

Dnepro Bugsky Wind Farm

Stakeholder Engagement Plan (SEP)

21 November 2018

Dnepro Bugsky Wind Farm

Stakeholder Engagement Plan (SEP)

21 November 2018

3985161B

Confidential

Contents

Glossary of terms	1
Acronyms	2
1 Introduction and project summary	3
1.1 Overview	3
1.2 Objectives of this Stakeholder Engagement Plan	3
1.3 Project description and location	3
1.4 Project justification	4
1.5 Previous consultation activities	4
1.6 Plan structure	5
2 Stakeholder engagement requirements	6
2.1 Overview	6
2.2 National regulations	6
2.3 European Bank of Reconstruction and Development (EBRD) requirements	6
3 Identification of stakeholders and communication methods	8
3.1 Overview	8
3.2 Stakeholder identification and analysis	8
3.3 Encouraging participation of women and vulnerable groups	9
4 Stakeholder engagement programme	10
4.1 Roles and responsibilities	11
4.2 Community Liaison Officer (CLO) contact information	11
5 Public grievance mechanism	12
5.1 Overview	12
5.2 Grievance reporting and resolution	12
5.3 Confidentiality and anonymity	15
6 Reporting	16
6.1 Documents to be publicly disclosed before construction begins	16
6.2 Stakeholder engagement plan reporting	16
6.3 Community liaisons officer reporting	16
6.4 Annual reporting	16
6.5 Performance evaluation	17

Appendices	18
A. Grievance Registration Form	19
B. Grievance Log Template	20

Glossary of terms

Term	Definition
Consultation	Consultation is a two-way process of dialogue between DBWPP and its stakeholders. Stakeholder consultation is about initiating and sustaining constructive external relationships over time.
Grievance Mechanism	Procedure provided by a project to receive and facilitate resolution of affected communities' concerns and grievances about the project's environmental and social performance.
Environmental and Social Impact Assessment (ESIA)	A forward-looking instrument that is able to proactively advise decision-makers on what might happen if a proposed activity is implemented. Impacts are changes that have environmental, political, economic, or social significance to society. Impacts may be positive or negative and may affect the environment, communities, human health and well-being, desired sustainability objectives, or a combination of these.
Information Disclosure	Disclosure means making information accessible to interested and affected parties (stakeholders). Communicating information in a manner that is understandable to stakeholders is an important first and ongoing step in the process of stakeholder engagement. Information should be disclosed in advance of all other engagement activities, from consultation and informed participation to negotiation and resolution of grievances. This will make engagement more constructive.
Stakeholders	Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project or the ability to influence its outcome, either positively or negatively.
Stakeholder engagement	Stakeholder engagement is an ongoing process involving (i) the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders; (ii) meaningful consultation with potentially affected parties, and (iii) a procedure or poly by which people can make comments or complaints.

Source: Based on EBRD Performance Requirements and International Finance Corporation Good Practice Handbook on Stakeholder Engagement (2007)

Acronyms

Acronym	Term
AC	Affected communities
AOI	Area of Influence
CESMP	Construction Environment and Social Management Plan
CHS	Community Health and Safety
CLO	Community Liaison Officer
EHS	Environment, Health and Safety
ESIA	Environmental and Social Impact Assessment
EMP	Environmental Management Plan
EPRP	Emergency Preparedness and Response Plan
ESA	Environment and Social Assessment
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
PAPs	Project Affected Peoples
PRs	Performance Requirements
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
WTG	Wind turbine generators

1 Introduction and project summary

1.1 Overview

The European Bank for Reconstruction and Development (EBRD) is considering financing of the construction, connection to the power transmission grid, commissioning and start-up of a 110MW Dnepro-Bugsky wind power plant (WPP or 'the project'), located near Olexandrivka village, Bilozersk district, Kherson Oblast, in the south of Ukraine. The project is owned by Dnepro-Bugsky Wind Power Project LLC ('DBWPP') and will be completed in compliance with the policy requirements of the EBRD. The project has been categorised as Category A in accordance with the EBRD's Environmental and Social Policy 2014, which means that it could result in potentially significant adverse future environmental and/or social impacts which, at the time of categorisation, cannot readily be identified or assessed, and which, therefore, require a formalised and participatory environmental and social impact assessment process. In accordance with the requirements of the EBRD and national legislation, a feasibility study and environmental and social impact assessment (ESIA) will be carried out for the project.

This Stakeholder Engagement Plan (SEP) is designed to promote the project's approach to stakeholder engagement throughout its lifecycle. Therefore, the scope of this SEP covers all Project phases including from ESIA scoping to post-ESIA submission, as well as the construction and operations phase.

1.2 Objectives of this Stakeholder Engagement Plan

This SEP is a strategic document for planning a comprehensive and culturally appropriate approach to consultation and disclosure for the lifecycle of the project. The purpose of this SEP is to provide a consultation and participation strategy for the project which:

- Defines Project's legal requirements concerning disclosure and consultation.
- Identifies stakeholder groups that could be affected or may have an interest in the project.
- Ensures that such stakeholders are appropriately engaged through a process of information disclosure and meaningful consultation on environmental and social issues that could potentially affect them.
- Maintains a constructive relationship with stakeholders on an on-going basis through meaningful engagement during project implementation.
- Provides a grievance mechanism to allow communities and other stakeholders to register complaints, queries or comments that are addressed in a timely manner by the project.
- Plans for stakeholder engagement which is free of manipulation, interference, coercions, and intimidation and is conducted on the basis of timely, relevant, understandable and accessible information in a culturally appropriate format.

1.3 Project description and location

The project will be located on the coast of the Gulf of the Dnepro Bugsky in southern Ukraine within the Kherson region bordering the Mykolaiv region, as shown in below. It will consist of 25 wind turbine generators (WTG) with a nominal power of 4.4MW, and a new on-site 35/150kV

substation. An associated 150kV overhead line will be built that is to be 27km long and connect to the Posad-Pokrovskaya substation.

Figure 1: Project location in Ukraine



Source: Project EIA 2017

1.4 Project justification

The project is in line with the Energy Strategy of Ukraine and the National Action Plan for Renewable Energy until 2020. It will contribute to the national goal of creating 16,000MW of wind power capacity. It will also contribute to the national goal to reduce the average annual emission of carbon dioxide to 32 million tons.

Currently, almost all the electricity consumed in the Kherson Oblast is generated by the South-Ukraine Energy Complex that consists of nuclear and hydroelectric power plants. The South-Ukraine Nuclear Power Plant provides around 95% of the electricity for three Oblasts, including the Kherson Oblast, so it would be beneficial for the area to diversify its source of electricity to increase the security of supply. This will be the first wind power project in the region which is seen as a welcome diversification using a renewable resource.

Alternatives to the project include a plan to commission another nuclear reactor in the South-Ukraine Nuclear Power Plant. However, there are several obstacles to the development of this nuclear reactor including the length of time required, funding availability, and the resistance of environmental non-governmental organisations (NGOs) and a significant portion of the population of the region. There are also a number of solar and wind projects planned for the region, but it is not clear that any are as advanced in their preparation as the Dnepro Bugsky WPP.

For the reasons outlined above, the Akuo Energy believes that the development of the Dnepro Bugsky WPP is the most beneficial electricity supply project for the region at the present time.

1.5 Previous consultation activities

The information disclosure undertaken to date as part of the national environment permitting process is considered to be in line with IFC PS1 requirements as the public consultation was undertaken under the provisions of the Aarhus Convention, the laws of Ukraine (Law of Ukraine

"On regulation of urban development" CMU of 25 May 2011 555 number, DBN A.2.2-1-2003 et al.) and EBRD Social policy.

Between 2017 and 2018, around 200 consultation meetings were held with the owners and users of land involved for Project construction within the territory of Oleksandrivska, Pravdynska and Posad-Pokrovska village councils. This informed the development of a detailed territory plan, environmental impact assessment and inventory of land plots. Consultations were held with all land owners and users covering:

- land use during construction and operation
- rights and obligations with regard to the project
- information on compensation and entitlements for losses
- the details of signing servitude agreements

In addition the project held a public consultation in April 2017 attended by 82 people, in which the project and the environmental impact assessment (EIA) results were explained. Attendees included representatives of:

- Village communities in Alexandrovka
- Kherson Regional State Administration
- Department of Environment and Natural Resources
- Department of Urban Development and Architecture
- National Aviation University

The attendees unanimously voted to support the construction of the project.

The public has also been informed about the project via the media and internet, including through:

- Publication in the newspaper "Dnieper Star"
- Publications on the project's web site.
- EIA provision at a local library

For some community members, DBWPP also organised a site visit to a nearby existing wind farm in Skadovsk. The visitors found it very useful to hear from the other community members and leaders living near that wind farm that there were no impacts on health or fish and no problems with noise and vibration.

On the 23rd October 2018, public hearings were undertaken to present the environmental impact assessment, focusing on the transmission line component. 63 people attended the meeting and no objections towards the project were raised.

1.6 Plan structure

The remainder of this SEP is structured according to the following sections:

1. Stakeholder engagement requirements
2. Identification of stakeholders and communication methods
3. Stakeholder engagement programme
4. Public grievance mechanism
5. Reporting

2 Stakeholder engagement requirements

2.1 Overview

This chapter sets out the regulatory requirements relevant to the involvement of stakeholders in the project. This SEP has been produced to meet the legislation and policy regulations of the Government of Ukraine and to meet the information disclosure, consultation and stakeholder participation requirements of the EBRD. These requirements are summarised below.

2.2 National regulations

National legislation¹ mandates broad public involvement in decision-making processes. Ukraine is a signatory to the Aarhus Convention, which requires public access to environmental information and decision-making². Ukraine is also a signatory to the United Nations Economic Commission for Europe (UNECE) Espoo Convention which requires that consultations be conducted with affected parties before final decisions are made concerning the EIA documentation.

2.3 European Bank of Reconstruction and Development (EBRD) requirements

The project is seeking finance from the EBRD, and thus is structured to meet EBRD's 2014 Environmental and Social Policy (ESP) including Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement and to satisfy the Bank's commitment to disclosing project information as set out in EBRD's 2014 Public Information Policy (PIP) document.

The EBRD's ESP defines stakeholder engagement as an on-going process which involves:

- Public disclosure of appropriate information
- Meaningful consultation with stakeholders
- An effective procedure or mechanism by which people can make comments or raise grievances

The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project. The EBRD requires that stakeholder engagement:

- Provide affected communities and other interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion, and intimidation
- Involve stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders
- Be proportionate to the nature and scale of the project and its potential adverse impacts on the affected communities, the sensitivity of the environment, and the level of public interest

¹ Including Law of Ukraine "On regulation of urban development" CMU of 25 May 2011 555 number, DBN A.2.2-1-2003 et al.

² UNECE Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters

- Be based on clearly defined roles, responsibilities, and authority as well as designated personnel of the Company to be responsible for the implementation and monitoring of consultation and disclosure activities

Special provisions will be made to identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status, and to allow such groups or individuals to be informed about Project information and give their views on the project where appropriate. The specific vulnerable groups that have been identified are discussed in section 3.3.

3 Identification of stakeholders and communication methods

3.1 Overview

Project Stakeholders are people and groups who (i) will be affected by the project, (ii) are likely to be interested and/or (iii) could influence the outcome of the project. These individuals and groups have been identified, including analysis on the best ways to engage with them, according to the media that they are likely to use and be most comfortable with.

Stakeholders with diverse perspectives on the project can contribute to new understanding of local circumstances and/or project impacts, risks and benefits leading to identification of further opportunities for action. Over time it will be necessary to modify the list of stakeholders and /or methods of communication to meet changing circumstances. The project Sponsor will therefore undertake periodic reviews of their stakeholders.

3.2 Stakeholder identification and analysis

A stakeholder mapping exercise was carried out to provide a strategically focused stakeholder list with targeted means of engaging with them. An analysis of Project stakeholders, interests, and suggested communication and consultation methods is summarised in Table 1.

Table 1: Identification of stakeholders and consultation methods

Stakeholders	Communication methods
Internal stakeholders	
Temporary construction workers, subcontractors, other non-employee workers	Information in contract, bulletin board, training, grievance procedure, code of conduct
External stakeholders	
Community members	
Members of Oleksandrivka, Pravdino and Posad-Pokrovskoe villages	Public consultations, project website
Village Councils of Oleksandrivka, Pravdino and Posad-Pokrovskoe	Private meetings, public consultations, project website
Private landowners and farmers who have signed servitude agreements with Project	Private meetings, public consultations, project website
Land users including informal users that make use of land on the proposed overhead line	Private meetings, public consultations, project website
Sensitive receptors including security personnel housed in facilities at a nearby farm	Private meetings, public consultations, project website
Vulnerable populations, if identified throughout consultation process	Private meetings, public consultations, project website
Non-governmental and civil society organisations	
Laguna Non-Governmental Ecological Organisation	Private meetings and public consultations
Other relevant NGOs as identified throughout consultation process ³	Public consultations, project website

³ Examples include Kherson Youth Initiative Group "Kypiatok" And Kherson Regional Charitable Foundation "Mangust"

Stakeholders	Communication methods
Governmental agencies	
Kherson Regional State Administration State Administration	Private meetings and public consultations
Department of Environment and Natural Resources	Private meetings and public consultations
Department of Urban Development and Architecture	Private meetings and public consultations
Academic institutions	
National Aviation University	Private meetings and public consultations

3.3 Encouraging participation of women and vulnerable⁴ groups

The EBRD requires that specific attention is paid to impacted women and vulnerable groups to ensure that their views are heard, recorded and taken into account in the project planning and implementation. DBWPP recognises that vulnerable, marginalised and disadvantaged groups are likely to experience impacts differently from mainstream society.

While the ESIA did not identify specific vulnerable groups that may experience differential or disproportionate adverse impacts from the project, the following groups are considered to have potential vulnerabilities:

- Women heads of households whose livelihoods are affected by loss of access to agricultural land located within the project area
- Low-income households whose livelihoods are affected by loss of access to agricultural land located within the project area

Consultation will be used to facilitate these groups' active participation in stakeholder engagement activities, and gather information and opinions on how they will be affected by the project. Consultation and information disclosure activities will take into consideration logistical and cultural factors such as language, physical access, gender roles, literacy levels, time availability of vulnerable groups, and ability of such groups to access and participate in social and mass media engagement activities. If necessary separate meetings will be arranged to gather the views of vulnerable groups, for example if there is low level of participation of women or vulnerable groups in the general consultation meetings organised.

For further assistance to engage and support vulnerable populations, non-governmental organisations identified in section 3.2 will be engaged.

⁴ As defined in the EBRD's ESP vulnerable groups refer to people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status 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. Vulnerable individuals and/or groups may also include, but not be limited to, people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and /or international law.

4 Stakeholder engagement programme

This section describes the main activities that will be undertaken throughout the ESIA process and on an on-going basis throughout the life of the project.

DBWPP will appoint an employee within the customer care department to serve as the community liaison officer (CLO) for the project. Once the role has been appointed, their contact details will be disclosed to the stakeholders through DBWPP's website, social media pages and shops and an updated version of this SEP.

Table 2 outlines the specific consultation and disclosure activities, their sequence and responsible parties. Specific timeframes within the construction phase will be updated following DBWPP's finalisation and confirmation of the construction schedule.

Table 2: Stakeholder Engagement Programme

Activity	Timing/detail	Responsibility
1) ESIA Phase Engagement		
Scoping		
ESIA scoping meetings, introductory interviews and key informant interviews	Q1 2018	DBWPP
Disclosure of information leaflet about the Project	Q1 2018	DBWPP
Disclosure of SEP and ESIA Scoping Report	Q1 2018	DBWPP
Comments on SEP and Scoping Report	Q1 2018	DBWPP
National ESIA Disclosure		
Disclosure of national ESIA documentation	Q1 2018	DBWPP
<i>ESIA Phase Engagement – Draft ESIA Disclosure</i>		
Announcement of Draft ESIA disclosure and public meeting	Q2 2018	DBWPP
Disclose draft ESIA report and related documents and hold draft ESIA meetings	Q2 2018	DBWPP
Media communications	Q2 2018	DBWPP
Disclose final ESIA and related documents	Q2 2018	DBWPP
Lenders disclosure	Q2 2018	Lenders
2) Construction Phase Engagement		
Consultation with governmental agencies	TBC	DBWPP
Community consultation and disclosure of construction schedules	TBC	DBWPP
Ongoing community liaison and grievance process	TBC	DBWPP
Regular updates of website, social media, in newspapers and on radio	TBC	DBWPP
Update Environmental and Social Management Plan (ESMP)	TBC	DBWPP
Update SEP	Annually	DBWPP
Annual reporting	Annually	DBWPP
3) Operation Phase Engagement		

Activity	Timing/detail	Responsibility
Ongoing community liaison and grievance process	Ongoing	Main Contractor (TBC)
Update SEP	Annually	Main Contractor (TBC)
Annual reporting	Annually	Main Contractor (TBC)

4.1 Roles and responsibilities

Through the preparation of the national ESIA, the main SEP implementation responsibilities were undertaken by DBWPP. Specific documents related to the ESIA will be provided by Ukrecoconsalt who were responsible for the development of the ESIA. DBWPP will be responsible for translation of materials into Ukrainian, the publication of relevant documents and ensuring they are distributed to the appropriate stakeholders, as well as publication of relevant media notices. DBWPP will also maintain the comments registers during Project preparation. Comments can be submitted to the contact details provided in Section 6.

DBWPP will appoint an employee within the customer care department to serve as the CLO for the project, by managing the implementation of this SEP and other social commitments included within the project's Environmental and Social Management and Monitoring Plan (ESMMP) to be developed.

The CLO will be responsible for community liaison and arranging communications with Project affected people. The CLO will be responsible for receiving and channelling comments and concerns during the ESIA phase and management of the grievance mechanism during the construction and operational phases. The CLO will also attend and record stakeholder engagement activities and maintain regular lines of communication with key stakeholders.

4.2 Community Liaison Officer (CLO) contact information

All general comments, queries and grievances can be submitted to the CLO or voiced through the dedicated feedback telephone number – the below details will be updated once DBWPP has appointed its CLO:

- Name: TBC
- Company: DBWPP
- Postal Address: TBC
- E-mail address: TBC
- Project Website: TBC
- Dedicated Grievance Telephone Number: TBC

5 Public grievance mechanism

5.1 Overview

Having a grievance mechanism is an EBRD requirement for DBWPP. Using the mechanism must be voluntary activity for the complainant. As required, this grievance mechanism permits anonymous complaints, respects the confidentiality of the role players involved, and protects both the complainant and the company from retaliation. The public grievance mechanism is based on the principles of being legitimate, accessible, predictable, equitable, transparent, rights compatible, continuous learning, and dialogue based. The grievance mechanism can be used to determine lessons learned and identify ways for continuous improvement.

A grievance can be defined as an actual or perceived problem that might give grounds for complaint. As a general policy, DBWPP and its contractors will work proactively towards preventing grievances through the implementation of impact mitigation measures (as identified in the ESIA and ESMMP) and community liaison.

Anyone will be able to submit a grievance to the project if they believe a practice is having a detrimental impact on the community, the environment, or their quality of life. They may also submit comments and suggestions. Any type of issue can be raised. The sections below present the project's grievance resolution process and consider confidentiality and anonymity.

5.2 Grievance reporting and resolution

The main steps for handling grievances are: receive, categorise, acknowledge, investigate, respond, allow for recourse/appeal and follow-up, and close out.

Grievances will be recorded in a formal logging system for which the CLO will be responsible. The grievance log will be separate from a stakeholder log which details interactions with communities and stakeholders. People may register grievances using the form in Appendix A, by contacting the CLO, or online using the DBWPP website. Contact details for the CLO will be included in appropriate project communication materials such as the non-technical summaries.

The CLO will classify grievances according to Table 3. Where investigations are required Project staff and outside authorities as appropriate will assist with the process. The CLO will collaborate with DBWPP or the main contractor's management, to identify an appropriate investigation team with the correct skills to review the issue raised. The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities.

Table 3: Grievance Classification Criteria

Classification	Risk level (to health, safety or environment)	Response
Low	No or low	The grievance may not be related to Project performance, it may be a comment, or a request. CLO will acknowledge complaint within 7 days and conduct an investigation if required. The CLO will document findings and provide a response within 30 days of receiving. The response is likely to have minimal cost in addition to time spent on addressing the issue.
Medium	Possible risk and likely a one-off event	CLO will acknowledge complaint within 7 days. The CLO and an appropriate investigation team will conduct investigation. The Site Manager or Occupational Health and Safety Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response within 30 days of receiving complaint. The corrective action is likely to be straight forward involving changing a piece of equipment or procedure which does not take long or have substantial cost implications to implement.
High	Probable risk and could reoccur	CLO will acknowledge the complaint within 7 days and will get the Project Manager to organise a major investigation team for prompt investigation and resolution. Work may be stopped in the affected area. The CLO will provide a response within 30 days of receiving complaint. If more time is needed to complete the investigation this will be communicated to complainant within 30 days of receiving complaint. As necessary the response will include a press release. The corrective action may be complex or sensitive involving changing equipment or a procedure which requires training of staff and has substantial cost implications.

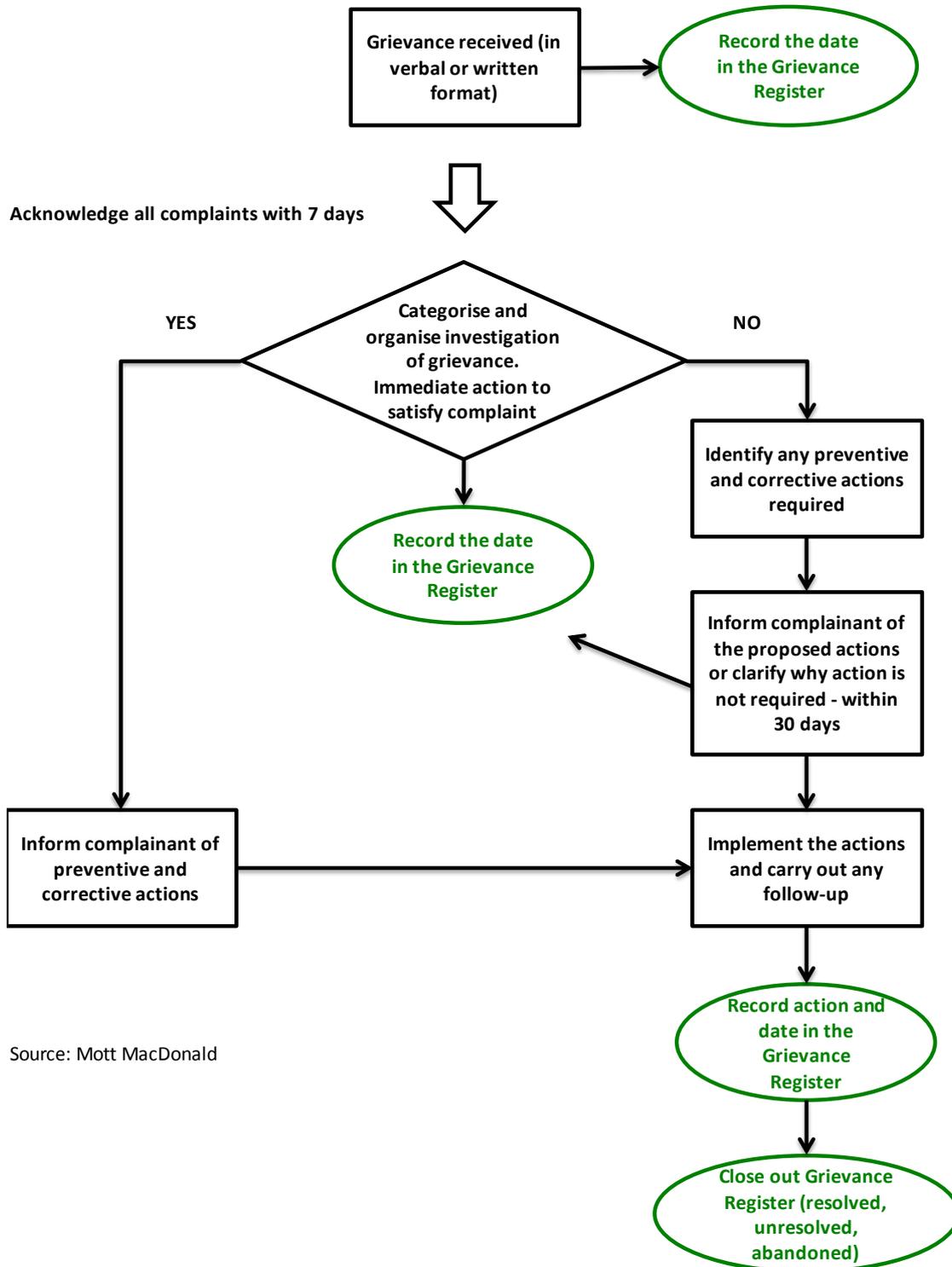
The CLO will explain to the complainant in writing (or where literacy is an issue, orally) the grievance review process, the investigation results, any changes to activities that will be undertaken to address the grievance, and how the issue is being managed to meet the project's commitments and environmental and social management system. In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions. The grievance will be closed out in the register as:

- Resolved - the resolution has been communicated, agreed and/or implemented.
- Unresolved - the complainant did not accept the proposed resolution and has appealed to other entities for resolution.
- Abandoned - the complainant is no longer contactable and efforts to trace whereabouts have been unsuccessful.

The CLO will summarise grievances weekly or monthly during construction and bi-annually during operation removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity. The procedure will be at no cost and without retribution to the complainant and stakeholders. The procedure for processing grievances is depicted in Figure 2.

Figure 2: Flowchart for processing grievances

Flowchart for Processing Grievances



Source: Mott MacDonald

During the construction phase, the sponsor will nominate a staff member as the CLO and point of contact for grievances. Grievances should be sent to the contacts shown in section 4.2, where possible by using the form provided in Appendix A. Grievances may also be raised via DBWPP in the construction phase. When this occurs, DBWPP will forward grievances to the main contractor's CLO for management. The contact details below will be updated once the CLO positions have been appointed.

5.3 Confidentiality and anonymity

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

6 Reporting

6.1 Documents to be publicly disclosed before construction begins

A range of documents detailing the environmental and social impacts associated with the project will be made publicly available before construction commences. This is in order to allow all stakeholders to comment on the project to feed into the design and mitigation measures. This includes:

- Environmental and social impact assessment (ESIA)
- Non-technical summary of the ESIA
- Environmental and social monitoring and management plan (ESMMP)
- Livelihood restoration plan (LRP)
- Stakeholder engagement plan (this document)

6.2 Stakeholder engagement plan reporting

This SEP identifies a number of key reporting activities. The SEP will be reviewed by DBWPP throughout the course of Project preparation as deemed necessary or at least once a year, and annually during its implementation and once the project is operational (please refer to Table 2) in order to assess whether:

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

Additional updates influenced by the project development may be required.

6.3 Community liaisons officer reporting

The CLO will be responsible for:

- Listing disclosure activities, adverts placed in newspapers and other media
- Keeping minutes of consultation meetings with dates, venue, list of participants and photos
- Retaining original written consultation correspondence including comments left as evidence of the process and outcomes
- Grievance logging and tracking: each grievance will be logged, given an identification number and followed through by recording details and timing for their resolution and closing out

6.4 Annual reporting

A Project specific annual report summarising project performance, including stakeholder engagement and grievances, will be produced during construction for project affected people. Information about the project during its operational phase will be included in DBWPP's annual reports.

6.5 Performance evaluation

Performance of stakeholder engagement will be evaluated against the goals and objectives set out in this SEP. The evaluation will review to what extent the SEP activities have been completed and how the identified goals have been achieved. Evaluation results and any lessons learned will be incorporated in the respective SEP updates.

Appendices

A.	Grievance Registration Form	19
B.	Grievance Log Template	20

A. Grievance Registration Form

Full Name	
Contact Information Please identify how you wish to be contacted (mail, telephone, e-mail)	By Post: Please provide mailing address By telephone: By e-mail:
Preferred language of communication?	English Ukrainian.....
Description of incident or grievance (What happened? Where did it happen? Who did it happen to? What is the result of the problem?):	
Date of incident/grievance	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see to resolve this problem?	
Internal Use Only Grievance received by: Date: Reference number:	

B. Grievance Log Template

Table 4: Grievance log template

Number	Date received	Name/ Anonymous	Type of grievance	Classification	Brief description	Person responsible for follow-up	Actions taken	Date resolved	Action taken to avoid future similar grievances

Source: Mott MacDonald

