



MTO GAS Complex ESIA

Stakeholder Engagement Plan

October 2022

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List of Abbreviations

Abbreviation	Description
ACs	Affected communities
CLO	Community Liaison Officer
Company	GAS CHEMICAL COMPLEX MTO CENTRAL ASIA, Limited Liability Company
Consultant	Mott MacDonald Limited and Ekostandart Ekspert LLC
E&S	Environmental and social
EBRD	European Bank for Reconstruction or Development
EHS	Environment, health and safety
EIA	Environmental impact assessment
EPE	European Principles for the Environment
ESAP	Environmental and social action plan
ESIA	Environmental and social impact assessment
ESMMP	Environmental and social management and monitoring plan
ESP	Environmental and Social Policy of the EBRD
EU	European Union
GIIP	Good international industry practice
Goskomekologiya	State Committee on Ecology and Environment Protection of the Republic of Uzbekistan
GoU	Government of Uzbekistan
IFC	International Financial Corporation
NGOs	Non-governmental organisations
MIGA	Multilateral Investment Guarantee Agency
NTS	Non-Technical Summary
PER	Public environmental review
Project	Gaz Chemical Complex in the Bukhara Region of Uzbekistan utilising methanol to olefin technology
PRs	Performance Requirements
PSs	IFC Performance Standards on Environmental and Social Sustainability
RoU	Republic of Uzbekistan
SEE	State Environmental Expertise
SEG	“SANOAT ENERGETIKA GURUHI” LLC
SEP	Stakeholder Engagement Plan
SIA	Social impact assessment

Contents

1	Introduction and Project Summary	1
1.1	Overview	1
1.1	Project Description	1
2	Stakeholder Engagement Requirements	3
2.1	Overview	3
2.2	National Requirements	3
2.3	Applicable International Requirements	4
2.3.1	EBRD Requirements	4
2.3.2	IFC and MIGA Requirements	5
3	Identification of Stakeholders and Communication Methods	7
3.1	Who are Project Stakeholders?	7
3.2	Previous Stakeholder Engagement and Disclosure	7
3.2.1	Scoping Phase Consultation and Disclosure	7
3.2.2	Impact Assessment Phase Consultation	8
3.2.3	ESIA Disclosure Consultation	9
3.3	Stakeholders Analysis	10
3.3.1	Primary Stakeholders	11
3.3.2	Secondary Stakeholders	12
3.3.3	Tertiary Stakeholders	12
3.3.4	Summary of Analysis	12
4	Stakeholder Engagement Programme	15
4.1	Overview	15
4.2	Gender considerations	15
4.3	Inclusion and Continuity	15
4.3.1	Web resources	16
4.4	Community Liaison Officer	16
4.5	Specific approach during COVID-19 Restrictions	16
4.5.1	Attention to vulnerable groups	16
4.6	Engagement Programme	16
5	Public Grievance Mechanism	21
5.1	Overview	21
5.2	Confidentiality and Anonymity	21
5.3	Grievance Reporting and Resolution	21
6	Monitoring and Reporting	23

6.1	SEP Reviews and Updates	23
6.2	Grievance Reporting	23
6.3	Annual Reporting	23
6.4	Project Environmental and Social Management Plan	23
6.5	Performance Evaluation	23

Appendices 25

A. Grievance Form 26

B. Flow Chart to Process Grievances 27

Tables

Table 3.1: Descriptors of Stakeholder Dependence	10
Table 3.2: Descriptors of Stakeholder Influence	10
Table 3.3: Determining Stakeholder Category	11
Table 3.4: Project Stakeholders and Engagement Methods	13
Table 4.1: Stakeholder engagement timescales and responsibilities	17
Table 5.1: Grievance classification criteria	22
Table 5.2: Project Community Liaison Officer	22

1 Introduction and Project Summary

1.1 Overview

Mott MacDonald, supported by Uzbek consultancy company Ekostandart Ekspert LLC, has been appointed by “SANOAT ENERGETIKA GURUHI” (SEG), Limited Liability Company (LLC) – former Jizzakh Petroleum Joint Venture (SEG) – to undertake an Environmental and Social Impact Assessment (ESIA) and determine potential impacts and subsequent effects of the new gas chemical complex (GCC) in the Bukhara region (the **Project**) being implemented by GAS CHEMICAL COMPLEX MTO CENTRAL ASIA, Limited Liability Company (the Company) in the Republic of Uzbekistan (RoU). This document is the Stakeholder Engagement Plan (SEP) prepared as part of the ESIA documentation for the greenfield GCC which will utilise the methanol to olefin (MTO) technology.

The purpose of this SEP is to manage stakeholder engagement activities for the lifetime of the Project. It has been prepared in line with the national law and international requirements.

The SEP is structured in six chapters. After the introduction, the second chapter includes a brief description of the applicable national and international stakeholder engagement requirements. Chapter 3 includes a brief description of the stakeholder's analysis methodology and stakeholders identified during the ESIA scoping phase. Chapter 4 describes principles summarises the disclosure programme for the ESIA phase and going forward for the rest of the Project lifecycle. Chapter 5 illustrates the grievance mechanisms. The last chapter presents the monitoring, reporting and evaluation procedures for SEP.

The SEP is a live document which evolves as the project progresses. Therefore, a continuous approach is taken and the SEP will be reviewed periodically during Project implementation and updated as necessary prior to the Project major phases, any new or changed operations, modifications in the Project design or if new stakeholders are identified.

1.1 Project Description

SEG as the Project Sponsor plans to invest in the construction of a new GCC in the Bukhara region of Uzbekistan. GAS CHEMICAL COMPLEX MTO CENTRAL ASIA, LLC will be the Project Operator and is responsible for the development of the Project, commissioning of front-end engineering design works, and engaging financing consultants and the engineering, procurement and construction contractor (EPC Contractor) for the Project.

The GCC will operate on the technology for producing methanol from natural gas and the further production of olefins from methanol with further polymerization of olefins to the following products:

- Low density polyethylene – 80,000 tonnes per year
- Ethylene vinyl acetate – 100,000 tonnes per year
- Polyethylene terephthalate – 300,000 tonnes per year
- Polypropylene – 252,000 tonnes per year
- Terephthalic acid – 256,000 tonnes per year (feedstock to produce polyethylene terephthalate)

The approximate volume of natural gas processing will be ~ 1.3 billion m³ per year.

The GCC site will accommodate an operational process area, in addition to administrative and utilities management area. The Project site is located in the south-west of Uzbekistan, in the Karakul district of the Bukhara region, close to the border with the Republic of Turkmenistan. The distance from the district's administrative centre, Karakul town, to the city of Bukhara is about 60km.

International finance for these investments is sought by SEG from international lenders which adhere to the International Finance Corporation (IFC), Multilateral Investment Guarantee Agency (MIGA) and the European Bank for Reconstruction and Development (EBRD) environmental and social requirements.

Ekostandart Ekspert LLC undertook the field work, data collection and public consultations on the ground in Uzbekistan to inform the scoping study of potential impacts and effects of the Project and opinions/concerns of the communities and other stakeholders. Ekostandart Ekspert LLC also supported the assessment phase consultation in June 2021 and ESIA disclosure process in September-October 2022.

2 Stakeholder Engagement Requirements

2.1 Overview

This SEP has been undertaken to meet national legislative requirements of Uzbekistan. Financing for the Project will be sought from international lenders, and it means that the Project will have to adhere to the EBRD Environmental and Social Policy (EBRD ESP) and incorporated Performance Requirements (PRs), IFC/MIGA Performance Standards on Environmental and Social Sustainability (PSs) and good international industry practice (GIIP) related to information disclosure and stakeholder engagement. These requirements are explained in this chapter.

2.2 National Requirements

All developments under the Project as well as the associated project are subject to national Environmental Impact Assessment (EIA). Stakeholder engagement and disclosure of planning and environmental information is regulated as part of the EIA process.

The EIA process in Uzbekistan is governed by the following main legislation:

- RoU Law No.754-XII dated December 9, 1992 "On Environmental Protection"
- RoU Law No.73-II3 dated May 25, 2000 "On Environmental Expertise" (Law on Environmental Expertise)
- Decree of the Cabinet of Ministers of the Republic of Uzbekistan No.541 dated September 7, 2020 "On Approval of the "Regulation on State Environmental Expertise in the Republic of Uzbekistan" (SEE Decree)
- Decree of the RoU Cabinet of Ministers No.KM14 dated January 21, 2014 "On Approval of "the Regulation on Manual for Development and Approval of Environmental Permits".

The EIA procedure is subject to State Environmental Expertise. SEE is the process of establishing environmental compliance of a project and determining adequacy of environmental impact assessment conducted by the State Unitary Enterprise "Centre of State Environmental Expertise" or the regional bodies of the SEE of the State Committee on Ecology and Environmental Protection (the "Goskomekologiya") at both the national and regional levels, depending on the project category. The SEE Decree stipulates four categories of development within the SEE context, ranging from Category 1 (High Risk) to Category 4 (Local Impact). SEE categorized the Project as Category 1 development. EIAs for category 1 projects are to be submitted to the Centre of State Environmental Expertise.

Pursuant to the SEE Decree, the national EIA is a staged process and involves three major phases: (i) Draft Statement on Environmental Impact (at the planning phase prior to financing), (ii) Statement on Environmental Impact (if additional surveys are recommended by the SEE, before completion of the Feasibility Study) and (iii) Statement on Environmental Consequences (final step during the commissioning phase). Category 4 projects will need to complete Draft Statement on Environmental Impacts only and submit it to the SEE regional body of Goskomekologiya.

The national requirement specifies two non-mandatory mechanisms for consultation during the EIA process: the public environmental review (PER) and public hearings. PER might be undertaken by an independent expert panel and the opinion granted by PER will not have mandatory implications.

There is no official regulatory guidance as to which type of project requires a public hearing or how public hearings should be conducted. The EIA Procedure Manual provides some guidance. It recommends that public hearings are held when the draft EIA is ready and suggests few patterns of how organise such events and potential attendees.

The Law on Environmental Expertise (2020) states, that a project promoter could announce locally via mass media that the EIA procedure is underway and disclose the SEE findings for strategic facilities as defined by the Government. However, there is no specific legislation that guides the disclosure procedure. The SEE Decree specifies that results of public hearings and disclosure should be included in the EIA documentation to be submitted for SEE review. The Statement on Environmental Consequences shall detail *inter alia* all comments received through the public hearings, if undertaken.

Since the existing approach to public consultation in Uzbekistan does not involve extensive engagement of the general public and is sometimes limited to consultation with local authorities, rather than the general public, the approach to planning engagement and disclosure for the Project has been guided by GIP embodied in the applicable international requirements as summarised below.

2.3 Applicable International Requirements

According to EBRD and IFC/MIGA categorisation definition the Project is considered as Category A project.

A project is categorised A when its implementation may result in potentially significant adverse future environmental and/or social impacts, and therefore the project will require a comprehensive environmental and social impact assessment to international standard including stakeholder engagement and disclosure of ESIA findings to general public and key project stakeholders.

The Project categorisation is driven by the large geographical footprint, vulnerability of water resources in the Project area and other environmental risks associated with local community disturbance and possible livelihood restoration. In line with consultation and disclosure requirements of the International Lenders applied to category A projects a Project SEP needs to be developed and shall include a stakeholder grievance mechanism.

The specific financing institute requirements are elaborated in Sections 2.3.1 and 2.3.2.

2.3.1 EBRD Requirements

EBRD is committed to promoting environmentally sound and sustainable development in line with:

- EBRD Environmental and Social Policy (2019) and *PR10: Information Disclosure and Stakeholder Engagement*
- Access to Information Policy (2019)

The EBRD's ESP defines stakeholder engagement as an on-going process which involves the following elements: (i) stakeholder identification and analysis; (ii) stakeholder engagement planning; (iii) disclosure of information; (iv) meaningful consultation and participation; (v) an effective grievance procedure or mechanism, and (vi) ongoing reporting to relevant stakeholders. The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the project life.

For this Project EBRD requires that the Project will:

- Build disclosure and consultation requirements into each stage of the ESIA process
- Identify and document the various individuals or groups who are or will be directly or indirectly affected by the Project or may have an interest in it
- Define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for stakeholder engagement activities including implementation and monitoring
- Engage in a scoping process with interested parties and make sure that stakeholders are able to provide comments and recommendations on the draft SEP and other scoping documents.
- Develop and implement a Stakeholder Engagement Plan
- Disclose the Environmental and Social Action Plan (ESAP) and other documents to be prepared by the ESIA study to the affected parties in accordance with the SEP

- Keep the ESIA in the public domain throughout the life of the Project which may be amended from time to time, with additional information
- Provide annual reports to the Project stakeholders on E&S performance (as publication or via website) throughout the life of a project. These reports will be in a format accessible to the affected communities
- Disclose additional information at key stages in the project cycle (prior to construction start, start-up of operations, decommissioning)
- Inform the affected communities (ACs) if there are material changes¹ to the Project which result in additional adverse impacts or issues of concern and report how these impacts and issues are being addressed including disclosure of the Environmental and Social Management Plan (ESMP) in accordance with the SEP
- Carry out additional disclosure and consultation if additional adverse impacts on the ACs are significant
- Respond to stakeholders' concerns related to the Project in a timely manner
- Establish an effective grievance mechanism to receive and facilitate resolution of stakeholders' concerns and grievances. At a minimum this includes a grievance procedure, grievance register and communication to stakeholders on the existence and way to use this grievance mechanism.

Special provisions shall be made to allow disadvantaged or vulnerable groups or individuals to be informed about the Project and give their views on the Project where appropriate.²

2.3.2 IFC and MIGA Requirements

The IFC is known as the private sector arm of the World Bank Group. Public consultation, disclosure and stakeholder engagement are key requirements of the IFC's Policy on Environmental and Social Sustainability embodied within the Performance Standards. The eight IFC PSs are applicable to private sector projects in emerging markets. MIGA has adopted IFC PSs and requires compliance with PSs from their clients.

Each PS has specific consultation requirements, and these are embedded in the general requirements specified in PS 1: Assessment and Management of Environmental and Social Risks and Impacts. These requirements specifically refer to the need for and means of achieving community engagement, disclosure of relevant project information, appropriate consultation processes, grievance mechanisms throughout the project lifecycle and on-going reporting to ACs. The requirements for stakeholder engagement in projects are:

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

The IFC PSs seek to provide accurate and timely information regarding Project investment and advisory activities. The IFC's Access to Information Policy states that for Category A projects proposed for financing, a summary of review findings and recommendations must be disclosed and include as a minimum the following information:

- Reference to the Performance Standards and any applicable grievance mechanisms, including the compliance advisor/ombudsman
- The rationale for IFC's categorisation of the project

¹ A change that may significantly modify a project programme, scope or technology

² 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.

- A description of the main social and environmental risks and impacts of the project
- Key measures identified to mitigate those risks and impacts, specifying any supplemental measures and actions that will need to be implemented to undertake the project in a manner consistent with the Performance Standards
- Electronic copies or weblinks to any relevant ESIA Report prepared by the developer
- Any additional documents such as Action Plans, Stakeholder Engagement Plans, Resettlement Action Plans, etc.

3 Identification of Stakeholders and Communication Methods

3.1 Who are Project Stakeholders?

Stakeholders are persons or groups who are directly or indirectly affected by the Project, as well as those who may have interests in the Project and/or the ability to influence its outcome, either positively or negatively. Stakeholders for the Project may include locally affected communities and their formal and informal representatives, national or local government authorities, civil society organisations and groups with special interests, the academic community, or businesses.

3.2 Previous Stakeholder Engagement and Disclosure

Identification of the Project stakeholders have been initiated in the ESIA process through site surveys, desk-based research and consultations. Details of consultations held during the ESIA process are presented in Volume II of the ESIA Report, Chapter 5. A brief summary of the ESIA consultation process is provided below.

3.2.1 Scoping Phase Consultation and Disclosure

The ESIA scoping consultation was undertaken in March 2021 with the following Project stakeholders:

- Bukhara Region Hokimiyat
- Karakulsky District Hokimiyat
- Zhandorsky District Hokimiyat
- Alatsky District Hokimiyat
- Department for Ecology and Environmental Protection of the Bukhara Region
- Regional Directorate of the Cultural Heritage Department of the Bukhara Region
- Department of Land Resources and State Cadastre of the Bukhara Region
- Centre for Sanitary and Epidemiological Surveillance of the Bukhara Region
- Department for Investment and Foreign Trade of the Zhondor District
- Department for Ecology and Environmental Protection of the Zhondor District
- Forestry Administration of the Zhondor District
- Employment Centre of the Zhondor District
- Centre for Sanitary Control and Public Health of the Zhondor District
- Farmers Association of Zhondor District
- Department for Ecology and Environmental Protection of Alat District
- Department of Community and Family of the Alat District
- Centre for Sanitary Control and Public Health of the Alat District
- Farmers Association of Alat District
- Department of Community and Family of the Karakul District
- Forestry Administration of Karakul District
- Centre for Sanitary Control and Public Health of the Karakul District
- Local mahallas in Bandbashi, Kaimakchi and Utik Durmon communities

These meetings were used to disclose information about the Project, explain the forthcoming ESIA process, request data, identify associated projects and additional potential stakeholders and their interests, identify

opportunities and listen to any concerns raised about the Project. The key concerns defined relate to: land acquisition procedure, employment, community health and safety, security and wellbeing, vulnerable groups' involvement.

3.2.2 Impact Assessment Phase Consultation

Following the Scoping Phase disclosure the Project held another round of stakeholder engagement activities to inform the gaps in the social baseline, hold focus group discussions (FGDs) with the ACs (the rights-holders), consult with the regional and local and regional authorities (the duty bearers) and local Farmers' Associations (other stakeholders) on land acquisition and economic displacement, socio-economic census of the PAPs, and compensation methods, describe details of the land acquisition process for the Project as well as identify, discuss and plan livelihood restoration actions to be implemented by the Project.

Details of consultations held during the impact assessment phase are presented in Volume II of the ESIA Report, Chapter 5. A brief summary of the consultation process is provided below.

Nine focus group discussions were undertaken with rights-holders (men, women and young adults from local communities) in June 2020 in the Alat, Karakul and Zhondor districts. FGDs aimed at filling gaps in the baseline information, understanding livelihoods and incomes of men and women in the local communities and existing constraints, listening to their expectations and concerns, and sharing opinions of the Project. A short socio-economic survey in Uzbek was collected from all participants of the FGDs. These were collated and used along with the FGDs to inform the socio-economic baseline section of the ESIA Report.

The key benefit of the Project as perceived in the ACs is the opportunity for employment and having regular, stable and higher incomes. Women and young adults emphasised that the Project would bring them an opportunity to earn their own income in circumstances of high unemployment rates in the rural communities across the Project area and limited job opportunities currently available locally for these two vulnerable groups. Other anticipated benefits of the Project as articulated by the local communities, include:

- Skills development and knowledge sharing
- Obtaining new professions and advanced training
- Accumulating professional experience
- Retentions of the local labour force, especially young people
- Motivation of young people for education and foreign languages learning
- Social benefits associated with the development of the GCC
- Community development (new kindergartens and other social infrastructure, public services and amenities)
- Landscaping and more green spaces due to the presence of the Project
- More incomes for local small businesses and farmers (sale of meat, milk, and other agricultural products to the Project)
- Cheap final products of the GCC
- Broadening horizons of people in the local communities
- Development of tourism

Some concerns were also shared. Key concerns related to potential environmental impacts of the Project, risk of air pollution and odour emissions as with the other gas processing plant in the region, risks for the protected areas located nearby, generation of waste and garbage especially during the construction period, potential health impacts, lack of drinking water, pollution of groundwater, potential impact on soil fertility, less land for cattle grazing and impact of livestock business, safety risks for women and children during the construction period, non-availability of final products in the local market (only export), lack of information for communities about availability of new jobs or no jobs made available for local people at all, and GCC not constructed in the end.

Overall, all FGDs were very positive about the Project and found that ACs generally felt that it would be very beneficial for the region and local economy. Those living close to the Project (in the Karakul district) were expecting to become GCC employees or get jobs at the construction site. However, there are some restraints to people being able to take up Project opportunities. In the opinion of the ACs these include lack of required skills and work experience, distance (specifically for the communities located in Alat and Zhondor districts, no direct road to the Project site to allow quick access to the future GCC and construction site, poor or no knowledge of foreign languages (Russian and/or English), high unemployment rates and potential high competition in getting a job at the GCC.

FGDs also proposed that the best way to communicate any news about the Project, including advertisements on availability of new jobs, as well as arrange and plan future consultations is to be via the mahalla centres (to include those who do not use internet and smartphones).

Meeting with non-community stakeholders were also held in June 2021. Consulted stakeholders included Amu-Bukhara Irrigation Canal No.1, Farmers' Association in the Zhondor district, Bukhara Regional Department for Ecology and Environment and Amu-Bukhara Catchment Authority for Irrigation Systems. These meetings were used to disclose information about the Project and the ESIA process, request information for the baseline sections and understanding stakeholder interests in the Project.

The Project is about to finalise the routes of the gas pipelines which may potentially cross the fields of the local farms. As the Project is committed to compliance with international standards a Livelihood Restoration Plan (LRP) will be developed to guide the land acquisition process to align with international requirements and propose measures for restoring affected livelihoods. To inform the LRP and the assessment process a round of consultation and FGDs with the affected farmers will be undertaken at the end of the planning process. Respective updates will be included in the ESIA Report upon completion of the consultation process with the farmers and inform the LRP.

3.2.3 ESIA Disclosure Consultation

The COVID-19 restrictions were lifted in the ACs in the Project region allowing for public meetings in Alat, Karakul and Zhondor Districts at the end of September 2022 to disclose the findings of the ESIA process.

Prior to the ESIA disclosure presentation to the ACs and other Project stakeholders, adverts were placed in local newspapers, the Project website, Telegram messaging service and Bukhara regional mass media that the Draft ESIA documentation was available for review identifying where to locate the documents and how to submit comments. A notification letter was sent to Hokim of the Bukhara region with a copy to Hokimiyats of Karakul, Zhondor and Alat districts. (see Volume III of the ESIA Report, Technical Appendices).

The Draft ESIA Report, NTS and SEP in Uzbek language were posted on the Project website (<http://uzmto.com>) and made available in hard copies in the public buildings of Hokimiyats in Karakul, Zhondor and Alat districts and the nearest settlements via mahalla of Bandbashi, Kaymakchi and Utik Durmon. Comment boxes and feedback forms in Uzbek language were provided in each location to allow for anonymous comments to be submitted.

The public meetings were held between 28 and 29 September 2022 r. in District Hokimiyats of Karakul, Zhondor and Alat). The Project presentation (see Volume III of the ESIA Report – Technical Appendices) discussed the need for the Project and its current status, selected technology, details of the construction phase, predicted beneficial effects of the Project and adverse impacts and risks identified in the ESIA process, and proposed mitigation measures. Members from the ACs were given the opportunity to share their opinions of the Project, ask questions and voice their concerns. Information on the Project's grievance redress mechanism, communication and information disclosure was also shared during the public meetings.

The feedback demonstrates a largely positive perception of the Project presence in the ACs. Key perceived benefits are associated with the new job opportunities, better employment, regular incomes and, as a result, improved livelihoods in the ACs. People from the ACs were keen to understand what equipment will be used

by the Project, what jobs will be made available for the ACs and how these will be advertised. Local businesses express their interest in purchasing the final products of the GCC.

The concerns were voiced by communities and other Project stakeholders. These include air emissions by the Project, size of the sanitary protection zone and potential community health impacts due to the presence of the Project site.

Public meeting also proposed that the Project supports improvement of the social infrastructure in the ACs, as well as undertake landscaping and increase in the green area around the GCC by planting more trees.

Four comments were received via the comment boxes in the Karakul District from four male members of the ACs. One comment proposed that the Project provides more jobs to people from the ACs. The second comment was against the Project and the presence of the GCC site due to potential health issues for the local people. The third comment requested clarification about adverse and beneficial effects of the Project. A response has been provided via Telegram explaining benefits and potential adverse impacts of the Projects summarised in the Project leaflet. And the final comment suggested that potential environmental impacts would be insignificant.

No grievances were received from communities via the grievance mechanism during the ESIA disclosure period.

All of the aforementioned issues have been considered by the impact assessment and respective comments have been provided to these identified concerns and suggestions with the reference to mitigation measures envisaged in the ESIA and ESMMP. Details of the comments and feedback are provided in Volume III of the ESIA Report – Technical Appendices.

Comment boxes and feedback forms were available in the respective locations till 15 October 2022.

3.3 Stakeholders Analysis

The initial list of stakeholders was categorised subject to their dependence on and influence over the Project. In this context dependence is defined as the degree to which a stakeholder is reliant upon the Project achieving its aim of producing and selling olefins³. Whereas influence is defined as the formal power a stakeholder has over the Project, and its capacity to achieve its aim. These definitions and the descriptors shown in **Table 3.1** and **Table 3.2**, for dependence and influence respectively, are adapted from AccountAbility's 2005 Stakeholder Engagement Manual.

Table 3.1: Descriptors of Stakeholder Dependence

Dependence	Description
High	Stakeholder is highly dependent on the project achieving its aim and will be significantly and directly affected by the outcome (positive or negative)
Medium	Stakeholder may be indirectly affected by the project outcome (positive or negative) but any impacts are unlikely to be significant
Low	Stakeholder may be indirectly affected by the project outcome (positive or negative) but any impacts will be insignificant

Source: AccountAbility (2005).

Table 3.2: Descriptors of Stakeholder Influence

Influence	Description
High	Stakeholder has a high degree of formally recognised power, which is relevant to the project and as such can: Remove or grant its license to operate Restrict or provide access to investment funds; and Restrict or provide access to resources, operating sites, research or data

³ Low density polyethylene, ethylene vinyl acetate, ethylene vinyl acetate, polypropylene

Influence	Description
Medium	Stakeholder has some degree of formally recognised power (although this may not be directly relevant to the project) and therefore may be able to influence the project's progress
Low	Stakeholder has no formally recognised power over the project or its ability to achieve its aim

Source: AccountAbility (2005).

Once the dependence and influence of the stakeholder has been established Table 3.3 can be used to further classify the stakeholder into one of the following categories:

- **Primary Stakeholders:** those who are likely to be directly affected (positively or negatively) by a project. This category typically includes local populations, particularly poor and marginalised groups who have traditionally been excluded from participating in development efforts.
- **Secondary Stakeholders:** those who influence a development intervention or are indirectly affected by it. This typically includes, civil society organisations, private sector firms, the Bank and its shareholders and other development agencies
- **Tertiary Stakeholders:** More indirectly affected by the project than secondary stakeholders. Those who show interest in the project and would like to be kept informed of the project as it progresses. These stakeholders may also provide necessary project information and may be able to influence a project.

Table 3.3: Determining Stakeholder Category

Stakeholder Dependence on the Project	Stakeholder Influence on the Project		
	Low	Medium	High
High	Primary Stakeholder	Primary Stakeholder	Primary Stakeholder
Medium	Primary Stakeholder	Secondary Stakeholder	Secondary Stakeholder
Low	Primary Stakeholder	Secondary Stakeholder	Tertiary Stakeholder

Source: Mott MacDonald

3.3.1 Primary Stakeholders

The communities of Karakul, Alat and Zhondor districts situated in close proximity (within 10 km radius) to the proposed Project are therefore likely to experience direct, significant impacts (both positive and negative) during construction. However, the communities have little to no formally recognised power over the Project. Therefore, these communities are categorised as having a high dependence but low influence, making them a **primary stakeholder**.

Similarly, beneficiaries of the Project are also likely to experience direct and significant impacts to the way they are given work opportunities during construction and operation but have little formally recognised power over how and when this will happen. As a result, the Project beneficiaries are categorised as **primary stakeholders**.

Vulnerable peoples embedded within the affected communities and the beneficiary population are also likely to be highly dependent on the project as traditionally they are more likely to be adversely affected by the project impacts, and/or are more limited than others in their ability to take advantage of a project's benefits due to their social status. This stakeholder group has very little influence over the project, arguably even less than the rest of the affected population, and it therefore regarded to be a **primary stakeholder**.

Those, if any, displaced by the project, physically or economically, will also experience significant and direct impacts. This combined with a low degree of influence due to a lack of formal power makes this group a **primary stakeholder**.

3.3.2 Secondary Stakeholders

Those who influence a development intervention or are indirectly affected by it. This typically includes, civil society organisations, private sector firms, the Bank and its shareholders and other development agencies

3.3.3 Tertiary Stakeholders

No tertiary stakeholders have been identified at this stage.

3.3.4 Summary of Analysis

At this stage, the Project has identified nine groups of primary and secondary stakeholders, and suggested communication and consultation methods for each group as summarised in Table 3.4.

The Project recognises that marginalised and disadvantaged groups are likely to experience impacts differently from the mainstream society. Consultation activities will be used to gather information and opinions on how different groups are affected. Project consultation and information disclosure will take into consideration logistical and cultural factors such as language, physical access, literacy levels, and time availability of these groups.

If you are a stakeholder who has not been identified in the table below but would like to be kept informed about the Project, please contact the Project CLO at the address provided in Chapter 5.

Table 3.4: Project Stakeholders and Engagement Methods

Stakeholders Identified	Status					Engagement Methods																
	Primary	Secondary	Affected	Interested	Decision-makers/regulators	Face-to-face meeting	Formal communications	ESIA Disclosure Package	Public Exhibition Event	Disclosure of the Project leaflet	Disclosure of the Project HR Policy	Engagement with PU Managers	Engagement with the Project CLO	Engagement with EHS Officer(s)	Engagement with HR Manager	Community grievance mechanism	Workers' grievance mechanism	Monitoring missions	Progress and monitoring reports	Livelihood Restoration Plan	Project website	
(I) Project affected communities, vulnerable and marginalised groups																						
● Residents of Karakul, Alat and Zhondor districts in Bukhara region, including vulnerable and disadvantaged groups:	x	x						x	x	x	x		x			x					x	
– disabled	x		x					x	x	x			x			x					x	
– elderly	x		x					x	x	x			x			x						
– the poor	x		x						x	x			x			x					x	
– unemployed	x		x					x	x	x	x		x			x					x	
– women and female-headed households	x		x					x	x	x			x			x					x	
– children under 15 years old	x		x						x	x			x			x					x	
● Local farmers who will be displaced by the Project	x		x					x	x	x	x		x			x				x		
(II) Employees, job seekers and non-employee workers and their representatives																						
● Local residents	x		x					x	x		x	x	x	x	x		x				x	
● Employees of GAS CHEMICAL COMPLEX MTO CENTRAL ASIA, LLC	x		x					x	x		x				x		x					
● Construction workers	x		x								x			x	x		x		x			
● Trade Unions and employee representatives	x			x		x	x	x	x		x		x	x	x		x				x	
(III) International Lenders																						

• MIGA	x		x	x	x	x	x		x		x	x	x
• Lenders group	x		x	x	x	x	x		x		x	x	x
(IV) International Organisations													
• International Labour Organization	x	x				x					x	x	
(V) National, Regional and Local Governments and Authorities													
• Ministry of Energy of the Republic	x		x	x	x	x	x		x	x			
• Ministry of Employment and Labour	x		x	x	x	x	x		x	x			
• Bukhara Region Hokimiyat	x		x	x	x	x	x		x			x	
• District Hokimiyats (Karakul, Alat, Zhondor districts)	x		x	x	x	x	x		x			x	
• Coordination councils of citizens self-governance (mahallas)	x	x		x	x	x	x	x	x			x	
• Local environmental authorities	x	x		x	x	x	x		x	x			x
• Local labour and employment authorities	x	x		x	x	x	x		x				x
• Regional Directorate of the Cultural Heritage Department of the Bukhara region	x												
(VI) Consultants													
• UZLTI-Engineering	x	x			x	x			x				x
• Mott MacDonald Limited and Ekostandart Ekspert	x	x			x	x							x
(VII) Civil society and non-governmental organisations (NGOs)													
• Uzbek-German Forum for Human Rights	x	x			x	x	x		x			x	x
• Anti-Slavery International													
• International Labour Rights Forum													
• Uzbekistan's Women Committee													
• Others (to be identified through SEP disclosure)													
(VIII) Suppliers, Contractors and Private Businesses													
• Local suppliers	x	x			x	x			x	x	x	x	x
• Local contractors	x	x			x	x			x	x	x	x	x
• Other businesses (to be identified through SEP disclosure)	x	x				x							x
(IX) Other stakeholders													
• Local public newspapers, local radio, local TV channels	x	x			x	x	x		x				x

4 Stakeholder Engagement Programme

4.1 Overview

The stakeholder engagement activities serve two key purposes:

1. Disclosing appropriate information about the Project – Disclosure of relevant Project information helps stakeholders understand the risks, impacts and opportunities of the Project. Consultation activities are more informed and constructive if stakeholders have accurate and timely information about the Project, its potential environmental and social impacts, how these will be avoided or mitigated, and how the Project's positive impacts will be maximised.
2. Providing relevant stakeholders with the opportunity to voice their opinions, preferences and grievances – This enables participation and involvement in the planning and design process and the enhancement of proposed impact mitigation measures.

The various engagement and disclosure activities to be undertaken for the Project are based on principles of inclusion and continuity as well as comply with the applicable EBRD and IFC/MIGA requirements for category A projects.

4.2 Gender considerations

The EBRD and IFC/MIGA expect their clients to identify any potential gender-specific and disproportionate, adverse impacts, and undertake mitigation measures to reduce those. Where relevant, clients will be requested to enhance the positive gender impact of projects by promoting equality of opportunity and women's socio-economic empowerment, particularly with respect to access to finance, services and employment.

Currently in the Cabinet of Ministers of Uzbekistan there is a position of Deputy Prime Minister responsible for protection of women's rights and interests; similar positions have been created at all subnational government levels. The Government of Uzbekistan focuses on both supporting the role of women in all areas of social life and social protection of women at work.

Uzbekistan is not included into the 2020 Gender Gap Index due to the lack of gender statistics. In Women, Business and the Law index Uzbekistan was given 67.5 by the World Bank Group, showing the lowest scores in pension, pay and workplace indicators. The average global score is 75.2, up from 73.9 as measured in 2017. Uzbekistan economy shows better index, than Jamaica, Indonesia and Egypt, but worse than all the CIS countries.

The key NGOs focusing on gender issues have been identified as stakeholders (also included in Table 3.4) and will be continuously engaged throughout the Project in line with this SEP.

4.3 Inclusion and Continuity

The consultation process will capture both men and women's views and reflect their different concerns and priorities about impacts, mitigation mechanisms, and benefits. Consultation and disclosure will be carried out as a continuous process throughout the design, construction and operations phases of the Project.

All communication and disclosure will be in Russian/Uzbek language. Local communication channels and public mass media will be used to enable accessibility of information to the greatest number of people. Different forms of media such as television and radio will be used to communicate information to those with literacy problems.

4.3.1 Web resources

The Company's website (<http://uzmto.com>) will be used to advertise the Project documentation, report on the progress and publish relevant news of interest to the public about the Project.

4.4 Community Liaison Officer

The Project has identified a Community Liaison Officer (CLO) who will be responsible for community liaison and arranging communications with project affected communities in the Project region. The CLO will be constant throughout the Project and will be largely responsible for implementation of the SEP, particularly receiving and channelling comments and concerns during Project preparation phase and management of the community grievance mechanism during the construction and operational phases. The CLO will also attend and record stakeholder engagement activities and maintain lines of communication with the ACs.

4.5 Specific approach during COVID-19 Restrictions

A risk of pandemic outbreak exists, and it is predicted to be medium for Uzbekistan as vaccination has already started by the Government but only 8.4 persons have been vaccinated with at least one dose (as of 6 November 2021⁴). Potential COVID-19 pandemic restrictions that may coincide with the active stage of the ESIA consultation, have been taken into account. Alternate plans for stakeholder engagement and disclosure have been included in the engagement programme in Table 4.1 so that traditional consultation approaches could be substituted, if required.

Due to limited access to internet and smartphones in Uzbekistan⁵ and the Project affected areas, alternate approaches for engagement with the ACs will include disclosing information by Project flyers and feedback forms. The focus on television communications with the ACs will promote wider dissemination and outreach.

Other interested stakeholders (non-ACs) have sufficient access to online services and telephone connectivity. A preferred option for engagement with this group will involve e-mails, conference calls and on-line meetings and the Project during the COVID-19 crisis.

Should any new restrictions or circumstances apply to the Project in the longer term, the engagement strategy and methods will be reconsidered by the Project and the SEP updates will be disclosed to all interested stakeholders.

4.5.1 Attention to vulnerable groups

Elderly and disabled members of the community may find it difficult to access information online which will be one of the preferred options during COVID-19 restrictions. There may also be mobility restrictions on these stakeholders which could impact their ability to access hard copies of documentation and feedback forms. As such, engagement channels will include TV adverts, mahallas centres to display Project information and dedicated telephone line communication (via Project CLO) to receive comments and / or grievances.

Women within the local communities may also be restricted in relation to time which can be allocated to attending consultation and accessing information. Information will readily be available in mahallas and can be accessed at convenient timeframes that can accommodate family life and household responsibilities. The CLO will monitor feedback from vulnerable groups and additional ways of engaging them in the decision-making process will be developed as required. Project information and feedback forms will also be available online so that young people with good access to online resource are engaged in the consultation process.

4.6 Engagement Programme

Table 4.1 below outlines the sequence, timing and responsibilities of disclosure and consultation activities for the Project.

⁴ <https://covid19.who.int/region/euro/country/u>

⁵ In 2018, smartphone penetration in Uzbekistan stood at just over 30% and the number of internet users was around 52%.

Table 4.1: Stakeholder engagement timescales and responsibilities

Activity	Timing / Detail	Responsibility	Alternative Approach during COVID-19
1) Scoping Phase Engagement			
Engagement with the key Project stakeholders during the ESIA scoping phase	March 2021 (completed). Meetings to disclose information about the proposed investment, receiving views and comments about the Project from key stakeholders, data collection to inform the Scoping Report.	The Consultant.	No changes required.
Disclosure of the ESIA Scoping Report and SEP	By 30 April 2021. Documents to be disclosed in Uzbek language. Adverts to be placed for one week in local newspapers, on TV and the Company's website that the ESIA Scoping Report and SEP are available for review identifying where to locate the documents and how to submit comments. The ESIA Scoping Report and SEP will also be disclosed via e-mail to interested stakeholders and made available in hard copy upon request. Project leaflet in Uzbek language with a summary of the Project scoping findings will be made available in hard copy in the ACs via mahallas.	The Consultant will prepare documents in English and Russian. The Project will prepare SEP in Uzbek language. The Consultant will prepare the Project leaflet in English and Russian. The Project will prepare an Uzbek version. The Project CLO to disclose ESIA Scoping Report and SEP to key Project stakeholders, publish at the Company's website (and make them available in hard copies upon request). The CLO to disclose the Project leaflet in hard copies in the ACs via mahallas.	No changes required.
Comments on SEP and ESIA Scoping Report	Feedback collection will stay open till 30 June 2021. All comments will be received via the Project CLO and forwarded to the Consultant for consideration and inclusion in the ESIA documentation. Responses will be provided to each interested party presenting questions as soon as is reasonably possible depending on the complexity of the issue and source of information needed to provide the answer.	The Project CLO and Consultant.	No changes required.
2) ESIA Phase Engagement – Draft ESIA Report Disclosure			
Engagement with the key Project stakeholders during the ESIA assessment phase	May-June 2021. Consultation with the District Hokimiyats and Farmers Associations to collect baseline information of the affected farmers and understand the land acquisition process, status and eligibility. Focus group discussions with the ACs to understand livelihood groups and incomes. Consultations with the affected farmers.	The Consultant.	On-line consultations. Questionnaires (e-mails or mobile applications or hard copies via mahallas).
Announcement of the forthcoming disclosure of the draft ESIA package (NTS, ESIA)	Two weeks prior to Draft ESIA Report presentation at the public exhibition event (28-29 September 2022).	The Project CLO and Consultant.	Within two weeks of the disclosure of the ESIA package:

Activity	Timing / Detail	Responsibility	Alternative Approach during COVID-19
Report with appendices, ESMMP, SEP and other related documents) and the planned public exhibition events in Karakul, Alat and Zhondor districts of Bukhara region	<p>Adverts to be placed in local newspapers, on local TV, the Company's website and in District Hokimiyats and mahallas for one week identifying dates and locations of the disclosed documents and the public exhibition events, and how to submit comments. Adverts will include links and addresses where draft ESIA Report and NTS will be accessible in electronic and hard copies.</p> <p>Letters of invitation to Hokimiyats, mahallas, environmental authorities, NGOs and other Project stakeholders if relevant.</p>		<ul style="list-style-type: none"> • Adverts will be place in local newspapers and TV, the Company's website and District Hokimiyats websites identifying the online locations where the ESIA package has been disclosed and notifying the local affected communities of the forthcoming delivery of project leaflets and feedback forms to nearest mahallas. • E-mail invitations for a video-call (zoom conference) with interested NGOs and other stakeholders to be sent two-weeks prior to such video-call occurring.
Disclosure of the Draft ESIA Report and related documents	<p>At least two weeks prior to the public exhibitions, for 60 days (15 August 2022).</p> <p>NTS document t to be disclosed in Uzbek via the Project website and made available in Uzbek in hard copy in the ACs via mahallas in the same locations as the Scoping Report and SEP. Comment boxes and feedback forms will be provided in mahallas to allow for anonymous comments to be submitted.</p>	<p>The Consultant to prepare NTS and Draft ESIA Report in English and Russian. The Company will prepare NTS in Uzbek language.</p> <p>The Project CLO to post documents on the Company's website, District Hokimiyats' websites in Karakul, Alat and Zhondor districts and take NTS to the mahallas in hard copies with comment boxes and feedback forms in same locations used to disclose the Scoping Report and SEP.</p>	<ul style="list-style-type: none"> • Hard copies will not be available in public places due to the risk of cross contamination with COVID-19.
Public exhibition events and focus groups	<p>28-29 September 2022.</p> <p>Project exhibition events will be arranged in three Project districts in Bukhara region. Events to be held in District Hokimiyats. Exact dates and time to be confirmed by the Consultant and agreed with the Company.</p> <p>Location and date to be announced in advert/announcement as detailed above. Separate invitations will be sent to women's affair committees in mahallas as women's representatives to facilitate their participation in the exhibitions and discussions in focus groups.</p> <p>The Company assisted by the Consultant to present information about the Project and the findings of the ESIA as well as proposed mitigation measures.</p> <p>A comment boxes and feedback form will be provided to allow for anonymous comments to be submitted.</p> <p>Follow-up focus groups with women will be arranged in the Project districts after the exhibition events.</p>	<p>Events arranged and advertised by the Company with support from the Consultant.</p> <p>Events attended by the Consultant, Project CLO, representatives of the Company including the Project Manager, Environmental Specialist, Health and Safety Engineer and other staff as deemed appropriate.</p> <p>The CLO to record meetings, attendance and collect feedback forms and report outcomes to the Consultant.</p> <p>The Consultant to lead the focus groups and report on findings.</p>	<p>Within four weeks of the disclosure of the ESIA package (NTS, updated SEP and Project flyer will be also published in Uzbek language) via the Project site and District Hokimiyats' websites in the Project districts:</p> <ul style="list-style-type: none"> • Project leaflet and feedback forms in Uzbek language to be distributed to local affected communities through their mahallas and CLO details will be published and pasted in mahallas' offices. • Comment boxes will be provided in mahallas to allow for comments (including anonymous comments) to be submitted using the ESIA feedback form distributed to the ACs. • Hard copies will not be available in public places due to the risk of cross contamination with COVID-19.

Activity	Timing / Detail	Responsibility	Alternative Approach during COVID-19
Collecting comments and suggestions on the Draft ESIA Report	<p>Via grievance mechanism for the disclosure period after public exhibition event (till 15 October 2022).</p> <p>Feedback received by the Company to be forwarded to the Consultant for consideration by technical specialists and inclusion in revised the ESIA Report and/or related documents.</p> <p>Responses to be provided to each interested party presenting questions as soon as is reasonably possible depending on the complexity of the issue and source of information needed to provide the answer.</p>	The Project CLO to collect and feedback to the Consultant.	<p>Feedback and comments on the ESIA Package will be collected via feedback forms, which will be distributed to the households in the local affected communities.</p> <p>Anyone can provide their comments (including anonymously) by sending back the feedback form via postal mail or electronic mail, or by calling the CLO.</p> <p>Feedback boxes will also be available at the local mahallas.</p>
Media communications	As requested, or when press releases deemed relevant.	The Project CLO.	<p>This activity will be increased to ensure wider dissemination and outreach during the period when COVID-19 restrictions are in place.</p> <p>Regular updates will be shared via local radio and TV in respective districts.</p>
Disclosure of the Final ESIA package	<p>After the ESIA disclosure period is ended (total 60 days):</p> <ul style="list-style-type: none"> Full ESIA disclosure package in Russian and English to be disclosed via the Project website. Final NTS and SEP in Uzbek Language to be made available in hard copy in the ACs via mahallas in the same locations used for disclosure of the draft documents. 	<p>The Consultant to prepare the Final ESIA disclosure package in English and Russian. The Company will arrange Uzbek versions of Final NTS and SEP.</p> <p>The Project CLO to post documents on the Project websites, make available in hard copy upon request as well as take Final NTS and SEP in Uzbek language to the mahallas in hard copies.</p>	Hard copies will not be available in public places due to the risk of cross contamination with COVID-19.
Lenders Disclosure	Draft ESIA Report and related documents to be disclosed by Lenders in English and/or links to Company's disclosure provided.	The Consultant to prepare the English version of the Draft and Final ESIA disclosure package.	No changes required.
3) Construction Phase Engagement			
Ongoing community liaison and grievance logging, resolution and reporting	<p>Communications with the ACs via mahallas.</p> <p>Weekly grievance reporting the Company and Branch Management.</p> <p>Prior to the start and end of construction, and other key changes to inform the ACs on likely impacts and mitigation.</p> <p>Disclosure of leaflets with construction schedules to the ACs.</p>	<p>The Project CLO.</p> <p>The EPC Contractor.</p>	<p>Distribution of the Project updates via e-mail or Telegram notifications to mahallas.</p> <p>E-mail communications on grievance reporting.</p> <p>Construction schedule updates to mahallas via messengers (e.g., Telegram notifications), e-mail and Project website.</p>
Regular updates on the Project website, social media, in newspapers and on radio	<p>Updates when activities change, milestones are reached, etc.</p> <p>Provision of public domain information (via Project website, newspapers, TV and radio) as it becomes available, such as information on management of construction impacts, monitoring reports and annual reports.</p>	The Project CLO.	<p>Updates via Project site and Telegram notifications.</p> <p>Public domain information via popular local TV channels.</p>

Activity	Timing / Detail	Responsibility	Alternative Approach during COVID-19
			Publication on monitoring reports and annual reports on the Project website. A link to the Project site to access monitoring reports and annual reports to be provided by the Project CLO to the mahallas via e-mail communication or Telegram group.
Updating Environmental and Social Management and Monitoring Plan (ESMMP)	Regular updates of the ESMMP during the construction phase.	The Company. The EPC Contactor.	No changes required
Updating SEP	Prior to the start and at the end of construction, when any changes to the Project programme, technology or stakeholders occur. Upload updated versions to the Project website.	The Project CLO.	A link to the Project site to access the updated SEP to be provided by the Project CLO to the mahallas via e-mail communication or Telegram group.
Annual Reporting	Project specific annual report summarising Project performance, CLO' activities including grievances and updates to the SEP.	The Company.	No changes required.
4) Operation Phase Engagement			
Grievance logging, resolution and reporting	Bi-annual grievance reporting to the Company.	The Project CLO.	No changes required.
Updating SEP	Annually for the duration of the Loan Agreement.	The Project CLO.	No changes required.
Annual reporting	Annual E&S Reporting to International Lenders	The Company.	No changes required.

5 Public Grievance Mechanism

5.1 Overview

Having a grievance mechanism is a national⁶ and international requirement the Project needs to comply with. Like all good grievance mechanisms, this one permits anonymous complaints, respects the confidentiality of the complainant(s) involved, and protects both the complainant and the Project from retaliation. The public grievance mechanism is based on the principles of being legitimate, accessible, predictable, equitable, and transparent, rights compatible, and dialogue based. The grievance mechanism can help identify critical issues, encourages learning and identifying 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, the Project will work proactively towards preventing grievances through the implementation of impact mitigation measures (as identified by the ESMP) and community engagement. 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 on the quality of life. They may also submit comments and suggestions. The sections below consider confidentiality and anonymity and the Project's grievance resolution process.

5.2 Confidentiality and Anonymity

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

5.3 Grievance Reporting and Resolution

The Company has own web resource (<http://uzmto.com>) and will use it to disclose information on the Project, advertise engagement events and the Project will establish and provide an operational mechanism to communities to send their feedback or grievances. Grievances may also be submitted via the Project CLO. The CLO's contact details are provided in Table 5.2.

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

Receive and record / acknowledge: grievances will be logged in a formal logging system for which the CLO will be responsible. People may register grievances using the form in Appendix A or by contacting the CLO directly, reporting to their settlement representative or online using the Project website. Contact details for the CLO will be included in appropriate Project communication materials such as the Non-Technical Summary document.

Categorise: the CLO will classify grievances according to Table 5.1.

Investigate: where investigations are required, Project staff and outside authorities as appropriate, will assist with the process. The CLO will collaborate with the Company 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.

⁶ RoU Law "On Appeals from Individuals and Legal Entities" of 03.12.2014 No.378.

Respond/follow-up/close out: the CLO will explain in writing to the complainant (or where literacy is an issue orally) the review process, the results, any changes to activities that will be undertaken to address the grievance and how the issue is being managed to meet appropriate environmental and social management systems. 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.

Table 5.1: 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 3 days and conduct an investigation if required. The CLO will document findings and provide a response within 14 days of receiving. 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 3 days. The CLO and an appropriate investigation team will conduct investigation. The Site Manager or Environmental, Health and Safety (EHS) Officer may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response within 14 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 3 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 14 days of receiving complaint. If more time is needed to complete the investigation this will be communicated to complainant within 14 days of receiving complaint. The CLO will provide a response within 30 days. 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.

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 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 Project affected persons and stakeholders. The grievances processing procedure is depicted in Annex B.

The Project has nominated Nazira Irrakhim kizi Yuldasheva to act as the Project CLO and point of contact for grievances and comments from the ACs and other stakeholders. Grievances and comments should be sent to the contacts below, where possible by using the form provided in Appendix A.

Table 5.2: Project Community Liaison Officer

Contacts	Project CLO
Name:	Yuldasheva Nazira Ibrakhim Kizi
Name:	40 Shkhrisabz Str, Tashkent 100081, Republic of Uzbekistan
Tel.:	+998 (71) 120-32-87 ext. 13118
Email:	Nazira.yuldasheva@uzmto.uz
Language of communication:	Russian, English, Uzbek

6 Monitoring and Reporting

6.1 SEP Reviews and Updates

Successful stakeholder engagement is on-going throughout the Project and requires performance monitoring, analysis, reporting and disclosure allowing adaption to changing circumstances and stakeholder information needs. The SEP will be reviewed by the CLO throughout the Project planning phase as deemed necessary or at least monthly, before and after the Project construction phase and annually once the Project is operational in order to assess whether:

- Type of consultation and disclosure activities are appropriate for different groups of stakeholders
- The frequency of consultation activities is sufficient
- Grievances are being adequately dealt with, and
- 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.

6.2 Grievance Reporting

The CLOs' reporting will include:

- Monthly grievance reporting to the Company at the Project planning phase
- Weekly grievance reporting to the Company during the Project development phase
- Biannual grievance reporting to the Company during the operation phase, and
- Annually to inform Annual E&S Report to the International Lenders (for the duration of the Loan Agreement).

6.3 Annual Reporting

A Project specific Annual Report to the International Lenders will be produced for the duration of the Loan Agreement summarising Project EHS performance, ESMMP progress, CLO activities including grievances, SEP progress and updates.

6.4 Project Environmental and Social Management Plan

As part of the ESIA, an ESMP will be prepared to detail specific monitoring and reporting requirements for environmental and social performance of the Project.

6.5 Performance Evaluation

The Company will implement the SEP and evaluate performance against the goals and objectives set out in this SEP (Project CLO and the Company management). 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.

The following initial indicators will be used for monitoring and improving stakeholder engagement performance in support of Project implementation and to ensure compliance with international standards / requirements:

- Number of publications on the Project implementation process in local, regional, and national media
- Number and types of stakeholder groups
- Number and frequency of the stakeholder engagement activities

- Number of stakeholder comments and suggestions received through various feedback channels
- Type/category of stakeholder comments and suggestions addressed by the Company and communication channels
- Number of stakeholder grievances and claims regarding the Project
- Key categories of community grievances received (environmental issues, disturbance, etc.)
- Number of community grievances resolved, outstanding and appealed
- Key categories of workers' grievances received (labour conditions, PPE supply, salary delays, etc.)
- Number of workers' grievances resolved, outstanding and appealed.

Appendices

A.	Grievance Form	26
B.	Flow Chart to Process Grievances	27

A. Grievance Form

Public Grievance Form	
Reference Number:	
<p><i>Please enter below your contact information and grievance. This information will be dealt with as confidential. If you still wish to remain anonymous, please enter your comment / grievance in the box below without indicating any contact information – your comment / grievance will still be considered and addressed. Please be advised that no response or feedback will be provided to anonymous grievance forms.</i></p>	
Full Name	
Contact Information	By Post: Please provide mailing address
Please identify how you wish to be contacted (mail, telephone, e-mail)	By telephone: By e-mail:
Preferred language of communication?	<input type="checkbox"/> Uzbek <input type="checkbox"/> Russian <input type="checkbox"/> Other (please specify)
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	
	<input type="checkbox"/> One-time incident/grievance (date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see to resolve this problem?	
Please return this form to: Project CLO _____ _____	
<i>Internal Use Only</i> Grievance received by: _____ Date: _____	

B. Flow Chart to Process Grievances

Figure B.1: Flowchart for Processing Grievances



