

Corporate Safeguards Audit Report

July 2020

Georgia: Georgian Water Project

Prepared by ERM Environmental Resources Management SRL (ERM Romania) for the Asian Development Bank.

This corporate safeguards audit report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature. Your attention is directed to the "Terms of Use" section of this website.

In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.



Environmental and Social Gap Analysis Report

Corporate Environmental and Social
Management System of the Georgia Global
Utilities JSC and Georgian Water & Power
Subproject Audit

9 July 2020

Project No.: 0558790

Document details	The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.
Document title	Environmental and Social Gap Analysis Report
Document subtitle	Corporate Environmental and Social Management System of the Georgia Global Utilities JSC and Georgian Water & Power Subproject Audit
Project No.	0558790
Date	9 July 2020
Version	1.2
Author	ERM
Company Name	Georgia Global Utilities JSC

Document history

Version	Revision	Author	Reviewed by	ERM approval to issue		Comments
				Name	Date	
Draft	1.0	ERM	Iulia Luta	Elena-Daniela Afrenie	22 June 2020	Draft to Company and ADB
Final	1.1	ERM	Iulia Luta	Elena-Daniela Afrenie	3 rd July 2020	Final to Company and ADB
Final	1.2	ERM	Iulia Luta	Elena-Daniela Afrenie	9 July 2020	Final, addressing second round of comments, to Company and ADB

9 July 2020

Environmental and Social Gap Analysis Report

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit



Elena-Daniela Afrenie
Romania & Poland Country Manager



Iulia Luta
Project Manager

ERM Environmental Resources Management SRL (ERM Romania)
145 Calea Victoriei, 8th floor Victoria Center, District #1, 010072
Bucharest, Romania

© Copyright 2020 by ERM Worldwide Group Ltd and/or its affiliates ("ERM").
All rights reserved. No part of this work may be reproduced or transmitted in any form,
or by any means, without the prior written permission of ERM.

TABLE OF CONTENTS

Signature Page	3
TABLE OF CONTENTS	I
List of Tables	i
List of Figures	i
Acronyms and Abbreviations	ii
1. EXECUTIVE SUMMARY	1
2. INTRODUCTION	4
2.1 Background.....	4
2.2 Applicable Standards	4
2.3 Limitations.....	5
3. DESCRIPTION OF THE COMPANY, ITS OPERATIONS AND ACTIVITIES	6
3.1 Overview of the GGU structure.....	6
3.2 Overview of the subproject covered by the E&S Assessment	7
3.2.1 Water supply system.....	7
3.2.2 Wastewater collection system.....	1
3.2.3 Description of the activities under ADB use of proceeds	1
4. OVERVIEW OF THE APPROACH AND METHODOLOGY FOR THE GAP ANALYSES	4
4.1 Desktop Review	4
4.2 Virtual Management Interviews.....	4
4.3 Reporting	7
5. E&S GAP ANALYSES FINDINGS	8
5.1 Commentary on eligibility of the Project for ADB Funding	8
5.2 ADB Project Categorization	8
5.3 Reputational risk assessment	9
5.4 Presentation of E&S Findings	10
5.4.1 Environmental and Social Assessment and Management	10
5.4.2 Labour and working conditions	26
5.4.3 Health and Safety	27
5.4.4 Involuntary Resettlement	34
5.4.5 Biodiversity Conservation and Sustainable Natural Resource Management	36
5.4.6 Indigenous peoples.....	36
5.4.7 Physical Cultural Resources	37
5.5 E&S Gaps Identified	37
APPENDIX A LIST OF DOCUMENTS REVIEWED	18
APPENDIX B EXTERNAL FACTORS REVIEW	47

List of Tables

Table 5-1	ADB Project Categories relevant for the assessed renewable assets	8
Table 5-2	ADB Project Categorisation	9
Table 5-3	E&S Findings Table	1

List of Figures

Figure 3-1	Water production and release scheme	1
------------	---	---

Figure 5-1	GGU ESMS structure.....	11
Figure 5-2	GGU Management Organisation	13
Figure 5-3	GGU Technical Department Organisation	15
Figure 5-4	E&S Management Staffing.....	16
Figure 5-5	GGU Covid 19 response.....	34

Acronyms and Abbreviations

Name	Description
ADB	Asian Development Bank
CAP	Corrective Action Plan
CLS	Core Labour Standards
EDFIs	European Development Finance Institutions
EFR	External Factors Review
EHS	Environmental, Health and Safety
E&S	Environmental & Social
ESMS	Environmental and Social Management System
GGU	Georgia Global Utilities
GWP	Georgian Water and Power
HPP	Hydropower project
HS	Health & Safety
ILO	International Labour Organisation
km	Kilometre
kV	Kilovolt
MW	Megawatt
SPS	Safeguard Policy Statement
ToR	Terms of Reference
WF	Wind Farm

1. EXECUTIVE SUMMARY

Environmental and Social Assessment and Management and Health and Safety

The parent company GGU has adopted Policies addressing environmental, social, health and safety and labour aspects and implemented a number of E&S plans and procedures which are supported by a number of topic-specific management plans.

The GGU ESMS comprises generic high level documents defining requirements applicable to the management of each of the E&S aspects addressed. These documents require the development and implementation of site-specific management plans by Construction Contractors and indicate requirements for development and implementation of topic-specific management plans by GWP in relation to water and wastewater network operations.

GGU's ESMS for operations is based on a management system aligned with good international practice. GGU has not yet obtained the relevant ISO certifications. GWP's management system, however, is certified to ISO 9001 (Quality) and ISO 14001 (Environmental) Management Standards.

A H&S risk management system is in place and supported by a set of management plans and instructions addressing required H&S aspects. GWP collects accident and near miss statistics regularly, however these statistics are disaggregated when reported to the corporate level. Thus, incident statistics related to GWP's subassets and operations are not easily extracted from corporate statistics. While the management system in place is overall adequate, recurrence of trench excavation-related incidents suggests that enforcement of associated procedures in place could be improved.

GWP has identified and prioritized risky¹ sections of their network where faults in the water delivery line or sewage line have the potential to induce flooding and / or damage infrastructure or agricultural land that may result in impacts on community health, injuries, and impacts to mental wellbeing from property loss, propagation of infectious diseases. GWP will develop a risk assessment and register to identify the temporary actions required to be taken whilst rehabilitation works are being arranged to limit potential negative impacts on the community.

Stakeholder Engagement

Responsibilities for external stakeholder engagement, information disclosure and grievance management are defined both at GGU's Corporate level and at subproject level within GWP. Staff that take on the role of community liaison (in full or shared with other responsibilities) are present locally at the assets under GGU and report to the Corporate E&S Division of GGU. Training on stakeholder engagement and grievance management is delivered to staff at Corporate level but the training needs to be extended to staff at asset level as well as to contractors and subcontractors that GGU and GWP engage for the different types of works.

There is a generic Stakeholder Engagement Procedure defined under the GGU ESMS, which is high-level and refers to the 2017 GGU Stakeholder Engagement Plan (SEP), which is developed as a separate document, as part of GGU's management system. Considering the recent expansion of the assets under GGU and changes in the local regulatory requirements pertaining to information disclosure and consultation, the Corporate SEP will need to be updated. It is recommended that once the Corporate SEP is amended, the Stakeholder Engagement Procedure defined under the GGU ESMS, should also be amended.

GWP does not have a separate and specific SEP as the group uses GGU's SEP. It is necessary that GWP develop a SEP specific its operations that will define a detailed Engagement Action Plan, and commitments around disclosure of information, reporting to communities, grievance management and record keeping.

¹ These are the sites where the existing old network system needs to be rehabilitated before the other sections due to the potential leakage and failure risks.

An External Grievance Management procedure needs to be developed under the GGU ESMS for implementation at each asset. It is noted that GWP already has a robust system in place to receive external grievances. However, this system will need to be enhanced to include a register that details how grievances are managed, the timelines within which they are addressed, and the responsible departments. This procedure should be consistent with the External Grievance Management procedure to be developed under GGU ESMS.

Labour and Working Conditions

GGU has a mature Human Resources Department that services all GGU assets, including GWP. GGU's human resources policy framework, including GWP's Internal Relations document, aligns with Georgian law, but fails to explicitly commit to the prohibition of child and forced labour, which is required for ADB Core Labour Standard compliance. GGU is committed to diversity and tracks the ethnicity and gender of their workforce and is developing an Anti-Sexual Harassment Policy. GGU has a formal employee grievance procedure that allows for anonymous submissions and is accessible to all GGU employees, including GWP. This procedure includes a log that tracks each received grievance, however, it does not set out timelines for acknowledging, investigating, and closing out grievances. This process is not communicated to on-site contractors. GGU's Contractor Management Plan governs interactions with contracted workers, and monitors their health and safety performance, but not other labour and working condition issues. In order to comply with ADB's requirements, GGU needs to ensure that their contractors comply with all the ILO Core Labour Standards.

Involuntary Resettlement

GGU representatives reported that the company is committed to not resorting to expropriation under any circumstances although this remains an option under Georgian laws and regulations in case any of the projects would be considered of national interest. Although their commitment is very firm, GGU has expropriation as a fall back if negotiations fail, which constitutes involuntary resettlement as per ADB SPS 2 (DB SR2 Section 4. Para 25).

Neither GGU nor GWP have a formal procedure to screen for or guide activities with regard to the temporary or permanent acquisition of land, including definition of the processes for assessing and compensating for loss of land and livelihoods.

The land access for rehabilitation works is managed by the Municipality. GWP reports rehabilitation priorities and it is the Municipality who plans and coordinates all the different utility companies. In line with Georgian laws and regulations, no compensation is foreseen in relation to such rehabilitation works.

It is recommended for GWP develop a procedure for involuntary resettlement screening and Land Acquisition and Compensation in alignment with ADB SPS SR2.

Biodiversity Conservation and Sustainable Natural Resource Management

GGU does not have a strategic approach to biodiversity, in terms of overarching policies on key biodiversity issues such as biodiversity risk assessment and management, no net loss and net gain, invasive non-native species, and monitoring programmes and protocols.

The network infrastructure of the GWP subproject components overlap the area of Tbilisi, the capital of Georgia, and neighbouring villages. Therefore, the GWP subproject components are located in modified habitat and highly modified habitat (i.e. constructed land), having low biodiversity value.

Project operation activities related to the network infrastructure do not overlap any legally protected areas. Environmental Impact Assessments have not been undertaken for the GWP subproject components, as this was not required by the Georgian law. There is no biodiversity monitoring in place for the infrastructure network and it is considered that there are minimal or no adverse impacts on environmentally sensitive areas related to the proposed network maintenance activities.

Indigenous Peoples

ADB SPS SR3 has been deemed not applicable because the GWP activities to be financed by ADB, are located within Tbilisi and neighbouring areas, in an urban environment, and Tbilisi does not have any vulnerable communities of Indigenous Peoples or ethnic minorities.

However, neither GGU nor GWP have a formal procedure to screen for or guide activities with regard to Indigenous Peoples.

Physical Cultural Resources

In reviewing the approach taken to assessing the impact to the Physical Cultural Resources, GGU have complied with Georgian Cultural Heritage laws and requirements for all construction projects, and necessary permits have been obtained.

However, for some assets where an EIA has been produced, adequate surveys by cultural heritage specialists were not undertaken. In some instances, when archaeological investigations have taken place, the information was not incorporated into the EIAs.

It is recommended that GGU produce a Cultural Heritage Management Plan and a Chance Finds procedure that can be implemented by future projects. Similarly, GWP does not have procedures in place that can assist with the identification and conservation of physical cultural resources. As such, for the proposed network maintenance activities, a Chance Finds Procedure will need to be developed.

Reputational Risk Review

The review performed in the frame of this assignment identified the following:

- A lawsuit was filed by two families against Tbilisi City Hall and GWP following the drowning deaths of young family members in an area of the Tbilisi reservoir called waterfall. The lawsuit is ongoing at the Appeal Court and includes a claim in amount of 30,000 USD (to be split between the City Hall and GWP in case of success). The first court passed a resolution in favour of Municipality and GWP. Any related liabilities for the company are considered unlikely given that the area where the incident occurred is not under GWP administration.
- Multiple references pertaining to the opposition (by local Svan community in particular and by wider public in general) of communities to hydropower developments in the Svaneti region were reported, with the Mestiachala HPPs being mentioned in this context. However, the opposition does not seem targeted against Mestiachala HPPs in particular but rather towards the development of larger scale HPPs and future hydropower developments in the particular region.

This review did not identify any aspects with potential significant reputational risk for GGU.

2. INTRODUCTION

2.1 Background

Georgia Global Utilities (GGU or *the Company*), 100% subsidiary of Georgia Capital PLC has contracted ERM to undertake an Environmental and Social (E&S) Due Diligence of the Company's operations, including a Subproject-level E&S Assessment of the Georgian Water and Power LLC (GWP) (largest asset of GGU and Subproject of the ADB financing) activities, which the Asian Development Bank (ADB) intends to finance. In this context, ADB's use of proceeds includes capital expenditures of water utility business for the maintenance, rehabilitation and repair of existing water supply network.

The scope of work undertaken by ERM is hereinafter referred to as the E&S assessment and comprises the findings of the:

- audit of the GGU Environmental and Social Management System (ESMS); and
- the GWP subproject audit consisting in the assessment of how GGU ESMS is cascaded to GWP-level in relation to the activities to be financed by ADB.

GGU manages the commissioned assets of renewable energy and water utility businesses of Georgia Capital. Both business lines are fully owned by Georgia Capital, with no minority interest.

This report represents the E&S Gap Analyses report prepared by ERM following the review of the GGU Corporate Environmental and Social Management System (ESMS) and the Subproject audit against the Applicable Standards (see Section 0 below). This report is supplemented by a Corrective Action Plan (CAP), which is developed as a standalone document, and includes the required actions to achieve alignment with the requirements of the Applicable Standards.

2.2 Applicable Standards

ERM has undertaken the E&S assessment in line with the requirements of the following 'Applicable Standards':

- Applicable local, national² and international environmental and social (including occupational health and safety) legislation;
- Asian Development Bank (ADB) Safeguard Policy Statement (SPS), 2009;
- ADB Social Protection Strategy (2001);
- ADB Gender and Development Policy, 1998;
- ADB Access to Information Policy, 2019;
- International Labour Organisation (ILO) conventions covering core labour standards³ and the basic terms and conditions of employment⁴;
- World Bank Group General Environmental, Health and Safety (EHS) Guidelines, April 2007; and
- World Bank Group EHS Guidelines for Water and Sanitation.

² This includes key E&S permits and approvals required under national legislation.

³ The requirements as applicable on child and forced labour, discrimination and freedom of association and collective bargaining, stemming from the ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and covering: (a) freedom of association and the right to collective bargaining, (b) the elimination of forced and compulsory labour, (c) the abolition of child labour, and (d) the elimination of discrimination in the workplace.

⁴ The requirements as applicable on wage, working hours, labour contract and occupational health & safety issues, stemming from ILO conventions 26 and 131 (on remuneration), 1 (on working hours), 155 (on health & safety) and recommendations.

2.3 Limitations

This document has been prepared by ERM with all reasonable skills, care and diligence within the terms of the contract with the Company, incorporating ERM's General Terms and Conditions of Business, as agreed upon with the Company and taking account of the manpower and resources devoted to it by agreement with the Company. The Report cannot, and makes no attempt to, anticipate all changes to those conditions and circumstances, and/or changes to the Project or regulations, which occur after its date of document review. ERM disclaims any responsibility to the Company or any other party for use of the Report for any purpose other than that for which it was specifically prepared.

This document is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based on the currently available facts within the limits of the existing data, scope of work, budget and schedule.

To the extent that more definitive conclusions are desired by the Company than are warranted by the currently available facts, it is specifically ERM's intent that the conclusions stated herein are intended as guidance and not necessarily as a firm course of action, except where explicitly stated as such. Other than warranting that it has exercised the skill, care and diligence referred to above, ERM makes no representations or warranties, expressed or implied, including, without limitation, representations or warranties as to merchantability or fitness for a particular purpose. In addition, the information provided in this Report is not to be construed as legal advice.

ERM points out that the findings and conclusions by ERM in this E&S Assessment are predominantly based on written and verbal information provided by third parties, mainly by the Company and their legal and technical consultants, which ERM assumes to be accurate. ERM has only to a limited extent been able to validate such information first hand, e.g. via crosschecking with document reviews. As such, ERM makes no warranties or representations with respect to such information.

This report has been prepared for the use of the Company and its advisors and agents, as well as the additional specified recipients of this Report. Other parties may only rely on this Report pursuant to a written Reliance Agreement with ERM and subject to the same contractual conditions as the Company. Nothing contained in this Report shall be construed as a warranty or affirmation by ERM that property described in the Report are suitable collateral for any loan, or that acquisition of such property by any lender through foreclosure proceedings or otherwise will not expose the lender to potential environmental or other liability.

Specific limitations of the Assignment include:

- This E&S assessment has been conducted primarily as a desktop exercise, through a combination of document review and management interview activities.⁵
- No virtual meetings with external stakeholders of the Company have been held by ERM as part of this assignment. Limited discussions with stakeholders (Community members around Mestiachala 1&2 and Kasleti HPPs, which are outside the scope of the E&S Assessment) were exclusively conducted in local language by DG Consulting Ltd. (as part of the site visit conducted – see Section **Error! Reference source not found.**). These meetings were organised by the Company and were not attended by ERM due to the COVID 19 medical restrictions. These meetings did not include consultation of GWP stakeholders. However, the content of these discussions has been reviewed for the purpose of the assessing the implementation of GGU's existing ESMS at the asset level and for the assessment of reputational risks (see Section 5.3).

⁵ Site visits and discussions with some stakeholders were held for a sample of GGU assets by a subcontractor (DG Consulting Ltd.), to enable ERM to assess the implementation of GGUs ESMS at the asset level.

- ERM has reviewed and assessed the current Environmental and Social Management System (ESMS) of GGU, including the existing policies and procedures. This ESMS is also applicable to GWP.
- Dam safety assessment has not been included in the scope of this E&S Assessment.
- The activities to be funded by ADB will be conducted in the urban area of Tbilisi, which does not have any vulnerable communities of Indigenous Peoples or ethnic minorities. Consequently, the Terms of Reference (ToR) shared by the Company at the proposal phase excluded Indigenous People impacts and therefore this is not included in ERM's scope of assessment. However, ERM has noted that GGU's ESMS does not contain reference to Indigenous Peoples and has also raised, in this report, some external factors / issues related to Svan ethnic identity and protests against hydropower projects in the Svaneti Region of Georgia.
- The assessment of land acquisition topics has been limited to understanding practices that GWP uses with regard to acquisition of land for ADB-funded activities and the identification of any processes in place to manage compensation for potential displacement impacts.
- ERM has relied on the information provided to us by or on behalf of the Company as being accurate and complete, and to the extent that it is not, ERM is liable to the Company or any other party.
- ERM has not independently verified or certified data provided for undertaking this assignment.
- The output of the virtual management interviews has been reflected in the Gap Analysis Report. No separate interview minutes of meetings have been developed.
- The requirements considered within this review are lacking some specific guidance for water companies (e.g. water utility business operated by GWP, largest asset of GGU) on how to undertake climate change risk assessments.
- The availability of adequate site-specific E&S management plans for each and every site could not be confirmed in the frame of this assignment.
- Based on the information provided, ERM cannot assess whether wages meet legal requirements. Furthermore, an assessment whether wages meet legal limits cannot be achieved without a site visit to include a wide sample of contracts chosen by ERM. However, the Company has confirmed that wages meet legal requirements.

3. DESCRIPTION OF THE COMPANY, ITS OPERATIONS AND ACTIVITIES

This section provides a brief overview of the assets that are included in the scope of the E&S Assessment.

3.1 Overview of the GGU structure

The Group owner is Georgia Capital PLC, a London Stock Exchange-listed company and Georgia's only investment platform. It covers various sectors – utilities (energy), education institutions, healthcare units, production of beverages and it institutionally-owned, meaning that it does not have a single shareholder. It is owned by several funds, the largest share owned not exceeding 7.5%.

Georgia Capital JSC is a Georgian entity that holds 100% of Georgia Global Utilities JSC (GGU). GGU manages the renewable energy and water utility businesses of Georgia Capital. Both business lines are fully owned by Georgia Capital, with no minority interest. GGU owns the following entities:

- Svaneti Hydro JSC, the shareholder for Mestichala 1&2;
- QWF LLC (Qartli WF);

- Hydrolea LLC (which consists of several entities: Hydrogeorgia LLC, Kasleti 2 LLC, Geoenergy LLC, Darchi LLC);
- Georgian Energy Trading Company LLC (in charge of power supply contracts with third parties);
- Georgian Water and Power LLC:
 - holds natural monopoly in water utility services, the largest subsidiary of GGU that supplies water to Tbilisi inhabitants (approximately 1.2 million);
 - holds three main assets: Zhinvali HPP (130MW), Tetríkhevi HPP (12.4MW), Bodorna HPP (2.5MW);
 - intends to reduce own consumption of electricity to increase the share of produced electricity which is sold on the market;
 - has an operating cycle consisting of two main phases:
 - production: water production (river water intake/wells/infiltration basins; 4,000-km network), and water treatment, transportation and dispatch – 5 treatment plants, 2,000-km network (3 of which work with natural filtration, while the other 2 are modern and feature sedimentation tanks, filters and chlorination systems) / over 45 pumping stations / over 100 reservoirs;
 - distribution: water distribution and sales – the Tbilisi network is managed by 5 business centres;
- Mtskheta Water LLC (MWC) and Rustavi Water LLC (RWC) – small utility companies, active in the vicinity of Tbilisi;
- Gardabani Sewage Treatment Plant LLC, which treats water collected from the utility companies;
- Saguramo Energy LLC – hydropower plant;
- Georgian Engineering Management Company LLC – largely inactive at present.

3.2 Overview of the subproject covered by the E&S Assessment

GGU's water supply and sanitation services business, run through the GWP, is a natural monopoly in the capital city of Tbilisi and the surrounding area, including the cities of Rustavi and Mtskheta (separate legal entities under GGU), supplying these areas with potable water. The customer base for this business includes both business and residential customers.

GWP operates approximately three thousand kilometers of water pipeline network (trunk lines, tunnels of potable water and aqueducts, distribution networks to customers).

3.2.1 Water supply system

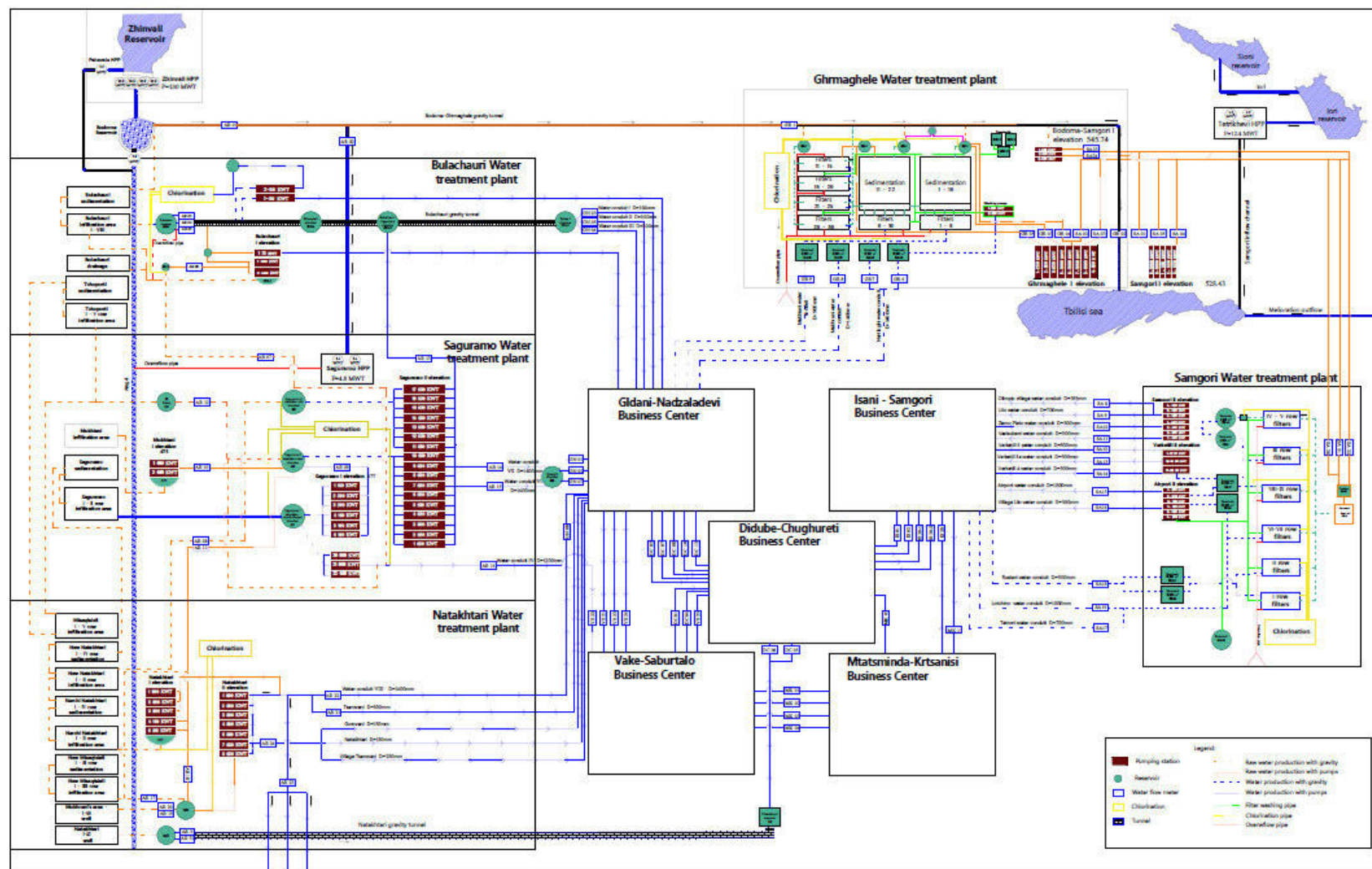
The core activities of GWP are:

- intake of raw water, treatment and supply of potable water;
- wastewater collection and processing;
- generation and sale of electric power.

Water sales is the most significant stream of revenue for the Company. The water is sourced from Zhinvali reservoir and Mukhrani/Natakhtari aquifer.

The GWP water production and release scheme is represented in *Figure 3-1* provided overleaf.

Figure 3-1 Water production and release scheme



Source: GGU, June 2020

Almost all produced raw water originates from the nearby Aragvi valley. Secondary source of water is the Tbilisi reservoir which is a buffer reservoir.

Key features of the water supply system:

- Reservoirs Capacity:
 - Bodoma 1.0 million m³;
 - Zhinvali 400 million m³;
 - Tbilisi (sea) reservoir 308 million m³.
- Water Conduits Capacity:
 - Bulachauri 3, 000 liter /sec;
 - Choporti 1,300 liter /sec;
 - Nataktari 1,300 liter /sec;
 - Natakhtari II 900 liter /sec;
 - Saguramo 3,000 liter /sec;
 - Mukhrani Artesian 1,225 liter /sec.

Surface water is treated in natural sand and gravel infiltration areas situated on extended land areas owned by the Company in the Aragvi valley, outside Tbilisi, and in two water treatment plants in Samgori and Grmaghele (5.0 l/sec capacity each). Some 520 milion m³ of potable water is supplied from water production/ treatment facilities in Bulachauri, Natakhtari, Saguramo, Samgori and Grmaghele on an annual basis.

Due to mountainous landscape of Tbilisi, the water distribution system has 5 elevation levels. In total, the company operates 45 pumping stations, 104 pure water tanks, with total capacity of approximately 300 thousand cubic meters.

3.2.2 Wastewater collection system

The wastewater received from the GGU customer base is discharged to the Gardabani Sewage Treatment Plant. The company operates approximately two thousand kilometres of wastewater pipeline network, of which the length of main trunk sewer is approximately 72 km.

3.2.3 Description of the activities under ADB use of proceeds

This section presents the processes that are undertaken for the maintenance, rehabilitation and repair of GWP's existing water supply network and the installation of new water connections to end users in Tbilisi and neighboring municipalities. The works will entail trenching of sections of the existing network, within established municipality-owned infrastructure in urban Tbilisi and in the surrounding municipalities.

Rehabilitation of existing water/wastewater network

The sequence of activities is as follows:

- Identification of amortized network by GWP Business Centers and input of this project in the CAPEX plan;
- Identification of detailed technical information of the project on the field by GWP Project Design, Business Center, Topo Geodesy and Hydro Modelling units;
- Preparation of graphic drawing and preliminary estimate of the project by GWP Project Design Department;

- Review of the project for approval by the GWP Investment Committee;
- Project graphic drawing agreement with all utility communication companies by GWP Project Management Department;
- Agreement on the implementation of the project by the City Hall by GWP Project Management Department; once the planned rehabilitation works are agreed with other utility companies and approved by the Municipality (City Hall), it is the Municipality who is in charge of informing the public which municipal areas will be rehabilitated;
- Agreement on the implementation of the project by the City Police by GWP Project Management Department;
- Announcing tender and identifying the winning company by GWP Project Committee;
- Procurement and planning by GWP Project Management Department;
- Review of the project and winning company by GWP Tender Committee;
- Signing a contract with tender winning company;
- Starting project according to the plan; prior to rehabilitation works, GWP also informs the affected consumers with regard to planned interruptions of supply within timelines that are regulated by the Georgian National Energy and Water Supply Regulatory Commission;
- Daily monitoring of the project by GWP Supervision Department, quality control and accounting of the volumes of spent materials and used facilities;
- Preparation of hidden works acts with pictures;
- Hydraulic testing, network washing and preparation of relevant acts;
- Preparation of drawing of the performed works;
- Preparation of Shape File by the Contractor and delivery to the GWP GIS Department;
- Inspection of the completed works by Project Management, Business Center, Supervision and Dispatching units and formation act of exploitation;
- Preparation of final settlement documents on construction works by the contractor and review for approval by GWP Supervision Department and formation act of acceptance;
- Reflection of the materials written on the project in Property Plant and Equipment by Accounting Department in Microsoft Dynamics Software;
- Preparation of project financial and technical analysis.

Installation of new water connections to end users

The sequence of activities is as follows:

- The applicant submits a request to the GWP service center to connect to the water and / or wastewater system;
- The applicant writes the application document according to the regulated rules of GNERC (regulator) and the internal procedure of the company;
- The application is reflected in the company's software system and GNERC's e-journal;
- Upon receipt of the application, a message is sent to the customer and the GNERC;
- The application for further processing is submitted to the New Connections Management unit, which will guide the process of fulfilling the customer's request for connection to the water and / or wastewater system;

- Upon receipt of the application, a new customer connection number will be generated in the billing system in response to the customer's application;
- GWP Business Center must determine within 10 working days whether it is possible to connect the citizen to the water supply system in a regulated manner. If it is not possible to connect a citizen to the water supply system in a regulated manner, then citizen must apply to GWP and request to be connected to the water and / or wastewater system in an unregulated manner; The process for regulated connection request continues as follows:
- Business center determines the connection point and issues technical assignment for Project Design Department;
- GWP Project Design Department prepares the new connection project;
- Project graphic drawing agreement with all utility communication companies by GWP New Connections Management unit;
- Agreement on the implementation of the project by the City Hall by GWP New Connections Management unit;
- Agreement on the implementation of the project by the City Police by GWP New Connections Management unit;
- New connection technical works are done by GWP Construction Department;
- Daily monitoring of the project by GWP Supervision Department, quality control and accounting of the volumes of spent materials and used facilities;
- Hydraulic testing, network washing and preparation of relevant acts;
- After the completion of the technical works, an electronic subscription act (act of acceptance) is formed between the customer and GWP.
- When forming an electronic act of acceptance, information about the customer's payments from the new connection billing system is automatically reflected in the act, according to the date. The act of acceptance is sent to the GNERC.
- After meter installation act of hallmark (stamp) is formed and water consumption is recorded.
- Preparation of drawing of the performed works by GWP Construction Department;
- Preparation of Shape File by GWP Construction Department and delivery to the GWP GIS Department;
- Inspection of the completed works by Business Center, Supervision and Construction Department units and formation act of exploitation;
- Reflection of the materials written on the project in Property Plant and Equipment by Accounting Department in Microsoft Dynamics Software.

The process for de-regulated connection request continues as follows:

- The applicant requests from GWP preparation of the project with estimate and the applicant receives these documents;
- The applicant can purchase project design documentation from GWP and order construction works to GWP or carry out construction work independently, under the supervision of GWP;
- All subsequent processes are the same as those followed for regular connections.

4. OVERVIEW OF THE APPROACH AND METHODOLOGY FOR THE GAP ANALYSES

The E&S assessment was conducted through a combination of the following activities:

- desktop review of information and documents provided by the Company;
- virtual interviews with relevant representatives of the Company;
- review of the site visit report developed by DG Consulting Ltd. in June 2020 with the purpose of identifying potential issues, as may have been raised by stakeholders consulted;
- research of public information on the Company's organisation and assets under GGU (External Factors Review).

4.1 Desktop Review

Following the kick-off call for the Assessment, ERM submitted a list of requested documents for review and these have been uploaded in a Virtual Data Room (Cloud).

ERM also performed a review of information in the public domain regarding the Company and its assets (including those not covered by this E&S assessment), with the objective of identifying and reporting on E&S-related issues which may be the subject of current interest and concern to third party stakeholders.

4.2 Virtual Management Interviews

In order to substantiate the understanding of the Corporate ESMS and the E&S aspects of the seven assets (six HPPs and one WF), gained during the desktop review, and in order to better understand related environmental and social issues, ERM held the following virtual (phone) interviews:

- Introductory Session (general overview of Company legal structure, assets and ESMS organisation), held on 16 June 2020, with:
 - Giorgi Vakhtangishvili – Chief Executive Officer, GGU Group;
 - Luka Chachibaia – Technical Director, GGU Group;
 - Nino Sul Khanishvili – Environmental & Social Officer GGU Group;
 - Zurab Gordeziani - Head of Energy, GGU Group;
 - Irakli Babukhadia - Head of Water Business, GGU Group;
 - Jaba Mamulashvili - Chief Legal Officer;
 - Zurab Alpaidze - Chief Technical Officer Georgian Water and Power;
 - Gaga Tkemaladze – Health & Safety Manager GGU Group;
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);
 - Tina Simonishvili – Head of International Relations and Funding, GGU Group;
 - Ana Akubardia - International Relations and Funding, GGU Group;
- Environmental Session held on 16 June 2020, with:
 - Luka Chachibaia – Technical Director, GGU Group;
 - Gaga Tkemaladze – Health & Safety Manager GGU Group;
 - Nino Sul Khanishvili – Environmental & Social Officer GGU Group;
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);

- Tina Simonishvili – Head of International Relations and Funding, GGU Group;
- Ana Akubardia - International Relations and Funding, GGU Group;
- Zurab Alpaidze - Chief Technical Officer Georgian Water and Power;
- Tina Simonishvili – Head of International Relations GGU Group;
- Koba Ratiani – Project Engineer;
- Social Session #1 held on 16 June 2020, with:
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);
 - Luka Chachibaia – Technical Director, GGU Group;
 - Nino Sulkhanishvili – Environmental & Social Officer GGU Group;
 - Koba Ratiani – Project Engineer;
- Social Session #2 held on 17 June 2020, with:
 - Irakli Babukhadia - Head of Water Business, GGU Group;
 - Joseph Natroshvili – current Director of Darchi LLC and former Director of Hydrolea LLC (operating Akhmeta, Debeda and Kasleti 2 HPPs);
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);
 - Luka Chachibaia – Technical Director, GGU Group;
 - Nino Sulkhanishvili – Environmental & Social Officer GGU Group;
 - Sophie Natroshvili – Head of Public Relations Department of GWP;
 - Zurab Alpaidze - Chief Technical Officer Georgian Water and Power;
 - Tina Simonishvili – Head of International Relations and Funding, GGU Group;
 - Ana Akubardia - International Relations and Funding, GGU Group;
 - Andro Gogoladze – Head of O&M;
- Health and Safety Session held on 17 June 2020, with:
 - Luka Chachibaia – Technical Director, GGU Group;
 - Nino Sulkhanishvili – Environmental & Social Officer GGU Group;
 - Zurab Alpaidze - Chief Technical Officer Georgian Water and Power;
 - Gaga Tkemaladze – Health & Safety Manager GGU Group;
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);
 - Tina Simonishvili – Head of International Relations and Funding, GGU Group;
 - Ana Akubardia - International Relations and Funding, GGU Group;
- Labour Session held on 17 June 2020, with:
 - Levan Asatiani - project development engineer;
 - Luka Chachibaia – Technical Director, GGU Group;
 - Lika Megrelishvili – Head of Evaluation, Training and Development Division, GGU Group;
 - Tina Simonishvili – Head of International Relations and Funding, GGU Group;
 - Irakli Kvadagadze – Head of Procurement Department, GGU Group;
 - Nino Mikeladze – Head of Administration, GGU Group;

- Gaga Tkemaladze – Health & Safety Manager GGU Group;
- Nino Sulkhanishvili – Environmental & Social Officer GGU Group.
- Supplementary Management Interviews focusing on GWP activities held on 1 July 2020, as follows:
 - Environment, Health and Safety, held with:
 - Giorgi Vakhtangishvili – Chief Executive Officer, GGU Group;
 - Zurab Alpaidze - Chief Technical Officer Georgian Water and Power;
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);
 - Sophie Natroshvili – Head of Public Relations Department of GWP;
 - Gaga Tkemaladze – Health & Safety Manager GGU Group;
 - Irakli Babukhadia - Head of Water Business, GGU Group;
 - Irakli Kvadagadze – Head of Procurement Department, GGU Group;
 - Luka Chachibaia - Technical Director, GGU Group;
 - Jaba Mamulashvili - Chief Legal Officer;
 - Nino Sulkhanishvili – Environmental & Social Officer GGU Group;
 - Social session (Involuntary Resettlement and Stakeholder Engagement), held with:
 - Ana Akubardia - International Relations and Funding, GGU Group;
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);
 - Luka Chachibaia - Technical Director, GGU Group;
 - Irakli Babukhadia - Head of Water Business, GGU Group;
 - Irakli Kvadagadze – Head of Procurement Department, GGU Group;
 - Gaga Tkemaladze – Health & Safety Manager GGU Group;
 - Jaba Mamulashvili - Chief Legal Officer;
 - Zurab Alpaidze - Chief Technical Officer Georgian Water and Power;
 - Nino Sulkhanishvili – Environmental & Social Officer GGU Group
 - Sophie Natroshvili – Head of Public Relations Department of GWP;
 - Tina Simonishvili – Head of International Relations and Funding, GGU Group;
 - Labour and Working Conditions, held with:
 - Lika Megrelishvili - Head of Evaluation, Training and Development Division, GGU Group;
 - Luka Chachibaia - Technical Director, GGU Group;
 - Gaga Tkemaladze – Health & Safety Manager GGU Group;
 - Nino Sulkhanishvili – Environmental & Social Officer GGU Group;
 - Zurab Alpaidze - Chief Technical Officer Georgian Water and Power;
 - Levan Asatiani - Project Development Engineer GRPC (Hydropower);
 - Irakli Kvadagadze – Head of Procurement Department, GGU Group;
 - Irakli Babukhadia - Head of Water Business, GGU Group.

4.3 Reporting

An initial master list of findings, developed based on the desktop review of documents provided was submitted to the Company on 10th June 2020.

An E&S Gap Analyses Report covering GGU ESMS Assessment, Project-level assessments for 6 Hydropower projects and one Wind Farm Project and high-level GWP assessment was prepared by ERM and shared with the Company on 22 June 2020. Upon receiving feedback from the Company and ADB, the respective report was amended to focus on GGU Corporate ESMS and GWP, as the Subproject of ADB financing (use of proceeds).

This Gap Analyses Report represents the key deliverable of ERM's amended E&S Assessment and it is accompanied by the CAP, submitted as a standalone document. The CAP includes actions identified to be necessary to meet the Applicable Standards. These are accompanied by timelines for implementation (with the emphasis on achieving compliance as soon as possible) and an indicator of the completion parameters.

5. E&S GAP ANALYSES FINDINGS

5.1 Commentary on eligibility of the Project for ADB Funding

The activities conducted by GWP, under the intended use of proceeds, include:

- network and infrastructure development;
- trunk and distribution line maintenance, mostly on roads;
- infrastructure capital repairs;
- procurement and installation of valves and meters (metering program);
- connection to new customers.

According to the ADB Prohibited Investment Activities List⁶, these activities are not excluded from investment by ADB.

5.2 ADB Project Categorization

In line with ADB standards, Projects are classified as category A, B, C, FI, according to the following Safeguard categories⁷:

- Environment;
- Involuntary Resettlement;
- Indigenous Peoples.

The FI category has not been considered relevant for the assessed assets because investment from ADB would not go through a financial institution (FI).

Table 5-1 below presents the relevant ADB categories for these assets.

Table 5-1 ADB Project Categories relevant for the assessed renewable assets

Category	A	B	C
Environment	A proposed project is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental impact assessment (EIA), including an environmental management plan (EMP), is required.	The proposed project's potential adverse environmental impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. An initial environmental examination (IEE), including an EMP, is required.	A proposed project is likely to have minimal or no adverse environmental impacts. An EIA or IEE is not required, although environmental implications need to be reviewed.
Involuntary Resettlement	A proposed project is likely to have significant involuntary resettlement impacts. A resettlement plan, which includes assessment of social impacts, is required.	A proposed project includes involuntary resettlement impacts that are not deemed significant. A resettlement plan, which includes assessment of social impacts, is required.	A proposed project has no involuntary resettlement impacts. No further action is required.
Indigenous Peoples	A proposed project is likely to have significant impacts on	A proposed project is likely to have limited impacts on	A proposed project is not expected to have

⁶ Appendix 5 of the ADB Safeguard Policy Statement (June 2009)

⁷ <https://www.adb.org/site/safeguards/safeguard-categories>

	indigenous peoples. An indigenous peoples plan (IPP), including assessment of social impacts, is required.	indigenous peoples. An IPP, including assessment of social impacts, is required.	impacts on indigenous peoples. No further action is required.
--	--	--	---

Source: ADB Safeguard Categories, <https://www.adb.org/site/safeguards/safeguard-categories>

Following the E&S Assessment, ERM has assigned the following categories (see **Error! Reference source not found.** below) to the assessed assets:

Table 5-2 ADB Project Categorisation

Category	Environment	Involuntary resettlement	Indigenous peoples
GWP activities under use of proceeds	B	C	C

ADB funded activities are categorised as B for environment as the associated potential adverse environmental impacts are site-specific and addressed through mitigation measures defined on the basis of a risk and impacts identification process, in line with the ESMS in place.

For involuntary resettlement, the assessment has categorised ADB funded activities as C because the network rehabilitation and new connection works are not expected to result in displacement impacts.

ADB SPS SR3 is categorized as C because the GWP activities to be financed by ADB, are located within Tbilisi and neighbouring areas, in an urban environment, and Tbilisi does not have any vulnerable communities of Indigenous Peoples or ethnic minorities.

5.3 Reputational risk assessment

An external factors review was performed based on an internet search targeted on any potential reputational aspects related to GGU and its subsidiary businesses.

The relevant outcome/returns of this review are provided in Appendix B to this report and a brief summary included below:

- The External Factors Review identified an article published in January 2020⁸ with regard to a lawsuit being filed by two families against Tbilisi City Hall and GWP following the deaths of young family members in an area of the Tbilisi reservoir called *Tbilisi Sea*. After two years, the Court ruled on the need for the City Hall and GWP company to install warning banners nearby the so-called waterfall on the Tbilisi Reservoir as well as to construct a 2.5 m high concrete wall alongside the channel to prevent people from climbing over it. As per the information on the matter provided by the Company representatives, the lawsuit is ongoing at the Appeal Court and includes a claim in amount of 30,000 USD (to be split between the City Hall and GWP in case of success). The first court passed a resolution in favour of Municipality and GWP and refused to satisfy the requests of the claimants, given absence of applicable regulations. Any related liabilities for the company are considered unlikely given that the area where the young people drowned is not under GWP administration.
- The External Factors Review resulted in multiple returns pertaining to opposition (by local Svan community in particular and by wider public in general) against hydropower developments in

⁸ Source: <http://www.humanrights.ge/index.php?a=main&pid=20049&lang=eng>

Svaneti region, the Mestiachala HPPs being mentioned in this context. However, the opposition does not seem targeted against Mestiachala HPPs in particular, but rather towards the development of larger scale HPPs and future hydropower developments in the particular region.

The above External Factors Review was completed by:

- a review of any potential reputational aspects triggered in relation to the environmental fines issued by authorities, and
- review of DG Consulting assessment report in relation to GGU renewables energy sites for any potential reputational issues identified.

This review did not identify any aspects with potential significant reputational risk for GGU.

5.4 Presentation of E&S Findings

5.4.1 Environmental and Social Assessment and Management

5.4.1.1 Environmental and Social Management

The management of E&S aspects associated with the company operations is based on a management system aligned with the good international practice. Certification to recognised international management systems has been currently attained only for GWP (for ISO 9001 – Quality and ISO 14001 – Environmental).

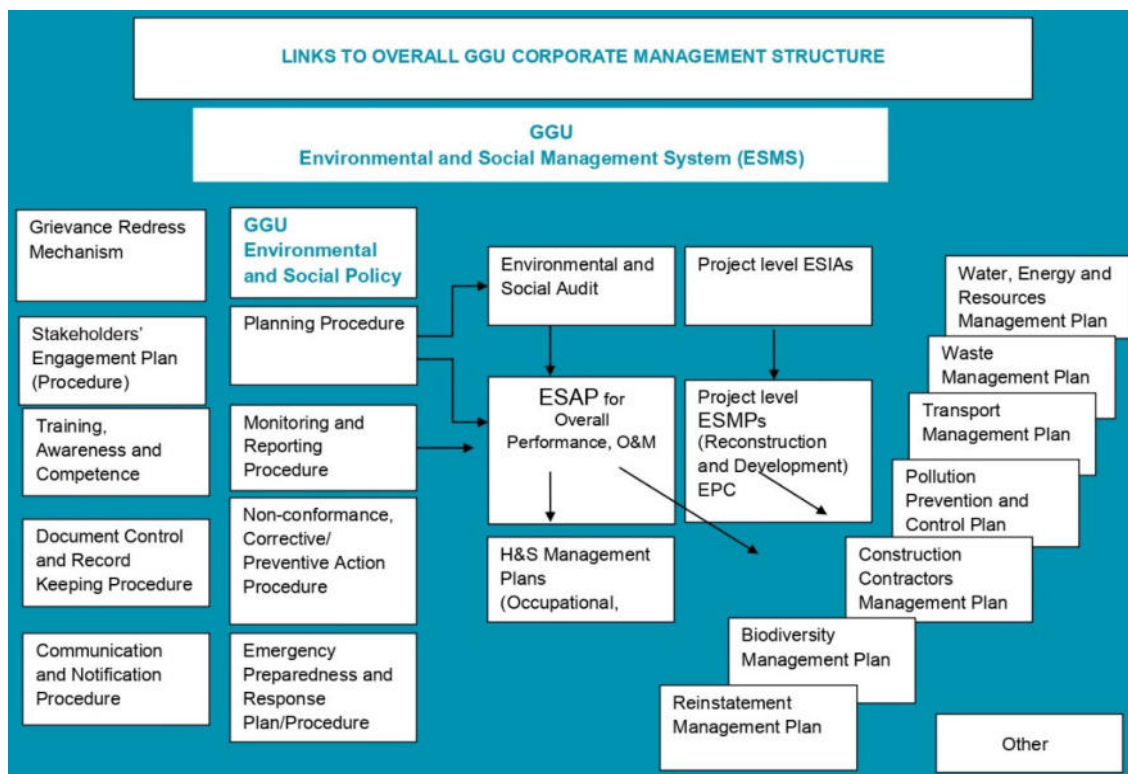
At the corporate level, GGU has adopted Policies addressing, environmental, social, health and safety and labour aspects and implemented a number of E&S procedures addressing the including the following:

- ESMS Monitoring and Reporting Procedure;
- ESMS Planning Procedure;
- Non-conformance Preventive and/or Corrective Action Procedure;
- Emergency Preparedness And Response Procedure;
- ESMS Training, Awareness and Competence Procedure;
- ESMS Document Control and Record Keeping Procedure;
- Communication and Notification Procedure;
- Stakeholder Engagement Procedure, including a high level description of Grievance Mechanism process.

The above GGU procedures are supported by a number of topic-specific management plans (e.g. Occupational H&S Management Plan, Community H&S Management Plan, Water, Energy and Resources Management Plan, Waste Management Plan, Transport Management Plan, Construction Contractors Management Plan, Biodiversity Management Plan and Reinstatement Management Plan).

An overview of the ESMS structure including the relationship between the above-indicated management system documents is provided in Figure 5-1 below.

Figure 5-1 GGU ESMS structure



Source: GGU

The GGU ESMS management plans are generic documents defining the high-level requirements applicable for the management of each of the E&S aspects addressed. These documents require the development and implementation of site-specific management plans by the Construction Contractors and indicate requirements for the development and implementation of topic-specific management plans by GWP in relation to water and wastewater network operations. A brief summary of the ESMS management plans content including where the case indication of availability of GWP topic-specific management plans for the water and wastewater network operations is provided below:

- Contractor Management Plan:
 - defines key GGU staff responsibilities in relation to contractors' management;
 - defines requirements for the management plans to be developed by the construction contractors on project by project basis;
 - defines the subcontractor management requirements to be put in place by the construction contractors on project by project basis;
 - defines the monitoring and review process in place to ensure the plan requirements implementation;
 - defines Non-conformance, Corrective and Preventive Action Procedure;
 - at contracting stage, contractors are provided with the GGU ESMP package and required to implement ESMP requirements. Contractor acknowledgment sample for receiving ESMP package provided for review.
- Community Health and Safety Management Plan (refer to section 5.4.4.2 for further details):

- the document states the key community health and safety commitments applicable throughout all GGU activities including existing operations and construction activities;
- includes requirements for employed construction contractors to develop and implement own Community Health and Safety Management Plan on project by project basis;
- includes requirements for the development of Operational Community Health and Safety Management Plan. **The GWP Operations Community Health and Safety Management Plan was not available/not provided for review in the frame of this assignment.**
- Occupational Health and Safety Management Plan (refer to section 5.4.4.1 for further details):
 - defines applicable standards, key roles and responsibilities, safety requirements, required safety procedures, emergency response requirements and the review and audit process;
 - the occupational health and safety procedures in place at GWP level were provided for review;
- Pollution Prevention and Control Plan (refer to section 5.4.3.3 for further details):
 - addresses general requirements related to management of wastewater and storm water, spill prevention and control, hazardous materials storage and handling, air emissions and dust control, and noise management at project/construction sites;
 - defines key staff responsibilities for the monitoring and reporting of above-indicated requirements, in relation to construction (including water distribution and sewer system intervention activities);
- Reinstatement Management Plan:
 - defines general requirements applicable to GGU Construction Department and Construction Contractors in relation to reinstatement of construction sites;
 - addresses general aspects related to excavations, excavated materials storage, site reinstatement and decommissioning;
 - requires development by the contractor of site/works-specific Excavation Management and Reinstatement Plan (EMRP) detailing implementation of above-indicated requirements;
- Transport Management Plan:
 - identifies key traffic related risks and associated mitigation measures;
 - defines general requirements for Construction Contractors and GGU Transport Operator (Department) in relation to construction traffic management;
 - requires development by the Construction Contractors of site/works-specific Access Roads & Transport Management Plans for the “large-scale construction sites” of the GGU Projects to be prepared (both civil and installation) detailing implementation of the management plan requirements. **The plan does not define the criteria for construction site being considered of “large scale” thus triggering the requirement for the site-specific Access Roads & Transport Management Plan development and implementation.**
- Water, Energy and Resources Management Plan:
 - indicates the requirement for a Water Management Plan aimed at attaining six strategic goals related to water use efficiency. **The GWP Water Management Plan is to be further developed and was not available for review.**
 - defines a 4-stages energy efficiency plan including:
 - establishment of an Energy Management Team – completed/part of GGU organisation;

- performance of facility-level assessment to identify energy efficiency opportunities, and prioritise measures to address these. The status of implementation of this stage at GWP level is to be further confirmed;
- development of an Energy Management Plan. **The GWP Energy Management Plan is to be further developed and was not available for review;**
- implementation of the Energy Management Plan.
- Indicates the company resource efficiency commitments including:
 - implementation of Waste Management Plans. The GWP Waste Management Plan⁹ is in place;
 - defines key commitments and targets for recovery and reuse of construction and demolition materials. **The plan does not detail the processes/measures in place to attain set targets and the key performance indicators considered for tracking the implementation.**

While the ESMS in place provides an adequate overall framework for the management of the E&S aspects, the review performed identified a number of corrective actions required as follows:

- *Develop and implement GWP Operations Community Health and Safety Management Plan, in line with the Corporate Community Health and Safety Management Plan requirements*
- *Amend the Transport Management Plan to include requirement for site-specific Access Roads & Transport Management Plan development and implementation at each construction site. The site-specific management plans are to be fit for purpose and address specific traffic issues as needed.*
- *Develop and implement GWP Water Management Plan, in line with the Corporate Water, Energy and Resources Management Plan Management Plan requirements*
- *Develop and implement GWP Energy Management Plan, in line with the Corporate Water, Energy and Resources Management Plan Management Plan requirements*
- *Amend the Water, Energy and Resources Management Plan to detail the processes/measures in place to attain set construction and demolition materials recovery targets and the key performance indicators considered for tracking the implementation.*
- *Adoption of E&S risk assessment and / or screening procedures to identify potential risks and impacts associated with planned project activities.*

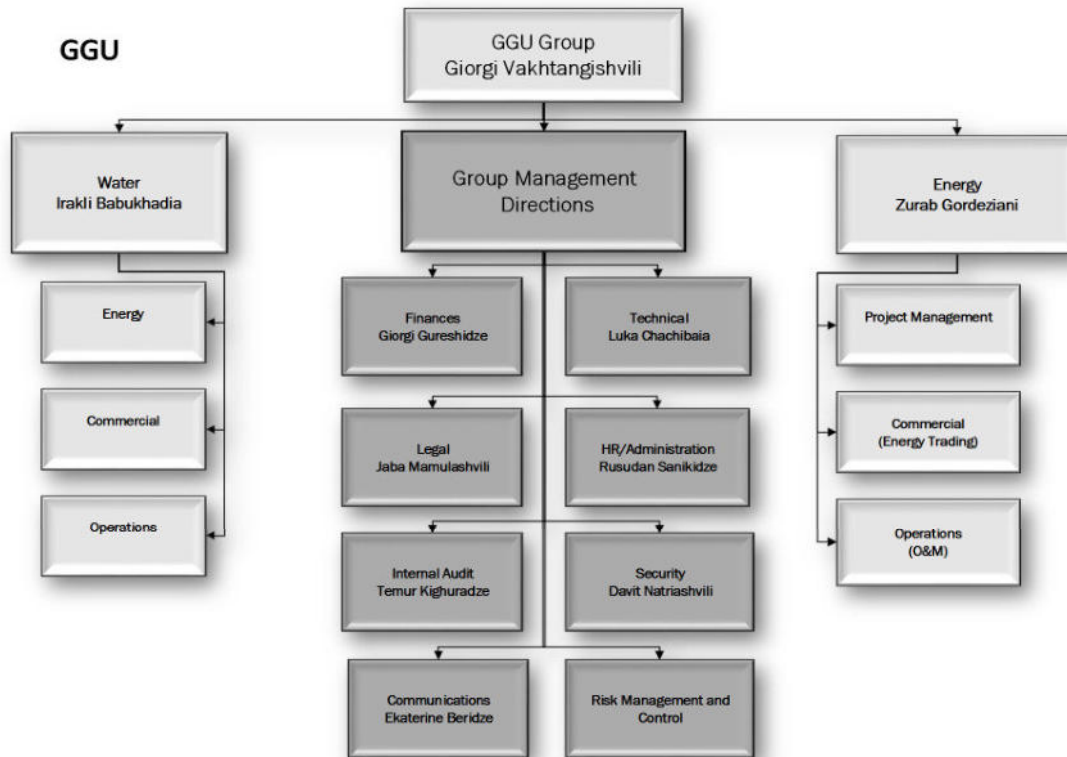
Evidence of ESMS implementation is to be provided as part of periodic Company reporting to lenders and confirmed in the frame of lenders E&S monitoring.

5.4.1.2 Organisational Capacity and Competency

The overall GGU management organisation structure is presented in Figure 5-2 below.

Figure 5-2 GGU Management Organisation

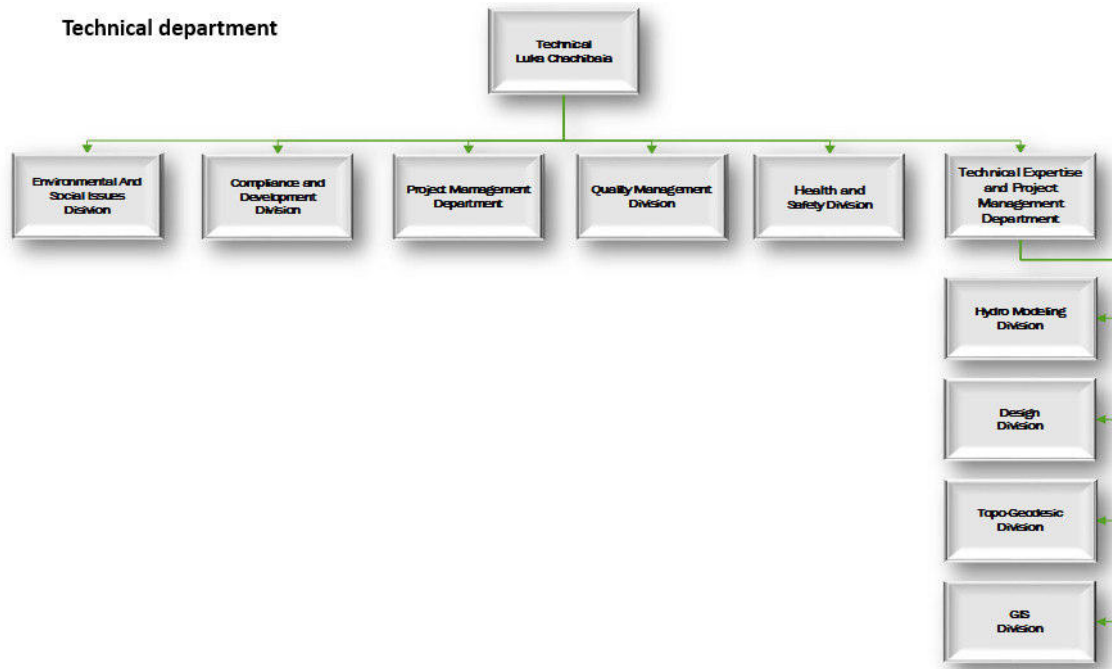
⁹ Document in Georgian language. High level review indicates adequate structure and content of the document.



Source: GGU

The key company organisation subunits in charge of the ESMS implementation are represented by the Environmental and Social Division and the Health and Safety Division, both part of the Technical Department – refer to the organisation chart in figure 5-3 below. In implementing the ESMS, these two division cooperate with the HR/Administration Department, the Security Department and with other Company departments as needed.

Figure 5-3 GGU Technical Department Organisation



Source: GGU

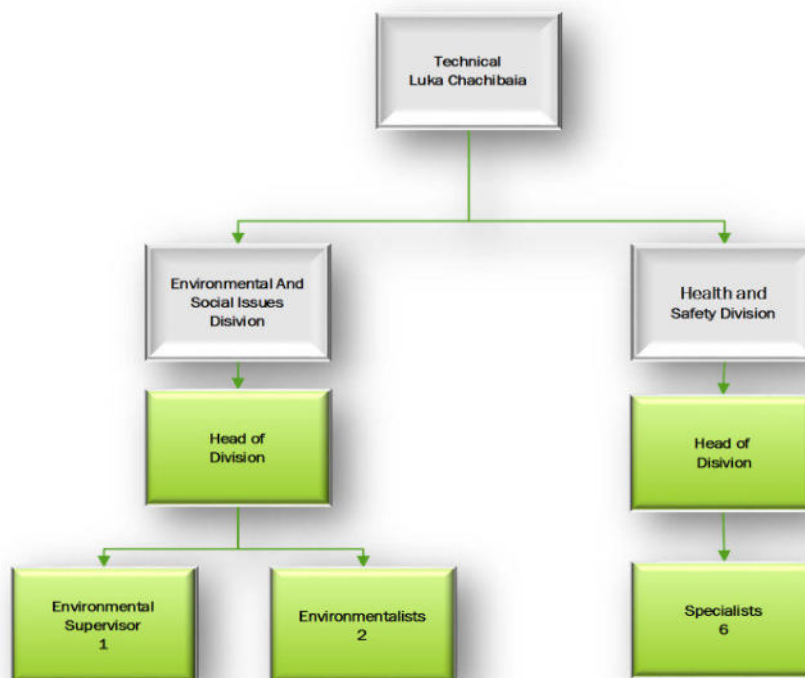
At corporate level, the Technical Department key staff with E&S management roles includes:

- Environmental and Social Division Manager reporting to the Chief Technical Officer;
- Health and Safety Division Manager reporting to the Chief Technical Officer;
- One Environmental Supervisor reporting to the Environmental and Social Division Manager;
- Two Environmental Officers ("Environmentalists") reporting to the Environmental and Social Division Manager;
- Six Health and Safety Specialists reporting to the Health and Safety Division Manager.

The overall responsibility for the management of the E&S aspects lies with the Chief Technical Officer (the Technical Department Manager).

The above-indicated key E&S Headquarter management roles are represented in the organization chart in Figure 5-4 below:

Figure 5-4 E&S Management Staffing



Source: GGU

The above-indicated staff are based at the company headquarters level and are in charge of the overall management of E&S aspects from corporate to site level. Their roles include E&S management planning, coordination of E&S site-based staff and schedule-based E&S site inspection (typically two visits of each site on monthly basis).

At each site, responsibilities for E&S management and reporting is allocated to technical department site-based staff and to the contractors (whose activities are regularly checked by the GWP' Project Managers and Supervisors). With some exceptions, in general these employees exercise both E&S management and technical/operational duties. They are trained for the performance of their E&S site supervision duties and ensure the regular reporting to the corporate E&S management. For the construction sites, this site-based E&S staff ensures the supervision of contractors.

The above-indicated staffing appears adequately scaled and fit for the purposes of the management of the E&S aspects associated with the Company operations.

5.4.1.3 E&S Training

An ESMS Training, Awareness and Competence Procedure is developed, indicating the type of E&S training modules required for each team including indication of training required by role level in the company.

The procedure includes requirement for ESMS Awareness Training (for leadership positions) and for Competency ESMS Training (for staff with E&S and H&S responsibilities).

The Company has established a Training Centre managed by the HR Department which ensures the logistics support for the training delivery.

According to the information provided, in 2019 over 830 employees were engaged in various technical and operational trainings, 600 newcomers trained and up to 500 retrained in health and safety.

As informed by GGU management representatives, the training needs and training delivery tracking is ensured on the basis of the records of training participants and with the HR Department support.

The ESMS Training, Awareness and Competence Procedure requires the implementation of an ESHS Training Plan including provision of a Training Matrix for tracking training needs and training delivery by positions and staff members. However, a Training Matrix system is yet to be implemented.

It is recommended that the ESMS Training, Awareness and Competence Procedure is improved to outline how the specific job and skill related certification and competency is being assessed and managed and clarify how are the critical E&S, safety positions deemed competent for their roles. It is further recommended that a Training Plan including a Training Needs Analysis and a Job Competency Matrix or similar is developed and implemented in line with the ESMS Training, Awareness and Competence Procedure requirements, to ensure that all personal (including Contractors staff) are adequately trained, licensed/certificated and competent for their positions.

5.4.1.4 Monitoring and Reporting

GGU has an Environmental and Social Policy Framework which includes the Monitoring Program for all their operations.

The Monitoring Program describes the parameters to be monitored, the activities to be executed, locations, time and frequency of monitoring activities, and the collection, analysis, and reporting of monitoring data. Monitoring includes:

- baseline monitoring,
- compliance monitoring,
- impacts and mitigation monitoring.

The E&S monitoring is performed ongoing by the site-based personnel with E&S responsibilities and through scheduled site inspections by the corporate E&S management staff.

The E&S reporting includes the following type of reports:

- Incident and Near-Miss Reports. All staff (including contractors) have responsibility for reporting any HSE incidents and near misses. The incidents and near miss reports are reported to the corporate E&S Management within 24 hours of the occurrence.
- Inspections Reports. For the sites at construction stage, site inspections are performed by the site-based E&S staff and the inspection reports issued on daily basis. For the operational sites inspections are performed by the corporate E&S management staff (typically twice monthly at each site) and reports issued accordingly.
- Monthly E&S Reports. These represent complete E&S Performance Reports addressing all Company facilities and operations.
- External Annual (or Quarterly) Monitoring Reports. These represent external monitoring reports (e.g. to international lenders).

The program aims to monitor conditions at the sources of the potential disturbances or at the locations of impact receptors. Impact monitoring is particularly relevant with regard to social impacts, as the cause of impacts is often not any single impact, but rather an accumulation of diffuse impacts.

GGU ensures that the contract/bidding documents (including specifications and bills of quantities) for the repair, reconstruction or construction works contain a listing of all required mitigation measures and a time frame for the compliance monitoring of these activities.

The noise level monitoring is usually carried out at HPP and Wind power houses of GGU assets.

Besides, noise monitoring is periodically carried out on pumping stations of water supply network.

According to the technical regulation of drinking water, raw groundwater monitoring is quarterly carried out at underground water intake places for drinking water system. The reports are submitted to the Ministry of Environment quarterly. Besides, groundwater monitoring is also carried out at GGU HPPs.

The Group reports to the State bodies on regular basis on water extortion and discharge parameters; on use of groundwater; on drinking water quality, waste management, etc. This information is public.

Non-conformance reporting and tracking is performed in line with the GGU (corporate-level) Non-conformance Preventive and Corrective Action Procedure applicable throughout the group entities. The procedure defines the process for identification, documentation corrective actions implementation and tracking to closure.

Preventive or corrective actions may be initiated using this procedure for any ESMS related ESHS problem affecting the Company's performance. Identified non-conformances are reported in pre-defined format (specific form including required non-conformance and response action details on case-by-case basis provided) and requires that records are maintained in a database for minimum 2 years from closure. The procedure however does not include the requirement for a non-conformance tracking register/log file to ensure consistency in terms of data recorded across the Company and ensure tracking of up-to-date status and of each non-conformance entry and documentation of closure.

The Non-conformance Preventive and Corrective Action Procedure is to be amended to include requirement for maintaining a non-conformance tracking register (non-conformance log) on project/construction site and operations basis. As a minimum the register is to document as a minimum the issue (non-conformance) identified, date of occurrence, issue categorization (e.g. as safety/environmental/social issue), response action and implementation responsibilities, status (e.g. as open or closed), date of closure and reference document (e.g. Corrective Action Request Form number and/or reference to other files documenting actions implemented).

Environmental Fines

The following environmental fines were issued to GWP by Ministry of Environment (MoE) in 2019 due to the following non-compliances listed below:

- spill out of wastewater from a damaged sewage collector;
- accidents on the network due to old infrastructure ending up with environmental pollution by the leaking sewage;
- intentional damage of the collector in rural areas by the communities who want to use the water for irrigation purposes on their agricultural lands;
- illegal industrial wastewater discharge by third parties into GWP sewage network.

GGU stated that the corrective actions were taken after receiving the non-compliance letters from the MoE and added that GWP notified the MoE via following official letters in April 2020 accordingly:

- The letter dated 15.04.2020 referred to certain damages of the water sewage observed by the Department of Environmental Monitoring at the given address in Tbilisi. As a result of the technical measures taken by the relevant service of the company/GWP, the damaged section of the sewerage network has been restored.

- The letter dated 02.04.2020 referred to the complaint of people living at the certain address about damages of water sewage system and surveillance wells. The letter of GWP confirms that all damages have been fixed and the water system works well.

5.4.1.5 Stakeholder engagement and consultation

Governance structure

Corporate level

With the Group (GGU) structure, responsibility for external stakeholder engagement, information disclosure and grievance management for the Group operations lies with the E&S Division that sits under the GGU Group Management Technical Direction (see *Figure 5-3* above).

The E&S Division comprises two Environmental Officers (Environmentalists as referred to in *Figure 5-4* above), one Environmental Supervisor and one head of division (Environmental and Social Division Manager). The E&S Division collaborates for the stakeholder engagement process with the Communications Direction of GGU (PR Department) (see details under *Section 5.4.1.2*).

Locally, at facility-level (HPPs and WF), some staff are allocated CLO duties (in full or shared with other responsibilities). The CLO staff reports to the Corporate E&S Division of GGU. Additionally, GGU representatives reported that the facility-level management and the Operation & Maintenance (O&M) team is also involved in the process.

The worker grievance mechanism is set up separately and it is also coordinated at Group (GGU) level. The worker grievance mechanism is set up separately and it is presented under *Section 5.4.2*.

In terms of capacity building, the *Training, Awareness and Competence Procedure* developed under the GGU ESMS identifies several training modules that are relevant in the context of the ESMS development. Stakeholder Engagement has been defined as *Module 5* in the relevant training modules to be delivered to the team in charge of the ESMS. The Procedure further indicates that the “GGU Senior E&S Specialist will provide overall guidance and direction for conducting of ESHS management awareness and competency training. The GGU Senior H&S Specialist, ESHS Inspectors and Contractors’ HSE Managers will ensure personnel within their activities to receive ESHS awareness and competency training on a monthly/quarterly basis. They will identify all personnel within their activity that by profile/type of their assignments, primary job functions, and/or additional duties require ESHS awareness and competency training, skills or certification.” GGU representatives reported that topics related to stakeholder engagement are included in the agenda of general social planning which are conducted annually for the relevant staff in PR, E&S, HS, local staff at the assets. The most recent training was delivered in October 2019 and covered the following topics:

- Regulations and requirements;
- Existing procedure and brief summary of previous consultations;
- Identify stakeholders of the project;
- Public Consultation and Information Publication Program;
- Temporary Stakeholder Involvement Program;
- Resources and Responsibilities.

This training session was attended by 18 participants at Corporate level. Based on the list of participants, the staff with CLO responsibilities at facility-level did not attend the training. To address this gap, it is necessary to deliver training on stakeholder engagement and the grievance management process to all staff with relevant duties (at both Corporate and facility-level).

As a general practice, contractors engaged in the works are provided with the EHS and social requirements they have to meet as part of the GGU ESMS while conducting the respective works. These requirements are conveyed to the management of the contractor companies during the procurement process and during the induction meeting. It is then the responsibility of the contractors to train their own staff with regard to these requirements. GGU does not train contractor personnel with regard to the ESMS requirements.

EHS and social requirements for Contractors are laid down in the Contractor Management Plan developed in May 2017 as part of the GGU Environmental and Social Management Plans (ESMP) Package. However, this Plan does not include any requirements for contractors with regard to actions needed in case someone provides a verbal or written grievance while they are performing the works of behalf of GGU. It is necessary to amend the Contractor Management Plan to formally require contractors to appoint a person in charge for stakeholder engagement and grievance management. Also, contractor staff with these responsibilities need to be trained with regard to stakeholder engagement and the grievance management processes defined as part of GGU ESMS.

Subproject audit component

Within the Group's largest asset (GWP), stakeholder (including customer) engagement, information disclosure and grievance management responsibilities lie with the PR Department working under the Communication and Customer Care Departments of GWP. These Departments are subordinated to the GGU Group Management Communications Direction (see *Figure 5-2* above), working closely with the E&S Division under GGU. The GWP PR Department has four employees including the head of department. The Customer Care Department has 20 operators working in shifts to cover 24 hours and also coordinates four customer service centres located in districts of Tbilisi which employ approximately 50 people. GWP also has assigned 12 Project Managers and 12 Supervisors to monitor rehabilitation works, as 12 such rehabilitation projects can be run in parallel by contractors. Project Managers and Supervisors inspect the sites where contractors conduct such works and are reported to be able to pick up any grievances that may be addressed to contractor staff and put them through the system. New connection works are considered of a much smaller scale and do not engage a Project Manager and Supervisor from GWP to monitor contractors.

Stakeholder Analysis and Engagement Planning

Corporate Level

The Stakeholder Engagement Procedure defined under the GGU ESMS refers to the GGU Stakeholder Engagement Plan (SEP) developed as a separate document, as part of the Company's management programs. The SEP was developed in 2017 and has the following structure:

- GGU Activities;
- Regulations and Requirements;
- Existing Procedure and Summary of Previous Consultations;
- Identification of Project Stakeholders;
- Public Consultation and Disclosure Program;
- Provisional Stakeholder Engagement Program;
- Resources and Responsibilities;
- Grievance Redress Mechanism;
- Monitoring, Reporting and Record Keeping;
- Management Functions.

Main relevant stakeholder groups identified in the GGU SEP include:

- Consumers (residential and non-residential subscribers within the scope of Tbilisi, Rustavi and Mtskheta, to which the company renders 24-hour uninterrupted water supply and sanitation services, as well as potable water);
- Affected Communities, including households and community members close to the Company operations sites/facilities (including communities or households affected by closely located reservoirs, pump stations, workshops, water/sewage mains, other assets);
- NGOs and civil society members who are concerned about environmental or other impacts, especially in the natural areas, natural management areas, and national parks;
- Personnel/workers commissioned by GGU to operations or maintenance/repair, or reconstruction/development works;
- Georgian National Energy and Water Supply Regulatory Commission;
- National government bodies;
- Regional/local authorities - Tbilisi, Rustavi, and Mtskheta Municipalities;
- National and regional media outlets;
- Personnel/workers commissioned by GGU to operations or maintenance/repair, or reconstruction/development works.

The review of the 2017 SEP has led to the following conclusions:

- The GGU activities described in the SEP mainly refer to the GWP water utility business (production of water, supply to the population and collection and treatment of wastewater). However, the SEP does not include a description of the renewable energy assets (HPPs and WF) that GGU currently owns and operates. *Given the recent expansion of the portfolio of assets, the Corporate SEP (eg Chapter 1 describing GGU activities) needs to be updated accordingly.*
- The SEP Chapter 2 - *Regulations and Requirements* still refers to the old Georgian legislation on environmental impact assessment which has in the meantime been amended; the new EIA legislation introduces requirements to have public hearings at the scoping stage and at the EIA Report assessment stage.
- The SEP Chapter 3 – *Identification of Stakeholders* refers to the main categories of stakeholders relevant for GWP and does not refer to stakeholders relevant for the recently acquired assets.
- The *Provisional Stakeholder Engagement Program* presented in Chapter 5 is very generic and does not identify affected communities (local residents) as a particular group of stakeholders requiring specific engagement and reporting with regard to the company / facility E&S during the operational phase.
- Chapter 6 on *Roles and Responsibilities* refers to the GGU Communications Director and the CLOs as having the responsibility of continuing communications with the customers, local and governmental authorities, affected communities and other stakeholders. However, during the virtual interviews, GGU representatives reported that the responsibility for stakeholder engagement at Corporate level lies with the E&S Division while for GWP it lies with the Communication and PR functions. *It is recommended that roles and responsibilities assigned within and between different directions and divisions/departments within the company are clearly presented in the SEP.*
- Similarly, Chapter 7 on the *Grievance Redress Mechanism* is quite generic and allows for improvement in terms of clearly defining which department and staff is in charge to receive grievances, log and follow them through resolution. The SEP indicates that when receiving a grievance, GGU would assign someone to be responsible for resolving the grievance. It is

necessary to develop a very clear External Grievance Management procedure under the GGU ESMS (that can also be included in the SEP) to:

- specify all the relevant channels available for filing grievances;
- clearly assign responsibilities to divisions/ departments and functions within the Company for managing grievances at each step;
- define timelines for each step in the grievance management process from receipt through resolution and seeking feedback from the grievance and closure;
- required documentation/records to be kept and responsibilities for record keeping;
- process and responsibilities for escalation in case of unresolved or complex grievances;
- be adopted and implemented at every asset-level, with clear indication of how roles may change depending on local organisation around grievance management.

A separate procedure is in place for workforce grievance management and it is therefore recommended that the scope of the grievance procedure (to be defined under GGU ESMS and included in the SEP) does not include internal grievances.

- Chapter 9 *Management Functions* of the SEP appears to be duplicating information presented in Chapter 6 and includes information which is understood to be valid at GWP level however not at GGU Corporate level.

The overall conclusion is that the Corporate SEP needs to be amended and updated to reflect the current GGU structure and allocation of roles and responsibilities at Corporate and facility-level. Additionally, the grievance redress mechanism presented in the current SEP needs to be further developed into an external grievance management procedure under the ESMS and needs to define clear roles and responsibilities, by departments and functions, and timelines for each step of the management process.

Subproject audit component

GWP has a procedure regulating timelines and methods for prior notice to consumers in case of planned interruptions. As GWP is a monopoly company, such timelines are regulated by the Georgian National Energy and Water Supply Regulatory Commission (GNERC). GWP representatives were well aware of how and how much time in advance they need to communicate to stakeholders, particularly in case of planned works requiring an interruption of water supply. GWP representatives informed that there are multiple channels of communication and information available for the consumers in Tbilisi, such as hotline, company website (<https://www.gwp.ge/en/>), Facebook page, SMS.

GWP operations are covered by the 2017 Corporate (GGU) SEP. However, as the 2017 is considered to be outdated in many aspects (see above under Corporate SEP), a dedicated SEP (building on an updated Corporate-level one) is necessary to be developed and implemented for GWP. As part of the Engagement Action Plan to be defined in the SEP, GWP should plan engagement with the relevant stakeholders (communities, industrial operators) with the intent to:

- raise awareness of the grievance redress mechanism and channels available to lodge grievances;
- disclose and consult on network expansion projects;
- address intentional damage of the collector in rural areas by the communities who want to use the water for irrigation purposes on their agricultural lands;
- address illegal industrial wastewater discharge by third parties into GWP sewage network.

Information Disclosure & Consultation and Participation

Corporate Level

The Stakeholder Engagement Procedure defined under the GGU ESMS includes the GGU's commitment for community engagement to be *"free of external manipulation, interference, coercion and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate manner."* Furthermore, the Procedure states that *"consultation activities should always be well planned and based on principles of respectful and meaningful dialogue."*

GGU assets requiring an EIA and going through the national EIA permitting process have been through a public hearing hosted by the Ministry of the Environment.

Subproject Audit Component

The planned rehabilitation works are communicated to the Tbilisi Municipality which in its turn also communicates them and requires similar planning from the other utility companies. The municipal areas with water network assets to be rehabilitated are agreed by the Municipality and then people are informed of which works would be conducted during the course of the year.

There are several channels of communication used by GWP to inform about the planned and ongoing works, duration of projects, location and water supply restrictions, if applicable. These include SMS being sent to customers, TV channels and news agencies and company website.

New connection works are considered small in scale and are not disclosed publically.

External Communications

The E&S Policy Framework mentions a Communication and Notification Procedure "to ensure that there is clear communication on environmental and social issues within GGU management, as well as with contractors, community and stakeholders; and a system for receiving, documenting and responding to relevant communication or grievances from external interested/affected parties, based on Stakeholders Engagement Plan." ERM has had no visibility over such Procedure as part of the ESMS.

It is recommended to develop an External Communication Procedure at GGU Corporate level, as part of the ESMS, to ensure that external communications relating to the E&S performance of the company are dealt with professionally and effectively. This procedure should define and help maintain a publicly available and easily accessible channel for members of the public to be able to contact GGU and the relevant entities within (e.g. through a phone number, website, or email address). This procedure is different from the grievance mechanism which is usually targeting adversely impacting stakeholders so that the company can address complaints that may arise.

This Corporate External Communication Procedure is then to be transposed at every subproject-level.

External Grievance Redress Mechanism

Corporate

As indicated above under *Stakeholder Analysis and Engagement Planning*, a grievance mechanism to handle external complaints is defined within the Corporate SEP and the Subproject-level SEPs that are in place. However, considering the expansion of the Group assets and the integration of the renewable energy assets, it is considered necessary to develop a very clear procedure under the ESMS (that can also be included in the SEP) with regard to the department(s) in charge with external grievance management and define clear timelines for each step in the management process. As a separate procedure is in place for workforce grievance management, it is therefore recommended that

the scope of the grievance procedure to be defined under the ESMS and included in the SEP does not include internal grievances but addresses the affected communities.

At GGU Corporate level, the following key performance indicators around the stakeholder engagement and the grievance management process have been defined for the period 2017-2019:

- number and involved stakeholders (public hearings, meetings, consultations, discussions, CSR actions);
- wide spectrum of involved stakeholders: national and local media, local communities, CSOs, national and regional media, scientists and independent experts, relevant Ministries;
- number of initial grievances and complaints;
- number of repeated grievances and complaints;
- number of Court disputes with stakeholders and affected persons;
- number of temporary and permanent jobs created by the Projects;
- number of beneficiaries from the CSR projects;
- number of positive feedbacks from stakeholders on CSR projects;
- cases on constructive collaboration with Projects from stakeholders;
- amount of funds spent for CSR activities.

Subproject audit component

The following presents key performance indicators at GWP level, around the stakeholder engagement and the external grievance management process for 2019. However, information given below is presented as reported by GGU because due to the limited timeframe for the assessment, ERM has not been able to verify if this information is supported by detailed evidence and protocols of such activities:

- number and involved stakeholders (public hearings, meetings, consultations, discussions, CSR actions): since 2016 GWP initiated and organized more than 50 meetings/events involving main stakeholders (totally 2500 participants);
- wide spectrum of involved stakeholders: national and local media, local communities, national and regional media, scientists and independent experts, relevant ministries;
- number of initial grievances and complaints: 87;
- number of repeated grievances and complaints: 0;
- number of court disputes with stakeholders and affected persons: 0;
- number of temporary and permanent jobs created by the projects: 176;
- number of beneficiaries from the CSR projects: GWP CSR projects were reported to be mainly focused on social, environmental and educational aspects. Since 2016, it was reported that GWP CSR projects actively engaged 145000 beneficiaries;
- number of positive feedbacks from stakeholders on CSR projects: 85 000 positive feedbacks was given after CSR projects conducted by GWP since 2016;
- cases on constructive collaboration with projects from stakeholders:
 - GWP in collaboration with Tbilisi City Hall participated in the rehabilitation of several avenues and streets in Tbilisi - Chavchavadze aven., pekini aven, Vekua-khizanishvili, Shartava, Kandelaki streets, Kakheti highway and ext. Within the frame of these projects, GWP renewed the water supply system;
 - rehabilitation project in Varketili 3 by renewing the water supply system;

- environmental activities organized by Tbilisi City Council: renovating squares and planting trees in different districts of the city;
- amount of funds spent for CSR activities: Since 2016, GWP reported having spent approximately 200,000 EUR on CSR projects including social, environmental and educational activities.

The GGU SEP indicates that generally, in the water sector, grievances can be grouped into three main categories:

- complaints caused by short-term water supply interruption/delay during the rehabilitation/construction works;
- complaints caused by noise during the rehabilitation / construction works;
- traffic and walking difficulties on the streets during the rehabilitation/construction works.

A review of some examples of specific grievances received by GWP indicated the following:

- complaints regarding the water quality and pressure of supply;
- grievances related to damages caused by infrastructure failure (e.g. pipe locker, pipelines).

GWP representatives reported that there have also been grievances filed to the Municipality requiring compensation for cases of business interruptions as a result of the street rehabilitation and not necessarily for rehabilitation of pipelines. However, the Municipality dismissed such claims in order to avoid generating precedents for compensation (see details in Section 5.4.5).

With GWP, representatives interviewed were well aware of the process how external grievances are managed. Grievances may be submitted via Facebook, service centres, hotline, website.

Customers applications and complaints submitted from hotline or service centers are registered in GWP Electronic System - Microsoft Dynamics AX, which is also integrated with an electronic journal created by the regulator Georgian National Energy and Water Supply Regulatory Commission (GNERC), which also follows and monitors the process. According to the Resolution on Commercial Service Quality requirements adopted by GNERC in June 2016, GWP, as a registered licensee, have an obligation to receive and register any application form in electronic journal created by the Commission and react within terms regulated for resolution. Upon registration of a grievance in the electronic journal (database), an SMS message is sent to the customer indicating the registration number and date. Then the complaint logged in the system is forwarded electronically to the person designated to be in charge who has 10 ten days to review the complaint. The respective person then acknowledges receipt and proceeds to resolution, having the possibility to contact the complainant if needed. Once a solution is defined, a formal letter is sent to the complainant.

The Customer Care Department is in charge of monitoring complaints and it was reported that there is a defined timeframe for resolution. Additionally, it was reported that the hotline system has the option to call back randomly and verify the level of satisfaction of the customers with how their complaint has been addressed through resolution. Also, the Customer Care Department prepares a regular (monthly) report on the response to complaints sent to the company's management. However, although the process seems to be fairly robust, there is no written procedure in place describing the process milestones and responsibilities as GWP representatives referred to the grievance management procedure included in the Corporate SEP (which does not mention the electronic data base and does not describe the process in detail). GWP needs to develop a written procedure detailing channels in place to receive grievances as well as the process for managing these, with responsibilities and timelines for resolution at each stage and corresponding record keeping. This procedure will build on the External Grievance Procedure to be developed under the GGU ESMS at Corporate level.

GWP has a generic procedure in place which addresses compensation in case of accidental damages (eg business interruption caused by flooding from a pipeline burst). An internal committee

meets in order to assess the damages occurred and address case-by-case compensation. Please refer to Section 5.4.5 for details.

Reporting to Affected Communities

The Stakeholder Engagement Procedure defined under the ESMS indicates that GGU *“should report back to affected communities and explain the actions that the company has taken to address the issues that were identified during the stakeholders’ engagement process, and the outcomes of those actions.”*

Similarly, the Corporate SEP mentions that *“a Project specific annual report summarizing project performance, CLO activities including grievances and updates to the SEP will be produced.”*

GGU representatives reported that GWP has launched the project *“Report to Tbilisi”* since 2017. Within this campaign, GWP reports to the population of Tbilisi and local government on its activities, projects and plans. This campaign consists of weekly and monthly communications about GWP activities through news agencies, television, the company website and social media. It has also been reported that live Facebook sessions are carried out from the sites where works are conducted, providing information on progress. GWP representatives also reported that press-conferences and meetings are held with the members of the community. Additionally, tours at the sites and company’s facilities are periodically organized for journalists, municipality representatives, schools. However, ERM has had no visibility over such documented activities. Overall, it is considered that there is room for improvement in terms of record keeping. Engagement activities need to be properly documented in a register or data base, accompanied with detailed information on venue, date, attendants, questions and answers and feedback received.

GWP reported that they engage external companies every year to assess customer satisfaction. Survey results from 2017, 2018 and 2019, indicate rising customer satisfaction levels every year, understood to be related to the intensive communication campaigns conducted by GWP.

Georgia Capital PLC (GCAP), the investment platform owning GGU published an Annual Report in 2019¹⁰ which includes a section on the water utility business presenting ownership, investment rational, performance record in terms of self-produced electricity consumptions, financial and CAPEX information; this section however does not cover information on the E&S performance.

GGU Corporate and GWP (at subproject level) need to comply with the commitment included in the Corporate SEP and develop a specific annual E&S report (at Corporate and subproject-level), which is to be shared with the relevant affected communities in a manner that is accessible and culturally appropriate. Such activities are to be properly documented and referenced in updated SEPs (Corporate and subproject-level).

5.4.2 Labour and working conditions

GGU has a mature Human Resources function with 26 staff in the corporate function who are responsible for recruitment, administration, evaluation and training of employees. A key challenge for GGU is in attracting and retaining staff with the required technical and engineering skills from within the Georgian labour market. GGU runs a training academy to develop the technical and engineering skills of the local workforce and reportedly have trained around 3000 young people to date.

GGU’s Human Resources Policy Framework requires amendments to align with the ILO Core Labour Standards. The Human Resources Policy Framework includes a Human Resources Policy, Diversity Policy, and Recruitment Policy. Additionally, Georgian Water and Power (GWP) has an Internal Relations document on labour issues. According to management interviews, GGU applies GWP’s

¹⁰ Available here <https://georgiacapital.ge/reports/2019/#page=2>

Internal Relations document across all of its assets. These policies commit to and align with Georgian labour law, which includes protections against child labour. Also, the policies include anti-discrimination and recognize the freedom of association and the right to collective bargaining. However, these policies do not contain a specific commitment to the prohibition of forced labour and child labour. According to management interviews, Georgian labour law is monitored and policies are updated to reflect any changes. Also, all GGU employees, including GWP employees, receive an induction on the human resources policy when they sign their contracts and have access to the policies through GGU's internal intranet system. GGU's Diversity Policy (2020) commits it to non-discrimination in terms of ethnicity, gender, age etc. GGU track the ethnicity and gender of their workforce. Reportedly, 13% of GGU's workforce is ethnic Azerbaijani. The proportion of ethnic minorities is highest around Debeda HPP, which is situated near Georgia's border with Azerbaijan, where 62% of the workforce is ethnic Azerbaijani. GGU does not see gender equality as a management issue. Women make up 13.6% of the company's workforce, including 20% of top management, 27.2% of executive management and 33.3% of middle management. The numbers for GWP are similar, as Women make up 12.8% of the GWP's workforce, including 22.2% of top management, 31.1% of executive management, and 33% of middle management. This is reportedly due to the low numbers of women with technical and engineering backgrounds in the Georgian labour market. There are no specific programmes to promote female recruitment or gender equality in the workplace, or in the value chain. The company has not conducted any internal training on gender or other diversity issues, and does not conduct analysis around pay parity for male and female employees. The company does provide maternity leave and flexible working arrangements for women with childcare duties.

The company does not have at present a gender-sensitive approach to grievance management. Employees are reportedly encouraged to report any sexual harassment issues to the Head of Human Resources who is female; however, this is not specified in the GGU grievance policy. No training has been conducted to date around handling sensitive grievances. That said, GGU is in the process of developing an Anti-Sexual Harassment Policy which is due to be completed on 1 July 2020, and will address these issues.

GGU's formal employee grievance procedure is accessible at all of its sites, including all GWP assets and subassets, and allows for anonymous grievances. GWP does not have a separate procedure. GGU maintains a grievance log that tracks the date of the filed grievance, the type and description of issue, identifies the relevant department, tracks resulting corrective actions, and the date the grievance is closed out. According to management interviews, there have been 93 grievances filed in the last three years and no employee has filed a second grievance. The grievance mechanism requires amendments to align with ADB Standards. That is, the mechanism is not communicated to on-site contractors and historically has not been used by any contractors or subcontractors; the grievance process does not outline timeframes for acknowledging, investigating, and closing out grievances; there is no process determining whether the complainant is satisfied with the outcome of the grievance, nor an appeals process; there is no commitment to non-retribution against those who lodge complaints.

5.4.3 Health and Safety

5.4.3.1 Worker Health and Safety

GWP has a dedicated OHS department consisted of 1 Lead H&S Officer and 7 Field Safety Officers (FSO), who are led by GGU OHS Manager. The responsibility areas of the team is as follows:

- 1 FSO full time present at RWC;
- 1 FSO full time present at GSTP;
- 1 FSO covering 3 HPPs which are under GWP's subassets;

- Remaining 4 Safety Officers are responsible from water and sewage network and they are conducting HS inspections on a daily basis to check the H&S compliance of the existing working conditions.

GWP follows the requirements of GGU OHS Management Plan (which was developed in line with WB and IFC General EHS Guidelines which is supported by several site specific GWP OHS Procedures and Work Instructions. The content of the existing documentation is satisfactory and address the key topics including but not limited to the following:

- Risk Assessment;
- Occupational Health;
- Review and Audit;
- Training;
- Emergency Response;
- Contractor Management;
- Accident and Incident Reporting;
- Permit to Work System
- Working at Confined Spaces;
- Working at Height;
- Excavation Works Instruction;
- Heavy Equipment Lifting and Carriage Instruction;
- Electrical Works Permit Instruction;
- Personal Protective Equipment Usage and Maintenance Instruction;
- Hazardous Substances Usage and Storage Instruction;
- Transport and Traffic Management;
- Water Reservoir Works Instructions; and
- Water Networks ad Well Personel Instructions.

Accident and Incident Reporting

GWP collects accident and near miss statistics regularly on a corporate level. However the Key Performance Indicators (KPIs) are reported on a corporate level including all GGU assets, but not specifying the GWP subassets and operations.

Accidents and near misses measured in Lost Time Injuries (LTIs) are recorded and filed. During the filing process, a detailed description of the event is filled in a standard form which explains the cause, measures taken and possible consequences of the accident.

According to the latest “Annual Health and Safety Report, 2019”, there have been 29 incidents occurred in total and there has been no case which ended up with a fatality. Of the 29 incidents recorded, 20 were associated with GWP operations. Out of the 19, those with highest incidence included trench wall collapse (8 cases), slips trips and falls (3 cases), hand tool use incidents (3 cases), utility line damages during excavation (2 cases), electrical equipment incidents (2 cases) and lifting safety incidents (2 cases). Out of the 20, six incidents involved personal injury while the others were near misses or involved only property damage.

Risk Assessment

Prior to any work commencement task at GWP operations, risk assessments are carried out and there is a particular permit to work system that requires special permits for specific types of work. This of course implies that prior to work commencement all people involved in the procedure are made familiar with all work related aspects, including risks, mitigation measures and possible outcomes. Furthermore, before the actual start tool box talks are carried out that once again summarize the details of work that is about to be carried out.

GWP enables the employees to refuse to carry out and stop the work, task or assignment that contradicts to laws or due to work safety condition neglecting creates vivid and serious threat to his/her or third person's life, health, property or environmental safety. An employee is obliged to inform the employer right away of the conditions that cause him / her to refuse to carry out works defined by the work agreement. As defined by the GGU procedures and plans it is not only the right but also the obligation of each employee to stop work if it is regarded unsafe.

According to the latest "Annual Health and Safety Report, 2019", in total there were 414 Risk Assessments conducted.

Emergency Preparedness and Response

There are Emergency Response Teams in place in GWP responsible for both water distribution and sewage water lines to response in any leakages in the system. Both infrastructures are monitored remotely and Emergency Response Teams are mobilized to the location where there is a failure is identified in the monitoring system.

Steps taken in case of an emergency situation is as follows:

- GWP diagnostic team mobilizes to the relevant site/location and evaluates the situation and secures the site;
- Informs GWP Health and Safety Department;
- GWP Health and Safety Department mobilizes and conducts investigation;
- GWP H&S Department conducted the site-specific risk assessment and defines the mitigation measures to be put in place prior/during and after completion of the work;
- GWP Technical department takes all mitigation measures (including all contracted works as well) and informs the H&S department to request Permit to Work;
- GWP H&S Department inspects the mitigation measures taken and issues Work Permit if the mitigation measures are in place.

Depending on the type and magnitude of the risks, GWP H&S officer is present during execution of all works. In any case, there is an obligation of GWP PM/Site Engineer to be present at site until the works are completed in a safe manner. If it's a contracted work, all GWP requirements apply for the Contractors as well, and Contractors are required to assign a certified H&S expert to be present at site.

Occupational Health

GWP requires all project employees (including all contractors' and sub-contractors' employees) to be medically screened prior to recruitment to ensure that all employees are medically fit to undertake their occupation.

Copies of all medical certificates are held by the project management team. If the personal health problem poses a threat to the other workers or the individual himself, they are removed from the worksite, until such time as the personal health problem is corrected.

While GWP has first – aiders at site, GWP also requires the Contractors to assign certified first aiders within their contractual workforce permanently existed on the worksite.

Training/Tool-Box Talks

GWP requires all employees (including all contractors' and sub-contractors' employees) to be trained on the principles and applications of GWP's H&S requirements before commencement of works.

In addition to the induction training, prior to commencement of any work, the respective operation manager and/or construction manager on daily basis forms the relevant site employees on the following topics via Tool-Box Talks:

- The working conditions at the Site, including the hazards and risks associated with the works and the H&S management procedures used as safeguards, including without limitation the H&S Plan.
- The need to immediately notify their supervisor of all H&S risks, which they believe not to be under adequate control.

Inspections and Reporting

GWP H&S team conducts daily site inspections using "Daily Inspection Checklists" which was prepared as a part of GGU's Corporate OHS Management Plan and reports to the Head of H&S department.

The findings of the inspections are compiled on a weekly and monthly basis, and the relevant reports are submitted to Department Heads and Directors.

The reports mainly include the following topics:

- Incidents;
- Non-conformances;
- Planned H&S activities;
- Conducted H&S activities;
- Key Performance Indicators; and
- Corrective and preventive actions taken.

Incident & Near-Miss Reports: All GWP personnel are responsible for reporting all HSE incidents and near misses. The incidents and near miss reports are submitted by Operator/Contractor to GWP H&S Department within 24 hours.

Contractor Management

GGU has a corporate level Contractor Management Plan which is also applicable to GWP operations as well. The plan outlines how to manage the risks arising from the Contractor(s) activities and compliance with GGU and GWP H&S standards. The plan aims to enable Project Managers, Procurement/Contract Managers, Project Supervisors and the ESHS Managers to develop a good understanding of the Contract and the responsibilities of the parties involved, and establish a system that helps to monitor Contractor(s) activities.

The plan mainly includes the following topics:

- assessing the contractors health, safety and environmental arrangements prior to engagement;
- ensuring hazards associated with proposed contract work are identified;
- communicating safe work requirements for the work to be performed;
- assessing potential contractors and only awarding contracts to those who can perform safe work;
- briefing all contractors prior to work commencing, including details of relevant safe work procedures;

- monitoring the work of contractors during the contract; and
- evaluating the work of contractors at the end of the contract.

5.4.3.2 Community Health and Safety

GWP Water and Sewage Network

GGU operates approximately 3000 km of water pipeline network and approximately 2000 km of wastewater pipeline network former administered by the Ministry of Environment and Natural Resources Protection of Georgia.

Main risks associated with GWP's activities include the following risks based on the "GGU Environmental and Social Policy Framework":

- Contamination of water, either from man-made sources or from naturally-occurring compounds may result in the interruption of service and/or exposure of humans to hazardous substances.
- Usage of gaseous chlorine deposited in gas tanks for water purification which bears a risk of explosion that may threaten human lives and result in substantial environmental damage.
- Water supply network is partly amortized; as a result, the Company has high accident probability and is exposed to grid disruption, which may lead to adverse environmental and social impacts.

Associated with the above risks, GGU has received environmental fines in 2019 at Water and Sewage Network due to:

- Spill out of wastewater from a damaged sewage collector.
- Accidents on the network due to old infrastructure ending up with environmental pollution by the leaking sewage.
- Intentional damage of the collector in rural areas by the communities who want to use the water for irrigation purposes on their agricultural lands.
- Illegal industrial wastewater discharge by third parties into GWP sewage network.

GGU stated that the following actions have been taken by GWP to mitigate the relevant non-compliances:

- GWP has a rehabilitation plan in place aiming final recovery of the network.
- GWP supported the government during development of the regulation on "Rules and Maximum Permissible Norms of Pollutant Substances Discharging into Waste Water Sewage System which has been in force in 2018 to prevent illegal discharges from third parties.
- GWP listed the potential polluters (industries) along the sewage network alignment and informed them about the new regulation and the requirements of the discharge to GWP sewage system.
- GWP is using geo-radar technologies to detect underground communications before construction and reconstruction works.

GGU has generic "Community Health, Safety and Security Management Plan" is in place, which has been prepared in line with WB/IFC General EHS Guidelines and the IFC "Sector EHS Guidelines – Water and Sanitation". The plan covers the following main topics:

- Infrastructure and Equipment Design and Safety;
- Hazardous Materials Management and Safety;
- Community Exposure to Disease;
- Emergency Preparedness and Response;

- Security Personnel;
- Water Intake (Water Sources) Protection;
- Water Treatment;
- Hazardous Chemicals;
- Water Distribution;
- Sewage Collection;
- WWTP - Wastewater and Sewage Treatment;
- Air Emissions and Odor;
- Physical Hazards.

The plan also lists the following actions to be taken during execution of the works to mitigate the potential negative impacts on community health and safety:

- Installation of safety, warning, restrictive and pointing signs near the construction sites or the relevant places going from the construction sites or the site to the main road;
- Ensuring proper technical functioning of the construction machinery and vehicles;
- Dust suppression of the roads in the dry and windy weather once in four hours;
- Covering the trucks by tent to prevent dust generation in traffic;
- Restriction of the speed limits;
- Washing the vehicle wheels before moving to the public roads;
- Providing instructions for the personnel (particularly the vehicles and machinery drivers) before commencement of the works;
- Selection of the optimal access routes to the working section;
- Restricting the movement of the vehicles on the public roads;
- Maximal rehabilitation of all the damaged sections of the road, to make it available for the community;
- Traffic control by flagmen in case of necessity;
- Control and restriction of the unauthorized entry of trespassers into the construction sites; and
- Regular risk assessment for identification of the concrete risk factors for the population and for the purpose of relevant management of such risks.

GGU has developed a Stakeholder Engagement Plan (SEP) describing how the Company will build relationships and communicate with people and institutions who may be affected by, or interested in GGU's performance or its specific projects, at various stages of projects preparation and implementation. The GGU SEP also includes a public grievance mechanism for stakeholders to raise any concerns related to GGU performance or specific projects, and receive appropriate response and action of the Company to address the issue.

GWP has internal and external communication system in place in case water supply interruptions are needed for repairs and rehabilitation works. GWP uses TV channels, social media, short message service and public announcements to inform the community 3 days before about the planned water cuts.

Water interruptions are planned to be as short as possible and up to date they never experienced water supply interruption more than 1 day.

GWP has identified and prioritised the risky¹¹ areas where the water delivery line or sewage line may lead to flooding and damage the infrastructure or agricultural land that may end up with impacts on community health effects, injuries, impacts to mental wellbeing from property loss, propagation of infectious diseases; nutrition.

There is a zoning project indicating where there are high leakages. GWP is prioritizing the rehabilitation works in accordance with the most amortized network where there are too much risks.

GWP initiated permit to work system with regard to rehabilitation of the existing infrastructures. GWP supervises all rehabilitation works and checks all reconnection places prior to any repairs and rehabilitation works to make sure that adequate measures, resources and materials are in place.

GWP has insurance policy that covers the damages on the community loss as well.

GWP has patrolling teams in place to monitor trunk lines on daily basis for 24 hours. Since there are requirements and norms on the allowed distance to the network, the patrolling team is checking if there are any violations. In case a violation is observed (such as existence of a building structure which is not in line with permitted distance), the stakeholder is being informed via official letter sent by GWP to take mitigation measures.

There are Emergency Response Teams in place in GWP responsible for both water distribution and sewage water lines to response in any leakages in the system. Both infrastructures are monitored remotely and Emergency Response Teams are mobilized to the location where there is a failure is identified in the monitoring system.

GWP has three types of Security Contracts:

- Armed security forces securing sensitive assets (such as big dams and sensitive water lines) securing with state owned company (under Ministry of Internal Affairs)
- Internal security to secure GWP's offices (non-armed and GWP's employees)
- Temporary contract-based security services to secure the construction sites and equipment.
- There is no Security Management Plan in place in line with UCHCR's Basic Principles on the Use of Force for use of Project security personnel, including training on use of force, worker background screening and no training was given to the security forces on Human Rights.
- Up to date, there has been no incident experienced with regard to misuse of force against human rights.

GGU's Covid 19 Response

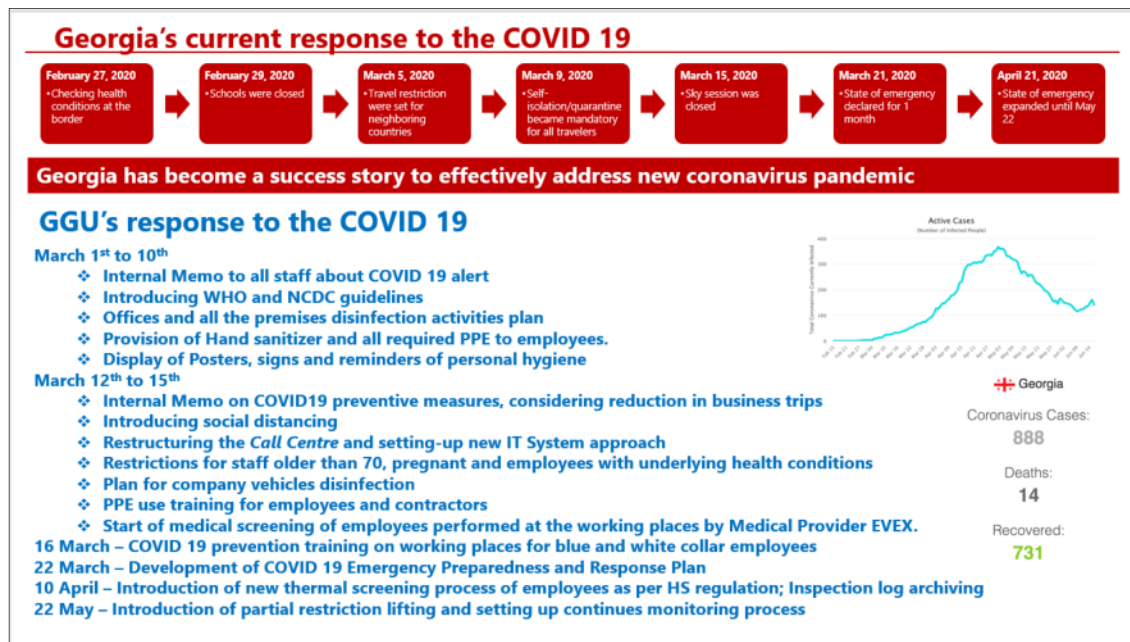
GGU had 1 infected employee working at one of the pump stations at the water distribution system. Since the employee was working in a remote area, he only interacted with 8 employees and all the relevant employees were identified and Covid 19 tests were conducted. Apart from the infected employee, the rest of the employees' tests results were negative. The infected employee was recovered after medical treatment and he's been back to work.

GGU has extended Covid 19 response not only including their own employees but also including the Contractors as well. GGU conducted Covid 19 audit at Mestiachala 1 site on the Contractor.

The following figure represents the GGU's Covid 19 response:

¹¹ These are the sites where the existing old network system needs to be rehabilitated before the other sections due to the potential leakage and failure risks.

Figure 5-5 GGU Covid 19 response



Source: GGU

5.4.4 Involuntary Resettlement

Corporate level

GGU representatives reported that the company is committed to not resorting to expropriation under any circumstances although this remains an option under Georgian laws and regulations in case any of the projects would be considered of national interest. Although their commitment is very firm, GGU has expropriation as a fall back if negotiations fail, which constitutes involuntary resettlement as per ADB SPS 2 (DB SR2 Section 4. Para 25). GGU confirmed that none of their Projects have been classified as of national interest. According to GGU representatives, their commitment is to always acquire land rights through negotiated settlements (willing buyer / seller) with the objective of avoiding resorting to expropriation. However, for assets for which land acquisition was not managed by GGU this commitment could not be confirmed.

However, GGU does not have a Land Acquisition and Compensation policy/procedure that governs acquisition of land rights for their projects and defines approach to eligibility and compensation in alignment with ADB SR2 standards. GGU representatives reported that the acquisition of land is done in line with Georgian laws and regulations and based on good faith negotiation. GGU has as part of their corporate policy to deliver benefits to the communities.

Only the land acquisition and compensation process for Mestiachala 1&2 HPP has been managed entirely by GGU while land acquisition process for Akhmeta, Kasleti, Debeda HHPs and Quartli wind farm were implemented prior to the acquisition of Hydrolea and the Georgian Energy Development Fund (GEDF) in 2019. Land acquisition in relation to Georgian Water and Power LLC has been managed by GGU since 2016. In all instances, the acquisition of land rights was implemented following Georgian legislation. No physical displacement has resulted from the acquisition of land for any of the assets. However, the assessment regarding potential impacts to local livelihoods due to

acquisition of state and municipal land requires further assessment. The current assessment as presented in the ESAPs (2020-2024) conclude that ADB SR2 is not triggered for any of the assets.

It is recommended for GGU to develop a screening process for involuntary resettlement and a procedure for Land Acquisition and Compensation in alignment with ADB SR2 standards. The procedure should guide all land acquisitions including temporary access needs and Right of Way on public or private easements to be implemented by the company.

Subproject Audit Component

Neither GGU nor GWP have a formal procedure to screen for or guide activities with regard to the temporary or permanent acquisition of land, including definition of the processes for assessing and compensating for loss of land and livelihoods.

Since the acquisition of Georgian Water and Power LLC (GWP) in 2016, the company has managed the acquisition of 14 urban and periurban land plots for the establishment of small pumping stations (500 square meters on average). All lands acquired since 2016 with the exception of two land plots were acquired from Tbilisi Municipality via public auctions. The two private plots were purchased from a golf resort under a voluntary buyer seller agreement for the purpose of constructing a reservoir (reservoir construction will not be part of the scope of works utilising ADB financing).

GWP confirmed that to date the acquisition of municipal land for the establishment of pumping stations has not resulted in involuntary resettlement impacts. GWP implemented a detailed site selection process to ensure that selected plots were not under residential or agricultural use despite municipal ownership. GWP is committed to continue implementing such detailed site selection process to avoid involuntary resettlement going forward. It is noted however that GWP does not have a procedure for land acquisition and compensation which defines clear process for screening and auditing. In this regard the avoidance of involuntary resettlement (land users with no ownership rights) is not formalised but based on company good practice. GWP representatives confirmed that all lands acquired to date are vacant but in the absence of a formal audit process, this could not be confirmed. It is noted that land plots are of small size but nevertheless impacts could occur if these were used informally by local residents.

GGU confirmed that management of temporary impacts on land and livelihoods due to ongoing rehabilitation of water supply infrastructures are managed in coordination with the concerned municipality. Dissemination of information to potentially affected customers is managed by the Public Relations and the Customer Care Department at GWP through a well structured process which involves company website, Facebook, TV, and individual SMS contact. In Section 5.3.1 are provided details on how is GWP disseminating information to potentially affected customers. GWP has also a well established grievance management system (refer to Section 5.3.1). All complaints as a result of rehabilitation works including those that affect business and livelihood activities are monitored by the Customer Care Service. In cases when affected people make a claim which involves compensation, these claims are dealt with on a case by case basis and compensation is provided upon careful evaluation. GGU confirmed that there is no standard procedure for assessing and determining compensation, however, a committee whose membership includes representatives of the operations, commercial, financial and legal team at GWP evaluates compensation quantum. GGU representatives reported that the company strives to ensure good faith negotiation in providing compensation in case of losses.

Additionally, the land access for rehabilitation works is managed by the Municipality, and GWP reports rehabilitation priorities and is the Municipality the one that plans and coordinate all the different utility companies. In line with Georgian laws and regulations no compensation is foreseen in relation to such rehabilitation works. Although rehabilitation works could result in temporary economic impacts (i.e. loss of income due to water interruption) these are managed through a standardised process by GWP in case of negligence which can be considered a good embedded mitigation to reduce risks and impact. GWP is however responding to grievances in case of disruption and has considered

compensation on a case by case basis. The process for determining compensation for damages that could result in loss of income is managed by an internal committee that handles these grievances and determines compensation. According to GWP's grievance management procedure, grievances should be responded within a set timeframe (although the Company has a very good channels in place for people to lodge grievances, with good understanding of all the steps to address them, this process should be better documented, eg. the external grievance management current procedure is required to be further amended and improved, and then adopted at asset level) (Please refer to Section **Error! Reference source not found.** for detail account in relation to grievance management).

It is recommended for GWP develop a procedure for involuntary resettlement screening and Land Acquisition and Compensation in alignment with ADB SPS SR2. The screening procedure should allow GGU to define activities that will result in involuntary resettlement, and in line with the IR categorisation of this review, avoid use of ADB finances that result in IR impacts. The procedure should define appropriate measures to ensure that the acquisition of municipal land considers the right to compensation of all potential land users including those that do not have legitimate land rights as defined in ADB SR2 standards.

5.4.5 Biodiversity Conservation and Sustainable Natural Resource Management

Corporate Level

Although GGU has a Corporate ESMS in place, it does not have a strategic approach to biodiversity, on key biodiversity issues such as biodiversity risk assessment and management, no net loss and net gain, invasive non-native species, and monitoring programmes and protocols. It is necessary to develop overarching policies to address the previously listed key biodiversity issues and to also build the internal capacity to develop and implement such policies.

Subproject Audit Component

The GWP network infrastructure components overlap the area of Tbilisi, the capital of Georgia, and neighbouring villages. Therefore, the GWP subproject components are located in modified habitat and highly modified habitat (i.e. constructed land), having low biodiversity value.

Project operation activities related to the network infrastructure do not overlap any legally protected areas. Environmental Impact Assessments have not been undertaken for the GWP subproject components, as this was not required by the Georgian law.

Given the modified and highly modified habitat, issues that may occur from rehabilitation works and / or installation of new water connections are unlikely to have a significant effect on biodiversity provided adequate pollution prevention and control measures are in place and screening of projects for biodiversity issues is undertaken. The development of a Non-Native Invasive Species plan is recommended both for biodiversity and operational safeguarding reasons. Assessment of leakage rates, and if necessary, corrective action to reduce this are recommended for sustainable resource management purposes.

5.4.6 Indigenous peoples

ADB SPS SR3 is screened out of the Assessment because the GWP activities to be financed by ADB, are located within Tbilisi and neighbouring areas, in an urban environment, and Tbilisi does not have any vulnerable communities of Indigenous Peoples or ethnic minorities.

However, neither GGU nor GWP have a formal procedure to screen for or guide activities with regard to Indigenous Peoples.

5.4.7 Physical Cultural Resources

Corporate level

In reviewing the approach taken to assessing the impact to the Cultural heritage, it has been stated that GGU have adhered to Georgian Cultral Heritage laws and requirements for construction projects, and that all necessary permits have been obtained.

However, for some assets where an EIA has been produced, adequate baseline surveys by cultural heritage specialists were not undertaken. In some instances, when archaeological investigations have taken place, the information was not incorporated into the EIAs.

It is recommended that GGU produce a Cultural Heritage Management Plan and a Chance Finds procedure that can be implemented by future projects.

Subproject Audit Component

GWP does not have procedures in place that can assist with the identification and conservation of physical cultural resources. As such, for the proposed network maintenance activities, a Chance Finds Procedure will need to be developed.

5.5 E&S Gaps Identified

Based on the review of documents and management interviews, E&S gaps and weaknesses identified throughout the course of the E&S Gap Analysis are summarised below.

Explanations to the E&S Findings Table:

Topics & Aspects: Environmental and Social topics and aspects based on the and the ADB SPS Safeguard Requirements.

Comment/Observation: Context and project specific information relevant to the E&S Gap Analysis.

Gap & Weakness: Description of deficiencies against the requirements set forth by the ADB SPS SRs.

Level of Compliance with ADB requirements: Compliant or Non-Compliant.

Corrective Action: Actionable measures to address identified gaps and weaknesses to satisfy E&S requirements of ADB.

Table 5-3 E&S Findings Table

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
Environmental and Social Assessment and Management				
Environmental and Social Management System	GGU Corporate ESMS in place provides an overall framework for E&S management. It requires improvement and further development.	GGU Corporate level management plans require improvement to align with best practice principles	Partially Compliant	It is required to develop, incorporate and implement a safeguard screening and categorisation procedure for environment, involuntary resettlement and indigenous peoples consistent with the requirements of ADB SPS and in order to avoid project impacts which may be categorized as Cat A for Environment, Cat A and B for IR and IP.
			N/A	<p>It is recommended to amend the Transport Management Plan to include requirement for site-specific Access Roads & Transport Management Plan development and implementation at each construction site. The site-specific management plans are to be fit for purpose and address specific traffic issues as needed.</p> <p>It is recommended to amend the Water, Energy and Resources Management Plan to detail the processes/measures in place to attain set construction and demolition materials recovery targets and the key performance indicators considered for tracking the implementation.</p> <p>It is recommended to amend the Non-conformance Preventive and Corrective Action Procedure to include requirement for maintaining a non-conformance tracking register (non-conformance log) on</p>

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
				project/construction site and operations basis. As a minimum the register is to document as a minimum the issue (non-conformance) identified, date of occurrence, issue categorization (e.g. as safety/environmental/social issue), response action and implementation responsibilities, status (e.g. as open or closed), date of closure and reference document (e.g. Corrective Action Request Form number and/or reference to other files documenting actions implemented).
Environmental and Social Management System	GWP Management plans to be developed and implemented at GWP level		N/A	It is recommended to: <ul style="list-style-type: none"> ■ develop and implement GWP Water Management Plan, in line with the Corporate Water, Energy and Resources Management Plan Management Plan requirements; ■ develop and implement GWP Energy Management Plan, in line with the Corporate Water, Energy and Resources Management Plan Management Plan requirements.
Climate Risks	GWP ADB SPS require an environmental assessment for each proposed project to identify impacts, including those related to climate change.	ERM has had no visibility over documents providing evidence that the GWP has completed a climate change risk assessment.	N/A	It is recommended to conduct a physical climate change risk screening covering the GWP operations to identify any potential operational exposures to chronic and acute physical climate risks. It would be proposed that undertaking this type of assessment would take up to 4 weeks. Where risks screening identifies possible material risks, undertake further assessment work using scenarios based assessment of risks in present and future, using a recognised climate change trends dataset

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
				<p>(e.g. IPCC or similar source) and a robust risk assessment approach (e.g. risks review or bowtie analysis). The time required for this to be completed would be dependent on the type of hazards identified during the screening, but would be expected to be completed within several weeks or more.</p> <p>Provide evidence of plans, processes and policies in place/ planned for implementation, to manage climate-related physical and transition risks to the project at the construction and operation phase.</p>
Training	<p>Corporate Level</p> <p>Implementation of an ESHS Training Plan including provision of a Training Matrix for tracking training needs and training delivery by positions and staff members, according to GGU ESMS Training, Awareness and Competence Procedure requirements.</p>	An ESHS Training Plan including Training Matrix system is yet to be implemented.	Compliant	<p>It is recommended to improve the ESMS Training, Awareness and Competence Procedure to outline how the specific job and skill related certification and competency is being assessed and managed and clarify how are the critical E&S, safety positions deemed competent for their roles.</p> <p>It is also recommended to develop and implement a Training Plan including a Training Needs Analysis and a Job Competency Matrix or similar to ensure that all personal (including Contractors staff) are adequately trained, licensed/certificated and competent for their positions.</p>
Monitoring and Review/ Reporting	<p>E&S monitoring is performed by site-based personnel with E&S responsibilities and through scheduled site inspections by the corporate E&S management staff.</p> <p>E&S reporting includes Incident and Near-Miss Reports, Site inspection Reports, Monthly E&S Performance reports and external E&S reporting.</p>	N/A	N/A	N/A

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
Stakeholder Analysis and Engagement Planning & Information Disclosure & Consultation	GGU Corporate The Stakeholder Engagement Procedure defined under the GGU ESMS refers to the GGU Stakeholder Engagement Plan (SEP) developed as a separate document, as part of the Company's management programs.	The SEP needs to be significantly amended as a results of the expansion of the portfolio of assets, change in regulations, need to clarify roles and responsibilities and amend the grievance management process to align it to international requirements.	Partially-compliant	Amend the Corporate SEP to: <ul style="list-style-type: none"> ■ update the description of GGU activities and portfolio of assets; ■ present revised Georgian EIA requirements; ■ revisit the stakeholder identification and analysis; ■ define clear milestones for engagement at every stage of a project lifetime; ■ define methods and tools for engagement; ■ clearly present roles and responsibilities for stakeholder engagement at Corporate level as well as how these tie in with responsibilities at local facility and GWP level; ■ include a very clear procedure with regard to external grievance management. Amend the Contractor Management Plan to formally require contractors to appoint a person in charge for stakeholder engagement and grievance management. Also, contractor staff with these responsibilities needs to be trained with regard to stakeholder engagement and the grievance management processes defined as part of GGU ESMS. Train all relevant (Corporate-level and subproject-level) staff and relevant contractor staff with responsibilities related to stakeholder engagement and grievance management. Develop a specific SEP for each subproject/asset under GGU.

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
Stakeholder Analysis and Engagement Planning & Information Disclosure & Consultation	GWP GWP relies on the Corporate SEP.	GWP does not have a specific SEP with a planned Engagement Program to achieve meaningful consultation.	Partially-compliant	<p>Develop a SEP for GWP to plan engagement with the relevant stakeholders (communities, industrial operators) with the intent to:</p> <ul style="list-style-type: none"> raise awareness of the grievance redress mechanism and channels available to lodge grievances; disclose and consult on network expansion projects; address intentional damage of the collector in rural areas by the communities who want to use the water for irrigation purposes on their agricultural lands; address illegal industrial wastewater discharge by third parties into GWP sewage network. <p>Include in the specific GWP-level SEP a commitment regarding disclosure of an Annual E&S Report to the population of in Tbilisi and neighbouring communities.</p> <p>Develop an annual report on the E&S performance of GWP and share it with the population in Tbilisi and neighbouring communities.</p> <p>Engage with the local communities to monitor the level of satisfaction with the E&S performance of the company.</p> <p>Document such reporting activities and reference them and feedback received in an updated SEP.</p>
External Communications	The E&S Policy Framework mentions a Communication and Notification Procedure “to ensure that there is clear communication on environmental and social issues within GGU management, as well as with contractors, community	ERM has had no visibility over such Procedure.	N/A	It is recommended to develop an External Communication Procedure at GGU Corporate level, as part of the ESMS, to ensure that external communications relating to the E&S performance of the company are dealt with professionally and effectively. This procedure

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
	and stakeholders; and a system for receiving, documenting and responding to relevant communication or grievances from external interested/affected parties, based on Stakeholders Engagement Plan."			should define and help maintain a publicly available and easily accessible channel for members of the public to be able to contact GGU and the relevant entities within (e.g. through a phone number, website, or email address). This procedure is different from the grievance mechanism which is usually targeting adversely impacting stakeholders so that the company can address complaints that may arise. This Corporate External Communication Procedure is then to be transposed at every subproject-level.
External Grievance Redress Mechanism	GGU Corporate Chapter 7 of the Corporate SEP, on the <i>Grievance Redress Mechanism</i> , is quite generic and allows for improvement in terms of clearly defining which department and staff is in charge to receive grievances, log and follow them through resolution. The SEP indicates that when receiving a grievance, GGU would assign someone to be responsible for resolving the grievance.	The Corporate <i>Grievance Redress Mechanism</i> and local-level processes included in the existing SEPs lack clear responsibilities and timelines assigned for each step in the management process. Grievances appear to be managed on an ad hoc basis, particularly at facility-level and even more so at the level of the recently acquired assets (Akhmeta, Debeda, Kasleti 2 HPPs and Qartli WF). The grievance mechanism at the level of these assets has not been updated after acquisition by GGU.	Partially-compliant	Develop a very clear External Grievance Management Procedure under the ESMS (to also be included in the SEP) to: <ul style="list-style-type: none"> ■ specify all the relevant channels available for filing grievances; ■ clearly assign responsibilities to divisions/ departments and functions within the Company for managing grievances at each step; ■ define timelines for each step in the grievance management process from receipt through resolution and seeking feedback from the grievance and closure; ■ required documentation/records to be kept and responsibilities for record keeping; ■ process and responsibilities for escalation in case of unresolved or complex grievances; ■ be adopted and implemented at every asset-level, with clear indication of how roles may change depending on local

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
				<p>organisation around grievance management.</p> <p>A separate procedure is in place for workforce grievance management and it is therefore recommended that the scope of the grievance procedure to be defined does not include internal grievances.</p> <p>Disseminate this procedure to all the departments and staff (at both Corporate and facility-level) with responsibilities related to grievance management and to the relevant contractor staff.</p> <p>Cascade this Grievance Management Procedure at subproject level, with clear timelines and responsibilities at each stage of the process and reflect it into the subproject-level SEPs.</p> <p>Monitor the effectiveness of the grievance management procedure to determine the need for changes to the process.</p>
Grievance Redress Mechanism	GWP There is a robust system in place with multiple channels available for the population to lodge grievances.	There is no written procedure in place describing the process milestones and responsibilities as GWP representatives referred to the grievance management procedure included in the Corporate SEP.	Partially-compliant	Develop a written procedure detailing channels in place to receive grievances as well as the process for managing these, with responsibilities and timelines for resolution at each stage and corresponding record keeping. This procedure will build on the External Grievance Procedure to be developed under the GGU ESMS at Corporate level.
Reporting to Affected Communities	GGU Corporate The Stakeholder Engagement Procedure defined under the ESMS and the Corporate SEP include requirements related to reporting to affected communities.	ERM has not had visibility of any such E&S reports being prepared at Corporate level and shared with the relevant affected communities.	Partially-compliant	Include in the amended GGU SEP a commitment regarding disclosure of an Annual E&S Report for every subproject/asset to the affected communities in a manner that is accessible and culturally appropriate.

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
				Coordinate the development of Annual E&S Reports for every subproject/asset and their disclosure to the affected communities.
Labour and Working Conditions				
Human Resources Policies and Procedures	<p>GGU reportedly has a policy framework which includes: Human Resources Policy Diversity Policy Recruitment Policy</p> <p>GWP, which is the company's biggest asset also has an 'Internal Regulations' document on labour issues, which is compliant with Georgian law.</p> <p>Human Resources (HR) Department is mature, with 26 employees at the corporate level, who manage recruitment, administration, labour relationships and development and training for the Group. The HR department has training programmes to upskill the local labour force for technical and engineering roles. The HR department reportedly conducts annual employee surveys.</p>	The Human Resources Policy and Recruitment Policy are for GWP (rather than GGU). According to management interview, GGU applies GWP policies across the entire group. However, this is not explicitly stated in any policy documentation.	Partially-compliant	<p>GGU: Amend Human Resources Policy to include explicit commitment to ILO Core Labour Standards (CLS) r.</p> <p>GWP: Adopt and implement GGU's amended Human Resources Policy that includes commitment to ILO CLS</p>
Working Conditions and Terms of Employment	<p>According to management interview, all employees have employment contracts aligned with the Georgian labour code. One example employee contract was provided to ERM.</p> <p>GWP's Internal Regulation also outlines working conditions and terms of employment in accordance with Georgia's</p>	<p>The employee contract and GWP internal regulation documentation does not outline the overtime pay rate.</p> <p>GGU has no specific standards around worker accommodation or process to monitor conditions at</p>	Compliant	No action is required.

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
	labour code, including related to hours of work, compensation and benefits. Worker accommodation is not provided apart from at one site, Kasleti HPP, which has on-site accommodation for 3 workers.	this small on-site accommodation facility. Information on wage levels was not provided to ERM.		
Workers' Organizations	GGU and GWP recognise trade unions, and 35.4% of GGU's workforce and 36.4% of GWP's workforce is unionised. The company has a full time trade union representative at the office.		Compliant	No action required.
Non-discrimination and Equal opportunity	GGU's Diversity Policy (2020) commits it to non-discrimination in terms of ethnicity, gender, age etc. Reportedly, 13% of GGU's workforce is ethnic Azerbaijani. The proportion of ethnic minorities is highest around Debeda HPP, where 62% of the workforce is ethnic Azerbaijani. GGU does not see gender equality as a management issue. Women make up 13.6% of the company's workforce, including 20% of top management, 27.2% of executive management and 33.3% of middle management. This is reportedly due to the low numbers of women with technical and engineering backgrounds in the Georgian labour market. GGU is reportedly in the process of developing a policy around Sexual Harassment, which is due to be completed on 1 July 2020.	ERM has not had visibility of any processes to integrate their policy commitment into company processes for promote non-discrimination in the workplace.	Compliant	No action required.
Worker Grievance mechanism	GGU has a workers' grievance policy in place, people can make claims through their HR supervisor, through email or	The grievance mechanism is not communicated to on-site	Partially-compliant	GGU: Amend the workers' grievance process to explicitly state that contractors can should use the process; outline timeframes for

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
	<p>through grievance boxes at all GGU sites. People can also make anonymous claim through email. Site managers are responsible for collecting grievances from grievance boxes once per week, and reporting these to Human Resources. According to management interview, employees are made aware of the grievance process through the company's induction training.</p> <p>93 grievances were reportedly submitted in the last three years by employees, reportedly related to issues including workplace changes, schedule changes, etc.</p> <p>GGU maintains a grievance log that tracks the date of the filed grievance, the type and description of issue, identifies the relevant department, tracks resulting corrective actions, and the date the grievance is closed.</p>	<p>contractors and historically has not been used by any contractors.</p> <p>The grievance process does not outline timeframes for acknowledging, investigating, and closing out grievances. There is no process determining whether the complainant is satisfied with the outcome of the grievance, nor an appeals process.</p> <p>It is not clear whether the grievance mechanism is appropriate for handling sensitive grievances, such as sexual harassment. Employees are reportedly encouraged to report any sexual harassment issues to the Head of Human Resources who is female; however this is not specified in the GGU grievance policy. No training has been conducted to date around handling sensitive grievances. GGU is in the process of developing an Anti-Sexual Harassment Policy.</p>		<p>acknowledging, investigating, and closing out grievances; include a specific commitment to non-retaliation against complainants.</p> <p>GGU: As part of the planned roll out of the Anti-Sexual Harassment Policy, explicitly outline how employees should lodge complaints related to sexual harassment, in a manner that is accessible, and without fear of retribution.</p> <p>GWP: Require contractors to inform all workers that they have access to GGU's grievance policy when operating on GWP assets.</p>
Workers Engaged by Third Parties	GGU's Contractor Management Plan governs interactions with contracted workers. The contractor management plan requires that GGU assesses EHS capacity of any contractors prior to engagement; identifies any hazards associated with work and communicate	GGU does not monitor labour and working conditions of workers engaged by third parties on its sites, aside from on H&S. However, H&S is considered to be the most material risk.	Partially-compliant	<p>GGU: Include commitment to ILO CLS in contractor covenant.</p> <p>GGU: Develop monitoring and audit program that ascertains contractors' compliance, and any subcontractors, with Georgian labour law and ILO CLS.</p>

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
	<p>safe requirements to contractors before work commencement; monitor contractors during work and evaluate their performance following the end of the contract.</p> <p>GGU requires contractors to acknowledge the requirements of their ESMP before commencing work in their contractual agreements, and to comply with Georgian labour law however, fails to explicitly communicate expectations for the prohibition of child and forced labour.</p> <p>Reportedly, GGU only has two live contracts with subcontractor companies; Vestas for operations and maintenance at Qaartli wind farm, and a rehabilitation subcontractor at Mestiachala 1.</p> <p>GGU reports that each site has a dedicated EHS 'lead' or 'champion' who provides oversight over subcontractor performance on EHS issues.</p>			
Pollution Prevention and Abatement				
Resource Efficiency (Greenhouse gases/ water consumption)	<p>GWP</p> <p>GGU's generic "Water, Energy and Resources Management Plan (WERMP)" refers to the development of the following additional plans which were not available for ERM's review during this Assignment:</p> <ul style="list-style-type: none"> ■ Water Management Plan; ■ Energy Efficiency Plan. 	SPS section VI	N/A	<p>It is recommended to develop a GWP Specific Water Management Plan defining the set of measures and activities in order to preserve both surface and ground water quality and quantity.</p> <p>It is recommended to develop a GWP Specific Energy Efficiency Plan covering organizational commitments, energy management team, facility assessments, energy management and implementation plan.</p>

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
Waste, Hazardous Material Management and Pollution Prevention	<p>GWP GWP developed site specific Waste Management Plan in line with local regulations and WB/IFC General EHS Guidelines.</p> <p>The WMP includes 3 year planning of the wastes generated, storage methods, disposal methods, the usage of certified of waste transportation and disposal facilities.</p>	SPS section VI	Compliant	No action required.
	<p>GWP GWP follows the requirements of Spill Prevention and Response defined in GGU Pollution Prevention Plan and GGU ESMS Procedures.</p>	SPS section VI	Partially-compliant	Develop GWP Specific Spill Prevention and Response plans providing site specific information considering the consequences of a potential hydrocarbon spill that may pollute a sensitive receptor (ecological sensitive areas, freshwater sources, reservoirs, rivers, etc).
Health and Safety				
GWP				
Occupational Health and Safety	GWP collects accident and near miss statistics regularly on a corporate level. However, the Key Performance Indicators (KPIs) are reported on a corporate level including all GGU assets, but not specifying the GWP subassets and operations.	SPS section IV	Partially-compliant	<ul style="list-style-type: none"> Collect and report KPIs specifically covering only GWP operations.
Risk Assessment	Prior to any work commencement task at GWP operations, risk assessments are carried out and there is a particular permit to work system that requires special permits for specific types of work. This of course implies that prior to work	SPS section IV	Compliant	No action required.

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
OHS Management Plan	<p>commencement all people involved in the procedure are made familiar with all work related aspects, including risks, mitigation measures and possible outcomes.</p> <p>GWP follows the requirements of GGU OHS Management Plan (which was developed in line with WB and IFC General EHS Guidelines which is supported by several site specific GWP OHS Procedures and Work Instructions.</p> <p>Whilst the content of the GGU OHS Management Plan is satisfactory and address the key topics, a specific GWP OHS Management Plan focusing specifically on GWP operations and risks is missing.</p>	SPS section IV	Partially-compliant	<ul style="list-style-type: none"> Enhance the GWP OHS Management Plan to include specific measures focused on the network rehabilitation work and support the plan with the existing GWP specific OHS procedures.
Community Health and Safety	GWP has identified and prioritized the risky ¹² areas where the water delivery line or sewage line may lead to flooding and damage the infrastructure or agricultural land that may end up with impacts on community health effects, injuries, impacts to mental wellbeing from property loss, propagation of infectious diseases.	SPS section IV	Non-compliant	<p>It is required to develop and implement GWP Operations Community Health and Safety Management Plan, in line with the Corporate Community Health and Safety Management Plan requirements.</p> <p>As part of the GWP Operations Community Health and Safety Management Plan, it is required to develop a site - specific risk assessment and risk register addressing the already identified high level risky areas. Define the temporary actions to be taken until the rehabilitation works are done not to face with any potential negative impacts on the community.</p>

¹² These are the sites where the existing old network system needs to be rehabilitated before the other sections due to the potential leakage and failure risks.

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
Emergency Response Teams	There are Emergency Response Teams in place in GWP responsible for both water distribution and sewage water lines to response in any leakages in the system. Both infrastructures are monitored remotely and Emergency Response Teams are mobilized to the location where there is a failure is identified in the monitoring system.	SPS section IV	Compliant	No action required.
Involuntary Resettlement				
Management of land acquisition and compensation processes	Corporate Level GGU continues to acquire land rights for their projects and it is recommended that the procedure for completing such processes is standardized and conducted in alignment with IFC and ADB standards.	IFC PS 1 requires that companies establish and maintain an ESMS. The ESMS will incorporate the following elements: (i) policy; (ii) identification of risks and impacts; (iii) management programs; (iv) organizational capacity and competency; (v) emergency preparedness and response; (vi) stakeholder engagement; and (vii) monitoring and review.	Compliant	It is required that, as part of the GGU Corporate Environmental and Social Management System, develop a corporate policy/procedures for screening and categorisation with regard to involuntary resettlement. It is recommended to develop a Land Acquisition and Compensation Procedure consistent with ADB SR2 standards for involuntary physical and economic displacement and to manage negotiated settlement (willing buyer / seller) consistent with ADB SPS SR2.
Management of land acquisition and compensation processes	GWP GWP confirmed that to date the acquisition of municipal land for the establishment of pumping stations has not resulted in involuntary resettlement impacts.	GWP does not have a procedure for land acquisition and compensation which defines clear process for screening and auditing. In this regard the avoidance of involuntary resettlement (land users with no ownership rights) is not formalised but based on company good practice.	Compliant	It is required for GWP to adopt the GGU Safeguards Screening and Categorization Procedure to ensure that activities identified as Category A or B for Involuntary Resettlement do not utilise ADB funds and / or are avoided in non-ADB funded project activities. It is recommended to develop a Land Acquisition and Compensation Procedure involuntary physical and economic

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
				displacement and to manage negotiated settlements (willing buyer/seller) consistent with ADB SR2.
Biodiversity Conservation and Sustainable Natural Resource Management				
Biodiversity Conservation and Protection	Corporate level GGU relies largely on ad hoc external advice for support on biodiversity. GGU lacks internal capacity on biodiversity issues and this is reflected in the absence of a biodiversity strategy and overarching corporate policies and procedures.	SPS section V, para 142-160	N/A	It is recommended that responsibility for coordination of strategy, development of policies and procedures, and assessment of performance on biodiversity should be assigned to a senior manager within GGU.
Biodiversity Conservation and Protection	GWP The network infrastructure of the water supply system overlaps the urban area of Tbilisi, the capital of Georgia, and neighbouring villages. Therefore, GWP subproject components are located in modified and highly modified habitat (constructed land), characterized by low biodiversity value. Project operation activities related to the network do not overlap with any legally protected areas.	SPS section V, para 142-160	Compliant	No action required.
Biodiversity Assessment	Corporate level GGU relies on externals for biodiversity support on a project by project basis but has no overarching coherent guidance on how to manage these tasks.	SPS section V, para 161-175	N/A	GGU is recommended to develop a biodiversity strategy to demonstrate how it will meet biodiversity requirements and develop overarching policies and standards at the corporate level to deliver these requirements. These policies and procedures should include screening for biodiversity risk, management of biodiversity risk, mitigation and monitoring. Policies on no net loss and net gain should be developed, identifying under what circumstances this might be required and the process for achieving it.

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
Biodiversity Assessment	<p>GWP Environmental Impact Assessment (EIA) has not been undertaken for any of the GWP activities, as was not required by the Georgian law.</p> <p>Potential biodiversity risks for rehabilitation works or installation of new water connection are identified through a desktop screening phase that is undertaken by GWP internal environmental experts. If sensitive biodiversity features are likely to occur an external consultant is planned to be contracted. However, the procedure seems rather informal and improvement would be necessary to refine it.</p> <p>Where appropriate, mitigation measure are required by the Municipality (e.g. payment for trees cutting). On a voluntary basis, as part of the GWP Social Programme, campaigns of tree planting are undertaken.</p> <p>No biodiversity monitoring is currently in place for the operational activities as there is no national legal requirement to do so.</p>	SPS section V, para 161-175	Partially Compliant	GWP is recommended to develop a formal Biodiversity Screening Procedure that should be considered in the planning phase of new works of rehabilitation and / or construction. The procedure needs to identify potential risks (including indirect effects such as release downstream of silt during construction), describe roles and responsibilities and provide a mitigation plan. Procedures should be put in place to ensure mitigation plans are implemented.
Physical Cultural Resources				
Chance Find Procedures	<p>GGU Corporate No Chance Finds Procedures were implemented for any of the subprojects of GGU. GGU did not provide a standard Chance Finds Procedure template for future projects.</p>	GGU need to develop a standardised Chance Finds Procedure template to be rolled out across the organisation for future projects.	Recommendation	Develop a detailed Chance Finds Procedure template at GGU Corporate level which can be tailored and adapted for each and every project where necessary. This will enable an appropriate base document, which is compliant, to be easily produced for future projects.

ENVIRONMENTAL AND SOCIAL GAP ANALYSIS REPORT

Corporate Environmental and Social Management System of the
Georgia Global Utilities JSC and Georgian Water & Power Subproject
Audit

E&S GAP ANALYSES FINDINGS

Topic & Aspect	Comment/Observation	Gap & Weakness	Compliant or Non-Compliant with ADB SPS requirements	Corrective Action to close gaps identified in compliance with ADB SPS SRs
Cultural Heritage Management Plan	GGU Corporate GGU need to develop a standardised Cultural Heritage Management Plan template to be rolled out across the organisation for future projects.	SPS section VII	Recommendation	Develop a detailed Cultural Heritage Management Plan template at GGU Corporate level which can be tailored and adapted for each and every project where necessary. This will enable an appropriate base document, which is compliant, to be easily produced for future projects.
Cultural Heritage Management Plan	GWP There is no Cultural Heritage Management Plan in place at GWP.	All future GWP projects should have appropriate Cultural Heritage Management Plan.	N/A	It is recommended to develop a detailed Cultural Heritage Management Plan for GWP.
Chance Find Procedures	GWP There is no Chance Find Procedure in place at GWP.	All future GWP projects should have appropriate Chance Finds Procedure.	Non-Compliant	Develop a detailed Chance Finds Procedure for GWP.

APPENDIX A LIST OF DOCUMENTS REVIEWED

3 July 2020

No.	Document
1	Akhmeta_HPP_ecological examination_09.11.12.pdf
2	Akhmeta_HPP_ecological examination_09.11.12.docx
3	AKHMETA ESIA_2012.doc
4	AKHMETA ESIA_2012.pdf
5	Akhmeta HPP non-technical summary.pdf
6	Akhmeta HPP Technical Summary.pdf
7	Akhmeta HPP_5_year_ESAP_Operation_Stage_2020-2024.pdf
8	Akhmeta_ESIA_2012__EN_Google_Translate.pdf
9	Employment List - Akhmeta.xlsx
10	Generators Manual.pdf
11	Intake Gate AKHMETA-Operating Instructions.pdf
12	Turbine Operations Manual OM-F-12H009-EN-a.pdf
13	მილსადენის ჩამკეტი ფარის მართვა.pdf
14	Akhmeta HPP_natural hazards risk assessment.pdf
15	Akhmeta - Operational Risk Assessment.pdf
16	Akhmeta HS Plan.pdf
17	Akhmeta.kmz
18	Hydrolea social projects.pdf
19	hydrolea_Stakeholder Engagement Plan.pdf
20	Violation of conditions defined by The Ministry for Akhmeta HPP.xlsx
21	Violation of conditions defined by The Ministry for Kasleti 2 HPP.xlsx
22	GWP_Bodorna_HPP_environmental_decision_05.06.18.pdf
23	GWP_Bodorna_HPP_environmental_decision_05.06.18__EN_Google_Translate_all_pages.pdf
24	Bodorna HPP_5_year_ESAP_Operation_Stage_2020-2024 (00000003).pdf
25	Bodorna_HPP_ESIA_2018.pdf
26	Bodorna_HPP_ESIA_2018_ENGLISH.pdf
27	Employment List - Bodorna.xlsx
28	7KM2111-1BA00-3AA0.pdf
29	12FGL150
30	952305
31	A9A15310
32	A9D31616
33	963857152_AC Generator.pdf

No.	Document
34	Maintenance Schedule.pdf
35	0BFA01
36	0LPY01
37	1BAA10
38	1CJA01
39	Water level measurement
40	01 Generator
41	02 Hydraulic unit
42	03 Turbine
43	04 Diesel unit
44	04 Gearbox
45	05 Sump pump
46	06 Transformers
47	963857152_AC Generator.pdf
48	Maintenance Schedule.pdf
49	Bodorna HPP_natural hazards risk assessment.pdf
50	Bodorna HPP HS Risk Assessment.pdf
51	Bodorna HPP OHS and EPRP Plan.pdf
52	Bodorna.kmz
53	Coordinates of power plants.pptx
54	General Information - GGU Group Assets.docx
55	GGU Assets.kmz
56	GGU_Hydro and Wind Power Plants locations.pdf
57	ggu-utility-and-energy-business-presentation-october-2017-77.pdf
58	GSTP_discharge_agreement_30.01.20.pdf
59	GSTP_Permit_19.06.09.pdf
60	GSTP_WMP_agreement_11.12.18.pdf
61	GWP_Technical conditions on water extstruction_GEO.pdf
62	GWP_WMP_agreement_13.02.19.pdf
63	GSTP waste management online report 2019.jpg
65	GGU Environmental and Social Policy Framework.pdf
66	GGU_Environment and Social Policy.pdf
67	GGU HS Policy.pdf
68	Code of Conduct.pdf

No.	Document
69	Diversity Policy.pdf
70	R-1.2017.G - Internal Regulation -ENG.pdf
71	Whistleblowing policy .pdf
72	Organizational structure.PPTX
73	Questionnaire filled by client_ESDD_GGU_09.06.20.docx
74	GGU_External_ESHS Audit_Report_Cushmans_2018.pdf
75	GGU_External_ESHS_Audit_Report_30.05.2017.pdf
76	GWP_External_ESHS_Audit_Report_G-CERTI_2019.pdf
77	GGU Azbest Management Plan.docx
78	GGU Community Health Safety and Security Management Plan (00000002).docx
79	GGU Contractor Management Plan.docx
80	GGU Occupational Health and Safety MP.DOCX
81	GGU Pollution Prevention and Control Plan.docx
82	GGU Reinstatement Management Plan.docx
83	GGU Transport Management Plan.docx
84	GGU-Environmental-and-Social-Action-Plan-GEORGIAN H&S.docx
85	GGU-Water Energy and Resources Management Plan.docx
86	Stakeholder-MP.doc
87	Labor Contract GEO.DOCX
88	Labor Contract GEO.pdf
89	Labor Contract GEO_ENG.pdf
90	598-19 (კვესეთის წყალსადენი) ენსიტი_GWP-224794.pdf
91	NCT კონტრაქტორის განაცხადი Jan 2019.pdf
92	GGU Grievance Policy.pdf
93	Code of Conduct.pdf
94	Diversity Policy.pdf
95	R-1.2017.G - Internal Regulation -ENG.pdf
96	Whistleblowing policy .pdf
97	GWP - 2019 HS Report.pdf
98	GWP Health and Safety Report 2019.xls
99	ავარიულ სიტუაციაში მოქმედების გეგმა - ბოდორნაჰესი.pdf
100	ავარიულ სიტუაციაში მოქმედების გეგმა - ჟინვალჰესი.pdf
101	საგანგებო სიტუაციის მართვის გეგმა.pdf

No.	Document
135	HPU
136	passport.BV1100_PN10_Debeda
137	passport_Debeda_Francis_eng
138	გენერატორის პასპორტი (ინგლისური)_Generator Passport (English)
139	Debeda HPP_natural hazards risk assessment
140	Debeda - Operational Risk Assessment
141	Debeda HS Plan
142	Debeda.kmz
143	Hydrolea social projects.pdf
144	Kasleti2_HPP_ecological examination_08.06.15
145	Kasleti2-HPP_ecological examination_08.06.2015
146	Kasleti ESIA_biodiv_IA_ENG
147	Kasleti ESIA_Content_ENG
148	Kasleti ESIA_Biodiv_ENG
149	K2_007_Pory_NTS_2015
150	Kasleti 2 HPP non-technical summary
151	Kasleti 2 HPP Technical Summary
152	KASLETI ESIA 2015 English
153	KASLETI ESIA_2015
154	KASLETI ESIA_2015
155	Kasleti2 HPP_5_year_ESAP_Operation_Stage_2020-2024
156	Employment List - Kasleti
157	01.Generator Units Startup
158	02.Genertator Units Stop
159	03. Periodic Check
160	04.Cleaning Units
161	05.Intake
162	DOSSIERKASLETI61006144-GENERATOR
163	HPU
164	INLET VALVE
165	TURBINE
166	Kaslet 2HPP_natural hazards risk assessment

No.	Document
167	Kaslet 2HPP_natural hazards risk prevention plan
168	K2 supplementary EPRP Gamma.ka.en
169	K2 supplementary EPRP Gamma
170	KAS_Health and Safety Mnagement Plan
171	Kasleti 2 - Operational Risk Assessment
172	Hydrolea social projects
173	Kasleti.kmz
174	Mestiachala_35ETL_Ecological_Examination_03.08.17
175	Mestiachala_35ETL_Ecological_Examination_03.08.17
176	Mestiachala1_HPP_Ecological_Examination_29.08.16
177	Mestiachala1_HPP_Ecological_Examination_29.08.16a
178	Mestiachala2_HPP_Ecological_Examination_04.08.15
179	Mestiachala2_HPP_Ecological_Examination_04.08.15
180	Mestiachala 1 2_Biodiversity report_Januaryr_June_2019
181	Mestiachala 1 2_Biodiversity report_July_ December_2018
182	Mestiachala 1 2_Biodiversity report_March_June_2019
183	Mestiachala 1 2_Biodiversity report_May-September_ 2018
184	Mestiachala 1 2_Biodiversity report_September_ December_2018
185	Mestiachala 2_Biodiversity report__2019
186	3_Mestiachala 1 HPP_EIA Report
187	4_Mestiachala 1 & 2_ESAP
188	4_Mestiachala 2 HPP_EIA Report
189	EIA - Mestiachala 2 HPP- Eng Final 19.05
190	EIA Report - Mestiachala 1 HPP _ 17.05
191	Mestiachala _5_year_ESAP_Operation_Stage
192	Employment List - Mestia
193	PProjects0558790 Georgia Global Utilities .IL07_Data_InfoMestiachala 1&2 HPPsEmployment
194	HPU
195	OMI _BV DN1400_MES_en
196	Operating and Maintenance Instruction Mestiachala II_Rev_00
197	Info on Climate Vulnerability and risks for Svaneti Region
198	Mestiachala 1 HPP_natural hazards risk assessment.ka.en
199	Mestiachala 1 HPP_natural hazards risk assessment

No.	Document
200	Mestiachala 2HPP_natural hazards risk assessment.ka.en
201	Mestiachala 2HPP_natural hazards risk assessment
202	Mestiachala 2 - Operational Risk Assessment.
203	Mestiachala 2 Health and Safety Plan
204	Land Purchase Mestia_Phaliani
205	Schedule of real property as of 15.04.2020 (1).ka.en
206	Schedule of real property as of 15.04.2020
207	SH-Valeri Gvarliani - Land Plot purchase agreement - 23.10.2019 - counte.
208	GWP Stakeholder list
209	Implementation of SEP on Mestiachala HPPs 2020
210	Mestiachala HPPs_Stakeholder_EP_2017
211	Public Hearing Protocol Mestiachala 1 HPP.ka.en
212	Public Hearing Protocol Mestiachala 1 HPP
213	Public Hearing Protocol Mestiachala 2 HPP.ka.en
214	Public Hearing Protocol Mestiachala 2 HPP
215	Public Hearing Protocol Mestiachala HPPs ETL.ka.en
216	Public Hearing Protocol Mestiachala HPPs ETL
217	Mestiachala 2 HPP 2019 IQ_
218	Mestiachala automatic gauging station
219	Mestiacha Summary
220	Mestiachala 1 and 2.kmz
221	Mestiachalas Flyover
222	Abuladze Report GORI WP Autumn 2016
223	Abuladze REPORT Qartli Wind Farm 2018 Spring
224	QWF Ornithological report Autumn 2017
225	QWF Ornithological report spring 2017
226	Qartli Wind Farm - Environment and Social Assessment report - Final 20Oct15
227	Qartli Wind Farm - Non-Technical Summary -Final 20Oct15
228	Qartli Wind Farm_ESAP Report
229	Qartli Wind Farm_ESAP Report_2019
230	QWF Environment and Social Assessment report - Rev
231	QWF Non-Technical Summary
232	QWF_ESAP_2019

No.	Document
233	Employment List - QWF
234	1 RTU DF1725IED User_s Manual
235	2 RTU DF1725IED Installation and Test
236	3 RTU DF1725IED Maintenance software instructions
237	1 DF8000 UserManual_FrontEndDataAcquisition
238	2 DF8000 UserManual_Report
239	3 DF8000UserManual_Comview
240	4 DF8000UserManual_GraphicalModeling
241	5 DF540 SATALLITE-SYNCHRONIAED CLOCK USER_S MANUAL
242	1 DC monitoring module 1-PMU-S31 User_s Manual
243	2 High frequency inverter IV5000HD-2-400_5KVA User_s Manual
244	4 KOKAMCOM Battery User_s manual
245	3 AC_ DC system operation notes
246	1 DRY-TYPE TRANSFORMER OPERARION INSTRUCTION
247	2 TRANSFORMER TEMPERATURE CONTROL User_s Manual
248	1 8DA Installations and Operation Instructions User_s manual
249	2 7SJ62 USER MANUAL
250	1 FAX MANUAL
251	USER MANUAL LIST
252	Appendix 1. Updated ESAP
253	Appendix 2. Stakeholder Engagement Plan
254	Appendix 3. QWF-ESMP-OH&S-PLN
255	Appendix 4. QWF-ESMP-EPRP-OperPLN
256	Appendix 5. QWF-ESMP-Monitoring-PLN
257	Appendix 6. ESMS_SelfAssessmentForm
258	Appendix 7. Legal and Regulatory Review
259	Appendix 8. QWF ESMS Organogram
260	Appendix 9. QWF ESMP Chance Find Procedure
261	QWF ESMS-ESMP Package (Rev_Nov 2016)
262	QWF Requested land info by ERM
263	2017 Updated Stakeholder environmental plan
264	QWF Stakeholder Engagement Plan 2015
265	QWF.kmz

No.	Document
266	Water Production and Distribution - Eng
267	Akhmeta Public Hearing Protocol.ka.en
268	Akhmeta Public Hearing Protocol
269	Bodorna HPP Public Hearing Protocol.ka.en (2)
270	Bodorna HPP Public Hearing Protocol
271	Debeda HPP Public Hearing Protocol
272	Kasleti 2 Public Hearing Protocol
273	hydrolea_Stakeholder Engagement Plan
274	Hydrolea social projects
275	Implementation of SEP on Mestiachala HPPs 2020
276	GGU Stakeholders EP
277	GWP Grievance
278	Constomer Information Proceedure
279	Constomer Information Proceedure.ka.en
280	Constomer Information Proceedure
281	Semek Order.ka.en
282	Semek Order
283	Attachment 1
284	Attachment 1.ka.en
285	Attachment 1
286	Attachment N2.ka.en
287	Attachment N2
288	Attachment N2
289	Decree 1-15 04.04.2016
290	Decree 1-22 15 .08.16 15.08.2016
291	Proceedure
292	Proceedure.ka.en
293	Proceedure
294	GGU KPIs around the stakeholder engagement and the grievance management
295	COVID 19
296	GGU Transport Management and Road Safety Plan
297	I-11.2015.G Bulldozer Working Personel Instructions
298	I-16.2015.G Excavator Instructions

No.	Document
299	I-26.2015.G Truck Driver Instructions
300	შრომითი ურთიერთობების მართვის წესი
301	GGU_Diversity Policy_ENG
302	თანამშრომლის დაქირავების, ადაპტაციის, შიდა ვაკანსიის დაკომპლექტების და გ.
303	Anti-Sexual Harassment policy
304	Guide to Procurement
305	GGU Contractor Management Plan
306	Evaluation Chavchavadze ave rehabilitation works
307	ბოდორნა ჰესის შესრულება
308	თეთრიხევის შესრულება
309	ჟინვალჰესის შესრულება
310	Akhmeta Build agreement_23.04.2013 - 4339 GEL Geoenergy
311	Akhmeta Ready to build agreement_23.04.2013 - 4114 GEL Geoenergy
312	Debeda land sales agreement_iadigar mamedov
313	Debeda Right to build Agreement_14.05.2015 HG
314	Debeda tarix mamedovi
315	Debeda xazein musaevi
316	kasleti 2 Right to build Agreement_02.10.2017.pdf
317	Kasleti 2_Forestry Lands.pdf
318	MESTIA agnagoba SH 02 17_27.02.2017.pdf
319	MESTIA agnagoba SH 06 16_24.06.2016.pdf
320	GWP_სახელწმიფო ქონების ეროვნული სააგენტო_უძრავი ქონების ნასყიდობა.pdf
321	GWP_უძრავი ქონების ნასყიდობის ხელშეკრულება.pdf
322	GWP_ქონების მართვის სააგენტო_უძრავი ქონების ნასყიდობა.pdf
323	06.GGU Environmental and Social Policy Framework
324	Eng__Land Purchase_Gvarliani
325	Eng__Land Purchase_Phalianii
326	Mestia Sample of Private Owner Agreement
327	
328	Land acquisitions 2015-2020.xlsx
329	KPIs for stakeholder engagement - hydrolea
330	Attendance List.xlsx
331	GGU SEP Presentation.ppt

No.	Document
332	GGU Training.jpg
333	QWF_ESM Report - 2017
334	Public Hearing Protocol Mestiachala 1 HPP.pdf
335	Public Hearing Protocol Mestiachala 2 HPP.pdf
336	Public Hearing Protocol Mestiachala HPPs ETL.pdf
337	მესტიაქალა-შეხვედრები დაინტერესებულ მხარეებთან.docx
338	1.png
339	2.png
340	3.png
341	4.png
342	5.png
343	6.png
344	7.png
345	Axaldaba - contact informations.pdf
346	1.png
347	2.png
348	3.png
349	4.png
350	5.png
351	6.png
352	IMG_0478.JPG
353	IMG_0479.JPG
354	IMG_0480.JPG
355	IMG_0481.JPG
356	IMG_0482.JPG
357	IMG_0483.JPG
358	IMG_0484.JPG
359	IMG_0485.JPG
360	Tedotsminda - EIA public hearing, attenders.pdf
361	QWF Stakeholder meeting.pdf
362	Bodorna HPP Public Hearing Protocol.pdf
363	998 Employment List - Kasleti.xlsx
364	2020-06-15 171253.pdf

No.	Document
365	SH-Company Vabe LLC - M2 Intake 2.1 and 2.2 Works Contract - 01.02.2020 - counter-signed.pdf
366	SH-Company Vabe LLC - RBP Works Contract - 19.03.2020 - counter-signed.pdf
367	598-19 (კვესეთის წყალსადენი) ენსიტი_GWP-224794.pdf
368	NCT კონტრაქტორის განაცხადი Jan 2019.pdf
369	Costomer Information Proceedure.docx
370	Semek Order.pdf
371	CH Agency Permission-Mestiachala river 2015.pdf
372	CH Agency Permission-QWF.pdf
373	Mestiachala HPPs Cultural heritage report.pdf
374	QWF Cultural heritage report_2014.pdf
375	svaneti-mestiachala-daskvna, 2015, 07, 09.xps
376	Appendix C - Calculation Reports.pdf
377	K11-01-0004-02 - HPP1 - Intake 1 - fish pass - calculation.pdf
378	K11-01-0013-01 - HPP1 - Intake 1 - fish pass - overview.pdf
379	K11-01-0014-01 - HPP1 - Intake 1 - fish pass - longitudinal section.pdf
380	K11-11-0002-01 - HPP2 - intake 2.1 - fish pass calculation.pdf
381	K11-11-0003-01 - HPP2 - Intake 2.1 - fish pass - overview.pdf
382	K11-11-0009-00 - HPP2 - Intake 2.1 - fish pass 2.1 - longitudinal section.pdf
383	K11-12-0001-01 - HPP2 - intake 2.2 - fish pass calculation.pdf
384	K11-12-0002-02 - HPP2 - Intake 2.2 - fish pass 2.2 - overview.pdf
385	K11-12-0003-00 - HPP2 - Intake 2.2 - fish pass 2.2 - longitudinal section.pdf
386	GWP_GSTP_Asbestos_utilization_03.18.pdf
387	GWP_RWC_Chlorine Cylinders and Asbestos Utilization Report_09.18.pdf
388	GGU ES Imacts_eng_2020.xlsx
389	Sediment Management Plan for Kasleti 2.pdf
390	Sediment Management Plan for Mestiachala 1.pdf
391	Sediment Management Plan for Mestiachala 2.pdf
392	Violation of conditions defined by The Ministry for Akhmeta HPP_Eng.xlsx
393	Violation of conditions defined by The Ministry for Kasleti 2 HPP_Eng.xlsx
394	Mestiachala-1_Hydrology_Water Economy_V32_160420.pdf
395	Mestiachala-2_Hydrology_Water Economy_V64_160518.pdf
396	01---9.2015.G Gas Welding Instructions.pdf
397	02---8 2015 G - Site Access to Contractor Instructions.pdf
398	03---7 2015 G - Fire Safety measures in Fire Fighting Instru.pdf

No.	Document
399	04---5 2015 G - Fire Safety measures in Storage Units.pdf
400	05---4 2015 G - Instructions Pertaining to Works with elevat.pdf
401	06---36 2016G New Hydraulic Power Units 2015.pdf
402	07---35.2016.G Electrical Machinery Maintenance Electromonit.pdf
403	08---34.2015.G Water Metal Working instructions.pdf
404	09---32.2015.G Water Cleaning Station Instructions.pdf
405	10---31.2015.G Chemical-bacterial Lab Personel Instructions.pdf
406	11---30.2015.G Trasportation of Materials Loading and Unload.pdf
407	12---3 2015 G - Fire Safety Measures in Garages.pdf
408	13---29.2015.G Settling Basin Instructions.pdf
409	14---28.2015.G Pumping Station Instructions.pdf
410	15---27.2015.G Pumping Station Personel Safety Instructions.pdf
411	16---26.2015.G Dump and Loader Truck Driver Instructions.pdf
412	17---25.2015.G Oxygen tank Instructions.pdf
413	18---24.2015.G Coagulant Works Instructions.pdf
414	19---22.2015.G Cleaning structures Instructions.pdf
415	20---21.2015.G Hand Crane instructions and Personel safety.pdf
416	21---20.2015.G Technological Well, Pipeline Instructions.pdf
417	22---19.2015.G Earthworks Instructions.pdf
418	23---17.2015.G Sewage Well Working Personel Instructions.pdf
419	24---16.2015.G Excavator Instructions.pdf
420	25---15.2015.G When performing Electrolytic Welding.pdf
421	26---14.2015.G Electrolytic Welding.pdf
422	27---13.2015.G Lifting Crane.pdf
423	28---12.2015.G Helping Worker.pdf
424	29---11.2015.G Bulldozer Operator.pdf
425	30---10.2015.G Crane Instructions.pdf
426	31--- 37.2016.G New Electic Instalation decree 2015.pdf
427	32---GWP HSE Portable tools.pdf
428	33---GWP HSE PPE new.pdf
429	34---GWP HSE 08 hand tools new 2019.pdf
430	35---23.2015.G Water Reservoir Works Instructions.pdf
431	36---Accident recoding procedure.pdf

No.	Document
432	37---7.2019.G - Operation Personel Fire Safety.pdf
433	38---18.2015.G Metal Works instructions.pdf
434	39---33.2015.G Water Networks ad Well Personel Instructions.pdf
435	40---12 2015 G - Chlorine Storage and Transport and Use Inst.pdf
436	ESMS DOCUMENT CONTROL AND RECORD KEEPING PROCEDURE.pdf
437	ESMS MONITORING AND REPORTING PROCEDURE.pdf
438	ESMS NON-CONFORMANCE CAR-PAR PROCEDURE.pdf
439	ESMS PLANNING PROCEDURE.pdf
440	ESMS STAKEHOLDERS ENGAGEMENT PROCEDURE AND GRIEVANCE MECHANISM.pdf
441	ESMS TRAINING, AWARENESS AND COMPETENCE PROCEDURE.pdf
442	GWP-GKGR-0004-EC 2015 .pdf
443	ISO 9001-2015 Certificate.pdf
444	Internal Audit_Zhinvali_Aagvi Valley_report_2017.pdf
445	GGU Internal Environmental audit report 2019 Q1-4.pdf
446	GGU Internal Environmental audit report 2019 Q3-4.pdf
447	GWP - 6 Month HS Report.pdf
448	GWP_Mukhrani_groundwater_license_03.09.12.pdf
449	GWP_Natakhtari_groundwater_license_03.09.12.pdf
450	GWP_Saguramo_HPP_Ecological_Examination_23.09.15.pdf
451	GWP_Tetrikhevi_HPP_Ecological_examination_25.09.14.pdf
452	GWP_Zhinvali_HPP_Permit_25.09.14.pdf
453	RWC_Khrami_groundwater_license_2016.pdf
454	RWC_Khrami_groundwater_license_2018.pdf
455	Reduction potential of GHG emission for GGU projects.pdf
456	GWP_Noise_Measurement_Report_2019.pdf
457	GSTP_Report_GNERC_4Q_2019.pdf
458	GSTP_water use state accounting_2017 (1).pdf
459	GSTP_water use state accounting_2017 (2).pdf
460	GSTP_water use state accounting_2018 (1).pdf
461	GSTP_water use_state accounting_2017 (1).pdf
462	GSTP_water use_state accounting_2017 (2).pdf
463	GSTP_water use_state accounting_2019.pdf
464	GWP waste management online report 2019.jpg

No.	Document
465	GWP_Report_GNERC_1Q_2018.pdf
466	GWP_Report_GNERC_1Q_2019.pdf
467	GWP_Report_GNERC_2Q_2018.pdf
468	GWP_Report_GNERC_2Q_2019.pdf
469	GWP_Report_GNERC_3Q_2018.pdf
470	GWP_Report_GNERC_3Q_2019.pdf
471	GWP_Report_GNERC_4Q_2018.pdf
472	GWP_Report_GNERC_4Q_2019.pdf
473	MWC_Report_GNERC_1Q_2018.pdf
474	MWC_Report_GNERC_1Q_2019.pdf
475	MWC_Report_GNERC_2Q_2018.pdf
476	MWC_Report_GNERC_2Q_2019.pdf
477	MWC_Report_GNERC_3Q_2018.pdf
478	MWC_Report_GNERC_3Q_2019.pdf
479	MWC_Report_GNERC_4Q_2018.pdf
480	MWC_Report_GNERC_4Q_2019.pdf
481	Akhmeta_ESDD Report_2013.pdf
482	Bodorna_HPP_ESIA_2018.pdf
483	ESIA - Mestiachala 2 HPP- Eng Final 19.05.pdf
484	ESIA Report - Mestiachala 1 HPP _ 17.05.pdf
485	Kasleti 2 E&S monitoring report 2018.pdf
486	7KM2111-1BA00-3AA0.pdf
487	12FGL150.pdf
488	952305.pdf
489	A9A15310.pdf
490	A9D31616.pdf
491	A9F04325.pdf
492	A9F73306.pdf
493	A9F74116.pdf
494	A9F74303.pdf
495	A9F74340.pdf
496	A9F74350.pdf
497	A9F77106.pdf

No.	Document
498	A9N61526.pdf
499	A9N61528.pdf
500	A9N61531.pdf
501	A9N61538.pdf
502	AR0101.pdf
503	BQ0207.pdf
504	LC1D09BD.pdf
505	LC1D12BD.pdf
506	LC1D50ABD.pdf
507	LV430310.pdf
508	METSECT5MA015.pdf
509	NSYCR100WU2C.pdf
510	NSYLAM8T5.pdf
511	PLASTIM PTHT, PHG02.pdf
512	QUINT-DIODE-12-24DC-2X20-1X40.pdf
513	QUINT-PS-3AC-24DC-20.pdf
514	RM17TU00.pdf
515	SIRIUS 3UG46 33.pdf
516	TeSys GV2_GV2P04.pdf
517	TeSys GV2_GV2P08.pdf
518	TeSys GV2_GV2P14.pdf
519	TeSys GV2_GV2P16.pdf
520	XCKN2110G11.pdf
521	0vp 32-33.pdf
522	6ES7131-6BH00-0BA0.pdf
523	6ES7132-6BH00-0BA0.pdf
524	6ES7134-6GD00-0BA1.pdf
525	6ES7155-6AR00-0AN0.pdf
526	6ES7193-6BP00-0BA0.pdf
527	6ES7193-6BP00-0DA0.pdf
528	6GK5004-1BD00-1AB2.pdf
529	952305.pdf
530	A9A15310.pdf

No.	Document
531	A9D31616.pdf
532	A9F04303.pdf
533	A9F04306.pdf
534	A9F04310.pdf
535	A9F04325.pdf
536	A9F74110.pdf
537	A9F77106.pdf
538	A9N61523.pdf
539	A9N61526.pdf
540	NSYCR100WU2C.pdf
541	NSYLAM8T5.pdf
542	PLASTIM PTHT, PHG02.pdf
543	PLC-RSC- 24DC-21.pdf
544	QUINT4-PS-1AC-24DC-5.pdf
545	RGZE1S35M.pdf
546	RM17TU00.pdf
547	RXG12BD.pdf
548	RXM3AB2BD.pdf
549	RXZE2S111M.pdf
550	XCKN2110G11.pdf
551	A9F74102.pdf
552	6ES7131-6BH00-0BA0.pdf
553	6ES7132-6BH00-0BA0.pdf
554	6ES7134-6GD00-0BA1.pdf
555	6ES7134-6JD00-0CA1.pdf
556	6ES7135-6HD00-0BA1.pdf
557	6ES7138-6AA00-0BA0.pdf
558	6ES7193-6AR00-0AA0.pdf
559	6ES7193-6BP00-0BA0.pdf
560	6ES7193-6BP00-0DA0.pdf
561	6ES7512-1DK01-0AB0.pdf
562	6ES7954-8LC02-0AA0.pdf
563	6GK5004-1BD00-1AB2.pdf

No.	Document
564	6GK5008-0BA00-1AB2.pdf
565	7KM2111-1BA00-3AA0.pdf
566	7KM9300-0AE01-0AA0.pdf
567	7SJ80 - EMDG-C10068-00-7600_SIPROTEC_Compact_Catalog_Ed_4_EN.pdf
568	7UM62_Catalog_SIP_E7.pdf
569	7UM62xx_Manual_A7_V046300_en (1).pdf
570	7UM621.pdf
571	700-ha.pdf
572	2864422.pdf
573	2950103.pdf
574	A9A15310.pdf
575	eMT3120A.pdf
576	et200sp_system_manual_en-US_en-US.pdf
577	GN rotary cam switches.pdf
578	IM21-14-CDTRi.pdf
579	LA1 KN20.pdf
580	LA4 KC1B.pdf
581	LC1 D09.pdf
582	LP1 K09004BD.pdf
583	NSYCR100WU2C.pdf
584	NSYLAM8T5.pdf
585	OVP 32 33.pdf
586	PLASTIM PTHT, PHG02.pdf
587	PLC-RSC-24DC 21.pdf
588	RGZE1S35M.pdf
589	RM17TU00.pdf
590	RXG12BD.pdf
591	RXM 3AB2BD.pdf
592	RXZE2S111M.pdf
593	RZM040W.pdf
594	SPM-D2-1010B.pdf
595	SQ0214-C-L-4-0-0-0.pdf
596	XB4 BD53.pdf

No.	Document
597	XB4 BVB1.pdf
598	XB4 BVB4.pdf
599	XB4 BVB5.pdf
600	XCKN2110G11.pdf
601	ZB4 BA1.pdf
602	ZB4 BW643.pdf
603	ZB4 BZ009.pdf
604	ZB4 BZ105.pdf
605	ZB4BW333.pdf
606	ZB4BZ103.pdf
607	ZBE 203.pdf
608	ZBE 204.pdf
609	ZBV B4.pdf
610	ZBVB3.pdf
611	ZBY 8330.pdf
612	ZBZ 1605.pdf
613	npk4s13x0602b.pdf
614	npk4110a0600h_04.pdf
615	M71AD542C_.stp
616	701027 - MJHT 710 MB8 - dynamic calc report.pdf
617	704269UK.pdf
618	Damage Curve for Stator Earth Fault Current.pdf
619	DS_701027_05_A.pdf
620	M00AGC33B_.pdf
621	M00AZ848A_D.pdf
622	M00AZE37A_A.pdf
623	M00AZE56A_.pdf
624	M71AD542C_B.dwg
625	M71AD542C_B.pdf
626	ZEW34134C_A.dwg
627	ZEW34134C_A.pdf
628	209606-VTP-Referenzklemmenplan.pdf
629	20426152_HPP BODORNA.pdf

No.	Document
630	List of Sensors.xlsx
631	STFT-SP-20114729-HPP Bodorna_hpr_20171227.pdf
632	wegmesssensor_mts_ep-el_en.pdf
633	pt100_jumo_902050_en.pdf
634	BGL50A_001_S49_en.pdf
635	wegseilsensor_asm_ws10_en.pdf
636	413_Bodorna_Correlation_curve.pdf
637	1x110Kva Single Line.pdf
638	Installation and Recommendations Manual.pdf
639	Operation Manual.pdf
640	Revised ATS.PDF
641	AE.70.1,5.P.-.pdf
642	Meister 1_60.pdf
643	NS1-G1-2-AM-C7-280-4K8.pdf
644	PS41-10.pdf
645	TM4411-00_EN-GB.pdf
646	378419_B-1.pdf
647	378419_hydraulic scheme - TGU515.pdf
648	TGU515_Sensoren & Aktuatoren.pdf
649	TGU515_technical data sheet_a.pdf
650	Grundfosliterature-2127821-1.pdf
651	pumps data sheet.pdf
652	taurus float switch.pdf
653	userguide-taurus.pdf
654	1LTR18036A0.dwg
655	1LTR18036A0.pdf
656	1LTR18036AFSR.DWG
657	1LTR18036AFSR.PDF
658	1LTRTCDBAWD-13.dwg
659	1LTRTCDBAWD-13.pdf
660	100_23587.dwg
661	100_23587.pdf
662	180307 ABB DTR 100 datasheet.docx

No.	Document
663	180307 ABB DTR 100 datasheet.pdf
664	LV bu 1_250_I-8514-03.pdf
665	963857152_AC Generator.pdf
666	Maintenance Schedule.pdf
667	607983_Generator manual_M II.pdf
668	Akhmeta HS Plan.pdf
669	Bodorna Emergency Response Plan.pdf
670	Debeda HS Plan.pdf
671	Emergency Response Plan on COVID 19.pdf
672	GGU Asbestos Management Plan.pdf
673	GGU Pollution Prevention and Control Plan.pdf
674	GGU Water, Energy and Resources Management Plan.pdf
675	GWP Safety Instruction.pdf
676	Kasleti 2 HS Plan.pdf
677	Zhinvali HPP Emergency Response Plan.pdf
678	Reduction potential of GHG emission for GGU projects.pdf
679	Akhmeta HS Plan.pdf
680	Bodorna Emergency Response Plan.pdf
681	Debeda HS Plan.pdf
682	Emergency Response Plan on COVID 19.pdf
683	GWP - 6 Month HS Report.pdf
684	GWP Safety Instruction.pdf
685	Kasleti 2 HS Plan.pdf
686	Zhinvali HPP Emergency Response Plan.pdf
687	GWP_Noise_Measurement_Report_2019.pdf
688	Mestiachala Noise Measurement Report.pdf
689	Mestiachala HPPs Stakeholder List.pdf
690	01---9.2015.G Gas Welding Instructions.pdf
691	02---8 2015 G - Site Access to Contractor Instructions.pdf
692	03---7 2015 G - Fire Safety measures in Fire Fighting Instru.pdf
693	04---5 2015 G - Fire Safety measures in Storage Units.pdf
694	05---4 2015 G - Instructions Pertaining to Works with elevat.pdf
695	06---36 2016G New Hydraulic Power Units 2015.pdf

No.	Document
696	07---35.2016.G Electrical Machinery Maintenance Electromonit.pdf
697	08---34.2015.G Water Metal Working instructions.pdf
698	09---32.2015.G Water Cleaning Station Instructions.pdf
699	10---31.2015.G Chemical-bacterial Lab Personel Instructions.pdf
700	11---30.2015.G Trasportation of Materials Loading and Unload.pdf
701	12---3 2015 G - Fire Safety Measures in Garages.pdf
702	13---29.2015.G Settling Basin Instructions.pdf
703	14---28.2015.G Pumping Station Instructions.pdf
704	15---27.2015.G Pumping Station Personel Safety Instructions.pdf
705	16---26.2015.G Dump and Loader Truck Driver Instructions.pdf
706	17---25.2015.G Oxygen tank Instructions.pdf
707	18---24.2015.G Coagulant Works Instructions.pdf
708	19---22.2015.G Cleaning structures Instructions.pdf
709	20---21.2015.G Hand Crane instructions and Personel safety.pdf
710	21---20.2015.G Technological Well, Pipeline Instructions.pdf
711	22---19.2015.G Earthworks Instructions.pdf
712	23---17.2015.G Sewage Well Working Personel Instructions.pdf
713	24---16.2015.G Excavator Instructions.pdf
714	25---15.2015.G When performing Electrolytic Welding.pdf
715	26---14.2015.G Electrolytic Welding.pdf
716	27---13.2015.G Lifting Crane.pdf
717	28---12.2015.G Helping Worker.pdf
718	29---11.2015.G Bulldozer Operator.pdf
719	30---10.2015.G Crane Instructions.pdf
720	31--- 37.2016.G New Electic Instalation decree 2015.pdf
721	32---GWP HSE Portable tools.pdf
722	33---GWP HSE PPE new.pdf
723	34---GWP HSE 08 hand tools new 2019.pdf
724	35---23.2015.G Water Reservoir Works Instructions.pdf
725	36---Accident recoding procedure.pdf
726	37---7.2019.G - Operation Personel Fire Safety.pdf
727	38---18.2015.G Metal Works instructions.pdf
728	GGU HS Performance Monitoring.pdf

No.	Document
729	GGU Health and Safety Report 2019.pdf
730	03---7 2015 G - Fire Safety measures in Fire Fighting Instru.pdf
731	12---3 2015 G - Fire Safety Measures in Garages.pdf
732	37---7.2019.G - Operation Personel Fire Safety.pdf
733	Akhmeta HS Plan.pdf
734	Bodorna Emergency Response Plan.pdf
735	Debeda HS Plan.pdf
736	Emergency Response Plan on COVID 19.pdf
737	GWP - 6 Month HS Report.pdf
738	GWP Safety Instruction.pdf
739	Kasleti 2 HS Plan.pdf
740	Zhinvali HPP Emergency Response Plan.pdf
741	IN19-0195384_ Annex 1. Application.pdf
742	IN19-0195384_ Annex 2. Reaction_Exam_protocol.pdf
743	IN19-0195384_ Annex 3_Response Letter.pdf
744	IN19-0195384_Document_recruite_screen.jpg
745	IN19-0244792_ Annex 1. Application
746	IN19-0244792_ Annex 2. Reaction_Exam_Protocol.pdf
747	IN19-0244792_ Annex 3. Response_letter.pdf
748	IN19-0244792_Document_recruite_screen.jpg
749	IN20-0363160_ Annex 1_Application.
750	IN20-0363160_ Annex 2_Reaction_Intra_Service.pdf
751	IN20-0363160_ Annex 3_Response letter.pdf
752	IN20-0363160_Document_circution_screen.JPG
753	IN20-0368316_ Annex 1. Application.pdf
754	IN20-0368316_ Annex 2. Response_Protocol_.pdf
755	IN20-0368316_Document_recruite_screen.jpg
756	Electronic database summary complaint.docx
757	Electronic database summary complaint - 1.docx
758	GWP_Electronic Database Summary - 2.7z
759	ESMS-ის კომუნიკაციას სტეიკჰოლდერებთან.docx
760	Bodorna HPP Public Hearing Protocol.docx
761	Bodorna HPP Public Hearing Protocol.pdf

No.	Document
762	Public Hearing Protocol Mestiachala 1 HPP.pdf
763	Public Hearing Protocol Mestiachala 2 HPP.pdf
764	Public Hearing Protocol Mestiachala HPPs ETL.pdf
765	მესტიაქალა-შეხვედრები დაინტერესებულ მხარეებთან.docx
766	1.png
767	2.png
768	3.png
769	4.png
770	5.png
771	6.png
772	7.png
773	Axaldaba - contact informations.pdf
774	1.png
775	2.png
776	3.png
777	4.png
778	5.png
779	6.png
780	IMG_0478.JPG
781	IMG_0479.JPG
782	IMG_0480.JPG
783	IMG_0481.JPG
784	IMG_0482.JPG
785	IMG_0483.JPG
786	IMG_0484.JPG
787	IMG_0485.JPG
788	Tedotsminda - EIA public hearing, attenders.pdf
789	QWF Stakeholder meeting.pdf
790	Public Hearing Protocol Mestiachala 1 HPP.pdf
791	Public Hearing Protocol Mestiachala 2 HPP.pdf
792	Public Hearing Protocol Mestiachala HPPs ETL.pdf
793	მესტიაქალა-შეხვედრები დაინტერესებულ მხარეებთან.docx
794	მესტიაქალა-შეხვედრები დაინტერესებულ მხარეებთან.ka.en.pdf

No.	Document
795	1.png
796	2.png
797	3.png
798	4.png
799	5.png
800	6.png
801	7.png
802	Axaldaba - contact informations.pdf
803	1.png
804	2.png
805	3.png
806	4.png
807	5.png
808	6.png
809	IMG_0478.JPG
810	IMG_0479.JPG
811	IMG_0480.JPG
812	IMG_0481.JPG
813	IMG_0482.JPG
814	IMG_0483.JPG
815	IMG_0484.JPG
816	IMG_0485.JPG
817	Tedotsminda - EIA public hearing, attenders.pdf
818	QWF Stakeholder meeting.pdf
819	2020-06-15 171253.pdf
820	SH-Company Vabe LLC - M2 Intake 2.1 and 2.2 Works Contract - 01.02.2020 - counter-signed.pdf
821	SH-Company Vabe LLC - RBP Works Contract - 19.03.2020 - counter-signed.pdf
822	598-19 (კვესეთის წყალსადენი) ენსიტი_GWP-224794.pdf
823	NCT კონტრაქტორის განაცხადი Jan 2019.pdf
824	GGU SEP Presentation.ppt
825	GGU Training.jpg
826	Attendance List.xlsx
827	GGU SEP Presentation.ka.en.pdf

No.	Document
828	GGU SEP Presentation.ppt
829	GGU Training.jpg
830	KPIs for stakeholder engagement - hydrolea.docx
831	Land acquisitions 2015-2020.xlsx
832	QWF_ESM Report - 2017.pdf
833	Covenant of the contractor _ short form.doc
834	COVID 19 Risk Assessment.doc
835	Environmental and Social Issues Division.pdf
836	GGU Contractor Management Plan (00000002).docx
837	GWP Organizational Structure _ ENG.PDF
838	Health and Safety Division.pdf
839	New connections detailed process.docx
841	New connections detailed process.pdf
842	Third party damages _ procedure.7z
843	ბრძანება 10.10.2019_eng.pdf
844	ზიანის შესწავლისა და დარეგულირების პროცედურა_eng.pdf
845	კონტრაქტორების მართვის გეგმა.doc
846	რისკების შეფასება - სამშენებლო დეპარტამენტი.doc
847	რისკების შეფასება - საქლორატორო სადგურში კონტეინერების მიღება-დამონტაჟებ..doc
848	რისკების შეფასება - წყალარინების საავარიო სამსახური.doc
849	რისკების შეფასება - წყალსადენის საავარიო სამსახური.doc
850	Contract_amendment_Ecomedi_gst_06.01.20.pdf
851	Contract_amendment_Ecomedi_gwp_06.01.20.pdf
852	Contract_amendment_Ecomedi_gwp03.12.18.pdf
853	Contract_amendment_Ecomedi_gwp15.02.19.pdf
854	Contract_amendment_Sanitari_gst_18.04.19.pdf
855	GSTP_Contract_Ecomedi_16.02.18.pdf
856	Covenant of the contractor _ short form.doc
857	COVID 19 Risk Assessment.doc
858	Environmental and Social Issues Division.pdf
859	GGU Contractor Management Plan (00000002).docx
860	GGU ESMS Procedures.pdf
861	GWP E&S Performance chart and quarterly timeline.docx

No.	Document
862	GWP Organizational Structure _ ENG.PDF
863	gwp_Waste_Management_Plan_2019 _2022.pdf
864	GWP-Letter to the Ministry of Environment 2.pdf
865	GWP-Letter to the Ministry of Environment.pdf
866	Health and Safety Division.pdf
867	I-8 2015 G - ობიექტებზე კონტრაქტორების დაშვების ინსტრუქცია.doc
868	New connections detailed process.docx
869	R-25.2019.G - წყალსადენის საავარიო სამუშაოების წარმოების რეგლამენტი.pdf
871	კონტრაქტორების მართვის გეგმა.doc
872	რისკების შეფასება - სამშენებლო დეპარტამენტი.doc
873	რისკების შეფასება - საკლორატორო სადგურში კონტეინერების მიღება-დამონტაჟებ..doc
874	რისკების შეფასება - წყალარინების საავარიო სამსახური.doc
875	რისკების შეფასება - წყალსადენის საავარიო სამსახური.doc
876	რისკების შეფასების პროცედურა.pdf
877	ბრძანება 10.10.2019.docx
878	ზიანის შესწავლისა და დარეგულირების პროცედურა.docx
880	2019_წ - მომხმარებელთან ურთიერთობის სამსახურის რეპორტი.pdf
881	2019_წ - მომხმარებელთან ურთიერთობის სამსახურის რეპორტი.pptx
883	determining categorization.pdf
884	GWP-Water Balance.xlsx
885	GWP-ის პრიორიტეტიზაციის ფორმა სემეკის მოთხოვნის მიხედვით.ka.en.pdf
886	GWP-ის პრიორიტეტიზაციის ფორმა სემეკის მოთხოვნის მიხედვით.xlsx
888	Revision of Biodiversity of the corridor of the water supply network for Golf Club.pdf
890	Svaneti Induction Presentation_January 2020.pdf
891	ანგარიში თბილისს (00000004).docx
893	მომსახურების ხარისხისა და მოხმარების წესების დადგენილებები.docx
895	მომსახურების ხარისხისა და მოხმარების წესების დადგენილებები.pdf
896	საჩივრების მონაცემთა ბაზა.docx
898	საჩივრების მონაცემთა ბაზა.pdf
899	საჩივრის პროცედურა ERP სისტემაში.docx
901	საჩივრის პროცედურა ERP სისტემაში.pdf
903	სემეკის პრიორიტეტიზაციის მოთხოვნის ფორმა.xlsx
904	annex N1 - Daba Mestiis Ruka.pdf

No.	Document
905	annex N2 - Khaishis mimdebared kulturuli memkvidreoba.pdf
907	annex N3 - ბიომრავალფეროვნების მონიტორინგის ანგარიში მესტიაქალა 2_rev1_geo.pdf
908	annex N4 - ბიომრავალფეროვნების მონიტორინგის ანგარიში მესტიაქალა მაისი-სექტემბერი_re..pdf
911	annex N5 - ბიომრავალფეროვნება მესტიაქალა 1 _ 2019.pdf
913	annex N6 - ბიომრავალფეროვნება მესტიაქალა 1 _ 07-12_2019.pdf
914	annex N7 - K2_010_AQUATIC BIODIVERSITY_short plan_2015.pdf
915	annex N8 - K2_011_AQUATIC BIODIVERCITY_final report_2015.pdf
916	annex N9 - K11-01-0004-02 - HPP1 - Intake 1 - fish pass - calculation.pdf
917	annex N10 - K11-01-0013-01 - HPP1 - Intake 1 - fish pass - overview.pdf
918	annex N11 - K11-01-0014-01 - HPP1 - Intake 1 - fish pass - longitudinal section.pdf
919	annex N12 - K11-11-0002-01 - HPP2 - intake 2.1 - fish pass calculation.pdf
920	annex N13 - K11-11-0003-01 - HPP2 - Intake 2.1 - fish pass - overview.pdf
921	annex N14 - K11-11-0009-00 - HPP2 - Intake 2.1 - fish pass 2.1 - longitudinal section.pdf
922	annex N15 - K11-12-0001-01 - HPP2 - intake 2.2 - fish pass calculation.pdf
923	annex N16 - K11-12-0002-02 - HPP2 - Intake 2.2 - fish pass 2.2 - overview.pdf
924	annex N17 - K11-12-0003-00 - HPP2 - Intake 2.2 - fish pass 2.2 - longitudinal section.pdf
925	annex N18 - Appendix C - Calculation Reports.pdf
926	annex N19 - 20150210 Mestiachala 2 Eco flow alternative.pdf
928	annex N20 - II_99_2010_Anlage_G.pdf
930	annex N21 - მყინვარები აგვისტო 2018 წელი.pdf
932	annex N22 - მყინვარები ივნისი 2019 წელი.pdf
934	annex N23 - მყინვარი ივლისი 2019 წელი.pdf
936	annex N24 - მყინვარების მონიტორინგი სექტემბერი 2019 წელი.pdf

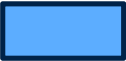
APPENDIX B EXTERNAL FACTORS REVIEW

3 July 2020

Positive



Neutral



Negative



BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
GGU	Business performance Training Environment	bgeo.com/	http://bgeo.com/uploads/presentations/bgeo-investor-day-2016-ggu-utility-and-energy-business-39.pdf	<p>– Management team of utility business – “F” to major subsidiary Power in 2015 (current “BB-” and the court placement by utility through Georgian V EBITDA growth in (2015A Debt/EBIT shareholder: 100% Special program has of newly created business and providing instructions. The program includes academic hours, a 47mln m3 (implying business centres).</p>
	Business Natural monopoly in the water business, with upside in electricity generation Water tariff and regulation. Strong and stable cash flow generation	Bankofgeorgiagroup.com	http://bankofgeorgiagroup.com/reports/annual/12/download	<p>GGU has two main electric power generation. GGU has a natural provides a wastewater (more than one-third Georgian cities: Tbilisi electric power business hydropower generation facility under management capacity. Generate water business, with parties. GGU is developing as well as solar and 2017, GGU commenced in North-Western Georgia HPP to be operational 44.3MW Zoti HPP currently under development</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				<p>the construction by the end of 2020. c.100MW wind projects are currently at the feasibility stage and once complete, GGU expects to commence construction works.</p> <p>In December 2017, GNERC (Georgian National Energy and Water Supply Regulatory Commission), the independent body that regulates GGU's water and wastewater tariffs, has approved new tariffs for GGU for a three-year regulatory period, effective from 1 January 2018. This is the first time the tariff has been set based on the new water and wastewater services tariff methodology adopted by GNERC in August 2017, which is based on international best practice and represents a hybrid method of "cost plus" and "incentive based" methodologies</p> <p>Strong and stable cash flow generation has enabled GGU to distribute dividends of GEL 28.0 million (US\$ 11.0 million) from its water utility business to the Investment Business during Q4, 2017.</p>
	Profit orientated, less social and environmental ones		http://greenalt.org/new/wp-content/uploads/2013/03/Mystery-surrounds-future-of-Georgian-Water-and-Power.pdf	<p>General GWP has business approach and they see water and waste water sector as a business and profit opportunity rather than social infrastructure that can be based operated under the public sector and serve social interests rather than interest of profit maximization</p> <p>GWP does not that intensive practice of getting funds from EBRD, ADB and other international funding institutions</p>
	New water management strategy	www.oecd.com	https://www.oecd-ilibrary.org/environment/facilitating-the-reform-of-economic-instruments-for-water-management-in-georgia_9789264281776-en	<p>New regulation regarding water management</p> <p>Starting the processs to align to EU directive</p> <p>Perhaps a better communication, more transparency</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
GWP	Life quality	nispa.org	https://www.nispa.org/files//GE-report.pdf	Currently, Tbilisi is provided with an up-to-date high-quality water supply service ensuring delivery of good quality drinking water without significant interruptions 24 hours a day to 400, 000 customers, of which about 2000 are public and state organizations, about 15,000 - commercial enterprises and the rest are in the residential sector
	Labour condition	Impact Assessment of Divestiture in Water Utilities; Impact on Labour: Case study, Georgian Water and Power, Tbilisi, Georgia Zaza Dashniani MSc Thesis WM-WSM	https://www.researchgate.net/publication/261676091_Impact_assessment_of_divestiture_in_water_utilities_Impact_on_labour_a_case_study_GWP_Tbilisi_Georgia/link/0c960534f9860dd76300000/download	<p>“In order to understand the effects of divestiture on labour conditions, I focused my research on the two departments of the utility that are engaged in the water services provision-- the Technical and the Commercial Departments. I based my observations on secondary data sources, as well as a survey of 180 employees of GWP and on a series of interviews with key stakeholders. The research used a longitudinal approach and compared staffing levels, labour productivity and wages in the company before and after the divestiture. Further, we assessed dependent variables related to working conditions, such as pay, promotion, work itself, supervision, co-workers and overall job satisfaction.</p> <p>Based on the data collected and analysis, the research allows drawing the following conclusions:</p> <p>After divestiture, overall performance of the Company has improved, as quantity of non-revenue water was reduced, continuity of supply was improved and collection efficiency was increased.</p> <p>Divestiture implicated a decrease in staffing levels of the Company.</p> <p>Labour productivity has increased in the Company after divestiture. The increase can be largely attributed to the introduction of new technology by the private owner.</p> <p>There is no significant effect of divestiture on wages. Although, we have revealed that the average salaries increased in the Company, but salary increase rate in</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				<p>similar sectors, such as electricity, gas and other water suppliers in the country, was higher.</p> <p>Divestiture has positively impacted overall job satisfaction among employees; key indicators that have improved are perspective for promotion, content of the tasks, relations with the co-workers. For one measure that deteriorated after divestiture was satisfaction with supervision due to stricter management practices after the divestiture"</p>
	Global	fitchratings.com	https://www.fitchratings.com/research/corporate-finance/georgian-water-power-llc-22-05-2020	The rating is supported by GWP's natural monopoly position, solid profitability, improving regulatory environment, reducing water losses, good receivables collection rates, asset ownership and low sector risk
	Investment Social	fmo.nl	https://www.fmo.nl/project-detail/54129	<p>Project has a high development impact because the repair of the water infrastructure network will lead to significant energy savings, increased water efficiency and improved service quality for the inhabitants of Tbilisi.</p> <p>The refurbishing of the waste water treatment plant, and the installation of new mini turbines may potentially result in finding objects of cultural importance.</p>
	Rating Lower than expected EBITDA ESC score	fitchratings.com	https://www.fitchratings.com/research/corporate-finance/fitch-revises-georgian-water-power-outlook-to-negative-affirms-at-bb-13-05-2020	<p>Fitch Ratings - Moscow - 13 May 2020: Fitch Ratings has revised the Outlook on Georgia- based Georgian Water and Power LLC's (GWP) Long-Term Foreign and Local-Currency Issuer Default Ratings (IDR) to Negative from Stable and affirmed the IDRs at 'BB</p> <p>GWP has an ESG Relevance Score of 4 for Water and Wastewater due to heavily worn-out water infrastructure and high water losses and for Group Structure due to related-party transactions, albeit decreasing and on market terms.</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
	Lawsuit Safety	humanrights.ge	http://www.humanrights.ge/index.php?a=main&pid=20049&lang=eng	The two families lodged administrative lawsuit to the Tbilisi City Court against the water distribution company Georgian Water and Power (GWP) together with the Tbilisi City Hall. After almost two-year court dispute, Judge Natia Buskadze ordered the Tbilisi City Hall to install warning banners nearby the so-called waterfall on the Tbilisi Sea as well as the construction of the 2, 5 meters high concrete wall alongside the channel to prevent people from climbing over it.
Kasleti-2	Compliance	www.fmo.nl/	https://www.fmo.nl/project-detail/51438	High Level Summary of Project IFC PS compliance status
	Human rights No systematic approach Lack of transparency Lack of legislative standards and norms	www.emc.org	https://emc.org.ge/uploads/products/pdf/%E1%83%B0%E1%83%94%E1%83%A1%E1%83%94%E1%83%91%E1%83%98%E1%83%A1%E1%83%9B%E1%83%A8%E1%83%94%E1%83%9C%E1%83%94%E1%83%91%E1%83%9A%E1%83%9D%E1%83%91%E1%83%90%E1%83%A1%E1%83%95%E1%83%90%E1%83%9C%E1%83%94%E1%83%97%E1%83%A8%E1%83%98_1568016353.pdf	<p>A report, titled "Construction of HPPs' in Svaneti and their impacts on human rights", prepared by the Human Rights Training and Monitoring Center EMC (local NGO) in 2019, mentions Kasleti 2 in a broad context, alongside other similar HPP projects. The context how Kasleti 2 is mentioned there is general at the end the report underlines several key observations (general):</p> <p>In parallel with the emphasis on the state importance of the construction of hydropower plants, it should be noted that, unfortunately, this process is being carried out unplanned, without adopting an energy strategy and proper legislative framework. There is no systematic approach and strategy for hydropower development in the country.</p> <p>An important challenge is to plan the construction of hydropower plants and enter into agreements with investors without pre-defined criteria, which happens through non-transparent procedures and without an involvement of the interested public.</p> <p>Systemic problems include the lack of other relevant legislative standards and norms for environmental, energy, and hydro projects, the neglect of best</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
Mestiachala 1 & 2	rock avalanche incident			<p>international practice, and the obsolescence of outdated Soviet-era norms. In this regard, the projects in which international financial institutions are involved are partly an exception;</p> <p>The study also shown the impact of the HPP project on the property rights of the local population and access to public resources. It should be noted that the main problem in this area is the fact that the state does not recognize the form of traditional / community ownership in Svaneti, which is why the local population cannot register land ownership. Also challenging is the lack of proper legislation governing the resettlement of residents and compensatory measures based on development projects, which in the case of such projects leaves the population hoping only for the good faith of the company or the involvement of international financial organizations in the process.</p> <p>Multiple returns on the Mestiachala rock avalanche incident.</p>
	Protest	bankwatch.org	https://bankwatch.org/blog/svan-communities-block-hydro-development-in-svanetia	17 communities of Upper Svaneti gathered in Mestia for a traditional Svan Council meeting. The protesters restated their demands – discontinuation of over 50 dam projects, including the Khudoni and Nenskra dams and the Mestiachala hydropower plant
	Protest	oc-media.org	https://oc-media.org/features/activists-fighting-georgias-hydropower-boom-complain-of-exclusion-and-repression	Activists fighting Georgia's hydropower boom complain of exclusion and repression – Mestiachala HPP construction site featured
	Declaration	facebook.com	https://www.facebook.com/greenalt/posts/1835202726553844	D E C L A R A T I O N of the general meeting of all Svan communities (Lalkhor). on how hydro power plants in Svaneti will not be constructed including: Khudoni HPP, Nenskra HPP, Mestiachala HPP and other more than 50 HPPs planned in Svaneti!
	Ombudsman Letter to Special Rapporteur on	www.ombudsman.ge	https://www.ombudsman.ge/res/docs/2019111811025966586.pdf	Ombudsman Letter to Special Rapporteur on human rights and the environment Geneva (refers to Mestiachala HPP opposition referred to in above links)

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
	human rights and the environment Geneva			
	Statement of "Greens Movement of Georgia	www.greens.ge	https://www.greens.ge/ka/articles/10	<p>In 2019 due to the natural disaster, during the flood, Mestiachala 1 HPP performed a protective function and was partially damaged, while Mestiachala 2 was not affected by the disaster</p> <p>Statement of "Greens Movement of Georgia" published 30.07.2019 states following:</p> <p>Despite the noisy statements of Svaneti Hydro and the Austrian company rpGLOBAL that the HPPs with having no reservoirs - Mestiachala 1 and Mestiachala 2 are safest and have the least impact on the environment, become a lie. Two floods on the river Meastiachala and these HPPs' happened during the last two years, which had a destructive effect, and as a result, significant damage was caused to the environment (in particular, Mestiachala Valley), various companies and property belonging to the local population.</p> <p>Georgia's Green Movement / Friends of the Earth - Georgia argues argumentatively, accompanying imperfection of HPP design documents and together with the local population, distrusted the operator, categorically demanding the environmental impact assessment report on the Mestiachala-1 and Mestiachala-2 HPP projects and the environmental expertise approved by the order of the Minister of Environment and Natural Resources Protection of Georgia dated 29.08.16. to study the conclusion and make a real analysis.</p> <p>Unfortunately, the government, the investor and the Contractor have not taken any steps to improve the project documentation or the EIA report. Based on the above, we request:</p> <p>All energy generation projects shall be subject to the Environmental Impact Assessment Procedure, for</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				<p>which appropriate amendments shall be made to the Law of Georgia on the Environmental Assessment Code;</p> <p>In order to avoid the devastating impact of global climate change, all ongoing and launched into an exploitation energy generation facility should be reviewed / developed and to be approved by the Ministry of Environment and Agriculture of Georgia, a risk assessment report and a plan of preventive measures</p>
	Statement of "Greens Movement of Georgia	chartuloba.wordpress.com	https://chartuloba.wordpress.com/2018/05/31/%E1%83%A1%E1%83%90%E1%83%A5%E1%83%90%E1%83%A0%E1%83%97%E1%83%95%E1%83%94%E1%83%9A%E1%83%9D%E1%83%A1-%E1%83%9B%E1%83%AC%E1%83%95%E1%83%90%E1%83%9C%E1%83%94%E1%83%97%E1%83%90-%E1%83%9B%E1%83%9D%E1%83%AB/	<p>A complete detailed study of the geodynamic hazards in the catchments of the Mestiachala and Chalaati rivers - an assessment of the types of floodplain outbreaks, and then modelling of their formation possibilities;</p> <p>Determining the intensity of rising river levels during floods and at this time the washing of the bottom and banks, taking into account the composition and condition of the bottom sediments, by hydrological-hydraulic calculation;</p> <p>Drawing up maps of risk zones for areas at risk of geodynamic processes and taking appropriate measures in further dangerous areas based on their specifics (how much they are subject to protection and mitigation);</p> <p>Defining additional mitigation measures to minimize risks (risk assessment report) and preparing a proper commitment plan, making it public;</p> <p>Calculate the project data in the EIA report and make appropriate adjustments to the project</p> <p>Approval of the amount of ecological (sanitary) expenditure in the river Mestiachala (its publication in case of such a document) by the Ministry of Environment Protection and Agriculture of Georgia</p> <p>Carrying out continuous monitoring of geodynamic processes in the process of construction and</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				<p>operation of hydropower plants and its periodic publication;</p> <p>The substation under construction will be moved a few tens of meters away from the residential houses. (On the one hand, we will avoid overlooking the view, and on the other hand, we will reduce the impact of high voltage on the population);</p> <p>The transfer of rare and endemic species from conservation areas to the conservation centers, the creation of their seed bank in order to maintain the gene pool of populations and further reintroduce them;</p> <p>Re-study of the flora during the growing season to obtain more detailed data, to fully influence biodiversity and its mitigation measures, to preserve the habitats of rare and endangered species.</p>
Akhmeta	Human rights – limited access to drinking water	greenalt.org	http://greenalt.org/wpcontent/uploads/2020/01/irakli_macharashvili_statia.pdf	The publication, authored by Mr. Irakli Macharashvili of NGO Green Alternative, states that habitants of Zemo Alvani and Kvemo Alvani villages suffer from limited access to drinking water. According to local habitants, the issue started being observed after the construction of Akhmeta HPP.
Debeda	Public consultation	euwipluseast.eu ecohome-ngo.by gov.ge	https://www.euwipluseast.eu/images/PDF/GE_Consultation_Khrami-Debeda_river_basin_issues_public_questionnaire_EN.pdf http://ecohome-ngo.by/wp-content/uploads/2018/12/EuroAquareport.pdf http://gov.ge/index.php?lang_id=ENG&sec_id=440&info_id=57331 https://www.euwipluseast.eu/en/partners-countries-activities-georgia/georgia-activities/public-consultation-5 https://www.euwipluseast.eu/images/2019/09/PDF/EUWI_Q1_2019_FINAL.pdf	<p>The present screening did not identify any data related to reputational issues regarding Debeda operating (environmental threats, injuries at workplace, complaints, financial losses, etc.).</p> <p>EUWI+ is a project implemented by the OECD, the UNECE and an EU Member State Consortium. Last year (2019) EUWI+ organised public consultation regarding the Debeda HPP.</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
			https://www.facebook.com/euwiplus	
	Government	gov.ge	http://gov.ge/index.php?lang_id=ENG&sec_id=440&info_id=57331	A visit of prime minister is documented.
	Human rights – access to drinking water	eap-csf.eu www.bpn.ge	http://eap-csf.eu/wp-content/uploads/euroaqua.pdf https://www.bpn.ge/article/13487-sopel-dashtapas-mosaxleoba-cqlis-problemis-mogvarebas-itxovs	In 2015 Dashtapa, a village close to Debeda river, demanded to solve the water problem. Dashtapa village with Azeri inhabitants (Marneuli municipality) held a protest rally today demanding to solve the problems of drinking and irrigation water in the center of the village. According to the participants, drinking water is supplied to the village only twice a week, but there is also a problem of irrigation canal that is completely damaged. Marneuli Municipality Gamgebeli met with participants of the protest and promised to solve the problem step by step. According to the Marneuli Gamgeoba, due to high temperatures, the water level has deteriorated on the river Debeda, demand is high and that is why drinking water schedule is so restrained. As per irrigation water the process of rehabilitation is actively underway and by the end of 2016*, the population will have 24 hours of drinking and irrigation water. *As of October 2018 there are no reports about any improvements in Dashtapa village. The opening of Debeda HPP did not improve the life quality in Dashtapa.
	Public consultation	euwipluseast.eu	https://www.euwipluseast.eu/en/partners-countries-activities-georgia/georgia-activities/public-consultation-5	There is no report of this public consultation while a report has been prepared for public consultation regarding other HPPs.
	Transparency	transparency.ge	https://www.transparency.ge/sites/default/files/more_transparency_needed_in_the_partnership_fund.pdf	There are no public data regarding the public involvement in Debeda HPP operating. A lack of transparency is pointed in this report.
Qartli	Environment Population	triodos-im.com	https://www.triodos-im.com/articles/2020/interview-gj-brunink---qartli-windfarm	- 2020 Triodos Bank and Triodos Investment Management have invested in renewable energy for decades. Since

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				<p>2014, they also focus on energy projects in emerging economies. One example of this is Qartli Windfarm, the first ever wind farm in Georgia and the Caucasus Mountains.</p> <p>Qartli Windfarm proved to be an ideal project, Brunink continues: "The wind farm is located at an altitude of 800 meters, 60 kilometres from the Georgian capital Tbilisi. It is a remote and desolate landscape, so the wind farm has no negative impact on people or the environment."</p>
	Better efficiency then expected Funding Employment	euneighbours.eu	https://www.euneighbours.eu/en/east/eu-in-action/stories/wind-farm-gori-successfully-generates-renewable-energy-georgia - 2018	<p>Wind farm in Gori successfully generates renewable energy in Georgia</p> <p>In Gori, around 90 km from Tbilisi, six wind turbines have been steadily generating power for the past two years. Qartli Wind Farm is the first wind farm built in Georgia and the first commercial wind power plant built in the South Caucasus. It was made possible with the support of the European Bank of Reconstruction and Development, along with the European Union and other international donors investing via the Green for Growth Fund.</p> <p>Last year, the wind farm generated around 88 million kilowatt hours (kWh) of power and actually exceeded its forecast by 3.8 million kWh. Based on the annual energy requirements of an average family, the extra power it generated helped cover the energy needs of between 20,000 and 25,000 families.</p> <p>Finally, the turbines were provided by the Danish company VESTAS BENELUX, a leading manufacturer of wind turbines. A loan agreement with the EBRD was reached in January 2016 and the construction works began in March. "We installed the last turbine in September; actually, in six months we created the power plant from scratch," Kazarashvili says.</p> <p>Notably, 70% of the project costs were funded by the EBRD. According to the EBRD, it arranged a €18.3</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				<p>million syndicated loan to the company for the development, construction and operation of the wind farm. The EBRD itself provided an €8.3 million tranche, and the remaining €10 million was contributed by multiple donors, including the Green for Growth Fund (GGF). The GGF is a specialised fund, supported by the European Union, which advances energy efficiency and renewable energy in the EU's neighbouring countries, including Georgia.</p> <p>About 35 people are currently employed by the company. The dispatchers and security staff are local. The power plant will be operated by the company Vestas Georgia for its first 10 years.</p>
	Environment	ebrd.com	https://www.ebrd.com/work-with-us/projects/psd/gori-wind.html	<p>The EBRD is considering extending up to USD 24 million senior loan under the Bank's A/B loan structure to finance construction of the 20MW Wind Power Plant in the Gori municipality of the Shida Kartli region in central Georgia. Qartli Windfarm LLC is a special purpose vehicle established in Georgia for the sole purpose of constructing Gori WPP. Qartli Windfarm LLC is currently 100% owned by Georgian Energy Development Fund "GEDF"), a state owned company established by the Government of Georgia (the "GoG") to facilitate investment in energy projects and the development of the country's renewable energy sector. The Project has been Categorized B in line with the EBRD's 2014 Environmental and Social Policy.</p> <p>The primary reason for the categorization is due to the relatively small footprint of the proposed project (6 turbines / 20MW total installed capacity) and its location in a modified environment that presents little or no environmental and social sensitivities that cannot be adequately mitigated. The Company commissioned an independent firm of international consultants to undertake a focused impact assessment and project appraisal against the Bank's requirements and Good Industry Practice. The impact assessment focused on</p>

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				the key risks such as potential project impacts on the visual landscape; shadow flicker and noise impacts on local communities; impacts to avian biodiversity; and a variety of short-term construction related impacts.
	Transparency	voiceofrenewables.com	https://voiceofrenewables.com/georgia-capital-acquires-gartli-wind-farm/	Georgia Capital acquires Qartli Wind Farm – 2019, provides high-level information about the transaction
Bodorna	Technology Social	georgiacapital.ge	https://georgiacapital.ge/ir/news/georgia-capitals-water-utility-business-commissions-bodorna-hydro-power-plant	Georgia Capital PLC (the Group or Georgia Capital), announces that the Group's water utility business, owned through Georgia Global Utilities ("GGU" or the "Company"), has today commissioned its' 2.5 MW Bodorna hydro power plant ("HPP"). The HPP has been constructed with best in class European equipment and is located approximately 55 kilometers from Tbilisi. The construction started in November 2017 and total project costs have totalled GEL 10 million, financed through a long-term loan facility obtained from the Dutch (FMO) and German (DEG) development banks. A dam-fed plant developed on GGU's existing infrastructure, Bodorna HPP has a 10-year fixed price Purchase Power Agreement with the Georgian Government in place, guaranteeing its electricity selling price for 8 months each year in the amount of 6 cents per kilowatt-hour. The HPP is expected to have total generation of 15 GWh per annum.
	Employment Environment	agenda.ge	https://agenda.ge/en/news/2017/2752	Georgia's Economy Minister Dmitry Kumsishvili participated in the HPP construction launch ceremony and highlighted that this will be an ecologically clean and so-called "green HPP", which has a minimal impact on the environment. A total of 10 million GEL will be invested (about \$3.90m/€3.30m*) in the construction of the 2.5MW Bodorna HPP, which will have an average annual electricity production capacity of 15 million KW/hours. Georgian Water and Powers has secured long-term credit facilities totalling a combined 10 million GEL, from

BUSINESS Site/ Country	Topic/Title	Source	Website Link	Finding
				<p>Dutch (FMO) and German (DEG) development banks to finance the construction of the Bodorna HPP.</p> <p>Bodorna HPP construction will be supervised by Swiss engineering company Stucky SA.</p> <p>More than 50 people will be employed at construction works.</p> <p>Bodorna HPP is expected to become fully operational from September 2018.</p>

ERM has over 160 offices across the following countries and territories worldwide

Argentina	The Netherlands
Australia	New Zealand
Belgium	Norway
Brazil	Panama
Canada	Peru
Chile	Poland
China	Portugal
Colombia	Puerto Rico
France	Romania
Germany	Russia
Ghana	Senegal
Guyana	Singapore
Hong Kong	South Africa
India	South Korea
Indonesia	Spain
Ireland	Sweden
Italy	Switzerland
Japan	Taiwan
Kazakhstan	Tanzania
Kenya	Thailand
Malaysia	UAE
Mexico	UK
Mozambique	US
Myanmar	Vietnam

ERM's Romania Office

145 Calea Victoriei, 8th floor Victoria
Center, District #1, 010072
Bucharest, Romania Add address 1

T: +40 31 405 16 80

F: +40 31 405 16 81

www.erm.com