



Roads Department of Georgia

**REPORT**

**Kvesheti-Kobi road project**

*Stakeholder Engagement Plan*

Submitted to:

**European Bank for Reconstruction and Development**

Submitted by:

**Golder Associates S.r.l.**

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## ACRONYMS AND ABBREVIATIONS

ADB	Asian Development Bank
AP	Affected Person
CSO	Civil Society Organization
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
EU	European Union
FGD	Focus Group Discussions
GRCE	Grievance Redress Committee
GRCN	Grievance Redress Commission
HGV	Heavy Goods Vehicle
HH	Household
KII	Key Informant Interview
LAR	Land Acquisition and Resettlement
LARP	Land Acquisition and Resettlement Plan
MoE	Ministry of Environment Protection and Agriculture
MoRDI	Ministry of Regional Development and Infrastructure
NGO	Non-Governmental Organization
PCP	Public Communications Policy
PIP	Public Information Policy
PMS	Project Management and Supervision
PR	Performance Requirement
Q&A	Questions & Answers
RAP	Resettlement Action Plan
RD	Road Department
SEA	Stakeholder Engagement Activity

SEP	Stakeholder Engagement Plan
SPS	Safeguard Policy Statement
UNECE	United Nations Economic Commission for Europe
VHH	Vulnerable household

## 1.0 INTRODUCTION

The European Bank for Reconstruction and Development (EBRD) retained Golder Associates S.r.l. (Golder) to prepare the Stakeholder Engagement Plan (SEP) for the Kvesheti-Kobi Road Section (Lot 1 Tunnel South Portal Kobi and Lot 2 – Kvesheti – Tunnel South Portal) project (Project) to be developed in the Mtskheta-Mtianeti Region of Georgia.

The present SEP has been prepared to meet the requirements of the Georgian Legislation, EBRD's Environmental and Social Policy 2014 (ESP) and Public Information Policy 2014 (PIP), and ADB's Safeguard Policy Statement 2009 (SPS) and Public Communication Policy 2011 (PCP).

The Roads Department (RD) acts as project implementing agency and the Ministry of Regional Development and Infrastructure (MoRDI) of Georgia as project executing agency, while EBRD acts as lender together with the Asian Development Bank (ADB).

### 1.1 Scope and objectives

The present document provides the principles, objectives and procedures to be followed by the RD to develop open and transparent engagement with stakeholders throughout the Project lifecycle. Stakeholder engagement is central to building strong, constructive and responsive relationships, which are essential for the successful management of a project's environmental and social impacts.

Therefore, the primary objective of the SEP is to establish a framework for building and maintaining positive relationships with stakeholders during the entire lifecycle of the project, through the implementation of engagement activities. In addition, the SEP advises on the RD's roles and responsibilities, as well as how engagement activities should be monitored and reported.

The overall objectives of the SEP are the following:

- To promote improved environmental and social performance of the project through effective and ongoing engagement with the project's stakeholders including civil society organisations;
- To outline a systematic approach to stakeholder engagement that will help the proponent build and maintain a constructive relationship with stakeholders, in particular directly affected communities;
- To promote and provide a means for accessible, transparent and open engagement with affected communities throughout the project lifecycle on issues that could potentially affect them;
- To ensure that meaningful information on the project design and on its environmental and social impacts is disclosed to the project's stakeholders;
- To ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

More specific objectives of this SEP include:

- Identifying, mapping and assessing stakeholders and how they may be affected by or interested in the project.
- Ensuring that vulnerable and disadvantaged groups are identified and that reasonable measures are implemented to include them in on-going consultations.

The SEP applies to all activities performed as part of the Project. Moreover the SEP is a living document that will be updated during the development of the Project.



All stakeholders are invited to review and provide feedback on this SEP to the RD, using the following contacts:

Address: Georgia 0160, Tbilisi, Kazbegi ave N12,

Phone Number: (995 32) 37-05-08

Email Address: Info@georoad.ge

Corporate website: <http://www.georoad.ge/>

## 1.2 SEP structure

The SEP is structured as follows:

- Chapter 1 Introduction
- Chapter 2 Project Description
- Chapter 3 Regulatory and Policy Framework;
- Chapter 4 Project Stakeholders
- Chapter 5 Stakeholder Engagement Completed to Date
- Chapter 6 Stakeholder Engagement Program
- Chapter 7 Grievance Mechanism;
- Chapter 8 Roles and Responsibilities;
- Chapter 9 Monitoring and Reporting.

## 2.0 PROJECT DESCRIPTION

The Government of Georgia has launched a program (Regional Development Program of Georgia 2018-2021) to upgrade the major roads of the country. The program is managed by the Roads Department of the Ministry of Regional Development and Infrastructure and aims to improve transportation and transit of goods in Georgia and to surrounding countries.

As a part of the program, upgrading Jinvali-Larsi section of the E117 is planned. The Jinvali-Larsi corridor crosses the Caucasus mountains and aims to improve transportation to and from Russia. It consists of three sections: Jinvali - Kvesheti, Kvesheti-Kobi and Kobi-Larsi. The Kvesheti-Kobi section (hereafter the Project) is the first of the three to be developed and is the subject of this SEP. The KK section is the most challenging one as it includes the 9 km main tunnel that will cross the Caucasus ridge and bypass the existent road that connects Kvesheti to Tskere through Gudauri area and the Jivari pass.

The main results expected from investment in Kevesheti - Kobi road include guaranteeing operational continuity during wintertime when transportation has been hindered historically, improvement of safety by reduction in fatality, injury and accident rates and travel time savings for passengers and freight transport.

From an administrative standpoint, the proposed Project is situated entirely in the Mtskheta-Mtianeti Region, across the Dusheti and Kazbegi municipalities. Specifically, the Project spans from the Kvesheti area and Khada Valley in the Dusheti Municipality to the Kobi area in the Kazbegi Municipality.

For the construction and tendering process, the alignment has been split into two sections:

- Lot 1 – Tskere –Kobi (10 km), comprising of the main tunnel, and
- Lot 2 – Kvesheti-Tskere (12 km).

Key design features of Lot 1 and Lot 2 sections are summarised below, and an overview of the alignment location is presented in Figure 1: .

Lot 1 includes:

- 178m long section of the road from Tskere to the south portal of the tunnel
- 8.86km long bidirectional, 2 lane tunnel (max. gradient 2.35%)
- 9.06km emergency gallery parallel to the tunnel and 17 connections to the main tunnel
- Technical buildings next to the North and South portal; the buildings include facilities building, pumping station and ventilation room;
- Design speed 80 km/h.

Lot 2 starts near Kvesheti and continues to Tskere before reaching the village at chainage 12+720. The route includes 2.5 km of tunnels and 1.5 km of bridges. The main elements of this section are:

- Kvesheti bypass road
- 6 bridges
- 4 tunnels, two built with the drilling/blasting technique and two built with the cut and cover technique
- 5 grade junctions and 3 service roads
- Design speed 80 km/h.

The construction of the tunnels will generate surplus earthworks materials; landfilling will hence be required for these materials.

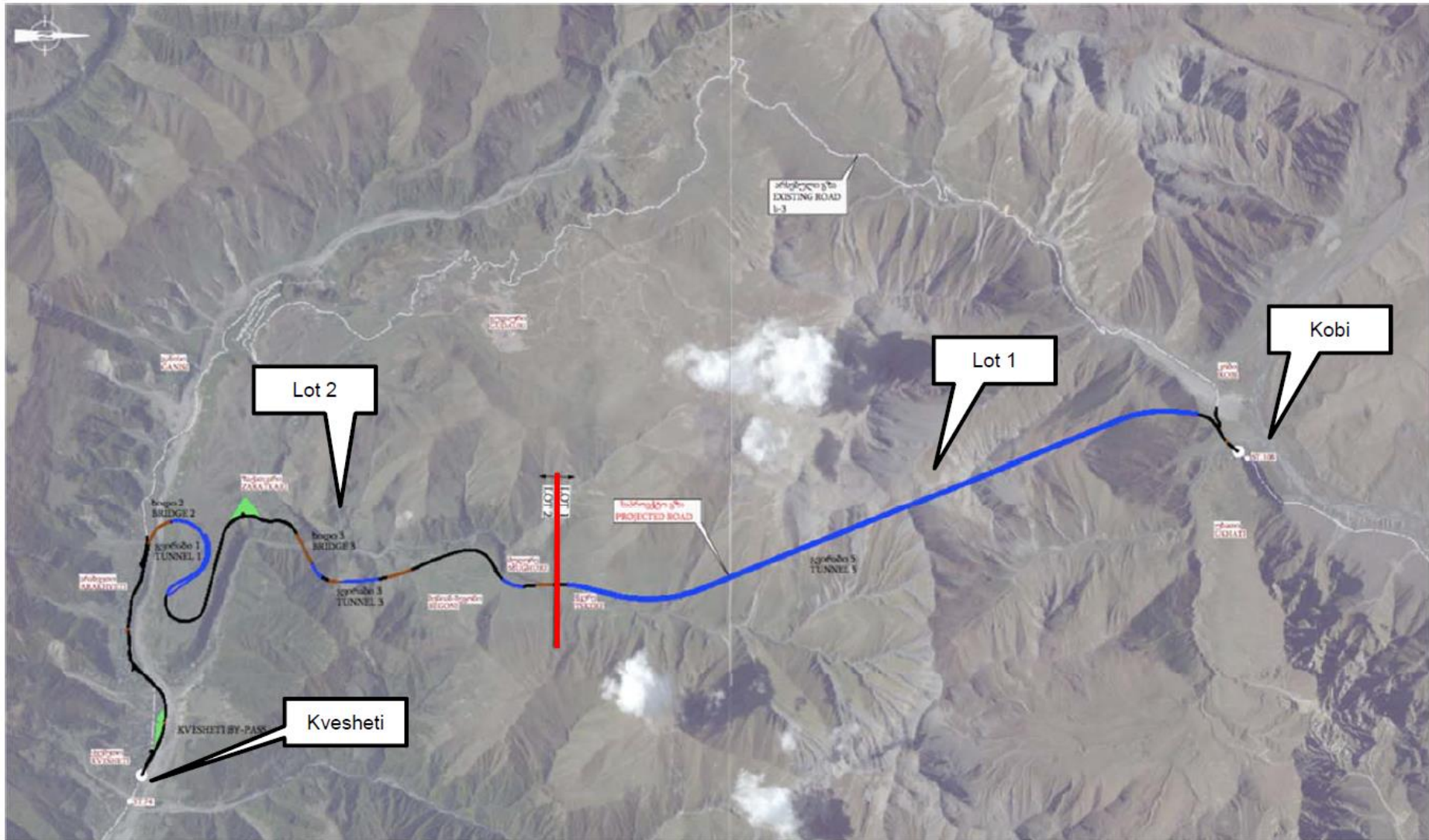


Figure 1: Lot 1 and Lot 2 alignment overview.

## 2.1 Project justification and predicted impacts

This section provides an outline of the project justification and of the predicted impacts, as identified within the Environmental Impact Assessment (EIA) report.

### Status of Existing Road

Due to its geographic location, Georgia's role as a major transit country is significant. Transport of goods into and through Georgia has increased over the past 10-15 years. Almost two-thirds of goods in Georgia are transported by road by domestic and international truck companies. Many of the roads are however poorly equipped to cope with the volume of traffic and the proportion of heavy vehicles. Other factors such as insufficient dual carriageways, routing through inhabited areas and inadequate maintenance and repair, hinder throughputs and increase transit times. This creates difficulties for haulage companies and their clients, truck drivers, Georgian motorists and local residents. The following main issues are affecting the current status of the road:

- Deterioration of the existing road which is often closed due to snow fall during the winter months thereby impeding the economic development of the Project Area and the region in general;
- Significant increase in congestion on the existing road especially during the tourist season which leads to degradation of air quality in and around Gudauri;
- Difficulties maneuvering HGVs which leads to a high level of delays and demand affected.

### Benefits of New Road

- Improving operational continuity of the North South Highway even during wintertime;
- Improving safety, including reduction in fatality, injury and accident rates especially in the winter when tourist traffic heading to Gudauri will be separated from vehicles in transit to Kobi and beyond;
- Travel time savings for passengers and freight transport. At the same time the existing road will be kept operational thereby acting almost exclusively as access to Gudauri.

### Project impacts

The EIA has established that most impacts potentially generated by the Project can be either totally prevented or adequately mitigated. The main impacts identified throughout EIA are listed and briefly described below:

- Notable Habitats: whilst some habitats will be lost, mitigation measures and offsetting will reduce such impacts to acceptable levels during the construction phase. During operation impacts to notable habitats will result from potential pollution and increased indirect impacts to habitats.
- Notable Species: direct impacts will be associated with habitat loss, disturbance and accidental mortality. Indirect impacts could also arise from fragmentation and disturbance from increased numbers people to the valley. The implementation of mitigation measures along with the Project Biodiversity Action Plan (BAP) means that such impacts are, however, expected to be reduced to an acceptable level. The operation of the road will result in direct impacts to notable species from RTAs as well as indirect impacts associated with disturbance, habitat fragmentation, pollution and increased access to habitats, although given the number of tunnels and bridges for the Project this is not thought to be high.
- Waste: in general, if the mitigation measures suggested are implemented, residual impacts will be minor. However, restoration requirements for spoil disposal areas will be significant and take a number of years.
- Greenhouse Gases: residual impacts from the generation of GHGs will remain throughout the lifecycle of the Project. This is an unavoidable consequence of the Project, but the growth of the electric car market

and more fuel-efficient cars may, in the future lead to a decrease in the emissions generated on the Project road.

- **Landscape:** Cut slopes, embankments, concrete bridges and tunnels will have an impact on the landscape within the valley throughout the Project lifecycle. Selection of the arch bridge in the Khada Valley and implementation of mitigation measures may go some way to enhancing the aesthetic value of the Project especially as reinstated vegetation grows back around construction zones.
- **Community health and safety:** during the construction phase, there might be the potential for a temporary increase in road traffic accidents between vehicles, pedestrians and vehicles and livestock and vehicles. There will also be short term impacts to noise and air quality. Migrant workers may also increase community health and safety risks. Based on these potential impacts a community health and safety plan will need to be implemented during construction and a dedicated plan relating to road safety and traffic management will also need to be developed.
- **Physical and Cultural Resources:** most of the physical cultural resources within the Project area are set back more than 100 meters from the Project road and are unlikely to be impacted during construction. However, some cemeteries, churches, towers, war monuments and religious crosses have been identified throughout the Project corridor that are within 50 meters of the alignment and may be impacted during construction works. It is possible, given the rich cultural heritage of Georgia, that chance finds could occur during excavation works, so Cultural Heritage Monitors will be present during earthworks in higher sensitivity areas and a Chance Find Procedure will be implemented during construction.
- **Land Acquisition and Resettlement:** for the development of the project, it will be necessary to acquire a number of land plots and houses located within, or in the immediate vicinity of, the footprint of the road and structures. A Land Acquisition and Resettlement Plan (LARP) will be in place to respond to these issues and a livelihood restoration program will be implemented for those negatively affected.
- **Noise and vibration:** a noise model prepared for the Project has indicated that many of the villages within the Project corridor will be temporarily impacted by increased levels of construction noise. In addition, a noise model was developed to determine the future noise levels on the Project road upon completion and in twenty years' time. The results of the model showed mitigation in the form of noise barriers or soil berms will need to be implemented to ensure that noise levels do not exceed IFC guideline limits, notably for the night time period. A vibration assessment prepared for this EIA has indicated that only a few properties may be impacted by general road construction works and equipment and bridge piling works. There are no properties above any of the planned tunnels, or within close proximity to the tunnels. During operation highway traffic is not likely to have any measurable impact on the structures or on comfort.
- **Lighting:** street lighting can impact upon the local community and residential areas if the light is not shielded correctly and light 'spill' occurs. In these terms light spill only has the potential to impact upon the residential areas of Kvesheti and Arakveti, all other villages and properties are too far away from the road to be significantly impacted. A simple solution is to provide suitable shielding. Effective shielding can maximize the desired effects of lighting by controlling the light output and minimizing glare and light spill.
- **Access:** the inclusion of bridges and tunnels in the design means that there are few areas where access is blocked due to the new road. In some of these areas, based on consultation with the local communities, underpasses have been provided or local roads diverted under bridges to allow free movement of people and cattle around the valley.

## 3.0 REGULATORY AND POLICY FRAMEWORK

### 3.1 National regulations

#### 3.1.1 Environmental Assessment Code (2017)

Requirements for public consultation are set forth in the Environmental Assessment Code (2017), which stipulates that public consultation must be performed during the Scoping and EIA phase, as outlined in the paragraphs below.

#### Scoping phase

The public has 15 days after the publication of the Scoping Report to submit feedback, which the Ministry must take into account if there are appropriate grounds.

Between the 10<sup>th</sup> and the 15<sup>th</sup> day the Ministry must hold a public review of the scoping report in a venue within the administrative jurisdiction closest to the location of the planned activities. A minimum notice of 10 days of meeting details and location are provided to the public. The Ministry maintains minutes of the meeting.

Between the 25<sup>th</sup> and the 30<sup>th</sup> day after the scoping application submission, the Ministry must issue a scoping opinion related to the list of studies and information that must be addressed in the EIA report.

#### EIA disclosure phase

The public has 40 days after the publication of the EIA on the Ministry's website to submit feedback, which the Ministry must take into account if there are appropriate grounds.

Between the 25<sup>th</sup> and the 30<sup>th</sup> day from submission of the EIA, the Ministry must hold a public review of the EIA report in a venue within the administrative jurisdiction closest to the location of the planned activities. Similar to the scoping phase, the meeting is open to the public, with a 20-day notice provided. Meeting minutes are recorded by a representative of the Ministry.

Between the 51<sup>st</sup> and the 55<sup>th</sup> day after the EIA application submission, the Ministry issues an individual administrative act which provides or denies the environmental authorization for the project.

## 3.2 International Agreements and Conventions

### 3.2.1 Aarhus convention

In April 2000, Georgia ratified the Aarhus convention. This UNECE Convention (United Nations Economic Commission for Europe) establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Convention provides for:

- the right of everyone to receive environmental information that is held by public authorities ("access to environmental information");
- the right to participate in environmental decision-making ("public participation in environmental decision-making");
- the right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").

## 3.3 International standards

### 3.3.1 European Union

The EBRD, as a signatory to the European Principles for the Environment, is committed to promoting the adoption of European Union environmental principles, practices and substantive standards by EBRD-financed projects, where these can be applied at the project level, regardless of their geographical location. When host

country regulations differ from EU substantive environmental standards, projects will be expected to meet whichever is more stringent.

Environmental Impact Assessment is a key instrument of European Union environmental policy. Since the inception of the first EIA Directive in 1985 (Directive 85/337/EEC) both the law and the practice of EIA have evolved. An amending Directive was published in 2014 (Directive 52/14/EU).

With regards to stakeholder engagement, the Directive states that:

- the public concerned in the decision-making procedures has to be informed electronically and by public notices or by other appropriate means, as soon as information can reasonably be provided;
- Reasonable time-frames for the different phases shall be provided for the public concerned to prepare and participate effectively in the environmental decision-making.

### 3.3.2 European Bank for Reconstruction and Development Performance Requirements

Because EBRD is a lender to the project, the present SEP has been prepared to comply with EBRD's Performance Requirements. The EBRD requirements for project information disclosure are stringent and exceed the requirements of the European Union (as defined by the Aarhus Convention and Espoo Convention). Requirements on stakeholder engagement are outlined in EBRD's Environmental and Social Policy of May 2014 under the Performance Requirement (PR) 10 Information Disclosure and Stakeholder Engagement and in the Public Information Policy approved in 2014.

The EBRD requires that clients conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation. According to PR 10 stakeholder engagement must involve the following elements:

- stakeholder identification and analysis,
- stakeholder engagement planning,
- disclosure of information,
- consultation and participation,
- grievance mechanism, and;
- ongoing reporting to relevant stakeholders.

For projects that are likely to have adverse environmental or social impacts and issues, EBRD requires to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale or the risks, impacts and development stage of the project.

The PIP sets out how the EBRD discloses information and consults with its stakeholders so as to promote better awareness and understanding of its strategies, policies and operations.

### 3.3.3 Asian Development Bank

Likewise, because the ADB is a lender to the project, the present SEP has been prepared in line with ADB's policies. ADB prioritizes consultation and participation with key stakeholders, including civil society organizations. ADB's new corporate strategy, Strategy 2030: Achieving a Prosperous, Inclusive, Resilient, and Sustainable Asia and the Pacific (2018), emphasizes how the ADB will strengthen collaboration with civil

society organizations, while the ADB's Safeguards Policy Statement (2009) requires meaningful consultation with affected communities.

Drawing on its 2030 strategy, ADB is committed to exploring opportunities for increasing CSOs involvement in the design and implementation of projects supported by ADB, with particular focus on operations that use grassroots participatory approaches to target the poor and vulnerable groups, mobilize women and young people, and monitor project activities and outputs.

For alignment with ADB's safeguards and objectives, the following should be considered:

- Avoid adverse impacts of projects on the environment and affected people, where possible;
- Minimize, mitigate, and/or compensate for adverse project impacts on the environment and affected people when avoidance is not possible; and
- Help borrowers/clients to strengthen their safeguard systems and develop the capacity to manage environmental and social risks.

With regards to information disclosure, ADB is committed to working with the borrower/client to ensure that relevant information (whether positive or negative) about social and environmental safeguard issues is made available in a timely manner, in an accessible place, and in a form and language(s) understandable to affected people and to other stakeholders, including the general public, so they can provide meaningful inputs into project design and implementation.

In addition, in 2011 the ADB issued a Public Communications Policy, to guide the institution's efforts to be transparent and accountable to the people it serves. The overall objective of the policy is to enhance stakeholders' trust in and ability to engage with ADB. On 1 Jan 2019, the Public Communications Policy was superseded by a new Access to Information Policy.

## 4.0 PROJECT STAKEHOLDERS

For the purpose of this SEP, stakeholders are defined as persons or groups (i) who are affected or likely to be affected (directly or indirectly) by the project (affected parties); or (ii) may have an interest in the project (other interested parties).

In order to implement effective organization of engagement activities and to build strong relations with the local communities, a number of community representatives have been identified during the EIA process to reflect to the extent possible community interests and facilitate dialogue. Community representatives can include community or religious leaders, local government representatives, civil society representatives, politicians, teachers, among others.

The following sections describe the stakeholder identification process and analysis of stakeholders undertaken for the Project. It is important to note that stakeholder analysis should be regularly conducted to reflect changes in affected or interested parties that may occur during the Project's planning stages, development and operation. To enable this, a Stakeholder Register has been developed as part of the EIA and should be kept up-to-date throughout the Project cycle by the RD. A preliminary list of stakeholders is presented in **Appendix A**.

### 4.1 Stakeholder identification

Stakeholder identification has been conducted through a review of engagement activities undertaken to date and a review of secondary information. This list will be regularly reviewed and updated by RD.



The table below presents the main categories and groups of stakeholders affected by or interested in Project activities.

**Table 1: Stakeholder identification**

Category	Group	Definition and Impact
<b>Affected stakeholders</b>		
Communities	Affected communities and individuals	<p>Affected communities: settlements affected both by Project impacts and benefits. Impacts include loss of land, assets including cultural heritage sites; sustain noise, vibration and air quality impacts; severance impact. Benefits include reduced travel time to villages, increased access to services and safer road conditions.</p> <p>The following settlements will be directly affected by the Project:</p> <ul style="list-style-type: none"> <li>■ Kvesheti,</li> <li>■ Arakhveti,</li> <li>■ Zakatkari,</li> <li>■ Tskere,</li> <li>■ Mughere,</li> <li>■ Kobi,</li> <li>■ Sviana-Rostani,</li> <li>■ Gomurni,</li> <li>■ Begoni, and</li> <li>■ Beniani</li> </ul>
		<p>Affected individuals: people who will be affected by loss of land, assets or livelihoods, including access to these through severance impacts, and will require compensation and / or relocation, including:</p> <ul style="list-style-type: none"> <li>■ shepherds</li> </ul>
		<p>Vulnerable groups: defined by EBRD as people who by virtue of various factors “<i>may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits</i>”<sup>1</sup>. In the Georgian regulatory context vulnerable groups are defined as women headed households, people with disability or other people receiving disability support from the Government, those living below the national poverty line, pensioners, and internally displaced people.</p>
Businesses, utilities and other infrastructure owners	Affected businesses	<p>Businesses that will experience both Project impacts and benefits. Impacts include loss of land, assets or revenue, including roadside market stall owners, and formal and informal businesses affected by land acquisition. Benefits include reduced travel time, increased economic opportunities and easier access to customers and markets.</p>
	Affected utilities	<p>State owned or private utility and infrastructure owners such as</p>

<sup>1</sup> Source: EBRD. 2014. Environmental and Social Policy. Accessed: <https://www.ebrd.com/downloads/research/policies/esp-final.pdf>

Category	Group	Definition and Impact
	and other infrastructure	telecommunications, power supply, waste management facilities, local roads.
Government	Municipal and regional administrations	Relevant government authorities including Dusheti municipality, Kazbegi municipality and Mtskheta-Mtianeti region.
	National government and authorities	Lead agencies mandated to review and advise on the project's development, including: <ul style="list-style-type: none"> <li>■ Roads Department of Georgia</li> <li>■ Ministry of Environment Protection and Agriculture</li> <li>■ Ministry of Regional Development and Infrastructure</li> <li>■ Ministry of Culture and Monument Protection</li> <li>■ Agency for Protected Areas</li> <li>■ Mountain and Forest Development Agency</li> <li>■ National Environmental Agency</li> <li>■ Legal Entity of Public Law</li> <li>■ Police</li> <li>■ National Tourism Administration</li> </ul>
<b>Interested parties</b>		
Communities	Surrounding communities	Settlements that have an interest in or influence on project development such as Gudauri.
Businesses, agencies	Surrounding businesses	Businesses that operate or plan to operate in the vicinity of the project or will have an interest in the project, including: <ul style="list-style-type: none"> <li>■ Gudauri Ski Resort</li> <li>■ Chambers of Commerce</li> <li>■ Trade Unions</li> <li>■ Gas Transportation Company</li> </ul>
Civil Society Organisations	NGOs and local associations	Organisations active in the Project area of influence, including: <ul style="list-style-type: none"> <li>■ World Wildlife Fund (WWF)</li> <li>■ CENN</li> <li>■ Georgian Greens</li> <li>■ Green Alternative</li> <li>■ Greens Movement of Georgia.</li> <li>■ Georgian Environmental Outlook (GEO)</li> <li>■ Georgian Centre for Biodiversity Conservation and Research (NACRES)</li> <li>■ Georgian Centre for the Conservation of Wildlife</li> </ul>

Category	Group	Definition and Impact
		<ul style="list-style-type: none"> <li>■ Caucasus Nature Fund</li> <li>■ Center for Strategic Research and Development of Georgia (CSRDG)</li> <li>■ Women in Europe for a Common Future (WECF)</li> <li>■ Economic Policy Research Center (EPRC)</li> <li>■ Mountain Development Center (MDC)</li> <li>■ SABUKO</li> <li>■ Association for Well-being of Society (AWS)</li> <li>■ Regional Development Center (RDC)</li> <li>■ Dusheti Development Fund</li> <li>■ Stefantsminda</li> <li>■ Women for Regional Development</li> <li>■ Future of Khevi Stepantsminda-based NGO</li> <li>■ Georgian Eco-Tourism Association</li> </ul>
Civil Society Organisations	Academia and sector experts.	<p>Sector experts that can provide support throughout engagement activities to respond to questions and comments from stakeholders, including:</p> <ul style="list-style-type: none"> <li>■ Stepantsminda Institute of Alpine Ecology of Ilia State University</li> </ul>
International partners	Project financiers	Organisations providing finance for the development of the project including EBRD and ADB.
Press and media	Local and national press and media	Press and general media groups can have the role of informing the general public about the Project's impacts and benefits.

## 4.2 Stakeholder analysis

An analysis of the potential expectations and concerns of stakeholder categories is presented in the table below. The table is based on the outcomes of engagement and EIA activities performed to date and on what can be likely expected.

**Table 2: Stakeholder analysis**

Group	Stakeholders	Description and Interest in Project Development and Operation	Influence on Project	Current state of engagement	Category of engagement
Affected	- Affected settlements	- Will be directly	- May delay project	Fully engaged	Anticipate

Group	Stakeholders	Description and Interest in Project Development and Operation	Influence on Project	Current state of engagement	Category of engagement
communities	- Affected Persons	<ul style="list-style-type: none"> <li>- affected by the project land acquisition, air quality, noise, vibration and severance impacts.</li> <li>- Will experience benefits including reduced travel time to villages, increased access to services and safer road conditions.</li> <li>- Will require compensation for loss of livelihoods, land or assets</li> <li>- May be exposed to environmental and social issues (e.g. Interactions with temporary workforce.)</li> </ul>	<ul style="list-style-type: none"> <li>- development and / or cause disruption to project property. May cause loss of financing for the project.</li> <li>- Project success contingent on acceptance by affected communities.</li> <li>- Can provide input into the project design, identifying potentially sensitive areas, impacts or solutions.</li> </ul>		and meet needs
Vulnerable groups	<ul style="list-style-type: none"> <li>- Women-headed households</li> <li>- Pensioners</li> <li>- Disables persons and other people receiving disability support from the Government;</li> <li>- Internally Displaced People.</li> </ul>	<ul style="list-style-type: none"> <li>- May be disproportionately affected by project activities due to vulnerable status.</li> </ul>	<ul style="list-style-type: none"> <li>- May have difficulties in participating in engagement activities and in providing feedback.</li> </ul>	Fully engaged	Anticipate and meet needs; Make special provisions to ensure participation in engagement activities (see stakeholder engagement program).
Affected businesses	<ul style="list-style-type: none"> <li>- Roadside market stall owners</li> <li>- Formal and informal businesses</li> <li>- Other industries (utilities)</li> </ul>	<ul style="list-style-type: none"> <li>- Businesses that will experience loss of land, assets, revenue, services and livelihoods.</li> <li>- Businesses that will experience benefits including reduced travel time, increased economic opportunities and easier access to customers and markets.</li> <li>- Support local and regional economy through direct employment opportunities for local communities, provide government revenue</li> </ul>	<ul style="list-style-type: none"> <li>- May delay project development.</li> <li>- May disagree with compensation and / or relocation process and request large compensation.</li> </ul>	Moderately engaged	Anticipate and meet needs

Group	Stakeholders	Description and Interest in Project Development and Operation	Influence on Project	Current state of engagement	Category of engagement
		in taxes, etc.			
Municipal and Regional Government	<ul style="list-style-type: none"> <li>- Dusheti municipality</li> <li>- Kazbegi municipality</li> <li>- Mtskheta-Mtianeti region</li> </ul>	<ul style="list-style-type: none"> <li>- Responsible for local rural development.</li> </ul>	<ul style="list-style-type: none"> <li>- May be able to act in a support role for the project e.g. supervision, grievance management.</li> <li>- Can facilitate project information disclosure</li> </ul>	Moderately engaged	Manage closely
National stakeholders	<ul style="list-style-type: none"> <li>- Lead agencies and ministries</li> </ul>	<ul style="list-style-type: none"> <li>- Have direct interest in aspects of the project (e.g. cultural heritage sites, biodiversity, rural development, tourism)</li> <li>- Legally mandated to oversee different aspects of the project.</li> </ul>	<ul style="list-style-type: none"> <li>- Ultimate decision makers on project development.</li> <li>- Can influence public opinion about the project.</li> <li>- Information dissemination.</li> </ul>	Fully engaged	Manage closely
NGOs,	<ul style="list-style-type: none"> <li>- NGOs working in the fields of rural development and livelihood diversification, biodiversity conservation, governance capacity.</li> <li>- Sector experts in road development, rural planning and development, geomorphology, etc.</li> </ul>	<ul style="list-style-type: none"> <li>- Have detailed understanding of local issues, community needs and local governance.</li> </ul>	<ul style="list-style-type: none"> <li>- Can provide a positive or negative perspective on the project to affected and interested stakeholders.</li> <li>- Can offer partnerships and assistance with implementation of the RAP and community development programs.</li> <li>- Can facilitate project information disclosure.</li> <li>- Can assist mobilising communities during consultations to solicit their feedback and generate support for the project during project implementation.</li> </ul>	Moderately engaged	Show consideration
Academia and sector experts	<ul style="list-style-type: none"> <li>- Sector experts in road development, rural planning and development, geomorphology, etc.</li> </ul>	<ul style="list-style-type: none"> <li>- Interest on project impacts on specific sectors.</li> </ul>	<ul style="list-style-type: none"> <li>- Can facilitate project information disclosure.</li> </ul>	Moderately engaged	Show consideration
International	<ul style="list-style-type: none"> <li>- ADB, EBRD</li> </ul>	<ul style="list-style-type: none"> <li>- Provide project</li> </ul>	<ul style="list-style-type: none"> <li>- May delay project</li> </ul>	Fully engaged	Keep

Group	Stakeholders	Description and Interest in Project Development and Operation	Influence on Project	Current state of engagement	Category of engagement
partners		<ul style="list-style-type: none"> <li>- financing. Mandated to ensure organisation specific environmental and social safeguards are adhered to.</li> <li>- Liable for the project's environmental and social risks.</li> </ul>	<ul style="list-style-type: none"> <li>- development. May withhold financing</li> <li>- Can offer technical support into environmental and social management and risk mitigation of the project.</li> </ul>		informed
Press and media	<ul style="list-style-type: none"> <li>- Local and national newspapers, websites, radio and televisions</li> </ul>	<ul style="list-style-type: none"> <li>- Informing the public on the project, collecting and disseminating comments and opinions from different stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>- Can facilitate project information disclosure.</li> </ul>	Moderately engaged	Keep informed

## 5.0 STAKEHOLDER ENGAGEMENT COMPLETED TO DATE

From April 2018 to February 2019, more than 40 stakeholder engagement events have been held.<sup>2</sup> The events, summarized in Table 3, were organized by the RD with support from ADB and EBRD experts as well as consulting firms. They included public meetings, focus group discussions and one-one meetings with affected communities, civil society meetings, and expert consultations with both government and civil society representatives. Guided by the SEP, the events were carried out in line with national requirements as well as those of both ADB and EBRD.<sup>3</sup>

The 40 events broadly covered three topics – EIA process, the LARP, and a proposed eco-tourism component of the project, as listed below:

- Environmental Impact Assessment Process (22 events)
  - 5 public meetings
  - 5 one-on-one meeting days with affected communities
  - 2 civil society meetings
- 8 expert consultation events with NGOs
  - 2 expert consultation events with MoEPA's biodiversity department.
- Land Acquisition and Resettlement Plan (13 events)
  - 6 public meetings with affected communities
  - 7 focus group discussions with affected communities

<sup>2</sup> Prior to ADB's involvement in the project (May/2018), consultation events were held during pre-feasibility, feasibility, and design stages of the project, but due to limited information availability, they are not included in this summary.

<sup>3</sup> A project Communications Plan was finalized in February 2019 to guide a range of activities to implement the Stakeholder Engagement Plan that are not event-related. For example, a Frequently Asked Questions (FAQ) and Fact Sheet were recently produced and disseminated.

- Potential Eco-tourism Component of the Project (5 events)
  - 3 meetings with NGOs/Associations
  - 2 meetings with municipality mayors – Dusheti and Kazbegi

More than half of the events held during the period were EIA related. These events collected environmental and social baseline data, disclosed the EIA Scoping Report and subsequent draft international and national EIA reports, and gathered feedback to refine the international EIA before its finalization and final disclosure. Georgian law requires one public meeting to disclose the EIA Scoping Report and one public meeting to disclose the National EIA. The Project exceeded this requirement by holding two meetings for each of these disclosure requirements (events 7,8, 32, and 33 in Table 3).

The detailed consultations required for LARP preparation are well-advanced with 13 events carried out on LARP preparation. In addition, each household directly affected has been further engaged in preparation of the Detailed Measurement Survey (DMS) as part of the LARP.

The proposed eco-tourism component of the Project is a recent initiative and is still in the early stages of planning, following initial consultations with civil society and local and national government. Consultations with affected communities on potential eco-tourism activities are currently being scheduled and will likely continue throughout 2019.

As further consultation events will be ongoing, updated stakeholder engagement reports will be produced periodically, as indicated in section 9.2.

**Table 3: Summary of Stakeholder Engagement Events (April 2018 to February 2019)**

No.	Event type and topic	Date	Location	Stakeholder group
1	One-on-one meetings – EIA	4 April 2018	Tetri Aragvi and Khadistskail gorge settlements	Affected communities
2	One-on-one meetings – EIA	11 April 2018	Natvani, Baidara, and Tergi	Affected communities
3	One-on-one meetings – EIA	19 April 2018	Tskere, Kobi	Affected communities
4	One-on-one meetings – EIA	8 May 2018	Zakatkari	Affected communities
5	One-on-one meetings – EIA	12 May 2018	Settlements along Kvesheti-Kobi alignment	Affected communities
6	Public meeting – project introduction and LARP	14 May 2018	Kvesheti	Affected communities
7	Public meeting – EIA Scoping disclosure	10 July 2018	Kvesheti	MoEPA, Affected communities and interested stakeholders
8	Public meeting – EIA Scoping disclosure	10 July 2018	Kobi	MoEPA, Affected communities and interested stakeholders

No.	Event type and topic	Date	Location	Stakeholder group
9	Civil society meeting – EIA	13 Aug 2018	Tbilisi	NGOs, residents, government representatives
10	Focus group discussion – LARP	30 Aug 2018	Begoni	Affected communities
11	Focus group discussion – LARP	30 Aug 2018	Kvesheti	Affected communities
12	Focus group discussion – LARP	31 Aug 2018	Kobi	Affected communities
13	Civil society meeting – EIA	4 Sept 2018	Tbilisi	NGOs, businesses, government representatives
14	Public meeting alignment/alternatives/EIA	7 Sept 2018	Mleta	Affected communities
15	Expert meeting – EIA	10 Sept 2018	Tbilisi	NGOs
16	Expert meeting – EIA	10 Sept 2018	Tbilisi	NGOs
17	Expert meeting – EIA	11 Sept 2018	Tbilisi	National government
18	Expert meeting – EIA	11 Sept 2018	Tbilisi	NGOs
19	Public meeting – LARP	14 Sept 2018	Begoni	Affected communities
20	Public meeting – LARP	14 Sept 2018	Tskere	Affected communities
21	Public meeting – LARP	15 Sept 2018	Kvesheti	Affected communities
22	Public meeting – LARP	15 Sept 2018	Zakatkari	Affected communities
23	Expert meeting – EIA biodiversity	26 Sept 2018	Tbilisi	NGOs
24	Expert meeting – EIA biodiversity	26 Sept 2018	Tbilisi	NGOs
25	Expert meeting – EIA biodiversity	26 Sept 2018	Tbilisi	NGOs
26	Expert meeting – EIA biodiversity	28 Sept 2018	Tbilisi	National government
27	Focus group discussion – LARP	16 Oct 2018	Kvesheti	Affected communities
28	Focus group discussion – LARP	16 Oct 2018	Tskere	Affected communities
29	Focus group discussion – LARP	16 Oct 2018	Beniani-Begoni	Affected communities
30	Focus group discussion – LARP	17 Oct 2018	Kobi	Affected communities
31	Expert meeting – EIA biodiversity	10 Nov 2018	Tbilisi	NGOs
32	Public meeting – National EIA	10 Dec 2018	Kobi	MoEPA, Affected



No.	Event type and topic	Date	Location	Stakeholder group
	disclosure			communities and interested stakeholders
33	Public meeting – National EIA disclosure	10 Dec 2018	Mleta	MoEPA, Affected communities and interested stakeholders
34	Public meeting – LARP	9 Jan 2019	Mleta	Affected communities, government representatives
35	Expert meeting – ecotourism	30 Jan 2019	Tbilisi	NGOs
36	Expert meeting – EIA	1 Feb 2019	Tbilisi	NGOs
37	Expert meeting – EIA /ecotourism	1 Feb 2019	Tbilisi	NGOs
38	Expert meeting – ecotourism	1 Feb 2019	Tbilisi	NGOs
39	Meeting – ecotourism	4 Feb 2019	Dusheti	Local government (Dusheti Mayor)
40	Meeting – ecotourism	4 Feb 2019	Stepantsminda	Local government (Kazbegi Mayor)

## 5.1 Key Stakeholder Engagement Findings to Date

From the engagement activities performed, stakeholders identified a number of benefits that they anticipate from the Project, these include the following:

- the new road will be safer;
- travel will be shorter and more comfortable;
- more opportunities for local livelihoods such as selling woven socks and other produce;
- more opportunities for local hotels and restaurants;
- development of tourism and income generating activities;
- more employment for the local population;
- access to villages all year round;
- more people will decide to live permanently in these villages;
- better access to health, education, markets and other facilities;
- availability of public transport; and
- promotion of overall economic and social development of the project area, especially in villages.

The engagement events also provided important feedback on project issues from the perspective of affected communities and interested stakeholders. Table 4, synthesizes these into 13 key issues, of which nine were raised in multiple consultations. They range from social and environmental issues such as the impact of the Project on cultural heritage sites and on local biodiversity, to challenges with land registration and questions about compensation.

In recent months, the project team has been working to, and will continue to, address all of these issues. Some of the issues raised have been addressed by providing more detailed information (for example on project alignment alternatives) while others require additional mitigation measures. For example, the inclusion of a Cultural Heritage Monitor as an EIA mitigation measure to ensure cultural heritage sites are not affected by construction. These, and other actions are also summarized in Table 4. For further detail on the consultation events and issues raised and topics discussed, see **Appendix B**.

**Table 4: Key Issues and Responses from Stakeholder Engagement to Date**

Main issues raised	Relevant events*	Issues raised by	Initial clarifications/responses	Project actions in response to engagement	EIA reference
<b>1. Impact of the Project on cultural monuments such as graves, shrines, churches</b>	6, 7, 8, 10, 12, 13, 14, 32	Residents from Kvesheti, Kobi, and Almasiani, Representative of the Georgia Tourism Association	According to the project design, cultural monuments will not be damaged during construction and the National Agency for Cultural Heritage Preservation of Georgia is collaborating with the project to ensure this.	<ul style="list-style-type: none"> <li>The engineer will employ a Cultural Heritage Monitor to be onsite during topsoil stripping and initial earthworks in high sensitivity areas identified in the EIA.</li> <li>Specific vibration monitoring will be undertaken near identified cultural heritage sites to ensure there are no impacts</li> <li>A “chance find” procedure has been developed for all cultural heritage and will be implemented by the Contractor.</li> </ul>	PCR in the Project area identified in <b>Section E.4.5 - PCR</b> . Impacts to PCR, cemeteries, and specific monuments (e.g. St George cross and soldier’s monument near Kobi) are addressed in <b>Section F.8.7 – PCR</b> and <b>Section F.7.5 – Spoil Disposal</b> . Supervision of the works by a Cultural Heritage Monitor is foreseen as per <b>Section F.8.7 – PCR</b> . Chance Find covered in <b>Annex E/</b>
<b>2. Impact of the Project noise and vibration on households</b>	6, 7, 11, 14, 22	Residents from Kvesheti, Begoni Plateau villages, Arakhveti, Zakatkari, and Mleta	Vibration and noise impacts, and mitigation measures are part of the EIA process. Compensation will be provided in case of construction-caused damage. Pre-construction, RD will do property inventories as necessary.	<ul style="list-style-type: none"> <li>Vibration: Pre-construction surveys will be conducted for all properties &lt;50m from the new road to identify potential vibration impacts during construction.</li> <li>Appropriate mitigation actions and compensation will occur. The Contractor will also monitor vibration onsite,</li> </ul>	Impacts of vibration and the requirements for pre-construction surveys included in <b>Section F.8.6 – Vibration</b> . Noise impact modelling and mitigation provided in <b>Section F.8.5 – Noise</b>

Main issues raised	Relevant events*	Issues raised by	Initial clarifications/responses	Project actions in response to engagement	EIA reference
				<p>particularly in sensitive locations where buildings are in poor condition</p> <ul style="list-style-type: none"> <li>Noise: Barriers will be installed to ensure that project standards are met.</li> </ul>	
<b>3.Impact of the Project on protected areas, biodiversity</b>	7, 8, 9, 13, 23, 24, 25, 26, 31, 32, 36, 37	Residents from Kvesheti and Kobi. Representatives from Green Alternative, SABUKO, Tbilisi State University, NACRES, CENN.	No impact expected on protected areas such as the Kazbegi national park and Emerald Network Site. Noted need for further area surveys on bird species such as the Egyptian vulture and the importance of buckthorn. Mitigation actions for potential environmental impacts in the project area, including the Khada valley, addressed in the EIA.	<ul style="list-style-type: none"> <li>Five meetings with NGOs (events 23, 24, 25, 26, 31) held to generate additional information about biodiversity in the area to inform the project’s Biodiversity Action Plan.</li> <li>The Project will employ an Ecological Clerk of Works as well as an International Biodiversity Expert to ensure biodiversity focused mitigation occurs and the BAP is implemented.</li> <li>Engagement with NGOs and government will continue as the project is implemented.</li> </ul>	Migration of animals and birds has been studied in detail as part of <b>Section E.2 – Biodiversity Analysis</b> of protected areas, including the Emerald Network, has been undertaken as part of <b>Section E.2.2 – Protected and Notable Areas</b> and specific impacts for affected species prepared under <b>Section F.6.1 – Habitat and General Ecological Impacts</b> and <b>Section F.6.2 – Notable Species</b>
<b>4.Disposal of project spoil and waste</b>	7, 8, 12, 13, 14, 33	Residents from Kvesheti, Kobi, Almasiani, Mleta, and Arakhveti.	Contractors are obliged to ensure appropriate waste management in accordance with Georgian Law and waste	<ul style="list-style-type: none"> <li>The project team, has confirmed all spoil sites will be located outside of the extended boundary of Kazbegi</li> </ul>	<b>Section B</b> of the EIA discusses proposed spoil disposal sites. <b>Section F.7.5 – Spoil Material</b>

Main issues raised	Relevant events*	Issues raised by	Initial clarifications/responses	Project actions in response to engagement	EIA reference
		Representative from Green Movement of Georgia	management specified in the EIA. The location of spoil sites is guided in the EIA but will be determined by contractors. Spoil can be potentially used for community building needs, such as carparks.	<p>National Park.</p> <ul style="list-style-type: none"> <li>The Project team has discussed with Kazbegi Municipality where spoil can be used for community or municipal purposes as part of the Kobi Development Plan</li> <li>The project team has confirmed there will be no impacts to Cultural Heritage sites from spoil disposal.</li> </ul>	discusses specific impacts and mitigation for spoil disposal, and the potential use of spoil disposal areas for car parking, cafes, market stalls. The issue of waste management is discussed under <b>Section F.7.6 – Waste Management</b>
<b>5.Impact of project on road and other access for potentially affected communities</b>	6, 7, 10, 11, 14, 19, 22	Residents from Kvesheti, Arakhveti, Khada, and Tskere,	New vehicle access roads, crossing points, underpasses, walking pavements will be constructed – traffic will not be hampered and overall access will be maintained or improved for communities, including moving livestock.	<ul style="list-style-type: none"> <li>Based on consultations, additional underpasses have since been included in the design and the Bedoni access road alignment changed to avoid going through the village.</li> <li>The tunnel section at Tskere will be extended to ensure pedestrian access to the cemetery is maintained.</li> </ul>	Access routes are extensively covered in <b>Section B.5.4</b> , and their impacts assessed in <b>Section F.7.9 – Access and Access Roads</b> . Underpasses covered in <b>Section B.4.3</b> .
<b>6.Impact of project on utilities infrastructure</b>	8, 10, 12, 13, 32	Residents from Kobi, Almasiani, Begoni plateau villages, Arakhveti,	The gas pipeline in Kobi won't be moved.		Utilities in the Project area will be managed according to the measures outlined in <b>Section F.7.2 – Social Infrastructure</b> .

Main issues raised	Relevant events*	Issues raised by	Initial clarifications/responses	Project actions in response to engagement	EIA reference
		Kvesheti. Representative of Green Movement of Georgia.			
<b>7.Lack of information about, input into, and consideration of project design alternatives</b>	7, 9, 11, 13, 14, 21, 32, 33, 36,	Residents from Arakhveti, Kvesheti, Mleta, Representatives of Green Alternative, and GeoGraphic, SABUKO, CENN, and an individual activist	RD agreed that there should have been a round of public consultations during feasibility and design stages. Pointed out nine alternatives were assessed in detail and more information will be provided in the final EIA scoping report and final EIA. Geological conditions and geometrical curves important determinant of the project road alignment. Upgrading the existing road to meet requirements was deemed not feasible.	<ul style="list-style-type: none"> <li>In consultation events from no.9 onwards, RD provided more comprehensive information on road alignment selection and the alternatives.</li> <li>The EIA has been strengthened to include justification on the proposed final route and to include more data collected in relation to why upgrading the existing road or using the existing corridor was not feasible.</li> </ul>	Alternatives discussed in detail in <b>Section C - Alternatives.</b>
<b>8.Difficulties with land registration</b>	6, 8, 10, 14, 9, 33, 34	Residents from Arakhveti, Kvesheti, Kobi, Beniani, Begoni Plateau villages, Tskere, Mleta	RD offered to assist individual households in the registration process.	<ul style="list-style-type: none"> <li>RD and the Land Recognition Committee are working together with residents on each case where land registration has been having difficulties. Each case is open for resubmission and further analysis.</li> </ul>	Registration of land ownership is included in <b>Section F.7.4 - Land Use and Natural Resources</b>  <i>(the Land Acquisition and Resettlement plan covers this issue in detail)</i>

Main issues raised	Relevant events*	Issues raised by	Initial clarifications/responses	Project actions in response to engagement	EIA reference
<b>9. Clarity about compensation arrangements for affected households</b>	6, 7, 12, 19, 20, 21, 22	Residents from Kvesehti, Tskere, Beniani, Begoni, Arakhveti,	LARP process is designed to address this and will be in line with the guidelines of ADB and EBRD. Assessments of affected households is being done via private consultations.	<ul style="list-style-type: none"> <li>• APs made aware of compensation allowances through the LARP preparation and to further support, RD and the Land Recognition Committee are working with APs who do not have full documentation, to further access grounds for claims.</li> </ul>	<p>Compensation arrangements are included in <b>Section F.7.4 - Land Use and Natural Resources</b></p> <p><i>the Land Acquisition and Resettlement plan covers this issue in detail</i></p>
<b>10. Project impacts on Khada valley eco-tourism</b>	9	Local activist		<ul style="list-style-type: none"> <li>• Six eco-tourism consultation events subsequently held with the Georgian Eco-Tourism Association (event no. 34) national NGOs: CENN, SABUKO, WWF (36, 37, 38) and the mayors of Dusheti and Kazbegi (events 26 &amp; 27). Broad consensus that the Khada valley has significant eco-tourism development opportunities that the Project could potentially support. As a result, an eco-tourism component of the Project is being planned and consultations for this are ongoing.</li> </ul>	<p>Local livelihood mitigation included in <b>Section F.7.1 - Local Economic and Livelihoods Impacts</b> and <b>Appendix Z</b> for proposed Visitor Center Concept</p>

Main issues raised	Relevant events*	Issues raised by	Initial clarifications/responses	Project actions in response to engagement	EIA reference
<b>11. Impact of construction camps</b>	13	Representative of Green Movement of Georgia	Contractor has the right to determine where the construction camps are placed.	<ul style="list-style-type: none"> <li>Commitment made in EIA and EMP to locate construction camps &gt;500m from residential areas.</li> </ul>	Construction camp management and mitigation measures based on best practice are outlined in <b>Section F.7.8 – Construction Camps, Asphalt Plants, Concrete Batching Plants and Temporary Facilities.</b>
<b>12. Project employment opportunities for potentially affected communities</b>	6		Local population will be given preference for project employment opportunities.	<ul style="list-style-type: none"> <li>Targets have been included in the EIA for local employment with an estimate of 70% being from local labor.</li> </ul>	Conditions for the use of local labour are outlined in <b>Section F.8.2 – Workers Rights and OHS.</b>
<b>13. Road safety for school children</b>	11	Residents from Begoni plateau villages	n/a (focus group discussion)	<ul style="list-style-type: none"> <li>Design of road includes tunnel section in Begoni, reducing risks to resident's children and livestock.</li> <li>The contractor will provide a series of road safety awareness sessions for schools in the Project area.</li> </ul>	The EIA has specific recommendations for the Contractor to provide traffic safety awareness sessions for schools in the Project area – <b>Appendix A – EMP.</b>

\*Event numbers correspond to numbering in Table 3.



## 6.0 STAKEHOLDER ENGAGEMENT PROGRAM

### 6.1 General principles for engagement

The following general principles will govern stakeholder engagement activities:

- The content of documents for public comment will provide accessible and adequate information on the Project, and not create undue fears (regarding potential negative impacts) or expectations (regarding potential positive impacts such as job creation, etc.);
- Written information will be accompanied by visual illustrations and explanations as needed to build understanding of the project;
- The information will be disclosed to stakeholders in Georgian and in a manner that is accessible and culturally appropriate, taking into account vulnerable people;
- Documents to be disclosed by the RD, ADB and EBRD will be provided either in Georgian or in English or, whenever relevant, in both languages;
- If key issues of particular concern arise, workshops may be offered to explain technical processes, assessment techniques, and quality assurance measures to verify results and ensure mitigation procedures are followed; and
- Efforts will be made to explain not only the proposed project and EIA process, but also applicable national laws and legislations, international principles and standards and how the RD will address compliance.

ADB is committed to putting meaningful consultation processes into practice. Meaningful consultation is a process that:

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

#### Provision for the participation of vulnerable groups

Vulnerable groups may be defined as people that by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may experience different or unique effects from the Project than others. RD will ensure that stakeholder engagement activities are accessible to vulnerable groups and will facilitate dedicated engagement activities aimed at vulnerable groups, as required by EBRD PR10.

The following measures will be implemented to enhance the ability of vulnerable stakeholder groups to participate meaningfully in the EIA and project development process:

- Vulnerable groups will be identified during the EIA and LARP processes, through community surveys to confirm census information available from the Government of Georgia.
- Through regular dialogue with community representatives, the RD will ensure that disadvantaged or vulnerable persons and groups are identified and included in the Stakeholder Register; and

- Staff will identify consultation approaches and activities that will support effective engagement of vulnerable persons. Engagement may be facilitated through open (community wide meetings) and selective methods (targeted engagement):
  - Provision of transport to meetings,
  - Hosting engagement activities in central accessible locations or multiple locations to reduce travel distance,
  - Meeting with vulnerable households individually on a regular basis. Where individuals or households are not fluent in Georgian, provide an interpreter at the meeting.
  - Ensuring vulnerable groups have access to methods of providing feedback to the RD and receiving information that do not require travel.
- Evaluation of the effectiveness of engagement methods will be tracked through indicators such as number of identified vulnerable individuals / groups participating or attending engagement activities.

### Engagement methods

Different engagement methods will be used throughout the project lifecycle to facilitate outreach to and participation of all stakeholders that have an interest in the project. A detailed description of the methods that will be used is provided in **Appendix C**.

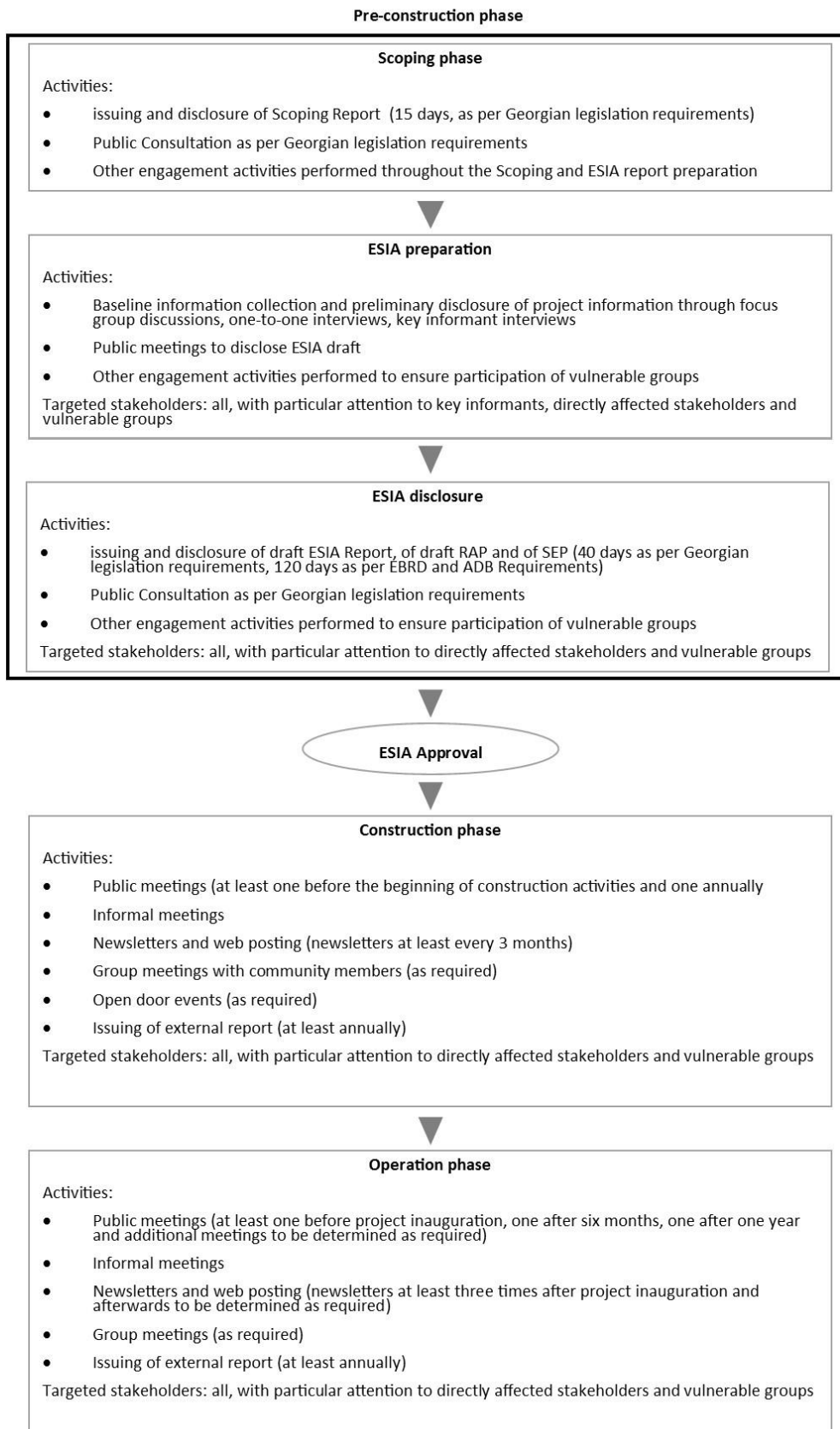
## 6.2 Implementation of activities

Engagement activities will be implemented by the RD during the EIA process, and construction and operation phase. The frequency, scope and method of engagement will vary depending on the stage of the project, as described below. Key roles and responsibilities in implementing the Project's stakeholder engagement program are described in Section 8.

Implementation of the stakeholder engagement program includes the following project phases and sub phases:

- Pre-construction phase
  - Scoping phase
  - EIA preparation phase
  - EIA disclosure phase
- Construction phase
- Operation phase.

A program of activities to be implemented during each phase is outlined in Figure 2 and described in the sections below.



**Figure 2: Diagram of program of activities**

## 6.2.1 Disclosure of documents

Table 5 presents documents to be disclosed during each project phase and disclosure method to be used.

**Table 5: Documents to be disclosed throughout the engagement phases**

Project phase	Document disclosure	Methods of disclosure
Pre-construction: Scoping phase	<ul style="list-style-type: none"> <li>Scoping report</li> </ul>	<p>Electronic version published on the following websites:</p> <ul style="list-style-type: none"> <li>Road Department (<a href="http://www.georoad.ge/?lang=geo">http://www.georoad.ge/?lang=geo</a>)</li> </ul>
Pre-construction: national EIA disclosure phase	<ul style="list-style-type: none"> <li>National EIA report, including Non-Technical Summary and Environmental and Social Management Plan;</li> </ul>	<p>Electronic version will be published on the following websites:</p> <ul style="list-style-type: none"> <li>Ministry of Environment (<a href="http://www.moe.gov.ge/en/home">http://www.moe.gov.ge/en/home</a>)</li> <li>Road Department (<a href="http://www.georoad.ge/?lang=geo">http://www.georoad.ge/?lang=geo</a>)</li> </ul> <p>Hard copy will be accessible at:</p> <ul style="list-style-type: none"> <li>Head Office of the Kazbegi and Dusheti municipality,</li> </ul> <p>Hard copies will be available upon request at no cost:</p> <ul style="list-style-type: none"> <li>For Village representatives</li> <li>During public meetings.</li> </ul> <p>In addition, Frequently Asked Questions and project Factsheet documents will be available digitally and in hard copy, in Georgian.</p>
Pre-construction: International EIA disclosure phase	<ul style="list-style-type: none"> <li>International EIA report, including Non-Technical Summary and Environmental and Social Management Plan;</li> <li>Resettlement Framework;</li> <li>Stakeholder Engagement Plan.</li> </ul> <p>In addition, the EBRD will disclose the Environmental and Social Action Plan (ESAP).</p>	<p>Electronic version will be published on the following websites:</p> <ul style="list-style-type: none"> <li>EBRD for 120 days (EIA Report) (<a href="https://www.ebrd.com/esia.html">https://www.ebrd.com/esia.html</a>)</li> <li>ADB for 120 days (<a href="https://www.adb.org/projects/51257-002/main#project-documents">https://www.adb.org/projects/51257-002/main#project-documents</a>)</li> </ul>
Project construction	<ul style="list-style-type: none"> <li>LARP;</li> <li>SEP in the most updated version;</li> <li>Newsletters and web postings;</li> </ul>	<p>All documents will be posted in electronic version on the following website:</p> <ul style="list-style-type: none"> <li>Road Department (<a href="http://www.georoad.ge/?lang=geo">http://www.georoad.ge/?lang=geo</a>)</li> </ul>

Project phase	Document disclosure	Methods of disclosure
	<ul style="list-style-type: none"> <li>■ External reports, as described in section 9.2.2;</li> <li>■ Newsletters and web postings;</li> <li>■ Community programs (if available).</li> </ul>	<p>A hard copy of all documents will be provided to the executive body and/or representative body of the Kazbegi and Dusheti municipality.</p> <p>In addition, hard copies will be made available at no fee upon request and during public meetings.</p> <p>Newsletters and reports will be made available to all stakeholders involved in engagement activities (through email/'project desks' in the municipalities and other means).</p>
Project operation	<ul style="list-style-type: none"> <li>■ External reports, as described in section 9.2.2;</li> <li>■ Newsletters and web postings;</li> <li>■ Community programs (if available).</li> </ul>	<p>All documents will be posted in electronic version on the following website:</p> <ul style="list-style-type: none"> <li>■ Road Department (<a href="http://www.georoad.ge/?lang=geo">http://www.georoad.ge/?lang=geo</a>)</li> </ul> <p>A hard copy of all documents will be provided to the executive body and/or representative body of the Kazbegi and Dusheti municipality.</p> <p>In addition, hard copies will be made available at no fee upon request and during public meetings.</p> <p>Newsletters and reports will be sent via mail and e-mail to all stakeholders involved in engagement activities.</p>

## 6.2.2 Pre-construction phase

### 6.2.2.1 Scoping phase

In compliance with the requirements of Georgian legislation, following the submission of the Scoping Report, two public consultation meetings were held by the Ministry of Environment to provide information about the outcomes of the report and to collect feedback from stakeholders. The first meeting was held in the morning of July 10, 2018 at the administrative unit of Kvesheti village, in Dusheti municipality.

The second meeting was held in the afternoon of July 10, 2018 at the administrative unit of Kobi village, in Kazbegi municipality. Further information on these meetings is presented in Table 4.

### 6.2.2.2 EIA preparation phase

During the EIA preparation phase, stakeholder engagement is important to collect baseline information, to start informing stakeholders about the project, about potential impacts and mitigation measures, as well as to collect feedback and concerns on the project. In addition to disclosing project information, the aim of activities

performed during this phase is to prepare a sound impact assessment report that is based on primary information and that addresses concerns raised by the local community.

The outline of the activities performed during this phase has been presented in Table 4.

### **6.2.2.3 EIA disclosure phase**

The objective of stakeholder engagement during the EIA disclosure phase is to inform the public on impact assessment findings and associated management plans. Public meetings for the disclosure of the National EIA according to the requirements of the Georgian Legislation were performed on December 10<sup>th</sup> 2018 in Kobi and Mleta, as indicated in Table 3. Engagement during this phase has been conducted in line with the requirements of the Georgian legislation, and those of the ADB and EBRD, as described in Section 3.

During this phase stakeholder have been informed about the presence of a Grievance Redress Mechanism and on the procedure to be followed to submit a grievance.

Key activities implemented during the EIA disclosure phase are summarised in the table below:

**Table 6: Program of engagement activities during the EIA disclosure phase**

Stakeholders	Engagement Method	Information to be disclosed	Schedule / Frequency
All stakeholders	Open public consultation meeting, as per Georgian legislation requirement	Disclosure of National EIA	Performed on December 10 <sup>th</sup> 2018 in Kobi and Mleta.
Vulnerable households identified through EIA, particularly those that are unable to participate in public meetings	One-to-one interviews as needed	Disclosure of EIA with focus on household impacts and mitigation measure identified.	Shortly after the first public consultation / Once per HH as needed
Environment interest group(s) e.g. Stepantsminda Institute of Alpine Ecology of Ilia State University, WWF, CENN and more	KIIs / small group interview	Disclosure of EIA with focus on environmental issues and relative mitigation measures identified.	Shortly after the first public consultation / Once, additional meetings on an as needed basis
Tourism, business and local development interest group(s)	KIIs / small group interview	Disclosure of EIA with focus on local development opportunities and relative enhancement measures identified.	Shortly after the first public consultation / Once, additional meetings on an as needed basis
All stakeholders that during previous engagement activities have expressed the interest in participating in further consultation	KIIs / small group interview	Disclosure of EIA with focus on environmental issues and relative mitigation measures identified.	Shortly after the first public consultation / Once, additional meetings on an as needed basis

### 6.2.3 Construction phase

Engagement activities during pre-construction and construction are particularly important, as this is the phase when impacts will peak and hence a proactive communication engagement channel must be kept open with stakeholders. Engagement will continue throughout this phase with periodic activities at regular intervals, as summarised in the table below:



**Table 7: Program of activities to be performed during the project construction phase**

Stakeholders	Engagement Method	Information to be disclosed	Schedule / Frequency
All stakeholders, special provisions will be made for the participation of vulnerable groups	Open public consultation meeting	Description of activities and of schedule, presentation of EPC contractor, update on progress of activities and of monitoring measures. Information on Health and Safety aspects and emergency plans during construction will be provided.	Once before the commencement of construction activities of each lot. Additional public consultations to be organised if deemed necessary. If possible, consultation meetings should be held in spring/summer months, when most of the population is present
Vulnerable groups and other project affected people	Periodic meetings	Update on progress of project activities and of monitoring activities	To be determined as required, on a needs basis
Governors of Dusheti and Kazbegi	Periodic meetings	Update on progress of project activities and of monitoring activities	To be determined as required, indicatively on a quarterly basis
Environment interest group(s) e.g. Stepantsminda Institute of Alpine Ecology of Ilia State University, WWF, CENN and more	KIIs / small group interview	Update on progress of project activities and of monitoring activities	Shortly after the beginning of construction activities and at least annually
Tourism, business and local development interest group(s)	KIIs / small group interview	Update on progress of project activities and of monitoring activities	Shortly after the beginning of construction activities and at least annually
All stakeholders that during previous engagement activities have expressed the interest in participating in further consultation	KIIs / small group interview	Update on progress of project activities and of monitoring activities	Shortly after the beginning of construction activities and at least annually
All stakeholders, particularly those interested in technical aspects of the	Open Door Events	Opportunity to see in first person how construction activities are carried out	To be determined as required, indicatively on a semester basis

Stakeholders	Engagement Method	Information to be disclosed	Schedule / Frequency
project (students, universities, associations of professionals etc.)		and what techniques are used (particularly for the tunnel construction).	
All stakeholders that have been involved in engagement activities and that are on the mailing list	Newsletter and web posting	Regular updates on progress of activities, changes to schedule and outcomes of monitoring activities and of Grievance Mechanism. Newsletter to be sent in electronic version and in hard copy for those that do not have e-mail addresses. In addition to be posted on the RD website.	Newsletters to be issued every three months, web posting as required when there is news worth sharing
All stakeholders that have been involved in engagement activities and that are on the mailing list	External reports, as described in section 9.2.2	Regular updates on progress of activities, changes to schedule and outcomes of monitoring activities. External report to be sent in electronic version and in hard copy for those that do not have e-mail addresses. In addition to be posted on the RD website.	Once every six months

## 6.2.4 Operation phase

During the operation phase stakeholder engagement will be important particularly during the two-year defect liability period once the road is operational. This is the period when stakeholders will start perceiving impacts and possible concerns might arise. If no particular problems seem to emerge after the first year, the intensity of stakeholder engagement activities can be reduced however at least one report should be issued annually and stakeholder should always be informed on the point of contact to get in touch with the RD.

Key activities during the operation phase are summarised in the table below:

**Table 8: Program of activities during the operation phase**

Stakeholders	Engagement method	Information to be disclosed	Schedule / Frequency
All stakeholders, special provisions will be made for the participation of vulnerable groups	Open public consultation meeting	Description of main impacts expected during the operation phase and of mitigation/monitoring measures implemented.	Once before the inauguration, once after six months and once after one year. Afterwards on an as-needed basis. If possible, consultation meetings should be held in spring/summer months, when most of the population is in the project area
Vulnerable households identified through EIA, particularly those that are unable to participate in public meetings	Periodic meetings	Description of main impacts expected during the operation phase and of mitigation/monitoring measures implemented.	To be determined as required, on an as-needed basis
Governors of Dusheti and Kazbegi	Periodic meetings	Disclosure of information on outcomes of monitoring measures.	To be determined as required, indicatively on a quarterly basis for the first year and then on an as needed basis.
Environment interest group(s) e.g. Stepantsminda Institute of Alpine Ecology of Ilia State University, WWF, CENN and more	KIIs / small group interview	Disclosure of information on outcomes of monitoring measures.	Shortly after the first public consultation / Once, additional meetings on an as needed basis
Tourism, business and local development interest group(s)	KIIs / small group interview	Disclosure of information on outcomes of monitoring measures.	Shortly after the first public consultation / Once, additional meetings on an as needed basis
All stakeholders that have been involved in engagement activities and that are on the mailing list	Newsletter and web posting	Regular updates on progress of activities, changes to schedule and outcomes of monitoring activities.	Newsletters to be issued every three months during the first year of operation, further issues to be

Stakeholders	Engagement method	Information to be disclosed	Schedule / Frequency
		<p>Newsletter to be sent in electronic version and in hard copy for those that do not have e-mail addresses. In addition to be posted on the RD website.</p>	<p>determined. Web posting as required when there is news worth sharing</p>
<p>All stakeholders that have been involved in engagement activities and that are on the mailing list</p>	<p>External reports, as described in section 9.2.2</p>	<p>Regular updates on progress of activities, changes to schedule and outcomes of monitoring activities. External report to be sent in electronic version and in hard copy for those that do not have e-mail addresses. In addition to be posted on the RD website.</p>	<p>At least annually for the first two years of operation, then on an as needed basis</p>

## 7.0 GRIEVANCE MECHANISM

### 7.1 Purpose and Scope

The Grievance Mechanism is the key tool that allows stakeholders to provide feedback, concerns and complaints related to the project. The Grievance Mechanism aims at demonstrating responsiveness to stakeholder needs and at facilitating a trustworthy and constructive relationship with the stakeholders, by developing appropriate mitigation strategies.

The objectives of the grievance mechanism are to:

- provide affected people with culturally appropriate ways and means of stating their grievances during the course of the project (from site preparation to decommissioning phase);
- ensure that grievances are treated confidentially and are not shared outside the process;
- establish a transparent and mutually respectful relation with communities;
- ensure that corrective actions are identified and taken;
- verify that affected people are satisfied with the corrective actions taken
- avoid the need for judicial actions; the grievance mechanism however does not prevent stakeholders from accessing the Georgian judiciary system.

The grievance mechanism will be in place through the entire project cycle. This mechanism refers to external grievances coming from all Stakeholders; it does not apply to the following grievances:

- Grievances coming from workers directly or indirectly employed on the Project: workers' grievances are to be addressed and managed through a similar procedure that will be specifically set up.

### 7.2 Georgian Regulations

The Administrative Code of Georgia defines procedures for issuing and enforcing administrative acts in relation to complaints. It is the legal document defining the rules and procedures for the grievance review and resolution.

According to the law, the Administrative body receiving officially lodged claims is obliged to review the claims and engage the claimant in the grievance review and resolution process, and issue final decision in that regard.

Clause 181. defines the content and the grievance submission forms. In particular, the grievance package should include: a) Name of the administrative body to whom the complaints are addressed; b) Name, address and contact details of the claimant; c) Name of the administrative body, who's decisions or administrative acts are the subject of complain; d) Name of the administrative act or decision, which is subject of complain; e) Content of the claim; f) The context and facts, based on which the complaint is substantiated; g) list of attachments

Clauses 194 and 198 define the rules and procedures ensuring participation of the claimants in the grievance review process.

According to the clause 202, the decision issued by the Administrative Body in relation with the reviewed claim has a status of individual administrative legal act.

The standard period given for the issuance of the decision in relation with the grievance is 1 month.

### 7.3 Grievance mechanism process

Stakeholders will have the right to file complaints and/or queries on any aspect of the Project, including land acquisition and resettlement and may appeal any decision, practice or activity related to them. The RD will ensure that grievances and complaints on any aspect of the Project are addressed in a timely and effective manner.

Project GRM's objectives are to:

- reach mutually agreed solutions satisfactory to both, the Project and the PAPs, and to resolve any grievances locally;
- facilitate the smooth implementation of the EIA, particularly to cut down on lengthy litigation processes and prevent delays in Project implementation;
- facilitate the development process at Project-level, while maintaining transparency as well as establish accountability to the affected people.

Project Affected People (PAPs) were fully informed of their rights and of the procedures for addressing complaints whether verbally or in writing during EIA and LARP consultations and surveys, and will be informed again during the time of compensation and prior to the start of Project works (by the Contractor).

Care will be taken to prevent grievances rather than going through a redress process. This can be obtained through careful design and implementation of the LARP and EIA, by ensuring full participation and consultation with the PAPs and by establishing extensive communication and coordination between the affected communities, the Executing Agency, and local governments in general during the Construction phase (including monthly community meeting with the Contractor and local communities). If the issues cannot be resolved through this basic channel, the complaints and grievances will be addressed through the process described below.

- Village or Municipal level, Grievance Redress Committee (GRCE)
- National level, Grievance Redress Commission (GRCN)

According to the Georgia legislation, a Grievance Redress Committee (GRCE) and a Grievance Redress Commission (GRCN) are established for the entire duration of the project for the resolution of grievances involved in the grievance mechanism.

The GRCE is an informal, project-specific grievance redress mechanism established to administer grievances at Stage 1. This informal body is established at the community level in each affected municipality (village/community authority). The GRCE includes representatives of municipal Land Acquisition and Resettlement (LAR) teams and local communities. The RD representative in the municipal LAR team coordinates the GRCE formation. He/she is responsible for the coordination of GRCE activities and organizing meetings (conveyor). In addition, GRCE comprises the village Rtsmunebuli or his/her representative, representatives of APs, women APs, and appropriate local NGOs to allow the voices of the affected communities to be heard and ensure a participatory decision-making process.

The GRCN is formed by the order of the Head of the RD as a permanent and functional informal structure, engaging personnel of RD from all departments to work on LAR issues and complaint resolution. This includes the top management of the RD, safeguard or LAR units, legal other relevant departments (depending on the specific structure of the IA). The GRCN is involved in Stage 2 of the grievance resolution process. The order states that if necessary, a representative of local authorities, NGOs, auditors, APs and any other persons or entities can be included in the Commission as its members.

GRCEs were established at the municipality level for the Project with an office order from the RD.

The GRCE for the Kazbegi municipality will be based in Kobi.

**Table 9: GRCE at Kazbegi Municipality**

Name	Position	Telephone/email	Status
Shota Batsikadze	Representative of Resettlement Division at RD	577613302	Conveyor; Contact person
Archil Jorbenadze	Representative of LAR Commission (GRCN) of RDMRDI	591403038	Member
Givi Chkareuli	Representative of Mayor in Kobi village	598240334	Member Secretary
Kakha Chopikashvili	Representative of Kobi village in Sakrebulo of Kazbegi municipality	595555918	Member
Artur Abaev	Representative of APs	555446125	Member
Fatima Koblova	Representative of Kobi population	599567894	Member

The GRCE for Dusheti Municipality will be based in Kvesheti.

**Table 10: GRCE at Dusheti Municipality**

Name	Position	Telephone/email	Status
Shota Batsikadze	Representative of Resettlement Division at RD	577613302	Conveyor; Contact person
Archil Jorbenadze	Representative of LAR Commission (GRCN) of RDMRDI	591403038	Member
Tengiz Bedoidze	Representative of Mayor in Kvesheti	551102790	Member
Ketevan Kakhurashvili	Elected Representative of Kvesheti village	591113462	Member
Ushangi Zakaidze	Representative of APs	595012903	Member
Vasiko Burduli	Representative of Kvesheti population (Male)	597212120	Member
Marta Mezvrishvili	Representative of Kvesheti population (Female)	555916273	Member



The Grievance Redress Commission with the order N224, was established at the RD level as a permanent GRM structure. It consists of 20 permanent members of the Commission, 2 secretaries and 3 non-permanent members without right of vote. The list of the members is presented in the following table:

**Table 11: Grievance Redress Commission (GRCN)**

No	Name of Member	Position
1	Irakli Karseladze	Head of the Commission
2	Aleksandre Tevdoradze	Deputy Head of the Commission
3	Levan Kupatashvili	Member
4	Giorgi Tsereteli	Member
5	Koba Gabunia	Member
6	Salome Tsurtsumia	Member
7	Pikria Kvernadze	Member
8	Davit Sajaia	Member
9	Giorgi Eragia	Member
10	Nodar Agniashvili	Member
11	Mikheil Ujmajuridze	Member
12	Nino Mtsuravishvili	Member
13	Gia Sopadze	Member
14	Akaki Mshvidobadze	Member
15	Davit Kaladze	Member
16	Davit Getsadze	Member
17	Pavle Gamkelidze	Member
18	Girogi Tsagareli	Non-permanent member of commission
19	Mariam Begiashvili	Non-permanent member of commission
20	Archil Jorbenadze	Non-permanent member of commission

## 7.4 GRM Staff Roles and Responsibilities

A representative of the resettlement service of the RD is responsible for coordination of the Committee's work and at the same time, he/she is nominated as a Contact Person who receives the grievances and handles the grievance logbook. The local authorities at the municipal level, the civil works Contractor, the Supervising

Company (Engineer), as well as APs (through informal meetings) are informed about the Contact Person and his contact details are available in the offices of all mentioned stakeholders.

The Contact Person collects and records the grievances, informs all members of the Committee and the management of RD about the essence of the problem, engages the relevant stakeholders in discussions with the applicant of grievance and handles the process of negotiation with AP at the stage 1 of the grievance resolution. The Contact Person prepares the minutes of meetings and ensures signatures. In case the grievance is resolved at the stage 1, the Contact Person records the fact of closing the grievance in his logbook and informs RD management about this in writing.

If the complainants are not satisfied with the GRCE decisions, they can always use the procedures of Stage 2 of grievance resolution process. In that case, the Contact Person helps the PAP in lodging an official complaint (the complainant should be informed of his/her rights and obligations, rules and procedures of lodging a complaint, format of complaint, terms of complaint submission, etc.).

The PAPs were informed about the available GRM. This was achieved through implementing information campaigns, distributing Project information brochure, keeping all focal points up-to-date & maintaining regular communication with them, allowing multiple entry points for complaints and introducing forms for easier reporting of complaints.

The grievance mechanism process entails four steps, briefly described in the table below. A full description of the process can be found in the EIA, in the Resettlement Framework and in the LARP.

**Table 12: Grievance Mechanism Process**

Steps	Process
Step 1	The complaint is informally reviewed by the focal point at the village level, which takes all necessary measures to resolve the dispute amicably.
Step 2	<ul style="list-style-type: none"> <li>• If the grievance is not solved at the previous level, the municipality level LAR representative will assist the aggrieved APs to formally lodge the grievances with the respective GRCE at the municipality level. The aggrieved APs will lodge the complaint if there is failure of negotiation at the village level and produce documents supporting his/her claim.</li> <li>• The GRCE member secretary will review the complaint and prepare a Case File for a GRCE hearing and resolution. A formal hearing will be held with the GRCE at a date fixed by the GRCE member secretary in consultation with the conveyor and the aggrieved APs.</li> <li>• On the date of the hearing, the aggrieved AP will appear before the GRCE at the village office and produce evidence in support of his/her claim. The member secretary will note down the statements of the complainant and document all procedures.</li> <li>• The decisions will be issued by the conveyor and signed by other members of the GRCE. The case record will be communicated to the complainant by the LAR Team at the village level.</li> </ul> <p>The grievance redress at this stage shall be completed within 4 weeks.</p>
Step 3	If the aggrieved AP is unsatisfied with the GRCE decision at the municipality level, the next option will be to lodge grievances with the Grievance Redress Commission (GRCN) at the Resettlement Division of the RD at the national level within two weeks after receiving the decision from GRCE. The complainants must produce documents supporting his/her claim. The GRCN will review the GRCE hearing records and convey its decisions to the aggrieved APs within four weeks after receiving the complaint.

Steps	Process
Step 4	<p>If the RD decision fails to satisfy the aggrieved APs, they can pursue further action by submitting their case to the appropriate court of law (local courts) without reprisal.</p> <p>The aggrieved AP can take legal action over the amount of compensation or any other issues, e.g. occupation of their land by the contractor without their consent, damage or loss of their property, restrictions on the use of land/assets, environmental concerns such as dust caused by the contractor's machinery, etc.</p>

## 7.5 Visibility and Communication

Prior to start of site works, the Contractor shall:

- Communicate the GRM to communities in the project impact zone.
- Set-up and publicize a 24-hour hotline for complaints;
- Ensure that names and contact numbers of representatives of GRCE, the RD and the Contractor are placed on the notice boards outside the construction site.

## 8.0 SEP ROLES AND RESPONSIBILITIES

### 8.1 Road Department

The **RD** has the ultimate responsibility of implementing the present SEP throughout the overall Project lifecycle.

**RD:** the RD identifies staff and resources for the overall implementation of the stakeholder engagement activities of the Project.

The RD is responsible for:

- Implementing the SEP, by carrying out the activities described throughout the plan;
- Acting as an interface between the RD management, the Project Management and Supervision (PMS) contractor, EPC contractors, subcontractors and stakeholders;
- Monitoring the SEP implementation and for proposing corrective actions and reports to the RD management and to the Lenders.
- Ensuring that this SEP is up to date and appropriate to the nature and scale of the Project;
- Proposing to the RD management, if necessary, amendments and/or updates to this procedure and issuing revisions;

The RD will keep track of all engagement activities performed in a Stakeholder Engagement Activities Register, which will include management forms, minutes of meetings and all relevant material used or prepared for the activity (announcements, posters, brochures, presentations, attendees sheet, pictures, etc.). An example of the register and record forms to be used for the implementation of a Stakeholder Engagement Activities register is presented in **Appendix E**.

**Communication specialist:** an external communication specialist has been hired through ADB to support the RD to conduct activities, such as:

- Assisting the RD in conducting a Stakeholders' Mapping to identify key stakeholders,
- Assisting the RD in developing a draft Communication Strategy and Action Plan including a roadmap;
- Assisting the RD and ADB in facilitating the implementation of the Communication Action Plan

Communication activities are often performed as a support of stakeholder engagement, and likewise outcomes of stakeholder engagement can often provide valuable information for the communication strategy, hence the two activities will be performed in strong coordination.

**Community outreach specialist:** an external community outreach specialist has been hired through ADB, and will support the RD for activities such as:

- Assisting the RD and the communication specialist in conducting a Stakeholders' Mapping;
- Assisting the RD and the communication specialist in implementing the Communication Strategy and Action Plan developed under the project; in addition, the community outreach specialist will apply local knowledge of the country to ensure that all activities are appropriate and culturally sensitive;
- Assisting the RD and other government agencies in planning, conducting, and documenting consultation meetings on the project to ensure interested stakeholders are adequately informed and that the general public understands ADB's role in the project;
- Assisting the RD in compiling all findings and outcomes of consultations and stakeholder engagement meetings in a report to be shared with ADB and relevant government officials, affected people, and any other consultation participants. The community outreach specialist will also coordinate the dissemination of the report ensuring it reaches all relevant stakeholders in a form that is accessible to them;
- Providing overall communication support to the RD and to the project's communication specialist.

Contact details to liaise with the RD will be defined as below:

Address: Georgia 0160, Tbilisi, Kazbegi ave N12,

Phone Number: (995 32) 37-05-08

Email Address: Info@georoad.ge

Corporate website: <http://www.georoad.ge/>

## 8.2 Contractor and Subcontractors

The implementation and update of the SEP is under the responsibility of the RD. Contractors and subcontractors (including the PMS contractor) are not allowed to implement engagement activities directly but have to collaborate with the RD within the framework of the SEP. Likewise, contractors are not allowed to handle grievances, but, if approached by stakeholders on this issue, have to address them to the RD. The RD, the contractors and subcontractors have to liaise regularly to discuss on status of activities and on emerging issues that should be included in engagement activities. The contractors and subcontractors have to report to the RD on a periodic basis regarding general activities progress so that the information can be disclosed to stakeholders during the planned activities.

## 9.0 MONITORING AND REPORTING

The present SEP should be updated upon major project changes and as the project enters a new phase (e.g. when construction ends). Previous versions will be archived, and the revised version will be made available to stakeholders.

### 9.1 Monitoring

The RD will be responsible of keeping track through a specific database of all activities performed within the framework of stakeholder engagement.

In particular, the database will contain:

- Stakeholder register, periodically updated;
- Stakeholder Engagement Activities register, with indication for each activity performed at minimum of date and location, participants, information disclosed and outcomes of the activity;
- Previous SEP versions;
- Periodical reports prepared.

The correct implementation of this SEP will be verified through existing environmental and social auditing/supervision activities undertaken by the RD or the Supervision Engineer and reported by the RD to ADB / EBRD. An indicative list of auditing and supervision activities shall include:

- The correct implementation of this SEP;
- The compliance to the frequency and to the planned schedule of activities indicated in the SEP;
- Timely and effective reporting.

The team shall also examine:

- Review of Stakeholder Engagement Activities register to ensure that record is filled correctly;
- Review of Stakeholder Engagement Activity forms and dossiers to ensure that information and material is filed and registered correctly;
- Review of Stakeholder Register to ensure that the list is continuously updated;
- Review of periodic reports prepared by the RD to ensure that they are compiled correctly
- Levels of stakeholder participation in activities and of stakeholder satisfaction based on the information presented in the “lessoned learned” section of the SEA Record form.

The correct implementation of the Grievance Mechanism will be verified through existing bi-annual environmental and social monitoring arrangements during Project construction and during Project operation for at least the two-year defect liability period.

Internal auditing shall address:

- The correct implementation of the Grievance Mechanism methodology;
- Timely and effective responses to grievances.

During the inspections the audit team shall address in particular:

- Review of database, to ensure that the recording of grievances is entered correctly;

- Random review of 20% (or at least 4) grievance record forms and dossiers to ensure that information and material is filed and registered correctly;
- Review of all record forms and dossiers for grievances falling under categories 3-5 dossiers to ensure that information and material is filed and registered correctly;
- Levels of satisfaction to the Grievance Mechanism effectiveness based on the information presented in the “lessoned learned” section of the Grievance Record form.

The RD management will review the outcomes of the audits and will implement corrective actions, if deemed necessary, to the Grievance Mechanism methodology and to roles and responsibilities.

In addition, an External Monitoring Agency will be appointed to monitor and report on the implementation of the LARP. Full information on the roles and responsibilities of this agency are provided in the LARP.

## 9.2 Reporting

The outcomes of stakeholder engagement activities will be regularly reported both internally and externally.

### 9.2.1 Internal Reporting

With regards to internal reporting, the RD is responsible for liaising with its RD management on a regular and on an as-needed basis, to inform on general progress of the Plan implementation and to seek advice when needed.

In addition, the RD, with the support of the community outreach specialist will prepare formal periodic reports on a three-monthly basis during the construction phase and annually during the operation phase. Reports have to contain the following information:

- Overall data on number and typology of activities performed;
- Attendance and feedback from Stakeholders;
- Problems and critical issues emerged;
- Status of Grievance Mechanism performance and critical issues emerged;
- Corrective actions taken within the Plan and schedule;
- Decisions to be taken with the management;

Reports will be shared with the RD management, with contractors and subcontractors, with Lenders and with any other party deemed necessary.

### 9.2.2 External Reporting

With regards to external communication, the RD must report back to communities within the framework of periodic external communication. The following information will be reported in suitable format:

- Progress on the Project, including statistics, description of phases completed, and milestones planned in the phase;
- Outcomes of environmental monitoring activities;
- Outcomes of Stakeholder engagement activities, with an outline of initiatives carried out and main issues emerged;
- Information and data on grievances (in anonymous form);
- Data on local employment and local procurement (if available).

The report will be issued on a semi-annual basis during the construction phase and on an annual basis during the operation phase for the first five years of operation. The Report will be sent to all Stakeholders involved in previous activities, also if they are no longer active participants and to Lenders. The same version of the report should be posted on the RD's website.

In addition, semi-annual Environmental Monitoring Reports and Social/Resettlement Monitoring Reports will be posted on the RD's and ADB's website during the construction phase as per ADB's SPS requirements.

**APPENDIX A**

# Preliminary list of stakeholders



Preliminary list of Stakeholders

ID number	Stakeholder name	Category
1	Mtskheta-Mtianeti Governor	Regional administration
2	Dusheti Municipality	Municipal administration
3	Kazbegi Municipality	Municipal Administration
4	Governor of Kvasheti Village	Municipal Administration
5	Mountain Forest Development Agency of Georgia	National government and authorities
6	Roads Department of Georgia	National government and authorities
7	Ministry of Environment Protection and Agriculture	National government and authorities
8	Ministry of Regional Development and Infrastructure	National government and authorities
9	Ministry of Culture and Monument Protection	National government and authorities
10	Agency for Protected Areas	National government and authorities
11	National Environmental Agency	National government and authorities
12	Police	National government and authorities
13	National Tourism Administration	National government and authorities
14	Legal Entity of Public Law	National government and authorities
15	Gudauri Ski Resort	Affected businesses
16	Chamber of Commerce	Affected businesses
17	Trade Unions	Affected businesses
18	Gas Transportation Company	Affected businesses
19	Stepantsminda Institute of Alpine Ecology of Ilia State University.	Academia and sector experts
20	Centre for Strategic Research and Development of Georgia (CSRDG)	Academia and sector experts
21	Economic Policy Research Centre (EPRC)	Academia and sector experts
22	Tbilisi State University	Academia and sector experts
23	National Agency for Cultural Heritage Preservation of Georgia	Academia and sector experts
24	WWF Caucasus	NGOs and local associations

25	CENN	NGOs and local associations
26	Greens Movement of Georgia	NGOs and local associations
27	Georgian Greens	NGOs and local associations
28	Green Alternative	NGOs and local associations
29	Georgian Environmental Outlook (GEO)	NGOs and local associations
30	Women in Europe for a Common Future (WECF)	NGOs and local associations
31	Georgian Centre for Biodiversity Conservation and Research (NACRES)	NGOs and local associations
32	Mountain Development Centre (MDC)	NGOs and local associations
33	Society for Nature Conservation - SABUKO	NGOs and local associations
34	Association for Well-being of Society (AWS)	NGOs and local associations
35	Regional Development Center (RDC)	NGOs and local associations
36	Dusheti Development Fund	NGOs and local associations
37	Women for Regional Development	NGOs and local associations
38	Georgian Centre for the Conservation of Wildlife	NGOs and local associations
39	Stefantsminda	NGOs and local associations
40	Georgian Eco-Tourism Association	NGOs and local associations
41	Green Alternative	NGOs and local associations
42	Caucasus Nature Fund	NGOs and local associations
43	Residents of the Almasiani village	Affected communities
44	Residents of the Arakhveti village	Affected communities
45	Residents of the Begoni village	Affected communities
46	Residents of the Beniani village	Affected communities
47	Residents of the Gudauri village	Affected communities
48	Residents of the Gomurni village	Affected communities
49	Residents of the Kobi village	Affected communities
50	Residents of the Kvesheti village	Affected communities

51	Residents of the Mleta village	Affected communities
52	Residents of the Mughere village	Affected communities
53	Residents of the Sviana-Rostiani village	Affected communities
54	Residents of the Tskere village	Affected communities
55	Residents of the Zakatkari village	Affected communities

**APPENDIX B**

**Engagement Activities Performed  
to Date**

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
1	One-on-one meetings (x5)	Village residents of Tetri Aragvi and Khadistskail gorge settlements	Affected communities	4 April 2018, various	Approx. 5	EIA discussions	<ul style="list-style-type: none"> <li>• Gather information on project area's aquatic environment</li> </ul>
2	One-on-one meetings (x5)	Village residents of Natvani, Baidara, and Tergi	Affected communities	11 April 2018, various	Approx. 5	EIA discussions	<ul style="list-style-type: none"> <li>• Gather information on project area's aquatic environment</li> </ul>
3	One-on-one meetings (x8)	Village residents of Tskere, Kobi	Affected communities	19 April 2018, various	Approx. 8	EIA discussions	<ul style="list-style-type: none"> <li>• Gather information on project area's biodiversity</li> </ul>
4	One-on-one meetings (x3)	Village residents of Zakatkari	Affected communities	8 May 2018, Zakatkari	Approx. 3	EIA discussions	<ul style="list-style-type: none"> <li>• Gather information on project area's biodiversity</li> </ul>
5	One-on-one meetings (x6)	Residents of settlements along Kvesheti-Kobi alignment	Affected communities	12 May 2018	Approx. 6	EIA discussions	<ul style="list-style-type: none"> <li>• Gather information on project area's cultural heritage</li> </ul>
6	Public consultation	Village residents of Kvesheti	Affected communities	14 May 2018, Kvesheti	Approx. 16 (15 males, 1 female)	Introduce the project specifications and discuss issues related to	<ul style="list-style-type: none"> <li>• Participants need more information about the road project</li> <li>• Questions from participants on basic project aspects such as scope, size, and potential benefits</li> <li>• Challenges with the land-registration process and</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
						the LARP	<ul style="list-style-type: none"> <li>eligibility to compensation</li> <li>• Interest in employment opportunities</li> </ul>
7	Public consultation	Village residents of Kvesheti, Arakhveti and Khada, NGO representatives	Affected communities and interested stakeholders	10 July 2018, Kvesheti	Approx. 16 (11 males, 5 females)	To disclose the EIA Scoping Report and to collect feedback	<ul style="list-style-type: none"> <li>• General interest in project benefits</li> <li>• Project impacts on building and cultural heritage</li> <li>• Stakeholder engagement in project design and decision-making process</li> </ul>
8	Public consultation	Village residents of Kobi, NGO representatives	Affected communities and interested stakeholders	10 July 2018, Kobi	Approx. 11 (6 females, 5 males)	To disclose the EIA Scoping Report and to collect feedback	<ul style="list-style-type: none"> <li>• Project impacts on protected areas and cultural heritage</li> <li>• Project impacts on utilities and infrastructure</li> <li>• Question whether the project had undergone a Strategic Environmental Protection Assessment</li> </ul>
9	Civil society meeting	NGOs, residents, government representatives	Affected communities, national, regional and local administrations, NGOs and local associations	13 August 2018, Ministry of Environmental Protection and Agriculture, Tbilisi	Approx. 27 (15 males, 12 females)	EIA consultation with civil society experts	<ul style="list-style-type: none"> <li>• More information required on the alternatives analyzed</li> <li>• Project impacts on protected areas</li> <li>• Quality of procedure for the scoping public consultation, and amount of participation</li> <li>• Project impacts on current eco-tourism activities in the Khada valley</li> <li>• Queries about construction techniques particularly for the tunnel</li> </ul>
10	Focus group discussion	Residents of Begoni, Beniani, Gomurni, Sviana-Rostiani, Tskere.	Affected communities	30 August 2018, Begoni Plateau	Approx. 10 (6 males, 4 females)	Land Acquisition and Resettlement planning	<ul style="list-style-type: none"> <li>• Tskere's access to the proposed road</li> <li>• Land registration challenges</li> <li>• Potential for vibration effects on homes during construction/operations of the road</li> <li>• Question on whether the road will have lighting</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
							<ul style="list-style-type: none"> <li>• Impact on the gas pipeline near Kobi during construction phase</li> <li>• Project impacts on identified grazing and hay collection areas, water sources for villages on the plateau</li> <li>• No specific development plans are in place for the Khada valley, although there are state/national level programs to support people who want to develop a business plan</li> </ul>
11	Focus group discussion	Residents of Arakhveti Begoni, and Kvesheti villages	Affected communities	31 August 2018, Arakhveti and Kvesheti	Approx. 11	Land Acquisition and Resettlement planning	<ul style="list-style-type: none"> <li>• Questions on crossing points along the road, particularly for cattle</li> <li>• Questions on service road alignment</li> <li>• Impact on tourism</li> <li>• Project impacts on existing infrastructures (water, telecommunications, etc.)</li> <li>• Request that an upgrade to the sewerage system is performed together with the project</li> <li>• Bedoni village: discussion on access road alignment through the riverbed to avoid using the current road that passes through the middle of the Bedoni village</li> <li>• Road alignment in the Kvesheti village and impacts the project may have on properties and on quality of life in the village</li> </ul>
12	Focus group discussion	Residents of Kobi Almasiani villages	Affected communities	31 August 2018, Kobi	Approx. 8 (6 men, 2 women)	Land Acquisition and Resettlement planning	<ul style="list-style-type: none"> <li>• Impact on St George Cross and the church above it</li> <li>• Discussion about the Soldiers Monument</li> <li>• Impact on gas pipeline alignment during construction</li> <li>• Questions on project schedule</li> <li>• Discussion on possible spoil disposal sites and</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
							<p>when/how these will be decided</p> <ul style="list-style-type: none"> <li>• Development plan is being developed and currently waiting Prime Ministers approval; mainly relates to the ski lift development</li> </ul>
13	Civil society meeting	NGOs, businesses, authority representatives	National government authorities, NGOs, local associations, affected businesses	4 September 2018, Tbilisi	Approx. 28 (17 males, 11 females)	EIA consultation with civil society experts	<ul style="list-style-type: none"> <li>• Questions on geophysical aspects, particularly for the tunnel section</li> <li>• Adequacy of information/details in the EIA Scoping Report and participation challenges</li> <li>• Location of spoil area and construction camps</li> <li>• Request that evaluation of impacts on habitats is performed according to IUCN guidelines</li> <li>• Project impacts on accessibility to cemeteries and cultural monuments</li> <li>• Impacts on current tourism activities and expectations on possible development opportunities</li> <li>• Impacts on archaeological heritage</li> <li>• More information required on the alternatives analysis that has been performed</li> </ul>
14	Public consultation	Residents of Kvesheti, Arakhveti, Benian-Begoni, Kobi, Tskere, and Zaqatkari villages, Representatives of NGOs and	Affected communities, national NGOs, national and local government authorities	7 September 2018, Mleta	Approx. 60	Disclosure of project alignment and alternatives considered	<ul style="list-style-type: none"> <li>• Questions on the alternative analysis performed</li> <li>• Question on the reasons behind the chosen road alignment</li> <li>• Clarifications about land acquisition and compensation</li> </ul>



No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
		government					
15	Expert meeting	Representative from Georgian Center for the Conservation of Wildlife	National NGO	10 September 2018, Tbilisi	1	EIA consultation with civil society	<ul style="list-style-type: none"> <li>• Discussion of community support programs, wildlife information and available data</li> </ul>
16	Expert meeting	Representative from NACRES	National NGO	10 September 2018, Tbilisi	1	EIA consultation with civil society	<ul style="list-style-type: none"> <li>• Discussion regarding status of NACRES conservation programmes, biodiversity in the project area and grounds for delimitation of Emerald network sites</li> </ul>
17	Expert meeting	Representative from MOEPA biodiversity department	National government	11 September, 2018, Tbilisi,	1	EIA consultation with civil society	<ul style="list-style-type: none"> <li>• Discussion about biodiversity in the project area</li> </ul>
18	Expert meeting	Representatives from Caucasus Nature Fund	International NGO	11 September, 2018, Tbilisi	2	EIA consultation with civil society	<ul style="list-style-type: none"> <li>• Discussion regarding CNF activities in Georgia, main issues, plans, ways for cooperation during wildlife monitoring</li> </ul>
19	Public consultation	Residents of Begoni and Beniani villages	Affected communities	14 September 2018, Begoni	Approx. 10 (6 males and 4 females)	Land Acquisition and Resettlement planning	<ul style="list-style-type: none"> <li>• Potential impact of challenges with land registration on compensation entitlements</li> <li>• Impacts on agricultural activities</li> <li>• Interest in potential economic benefits</li> </ul>
20	Public consultation	Residents of Tskere village	Affected communities	14 September 2018, Tskere	Approx. 4 (3 females, 1 male)	Land Acquisition and Resettlement	<ul style="list-style-type: none"> <li>• Interest in the project due to the accessibility benefits that it would bring to the village</li> <li>• Difficulties registering land</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
						planning	
21	Public consultation	Residents of Kvesheti village	Affected communities	15 September 2018, Kvesheti	Approx. 25 (20 males, 5 females)	Land Acquisition and Resettlement planning	<ul style="list-style-type: none"> <li>• Some residents commented the road should be built on the other side of the river</li> <li>• Some opposition to the project due to potential impacts on properties and houses</li> <li>• More information on project design alternatives required</li> </ul>
22	Public consultation	Residents of Zakatkari village	Affected communities	15 September 2018, Zakatkari	Approx. 6 (4 males, 2 females)	Land Acquisition and Resettlement planning	<ul style="list-style-type: none"> <li>• Issues around land acquisition and resettlement process and eligibility criteria</li> <li>• Access benefits of the new road</li> </ul>
23	Expert meeting	Georgian Centre for Biodiversity Conservation and Research (NACRES) representative	National NGOs	26 September 2018, Tbilisi	2	Gather baseline data and information on project area biodiversity	<ul style="list-style-type: none"> <li>• Provided information on NACRES' work</li> <li>• NACRES offered to support the biodiversity aspects of the project and valued the biodiversity assessment work done thus far</li> </ul>
24	Expert meeting	Georgian Centre for the Conservation of Wildlife representative	National NGOs	26 September 2018, Tbilisi	2	Gather baseline data and information on project area biodiversity i	<ul style="list-style-type: none"> <li>• Provided information about KfW-supported protected area project involving Kazbegi National Park</li> <li>• Highlighted issues between local people and protected area development due to strict controls impacting livelihoods</li> </ul>
25	Expert meeting	Caucasus Nature Fund (CNF)	International NGOs	28 September 2018, Tbilisi	3	Gather baseline data and information on	<ul style="list-style-type: none"> <li>• Provided information on CNF work and issues relevant to Kazbegi National Park such as poaching, land use zoning, and tourism</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
		representatives				project area biodiversity	<ul style="list-style-type: none"> <li>• CNF raised questions about the project regarding impacts on Khada valley, alternative options to the proposed road, and ongoing freight transport issues and transport pollution</li> </ul>
26	Expert meeting	Biodiversity and Forest Department, MoEPA representative	National Government	28 September 2018, Tbilisi	2	Gather baseline data and information on project area biodiversity	<ul style="list-style-type: none"> <li>• Provided information expansion plans for Kazbegi National Park and plans for the Emerald Network</li> <li>• Commented the road project impacts likely relatively benign, but pointed out impacts on sea buckthorn areas need to be avoided</li> </ul>
27	Focus group discussion	Women from Kvesheti	Affected communities	16 October 2018, Kvesheti	n/a	LARP discussions	n/a
28	Focus group discussion	Women from Tskere	Affected communities	16 October 2018, Tskere	n/a	LARP discussions	n/a
29	Focus group discussion	Women from Beniani-Begoni	Affected communities	16 October 2018, Beniani Begoni	n/a	LARP discussions	n/a
30	Focus group discussion	Women from Kobi	Affected communities	17 October 2018, Kobi	/na	LARP discussions	n/a
31	Expert meeting	SABUKO representative	National NGOs	16 November 2018, Tbilisi	2	Gather baseline data and information on project area biodiversity	<ul style="list-style-type: none"> <li>• Provided information on SABUKO work in the area</li> <li>• Emphasized that the endangered Egyptian vulture is in the project area</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
32	Public consultation	Residents of Kobi village, representatives of SABUKO, Green Alternative, Mountain Development Center	Affected communities and interested stakeholders	10 December 2018, Kobi	Approx. 17 (11 males, 6 females)	Disclose the National EIA	<ul style="list-style-type: none"> <li>• Potential impact of construction to nearby shrines</li> <li>• Higher involvement of communities in assessment phase, ie for cultural heritage sites in the area</li> <li>• Questions asked and answered regarding alternative options to the Khada valley bypass</li> <li>• Total cost of the project</li> </ul>
33	Public consultation	Residents of Mleta Bedoni, Arakhveti, Kvesheti village, representatives of 5 NGOs	Potentially affected and interested stakeholders	10 December 2018, Mleta	Approx. 29 (18 males, 11 females)	Disclose the National EIA	<ul style="list-style-type: none"> <li>• Technical questions raised about geo-engineering aspects and the disposal of construction spoil</li> <li>• Positive comment on the quality of the EIA</li> <li>• Issues with the land registration process</li> </ul>
34	Public consultation	Residents of Begoni, Arakhveti, Kvesheti villages, local government,	Potentially affected stakeholders, local government	9 January 2019, Mleta	30	Public hearing on the LARP	<ul style="list-style-type: none"> <li>• Generally positive and constructive</li> <li>• Issues with the land registration process.</li> </ul>
35	Expert meeting	Georgian Eco-Tourism Association	National NGO	30 January 2019, Tbilisi	5	Discussions on potential eco-tourism component of project	<ul style="list-style-type: none"> <li>• Information provided on the Association's work</li> <li>• Agreed that the Khada valley has considerable eco-tourism potential</li> <li>• Comment that more analysis needed than in the EIA to assess socio-economic and cultural heritage aspects to</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
							<p>plan appropriate and sustainable tourism activities</p> <ul style="list-style-type: none"> <li>• Suggested no need for another tourist center</li> </ul>
36	Expert meeting	CENN	National NGO	1 February 2019, Tbilisi	12	Discussions on potential eco-tourism component of project	<ul style="list-style-type: none"> <li>• Commented that upgrading the existing road is the preferable option as concerns over the impacts on the Khada valley</li> <li>• Another meeting earmarked to discuss more in depth the technical reasons why upgrading the existing road not feasible</li> </ul>
37	Expert meeting	SABUKO	National NGO	1 February 2019, Tbilisi	6	Discussions on potential eco-tourism component of project	<ul style="list-style-type: none"> <li>• Commented that the EIA assessment of bird biodiversity data needed more work and offered to provide more data</li> <li>• Agreed that eco-tourism activities had good potential, but must be community-based and involve capacity building support</li> </ul>
38	Expert meeting	WWF	International NGO	1 February 2019, Tbilisi	10	Discussions on potential eco-tourism component of project	<ul style="list-style-type: none"> <li>• Quite positive about the project and the potential eco-tourism benefits for the area</li> <li>• Offered to collaborate on the biodiversity action plan for the project</li> </ul>
39	Meeting	Mayor of Dusheti	Local government	4 February 2019, Dusheti	8	Discussions on potential eco-tourism component of project	<ul style="list-style-type: none"> <li>• Mayor highlighted Khada valley tourism development desirable and good potential, but so far constrained by seasonality and lack of infrastructure</li> <li>• Welcomed the proposed Gudauri access road initiative of the project and also the potential of a tourist visitor center supported by the project.</li> </ul>

No.	Engagement Activity	Participants	Stakeholder category	Date and location	No. of participants	Purpose of Engagement	Topics discussed and issues raised
40	Meeting	Mayor of Kazbegi	Local government	4 February 2019, Stepantsminda	8	Discussions on potential eco-tourism component of project	<ul style="list-style-type: none"> <li>• Mayor said municipality/residents very supportive of the project as current road has major problems that impact tourism</li> <li>• Interested in project support for tourism initiative on Kobi side of the project area.</li> </ul>

**APPENDIX C**

**Outline of Engagement Methods  
to be Used**

This Appendix describes the methods that will be used throughout the stakeholder engagement process and identifies how they will be used in the different phases of the Project development. Each activity allows to reach specific engagement objectives and to engage with different groups of stakeholders, implying various commitment levels from the RD. How these activities are to be implemented throughout the different project phases is described in Section 6.2 of this report.

It is advised that the planned Stakeholder Engagement Activities include the following:

- 1) **Public meetings open to all stakeholders:** this activity allows involving and reaching out to a wide range of Stakeholders. Due to the interactive approach, concerns and questions from stakeholders can be discussed directly with the RD and possible answers given during the meeting. However, public meetings can also lead to certain groups prevailing on others during the discussion and to the risk of covering only general or recurring issues. In addition, there is a risk that the same stakeholders participate or that numbers of attendees dwindle in time. In such cases, the RD should consider implementing different activities.

Because of the geographic extent of the project area, meetings will need to be organised in different locations to facilitate stakeholder attendance and participation, including Arakhveti, Kvesheti, Kobi, Begoni/Tskere, Sviana-Rotiani/Gomuni/Beniani and Zakatkari. The most appropriate location will have to be identified for each meeting based on the objectives of the meeting and on the stakeholders that have to be involved. If deemed necessary, the RD should organize a transport system to allow all stakeholders, even those with limited mobility, to participate in the meeting. Announcements of public meetings should be made at least two weeks before the meeting. Meeting details have to be posted on the RD website (<http://www.georoad.ge/?lang=geo>). In addition, brochures or posters will be distributed to community representatives and made available in specific places such as the community centre and the RD should liaise directly with community representatives to inform them on the meeting.

The meeting will be chaired by representatives of the RD and the contractors should be present. Where possible, information provided orally during the meeting should also be provided in writing under the form of information sheet or brochure. Attendance of Stakeholders will be registered on a specific form during the meeting.

Once the meeting is over, the RD is responsible for recording information on the Record form and of collecting meeting related material in the dossier.

Public consultation meetings to be held as part of the Scoping and the EIA process will be held in line with the requirements of the Georgian legislation, and those of the ADB and EBRD as described in Section 3.

- 2) **Public meetings open to all stakeholders required by Georgian legislation:** The Ministry has organized a public meeting for the review of the EIA report between 25 and 30 days after the RD has submitted the EIA application. Two meetings were performed in the Dusheti and Kazbegi municipalities; during this phase the RD has liaised with the Ministry to ensure that suitable locations were identified for the meeting and that if necessary a transport system was set up to allow all stakeholders, even those with limited mobility, to participate in the meeting. The announcement of the meeting was made by the Ministry 10 days before the meeting; the announcement was made through local and national newspapers, through bulletins in villages and through websites of the MoE and of the RD. The meetings were chaired by MoE representatives.
- 3) **Focus Group Discussions (FGD) with community members** that have been identified as being representative of relevant groups (local authorities, local business representatives, or NGO representatives). In this case, the RD will organize smaller meetings with specific stakeholders that are



particularly relevant within the scope of the Project and that have proven to be proactive and representative during previous activities. This activity allows focusing on specific issues and possibly finding agreed solutions among parties. However, this meeting is closed therefore does not allow full participation to all stakeholders, possibly leading to the perception in other stakeholders of being excluded. Announcement of the meeting will be done by the RD by directly liaising with the selected stakeholders. If deemed necessary, the RD should organize a transport system to allow all stakeholders, even those with limited mobility, to participate in the meeting.

The meeting will be chaired by representatives of the RD management and of the contractors should be present. Information provided orally during the meeting also will be provided in writing under the form of factsheets or brochures. Attendance of stakeholders will be registered on a specific form during the meeting. Once the meeting is over, the RD is responsible for recording information on the Record form and of collecting meeting related material in the dossier.

- 4) **One to one interviews:** this engagement method allows a more in depth dialogue with specific stakeholders. Through interviews it is possible to collect feedback from stakeholders and to address specific concerns by providing targeted information. This method is particularly useful for engaging with vulnerable stakeholders; due to their conditions, vulnerable stakeholders may have difficulties in participating in certain engagement activities such as public meetings, hence one-to-one meetings can make it easier to reach out to these groups.
- 5) **Key Informant Interviews (KII) / small group interviews:** this engagement method aims at collecting information and feedback relevant to the project from stakeholders (either individuals or small groups) that are knowledgeable on specific subjects of interest (e.g. cultural heritage, tourism etc.). This method is particularly important during the EIA preparation phase, as it allows gathering baseline information and at the same time discussing possible mitigation measures in collaboration with stakeholder.
- 6) **Periodic meetings with local stakeholder:** it is likely that, particularly during construction, the RD will frequently be on the field to assess progress of activities, to check possible grievances emerged and to liaise with contractors. Field visits will hence be the opportunity to informally reach out to stakeholders through conversation and to collect general feedback on project progress from stakeholders. This will be particularly important to keep a communication channel open as well as to show interest and responsiveness to stakeholder requests and concerns. During these meetings, the RD can provide information on progress of works, can collect requests or concerns and can provide replies on simple issues. If the stakeholder has a formal grievance, the RD should address him to use the official Grievance Mechanism. Likewise, if the stakeholder has a complex request that requires the involvement of the RD management or contractors, the RD should provide an intermediate answer and then get back to the stakeholder once a full answer is available.

In addition, if during these meetings certain issues or concerns seem to be emerge periodically or from numerous stakeholders, the RD and its management should consider the opportunity to hold a public meeting, in order to provide the same information to all stakeholders during a single event or to prepare written communication.

- 7) **Open House event:** this activity consists in inviting the public to directly assist to construction activities. In the case of the present Project, allowing the possibility of viewing the tunnel construction can be considered an interesting opportunity to have a better idea of the technologies being used and of the mitigation measures being implemented.

An Open House typically includes an introductory meeting, a tour of selected Site areas accompanied by the RD staff and a final Q&A session. The activity has to be carefully planned in order to ensure full safety of attendees and therefore has to be organized with the support of the appropriate resources. Benefits of this activity include the fact that public can see in first hand site activities, possibly reducing

undue fears and better understanding the project and its nature. In addition, Open House events improve the proponent's reputation of conducting its operation with a transparent and proactive approach. Specific stakeholder groups that can be particularly interested in visiting the construction site should be involved, such as schools, university students or associations of professionals (e.g. engineers or geologists).

Announcements of the Open House will be made at least two weeks before the event by sending written communication to all stakeholders that have previously participated in SEA and are present in the Register. Meeting details will be posted on the RD website and brochures or posters will be distributed to community representatives and made available in specific places such as the community centre. In addition, the RD should liaise directly with community representatives to inform them on the meeting. If deemed necessary, the RD should organize a transport system to allow all stakeholders, even those with limited mobility, to participate in the meeting. Due to safety issues linked to this activity, interested Stakeholders have to confirm their presence and only those that have responded will be admitted. The event will be led by the RD with the support of technical experts who can explain in better detail certain aspects of the Project. Attendance of stakeholders has to be registered on a specific form during the meeting. Once the meeting is over, the RD is responsible for recording information on the Record form and of collecting meeting related material in the dossier.

- 8) **News bulletins and web posting:** this approach is less time-consuming for the RD and allows reaching out to a wide array of stakeholders. The newsletter will be sent to all Stakeholders that are in the register and will be posted on the RD's website. In addition, printed copies will be posted on a visible bulletin board in locations such as the community centre and sent to specific stakeholders for further distribution. The newsletter should provide information on the progress of activities, on possible changes to the schedule, on results of monitoring activities and on other relevant issues worth sharing with stakeholders. The newsletter should always contain a section on the grievance mechanism, to ensure that stakeholders are acquainted on the procedure to be followed to submit a grievance.
- 9) **Letters and phone calls:** when deemed necessary the RD should write to or call representative stakeholders to inform them on progress of activities and to discuss possible critical issues that have emerged. This tool is simple to implement and allows creating a strong connection with certain stakeholders and identifying possible problems together in advance.
- 10) **External Report:** outcomes of activities performed and of the grievance mechanism implementation, as well as main issues emerged from stakeholders will be collected in a report to be periodically disclosed to stakeholders, as indicated in Section 9.2.2.

# Civil Society Engagement Plan

## Civil Society Participation Plan

Civil Society Group	Objective of Their Intervention	Approach to Participation and Depth	Participation methods		Timeline	Cost Estimate
	Why included		Method	Who is Responsible		
<p><b>Civil society</b> International civil society organizations (INGOs) with experience in environmental issues, conservation, rural development</p>	<p>To utilise their expertise to engage with target communities of the project, to strengthen local grass-roots civil society capacity to implement specific activities to contribute to the effective implementation of the project.</p> <p>They have experience in design and delivery of community awareness raising programs, and others have experience in promoting local development through community-based participatory integrated resource management planning.</p>	Collaboration (High)	<p><b>Consultations, interviews, public meetings</b> with key project stakeholders (including local civil society) to solicit feedback and generate support for the project during project preparation and implementation at least every six months.</p> <p><b>Ensure understanding</b> of project impacts, outcomes and outputs and importance of theme of inclusive growth.</p> <p>Regular updates on project activities and relevant developments</p>	<p>MoRDI, MoE, ADB, EBRD</p> <p>MoRDI, ADB, EBRD</p> <p>Lead CSO or development partner engaged for design and delivery of specific sub-activity working with local CSOs</p> <p>CSOs engaged by lead CSO or development partner</p>	During design of the project and throughout project implementation.	
<p><b>Civil Society</b> Beneficiary communities and villages (including affected people) vulnerable groups, households living in poverty, church groups, women's groups, youth groups</p>	<p>To identify community needs/preferences, and build support for the project, and the eco-tourism development</p>	<p>Information generation/ Information sharing (High)</p> <p>Consultation</p>	<p><b>Information:</b> IAs to conduct community meetings and dissemination of information brochures on project scope, design elements, participation mechanisms and entitlements for person affected by the road project.</p>	MoRDI, MoE, ADB, EBRD	During design of the project and throughout project implementation.	

	<p>component among beneficiaries.</p> <p>Church groups, youth groups and their leaders have strong links and influence in communities and can assist in building project awareness, project ownership among communities, and help identify community preferences and issues.</p>	(medium)	<p><b>Information sharing:</b> IAs to convince public meetings implementation to inform them of the project purpose, scope, benefits and road schedules.</p> <p><b>Determine</b> needs of local communities and input into project design; explain benefits of project, impacts during construction, gender awareness, etc.</p> <p><b>Participatory methods</b> (focus groups, community consultations) used to engage with church, women's and youth groups in project design and early implementation for feedback on the design and delivery of the road project.</p> <p><b>Utilize existing community engagement mechanisms</b> of church, women's and youth groups, working with local CSOs for delivery of the project (women's/youth group meetings, church services).</p> <p><b>Advocacy by influential leaders</b> for an improved outcome of the project.</p> <p><b>Information dissemination to key project stakeholders</b> by the implementing agency.</p> <p><b>Project implementation:</b> capacity development on gender awareness, labor opportunities, etc.</p> <p><b>Conduct meetings</b> with them to raise visibility of benefits of eco-tourism development &amp; cross-</p>	<p>Lead CSO or development partner and local CSOs engaged/ partnered with for the design/delivery of the specific awareness raising component of the project</p> <p>MoRDI, MoE</p>		
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			<p>border tourism cooperation for inclusive growth as key sector for economic development.</p> <p><b>Participatory Assessment:</b> receive information on project components, benefits, impacts; provide inputs in consultation to consider sub-project design options to enhance project benefits to the neighbourhood.</p> <p><b>Construction:</b> inform villages and prioritize qualified workers from low-income communities in the project site.</p>			
<p><b>Civil Society</b> National civil society organisations (including advocacy NGOs) with experience of economic policy and entrepreneurship development, social accountability tools and approaches</p>	<p>To identify community needs/preferences, and build support for the project, and the eco-tourism development component among beneficiaries.</p> <p>To promote transparency and citizen engagement.</p> <p>Civil society with experience of social accountability mechanisms can provide useful community feedback and monitoring during project implementation.</p>	<p>Collaboration (medium)</p>	<p><b>Contract CSOs</b> with appropriate experience and expertise to conduct a study on possible business opportunities for local communities in the project affected areas.</p> <p><b>CSOs contracted to deliver training to contractor staff:</b> CSOs conduct work safety, and first aid training with contractor staff, contracted as required.</p> <p><b>Contracting</b> to deliver training for local communities and small-scale entrepreneurs for eco-business or livelihood options, including specific trainings for women to raise their understanding on business opportunities</p> <p><b>Social accountability tools and approaches</b> used by CSOs to monitor and provide feedback on project activities, annually.</p> <p><b>Information dissemination to key project stakeholders</b> by the implementing agency.</p>	<p>ADB, NGOC consultant</p> <p>Lead CSO or development partner</p>	<p>During design of the project and throughout project implementation.</p>	

			Regular updates on project activities and relevant developments.			
<b>Civil Society</b> Community-based organisations	<p>To utilise local knowledge and effectively engage with the target communities of the project.</p> <p>Raise visibility of the benefits of eco-tourism development &amp; cross-border tourism cooperation for inclusive growth as key sector for economic development.</p>	<p>Information generation/sharing (High)</p> <p>Collaboration in partnership with an INGO or a national NGO</p>	<p><b>Consultations, interviews, public meetings</b> with key project stakeholders (including local civil society) to solicit feedback and generate support for the project during project preparation and implementation at least every six months.</p> <p><b>Social accountability tools and approaches</b> used by CSOs to monitor and provide feedback on project activities, annually.</p> <p><b>Project Implementation:</b> direct consultations and participation in project implementation through collaboration with local government and representation in the municipal steering committee.</p> <p><b>Conduct meetings</b> with them to raise visibility of benefits of eco-tourism development &amp; cross-border tourism cooperation for inclusive growth as key sector for economic development.</p> <p><b>Monitoring:</b> representation on municipal-level meetings and district resettlement/project affected committees.</p>	MoRDI, MoE, ADB, EBRD	During design of the project and throughout project implementation.	
<b>Civil Society</b> Professional associations and academia		<p>Information generation/sharing (High)</p>	<p><b>Project Implementation:</b> direct consultations and participation in project implementation.</p> <p>Regular email updates on project</p>	MoRDI, MoE	During design of the project and throughout project implementation.	

		Collaboration (Medium)	activities and relevant developments.			
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**APPENDIX E**

**Example of Stakeholder  
Engagement Activities Register**

Example of Stakeholder Engagement Activities Register

ID number	Typology	Date	Location	Title of the meeting
1	Public Meeting			
2				
3				
4				

Example of Stakeholder Engagement Activity Form

<b>ID Number:</b>	
<b>Engagement Activity:</b>	
<b>Location and Date:</b>	
<b>Description of the activity or event</b>	
<b>Project Phase:</b>	
<b>Typology:</b>	
<b>Announcements and communication:</b>	
<b>Minutes of Meeting reference:</b>	
<b>Attendees Stakeholders</b>	
<b>Attendees RD team</b>	
<b>Activity Details</b>	
<b>Agenda:</b>	
<b>Presentation material used:</b>	

<b>Discussion points:</b>	
<b>Outcomes:</b>	
<b>Actions to be taken:</b>	
<b>Lesson learned</b>	
<b>Other notes</b>	



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