

Georgian State Electrosystem



# STAKEHOLDER ENGAGEMENT PLAN

for

Enhancing Energy Security  
through Power Interconnection and  
Renewable Energy Program  
(P179950)

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## Acronyms

<b>Acronym</b>	<b>Description</b>
AH	Affected Household
CLO	Community Liaison Officer
E&S	Environmental & Social
EMF	Electro-Magnetic Field
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standard
GRC	Grievance Resolution Committee
GRM	Grievance Redress Mechanism
GSE	Georgian State Electrosystem
IDP	Internally Displaced People
KV	Kilovolt
NGO	Non-Governmental Organization
OHL	Overhead Transmission Line
OIP	Other Interested Parties
PAP	Project-Affected Parties
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
WB	World Bank

# 1 Introduction / Project Description

## 1.1 Introduction

This Stakeholder Engagement Plan (SEP) which has been prepared and will be implemented by JSC Georgian State Electrosystem (GSE), in preparation for the Enhancing Energy Security Through Power Interconnection And Renewable Energy Program (P179950). The Georgian transmission network operator - Georgian State Electrosystem (GSE) –has a robust ten-year network development plan for 2023-2033 (TYNDP 2023-2033) aimed at further improving the reliability of electricity supply in the country and improvement of regional connectivity of the Georgian power system. One of the projects is the electric and digital interconnection between Georgia and Romania (GE-RO Interconnection Project). The project will be executed in three distinct phases.

Phase 1: Preparatory technical assistance financing Component

- A. Geophysical and geotechnical investigations of the Black Sea seabed Component
- B. Legal and financial advisory and technical assistance

Phase 2: On-land transmission grid strengthening

Phase 3: Undersea cable and converter station financing

The present SEP primarily concentrates on phase one and will undergo periodic updates to encompass subsequent phases.

This Interconnection Project would create significant economic benefits for Southern Caucasus (SC) countries and Romania. In particular, the electric cable would allow SC countries to benefit from expanded export opportunities to Romania and broader South-Eastern Europe (SEE) taking into account hourly energy market prices and importing electricity during winter at competitive rates thus reducing dependency on existing expensive imports and thermal generation.

The Interconnection Project would also contribute to integration of larger solar photovoltaic (PV) and wind capacity in Romania considering the new European Green Deal by allowing to provide competitively priced reserves for those intermittent sources of electricity. The Interconnection Project would also allow Armenia to export renewable energy (RE) based electricity coming from hydro and increasingly solar PV considering ambitious ongoing program for scaling up solar PV.

An optic fiber cable (OFC) would enable to increase broadband data traffic and help reduce the prices for Georgia and overall SC as well as generate revenues from transit traffic to Middle East, Central Asia, and South Asia. This would also contribute to further development of the information technology (IT) industry considering progress made in some of the countries where IT industry has been expanding very rapidly during last ten years. Due to the unique scale of the Project, the OFC might be deployed as a part of a hybrid power-telecom cable or a parallel cable, depending on the technical and economic feasibility.

## 1.2 Project Overview

### 1.2.1 Type of project and location

The Program in its Phase 1 will finance the geophysical and geotechnical investigations of the Black Seabed towards optimizing the routing of the cable, the preparatory studies for the connection to the domestic high-voltage grid, as well as related preparatory technical assistance including the preparation of the Environmental and Social (E&S) documents, and the legal and commercial advisory.

Phase 2 would finance investments required to strengthen the Georgian high-voltage electricity transmission network to interconnect and transmit power through the undersea cable. The expected connection points with Georgia's transmission network would be the Jvari and Tskaltubo substations, but the exact routing of the OHL is still under consideration.

### 1.2.2 Summary of potential environmental and social (E&S) impacts

The assessment revealed mainly non-significant impacts. The works of the Phase 1 of the Program will might have insignificant effect on local ports, fisheries, aquaculture industry, coastal communities and residents as well as tourism industry.

Potential impacts:

- Potential impacts on Legally Protected Areas and Important Areas for Biodiversity.
- Potential impact on infrastructures, transport and mobility. The positive impact on the economy due to the labor and goods requirements.
- In terms of negative impacts, the Project can lead to occupational health and safety (OHS) risks for the workers involved, specifically for vessel crew.
- Potential impact on oceanography and seawater quality due to the emission of chemical compounds (mainly by the vessel engines and propellers) and waste production is, in fact, expected from all the vessels mobilized for the project.
- Temporary deterioration of air quality and impact on climate due to the dust release from combustion of diesel engines during vessels mobilization, emission of gaseous atmospheric pollutants (SO<sub>2</sub> and NO<sub>X</sub>) and greenhouse gases (CO<sub>2</sub>, CH<sub>4</sub>, O<sub>3</sub> and N<sub>2</sub>O)
- A temporary and limited increase in marine acoustic.
- Potential impact on Sediments and Seafloor morphology due to cable laying and electrodes installation activities.
- The impact generated on Legally Protected Areas and Important Areas for Biodiversity is expected to be non-significant (negligible to low).

### 1.3 Purpose and objectives of SEP

The purpose of the present SEP is to explain how stakeholder engagement will be practiced throughout the course of the Program, particularly its Phase 1, and which methods will be used as part of the process; as well as to outline the responsibilities of GSE and contractors in the implementation of stakeholder engagement activities.

In line with World Bank's Environmental and Social Framework (ESF), the broader objectives of the information disclosure and stakeholder engagement activities presented in SEP is to:

- Establish a systematic approach to stakeholder engagement and build a constructive relationship with them, in particular with project-affected parties;
- Identify the stakeholders, including local, international, governmental and non-governmental actors;
- Assess the level of stakeholder interest and support for the project and enable stakeholders' views to be taken into account in project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project cycle on issues that could potentially affect them;
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

The involvement of the local population is essential to the success of the project, to ensure smooth collaboration between project staff and local communities and minimize and mitigate environmental and social risks related to the project.

## 2 Legal Framework and IFI Regulations and requirements

### 2.1 General Overview

The legal and policy framework of the project is based on national legislation and World Bank ESS requirements. Project-related LAR principles will be developed based on the requirements of applicable legal norms and policy analysis.

### 2.2 Georgian and International Marine Time Legislation and Regulations

In Georgia, the legislative acts given below regulate are relevant for the purposes of the program:

- Civil Procedure Code of Georgia.
- General Administrative Code of Georgia.
- Administrative Procedural Code of Georgia;
- Constitution of Georgia;
- Civil Code of Georgia;
- Law of Georgia on the State Property;
- Law of Georgia on the Public Register;
- Tax Code of Georgia;
- Law of Georgia on the Entrepreneurship

In addition, the contractors working on seabed study will Contractor to consistently adhere to the international rules and standards for the safety of navigation established by the International Maritime Organization of the UN and laid out in the International Convention for the Safety of Life at Sea (SOLAS), 1974; the Convention on the International Regulations for Preventing Collisions at Sea (COLREG), 1972; and the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978. Code of Maritime Labor Convention adopted in 2006 will also be applied for the water area and vessels.

### 2.3 Lenders' Policies

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

**The process of stakeholder engagement will involve the following, as set out in further detail in this ESS:**

- (i) stakeholder identification and analysis;
- (ii) planning how the engagement with stakeholders will take place;
- (iii) disclosure of information;
- (iv) consultation with stakeholders;
- (v) addressing and responding to grievances; and
- (vi) reporting to stakeholders.

The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

An SEP proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99).

According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

## 2.4 Comparison of Georgian Legislation and WB ESS

In Georgia, entitlements for payment for the exchange of land are based on registration of ownership. However, under the Lenders’ involuntary resettlement policies, affected persons are entitled to some form of compensation whether or not they own a registered land title, if they occupy or use the land prior to the cut-off date. The focus of the Lenders’ policies is to mitigate the adverse impacts of poverty, where any adverse impacts occurring are directly or indirectly attributable to activities funded by the project. In cases where affected person has no ownership or tenure rights according to Georgian law due to lack of registration, the provisions of the Lenders’ requirements will be applied in terms of their rights for compensation, consultation, and grievance mechanisms. Where there is a difference between the compensation requirements of the laws of Georgia and Lenders’ requirements, the more beneficial to the affected people, will be employed in order for the Lenders to support and fund the project.

Table below provides an analysis of the differences between Georgian Laws and Lenders' requirements.

*Table 2-1 Comparison of Georgian laws/norms and Lender's policy*

<b>Issue</b>	<b>Georgia laws and regulations</b>	<b>WB land acquisition, involuntary resettlement and livelihood restoration requirements</b>	<b>Measures taken by the GSE to Bridge Gaps Between Georgian law and Lenders' requirements</b>
Complaints and grievances	The Georgian legislation does not necessitate setting up a grievance mechanism for the affected people and businesses.	There must be an independent objective appeal mechanism that is open to the public and reported openly. The Project owner should establish a grievance mechanism as early as possible in the process to receive/ address in a timely manner	The GSE had established a transparent and accessible grievance mechanism to use throughout the projects implementation
Consultation with PAP	No requirement for consultation with affected parties.	All affected and impacted people must be consulted prior to agreements. Compensation must be agreed prior to handover of assets and prior to civil works commencing in affected area.	All affected people will be consulted prior to signing the agreements. Compensation will be agreed prior to handover of assets and prior to civil works commencing in affected area.

To reconcile the gaps between Georgia laws/regulations and WB Policy, GSE will prepare the Resettlement Policy Framework and this RAP, for the Project, ensuring compensation and the rehabilitation of informal settlers, and the provision of allowances for the project affected households to be relocated, suffer business losses, or those severely affected.



### 3 Prior consultations

GSE has been actively collaborating with a diverse array of both national and international project stakeholders. As of now, the engagement efforts have predominantly centered around state-level project stakeholders (see table 4.2). In April 2023, GSE visited potential site visit areas near Anaklia settlement, Zugdidi municipality. The site visit included meetings with representatives of various state agencies as well as representatives of different departments within the GSE. The participants included the Ministry of Economy and Sustainable Development (MoESD), Anaklia Deep Sea Port Development Agency, National Agency for Protected Agency, and Zugdidi local government. This site visit with multiple stakeholders was important in terms of further defining the scope of the Project and particularly the components of Phase 1. In addition, the projects department of GSE has continuous consultations with other stakeholders, such as the Ministry of Regional Development and Infrastructure (MRDI), Georgian National Energy and Water Supply Regulation Commission, National Environmental Agency (NEA) and Maritime Transport Agency of Georgia. In October 2023, subsequent consultations with the Anaklia Deep Sea Port Development Agency and other relevant state entities resulted in possible further changes for the route of the undersea cable in Phase 2.

Subsequent to this meeting, a site visit to the project areas was arranged at the outset of April. This visit saw the participation of representatives of various state agencies as well as representatives of different departments within the GSE. The field visit yielded valuable insights, resulting in modifications and clarifications to several routes and locations.

### 4 Stakeholder Engagement Program

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. Given the inherently sensitive and cross-border character of the project, the extensive public relations campaigns and communication strategies will be developed at the state level.

#### 4.1 Lessons learned from previous projects

Several key lessons were learned from the previous experience of the Batumi-Akhaltshikhe Transmission Line project, funded by the World Bank under the Transmission Grid Strengthening Project (TGSP). During the implementation of the project, it became apparent that most of the population had concerns about the impacts of the Electro Magnetic Field (EMF). GSE provides leaflets with information on the project, project impact and the project grievance mechanism. However, the leaflets did not reach most of the affected households. Consequently, GSE prepared more targeted communication materials, including video clips and a PowerPoint presentation, to provide explanations on the impact of the EMF and safety rules. Furthermore, the project grievance mechanism under the ongoing project was ad hoc and informal. It did not allow the systematic tracking and monitoring of grievances. Today GSE has a comprehensive GRM.<sup>1</sup> Lessons learned from past projects have emphasized the early implementation of information campaigns as crucial. This step is essential for providing affected communities with credible and realistic information, preventing the inflation of their expectations. The setting up of information centers will further ensure the active participation of these communities in the consultation process and the effective execution of planned measures. Even while Phase 1 doesn't concern the construction of the transmission line and subsequent EMF risks, early awareness-raising campaign will help the overall implementation of the Program.

#### 4.2 Stakeholder Identification and Analysis

Stakeholder consultation and information from the early stages of a project is recommended and can help prevent conflicts with stakeholders at later stage. It can also contribute to avoidance and

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<sup>1</sup> <https://www.gse.com.ge/projects/Grievance-Redress-Mechanism>

improved mitigation of social and environmental impacts.

Already during the comparison of alternative routing alignments (or generally project alternative comparison) preliminary stakeholder consultations are recommended in order to understand PAs perspectives on Environmental and Social impacts and adjust project planning to minimize trade-offs and select the option that is also taking people's preferences into account. In project planning the preparation of environmental studies is done in the design phase. RAP preparation is usually done after the detailed design is available (at least for OHL projects) and followed by RAP implementation, to be completed before start of construction. These two phases, 1. Environmental Studies and 2. RAP study and RAP implementation have a high degree of stakeholder information and consultation requirements.

The term "Other interested parties" (OIPs) refers to "individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups" (World Bank, 2018b). GSE is already actively coordinates with other interested parties, such as the Ministry of Economy and Sustainable Development, Ministry of Finance, Ministry of Regional Development and Infrastructure, Ministry of Environmental Protection and Agriculture, National Agency of Public Registry, Agency for Protected Areas, Georgian National Energy and Water Supply Regulatory Commission, Communication Commission, State Hydrographic Service of Georgia, Anaklia Deep Sea Port Development Agency, Operational Technical Agency of Georgia, Maritime Transport Agency of Georgia, civil society organizations.

**The present SEP is subject for revision and update. Given the cross-border nature of the project, stakeholders of the other pertinent countries namely Romania, Turkey, Azerbaijan, Hungary, and Bulgaria will be identified during the forthcoming stages of the project.**

### 4.3 Project-affected parties

During the initial phase of the project, it is expected that there will be various impacts on the local environment and communities, but the effects of the technical studies are expected to be minimal. The potential effects maybe inflicted by:

- Local ports - the seabed study might affect local ports by potentially altering navigation routes or requiring adjustments to shipping lanes to accommodate the research vessels. This could lead to temporary disruptions in port activities and shipping operations.
- Fisheries and aquaculture industry – technical studies could impact the fisheries and aquaculture industry by potentially disrupting fishing grounds and aquaculture activities. This could affect the livelihoods of those dependent on these industries, such as fishermen and aquaculture farmers.
- Coastal communities and residents - the project might cause disturbances to the daily lives of coastal communities and residents. Increased noise levels, temporary changes in water quality, or alterations to the coastal landscape could affect the well-being and livelihoods of those living in the vicinity of the study area.

The table below summarizes the key categories of Project-affected parties and the respective justification for their interest in the project.

**Table 4-1 Project affected parties**

Potential project affected parties in Phase 1	Potential impact
<ul style="list-style-type: none"> <li>Local ports</li> <li>Fisheries and aquaculture industry</li> <li>Coastal communities and residents</li> </ul>	<ul style="list-style-type: none"> <li>The seabed study might affect local ports by potentially altering navigation routes or requiring adjustments to shipping lanes to accommodate the research vessels. This could lead to temporary disruptions in port activities and shipping operations. Specific involvement in some project-related mitigation measures.</li> <li>Technical studies could impact the fisheries and aquaculture industry by potentially disrupting fishing grounds and aquaculture activities. This could affect the livelihoods of those dependent on these industries, such as fishermen and aquaculture farmers.</li> <li>Phase 1 of the project might cause disturbances to the daily lives of coastal communities and residents. Increased noise levels, temporary changes in water quality, or alterations to the coastal landscape could affect the well-being and livelihoods of those living in the vicinity of the study area.</li> </ul>

During RAP Study, which is the subsequent phase of the project, intensive stakeholder engagement activities will be undertaken. This includes the PAP survey, census and inventory of losses, consultation and disclosure as well as consultations with administrative stakeholders as land-offices, valuers etc. The preparation of RAP is mostly done by subcontracted consultants, however GSE staff will need to supervise the RAP preparation to some extent, as GSE will then be responsible for implementation. The early land registration procedure will be one of GSE’s tasks in this phase which will involve substantial communication with PAPs and which needs to be closely coordinated with the RAP preparation. A specific focus on gender mainstreaming and vulnerable groups shall be part of the engagement, esp. in RAP study in order to identify impacts on vulnerable people who would need specific help with formalities in terms of land registration or who may have specific livelihood restoration requirements.

This can facilitate the task of CLOs, who are responsible for RAP implementation. In the past, CLOs have accomplished this complicated task with a lot of commitment (helping affected persons especially old aged and sometimes illiterate persons with all formalities regarding land registration procedures).

### 4.3.1 Municipality and village representatives

A third category of important parties will be municipality and village representatives. The self-governing unit is the executive branch of self-government headed by Representative of Mayor. Sakrebulo is the representative branch of self-government at municipal and village level.

### 4.3.2 Other interested parties (OIPs)

The table below summarizes the key categories of OIPs and the respective justification for their interest in the project.

**Table 4-2 Other interested parties – external**

Other interested parties	Interest in the project
Ministries and Government agencies <ul style="list-style-type: none"> <li>Ministry of Economy and Sustainable Development (formerly Ministry of Economy), Ministry of Finance, Ministry of Regional Development and Infrastructure</li> </ul>	Overall: To ensure project compliance with Georgian legislation (e.g. energy policies, environmental performance) <ul style="list-style-type: none"> <li>Promote economic development</li> <li>Specific involvement in some project-related mitigation measures</li> </ul>

Other interested parties	Interest in the project
<ul style="list-style-type: none"> <li>• Ministry of Environmental Protection and Agriculture</li> <li>• Agency of Protected Areas</li> <li>• Communication Commission</li> <li>• The Coast Guard of the Ministry of Internal Affairs</li> <li>• Anaklia Deep Sea Port Development Agency</li> <li>• Maritime Transport Agency of Georgia</li> <li>• Agency of Protected Areas</li> <li>• National Environmental Agency</li> </ul>	<ul style="list-style-type: none"> <li>• Engage with the public and disclose the Local Georgian EIA Scoping Report, EIA Report and Environmental Decision at the end of the Phase 1 of the Project</li> <li>• Responsible for the protected areas and proposed protected areas that are or will be created in the vicinity of the Project, particularly in context of the Kolkheti National Park and the marine protected area</li> <li>• To identify the precise placement and exit points of the new Internet cable, to ensure that the two new cables do not disrupt each other's operation.</li> <li>• To manage any coastal and waterways issues</li> <li>• To avoid overlapping or unwanted proximity of locations intended for the two projects</li> <li>• To avoid overlapping or undesired proximity of project locations to shipping routes and waterways</li> <li>• Due to the proximity of certain components of the project to the Kolkheti National Park and crossing the marine protected area.</li> <li>• To consider the locations allocated for aquaculture and to reduce the impact of the overall project by providing inputs in Phase 1.</li> </ul>
<p><b>International Stakeholders:</b></p> <ul style="list-style-type: none"> <li>• National government of Romania, Azerbaijan, Hungary, Bulgaria, Turkey</li> <li>• EU, Other IFIs, technical consultants.</li> </ul>	
<p>Local government departments Municipalities and villages</p> <p>Zugdidi City Hall of Samegrelo-Zemo Svaneti Region</p>	<p>Protect the rights of inhabitants in the project area</p> <p>Represent the local communities/PAPs; receive and address any feedback and grievances from them</p>
<p>Non-governmental organizations (local, regional, national)</p>	<p>Ensure the environmental and social performance of the Project is protecting the environment and affected people and complies with international E&amp;S standards</p>
<p>Business and workers' organizations</p>	<p>Interest in procurement and supply chain, potential environmental and social impacts as well as community health and safety</p>
<p>Other project developers reliant on or in the vicinity of the Project (e.g., associated facilities) and their financiers (e.g., ADB, EBRD, KfW, IFC)</p>	<p>May require operation of the Project to enable the export of power</p> <p>Can help Identify interactions and cumulative impacts with other proposed developments</p>
<p>Academic institutions (e.g., universities, think tanks, schools)</p>	<p>Potential concerns regarding environmental and social impacts</p> <p>Potential educational/outreach opportunities to increase awareness and acceptance of the project</p>
<p>Press and media</p>	<p>Inform residents in the project area and the wider public about the Project implementation and planned activities</p>
<p>General public, tourists, jobseekers</p>	<p>Interest in the general socio-economic impacts of the project, both adverse and beneficial</p>

Internal interested parties with stakes in the project include GSE Staff; Supervision Consultants; Contractors; Sub- contractors; service providers, suppliers and their workers.

## 4.4 Disadvantaged / Vulnerable individuals or groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected will not be affected in Phase I, However the potential impact will be assessed in Phase II and III.

The Samegrelo region has a higher-than-average concentration of Internally Displaced People (IDPs) relocated from the adjacent breakaway Autonomous Republic of Abkhazeti. Additional disadvantaged / vulnerable individuals or groups in the project area include “those registered as poor with the local social services; women-headed households; elder-headed households ( $\geq$  pension age) without any other household member bringing in income; and households headed by the persons with disabilities” (SLR Consulting, 2018: 15).

## 4.5 Summary of stakeholder interest in and influence over the project

The table provided below summarizes the level of interest in and potential influence over the project of the various stakeholder categories identified above. Categories color-coded in red will require regular and frequent engagement, typically face-to-face and several times per year, including written and verbal information. Categories color-coded in orange will require regular engagement (e.g. every half-a-year), typically through written information. Finally, categories color-coded in green will require infrequent engagement (e.g. once a year), typically through indirect written information (e.g. mass media).

*Table 4-2 Analysis and prioritization of stakeholder groups based on level of interest in and influence over the project*

	High ability or likelihood to influence or impact the project	Medium ability or likelihood to influence or impact the project	Low ability or likelihood to influence or impact the project
High level of interest in the project	<ul style="list-style-type: none"> <li>Local ports.</li> <li>Fisheries.</li> <li>Local communities</li> <li>Local Government Departments</li> <li>Municipalities and villages</li> <li>LEPL Anaklia Deep Water Port Development Agency</li> <li>National Ministries and Government Agencies</li> </ul>		
Medium level of interest in the project	<ul style="list-style-type: none"> <li>NGOs</li> <li>Press and Media</li> </ul>	<ul style="list-style-type: none"> <li>Businesses and workers' organizations</li> </ul>	<ul style="list-style-type: none"> <li>Academic institutions</li> <li>General public, tourists, jobseekers</li> </ul>
Low level of interest in the project			<ul style="list-style-type: none"> <li>Other project developers and their financiers</li> </ul>

## 5 Stakeholder engagement program

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the Phase 1 for each group of the stakeholders. Specifics methods are explained in details in subsequent sub-sections.

*Table 5-1 Engagement methods for target stakeholders*

Target stakeholders	Topic(s) of engagement	Method(s) used
<b>Project Affected Parties</b> - Local ports, Fisheries and aquaculture industry, Coastal communities and residents	Details of the technical studies, their implementation scope, and their potential impact; information on broader Project details; Grievance mechanism process	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Mass/Social Media Communication - Facebook, webpage; Disclosure of written information - Brochures, posters, flyers, website; Information desk; Grievance mechanism
<b>Other Interested Parties (External)</b> Ministry of Economy and Sustainable Development, Ministry of Finance, Ministry of Regional Development and Infrastructure, Ministry of Environmental Protection and Agriculture, National Agency of Public Registry, Agency for Protected Areas, Georgian National Energy and Water Supply Regulatory Commission, Communication Commission, State Hydrographic Service of Georgia, Anaklia Deep Sea Port Development Agency, Operational Technical Agency of Georgia, Maritime Transport Agency of Georgia, civil society organizations	Specifics of the Project and its three phases; delineation of responsibilities; implementation of the commitments in accordance with the national legislation	Face-to-face meetings; Joint public/small group/individual meetings; project tours for media/CSOs; information desks, communication materials, website.

### 5.1 Details on engagement methods to be used

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The following presents the stakeholder engagement activities envisaged under the project.

#### 5.1.1 Public/community meetings

At the start of the project, GSE will organize project launch meeting in or nearby Anaklia settlement. From then on, Community Liaison Officer/s (CLO) will help organize community meetings/sensitization sessions in the villages on a quarterly basis throughout in Phase 1 of the project. These meetings will also be used for providing available information on Phase 2 and Phase 3.

### 5.1.2 Website

Under Phase 1 of the Program, a dedicated website will be set up for the Project to disseminate the outcomes of the Project's feasibility study and the preparatory technical study, which offer an excellent entry point for early public outreach and citizen engagement. In addition to the BSSC Project website, the Program will establish a multi-stakeholder group to foster continuous dialogue among a variety of stakeholders and support international coordination on the Project.

### 5.1.3 Mass/social media communication

A social media expert (from GSE's Public Relations Department or an external consultant) will be engaged on the Project for 6 months/year in order to post information on the dedicated project and GSE Facebook page, and to communicate with the local population via social media campaigns or tools like WhatsApp throughout the project's lifecycle. Social media channels will be used as much as possible to disseminate information as rates of social media use (especially Facebook) appear to be high across users of different age and background in project affected communities.

### 5.1.4 Communication materials

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. GSE will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance both in English and Georgian. The website will also provide information about the grievance mechanism for the project (see next sub-section).

### 5.1.5 Grievance redress mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project. Dedicated communication materials (GRM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures. GRM committees at the municipal level will benefit from training on how to receive, respond to, address and close grievances in line with best international practices. Internal GRM training will also take place for GSE and contractor staff. The GSE's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GRM committee works, both in terms of process and deadlines.

### 5.1.6 Project tours for media, local representatives

At appropriate points during the construction phase, site visits or demonstration tours will be organized for selected stakeholders from media organizations or local government. On average, it is planned that 2 such tours will be planned per year.

### 5.1.7 Information Desks

Information Desks in Zugdidi municipality will provide residents with information on stakeholder engagement activities, updates on project development, contact details of the GSE Community Liaison Officer etc. CLOs in the affected municipalities will set up these information desks, either in their offices or other easily accessible places where they can meet and share information about the project with PAPs and other stakeholders. Brochures and fliers on various project related social and environmental issues will be made available at these information desks.

### 5.1.8 Trainings, workshops

Finally, trainings on a variety of social and environmental issues will be provided to GSE and contractor staff and possibly relevant government or non-government service providers. Issues covered will include

a sensitization to gender-based violence risks.

## 5.2 Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of CLO/s will help to ensure proactive outreach to all population groups. Training and awareness raising sessions will be conducted in villages rather than municipal centers to ensure higher participation of targeted population. Focus groups dedicated specifically to vulnerable groups may also be envisaged as appropriate.

## 5.3 Information disclosure

The current GSE website (<http://www.gse.com.ge/home>) is being used to disclose project documents, including those on environmental and social performance in both Georgian and English. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the homepage of GSE's website. Details about the Project Grievance Resolution Mechanism will be posted on the website. An electronic grievance submission form will also be made available on GSE's website. Further, GSE will create a project Facebook page and a dedicated website will be set up for the Project to disseminate the outcomes of the preparatory studies, which offer an entry point for early public outreach and citizen engagement.



## 6 Roles, Responsibilities and Resources for Stakeholder Engagement

### 6.1 Implementation Arrangements

GSE will mobilize human and material resources to implement the SEP and manage the Grievance Resolution Mechanism (GRM). SEP activities will be led by GSE's E&S. A core Community Liaison Team comprised of staff from these departments will take responsibility for and lead all aspects of the stakeholder engagement. The team will be supported by part-time and full-time consultants, as needed. In addition to 3-4 staff at GSE headquarters, 1 Community Liaison Officers (CLOs) will be recruited. A communication specialist and facilitator from the Public Relations Department, will be an integral part of the Community Liaison Team. The Project Grievance Focal Point will also be part of the Community Liaison Team. Environmental and Social experts will be responsible for the environmental and social impact assessment and performance of the Project.

### 6.2 Roles and Responsibilities

A core Community Liaison Team comprised of GSE staff, the Technical Supervision Department and the Public Relations Department will take responsibility for and lead all aspects of the stakeholder engagement. However, to implement the various activities envisaged in the SEP, the Community Liaison Team will need to closely coordinate with other key stakeholders – other national and local government departments/agencies, GSE departments, the Supervision and ESIA consultants, the contractor along with sub-contractors. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

*Table 6-1 Responsibilities of key actors/stakeholders in SEP Implementation*

Actor/Stakeholder	Responsibilities
GSE (Community Liaison Team, CLOs)	<ul style="list-style-type: none"> <li>• Planning and implementation of the SEP;</li> <li>• Leading stakeholder engagement activities;</li> <li>• Management and resolution of grievances;</li> <li>• Coordination/supervision of contractors on SEP activities;</li> <li>• Monitoring of and reporting on environmental and social performance to GSE management and the World Bank</li> </ul>
Implementation Consultants	<ul style="list-style-type: none"> <li>• Supervision/monitoring of Contractor;</li> <li>• Management of engagement activities during the construction phase</li> </ul>
Contractors/sub-contractors	<ul style="list-style-type: none"> <li>• Inform GSE of any issues related to their engagement with stakeholders;</li> <li>• Prepare, disclose and implement various plans (e.g. C-ESMP, Labor Management Plan, etc.)</li> </ul>
National Government Departments - <ul style="list-style-type: none"> <li>• Ministry of Economy and Sustainable Development</li> <li>• Ministry of Environmental Protection and Agriculture,</li> <li>• Agency for Protected Areas</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor Project compliance with Georgian legislation;</li> <li>• Participate in the implementation of some activities in the ESMP/RPF and SEP;</li> <li>• Make available and engage with the public on the Scoping and EIA Reports.</li> </ul>

National Agency of Public Registry	
Affected municipalities and local communities	<ul style="list-style-type: none"> <li>• Transfer all complaints to the GSE GRM Focal Point;</li> <li>• Participate in the local Grievance Resolution Committee;</li> <li>• Make available the disclosed ESIA documents;</li> </ul>
Other Project developers	<ul style="list-style-type: none"> <li>• Engage with GSE regarding project design;</li> <li>• Share ESIA information and documentation with GSE to enable the assessment of cumulative impacts</li> </ul>

## 7 Grievance Redress Mechanism

### 7.1 Introduction

The Grievance Resolution Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner, that arise as a result of the Project, either the result of actions by GSE or the Contractor employed by GSE, from affected communities and external stakeholders. GSE is responsible for managing the GRM. GSE will administer the GRM process deciding whether they or the Contractor is responsible and determine the best course of action to redress the complaint. GSE with the support of the implementation consultant will monitor the contractor if the grievance is redressed accordingly.

Typical grievances for transmission line projects include those related to:

- Environmental impact;
- Indirect social impacts.

The two-tiered grievance resolution process involves the following main steps:

- (I) receipt of complaints;
- (II) screening for standing;
- (III) Grievance Resolution Committee (first tier) and;
- (IV) GSE Grievance Redress Commission (GRC) (second tier);
- (V) Closure of grievances; and
- (VI) Grievance records and documentation.

All grievances will be registered, reported and tracked by GSE in the Grievance Register by special person responsible for grievances redressing and logging. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to prevent similar grievances (if the local community have similar grievances such as, effect of electromagnetic field, unit rates etc. the additional public consultation meetings with relevant explanations will be conducted). The status number and trends of grievances will be discussed between GSE, the Contractor and the Implementation Consultant during E&S meetings.

#### **Grievance resolution is a two-stage process, including:**

Stage 1 – informal (oral) review of the PAP's complaint (whether written or oral). At this stage the PAP's complaint is reviewed in an informal (oral) way and the Committee make and sign the minutes on the matter. If at Stage 1 the PAP's complaint is not resolved the PAP is informed about grievance resolution procedures of Stage 2. An PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 10 days. The GRC shall gather as per necessity (but at least once a month) and shall include eight members.

Stage 2 –If PAP's complaint is not resolved at stage 1 by local committee, it will be presented to Grievance Redress Commission (GRC), GRC reviews the written complaints of PAPs, which were not satisfied at Stage 1.

Grievance redress procedure of Stage 1 is an informal tool of dispute resolution allowing PAPs and the project implementation team to resolve the disagreement without any formal procedures, procrastination and impediments. The international experience of different projects shows that such informal grievance redress mechanism helps to solve most of the complaints without formal procedures (i.e., without using the procedures specified in the Administrative Code or litigation). This mechanism enables unimpeded implementation of the Project and timely satisfaction of complaints. If the PAP is not satisfied, the grievance

redress mechanism should assist him/her in lodging an official complaint in accordance with the procedures of Stage 2 (the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a complaint, format of complaint, terms of complaint submission, etc.).

At the relevant document's preparation stage during the consultations meetings and negotiations the PAPs have to be fully informed of the grievance redress mechanism, its functions, procedures, contact persons and rules of making complaints through oral information and booklets. Care is always taken to prevent grievances rather than going through Stage 2. The achievement of this goal can be ensured through active participation of PAPs, effective consultations, proper communication and coordination among local communities, GSE and local authorities.

### **Tier 1: Grievance Resolution Committee**

A local Grievance Resolution Committee (GRC) will be established in Municipality, with an office in the municipal building. Once a grievance has been logged, the corresponding local GRC will be engaged to define a solution to solve the grievance. The composition of each GRC is described in below. Special provisions will be made for any complaints of a confidential nature.

#### **Composition of the local grievance resolution committee**

- 1) Georgian State Electrosystem (GSE) representative as a committee coordinator;
- 2) Regional/municipal representative as a committee member;
- 3) Representative of a Project Affected People (PAP) as a committee member;
- 4) Woman – representative of the Project Affected Household (PAH) as a committee member;
- 5) Representative of local non-government organization (NGO) taking into account the grievance character – as a committee member;
- 6) Local specialist of social and environmental safeguards from the Supervision Consultant – as a committee member;
- 7) Local specialist of social and environmental safeguards from the Contractor Company – as a committee member.

The GSE Head of Social Affair Division will act as secretary of the GRC (creation, coordination, and documentation). Members of the GRC will be invited by them in accordance with the types of complaints to be addressed. The meeting will be by the review of all PAP complaints received and to propose a solution to all grievances within the past one or two weeks. Then, the GRC will welcome the complainants whose complaint had been reviewed during the previous meeting to discuss the proposed solution.

For each complaint, the GRC will determine whether additional investigations are warranted. If so, the additional information will be collected before the GRC meeting with the PAP complainant and will be provided to the PAP before the meeting. The GRC will then inform the PAP about the date, time and place of its review meeting, and invite the PAP accordingly.

The GRC will receive the complainant and discuss with them a solution to their grievance. The committee shall draw up and sign the minutes of their discussion on the matter. If the complaint is satisfactorily resolved, the PAP will also sign the minutes in acknowledgement of the agreement. In cases where the project has agreed to put in place additional measures, these will be specified, with a timetable for delivery, in the minutes of the meeting.

## **Tier 2: GSE Resolution at Central Level**

If any aggrieved PAP is unsatisfied with the GRC decision, the next step will be to lodge the grievance with GSE at the central level. The GRC should assist him/her in lodging an official complaint. GSE shall then review the complaint at the grievance resolution commission. The complainant shall be informed of the decision within a maximum of 30 days.

The complainant shall be informed in writing of GSE's decision. If GSE's decision fails to satisfy the aggrieved affected persons, they can pursue further action by submitting their case to the appropriate court of law.

### **7.1.1 Closure of Grievances**

A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented to the satisfaction of the complainant, a complaint closes out form will be signed by both parties (GSE Environmental and Social Manager and the complainant), stating that the complainant considers that its complaint is closed. This form will be archived in the Project Grievance database.

In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or it is obviously speculative or fraudulent. In such situations, the Project's efforts to investigate the complaint and to arrive at a conclusion will be well documented and the complainant advised of the situation. GSE will not dismiss grievances based on a cursory review and close them in their grievance record unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

### **7.1.2 Grievance Records and Documentation**

The GSE Grievance Redress Specialist will manage a database to keep a record of all complaints recorded. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the complaint; any follow-up actions taken; the solutions and corrective actions implemented by the Contractor or other relevant party; the final result; and how and when this decision was communicated to the complainant.

Supervisor companies with monthly reports will provide information on grievance management. Monitoring and reporting and in the six-monthly and annual public reports.

## Company Contacts Information

The point of contact regarding the management of grievances by the Project and the local stakeholder engagement activities is GSE Environmental and Social Manager:

Description	Contact details
Company:	Georgian State Electrosystem (GSE)
To:	GSE General Director
Address:	2 Baratashvili street, Tbilisi 0105, Georgia
E-mail:	<a href="mailto:info@gse.com.ge">info@gse.com.ge</a>
Website:	<a href="http://www.gse.com.ge">www.gse.com.ge</a>
Telephone:	+995 555 111 144

Information on the Project and future engagement programmes will be available on the GSE's website and will be posted on information boards in key villages in the Project area. Information can also be obtained from the Community Liaison Officers.

Through its previous World Bank funded projects, GSE has already established a protocol for confidential survivor-centered approach to handling sensitive complaints, including those related to gender-based violence, sexual exploitation, abuse or harassment involving project personnel. The protocol provides guidance on handling such complaints such as maintaining confidentiality of the complainant, requesting only most essential information, informing the complainant of their choice to register the complaint with other institutions, referring the complainant to urgent medical help or other relevant services, among others. To this end, GSE already has working relations with state service, ATIP Fund, that provides assistance and shelter in case of GBV incidents. All project workers and local communities will receive awareness training on the availability of the GBV-sensitized grievance mechanism. Grievance focal points will receive in-depth training on applying the protocol for sensitive complaints.

## 7.2 Workers' Grievance Mechanism

GSE's HR Department developed and implements a Grievance Mechanism for GSE employees to address workplace concerns. This regulation ensures that all GSE employees have an equal and equitable opportunity to address their dissatisfaction by submitting a formal complaint. This provision encompasses a wide range of issues that may lead to dissatisfaction, including working conditions, health and personal safety, instances of bullying, harassment, the overall work environment, organizational changes, discrimination, and related concerns. Employees are entitled to appeal the committee's decisions within five days of the initial determination.

Upon filing a complaint, employees must either place it in GSE's designated complaint box or send it to the email address: [hr.grievance@gse.com.ge](mailto:hr.grievance@gse.com.ge). The senior specialist in the Human Resources and Communication Department is responsible for daily monitoring of the complaint mailbox, ensuring the prompt delivery of received correspondence to the committee secretary.

A dedicated standing committee, whose composition is approved by the Chairman of the Board of Governors/Rehabilitation Manager, is established to manage the initial stage of complaint review. The Chair of the GSE Board of Governors/Rehabilitation Manager serves as the final decision-maker for approving recommendations put forth by the Grievance Review Committee and/or the Appeals Committee.

The workers grievance mechanism will include a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline:

- stipulated timeframes to respond to grievances;
- a register to record and track the timely resolution of grievances;
- a responsible department to receive, record and track resolution of grievances.

The Supervision Consultant will monitor the contractors’ recording and resolution of grievances, and report these to GSE in their monthly progress reports. The process will be monitored by the GRM Focal Point, a GSE representative who will be responsible for the project GRM.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances, and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed.

### 7.3 GSE Contact Information

The point of contact regarding grievance management and the local stakeholder engagement activities is the Permissions Department Manager:

Description	Contact details
Company:	Georgian State Electrosystem (GSE)
To:	GSE Permissions Department Manager
Address:	2 Baratashvili street, Tbilisi 0105, Georgia
E-mail:	Hr.grievance@gse.com.ge
Website:	www.gse.com.ge
Telephone:	TBA

Information on the Project and future stakeholder engagement programs will available on the Project’s website and will be posted on information boards in affected villages in the Project area. Information can also be obtained from the Community Liaison Officers.

Six-monthly E&S reports that document the implementation of the Stakeholder Engagement Plan (SEP) will be disclosed on the Project website and made available in the local town halls.

In addition, for information on engagement with national and international stakeholders, and for information on the environmental and social performance of the Project, NGOs, CSOs and media are invited to contact GSE Head of Communications in Tbilisi:

Description	Contact details
Company:	Georgian State Electrosystem (GSE)
To:	GSE Head of Communications
Address:	2 Baratashvili street, Tbilisi 0105, Georgia
E-mail:	info@gse.com.ge
Description	Contact details
Website:	<a href="http://www.gse.com.ge">www.gse.com.ge</a>
Telephone:	TBA



## 8 Monitoring and Reporting

### 8.1 Involvement of stakeholders in monitoring activities

Monitoring reports documenting the environmental and social performance of the Project, including for Phase 1, will be prepared by the Community Liaison Team for submission to GSE management and to the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. Table 8-1 proposes a comprehensive set of indicators related to SEP performance at this stage.

*Table 8-1 SEP Indicators To Be Documented In Progress Reports*

<b>Engagement with PAPs</b>
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number of men and women that attended each of the meetings above
Number, location, attendance and documentation of the meetings held with the municipalities and communities or other stakeholders
For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project ESMP.
Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the report. They will summarize the view of attendees and distinguish between comments raised by men and women.
<b>Engagement with other stakeholders</b>
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs)
Issues raised by NGOs and other stakeholders, actions agreed with them and status of those actions
<b>Grievance Resolution Mechanism</b>
Number of grievances received, in total and at the local level, at Tbilisi headquarters, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods
<b>Workers Grievances</b>
Number of grievances raised by workers, disaggregated by gender of workers and worksite
Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.
Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

### 8.1.1 Quarterly and Annual Reports by GSE

During the Phase 1, the Community Liaison Team will prepare brief monthly reports on E&S performance for GSE Management which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 8-1. Monthly reports will be used to develop quarterly and annual reports reviewed by senior GSE managers. The quarterly and annual reports will be disclosed on the Project website and made available in the Town halls of the project affected Municipalities.

### 8.1.2 Six Monthly E&S Compliance Reports to the World Bank

Six-monthly E&S reports will be prepared and submitted to the World Bank during Phase 1. A section on stakeholder engagement will be included in these reports which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 8-1.

## 8.2 Involvement of stakeholders in monitoring activities

The Project provides several opportunities to stakeholders, especially Project Affected Parties to monitor certain aspects of Project performance and provide feedback. Grievance Resolution Committees will allow PAPs to submit grievances and other types of feedback. Furthermore, frequent and regular community meetings and interactions with GSE staff, especially local CLOs, will allow PAPs and other local stakeholders to be heard and engaged.

## 8.3 Reporting back to stakeholder groups

GSE's Community Liaison Team and its CLOs, will report back to PAPs and other stakeholder groups, primarily through public meetings in project affected Municipalities and/or Villages. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GRM will be responded to in writing and verbally, to the extent possible. SMS and phone calls will be used to respond to stakeholders whose telephone numbers are available. Key Project updates will be posted on GSE's website. Social media (primarily through the Project Facebook page and a WhatsApp group for PAPs and other stakeholders) will also be used to report back to different stakeholders.

## 9 Estimated Budget

A tentative budget for implementing the stakeholder engagement plan over 24 months (two years) is attached to the SEP. The table below summarizes all the stakeholder engagement activities in one place for better coordination and monitoring. GSE will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and a new revision distributed. The budget will be revised accordingly.

Stakeholder Engagement Plan - Estimated Budget (2 Years)					
<b>Stakeholder Engagement Activities</b>	<b>Quantity</b>	<b>Unit Cost (USD)</b>	<b>Times/ Years</b>	<b>Total Cost (USD)</b>	<b>Remarks</b>
Staff salary	1	6000	2	12000	
Social media staff/consultant (6 months/year@\$1000 per month)	1	6000	2	12000	
Travel expense for staff (cost per year)		1000	2	2000	

<b>Stakeholder Engagement Plan - Estimated Budget (2 Years)</b>					
<b><i>Stakeholder Engagement Activities</i></b>	<b>Quantity</b>	<b>Unit Cost (USD)</b>	<b>Times/ Years</b>	<b>Total Cost (USD)</b>	<b>Remarks</b>
Information Desks	1	100	1	100	
Project Launch Meetings	1	2500	1	2500	Space rent, catering, printed materials
Community Meetings/Sensitization (quarterly)	2	100	2	400	
Communications materials (pamphlets, posters, PR kits-including design)				1000	On issues such as GBV, EMF, community health/safety, Labor Health and Safety, environment, land acquisition,
Project tours for media, local representatives (1 per year), NGOs	1	1000	2	2000	maximum 11 representatives per tour
Engaging service providers, govt or non-govt (e.g. GBV, env issues)		5000	2	10000	
Development of a website				10000	
GBV training for relevant GSE and contractor/consultant staff	2	500	2	2000	
Citizen/PAP Interested Parties perception surveys		2500	2	5000	
Contingency (10%)				10000	
<b><i>Sub-Total - Stakeholder Engagement</i></b>				<b>59000</b>	
<b><i>Grievance Redress Activities</i></b>	<b>Quantity</b>	<b>Unit Cost (USD)</b>	<b>Times/ Years</b>	<b>Total Cost (USD)</b>	<b>Remarks</b>
Communications materials (GRM pamphlets, posters )	1200	0,5	2	1 200	
GRM guidebook/manual	100	10	1	1 000	
Suggestion boxes (in the municipality and villages)	10	50	1	500	
Training of GRM committees at municipality-level	1	100	2	200	One training/year in the municipality

<b>Stakeholder Engagement Plan - Estimated Budget (2 Years)</b>					
<b><i>Stakeholder Engagement Activities</i></b>	<b>Quantity</b>	<b>Unit Cost (USD)</b>	<b>Times/ Years</b>	<b>Total Cost (USD)</b>	<b>Remarks</b>
Internal GRM and other Trainings for GSE, Supervision and contractor staff	1	500	2	1000	One training for RD staff and others per year
Contingency (10%)				630	
<b><i>Sub-Total</i></b>				<b>4530</b>	
<b>Total</b>				<b>63530</b>	

*Annex 1 Grievance Submission Form*

Grievance Submission Form	
Name, Last name	
Contact Information Please indicate the preferable means of Communication (Mail, Telephone, E-mail)	<input type="checkbox"/> Mail: Please indicate the postal address: _____ _____ _____ <input type="checkbox"/> Telephone: _____ <input type="checkbox"/> E-mail: _____
The language desirable for the communication	<input type="checkbox"/> Georgian <input type="checkbox"/> English <input type="checkbox"/> Russian
Describe the grievance/claim: <span style="float: right;">What is the complaint about? What is the claim?</span>	
Date of Negotiation:	Resolution of Negotiation:
What is the basis of your claim?	
Signature: _____ Date: _____	