tons per / day, approximately 612,376 tons of cement / year based on 328 operational days per year.

The investment will help fund the four main elements of the project the cement plant, a quarry and associated infrastructure.

3 Regulatory and Policy Framework

Stakeholder consultations and information disclosure undertaken by Sanj Sent LLC will comply with the requirements of the legislation of Mongolia and best international practice, as described in the requirements of the European Bank for Reconstruction and Development (EBRD) and Performance Requirements engagement is an essential requirement of PR 10: *Information Disclosure and Stakeholder Engagement*.

Information on the EBRD's Environmental and Social Policy can be found on: http://www.ebrd.com/downloads/about/sustainability/ESP_PR01_Eng.pdf (English)

<http://www.ebrd.com/downloads/about/sustainability/2008policym.pdf> (Mongolian)

The Mongolian Environmental Impact Assessment Procedures (1998, revised 2010)

Environmental Impact Assessments (EIAs) allow incorporation of environmental concerns into developmental planning. This process informs the relevant authorities and stakeholders of potential environmental impacts both positive and negative. The proposed Urgan limestone mining project requires updating of Mongolian EIA performed by a registered, licensed consulting firm as there are some changes in the mining plan and mine operations would require an EIA and last assessment was conducted in 2008. The EIA Law in Mongolia requires the opinion of local residents of the area to be addressed in undertaking and preparing an Environmental Impact Assessment. There is no specific requirement under EIA law to demonstrate how the opinions of local residents should be reflected in design or operational aspects.

Best International Practice

Best International Practice is based on the fundamental principles that information provision on projects is a right of local communities, and that stakeholder engagement needs to continue throughout the life of projects. As noted above, this SEP only focuses on the construction and early operational phases. Revised plans will be prepared as the operational phase progresses

The key operational principles of effective engagement for projects are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and

-
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

These principles have been adopted by Senj Sant LLC.

General Stakeholder Communication Records Maintenance

Communication records will be maintained by the Project Management department at Senj Sant LLC, specifically through the Community Liaison Manager. Key information will be clearly communicated to stakeholders and also the key incoming communications (i.e. general questions, complaints, etc.) will also be maintained including a summary of actions to be taken.

As part of this communications procedure, the Project Manager at Senj Sant LLC will record and update these ongoing stakeholder engagement activities on an ongoing basis.

4 Stakeholder Identification

4.1 IDENTIFICATION OF MAIN STAKEHOLDERS

Overview

This section of the document identifies interested parties i.e. stakeholders and others affected at a local, district and regional level. Stakeholders could also be individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views.

Stakeholders have been identified within the following groups:

- International.
- Government (authorities at state / regional levels).
- Government (Aimag, Soum and Bag)
- Advisory non-government.
- Services / suppliers.
- Clients.
- Institutions (universities, think tanks, etc.).
- The construction sector.
- Citizens Representative Body – ‘Khuraal’
- Political parties
- Internal stakeholders (Employees).
- General communities.
- Public groups - nearby hospital, local schools, institutions of national heritage.
- Specifically identified companies
- The media.

All the stakeholders identified are presented in Table 2 below.

If you are not on the list and would like to be kept informed about the project, please contact:

Ms. Khaliun Tserenpil
Project Assistant
Email: khaliun@monpolymet.mn
Telephone: 99220792

Table 2: Stakeholders and Other Key Affected Parties

Stakeholder Groups	Key Stakeholders	Summary of Specific Interests
<i>Government (National)</i>	<p>Ministry for Mining</p> <p>Ministry of Nature, Environment and Green Development. (including National Agency of Meteorology, Hydrology and Environmental Monitoring; Water Authority)</p> <p>Ministry of Industry and Agriculture</p> <p>Ministry of Health</p> <p>Ministry of Construction and Urban Development (Administration of Land Affairs, Geodesy and Cartography)</p> <p>Minister for Road and Transportation (including State Railway Authority; Department of Road Transportation;)</p> <p>Ministry of Justice (Office of Immigration, Naturalization and Foreign Citizens)</p> <p>Ministry of Education and Science</p> <p>State Agency of Professional Inspection including:</p>	<p><i>National mineral exploitation policy and issue of licences for mineral exploitation</i></p> <p><i>Land rehabilitation</i></p> <p><i>National environmental and water policies. Oversight of monitoring and enforcement</i></p> <p><i>Functions:</i></p> <p><i>Protection of employee and public safety</i></p> <p><i>Land-related issues</i></p> <p><i>Transport related issues</i></p> <p><i>Regulation foreign workers</i></p> <p><i>Cultural heritage protection</i></p> <p><i>Oversight of monitoring and enforcement</i></p>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interests
	<ul style="list-style-type: none"> • Department of Environment, Tourism, Geology and Mining Inspection; and • Department of Construction and Infrastructure Inspection etc. 	<i>functions</i>
<p><i>Government (Aimag, Soum and Bag)</i></p> <p><i>legislative and executive 'branches at all levels</i></p> <p><i>Legislative 'branch' = Citizens Representative Body – 'Khuraal'</i></p>	<p><i>Dornogobi Aimag</i></p> <p><i>Urgun Soum</i></p> <p><i>Inspection departments in Aimag and an environmental inspector in Urgun Soum</i></p> <p><i>Senj Bag</i></p> <p><i>Sumyin Bulag Bag</i></p> <p><i>Sumber Bag</i></p> <p><i>Bayanmunkh Bag</i></p>	<p><i>Permitting and statistical reporting for natural resource managements</i></p> <p><i>Establishing various kinds of protection zones (e.g. water protection zones)</i></p> <p><i>Determine annual limits on the use of natural Resources (Aimag and Soum)</i></p> <p><i>Negotiating land use and land possession contracts (Aimag and Soum)</i></p> <p><i>Implementation of EIA-related management actions is supervised by the Aimag. Soum and Bag governors and 'khuraals' and checked/enforced by the Inspectorate</i></p> <p><i>Socio-economic development</i></p>
<p><i>Non-Governmental Organisations/Associations</i></p>	<p><i>Dornogobi Aimag Chamber of commerce/Association of entrepreneurs</i></p> <p><i>Informal Herders Groups (Soum and Bag levels)Soum Association of Pasture</i></p>	<p><i>Business development opportunities</i></p> <p><i>Land acquisition:</i></p>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interests
	Users Groups – Individual Pasture User Groups at Bag level Others that may be identified by Senj Sant LLC in collaboration with the Soum Authority	<ul style="list-style-type: none"> • <i>Pasture use</i> • <i>Grazing pressure/intensity</i> • <i>Access to water</i> • <i>Severance of livestock routes paths between grazing and water</i>
<i>Operational suppliers, clients and client representation</i>	National and local specialist consulting and contracting companies Ulaanbaatar Railway JSC Mongolian National Power Transmission Grid Company Village well provision and maintenance company: Chandman Ilch LLC <i>Office headquarter: Sainshand</i>	<i>Business opportunities, price, payment terms .</i> Railway use and safety management. Electricity supply and safety management. Ongoing provision of clean water to the village.
<i>Internal stakeholders (Employees, labour unions)</i>	Directly –employed workforce and contractor employees	<i>Retrenchment, training, y health and safety, migrant workers etc</i>
<i>Political parties</i>	Leaders of key political parties represented in <i>Aimag</i> and <i>Soum</i> ‘ <i>khuraals</i> ’	<i>Economic and social development; equity issues</i>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interests
<i>Communities¹</i>	Elected representatives / community ‘leaders’ Local Residents Specific Families: <ul style="list-style-type: none"> - Family located in the Ger adjacent to the Senjit Khudag well - Herder families located near to the Shuvuun Huuvur Spring 	<i>Environmental quality, land acquisition and compensation,, construction traffic</i> <i>Jobs and other economic benefits</i> <i>Social/community investment opportunities/initiatives</i>
<i>Companies</i>	MongolRosTsvetmet (feldspar mine) Yalguun International (small lime mine) Yalguun Mill (manufacturing ‘mastic’ from lime) Shudyet Od (small feldspar mine) Chandman Ilch (district heating and water supply company)	<i>Business opportunities</i> <i>Potential Impacts on their operations</i> <i>Cumulative impacts</i>

¹ A community consists of interacting individuals, groups and households who live together, permanently, temporarily or intermittently, in relatively close proximity in a settlement, consisting of a least five (5) dwellings such as houses and other built structures, which is considered to be a specific administrative or socio-political entity, by the residents, and is recognized as such by the members of other communities. This definition includes both permanently inhabited settlements and those that are considered to be ‘summer or winter residences’ which are mostly inhabited temporarily in the summer/winter months, but which may be inhabited by some households permanently.

Stakeholder Groups	Key Stakeholders	Summary of Specific Interests
<i>Media</i>	Print media, circulated widely in Urgun Soum: <ul style="list-style-type: none"> - 'Daily News' & 'Zuunii Medee' (Century News) Broadcasting media: <ul style="list-style-type: none"> - TVs: Mongolian National Broadcaster & TV9 channel, MN 25, TV5 - Radio station: FM 101.5 station "My homeplace" & Mongolian National Radio Station 	<i>Local news items of interest to readers and listeners/viewers</i>

5 Senj Sant LLC Stakeholder Relations

5.1 OVERVIEW OF EXISTING STAKEHOLDER ENGAGEMENT

Community Relations

The Company has undertaken engagement activities including consultation with certain stakeholders during the early stages of development of the project.

Previous Stakeholder Engagement

Considerable preparatory work has been completed including studies such as the EIA Report, land acquisition and an acquisition plan, mineral rights, and some on site works such as creation of a small employee camp and fencing of the cement plant site. Senj Sant already has established stakeholder relations with Aimag and Soum Authorities and central government ministries and departments. In particular, a number of actions in/near Urgun settlement have been initiated at the request of the Soum Authority, for example, assistance with solid waste management. There have been a number of meetings with key local stakeholder groups, including representatives of the local population, as part of the scoping exercise for the supplementary impact assessment information developed during the spring of 2012.

There are no current consultation relationships with NGOs as none are considered to be active in the local area. In terms of Community-Based Organizations or Associations, there has been little direct consultation though members of such organisations are likely to have been engaged with Senj Sant LLC in the context of wider consultations with respect to project implementation to date.

6 Stakeholder Engagement Programme

6.1 DISCLOSURE OF INFORMATION

The objectives of these external communications are to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation.

The local community are aware of the proposed project although specific details have not been announced. The affected communities will be informed about the project in detailed terms, i.e. the expected results and the duration of the construction works and operational phase characteristics.

Senj Sant LLC will provide relevant information to the public. All interested and affected parties will be able to find the following documents on the Company's website:

http://www.monpolymet.com/index.php?option=com_content&view=article&id=18&Itemid=18&lang=en

- This SEP;
- A Land Acquisition Framework, with key committed principles regarding the acquisition and use of land;
- A Non Technical Summary (NTS) for this project; and
- The Environmental and Social Supplementary Assessment Information Report.

All the information will also be made available in hard copy in both the Senj and Sumbayr Bag at the locations shown below. Hard copies will also be made available at the Aimag Government in Sainshand,

In addition to the agreed locations, hard copies of these documents will be available at the following location:

Senj Sant LLC, Urgun Site Office

Site Manager: Boldbayar Luntan
Email: boldbayar@monpolymet.mn
Tel: +(976) 99905725
Website: www.monpolymet.com

And also at:

Senj Sant LLC, Ulaanbaatar Office
Tengerlin Tsag Centre,
Olympic Street – 14
Ulaanbaatar
Mongolia
Phone. + (976) 11 311 633

Contact:
Ms. Khaliun Tserenpil
Project Assistant
Email: khaliun@monpolymet.mn
Telephone: 99220792

In addition, a copy will be placed at the following independent addresses in both Sainshand and Urgun:

Sainshand:

Sainshand Governor's office
Governor: B. Batbayar
fax: 01522-22440
mobile: 93019955
Dornogobi, Mongolia

Urgun:

Urgun Soum Governor's office
Governor: S.Purevkhoo
fax: 025248-4052
mobile: 99041769
Dornogobi, Mongolia

These documents will remain in the public domain for the duration of the Project. The SEP will be periodically updated.

The types of information disclosed and the specific methods of communication to be undertaken by Senj Sant LLC are summarised in the Stakeholder Engagement Programme in Table 3 below.

6.2 THE FUTURE PROGRAMME

The project manager will be responsible for the communication activities for the project. As construction of the project commences, there will be a nominated further person committed to manage the ongoing programme of planned stakeholder engagement, including community liaison. The SEP will be updated with additional contact information when additional roles and responsibilities are finalised.

The department will collate any comments and feedback associated with future projects and will document these.

All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

Community Consultation Committee

If considered appropriate with the local community, a Consultation Committee will be set up in cooperation with the local host community in Urgun. This will include a number of key community representatives, including the Village Head, informal herding community representatives and a representative from the regional authority and from the local school. Local business people, and other groups such as young persons will be invited to participate. The group will coordinate on-going discussions on evolving issues, be consulted on the planned stakeholder engagement activities and provide a mechanism to feedback to the project team on the requirements and concerns of the community.

The future programme of engagement is presented below which will be reviewed and updated on an on-going basis.

Table 3: Stakeholder Engagement Programme

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
PRE-CONSTRUCTION PHASE			
Disclosure of Supplementary Information Report	<p>NTS and Environmental and Social impact supplementary information.</p> <p>Expected construction, operational and decommissioning/abandonment impacts and mitigation measures to avoid/reduce adverse impacts and actions to enhance potential benefits.</p>	<p>Initial Announcement of the availability of the Supplementary information and the overall intentions for public consultation, through local print media and radio.</p> <p>Advertisement of the information must be made in the following:</p> <ul style="list-style-type: none"> - 'Daily News' & 'Zuunii Medee' (Century News) - Radio station: FM 101.5 station "My homeplace" 	<p><i>Government</i></p> <p><i>NGOs</i></p> <p><i>Local community</i></p> <p><i>Public Groups</i></p> <p><i>Potential Clients</i></p> <p><i>General public</i></p>
Disclosure of Supplementary Information Report	<p>NTS and Environmental and Social impact supplementary information.</p>	<p>Public consultation meeting, followed by an open house 'drop in' event within each Bag, with a 'comments' book available.</p> <p>This will be undertaken approximately 30 days from the date of disclosure, at a time when the community will be specifically</p>	<p><i>Local community</i></p> <p><i>Public Groups</i></p> <p><i>Government Authorities</i></p> <p><i>Herder representation</i></p>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		<p>available in the area (eg near to a festival period to be identified dependent on disclosure timescales).</p> <p>The consultation invite will be provided to all identified stakeholders, including nomadic herders using the areas of the project by:</p> <ul style="list-style-type: none"> • Advertising the date, place and time of the public consultation meeting in a press announcement, local media television and radio. • Notices on public notice boards, in shops, local offices etc. • Information delivered to local businesses / residents through a information leaflet giving key details date, time and coverage of the meeting and following up 'drop in sessions, along with details of transport provision. • Official notice on public notice boards in Urgun and Sainshand. • Informing the 'informal head' of the herding community based in Urgun, a minimum of three weeks prior to the meeting. • A minimum of three weeks prior to 	

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		<p>the meeting, the land areas relevant to the project and potential project impacts will be visited so that any new herding families can be specifically visited and the coverage, time and transport facilities for the meeting and drop in sessions can be directly discussed with the inhabitants in the region. This must include details of the free transport that can be offered along with contact details to make a booking if needed. The area visited must include all direct land areas which will be used by the project, and associated land areas being considered in the disclosure such as the northern aquifer area, surrounding springs, wells and temporary water sources, along with land users within the vicinity of the route of the transmission line.</p> <p>The announcements will include specific information on transportation that Senj Sant will provide so that people remote from the venue can attend. This will specifically target herders which may have interest in the project.</p>	

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		<p>A full record of the sessions will be maintained, with reporting back of responses to questions and comments made.</p>	
<p>General pre-construction planning and Site preparation prior to construction.</p>	<p>Overall schedule of site preparation and construction, including sub activities, key stages and potential stages of stakeholder interest, including water supply systems implementation, rail connection, village well development and construction / operational workcamp development.</p>	<p>Notices on public notice boards, in shops, local offices etc. Information delivered to local businesses / residents through leaflets and open house meetings, as well as public notice boards. Press announcement, local media television and radio. Community Liaison Groups, monthly meetings. A Consultation Committee will be set up prior to construction within Senj Bag. A community management policy will be developed and agreed by SSL and the committee.</p> <p>Implementation of the full commitments within the Land Acquisition Framework. This will include identifying the specific users of the land area prior to the acquisition or use of the land. The specific needs of these users will be identified at each stage. Where</p>	<p><i>Local community</i> <i>Public Groups</i> <i>General public</i> <i>NGOs</i></p>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		there is any potential for an impact on these users and their requirements, there will be full assessment of these impacts and compensatory measure will be provided so that no overall losses are suffered by these users.	
Specific consultation with herders: Disclosure of Supplementary Information Report.	NTS and Environmental and Social impact supplementary information. Information on project utilisation of water resources and land acquisition and use.	Focus group meetings to be undertaken in each Bag. Specific focus group for Herders	<i>Local community specifically targeted at herders.</i>
Specific consultation with Women of Urgun: project components and potential opportunities.	Information on project components, in particular the use of a Chinese construction workforce, and also potential employment opportunities, including skills required and training opportunities.	Focus group meetings to be undertaken in Urgun village. Specific focus group meeting for Women.	<i>Local community specifically targeted at women.</i>
Specific consultation with the young people of Urgun: Discussion of project components and potential opportunities.	Information on project components, in particular the use of a Chinese construction workforce, and also potential employment opportunities, including skills required and training opportunities.	Focus group meetings to be undertaken in Urgun Village. Specific focus group for Young people.	<i>Local community specifically targeted at young people.</i>
Consultation for the implementation of the new village well.	Provision of information on the water supply to the (MNEaGD) and MoH (potential from Chandman Ilch LLC), including: - yield, and calculation showing sustainable supply through adequate recharge rates.	Written communication and written acceptance prior to use of the new village well. Written agreement on well maintenance responsibility.	<i>Ministry of Nature, Environment and Green Development (MNEaGD) Ministry of Health (MoH). Chandman Ilch LLC Office headquarter: Sainshand</i>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
	<ul style="list-style-type: none"> - Water quality and evidence of potability in line with WHO and Mongolia Standards. - Treatment facilities required to consistently achieve water quality standards. <p>Written agreement of the responsibility for the ongoing maintenance of the well.</p>		
Discussion of impact of the new village well on the use of the current Senjit Khudag Well.	<p>Impact of the intended new village well on the current Senjit Khudag well.</p> <p>Timescales for implementation of the new village well and continued need for the tinkering into the village.</p> <p>Discussion of alternative employment opportunities, for instance as a driver, within the MONCEMENT project.</p>	The residents living adjacent to the water pumping station will be directly consulted.	<i>The residents of the Ger adjacent to the water pumping station near the quarry site.</i>
Consultation with herders regarding the installation of the new 10km water pipeline and temporary impacts on the temporary water features.	<p>Discussion with herders utilising the area and informal herder groups within Urgan, to discuss:</p> <ul style="list-style-type: none"> - Phased timing of the construction. - Temporary land access and crossing restrictions. - Potential change of surface water flows during construction. - Proposed mitigation, including pumping of water flows to surface water accumulation areas if needed. 	Herders specifically identified through the assessments prior to construction required under the Land Acquisition Framework.	<i>Herders in the area at the specific time of pipeline construction commencement.</i>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
Archaeological Assessment of the quarry and cement plant areas.	Documented consultation with the Institute of Archaeology of the Mongolian Academy of Science.	Direct consultation as part of the delivery of a detailed phased assessment of the potential for archaeological assets in the vicinity of the site.	<i>Government body: the Institute of Archaeology of the Mongolian Academy of Science</i>
Development of the construction workcamp.	<p>Schedule of construction works.</p> <p>Details of workforce to be temporary resident in the area.</p> <p>Details of the content of the Code of Conduct for the workforce at the workcamp, including camp self sufficiency, closed camp status and cultural sensitivities.</p> <p>Details of local employment opportunities during the construction phase.</p>	<p>Direct consultation with the Urgun Village through consultation with the Urgun nominated representatives / community 'leaders'.</p> <p>The Consultation Committee, set up prior to construction within Senj Bag will be consulted on the arrangements for accommodating workers and for restriction of normal access into Urgun Soum and for any planned interaction such as through cultural events or local trading.</p> <p>The code of conduct may be revised following consultation.</p>	<i>Urgun Community / General Public</i>
Shuvuun Huuvur Spring utilisation engagement	Information on potential impact to the Shuvuun Huuvur Spring and timing.	<p>Meeting with herder group prior to project operation, to discuss:</p> <ul style="list-style-type: none"> - potential impacts on the spring - likely timings - alternative arrangements to be made for water availability - alternative spring sources which could be 	<i>Herder Groups: 2 Families located within 5km of the Shuvuun Huuvur Spring:</i>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		<p>utilised.</p> <p>Direct written and verbal communication to identified herder families to ensure full understanding of the above. A record will be maintained of these communications.</p>	
CONSTRUCTION PHASE			
Construction Phase general information provision.	<p>Schedule of construction works.</p> <p>Construction activities.</p> <p>Progress of construction.</p> <p>Construction impacts and mitigation measures (with opportunities for feedback from affected communities).</p>	<p>Notices on public notice boards, in shops, local offices etc.</p> <p>Information delivered to local businesses / residents through leaflets and open house meetings, as well as public notice boards and safety signs.</p> <p>Newspaper; Daily News' & 'Zuunii Medee' (Century News)</p> <p>Broadcasting media:</p> <p>Radio station: FM 101.5 station 'My homeplace'</p> <p>Community Liaison Groups, as part of the monthly meetings.</p>	<p><i>NGOs</i></p> <p><i>Local community</i></p> <p><i>Public Groups</i></p> <p><i>General public</i></p>
General construction scheduling updated		Planned direct consultation meeting to explain construction schedule and working	<i>Residents of the Ger adjacent to the water pumping station.</i>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
information.		hours, site access roads, safety considerations and communication and grievance mechanisms.	
Specific consultation with community in the north of Urgun settlement, near to the new road routing.	Direct discussion meetings with residents. Provision of a written 1 page summary guide with enquiry and grievance contact details.	Specifically planned and personally invited consultation meeting to explain construction schedule, road traffic expected, working hours, safety considerations and communication and grievance mechanisms.	Residents living nearest to the route of the new road on the perimeter of the town (as defined in the acoustic survey in the supplementary information).
Specific consultation with community in the east of Urgun settlement adjacent to the new rail spur.	Direct discussion meetings with residents. Provision of a written 1 page summary guide with enquiry and grievance contact details.	Specifically planned and personally invited consultation meeting to explain construction schedule, future rail traffic expected, noise levels and working hours (daytime), safety considerations for the rail line and communication and grievance mechanisms.	Residents living nearest to the route of the new rail spur on the east perimeter of the town (as defined in the acoustic and social chapters in the supplementary information).
End of construction / beginning of operation.	Description of plant and operations. Operational hours. Employment needs and opportunities.	Press release Announcement on the Senj Sant LLC website Local media, television, radio, newspaper Community Liaison Groups, monthly meetings. .	<i>Government</i> <i>NGOs</i> <i>Local community</i> <i>Public Groups</i> <i>Potential Suppliers</i> <i>Potential Clients</i> <i>General public</i>
		Planned direct consultation meeting to explain quarry operations, working hours, use of site access roads, safety considerations and communication and	<i>Residents of the Ger adjacent to the water pumping station.</i>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		grievance mechanisms.	
OPERATIONAL PHASE			
Employment Opportunities	Information on employment opportunities, skills required, training and support provided and access to information.	<p>Advertisements within regional employment publications, specifically within Sainshand and Urgun.</p> <p>Information boards within public / government offices at Sainshand and Urgun.</p> <p>Newspaper adverts; Daily News' & 'Zuunii Medee' (Century News)</p> <p>Broadcasting media: Radio station: FM 101.5 station 'My homeplace'</p>	<p><i>Local and regional community.</i></p> <p><i>Local and regional businesses.</i></p>
Herder access to water resources.	Information on ongoing use of groundwater resources and potential effects on surface water features, in particular the Shuvuun Huuvur Spring.	<p>Direct meetings with herders using the area following the mitigation stages defined in the Water Chapter (Groundwater Resources) within the Supplementary Information Report, including:</p> <ul style="list-style-type: none"> - Results of detailed assessment of the Northern Aquifer and updated predictions on the effects on the 	<p><i>Herder groups identified to have an interest in the water sources associated with the Northern Aquifer and specifically identified at the time of the project operational stage.</i></p>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		<p>springs and wells associated with this aquifer.</p> <ul style="list-style-type: none"> - Results of the assessments on the potential use of alternative aquifers to be utilised by the project. - Results of the assessment of the need to artificially recreate a surface water feature in the area of the Shuvuun Huuvur Spring <p>6 monthly meetings with herder groups in the region to ensure that water access has not been restricted and the supply has not deteriorated. Documented results of these meetings with an action plan committed if required.</p>	
Company Performance in Operational Phase	Annual update and reporting on the ESAP.	<p>Company Reports.</p> <p>Summary under 'Social Responsibility' section of company website.</p> <p>Bi-annual meetings (one every 6 months) with appointed personnel to review performance and consider issues raised by local stakeholders.</p>	<p><i>Internal Stakeholders</i></p> <p><i>Local community</i></p> <p><i>Suppliers</i></p> <p><i>Clients</i></p>

Activity	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
		Community Liaison Groups, ongoing six-monthly meetings.	<i>Local community</i> <i>Public Groups</i>

6.3 Monitoring, reporting and feedback mechanisms

Through communication channels such as media and newsletter notifications, surveys, exhibitions, one-to-one meetings and the periodic meetings, Senj Sant LLC will monitor and provide feedback as appropriate.

Future important public consultation meetings or public exhibitions will be arranged at venues to enable stakeholders to participate. An open book (with pens provided) will be positioned in a suitable location for recording comments anonymously. This book will be presented in an obvious area of the exhibition but in an area that will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by Senj Sant LLC so that a response and feedback can be made to stakeholders.

On an annual basis, Senj Sant LLC will produce a public report on their social and environmental performance, including a non-technical summary of the Environmental and Social Action Plan (ESAP)² and progress made with the implementation of the ESAP, against agreed indicators and targets.

6.4 Grievance Mechanism

Senj Sant LLC will implement a formalised approach to the management of responses to enquires and grievances. This is considered to be essential to understand, respond and effectively resolve issues of stakeholder concern. A grievance mechanism will be adopted as presented in Figure 1 below. The grievance form that will be used is also presented below.

We welcome any comments or any other enquiries on the commitments within this document or the project in general. Also, we are committed to an open and fully formalised approach to management of any grievances in relation to the project. There is a formal mechanism which is fully described within the stakeholder engagement plan for this project. An overview of the handling processes for any grievances is also included below. We consider this to be essential to understand, respond and effectively resolve issues of stakeholder concern.

A summary of our procedure for handling project grievances is:

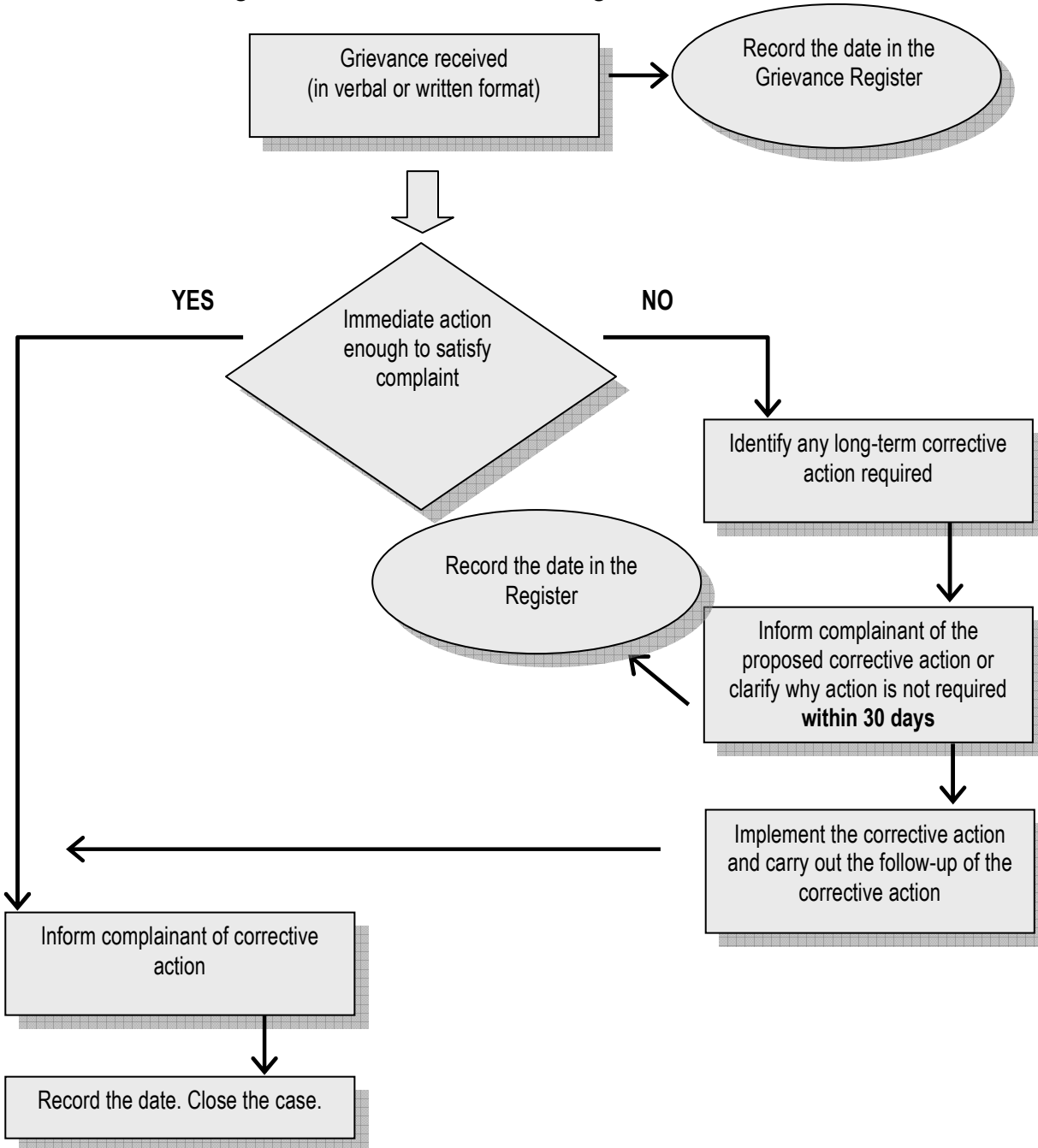
- You are welcome to report any concerns, grievances or other comments to use in writing, by email or in person at our offices.
- We will take full details of these concerns expressed and ensure that our designated point of contact is made fully aware of the communication so that a formal assessment will commence. We will record the date and contact information on the grievance on our standard form and place a copy in our project grievance register.
- Alternatively, we can provide our form which can also be used to report your concern. Completion of this form will ensure we have all information necessary to effectively conduct our investigation. This form can be completed anonymously if necessary. We will ensure one of these is completed for all grievances on the project and these will be placed on the project grievance register.
- You are welcome to propose to us what you would like to happen in response to the issue.
- We will undertake an investigation to assess what corrective and preventive action, or further investigation, is necessary as part of our investigation.

² The ESAP is a document that outlines actions that will be implemented to address environmental and social risks associated with particular aspects of the project. As part of the plan investment needs, timeframes and targets for successful delivery are assigned to each action.

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- We will respond to you within 30 days and place details of our completed corrective and preventive actions within the Grievance register. If a longer term programme is required to provide an adequate solution then this programme will be detailed on the register against the specific grievance.

Overall, grievances will be registered and will include all grievances, whether received in writing or verbally. The complainant will receive an acknowledgement of the receipt of the complaint within a reasonable timeframe, this will be completed in writing.

Figure 1: Flowchart for Processing Grievances



Public Grievance Form

Reference No:	
Full Name	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____
	By Telephone: _____
	By E-mail _____
Preferred Language for communication	[English] [Mongolian]
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	
	One time incident/grievance (date _____) Happened more than once (how many times? ____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Send this form to:

Ms. Khaliun Tserenpil
Project Assistant
Email: khaliun@monpolymet.mn
Telephone: 99220792