Draft Environmental and Social Impact Assessment – Part 5

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GEO: Adjaristsqali Hydropower Project

Prepared by Mott MacDonald for Adjaristsqali Georgia LLC

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Stakeholder Engagement Plan

July 2011 Clean Energy Invest As



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1. Introduction

1.1 Overview

The Government of Georgia's energy policy is to achieve economic independence and sustainability of the sector as well as provision of energy security through domestic resources and diversification of imported energy carriers. In addition Georgia considers electric power to be an export commodity and is aiming to develop this potential.

Clean Energy Invest AS (CEI) has been awarded the development rights for the Adjaristsqali Hydropower cascade Project in Georgia after a competitive tender involving three other companies. CEI is a Norwegian based hydropower company who aim to develop hydropower opportunities in countries with functioning electricity sector and untapped hydropower potential. This will be the first project to be developed by the company. The project is located on the Adjaristsqali River in southern Georgia in close proximity to the border with Turkey. The International Finance Corporation (IFC) is one of the investors in the scheme.

The project is expected to have an installed capacity of 175-300 MW. The scheme is currently considering a cascade consisting of between two and five hydropower stations with an annual average production of between 700 and 1200GWh of renewable electricity. The Adjaristsqali Hydropower cascade project will supply the Georgian and Turkish power systems with renewable energy, with most of the electricity being exported to Turkey (assumed 83%).

The final design will be based on the outcomes of the feasibility study which is being undertaken in parallel with the Environmental and Social Impact Assessment (ESIA). The construction cost is estimated to be between 350-650 million USD.

CEI has commissioned Mott MacDonald Limited (MML) and Gamma Consulting Limited (GCL) to assist with the development of the ESIA for the Project in parallel with the feasibility studies being undertaken by MML.

This Stakeholder Engagement Plan (SEP) is a key deliverable of the project, and it has been developed at the outset of the ESIA process to guide stakeholder engagement and public consultation activities throughout the ESIA process and throughout the construction and operation of the project. This document can be read as a stand alone report and will remain a live document throughout the development of the project. It will also be included as an appendix to the Environmental and Social Scoping Document (ESSD) document.

1.2 Project Description

1.2.1 Overview

The Adjaristsqali Hydropower Cascade Project (from here on referred to as the 'Project') is a proposed 175 - 300 MW cascade scheme. The cascade scheme will extend across over 80 km of the Adjarastsqali River, with the top of the scheme beginning at the confluence of the Adjaristsqali and Ghorjomi rivers all the way down to the confluence of the Adjaristsqali and Chorokhi River at the bottom of the scheme.



The Project, which has undergone pre-feasibility assessment and initial optimisation, is currently undergoing a full feasibility assessment by Mott MacDonald, which will optimise the project further based on geotechnical investigations and identification in situ of suitable project sites. Therefore at this early stage of the project feasibility study there remain a number of options and configurations that are being considered.

The scheme is split into four sections; three sections are upstream of an existing 16 MW run-of-river project (the "Adjaristsqali HPP") and the fourth downstream. Figure 1.1 below provides an overview of the entire scheme and options being considered.



The current options being considered include up to four hydropower plants (HPP) on the banks of the Adjaristsqali River, with both underground and above ground power houses being considered. Water will be collected from dams and weirs along the Adjaristsqali and its tributaries, and routed through a combination of above ground pipes, underground transfer tunnels and headrace tunnels to the HPPs. The river between the dam/weir sites and the HPP will experience significantly reduce flows and changes to flow regime. In order to maintain sufficient water flow to meet environmental and downstream water user requirements, a minimum environmental flow will be determined and released at each of the weir/dam sites.

The number of weirs and dams that the scheme will have is dependant on the final options chosen, however the project could have up to six dams and nine weirs.

1.2.2 Key Project Components

A run of river scheme differs to traditional large hydropower projects in that the ROR generally does not involve large storage volumes as in traditional hydropower. A dam or weir is used to create enough pondage behind the dam or weir to allow the intake channel/pipe to have sufficient water and head before entering headrace (tunnel, channel or pipeline) to the powerhouse at a lower elevation. Run of river schemes rely on having a good height difference (head) between an area suitable for the intake upstream and an area suitable for the powerhouse downstream and a good sized catchment area (watershed) from which water will drain into the river or burn, Gross head is defined as the difference in elevation between the intake and the powerhouse.

Key project components are defined in the following subsections, Figure 1.2 provides a simple schematic of the key structures which make up a run of river scheme.







Source: MML

1.2.2.1 Weir/Dam

The Project will consist of a combination of Tyrolean weirs and concrete dams:

- Tyrolean Weir structure is generally built into the river bed, it acts to abstract water from the main flow through a screen which then drops down into a surge shaft or other tunnel and diverted to the powerhouse.
- Concrete Dam dams will range between 6m and 45m in height; they will provide some storage as well as increase the head available for the project.

1.2.2.2 Intake

Intakes are situated behind the dam or at the weir, there will be either a channel, tunnel or surge shaft taking the water away from the site to the powerhouse.

1.2.2.3 Headrace (tunnel, pipeline, channel)

As part of this project, the majority of the headrace structures will be underground tunnels carrying water from the intake to the powerhouse. In some cases the underground tunnels will simply be transfer tunnels are carrying water from one part of the system to another. In total approximately 80 km of underground tunnels are anticipated for this project, their final size, length, routing and theconstruction methods to be used are being assessed as part of the feasibility study.



1.2.2.4 Powerhouse

The powerhouse contains the turbines and generators as well as ancillary equipment. The structure can be located either above ground or underground. At this early stage in the projects optimisation, the exact types and sizes of turbines which will be used has not yet been defined and this may vary at each of the powerhouses proposed.

1.2.2.5 Tailrace

The tailrace the outlet of the powerhouse, returning waters back to the river once the water has been through the turbines.

1.2.2.6 Transformer and Switchyard

To export the energy generated at the powerhouse, the power will have to be stepped up using a transformer to connect into the 220kV transmission line. There will also need to be a switchyard (either above ground or underground) to allow the transformers to be connected to the transmission line. .

1.2.2.7 Transmission line

Power will need to be exported from the area to the wider national grid as well as connected to the grid for export to Turkey. The Project will require the existing transmission line to be upgraded to 220kV and connect to the existing substation in Batumi. At this time it is expected that the transmission line will replace the existing 132kV/66kV and follow its route. However, given the increase in transmission line size, this will result in an increase in the size of the right of way.

1.2.3 Description of Cascade Scheme

The following sections provide detailed descriptions of each of the individual components of the cascade scheme and all the options currently being considered within them.

1.2.3.1 Zomleti HPP

The Zomleti HPP consists of a weir (Dia 1) on the Diakondize River, a weir or dam (Adj 7) on the Adjaristsqali River, a weir (Chi1) on the Chirukhistsqali River, and a dam (Skh1) on the Skhalta River (see Figure 1.3).

The current options assessment is considering a 30 metre high dam at Skhalta, which will create some storage in the scheme thereby allowing for daily retention of water during the low flow season in the summer that can be released to supply electricity for the daily peak demand period. This is however subject to confirmation of suitable geological conditions at the proposed dam and reservoir location. Similarly a 45 metre high dam is being considered at Adj7, but at present this is also subject to change if no suitable location for a large dam structure can be identified due to geological constraints. The extent and volume of the reservoirs will be defined once final options are chosen and more detailed topographic data becomes available. For the Skhalta dam the design is taking into account the village of Tsipnari as a constraint.

All of the above dam and weir sites will be connected through a series of underground tunnels (except for short above ground pipeline from Dia 1 to Adj 7), which will collect and transfer all the water to a headrace tunnel and onwards to the Zomleti HPP (Adj 6b). The total tunnel length is approximately 24 km. Water collected at each of the dam and weir sites will then return to the river at the Zomleti HPP location, this means that a portion of the Adjaristsqali and Chirukhistsqali Rivers will experience reduced flows.





Source: MML

1.2.3.2 Dandalo HPP

Dandalo HPP (seeFigure 1.4 Adj 4b) consists of one 25m high dam (Adj6a) on the Adjaristsqali River and weirs on the Vanistsqali (Van1), Chvanistsqali (Chv2), and Shavitrestsqali (Sha1) tributaries (as shown in Figure 1.4). The headrace tunnel from the Dandalo dam is routed via the three tributaries, which allows for additional water to be collected for power generation. Surge shafts (vertical tunnels) will be constructed at the tributary weir locations, thus dropping the water down into the headrace tunnel below. The total tunnel length for this scheme is approximately 14km. A reservoir will be created behind the Dandalo dam, however this has not been designed to hold any significant storage capacity. The extent and volume of the reservoir will be defined once more detailed topographic data becomes available.

Another configuration being considered for Dandalo is to simply have a shorter transfer tunnel directly from Dandalo dam (Adj6a) to an alternative power house location at Adj5b without diverting any flow from the Vanistsqali, Chvanistsqali and Shavitrestsqali tributaries. This also enables other options in the configuration of the lower part of the scheme.





Source: MML

1.2.3.3 Combined Zomeleti and Dandalo

An alternative option to separate HPPs for Zomeleti and Dandalo, is to combine both of these schemes and have only one HPP at Dandalo. The combined scheme will remove the need for power station and dam at (Adj6a). As with all other options, whether or not this option goes forward is dependent on the geological investigations and tunnelling requirements.

1.2.3.4 Vaio HPP

The Viao HPP component of the scheme also currently has two options under consideration, which are related to alternative options considered for the Dandalo scheme.

Assuming the Dandalo scheme diverting flow from the Vanistsqali, Chvanistsqali and Shavitrestsqali tributaries is chosen, then the Vaio option will have a dam at Adj4 of approximately 13 m. The Viao dam would then be connected to the Viao HPP (Adj2b) via a 19 km headrace tunnel which would collect water from the weirs on the Akarevta River and its tributary (Aka2 and SB1 respectively).

The alternative, should the shorter tunnel option on the Dandalo scheme be chosen, is to have a dam at Adj 5a in order to divert water by construction of a weir (Chv1) on the Chvanistsqali River. This option would result in a longer tunnel length for the Viao scheme. A reservoir will be created



behind the Vaio dam (Adj4 or Adj5a), however this has not been designed to hold any significant storage capacity. The extent and volume of the reservoir will be defined once more detailed topographic data becomes available.



Source: MML

1.2.3.5 Chorokhi HPP

The Chorokhi HPP is proposed to be located at the confluence of the Chorohki and Adjaristsqali rivers. The Chorokhi dam (Adj1) is approximately 13m high, with the headrace tunnel being routed from the dam directly to the Chorohki HPP. One of the constraints of the extent of the reservoir for the Chorohki dam is the presence of the outfall of the existing "Adjaristsqali HPP" as well as a 13th century historical bridge. However, in addition water will also be transferred by tunnel from a weir on the Machakhlistsqali River, which is a tributary of the Chorohki Rivier. The approximate tunnel length is 13km. The Chorokhi River is an international waterway originating in Turkey and emptying in the Black Sea. Several hydropower projects have already been constructed on the Chorokhi River in Turkey.







Source: MML

1.3 **Project Location**

The Adjara Autonomous Republic (Adjara) is situated on the Black Sea littoral in the south-west of Georgia, as shown in Figure 1.7. It is bordered by Turkey to the south, the Meskheti mountain range to the north; the Arsiani mountain range to the east and the Black Sea to the west. The area comprises 2,900 km² and constitutes 4.2% of the whole territory of Georgia. Adjara is comprised of five administrative units – Kobuleti, Khelvachauri, Keda, Shuakhevi and Khulo.







Source: MML

The status of the Adjara is determined by the Constitutional Law of Georgia "On the Status of the Autonomous Republic of Adjara" (added to the Constitutional Law of Georgia of 20 April 2000). Adjara remains part of Georgia and is governed in accordance with the principles of the constitution of Georgia.

The Project will directly influence the municipalities of Khelvachauri, Keda, Shuakhevi and Khulo within Adjara. The municipalities are mostly rural with a total population of approximately 176,000. Ethnic Georgians (largely of Christian Orthodox and Muslim denomination) represent the majority of the local population. Depending on the altitude the main income source for the local population consists of growing vegetable (potato, tomato, etc.), fruits, tobacco, grapes, and cattle farming.

The climate of the Adjaristskali River basin is characterised by zoning and is influenced by the Black Sea, landforms and air flow circulation patterns. The area belongs to the moderate humid subtropical climate zone. The climate in the mountainous region can be harsh in winter and as a result some of the villages in the region are not accessible in winter.

According to the meteorological stations at Khulo, Keda, Purtio and Makhuntseti, average air temperature for the proposed area varies between 10.4-13.1 °C. Absolute minimum and maximum temperatures are; Khulo -18 °C - +39 °C; Keda -15 °C - +42 °C; Purtio -15 °C -+41 °C. Annual precipitation as recorded at Khulo is 1321mm a year and at Keda 1652mm. In the upstream reaches of the basin the prevailing the wind direction is north and south while downstream, east and west winds dominate. The wind speeds vary between 2.6 - 1.2 m/sec.

The Project region is highly sensitive to various natural hazards including mudflows, erosion and landslides . The river Adjaristsqali originates from the western part of the Arsiani mountain range at 2435m above sea level, 1 km east of the Chanchakhi Mountains. The upper region of the river basin is very narrow with steep slopes. The total length of the river is 90km with a catchment area of 1,540km² and average inclination of 26.6%. The river has 988 tributaries, with a total length of 2,165km. The largest of which are: Satsikhuri (14km), Skhalta (29km), Chirukhistskali (32km), Chvanistskali (21km), Akavreta (19km). The sources of recharge are snow (26%), rain (44%) and groundwater (30%).



High flows are mainly observed in spring, beginning in mid March and lasting until the end of June, early July. A shorter high flow season is also experience again in Autumn from November to December.

The region is rich in natural resources, including mineral and thermal waters. Existing industrial developments identified to date within the project area include the include Machakhela and Acharistskali hydropower plants, and the mineral water "Kokotauri" water bottling factory (village Kokotauri, Keda municipality), and fish farming activities on tributaries of the Adjaristsqali.

The region is rich in cultural heritage and several features of note are present within the project area, which include:

- Gonio, Zendidi, Saghoreti, Kaviani, Tsivasula, Okropilauri, Darchidzeeb fortresses;
- remains of the Nigazeuli, Takidzeebi, Khichauri (Kaviani), and Khikhani fortresses;
- medieval arch bridges of Dandalo, Makhuntseti, Varjanauli, Furtio and Uchkho;
- remains of churches in Thkhilvana, Vernebi, Kaloti, Satsikhuri, Tikanauri, Vanadzeebi villages;
- Skhalta and Annunciation churches; and
- several mosques and museums (Museums of Local Lore in Keda, Khulo and Khelvachauri; Abuserisdze Tbeli (in Tkhilvana) and Khimshiashvili (in Skhalta) museums, Art Gallery in the Khulo district centre; Museum of Ethnography in Kakhaberi village (Khelvachauri), etc)

Information on the environmental and social characteristics of the project area has been obtained from a wide range of sources, all of which are publicly available. Initial biodiversity and hydrological surveys have already been carried out. Additional detailed surveys, including cultural heritage, fisheries, additional hydrology data, noise, and traffic data to name a few will be undertaken between August and October.



Figure 1.8: Municipalities and Villages within the Project Area

Source: MML



1.4 The Environmental and Social Impact Assessment (ESIA)

The ESIA is required to meet both national Georgian legislation as well as the international standards of the International Finance Corporation (IFC) and potentially the European Bank for Reconstruction and Development (EBRD) (project financiers). The purpose of the ESIA process is to ensure that the project is designed and developed in a manner that avoids, reduces and mitigates negative environmental and social impacts, while maximising project benefits.

The IFC and EBRD consider appropriate and meaningful consultation as integral to project planning and development. As such, one requirement of international standards is the production of a Stakeholder Engagement Plan (SEP) to ensure that appropriate consultation and engagement with the public and relevant stakeholders is undertaken.

Under Georgian law public consultation is required for projects which are mandated to undertake and ESIA after publication of the draft Final ESIA. There is no legal requirement to identify specific stakeholders or disseminate information prior to the final ESIA.

Georgia is a party to the Aarhus Convention according to which communities must have timely and informed consultation, be provided with free access to information, have the right to participate in decision-making, and have access to justice in environmental matters, in order to protect people's rights to live in a healthy environment.

1.5 Stakeholder Engagement Plan (SEP) Objectives and Components

An SEP is a strategic document for planning a comprehensive and culturally appropriate approach to consultation and disclosure for the lifecycle of the project. It is underpinned by the principles that community engagement should 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. Consultation activities should always be well planned and based on principles of respectful and meaningful dialogue.

The purpose of this SEP is to provide a consultation and participation strategy for the project which:

- Identifies people or communities that are or could be affected by the project, as well as other interested parties;
- Ensures that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation;
- Maintains a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation; and
- Meets legal requirements related to consultation.

The key components of effective stakeholder engagement are summarised in Figure 1.9 below,







Source: International Finance Corporation (2007): 'Stakeholder Engagement: A Goof Practice Handbook for Companies Doing Business in Emerging Markets

1.6 Structure of this Report

This SEP is organised by chapters to cover:

- Regulations and requirements;
- Review of consultation and disclosure previously carried out on the project;
- Identification of stakeholders;
- The disclosure and consultation implementation programme;
- Details of a timetable for consultation and disclosure;
- Resources and responsibilities for the implementation programme;
- The grievance mechanism; and
- Reporting requirements.



2. Regulations and Requirements

2.1 Overview

This SEP has been undertaken to meet international requirements as well as the national legislation and policy regulations of the Government of Georgia (GoG) and to meet the information disclosure, consultation and stakeholder engagement requirements of the international project financiers. These requirements are summarised in the remainder of this section.

2.2 National Requirements

This section outlines the Georgian national legislation and regulatory requirements in relation to consultation, disclosure and stakeholder engagement.

The environmental permitting system is governed by the Law of Georgia on Environmental Impact Permit (2007); Law of Georgia on Protection of Environment (enacted 1996, amended 2000, 2003, 2007); Law of Georgia on Licenses and Permits (2005); and Law of Georgia on Ecological Assessment (adopted in 2007).

The Constitution of Georgia guarantees public access to information and states the right of an individual to obtain full, unbiased and timely information regarding his/her working and living environment. Public participation in project development is regulated under the Law on Environmental Impact Permit (2007). The Law also provides a list of activities subject to environmental and social impact assessment (ESIA). According to paragraphs 6 and 7 of the Law, the project developer is required to prepare an ESIA and is responsible for public engagement, which includes announcing public disclosure of the document in both central and local media. The law states that public participation and provision of access to information are obligatory procedures of the environmental permitting process. This is conducted in the form of a public discussion of the proposed activity with participation by the investor, the Ministry of Environment Protection and local administrative authorities.

Public consultation is only required by Law on completion of the draft Final ESIA. Scoping workshops or on-going consultation during the construction and operational phases are not required by law. Projects which do require an EIA are mandated to conduct public hearings within 50 days of publishing the draft ESIA. There are no additional requirements for disseminating information, either by means of leaflets, posters and/or other visual displays, or radio/television, nor are there any requirements to identify possible stakeholders (including vulnerable groups) and ensuring their participation.

2.3 International Requirements

This sub-section summarises the stakeholder engagement requirements of the two key potential project lenders, the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD).



2.3.1 International Finance Corporation (IFC) Requirements

The International Finance Corporation (IFC) was established in 1956 and is the known as the private sector arm of the World Bank Group. Public consultation, disclosure and stakeholder engagement are key requirements of IFC's Policy on Social and Environmental Sustainability embodied within the Performance Standards (April 30, 2006, being updated in 2011).

The eight IFC Performance Standards are applicable to private sector projects in emerging markets. Each Performance Standard has specific consultation requirements and these are embedded in the general requirements specified in *Performance Standard 1: Social and Environmental Assessment and Management Systems.* These requirements specifically refer to the need for and means of achieving community engagement, disclosure of relevant project information, appropriate consultation processes and grievance mechanisms throughout the project lifecycle. The requirements for stakeholder engagement in projects are:

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

IFC seeks to provide accurate and timely information regarding its investment and advisory activities as well as more general institutional information in accordance with its Access to Information Policy (draft 2010). IFC's Access to Information Policy states that for all Category A and B projects proposed for financing, a summary of its review findings and recommendations will be disclosed and include as a minimum the following information:

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

In addition to the above, general financial and investment information will also be provide by IFC. Project or investment information, once published by the IFC, will be disclosed through their Disclosure Portal at <u>http://www.ifc.org/disclosure</u>. Relevant environmental and social information must be made publicly available for at least 60 days prior to consideration of investment approval by IFC's Board of Directors (or other relevant authority).

2.3.2 European Bank for Reconstruction and Development

Many development banks have disclosure policies that are an internal requirement. The Environmental and Social Policy (2008) and Public Information Policy (2008) documents outline EBRD's key policies with regards to information disclosure and stakeholder engagement.

Similarly to the IFC, EBRD requires the project sponsor to provide the public, including NGOs, with information about the project during scoping stage and to prepare an SEP. This SEP meets that requirement, and outlines how disclosure and consultation will occur throughout the EIA process and project implementation as well as detailing future disclosure and consultation.



The 2008 EBRD policy requires project sponsors to engage with stakeholders from the earliest stages of the project throughout the life of the project. Stakeholder engagement must be open, meaningful, and in an appropriate manner acceptable to the potentially affected communities. The engagement program must actively address the needs of vulnerable populations who may be affected by the project. The EIA documents must remain in the public domain for the life of the project, and if changes to project plans are necessary, these have to be made public as well.

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

2.3.3 Public Consultation Requirements under the EU

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

The Directive requires that public participation for projects which may have environmental and/or social impacts takes place early in the decision making process and alternatives are presented. As the project develops, the public is to be provided with relevant information. Public comments must be taken into account and any rejection or disregard of the comments needs to be clearly justified. The public is to be notified of decisions made and the reasons for the decisions. The Directive provides members of the public with the right to challenge decisions or actions based on substantive or procedural legality.

EU Directive 2003/4/EC (repeals Directive 90/313) on Public Access to Environmental Information also grants right to the public to access information either held by public authorities or for public authorities and incorporates the provisions and requirements of the Aarhus Convention on public access to environmental information, with a wider remit than that applicable under the EIA directive.

2.3.4 International Conventions on Public Consultation

Similar requirements for access to information and public involvement in decision making are also specified within the following international conventions:

Agenda 21. (UN, 1992b) Article 27(9) states that the UN system should "provide access for nongovernmental organizations to accurate and timely data and information to promote the effectiveness of their programs and activities and their roles in support of sustainable development".

Rio Declaration on Environment and Development (1992). Annex 1 Principle 10 - "Each individual shall have appropriate access to information on hazardous materials and activities in their communities [...] States shall facilitate and encourage public awareness and participation by making information widely available".

UN General Assembly Resolution A/RES/S-19/2 (1997). Paragraph 108 - "Access to information and broad public participation in decision-making are fundamental to sustainable development".

The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice in governmental decision-making processes on matters concerning the local, national and transboundary environment. The Company must have a procedure or policy in place



that allows right of access to environmental information to any person. Relevant project information related to environmental and social issues must be made available free of charge.



3. Previous Stakeholder Engagement

3.1 Overview

It is essential to engage stakeholders early in the development process to encourage their support and input in pursuit of improved outcomes and long-term sustainability. This approach is based on best international practice and requirements. Therefore, as part of the ESIA and to inform the project feasibility and initial scoping phase it will be important to engage in effective consultation with an appropriate range of stakeholders.

3.2 Initial Project Disclosure Activities

Since being awarded the concession for this project CEI has engaged in an number of meetings with the government and the project has been publicised on television by Vera Kobalia, Minister of Economy and Sustainable Development of Georgia. In addition the following meeting have been held:

- 10th of March 2011, CEI had a meeting with the Levan Varshalomidze, Chairman of the Autonomous Republic of Adjara.
- 4th of May 2011, CEI representatives met with Grigol Tsamalashvili the Deputy Minister of the Ministry of Finance for Adjara.
- On the 10th June 2011 a ceremony was held on the signing of the project Implementation Agreement by the Georgian government, the ceremony was attended local government and by Alexander Khetaguri, Minister of Energy and Bard Mikkelson, Clean Energy Invest Executive Chairman.

CEI prepared a press release and brochure in English specifically for the signing ceremony, it provides an overview of the project, feasibilities studies undertaken to date, brief description of the developer and companies contracted for development of the feasibility study and ESIA.

On the 14th of June 2011, a project disclosure meeting was held in Khulo to introduce the project in more detail to the municipalities within which the project is located. The meeting was attended by heads of local councils, chief executives of the municipalities within the project area, representatives of local administration, and the deputy minister of Finances and Economy for Adjara. A full list of attendees is included in Appendix A. The meeting consisted of a brief presentation by CEI's Project Director, followed by a brief presentation on the ESIA process and objectives of assessment by both Mott MacDonald and Gamma. Media coverage was provided by journalists from local newspaper Adjara and Adjara TV channel.

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

The following table provides a summary of the initial disclosure of the project in the media (TV, newspapers, and online).



Table 3.1: Adjarastsqali Cascade HPP Project in the media

Description	Date	Media	Language
Announcement of project by Ministry of Energy	?	Ministry webpage	Georgian
Information on proposed construction of the Project and implementation agreement signing ceremony	11.06.2011	Reports on National TV channels; Public TV, Imedi, and Rustavi 2.	Georgian
Information on proposal to develop the Project and interviews with Gross Energy (local consulting supporting feasibility study)	11.06.2011	Report on Adjara TV Article in "Adjara" newspaper	Georgian
"Construction of HPP Launches on Adjaristsqali"	11.06.2011	Online article www.onlinenews.ge	English
Initial project disclosure meeting to heads of municipalities within which the project is located	15.06.2011	Adjara TV	Georgian
"Signing of Implementation Agreement for up to 660 mln USD Adjaristsqali river hydropower project between the Georgian Government and Clean Energy Invest AS"	15.06.2011	Online article http://commercial.ge	English
"Clean Energy Invest AS to Develop HPP Project in Adjara"	17.06.2011- 23.06.2011	Online article http://georgiatoday.ge	English

Source: Clean Energy Invest AS

The objectives of these engagement activities were to:

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



4. Stakeholder Identification and Analysis

4.1 Overview

The first step in the process of stakeholder engagement is stakeholder identification, a process of determining who the relevant stakeholders are and which groups they belong to. Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and / or the ability to influence its outcome, either positively or negatively. Stakeholders can include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or businesses.

4.2 Approach to Stakeholder Identification and Analysis

At this stage of the project an initial list of stakeholders has been put together based on desktop review and early discussions with municipality leaders. The process started with identification of potential impacts associated with the planned development and specification of the project's geographic sphere of influence. A list of all the settlements within the potential project impact zone has been identified and some socio-economic data collected with regards to activities and businesses within the area of interest. Apart from primary project sites, related facilities such as roads and infrastructure as well as cumulative impacts, will also be taken into account as the project develops and becomes more defined, which may require additional stakeholders to be considered.

Consideration has also been given to identification of potential NGOs and interest groups working in the region. Identification of international NGOs and involving them in the process has been identified as an important consultation activity to contribute to the efficiency of the impact assessment process and as a peer review of the proposed ESIA terms of reference. Initial analysis has been carried out to determine which stakeholders might be affected and in what way. The most important objective of this exercise was to identify those directly and/or adversely affected by the project at different stages of development with focus on identifying any vulnerable groups.

Additional information on relevant stakeholders will be obtained during the initial scoping meetings, as well as through data being gathered at this time by CEI on land use and land ownership within the direct area of influence. Information sharing and cooperation with the latter will contribute to higher efficiency of community involvement/participation and accuracy of environmental and social impact assessment process.

It is not practical, and usually not necessary, to engage with all stakeholder groups with the same level of intensity all of the time. This SEP has aimed to be strategic and clear as to whom the Project should engage with and why. This has been achieved through a process of prioritizing the relevance of the stakeholders and, depending on who they are and what interests they might have, determining the most appropriate ways to engage with them.

This stakeholder analysis process has the objective of assisting in this prioritization by assessing the significance of the project to each stakeholder group from their perspective, and vice versa. It is important to keep in mind that the situation is dynamic and that both stakeholders and their interests might change over time, in terms of level of relevance to the project and the need to actively engage at various stages. For example, some stakeholders will be more affected by a particular phase of a project, such as construction activities. When assessing the relevance of and prioritizing stakeholders, consideration has been given to the following:



- What type of stakeholder engagement is mandated by law or other requirements?
- Who will be adversely affected by potential environmental and social impacts in the project's area of influence?
- Who are the most vulnerable among the potentially impacted, and are special engagement efforts necessary?
- At which stage of project development will stakeholders be most affected (e.g. procurement, construction, operations, decommissioning)?
- What are the various interests of project stakeholders and what influence might this have on the project?
- Which stakeholders can best assist with the early scoping of issues and impacts?
- Are there vulnerable groups in the project area or topics that are particularly sensitive or controversial?
- Who is it critical to engage with first, and why?
- What is the optimal sequence of engagement?

Obtaining an understanding of the relevance and prioritization of stakeholders is an iterative process that will evolve throughout the ESIA process as a better understanding of impact evolves and as different stakeholder groups are engaged and given an opportunity to express their concerns and interests through the implementation of this SEP. The evolution of this understanding should be reflected in the ongoing revisions required of this SEP as scheduled for in Section 6.

At the outset of the ESIA process (i.e. at the time of producing this initial SEP), the first task is to:

- a. Categorise stakeholders into groups of common characteristics; and
- b. Identify the stakeholder relevance in terms of how they are impacted by, or interested in the Project

These two considerations are discussed below.

4.2.1 Stakeholder Categorisation and Means of Engagement

Each of the stakeholders has been categorised into one of nine groups as listed in Table 4.1 which also identifies the ways in which each stakeholder is likely to be best engaged. Appropriate methods of engagement have been selected with consideration of each stakeholder group's relevance (the extent to which the Project will influence them or to which they can influence the Project), their level of literacy, comfort with engagement culture and environment (e.g. office meetings vs. community meetings) and the need for focussed topic specific discussions as opposed to disclosure of general information.

Stakeholder Group	Public meetings and exhibitions	Private meetings and workshops	Focus groups	Mass Media communications	Disclosure of written information	Community liaison
Local Project Affected Communities	\checkmark		\checkmark	\checkmark	\checkmark	\checkmark
Physically and economically displaced Project Affected People (PAPs)	~	~	\checkmark	~	~	\checkmark
Employees and labour	✓	\checkmark		\checkmark	\checkmark	
International and Regional Governmental Bodies & Financial Institutions	~	~		~	~	
National Government Departments	\checkmark	\checkmark		\checkmark	\checkmark	
National Bodies	\checkmark	\checkmark		\checkmark	\checkmark	

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1 able 4.1:	Stakeholder	Groups and	INIethods	of Engagement



Stakeholder Group	Public meetings and exhibitions	Private meetings and workshops	Focus groups	Mass Media communications	Disclosure of written information	Community Iiaison
Provincial / Local Government Departments	~	\checkmark		~	\checkmark	
Civil Society, NGOs & Research Bodies	✓	✓	✓	✓	\checkmark	
Industry & Business	\checkmark	\checkmark	\checkmark	\checkmark		
Media & Press	\checkmark			\checkmark		

4.2.2 Stakeholder Relevance

The relevance of each stakeholder to the Project has been considered in terms of whether they are:

- "Impact based": directly affected stakeholders through adverse and beneficial Project impacts such as physically or economically displace groups or individuals – the intensity of engagement will be greatest with impact based stakeholders and special efforts will need to be made to reach out to disempowered, socially excluded and/or vulnerable groups who may not have a good understanding of their rights or entitlements and may not be familiar with engagement activities; or
- "Interest based": who may have an interest in influencing the Project for their own objectives and be able to influence the Project or public perception, for example NGOs – it is important to ensure that potential critics of the project and those who can positively influence the Project design are appropriately engaged at the correct times in order to facilitate their effective input and to manage potential negative perceptions.

It is important to note that "impact-based" stakeholders are on the whole "interest based as well;" for example local communities may be impacted by construction activities and effects, such as noise and dust, whilst at the same time they have an interest in leveraging community benefits and employment opportunities.

The full list of relevant Stakeholder groups, organisations and their relevance as identified for the project to date is provided in Table 4.2 below. It is expected that the number of impact based stakeholders will increase as the ESIA process progresses.



Table 4.2: Project Stakeholders

Stakeholder Groups	Stakeholder Bodies	Relevance to project: "impact-based" or "interest-based"	Previous Engagement
Local Project Affected Communities – Khulo Municipality	Didachara community village; Didachara	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
	Lekanashvilebi community villages; Diakonidzeebi, Duadzeebi, Tsifnari	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
Local Project Affected Communities – Shuakhevi Municipality	Chvani community village; Varjanauli	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
	Zomleti community village; Zomleti	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
	Oladauri community villages; Paposhvilebi and Matskvalta	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary research period
Local Project Affected Communities – Keda Municipality	Makhuntseti community villages; Qveda Makhuntseti and Qveda Bzubzu	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
	Pirveli Maisi community village Pirveli Maisi	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
	Qeda community village Koromkheti	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
	Merisi community villages; Sikhaldzeebi and Inasharidzeebi	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period



Stakeholder Groups	Stakeholder Bodies	Relevance to project: "impact-based" or "interest-based"	Previous Engagement
	Chvani community villages; Dandalo and Baladzeebi	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
Local Project Affected Communities - Khelvarchauri Municipality	Acharisckali community village Acharisckali Impact-based: local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.		Informing local communities' representatives about the planned activities during the preliminary study period
	Machakhlis community villages; Sindieti and Acharis Agmarti	Impact-based : local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Informing local communities' representatives about the planned activities during the preliminary study period
Physically and economically displaced Project Affected People (PAPs)	Landowners within the project area and those living in the areas where access roads, dam structures, and powerhouses will be located	Impact-based : Will need to be compensated and /or resettled in accordance with the resettlement plans to be developed as part of the ESIA process.	Initial identification of landownership within the expected project area of impact has been undertaken
	Landowners within the project area that may be affected by the transmission line.	Impact-based : Will need to be compensated in accordance with the resettlement plans to be developed as part of the ESIA process.	by local company Geographic. No land has specifically been
	Landowners of parcels within inundated areas	Impact-based : Will need to be compensated and /or resettled in accordance with the resettlement plans to be developed as part of the ESIA process.	identified at this time as being confirmed to be effected by the project.
Employees and labour	Construction contractor workers and their trade unions (if they exists – to be determined)	Impact-based : Can benefit from employment opportunities but also face potential health and safety risks	-
	Operational workers and their trade unions (if they exists – to be determined)	Impact-based : Can benefit from employment opportunities but also face potential health and safety risks	-
Industry and Business	"Kokotauri" mineral water bottling factory	Impact based: Possible impact on the operating regime of existing HPP during construction and operation of the proposed Adjaristsqali HPP.	
	Atshesi HPP - JSC "Energo Pro Georgia"	Impact based: Possible impact on the operating regime of existing HPP during construction and operation of the proposed Adjaristsqali HPP.	-
	Machakhela HPP	Impact based: In case of project implementation the existing Machakhela HPP will no longer be able to operate and will have to be compensated.	Preliminary meeting were held with HPP owner company
International and Regional Governmental Bodies / Financial Institutions	International Finance Corporation	Interest based: Meeting the requirements of IFC's Performance Standards	Initial specific meetings held with regards to general ESIA approach, specific discussions included consultation, environmental flows, and



Stakeholder Groups	Stakeholder Bodies	Relevance to project: "impact-based" or "interest-based"	Previous Engagement
			resettlement.
National Government Departments	Ministry of Energy and Natural Resources of Georgia	Interest based: Meeting the requirements of country's energetic policy during the implementation of the planned activities	Several meetings conducted with heads of ministries and departments
	Ministry of Environment Protection of Georgia	Interest based: Meeting the requirements of Environmental Law of Georgia and International Environmental standards during the implementation of the planned activities	-
Provincial/Local Government Departments	Ministry of Finance and Economy of Autonomous Republic of Adjara	Interest based: Coordination of the financial and economic issues related to the project implementation.	Preliminary meetings with heads of the Ministry
	Directorate for environment and natural resources of Adjara Autonomous Republic	Interest based: Meeting the requirements of Environmental Law of Georgia and International Environmental standards during the implementation of the planned activities.	Informational Meeting
	Administration of Khulo municipality	Impact based: Property tax revenue to be received by municipality from the project may substantially increase annual budgets. Expectations for improvement of socio-economic conditions of the municipality. The possible negative environmental and social impact on the municipality.	Preliminary meetings were held with heads and staff of the municipality and administration
	Administration of Shuakhevi municipality	Impact based: Property tax revenue to be received by municipality from the project may substantially increase annual budgets. Expectations for improvement of socio-economic conditions of the municipality. The possible negative environmental and social impact on the municipality.	Preliminary meetings were held with heads and staff of the municipality and administration
	Administration of Qeda municipality	Impact based: Property tax revenue to be received by municipality from the project may substantially increase annual budgets. Expectations for improvement of socio-economic conditions of the municipality. The possible negative environmental and social impact on the municipality.	Preliminary meetings were held with heads and staff of the municipality and administration
	Administration of Khelvachauri municipality	Impact based: Property tax revenue to be received by municipality from the project may substantially increase annual budgets. Expectations for improvement of socio-economic conditions of the municipality. The possible negative environmental and social impact on the municipality.	Preliminary meetings were held with heads and staff of the municipality and administration
Civil Society, NGO's, Research Bodies	Advocacy Center	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Georgian Young Lawyers' Association office in Adjara	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Human Rights Center office of Adjara	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	International organization of Justice and Truth, Protection of Oppressed and Prisoners' rights and Welfare	Interest based : Protection of rights of residents of the local communities during the project implementation	-



Stakeholder Groups	Stakeholder Bodies	Relevance to project: "impact-based" or "interest-based"	Previous Engagement
	Union of Young Scientists "Intellect"	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Free Journalist's House	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	"Step Forward"	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Civil Society Institute, Batumi office	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Union for promotion of development and cooperation - "Progress"	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Democracy institute	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Democracy institute, office of Qeda	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Democracy Institute, office of Khulo	Interest based : Protection of rights of residents of the local communities during the project implementation	-
	Black Sea Eco-Academy	Interest based: Minimizing the possible negative impact on the natural environment during the project implementation	-
	Environmental association "Psovi"	Interest based: Minimizing the possible negative impact on the natural environment during the project implementation	-
	The wildlife protection society "Chaobi"	Interest based: Minimizing the possible negative impact on the natural environment during the project implementation	-
	Association of soil surface protection and promotion of sustainable use "Chorokhi"	Interest based: Minimizing the possible negative impact on the natural environment during the project implementation	
	"Human and Environment"	Interest based: Minimizing the possible negative impact on the natural environment during the project implementation	-
	Greens Movement of Georgia /Friends of Earth	Interest based: The Greens Movement of Georgia is an organisation aiming to protect the environment, to promote sustainable development, to discourage technocratic and utilitarian treatment of nature, to establish ecologically safe technologies and to promote solidarity and peace between people.	
		FoE Georgia also conducts practical activities such as tree planting, clean-up actions, public awareness raising projects, media, policy and legislative work and the development of ecologically safe technologies. FoE are implementing sustainable development projects with international partners.	-



Stakeholder Groups	Stakeholder Bodies	Relevance to project: "impact-based" or "interest-based"	Previous Engagement
	Association "Green Alternative"	Green Alternative was formed from the group of leading campaigners of Friends of the Earth Georgia and accordingly activities carried out by the organisation are continuation of previous work. The mission of the association is to create framework for economically viable and socially desirable alternatives to protect environment; to protect Georgia's unique biological and cultural heritage; and to advocate for social justice and public participation. Organisation pursues this mission through the public awareness raising campaigns, resistance to environmentally and socially destructive programs and project, promotion of the principles of equity and justice in society and support to local industry and community development. Association tries to increase public participation in decision-making process through the capacity-building of local NGOs and grassroots, support in know-how transfer and in developing easily replicable visible pilot projects benefiting local people.	
Press and Media	Television of Adjara	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	Coverage of signing ceremony, other footages
	Television "TV 25"	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	-
	Radio "Adjara"	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	-
	Newspaper "Adjara"	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	Coverage of signing ceremony, other articles
	Newspaper "Batumelebi"	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	-
	Newspaper "Batumuri Qronikebi"	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	-
	Newspaper "Adjara P.S."	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	-
	Newspaper "Mtianeti"	Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	-
	Newspaper "Khulo"	Interest based: Informing residents living in the Adjara region and the	



Stakeholder Groups		Stakeholder Bodies	Relevance to project: "impact-based" or "interest-based"	Previous Engagement
			project affected area about the planned activities, recording consultation activities.	
	Newspaper "Keda"		Interest based : Informing residents living in the Adjara region and the project affected area about the planned activities, recording consultation activities.	-



5. Stakeholder Engagement Activities

5.1 Overview

This section presents the programme for engaging stakeholders by describing the activities that will be undertaken throughout the ESIA process and on an on-going basis throughout the life of the project. The stakeholder engagement programme serves two key purposes:

- Disclosing appropriate information about the project and the ESIA plans / process. Disclosure of relevant project information helps stakeholders understand the risks, impacts and opportunities of the project. Consultation activities are more informed and constructive if stakeholders have accurate and timely information about the project and its impacts. Sometimes information needs to be reiterated several times or described in various manners to help people understand projects better. The information and issues that will require public disclosure so that stakeholders can fully understand the project include:
 - a. What is the project and why it is needed?
 - b. Where will the project be located?
 - c. What will the project look like / consist of?
 - d. What the timetable will be for the ESIA and land acquisition processes, construction and operation?
 - e. What effects could there be on the local environment?
 - f. What effects could there be on residents, businesses and livelihoods?
 - g. What effects could there be on human health?
- 2. Providing relevant stakeholders with the opportunity to voice their opinions, preferences and grievances. This enables participation and involvement in the planning and design process.

The various engagement and disclosure activities to be undertaken for the Project are described below.

5.2 Environmental and Social Impact Assessment (ESIA) Requirements

The ESIA, being undertaken by MML and Gamma, will identify the likely environmental and social effects associated with the proposed hydropower cascade scheme. As part of this work, the following activities relevant to public disclosure and consultation are planned to meet international and national requirements (as outlined in section 2):

- ESIA Scoping Disclosure and Consultation:
 - Scoping Report and Scoping Leaflet:
 - The stakeholders identified in Section 4 will be informed that the Scoping Report has been completed and will be available on the Project website;
 - The Scoping document will be made available in full on the projects website in English and Scoping leaflet in Georgian; and
 - Copies of the Georgian scoping leaflet will be made available at each of the municipalities within the project area and made available for review and comment prior to stakeholder workshops.



- Scoping consultation events: it will be important to present the scoping phase findings and the proposed ESIA approach and focus before commencing the detailed study, this is a large project with potential positive and negative impacts for several communities both indirectly and directly. The project will result in some land acquisition and there is the potential for some resettlement to occur. Public perception needs to be managed from the outset of the ESIA process and the outcomes of the following events should be used to finalise the scoping document:
 - Formal Scoping Consultation Event: four consultation events will be held, one in each of the four municipalities over a period of two days, which will be conducted in Georgian;
 - Community Scoping Consultation Event: in addition to meetings at the local municipalities, members of the ESIA team will also visit villages within the municipalities within those two days to ensure disclosure of the project to a wider audience.
 - The consultation events will be publicised in the local newspapers, as well as by contacting village community leaders, and through display of posters in the area, this will be publicised locally by CEI through local media and municipality one week before the event to invite people to attend;
 - At the event the Scoping report findings will be presented in a non-technical way in Georgian with all stakeholders invited and encouraged to ask questions and comment.
 - NGO consultation: Copies of the scoping document will be sent together with a letter of introduction to Green Alternative and Green Movement to foster early participation during the project planning phase. It is proposed to have an initial meeting with these groups in early September.
- Draft ESIA Disclosure and Consultation:
 - Notification of project and ESIA disclosure in relevant regional and national newspapers a minimum of one week before the ESIA is published
 - Submission of draft ESIA, Technical Summary, and Report on "maximum permissible levels of pollutants discharged into the surface water bodies together with effluents" to Ministry of Environment as required by Georgian law.
 - Publication of draft ESIA non technical summary in English and Georgian for a minimum of 50 days
 - At least four public consultation workshops in administrative centres of municipalities within the project area held to discuss the project and the draft ESIA report, providing an opportunity for stakeholders to comment on the report before it is finalised.

ESIA consultation activities will be fed back to the ESIA technical specialists and reported in the ESIA report. MML and Gamma will produce these documents in Georgian and English. The non-technical summary will be provided in Georgian, for distribution to stakeholders in hard copy and published in full on the project website.

5.3 Private Meetings and Workshops

Private workshops and meetings are more targeted ways in which to engage with stakeholders. They permit more in-depth discussions about project plans and allow the opportunity to go into more detail about technical aspects of the project or addressed specific concerns raised by one or a group of stakeholders. These meetings or workshops are likely to involve interest-based stakeholders who have most influence over the project such as government regulatory bodies and NGOs.

It is proposed to have an early meeting in September 2011 with Green Movement and Green Alternative who are particularly active NGOs who have been involved in other hydropower projects in Georgia.



Regular workshops will be a constructive way in which to involve key stakeholders throughout the duration of the ESIA, construction and operation periods so that issues and any grievances can be raised and addressed as they emerge.

Private meetings with individual stakeholders will also be organised as the need arises to inform the ESIA process and to discuss specific project elements or concerns.

5.4 Focus Groups

In-depth engagement with vulnerable or marginalised community groups will require less formal methods of engagement to disclose information, gather ESIA data and register community concerns. Project plans and timescales will need to be explained in non-technical language and in Georgian; communication should also be verbal to overcome any issues with illiteracy. This type of engagement is best delivered in locations which are familiar to local communities. Familiar surroundings are more conducive to productive and interactive consultation for the following reasons:

- It lends transparency to the process: community members can witness the process and stay informed about what is being discussed on their behalf, and what has been agreed at the close of consultation or negotiations.
- It increases accountability of local leaders: community members will know what they are entitled to demand, and they will be able to monitor its delivery and avoid corruption.
- It sends the message that CEI values the input of communities enough to travel there and spend time there.
- It contributes to community members' empowerment and feeling of ownership over the engagement process: community members say that the opportunity to have input into the public meetings gives them a sense of having a role in the outcome of decisions.
- Finally, it allows community members to identify their own representatives, preventing illegitimate representation from claiming that they speak for communities.

The requirement for engagement through focus groups will be determined throughout the ESIA process. Initial scoping workshops will aim to reach out to individual village communities in order to maximise the number of people who will have the opportunity to hear and share their views on the project.

5.5 Media Communications and Disclosure of Written Information

In accordance with national regulations, the project will be advertised in regional newspapers and national newspaper one week prior to publication of the draft ESIA. The advertisement must contain information related to the title, location, place, and timescales of the proposed project activities.

Copies of the draft ESIA report (both in printed and electronic format) will be provided to the relevant administrative bodies, including municipalities of Khulo, Shuakhevi, Keda, and Khelvachauri, non technical summaries will be made available in Georgian. The draft ESIA Report will also be disclosed on CEI's project specific website <u>www.adjaristsqali.com</u>, as well as IFC's website for a period of 60 days to enable stakeholders to submit comments before the report is finalised.

CEI will regularly updated the project website, highlighting progress, minutes of meetings that have taken place, the latest grievances that have been raised and other issues as appropriate. This site should be functional throughout the duration of the feasibility, scoping and construction periods and for at least the first years of operation.

Press releases will also be issued as and when necessary. For example at key stages of the project such as at issuance of permits, the completion of construction and just before the scheme is about to become operational.



The permit application/issuance procedure, including ESIA coordination and establishment of the timeframes for information disclosure and discussion under Georgian Law, includes the following steps:

- 1. Within one week of publishing the information in the newspaper, the developer must submit an EIA report (both as a paper copy and in electronic format) to the administrative bodies. Within 45 days after publishing the information, the developer has to review comments obtained from the public. Not earlier than within 50 days and not later than 60 days after publishing the information, the developer must organize the public consultation process. At least one meeting must be conducted in the administrative centre of the area where the activity is planned. The developer is required to provide minutes signed by the relevant authorities present at the meeting within five days.
- 2. All comments received are to be reviewed and where possible considered in the final version of the EIA report. Where it is not possible to address comments within the Final EIA, the developer must explain the reasons for that in writing to the author(s) of the comments. These letters, together with the minutes of the meeting and the final EIA report, are then submitted to the Ministry of Environment Protection and Natural Resources (MoE) (or in case when a Construction Permit is required, to the relevant competent authority) for consideration.

5.6 Community Liaison

CEI has designated a Community Liaison Officer (CLO) who will be responsible for day to day community engagement during the initial project development phase.¹ This individual will be suitably qualified and tasked to:

- Act as main point of contact for the local community e.g. local group leaders (for instance there are women's groups, youth groups, village elders, religious leaders) and the elected and appointed local authorities.
- Disclosure of Project employment opportunities and key project news and impact information, such as the commencement/completion of construction activities.
- Community consultation and disclosure events at key stages in the project, for example at the beginning of construction.
- Organise local community meetings to provide a regular opportunity to discuss any issues or concerns.
- Receive and record written and oral comments.
- Receive and log stakeholder grievances according to the grievance mechanism detailed below (see section 7 for the definition of a grievance and the resolution procedure).
- Dissemination of comments / meeting minutes to appropriate stakeholders.
- Produce annual summaries that provide details related to community investment activities and the use of the grievance mechanism.

CEI will also include clauses in the construction contracts to ensure that construction contractors and other sub-contractors appoint their own CLO's, who will report to CEI's CLO.

5.7 Open Days

It is recommended that, at least for the first four years of operation, an annual open day is organised to provide all stakeholders with the opportunity to see the facilities functioning up close to improve local understanding of the technology.

¹ This is not a stand alone role rather CLO duties are assigned to an existing member of staff. For the purpose of this document this member of staff is called the CLO.



5.8 Livelihood Restoration Plan

Physically and/or economically displaced people will be the most directly affected stakeholders and it is important that they are effectively engaged and that this engagement is planned well in order to avoid encroachment (see section 5.5) and to accurately assess impacts and determine entitlements and costs. Resettlement consultation will be planned and documented separately in a Livelihood Restoration Plan / Framework Policy, to be produced for the Project as part of the ESIA process.

5.9 Updating the SEP

The SEP will need to be reviewed throughout the course of the ESIA process and construction phases. Once the Project is operational this should happen at least annually by the CLO in order to assess whether:

- The type of consultation and disclosure activities are appropriate for the different stakeholder audiences;
- The frequency of consultation activities is sufficient;
- Grievances have been adequately dealt with; and
- The stakeholder list remains appropriate and whether engagement should cease or be extended to any stakeholders.



6. Implementation Timescales and Responsibilities

6.1 Overview

It is important that consultation and disclosure undertaken as part of the project occurs at appropriate timescales to allow stakeholders to be informed and contribute to the appropriate management of environment and the development of the project. This section assigns timescales and responsibilities to the activities identified in the previous section.

6.2 Implementation

The activities described in section 5 are presented in Table 6.1 below regarding when they will be implemented and the various responsibilities. This is a live document and will be updated as the Project progress with further details on specific timings of certain activities.

Activity	Timing	Responsibility
ESIA Phase Engagement	t	
ESIA Scoping Consultation and	19 th -20 th July 2011	Material in English and Georgian by MML and Gamma
Disclosure Activities		Events arranged by CEI with support of Gamma
Draft ESIA Disclosure on	March 2012	CEI and IFC
CEI/IFC website		Georgian version available in hard copies at the four municipalities affected by the project
Draft ESIA public consultation meetings	April 2012	Draft in English with summary in Georgian by MML and Gamma
		Final document in English and Georgian
		Event arranged and advertised by CEI with support of Gamma
Private meetings and	Early September with NGO's Green	MML and Gamma
workshops	Alternative and Green Movement.	CEI
	As necessary over the duration of the ESIA process to collect data and register /concerns opinions. In particular NGO's, decision makers, local authorities, residents of settlements within the project impact zone.	
Focus groups	At least one meeting with:	MML
discussions with vulnerable groups	 Village representatives and wider 	CEI Community Liaison Officer
vullierable groups	municipality heads	
	 Effected landowners 	
	 Women's group 	
Media communications	 Newspaper (regional and national 	CEI
	coverage) notice for two successive	
	weeks prior to public consultation	
	meetings	
	 Hadio (with nationwide coverage) 	
	announcement once a week for at least	
	two weeks prior to public consultation	

Table 6.1: Stakeholder Engagement Implementation Timescales and Responsibilities



Activity	Timing	Responsibility
	meetings	
	 As requested of when press releases doomod relevant 	
Construction Phase Eng		
Ongoing Community liaison and grievance logging	 CLO Appointment immediately in time for consultation and disclosure activities concerning the final ESIA report Day to day interactions Visiting local communities for informal percent time areas a weak at minimum 	CEI Community Liaison Officer and Construction Contractors' Community Liaison Officers Project manager
	consultation once a week at minimum	
Community consultation events	 Weekly grievance reporting Prior to the start of construction Prior to the completion of construction Broject website to be regularly undated 	CEI Community Liaison Officer and Construction Contractors' Community Liaison Officers
Media notifications of	 Prior to the start of construction 	CEI Community Liaison Officer
project progress	Prior to the completion of construction	
P - J P	Project website to be regularly updated	
Updating SEP	 Prior to the start of construction Prior to the completion of construction Uploaded to Project website 	CEI Community Liaison Officer
Operation and Decommi	ssioning Phase Engagement	
Open days	Annually	Operational Community Liaison Officer and Project Manager
Grievance logging, resolution and reporting	Ongoing logging and resolutionBi-annual reporting	Operational Community Liaison Officer, Project Manager
Decommissioning consultation event with affected staff and communities	 With staff prior to retrenchment proceedings With communities prior to ceasing operations 	Operational Community Liaison Officer, Project Manager
Updating SEP	Annually	Operational Community Liaison Officer, Project Manager

6.3 **Responsibilities**

Specific documents related to the ESIA (as detailed in Table 6.1) will be provided by MML and Gamma.

Gamma will be responsible for organising translation of documents into Georgian and ensuring they are distributed to the appropriate stakeholders. In compliance with national legislation, Gamma will also be responsible for development of a number of other documents required for obtaining the relevant environmental permit from the Ministry of Environment (MoE) of Georgia. The package of the documents to be developed and submitted to the MoE for consideration along with the ESIA report must include; technical summary of the project, report on maximum allowable concentration of pollutants discharged into the surface water body together with effluents.

During construction and operation activities CEI and their contractors' CLOs will be responsible for meeting with stakeholders and implementing the grievance mechanism. The CLO will document interactions with all stakeholders and be responsible for logging grievances and working with CEI's Project Manager to resolve them in a timely manner, as explained in the next section.



Figure 6.1: Allocation of Responsibilities



Source: Gamma/MML



7. Grievance Mechanism

7.1 Overview

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

The sections below consider types of grievances, confidentiality and anonymity, and the project's grievance resolution process.

7.2 Type of Grievances

Potential impacts and effects that are most likely to give rise to grievances for this Project are related to:

- Mishandling of the land acquisition process (pre-construction);
- Noise and dust from construction works (construction);
- Damage to private and common assets and properties
- Presence, and potential disruption, of a construction labour force and the effects on neighbouring villages, local services and infrastructure (construction);
- Community health and safety, for instance in relation to impacts of increased traffic (construction);
- Reduced availability of water for irrigation and watermills;
- Practices that endanger the health, safety and security of employees and/or residents; and
- Failure to meet the labour rights of employees working on the Project

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

- Negative impacts on a person or a community (e.g. financial loss, physical harm, nuisance);
- Dangers to health and safety or the environment;
- Failure of CEI, its constractors and sub-contractors and their workers or drivers to comply with standards or legal obligations;
- Harassment of any nature;
- Criminal activity;
- Improper conduct or unethical behaviour;
- Financial malpractice or impropriety or fraud; and
- Attempts to conceal any of the above.

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



7.3 Confidentiality and Anonymity

The Project will aim to protect a person's confidentiality when requested and will guarantee anonymity in annual reporting. Individuals will be asked permission to disclose their identity. Investigations will be undertaken in a manner that is respectful of the aggrieved party and the principle of confidentiality. The aggrieved party will need to recognise that there may be situations when disclosure of identity is required and the Project will identify these situations to see whether the aggrieved party wishes to continue with the investigation and resolution activities.

7.4 Grievance Reporting and Resolution

A formal logging system will be developed and the CLO will be responsible for logging all grievances. A comments sheet will be produced for those wanting to make a complaint or comment. Provision will be made to do this directly to Clean Energy Invest or contractor; through the CLO or through a community representative (e.g. through the community leaders). The procedure for lodging grievance and their resolution will be included in appropriate project communication materials such as the non-technical summaries. In the first instance, grievances will be directed to the CLO who will classify grievance according to Table 7.1

Grievance Classification	Risk Level	Validity	Response
Low	No or low	Unsubstantiated	CLO will conduct investigation, document findings and provide a response
Medium	Possible risk and likely a one off event	Possible substantiation	CLO and an appropriate investigation team will conduct investigation. The Site Manager or OHS Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response.
High	Probable risk and could reoccur	Probable substantiation	CLO will get the contractor to organise a Major Investigation Team including the CEI for prompt investigation and resolution. Work will be stopped in the affected area. The CLO will provide a response.

Table 7.1: Grievance Classification Criteria

The CLO will log the receipt of a comment, formally acknowledge it, track progress on its investigation and resolution, and respond in writing with feedback to the aggrieved party. They will initiate the investigation and ensure its speedy conclusion aiming to provide a response within **ten working days**, unless there are exceptional circumstances. If the Project receives a large number of unsubstantiated grievances, the process will be reviewed to define instances when no response is needed.

Where investigations are required, project staff and outside authorities as appropriate, will assist with the process. The CLO will collaborate with the CEI to identify an appropriate investigation team with the correct skills to review the issue raised and to decide whether it is Project related or whether it is more appropriately addressed by a relevant authority outside the Project.

The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities. In some cases it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions.



The CLO will summarise grievances to report on project performance weekly during construction and bi-annually during operation removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity.





Source: Gamma/MML

During the planning phase of the project CEI has nominated Nino Diasamidze as the CLO point of contact for grievances and comments. As the project progress CEI may nominate additional CLO's to act as points of contact within relevant municipalities.

Grievances and comments should be sent to the address below, where possible by using the form provided in Appendix A.

Name: Nino Diasamidze

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

Tel: +995 (8) 99715125

E-mail: info@adjaristsqali.com

Website : www.adjaristsqali.com



8. Monitoring and reporting

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

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

Reporting schedules are presented in Section 6.

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

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



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Appendix A. Initial project disclosure attendee list

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



Appendix B. Public Grievance Leaflet

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

What kind of grievance can I lodge?

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

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

How can I submit a grievance?

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

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

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

How will CEI deal with my grievance?

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

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

- From 5 to 10 business days for a request for information depending on the issue
- Immediately acknowledge and record a verbal complaint and within 5 to 10 business days for a written complaint.

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

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

Step 3 Resolution: once your grievance has been investigated you will be contacted with the findings and CEI's proposed response. If the investigations find that the grievance does not relate to the



projects activities or that CEI is working within the relevant Georgian and international standards in relation to grievance we will explain this in writing to you.

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

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



Public Grievance form						
Grievance reference N	umber (to be filled by CE	EI):				
Contact Details	Name:					
	Address:					
	Telephone:					
	Email:					
Please state whether y	ou wish for your details	to remain confidential:				
[Note that we may nee party without your per	d to contact you regardi mission.]	ng your grievance but wi	ll not share your details w	ith a third		
How would you prefer	By Post	By Phone	By E-mail			
To be contacted?						
Please tick a box						
Name and identificatio	n information (from the	identity card). [this field i	s not mandatory]			
Please provide details where and how many t	of your grievance, inclu imes, as relevant.	de description of the pro	blem, who it happened to,	when,		
What is your suggeste	d resolution for the grie	vance, if you have one?				
How to submit this	By post to:					
form to CEI	Nino Diasamidze					
	6 Iraki Abashidze Str	raki Abashidze Street:				
	Batumi 6010;					
	Georgia					
	By hand:					
	Nino Diasamidze;					
	6 Iraki Abashidze Street;					
	Batumi 6010;					
	Georgia					
	by e-mail: please email your grievance, suggested resolution and preferred contact details to:					
	info@adjaristsqali.co	om				
Signature			Date			