



Adjaristsqali Hydropower Cascade Project

Stakeholder Engagement Plan - Final Report

September 2013

Adjaristsqali Georgia LLC



Clean
Energy
Group



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1 Introduction and project description

1.1 Overview

Adjatistsqali Georgia LLC (hereafter referred to as AGL) is undertaking the development of the Adjatistsqali Hydropower Cascade Project (the 'Project') in the Autonomous Republic of Adjara, Georgia (Figure 1.1).

Figure 1.1: Project location within Georgia



The Project is part of the Government of Georgia's (GoG) energy policy to achieve economic independence and sustainability in the energy sector as well as the provision of energy security through domestic sources. In addition Georgia considers electric power to be an export commodity and is aiming to develop this potential. The Project will supply the Georgian and Turkish power systems with renewable energy, with most of the electricity being exported to Turkey.

AGL has commissioned Mott MacDonald Limited (MML) and Gamma Consulting Limited (GCL) to assist with the development of the Environmental and Social Impact Assessment (ESIA) for the Project in parallel with the feasibility studies being undertaken by MML. From February 2013, AGL assumed the role as Employer and liaise daily with MM team members on site and in the UK when required.

This document is our Stakeholder Engagement Plan (SEP) and forms part of the suite of ESIA documents. The purpose of the SEP is to enhance stakeholder engagement throughout the life cycle of the project particularly prior to and during the construction and operation of the Adjatistsqali Hydropower Cascade and to carry out stakeholder engagement in line with national laws and international best practise such as the requirements of the International Finance Corporation (IFC) and the European Bank of Reconstruction and Development (EBRD) and the Asian Development Bank (ADB).

1.2 Project history

In May 2010 AGL was successful in receiving concessions for three potential hydropower schemes on the Adjaristsqali River. The concessions received were for the Shuakhevi, Koromkheti and Khertvisi sections of the Adjaristsqali River and specific tributaries, and collectively these comprised the Adjaristsqali Hydropower Cascade Project.

The ESIA was undertaken during the Feasibility Study stage (July 2011-August 2012), in order to assess whether the Project met relevant international environmental and social standards. The ESIA, at the time of its finalisation in October 2012, was prepared including consideration of three scheme concessions: Shuakhevi, Koromkheti and Khertvisi.

The ESIA was initially prepared for the Project in accordance with standards of the original project financiers, namely the International Finance Corporation (IFC) Performance Standards and European Bank for Reconstruction and Development (EBRD) Performance Requirements. The ESIA has been subsequently reviewed by the Asian Development Bank (ADB), which is also providing finance for the Project, and it was found to be in accordance with their requirements also.

Detailed engineering design was undertaken subsequent to issue of the ESIA. During this process it was identified that significant economic and environmental risks were present with the Khertvisi scheme, including the potential for construction activities to fall within the boundaries of the planned Machakhela National Park. Due to these considerations AGL has confirmed that although it retains the concession at present, the Khertvisi scheme will not be pursued as part of the third and final phase of the Project. The Project to be developed will therefore constitute the Shuakhevi and Koromkheti schemes only.

1.3 Project description

The Project now comprises two separate hydropower schemes operating in cascade along the Adjaristsqali River (see Figure 1.2 overleaf). Each scheme consists of a combination of dams and weirs, reservoirs, headrace and transfer tunnels, powerhouse, power evacuation, and access roads. The two cascade schemes are Shuakhevi (185 MW installed capacity) and Koromkheti (150 MW installed capacity), which will provide an annual average production of 930 GWh of renewable electricity (465 GWh for each scheme). The generated electricity will be primarily sold on the Turkish energy market and supplied to the Georgian energy system during the winter (December, January, and February).

The Project will also require transmission lines for transmitting the generated electricity to substations for eventual use by consumers¹. It is proposed that a new 220 kV transmission line will be constructed connecting into existing national grid at Batumi and Akhaltsikhe substations. The construction of the transmission line is a separate project and will be undertaken in accordance with the national permitting requirements (this includes requirement to develop a stand-alone ESIA).

¹ Transmission lines will be subject to separate technical, environmental and social studies. Broadly it has been identified that a new 220kV transmission line will be constructed following the existing transmission line corridor running through the valley from Batumi.

Figure 1.2: Adjaristsqali Hydropower Project Infrastructure



Source: AGL

The development of the transmission line is not included as part of the activities for which AGL are seeking finance. However, as this will be an associated facility, high level comment has been made to the extent possible in accordance with IFC requirements (IFC, 2012c).

The Project is envisaged to be operated as a peaking plant, whereby the cascade will aim to operate at maximum capacity during the periods of high electricity demand, when there are high prices in Turkey (electricity prices vary depending on the time of day). Each scheme has small reservoirs to enable daily storage of water which allows the schemes to operate to full capacity at chosen times of the day to meet peak demand. A brief summary of the two schemes is provided in the sub-sections below.

1.4 Shuakhevi scheme

The total installed capacity of the Shuakhevi scheme will be 185 MW. The project envisages arrangement of two dams with reservoirs on the Adjaristsqali and Skhalta Rivers and one weir on the Chirukhistsqali River. River water will be diverted through tunnels from the abstraction points on the Skhalta and Chirukhistsqali rivers into the Didachara reservoir on the Adjaristsqali River from here it will be sent through headrace tunnel to the Shuakhevi HPP. A small-capacity HPP (10MW) will be arranged at Skhalta utilizing the water being transferred from the river Chirukhistsqali, while the main power unit (Shuakhevi HPP) will be arranged on the right bank of the Adjaristsqali River near Shuakhevi village and the confluence of the Adjaristsqali and Chirukhistsqali rivers.

1.5 Koromkheti scheme

Installed capacity of the HPP will be 150 MW, which will include one dam and reservoir on the river Adjaristsqali (below the Shuakhevi HPP), one low-threshold dam on the river Chvanistsqali and weir on the river Akavreta. The water transportation is considered by the diversion tunnels. An underground HPP arrangement is planned on the left bank of the Adjaristsqali River near Koromkheti village.

2 Regulations and requirements

2.1 Overview

As part of AGL's on-going commitment to good corporate governance and to project stakeholders, this SEP is designed to meet international best practise and the laws of the Democratic Republic of Georgia. Georgia has signed and ratified the United Nations Economic Commission for Europe's Aarhus Convention, which relates to access to information, public participation in decision-making, and public access to justice in relation to the environment. Therefore the laws of Georgia are broadly aligned with the lenders' stakeholder engagement requirements.

2.2 Georgian requirements

The Constitution of Georgia guarantees public access to information and states the right of an individual to obtain full, unbiased and timely information regarding his/her working and living environment.

The environmental permitting system is governed by the Law of Georgia on Environmental Impact Permit (2007); Law of Georgia on Protection of Environment (enacted 1996, amended 2000, 2003, 2007); Law of Georgia on Licenses and Permits (2005); and Law of Georgia on Ecological Assessment (adopted in 2007). Public participation in project development is regulated under the Law on Environmental Impact Permit (2007). Under the Law, the project developer is required to prepare an ESIA and is responsible for public engagement, which includes announcing public disclosure of the document in both central and local media. The law states that public participation and provision of access to information are obligatory procedures of the environmental permitting process. This is conducted in the form of a public discussion of the proposed activity with participation by the investor, the Ministry of Environment Protection and local administrative authorities.

2.3 International Finance Corporation (IFC) requirements

Public consultation, disclosure and stakeholder engagement are key requirements of IFC's Policy on Social and Environmental Sustainability embodied within the Performance Standards (PS).

The requirements for stakeholder engagement in projects are:

- Start as early as possible in the project cycle;
- Continue throughout the life of the project;
- Be free of external manipulation, interference, coercion, or intimidation;
- Where applicable enable meaningful community participation; and
- Be conducted on the basis of timely, relevant, understandable, and accessible information in a culturally appropriate format.

IFC seeks to provide accurate and timely information regarding its investment and advisory activities as well as more general institutional information in accordance with its Access to Information Policy. IFC's Access to Information Policy states that for all Category A projects, such as this one, a summary of its review findings and recommendations will be disclosed and include as a minimum the following information:

- Reference to the performance standards and any applicable grievance mechanisms, including the compliance advisor/ombudsman;
- The rationale for IFC's categorisation of the project;
- A description of the main social and environmental risks and impacts of the project; and
- Key measures identified to mitigate those risks and impacts, specifying any supplemental measures and actions that will need to be implemented to undertake the project in a manner consistent with the Performance Standards.
- Electronic copies or weblinks to any relevant environmental and social impact assessment (ESIA) prepared by the developer
- Any additional documents such as Action Plans, Stakeholder engagement plans, Resettlement action plans, etc.

Published project or investment information will be disclosed through their Disclosure Portal at <http://www.ifc.org/disclosure>. Relevant environmental and social information must be made publicly available for at least 60 days prior to consideration of investment approval by IFC's Board of Directors (or other relevant authority).

2.4 European Bank for Reconstruction and Development requirements

The Environmental and Social Policy (2008) and Public Information Policy (2008) documents outline EBRD's key policies with regards to information disclosure and stakeholder engagement. Similarly to the IFC, EBRD requires the project sponsor to provide the public, including NGOs, with information about the project during scoping stage and to prepare an SEP. The 2008 EBRD policy requires project sponsors to engage with stakeholders from the earliest stages of the project throughout the life of the project. Stakeholder engagement must be open, meaningful, and in an appropriate manner acceptable to the potentially affected communities. The engagement program must actively address the needs of vulnerable populations who may be affected by the project. The EIA documents must remain in the public domain for the life of the project, and if changes to project plans are necessary, these have to be made public as well.

EBRD's Public Information Disclosure Policy requires ESIA documents to be available through their Business Information Centre and resident offices as well as their website at least 60 days prior to consideration of the project by the Board of Directors for private sector projects.

2.5 Public consultation requirements under the EU

The European Union's EIA Directive 85/337/EEC (as amended by 97/11/EC, 2003/35/EC, and 2009/31/EC) describes the impact assessment process that their member states must follow. The EIA Directive requires significant public consultation throughout project development, impact assessment, and project implementation. It also includes the tenets for public participation that are incorporated in the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.

The Directive requires that public participation for projects which may have environmental and/or social impacts takes place early in the decision making process and alternatives are presented. As the project

develops, the public is to be provided with relevant information. Public comments must be taken into account and any rejection or disregard of the comments needs to be clearly justified. The public is to be notified of decisions made and the reasons for the decisions. The Directive provides members of the public with the right to challenge decisions or actions based on substantive or procedural legality. EU Directive 2003/4/EC on Public Access to Environmental Information also grants right to the public to access information either held by public authorities or for public authorities and incorporates the provisions and requirements of the Aarhus Convention on public access to environmental information, with a wider remit than that applicable under the EIA directive.

2.6 Asian Development Bank requirements

ADB has similar requirements to EBRD and IFC with regards to consultation and disclosure for category A projects such as this.

The ADB's 2005 Public Communication Policy outlines the need to disclose impact assessment results and allow stakeholders to provide comments during a disclosure period. The Policy supports the right of people to seek, receive, and impart information and ideas about ADB-assisted activities. Through the Policy, ADB seeks to provide information in a timely, clear, and relevant manner and to share information with project-affected people early enough to allow them to provide meaningful inputs into project design.

The requirements are reaffirmed in the ADB's Safeguard Policy Statement (SPS) of 2009, which defines 'meaningful consultation in the following way:

A process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

Within the SPS, Safeguard Requirements 1: Environment states that the borrower/client will carry out meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation in Project development.

3 Previous stakeholder engagement

AGL committed to engaging stakeholders early in the development process to encourage their support and input in pursuit of improved outcomes and long-term sustainability. This section describes information disclosure, consultation and participation activities already undertaken.

After being awarded the Project concession, AGL organised meetings with the government. The project was publicised on television by Vera Kobalia, Minister of Economy and Sustainable Development of Georgia. Key meetings were held with Levan Varshalomidze, Chairman of the Autonomous Republic of Adjara (March 2011) and Grigol Tsamalashvili the Deputy Minister of the Ministry of Finance for Adjara (May 2011).

In June 2011 a signing ceremony of the project Implementation Agreement by the Georgian government, was attended by local government, Alexander Khetaguri, Minister of Energy, and Bard Mikkelson, Clean Energy Invest Executive Chairman (June 2012). AGL prepared a press release and brochure in English specifically for the signing ceremony. The brochure provided an overview of the project, the feasibility studies undertaken to date, a brief description of the developer and companies contracted for the feasibility study and the ESIA.

In June 2011, a project disclosure meeting was held in Khulo to introduce the project in more detail to the municipalities within which the project is located. The meeting was attended by heads of local councils, chief executives of the municipalities within the project area, representatives of local administration, and the deputy minister of Finance and Economy for Adjara. A full list of attendees is included in Appendix A. The meeting consisted of a brief presentation by AGL's Project Director, followed by a brief presentation on the ESIA process and objectives of assessment by both Mott MacDonald and Gamma (ESIA consultants). Journalists from local newspaper Adjara and Adjara TV channel attended and reported on the meeting.

The objectives of the above disclosure activities were to:

- Publicise the proposed development of the project both at local and national level
- Engage key stakeholders by introducing the pre-feasibility study, on-going feasibility exercise and ESIA process
- Identify additional potential and key stakeholders
- Identify concerns and opportunities to be addressed by the feasibility study and ESIA process
- Provide stakeholders with points of contact to address further concerns and liaise with over project development.

Table 3.1 overleaf provides a summary of the 2011 disclosure of the project in the media (TV, newspapers, and online).

These initial meetings revealed the municipalities overall interest and support of the project. Main concerns raised during the Khulo meeting were related to impacts on water levels, flows and private properties and the need to maintain a high level of consideration for the environment as part of the project development. Of key interest and importance was the potential for employment generation that the project would create within the region as well as potential source of increased revenue for the municipalities through the payment of property taxes (yearly tax of 1% of investment costs).

Table 3.1: Adjaristsqali Cascade HPP Project in the media

Description	Date	Media	Language
Announcement of project by Ministry of Energy	May 2010	Ministry webpage	Georgian
Information on proposed construction of the Project and implementation agreement signing ceremony	11.06.2011	Reports on National TV channels; Public TV, Imedi, and Rustavi 2. Local TV "Chanel 25"	Georgian
Information on proposal to develop the Project and interviews with Gross Energy (local consulting supporting feasibility study)	11.06.2011	Report on Adjara TV Article in "Adjara" newspaper	Georgian
"Construction of HPP Launches on Adjaristsqali"	11.06.2011	Online article www.onlinenews.ge	English
Initial project disclosure meeting to heads of municipalities within which the project is located	15.06.2011	Adjara TV	Georgian
"Signing of Implementation Agreement for up to 660 mln USD Adjaristsqali river hydropower project between the Georgian Government and Clean Energy Invest AS"	15.06.2011	Online article http://commercial.ge	English
"Clean Energy Invest AS to Develop HPP Project in Adjara"	17.06.2011-23.06.2011	Online article http://georgiatoday.ge	English
New Power Projects on Adjaristsqali river	15-22.08.2011	Batumelebi Newspaper	Georgian
Discussions on Hydropower projects	23-25.07.2011	Adjara Newspaper	Georgian
Hydroelectric power stations on the river Acharistskali	01.11.2011	Government of Autonomous Republic of Ajara webpage	English & Georgian
The project is registered as CDM	12.11.2012	Government announcement	English & Georgian
Indian companies implement hydropower	23.05.2013	Georgia Times Online newspaper	English
Adjaristsqali project underway	2013 issue N1	Invest in Georgia Monthly Supplement to Georgia Today	English
Our investment is a future asset for Georgia	29.07.2013	Batumelebi Newspaper www.netgazeti.ge	Georgian

In 2012, the Project was registered as a Clean Development Mechanism (CDM) project. There was a Government announcement of the registration in the media. CDM documents were produced in Georgian and English. Since March 2012, the draft and then the approved ESIA documentation have been available on AGL's project specific website www.adjaristsqali.com. Focus group meetings were held with village representatives, wider municipality heads, affected landowners and women's groups. Public consultation meetings were announced two weeks prior to their occurrence in national and regional newspapers and via radio. As part of the ESIA process, a Biodiversity Action Plan workshop was held in September 2012.

In May 2013 the involvement of Tata Power in the Project was publicised in Georgia Times and other newspapers. Further local and net press articles on the investment were made in July 2013.

4 Stakeholder identification and analysis

Stakeholders are persons or groups who are directly or indirectly affected by a project as well as those who may have interests in a project or the ability to influence its outcome, either positively or negatively. Table 4.1 presents the main stakeholder groups and the means by which the project will engage with them.

Table 4.1: Overview of Stakeholder Groups and Methods of Engagement

Stakeholder Group	Public meetings and exhibitions	Private meetings and workshops	Focus groups	Mass Media communications	Disclosure of written information	Community liaison
<i>Internal Stakeholders</i>						
Employees and labour representatives	✓	✓		✓	✓	
<i>External Stakeholders</i>						
Local Project Affected Communities	✓		✓	✓	✓	✓
Physically and economically displaced Project Affected People (PAPs)	✓	✓	✓	✓	✓	✓
International and Regional Governmental Bodies & Financial Institutions	✓	✓		✓	✓	
National Government Departments	✓	✓		✓	✓	
National Bodies	✓	✓		✓	✓	
Provincial / Local Government Departments	✓	✓		✓	✓	
Civil Society, NGOs & Research Bodies	✓	✓	✓	✓	✓	
Industry & Business	✓	✓	✓	✓		
Media & Press	✓			✓		

The names of specific stakeholder bodies under each of these groups and their relevance to the Project is presented in Table 4.2 below.

Table 4.2: Stakeholders Bodies and their Relevance to Project

Stakeholder Groups	Stakeholder Bodies	Relevance to Project
<i>Internal Stakeholders</i>		
Project Company Employees at HPP site once operational	Local NGOs	Will benefit from employment opportunities but also face potential health and safety risks and labour rights violations. Unions will safeguard the welfare and rights of workers.
Temporary Construction Workers	National NGOs & Employers	
Trade Union Members	Not identified at present	
<i>External Stakeholders</i>		
Local Project Affected Communities – Khulo	Didachara community village; Didachara Lekanashvilebi community villages; Diakonidzeebi,	Local communities may be adversely affected by construction and operational impacts but also

Stakeholder Groups	Stakeholder Bodies	Relevance to Project
Municipality	Duadzeebi, Tsifnari	may benefit from employment and indirect economic opportunities.
Local Project Affected Communities – Shuakhevi Municipality	Chvani community village; Akhaldaba	
	Oladauri community villages; Paposhvilebi and Makhalakidzeebi	
Local Project Affected Communities – Keda Municipality	Makhuntseti community villages; Qveda Makhuntseti and Qveda Bzubzu	
	Pirveli Maisi community village Pirveli Maisi	
	Qeda community village Koromkhети	
	Merisi community villages; Sikhaldzeebi and Inasharidzeebi	
Physically and economically displaced Project Affected People (PAPs)	Landowners within the project area and those living in the areas where access roads, dam structures, and powerhouses will be located	Entitles to compensation for land acquired in accordance with the Land Acquisition and Livelihood Restoration Plans (LALRP) developed as part of the ESIA process.
	Landowners within the project area that may be affected by the transmission line.	
	Landowners of parcels within inundated areas	
Industry and Business	“Kokotauri” mineral water bottling factory	Possible impact on the operating regime of existing HPP during construction and operation of the proposed Project.
	Atshesi HPP - JSC “Energo Pro Georgia”	
	Machakhela HPP	In case of the Project being implemented, the existing Machakhela HPP will no longer be able to operate and will have to be compensated.
	Sanalia Hesi Ltd.	The existing power station on Chirukhistsqali. Transmission line pylons must be relocated before the start of construction.
International and Regional Governmental Bodies / Financial Institutions	International Finance Corporation, European bank for Reconstruction and Development, The European Union, the Asian Development Bank	Financiers and regulators.
National Government Departments	Ministry of Energy and Natural Resources of Georgia	Meeting the requirements of country’s energy policy during the implementation of the planned activities
	Ministry of Environment Protection of Georgia	Meeting the requirements of Environmental Law of Georgia and International Environmental

Stakeholder Groups	Stakeholder Bodies	Relevance to Project
		standards during the implementation of the planned activities
Provincial/Local Government Departments	Ministry of Finance and Economy of Autonomous Republic of Adjara	Coordination of the financial and economic issues related to the project implementation.
	Directorate for environment and natural resources of Adjara Autonomous Republic	Meeting the requirements of Environmental Law of Georgia and International Environmental standards during the implementation of the planned activities.
	Administration of Khulo municipality	Property tax revenue to be received by municipality from the project may substantially increase annual budgets. Expectations for improvement of socio-economic conditions of the municipality. The possible negative environmental and social impact on the municipality.
	Administration of Shuakhevi municipality	
	Administration of Qeda municipality	
Civil Society, NGO's, Research Bodies	Administration of Khelvachauri municipality	
	Advocacy Center	Protection of rights of residents of the local communities and the environment during the project implementation
	Georgian Young Lawyers' Association office in Adjara	
	Human Rights Center office of Adjara	
	International organization of Justice and Truth, Protection of Oppressed and Prisoners' rights and Welfare	
	Union of Young Scientists "Intellect"	
	Free Journalist's House	
	"Step Forward"	
	Civil Society Institute, Batumi office	
	Union for promotion of development and cooperation - "Progress"	
	Democracy institute	
	Democracy institute, office of Qeda	
	Democracy Institute, office of Khulo	
	Black Sea Eco-Academy	
	Environmental association "Psovi"	
The wildlife protection society "Chaobi"		
Association of soil surface protection and promotion of sustainable use "Chorokhi"		
"Human and Environment"		
Greens Movement of Georgia /Friends of Earth		

Stakeholder Groups	Stakeholder Bodies	Relevance to Project
	Association "Green Alternative"	
Press and Media	Television of Adjara	Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.
	Television "TV 25"	
	Radio "Adjara"	
	Newspaper "Adjara"	
	Newspaper "Batumelebi"	
	Newspaper "Batumuri Qronikebi"	
	Newspaper "Adjara P.S."	
	Newspaper "Mtianeti"	
	Newspaper "Khulo"	
	Newspaper "Keda"	

This SEP and the stakeholder tables and database will be updated on an on-going basis as new stakeholders are identified through the Project implementation.

5 Stakeholder engagement programme

AGL will ensure that stakeholders are well informed about the Project throughout its lifecycle. Stakeholders will have the opportunity to express their opinion about the project and about AGL, including complaints. Table 5.1 below shows the information to be disclosed to stakeholders and authorities and the methods for communication. The delivery of information will meet all applicable legal requirements.

Table 5.1: Public Consultation and Disclosure Programme

Information to be disclosed	Timeframe	Communication / media tool	Opportunity for stakeholder comment
<i>Internal Stakeholders Engagement</i>			
Workers' grievance mechanism	From the commencement of Project activities	Bulletin board in break room, tool box talks, induction information when new groups of workers commence work on the Project	Workers (including non-employees) can lodge grievances at any time throughout their employment on the Project
Employment terms and conditions	From the commencement of Project activities	Included in contracts	Through staff grievance mechanism
Human resources and Environment, Health and Safety (EHS) policies and procedures	From the commencement of Project activities	Included in contracts	Through staff grievance mechanism
<i>External Stakeholder Engagement</i>			
Project schedules provided to directly affected stakeholders to notify them in advance of construction works.	One month prior to start of tunnelling, construction or other major work phases and re-issued if there are any significant changes	Signposts at Project locations Leaflets Community Liaison Officer to submit to relevant ministries, local authorities, and inspection authorities website: www.adjaristsqali.com	During the construction and implementation phases through communication exchange and public grievance mechanism
ES Commitments and Requirements for Contractor Knowledge and Implementation	On-going	Tender information Contracts Monthly EHS meetings Joint monitoring activities	During meetings
Project progress, performance on environmental and social issue management, and new activities	At least annually	Annual report Press releases Annual open days to visit Project Personal communication on specific issues for relevant stakeholders Community Liaison Officer Website: www.adjaristsqali.com	During the construction and implementation phases through communication exchange and public grievance mechanism
Public grievance mechanism	From the commencement of Project activities	Community Liaison Officer Website: www.adjaristsqali.com	Public can lodge grievances at any time throughout the lifecycle of the Project

6 Grievance mechanism and company contact information

A grievance can be defined as an actual or perceived problem that might give grounds for complaint. As a general policy, AGL will work proactively towards preventing grievances through the implementation of impact mitigation measures (as identified by the ESIA) and community liaison. These activities are designed to anticipate and address potential issues before they become grievances. This will be the responsibility of the Project Manager and the AGL Community Liaison Officer (CLO).

Anyone will be able to submit a grievance to the Project if they believe a practise is having a detrimental impact on the community, the environment, or on their quality of life. They may also submit comments and suggestions.

Any comments or concerns can be brought to the attention of the company verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on the Project website (www.adjaristsqali.com) alongside a description of the grievance mechanism. Grievance forms can then be submitted to the company representative whose contact details are provided below.

All grievances will be **acknowledged within 5 days**. If immediate corrective action is available it will be taken with 5 days; if no immediate corrective action is available, a **response will be provided within 10 days**. The response to a comment will be provided within twenty working days, unless there are exceptional circumstances.

Grievances during construction will be categorised based on validity and risk level by AGL and their CLO. Where investigations are required, project staff and outside authorities as appropriate, will assist with the process. The CLO will collaborate with the AGL to identify an appropriate investigation team with the correct skills to review the issue raised and to decide whether it is Project related or whether it is more appropriately addressed by a relevant authority outside the Project.

The CLO will explain in writing (or where literacy is an issue orally) the manner in which the review was carried out, the results of the review, any changes to activities that will be undertaken to address the grievance and how the issue is being managed to meet appropriate environmental and social management systems and requirements.

Grievance information will be recorded in a grievance log. This information will include:

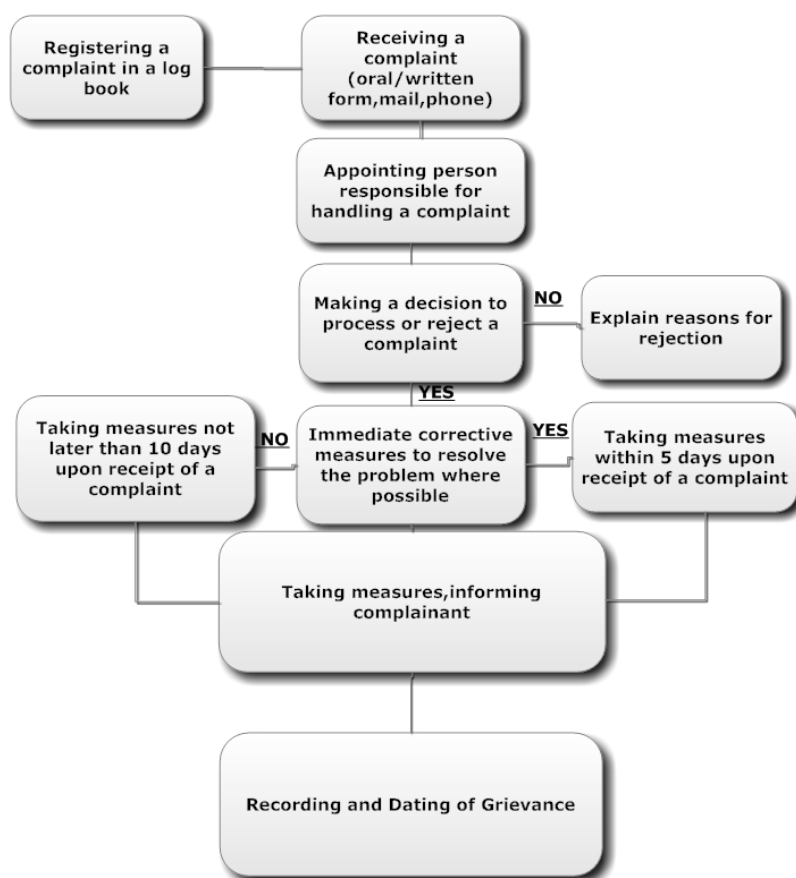
- Stakeholder name and contact details
- Details of the nature of the grievance
- Date recieved, responded to and closed out
- How it was submitted, acknowledged, responded to and closed out.

Individuals do not have to give their name, and also can request their name be kept confidential. AGL cannot communicate responses to anonymous grievances.

It is important to note that this mechanism does not take the place of legal rights that people have. Even if a person submits a grievance, he or she may use other legal avenues to achieve their goals.

A separate grievance mechanism will be available for Project employees and non-employee workers and this is not detailed in this SEP. The grievance mechanism to be used is depicted in Figure 6.1 below

Figure 6.1: Grievance Mechanism



During the planning phase of the project AGL has nominated **Peter Rae as the CLO** whose primary role is to be the point of contact for grievances and comments. As the project progress, AGL may nominate additional CLOs to act as points of contact within relevant municipalities. Grievances and comments should be sent to the address below, where possible by using the Grievance and Information Request Form provided in Appendix C.

Name: Peter Rae

Address: 6, Irakli Abashidze Street; Batumi 6010; Georgia

E-mail: info@adjaristsqali.com

Website: www.adjaristsqali.com

7 Monitoring and reporting

This SEP identifies various activities that require monitoring and reporting including the following:

- The updating of the SEP.
- CLO activities: minutes of consultation meetings will be produced and all original written consultation correspondence will be retained as evidence of the process and outcomes.
- Grievance logging and tracking: each grievance will be logged by the CLO, given an identification number and followed through by recording details and timing for their resolution and closing out.
- Annual reporting: a Project specific annual report summarising project performance, CLO activities including grievances and updates to the SEP will be produced.

Public domain documents will be distributed widely to stakeholders including regulatory agencies, project financiers, NGOs, local authorities, and local communities.

As part of the ESIA, an Environmental and Social Management and Monitoring Plan will detail specific monitoring and reporting requirements for environmental and social project performance.

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Appendix A. Initial project disclosure attendee list

No.	Name	Municipality	Position
1	Nodar Tavartkiladze	Khulo	Head of Sakrebulo (Council)
2	Temur Bolkvadze	Khulo	Gamgebeli(chief executive of municipality)
3	Irakli Baramidze	Keda	Gamgebeli (chief executive of municipality)
4	Temur Dumbadze	Khelvachauri	Gamgebeli (chief executive of municipality)
5	Nugzar amaglobeli	Shuakhevi	Gamgebeli (chief executive of municipality)
6	Malkhaz Partenadze	Khelvachauri	Head of Sakrebulo (Council)
7	Badri Diasamidze	Keda	Head of Sakrebulo (Council)
8	Naira Oniani	Khulo	Head of administration of governanace
9	Khatuna Abuladze	Khulo	Deputy gamgebeli (chief executive of municipality)
10	Ruslan Abuladze	Khulo	Head of infrastructure commission of Sakrebulo (Council)
11	Dato Chelidze	Khulo	Deputy Head of Sartebulo (Council)
12	Revaz Mikeladze	Batumi	Deputi Head of Forestry Department of Adjara
13	Mevlud Jurkvadze	Shuakhevi	Deputy Head of Sakrebulo (Council)
14	Emzar Abuladze	Khulo	Head of Financial Commission of Sakrebulo (Council)
15	Malkhaz Katamadze	Khulo	Assistant to Gamgebeli (chief executive of municipality)
16	Vazha Tsetskhladze	Khulo	Head ofJuridical Departmnt of Gamgeoba (local administration)
17	Rusudan Dzirkvadze	Khulo	Head of Social Affairs Commission of Saskrebulo (Council)
18	Raul Abuladze	Batumi	Head of Department, Ministry of Finances and Economy of Adjara
19	Ekaterine Varshalomidze	Batumi	Head of Department for International Economical Relations, Ministry of Finances can Economy of Adjara
20	Abesalom Gurgendze	Batumi	Deputy Minister, Ministry of Finances can Economy of Adjara

Appendix B. ESIA stakeholder engagement requirements

The ESIA identifies the likely environmental and social effects associated with the proposed hydropower cascade scheme. As part of the ESIA process, the following activities relevant to public disclosure and consultation are planned to meet international and national requirements:

- ESIA Scoping Disclosure and Consultation:
 - a. Scoping Report and Scoping Leaflet:
 - The stakeholders identified in Section 4 will be informed that the Scoping Report has been completed and will be available on the Project website;
 - The Scoping document will be made available in full on the projects website in English and Scoping leaflet in Georgian; and
 - Copies of the Georgian scoping leaflet will be made available at each of the municipalities within the project area and made available for review and comment prior to stakeholder workshops.
 - b. Scoping consultation events: these present the scoping phase findings and the proposed ESIA approach and focus before commencing the detailed study. Scoping report findings will be presented in a non-technical way in Georgian with all stakeholders invited and encouraged to ask questions and comment.
 - Formal Scoping Consultation Event: four consultation events will be held, one in each of the four municipalities over a period of two days, which will be conducted in Georgian;
 - Community Scoping Consultation Event: in addition to meetings at the local municipalities, members of the ESIA team will also visit villages within the municipalities within those two days to ensure disclosure of the project to a wider audience.
 - The consultation events will be publicised in the local newspapers as well as by contacting village community leaders, and through display of posters in the area,. This will be publicised locally by AGL through local media and municipality one week before the event to invite people to attend;
 - NGO consultation: Copies of the scoping document will be sent together with a letter of introduction to Green Alternative and Green Movement to foster early participation during the project planning phase. It is proposed to have an initial meeting with these groups in early September.
- Engagement during detailed ESIA study: private meetings, interview, focus group meetings
- Draft ESIA Disclosure and Consultation:
 - a. Notification of project and ESIA disclosure in relevant regional and national newspapers a minimum of one week before the ESIA is published.
 - b. Submission of draft ESIA, Technical Summary, and Report on “maximum permissible levels of pollutants discharged into the surface water bodies together with effluents” to Ministry of Environment as required by Georgian law.
 - c. Publication of draft ESIA non-technical summary in English and Georgian for a minimum of 50 days.
 - d. At least four public consultation workshops in administrative centres of municipalities within the project area held to discuss the project and the draft ESIA report, providing an opportunity for stakeholders to comment on the report before it is finalised.
 - e. ESIA consultation activities will be fed back to the ESIA technical specialists and reported in the ESIA report produced in Georgian and English. The non-technical summary will be provided in

Georgian, for distribution to stakeholders in hard copy and published in full on the project website.

- Media Communications and Disclosure of Written Information. In accordance with national regulations, the project will be advertised in regional newspapers and national newspaper one week prior to publication of the draft ESIA. The advertisement must contain information related to the title, location, place, and timescales of the proposed project activities. The permit application/issuance procedure, including ESIA coordination and establishment of the timeframes for information disclosure and discussion under Georgian Law, includes the following steps:
 - Within one week of publishing the information in the newspaper, the developer must submit an EIA report (both as a paper copy and in electronic format) to the administrative bodies. Within 45 days after publishing the information, the developer has to review comments obtained from the public. Not earlier than within 50 days and not later than 60 days after publishing the information, the developer must organize the public consultation process. At least one meeting must be conducted in the administrative centre of the area where the activity is planned. The developer is required to provide minutes signed by the relevant authorities present at the meeting within five days.
 - All comments received are to be reviewed and where possible considered in the final version of the EIA report. Where it is not possible to address comments within the Final EIA, the developer must explain the reasons for that in writing to the author(s) of the comments. These letters, together with the minutes of the meeting and the final EIA report, are then submitted to the Ministry of Environment Protection and Natural Resources (MoE) (or in case when a Construction Permit is required, to the relevant competent authority) for consideration.

Appendix C. Public grievance leaflet

AGL is striving to ensure that the construction and operation of the Project will not result in adverse impacts for those living near to its project site or for other potentially affected stakeholders. However, should there be any issues we would like to hear about any concerns or grievances or comments and suggestions that you may have in relation to the project activities.

What kind of grievance can I lodge?

Anyone can lodge a grievance if they feel that project activities are negatively affecting them, their community or their local environment. Example of grievances could include, but are not limited to:

- Mishandling of the land acquisition process (pre-construction);
- Noise of construction works (construction);
- Damage to private and common assets and properties;
- Community health and safety, for instance in relation to impacts of increased traffic (construction);
- Reduced availability of water for irrigation and watermills;
- Practices that endanger the health, safety and security of employees working on the project; and
- Failure to meet the labour rights of employees working on the project.

Comments and information requests will also be accepted; these may be recorded in the same way as grievances and will be answered to the best of the ability of AGL.

How can I submit a grievance?

Anyone can submit a grievance to the CLO in the following ways:

- a. By phone to: +995 (8) 99715125
- b. By email on: info@adjaristsqali.com
- c. In person by completing the attached Grievance and Information Request Form and posting it to / dropping off at the following address: Nino Diasamidze; Address 6 , Irakli Abashidze Street Batumi 6010;Georgia

Alternatively drop boxes will be set up during the construction phase at each of the local municipalities affected by the project. These will be emptied at least once a week and reviewed.

How will AGL deal with my grievance?

AGL will go through the following steps to deal with your grievance:

Step 1: Acknowledgement: AGL will contact you to acknowledge your grievance and request within the following timescales:

- From 5 to 10 business days for a grievance depending on the issue.
- Immediately acknowledge and record a verbal complaint and within 5 to 10 business days for a written complaint.
- Comments may take longer to process and response to comments will be completed within 20 working days depending on the issue.

This acknowledgement will include your grievance reference number, the person at AGL responsible for tracking your grievance and their contact details and the expected a date for completing the investigation into your grievance (where appropriate).

Step 2: Investigation: AGL will then set up an investigation into your grievance. They may need to contact you during this investigation for further information.

Step 3 Resolution: once your grievance has been investigated you will be contacted with the findings and AGL's proposed response. If the investigations find that the grievance does not relate to the projects activities or that AGL is working within the relevant Georgian and international standards in relation to grievance we will explain this in writing to you.

Step 4 Follow Up: AGL may contact you at a later stage to check our activities pose no further problems.

Confidentiality: if you would like your grievance to remain confidential. AGL will ensure that your name and contact details are not disclosed without your consent and only the AGL team directly working on the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

Public Grievance and Information Request Form

Reference Number (to be filled by AGL):

Contact Details

Name:

Address:

Telephone:

Email:

Please state whether you wish for your details to remain confidential:

[Note that we may need to contact you regarding your grievance but will not share your details with a third party without your permission.]

How would you prefer

By Post

By Phone

By E-mail

To be contacted?

Please tick a box

Name and identification information (from the identity card). [this field is not mandatory]

COMMENTS

Please provide your comment.

If this comment needs a resolution, what is your suggested resolution?

GRIEVANCES

Please provide details of your grievance, include description of the problem, who it happened to, when, where and how many times, as relevant.

What is your suggested resolution for the grievance, if you have one?

How to submit this form to AGL

By post to:

6 Iraki Abashidze Street;
Batumi 6010;
Georgia

By hand:

6 Iraki Abashidze Street;
Batumi 6010;
Georgia

by e-mail: please email your grievance, suggested resolution and preferred contact details to:

info@adjaristsqali.com

Signature	Date
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