

Stakeholder Engagement Plan

Tbilisi Waste Treatment project - Georgia

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GLOSSARY

EBRD	European Bank for Reconstruction and Development
ESP	Environmental and Social Policy
EU	European Union
GBVH	Gender-based violence and harassment
IFI	International financial institution
MBT	Mechanical-biological treatment
MRF	Material Recovery Facility
NGO	Non-governmental organisation
PR	Performance Requirement
SEP	Stakeholder Engagement Plan

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INTRODUCTION

1.1. Overview

The European Bank for Reconstruction and Development (the EBRD or the Bank) is considering providing financing to the Government of Georgia to invest in the construction of a waste treatment facility at Didi Lilo sanitary landfill (the Project) in Tbilisi.

Tbiliservice Group Ltd. (the Company), fully owned by Tbilisi City, is responsible for solid waste management, street lighting, street cleaning and underpass maintenance services in Tbilisi.

The Project will help to set up the first ever waste treatment plant in Tbilisi, aiming at diverting waste sent to the sanitary landfill and potential mechanical-biological treatment plant. It is expected that the proposed Material Recovery Facility (MRF) will enable Tbilisi to further sort and process dry recyclables that are going to be collected separately (i.e. metals, glass, plastic packaging, paper and cardboard) and to prepare recyclables to be sold as secondary raw materials to companies. If feasible, a mechanical-biological treatment (MBT) plant will help to reduce waste quantities going to landfill via biodegradation of mixed municipal waste and sorting out recyclables.

This document is a Stakeholder Engagement Plan (SEP) for the Project, identifying relevant stakeholders and defining communication channels and plans of Tbiliservice Group Ltd.

The SEP is based on national legislation, EBRD Performance Requirement 10: Information Disclosure and Stakeholder Engagement, European Union (EU) directives and international best practices related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a living document and will be reviewed periodically during project implementation and updated as necessary to reflect new or modified activities, changes in project design, or newly identified stakeholders.

1.2. Objectives of this Stakeholder Engagement Plan

This SEP is a strategy document that will be used to outline an approach to consultation and disclosure that is both thorough and culturally acceptable. The goal of this SEP is to establish a framework for the Project's consultation and engagement approach, which will include the following:

- defines the applicable legal requirements concerning disclosure and consultation;
- identifies stakeholder groups that could be affected or may have an interest in Tbiliservice Group Ltd services;
- ensures that such stakeholders are appropriately engaged through a process of information disclosure and meaningful consultation on issues that could potentially affect them;
- maintains a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during the implementation of the Project;
- provides a grievance mechanism to allow service users and other stakeholders to register complaints, queries or comments that are addressed promptly by Tbiliservice Group Ltd;
- plans for stakeholder engagement, which is free of manipulation, interference, coercions, and intimidation and is conducted based on timely, relevant, understandable, and accessible information in a culturally appropriate format.

As a result of this SEP was developed a Stakeholder Engagement Implementation Plan (see [Appendix 1](#)) that shall be implemented by Tbiliservice Group Ltd when implementing and coordinating overall Project activities.

PROJECT BACKGROUND

Tbilisi is the capital and largest City of Georgia, located on the banks of the Kura River, with a population of about 1.1 million people¹.

Didi Lilo landfill is a landfill in Georgia near Tbilisi. It is the largest landfill in the country and receives about 80% of Tbilisi's municipal solid waste. The landfill has been operating since 2007 and covers an area of about 40 hectares.



Map 1. The Didi Lilo Landfill

The landfill area is mainly represented by a flat surface inclined to the southeast. From different sides, the adjacent to the territory are:

- From the Southeast direction - by the highway of local importance, the agricultural lands and a further 350-900 meters downstream of Zemo Samgori main channel;
- From the North and Northwest – by the Slopes and hills of the Tselubani ridge,
- separated from the study area by the so-called "Martkopi irrigation channel" and by the road exploiting this channel;
- From the east side – by the agricultural fields and the former poultry factory area;
- From the Westward – by the low elevation and subsequent agricultural plots.

The total amount of waste disposed of per year at the Didi Lilo landfill is approximately 370,000 tons/year².

Sources: ¹ Tbilisi Population 2023. [Link](#)

² Tbilisi solid waste feasibility study. [Link](#)



Figure 1 – Waste disposed to Didi Lilo landfill, tons/year

The daily volume depends on the season. The highest was recorded in summer (July: 1156 tons/day) and the lowest in winter (January: 824 tons/day).

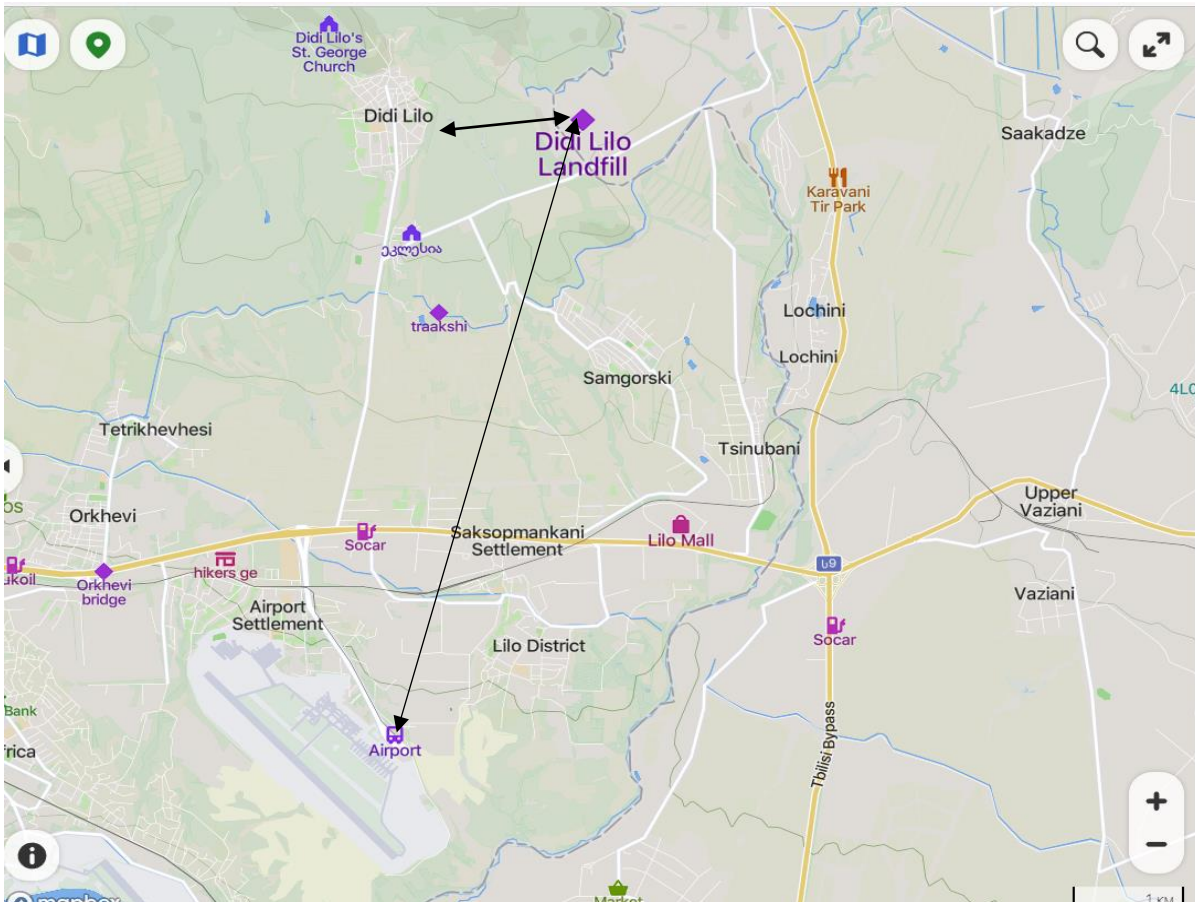
The amount of waste disposed of daily also depends on the days of the week, with the highest being on Monday (1,086 tons/day) and the lowest on Sunday (January: 894 tons/day).

The waste produced by each resident annually is approximately 320 kg/year or 0.9 kg/day.

The landfill is located about 1,4-1,5 km from Samgori village, 1,2-1,3 km from Didi Lilo village and 4.0 km from Norio village, and 7 km from Tbilisi International Airport. Following the sanitary rules and norms, "Hygienic requirements for the arrangement and operation of landfills for solid domestic waste (p. 2.1.7. 005-02) and According to Georgian legislation³, the distance between the boundaries of the landfill and the nearest settlements shall exceed 500

Source: ³ ⁶ Resolution of the Government of Georgia on Approval of technical regulation on the construction, operation, closure and after-care of landfills № 421, August 11, 2015. [Link](#)

m. It is important that the polygon is separated from the nearest settlements by natural barriers, which significantly reduces the risks of possible negative impacts.



Map 2. Landfill Location near Tbilisi

Due to the close location of the nearest villages, there is ongoing dissatisfaction among the local community about the landfill operation. On 15-16 October 2023, the local community, in the face of people, organised a protest demanding the closure of the Lilo landfill. According to local media⁴, the protestors blocked the road leading to the landfill. As the organisers say, if the landfill problem is not solved in the near future, they will hold a protest in front of the Tbilisi City Hall. Residents of the settlements near the dump say that the waste decomposes over time and emits toxins harmful to life, and the population's health is not monitored.

After the protest was over, the Company considered providing more information about the landfill operation, namely, disclosing that the air quality meets the standards/norms and even thinking about inviting citizens to test air quality together.

Considering the community concerns, the Company plans to strengthen interaction with the community and increase transparency through public relations campaigns, press releases and common events targeted at the community. It is recommended to incorporate public consultations, common events, communication via NGOs and Associations, and delivering relevant documentation to the local community. Details on the engagement activities with the community are provided in Chapter 5 Stakeholder Engagement and in recommended stakeholder engagement activities (Appendix 9).

Source: ⁴ Interpressnews. "Close the Lilo landfill" is ongoing. Interpressnews article. [Link](#)

Implementing the Project will improve the waste management of the City of Tbilisi. The anticipated outcome of the Project is to enhance Tbilisi's capability to sort and process dry recyclables, including metals, glass, plastic packaging, paper, and cardboard, which will be separately collected. These recyclables will be prepared for sale as secondary raw materials to interested companies. Furthermore, if found viable, the implementation of the mechanical-biological treatment plant is intended to curtail the volume of waste destined for the landfill, which can help fix the local community's issue with the landfill.

STAKEHOLDER ENGAGEMENT REQUIREMENTS

1.3. Overview

This SEP has been developed to comply with the legal and national policy requirements and meet the EBRD's information disclosure, consultation, and stakeholder participation requirements.

1.4. National regulations

SEP is based on the requirements of national legislation:

- [Constitution of Georgia dated 24/08/1995, № 786. Link](#)
- [Law of Georgia on Environmental Assessment Code dated 01/06/2017, No 890-III. Link](#)
- [Law of Georgia on Environmental Protection dated 10/12/1996, № 519. Link](#)
- [Law of Georgia on the Protection of Ambient Air dated 22/06/1999, №2116. Link](#)
- [Law of Georgia on Personal Data Protection dated 28/12/2011, № 5669-რს. Link](#)
- [Law of Georgia on Waste Management Code dated 26/12/2014, № 2994-ES. Link](#)
- [Organic Law of Georgia – Labour Code of Georgia dated 17/12/2010, № 4113-რს. Link](#)
- [Law of Georgia on Freedom of Speech and Expression dated 24/06/2004, № 220. Link](#)
- [Law of Georgia on Gender Equality dated 26/03/2010, № 2844. Link](#)
- [Law of Georgia on the Elimination of All Forms of Discrimination dated 02/05/2014, № 2391-III. Link](#)
- [Law of Georgia on Health Care dated 10/12/1997, № 1139. Link](#)
- [Resolution of the Government of Georgia "On Approval of technical regulation on the construction, operation, closure, and after-care of landfills" dated 11/08/2015, № 421. Link](#)
- [Organic Law of Georgia Local Self-Government Code dated 05/02/2014, № 1958-III. Link](#)
- [Law of Georgia on Local Fees dated 29/05/1998, № 1401. Link](#)
- [Law of Georgia General Administrative Code of Georgia dated 25/06/1999, № 2181. Link](#)

1.5. EBRD requirements

The Project seeks finance from the EBRD and is therefore structured to comply with the EBRD's 2019 Environmental and Social Policy (ESP) and EBRD Performance Requirements (PRs), including PR 10: Information Disclosure and Stakeholder Engagement.

The EBRD's ESP defines stakeholder engagement as an ongoing process which involves:

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

The EBRD requires that stakeholder engagement:

- Provides 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;
- Involves 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;
- Be based on clearly defined roles, responsibilities, and authority;
- Designates company personnel to implement and monitor consultation and disclosure activities.

In addition to the set of Performance Requirements, EBRD has guidelines for implementing their performance requirements. For the PR10: Information Disclosure and Stakeholder Engagement, EBRD provides a Good Practice Document: [Meaningful Stakeholder Engagement](#), developed by the Multilateral Financing Institutions' Working Group on E&S Standards, primarily for practitioners tasked with organising consultations and stakeholder engagement. Whilst not specific to PR 10, the document summarises critical objectives, principles, and elements of stakeholder engagement.

IDENTIFICATION OF STAKEHOLDERS AND COMMUNICATION METHODS

1.6. Identification of stakeholders

Stakeholder identification is an analysis of all existing individuals and organisations that interact with the Company throughout its life cycle, considering its geographical location and the impact of activities on the regional socio-economic situation.

Tbiliservice Group Ltd does not have internal documents to register the identified stakeholders list. Stakeholders are identified during each international Project the Company is implementing. It is recommended to develop an internal procedure for stakeholder engagement, which would define the list of the Company's stakeholders.

For the purpose of this SEP, stakeholders are defined within the following groups:

- **External stakeholders**, including: Customers (Tbilisi residents, Private sector), Local communities, Vulnerable groups (women, children, elderly people, disabled), Local authorities and government bodies, Investors and international financial institutions (IFIs), Suppliers, contractors, NGOs and Associations, Academic institutions, Media
- **Internal stakeholders**, including: Employees, Trade unions

These stakeholder groups have been identified, including an analysis of the best ways to engage with them according to the types of media that they are likely to use and feel most comfortable with. Stakeholders with diverse perspectives can contribute to a new understanding of local circumstances and/or impacts, risks, and benefits, leading to the

identification of further opportunities for action. Over time, the list of stakeholders and/or methods of communication will need to be adapted to changing circumstances, so it is recommended that Tbiliservice Group Ltd undertake periodic reviews of their stakeholders and maintain an updated stakeholder database.

A two-dimension approach was used to identify an appropriate stakeholder engagement strategy for each stakeholder group:

- **Level of Interest** – defines how much a stakeholder is interested in the outcomes and whether they could be beneficiaries or cause adverse effects.
- **Level of Influence** – defines the degree to which a stakeholder can make or break the Project, for example, through funding, legislation, protests, etc.

Stakeholders with **high influence** and **high interest** are the most interested parties who make the decisions and significantly impact the Project's success. Maximum efforts should be taken to satisfy them.

Stakeholders with **high influence** and **low interest** are those who have little interest but possess significant power to influence Project success. They need to be kept satisfied to prevent negative effects on the Project.

Stakeholders with **low influence** and **high interest** have a strong interest but lack the power to significantly impact the Project. They should be appropriately informed to prevent serious issues, although these people can often be beneficial.

Stakeholders with **low influence** and **low interest** have minimal interest and limited power to influence. They should be monitored and informed as needed.

Stakeholder engagement is directly proportional to the influence of the activity, and as the level of influence on the stakeholder group increases, or as the level of influence of a particular stakeholder on the Project increases, interaction with this particular group should increase and deepen in terms of frequency and intensity of engagement. Accordingly, the priority of each stakeholder or stakeholder group should be managed relatively. The stakeholder mapping below is used to prioritise stakeholders during the Project or operational activities.

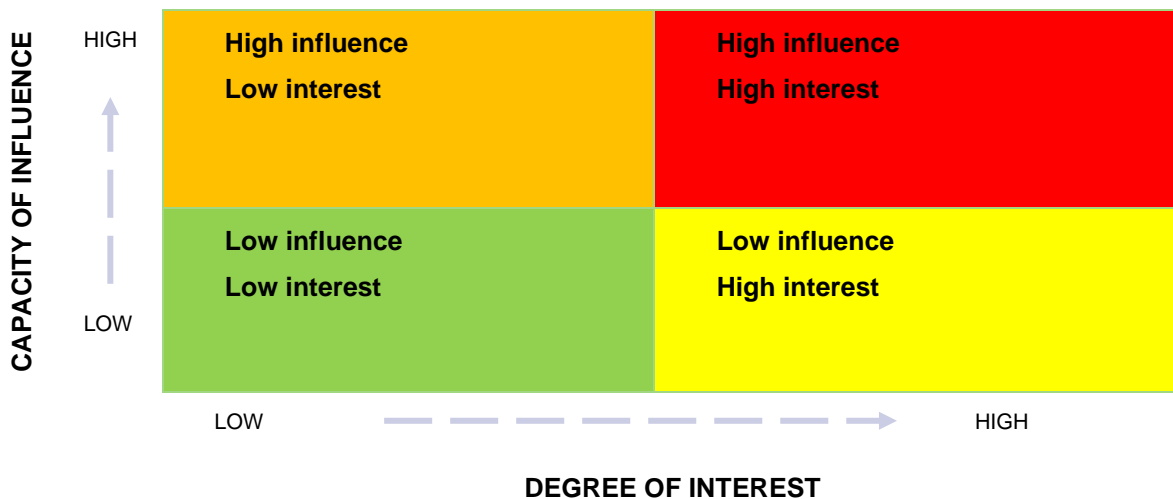


Figure 2. Stakeholder mapping

A stakeholder mapping exercise was carried out according to the identified stakeholder groups and their impacts. The mapping presents the stakeholder identification and analysis and prioritises them for future engagement (see [Appendix 2](#)).

1.7. Communication methods

Table 1. Identification of stakeholders and communication methods

Stakeholders	Communication methods
External stakeholders	
Customers (Tbilisi residents, Private sector)	<p>Implemented communication methods: Tbilservice Group Ltd website, social media, grievance mechanism, Hotline, press releases, Tbilisi City Hall official channels, Awareness raising public Campaign.</p> <p>Recommended: public consultations.</p>
Local communities	<p>Implemented communication methods: Tbilservice Group Ltd website, social media, grievance mechanism, Hotline, press releases, Tbilisi City Hall official channels.</p> <p>Recommended: public consultations, common events, communication via NGOs and Associations, delivering relevant documentation to local community.</p>
Vulnerable groups (women, children, elderly people, disabled)	<p>Implemented communication methods: Tbilservice Group Ltd website, social media, grievance mechanism, Hotline, press releases, Tbilisi City Hall official channels.</p> <p>Recommended: public consultations, communication via NGOs and Associations.</p>
Local authorities and government bodies	<p>Implemented communication methods: individual meetings, information campaign materials, official letters, Tbilservice Group Ltd website.</p> <p>Recommended: consultations with relevant government authorities concerning the Project activities.</p>
Investors and international financial institutions (IFIs)	<p>Implemented communication methods: contractual obligations, official letters, individual meetings, Tbilservice Group Ltd website, Tbilisi City Hall official channels.</p> <p>Recommended: none</p>
Suppliers, contractors	<p>Implemented communication methods: contractual obligations, code of conduct, individual meetings, email, phone.</p> <p>Recommended: none</p>
NGOs and Associations (Greenpole ⁵ , CENN ⁶ , Center for Development and Democracy ⁷ , Sustainable Caucasus ⁸ ,	<p>Implemented communication methods: common events, Tbilservice Group Ltd website, Tbilisi City Hall official channels.</p> <p>Recommended: individual meetings, public consultations.</p>

Notes:

⁵ Greenpole. [Link](#)

⁶ CENN. [Link](#)

⁷ Center for Development and Democracy. [Link](#)

⁸ Sustainable Caucasus. [Link](#)

Association Green Alternative ⁹ , Georgian Greens Movement/Friends of the Earth ¹⁰ , Georgian Society of Nature Explorers "Orchis" ¹¹ , Women's Information Center (WIC) ¹² , Partnership for Human Rights ¹³ , Human Rights Center ¹⁴ , Open Society Georgia Foundation ¹⁵)	
Academic institutions	Implemented communication methods: none Recommended: Tbilservice Group Ltd website, public consultations.
Media	Implemented communication methods: press releases, briefings. Recommended: social media, public consultations.
Internal stakeholders	
Employees	Implemented communication methods: information in contract, code of conduct, staff meetings, company announcements, phone, email, text messages. Recommended: grievance procedure with anonymity option.
Trade unions	Implemented communication methods: none Recommended: union meetings and notifications, grievance procedure.

1.8. Vulnerable groups

Vulnerable groups should be identified as separate groups. Some individuals or groups may face an increased risk of vulnerability or marginalisation, e.g. due to social stigma. Stakeholders, such as women, children, and socially marginalised communities, may need additional methods of communication in the context of SEP (e.g. oral exchange of information in a low literacy community). Early identification and removal of potential barriers (such as language, culture, gender and power imbalances, social inequalities in the community, etc.) to the involvement of all stakeholders is a critical process to ensure the effectiveness of the SEP.

Several vulnerable groups were identified, including women, children, elderly people, and people with disabilities. To meet the needs of these groups, it is planned to use specific communication methods. It is recommended that Tbilservice Group Ltd implements public consultations and communication via NGOs and Associations as additional communication methods with vulnerable groups to reach out to these groups more effectively.

Notes:

- ⁹ Association Green Alternative. [Link](#)
¹⁰ Georgian Greens Movement/Friends of the Earth. [Link](#)
¹¹ Georgian Society of Nature Explorers "Orchis". [Link](#)
¹² Women's Information Center (WIC). [Link](#)
¹³ Partnership for Human Rights. [Link](#)
¹⁴ Human Rights Center. [Link](#)
¹⁵ Open Society Georgia Foundation. [Link](#)

STAKEHOLDER ENGAGEMENT

1.9. Information Disclosure

Information disclosure is necessary to ensure ongoing interaction with local communities and other stakeholders to inform them of existing project activities, effectiveness, and implementation.

The information to be disclosed is governed by both Georgian national law and international guidelines and standards, such as EBRD Performance Requirement 10.

All personal data are to be processed under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

A preliminary list of disclosable information will be prepared to identify the most relevant information for disclosure as part of the stakeholder engagement process. A preliminary list of information to be disclosed is presented in Table 2.

Table 2. Preliminary list of information to be disclosed.

Theme	Topic
Service updates	<ul style="list-style-type: none"> Air quality at the landfill; Waste disposal disruptions; Repair works
Project status updates	<ul style="list-style-type: none"> Non-technical details of the Project; Details on planned construction works; Service updates, including changes to fares, service disruptions; Investment data.

Based on this preliminary list, key stakeholders should be engaged through scoping consultations to obtain their feedback on the proposed topics to include in the Project.

1.10. Information disclosure channels

Information disclosure channels for stakeholders are various means that the Company can use to communicate and share relevant information with its stakeholders. Adequate information disclosure is critical for building transparency, trust, and maintaining positive stakeholder relationships.

Table 3 below represents the communication methods and information for disclosure within the projects' activities.

Table 3. Communication methods and information for disclosure within the projects' activity

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
Customers (Tbilisi residents, Private sector)	<ul style="list-style-type: none"> Tbiliservice Group Ltd website; Hotline; Tbilisi City Hall official channels; Social media pages; 	<ul style="list-style-type: none"> Air quality at the landfill Waste disposal disruptions Repair works Non-technical details of the Project; 	Before the Project / during the Project / after the Project

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
	<ul style="list-style-type: none"> Public relations campaigns and press releases; Reporting 	<ul style="list-style-type: none"> Service updates, including changes to fares, service disruptions 	
Local communities	<ul style="list-style-type: none"> Tbilservice Group Ltd website; Hotline; Tbilisi City Hall official channels; Social media pages; Public relations campaigns and press releases; Common events; Communication via NGOs and Associations 	<ul style="list-style-type: none"> Air quality at the landfill Waste disposal disruptions Repair works Non-technical details of the Project; Service updates, including changes to fares, service disruptions 	Before the Project / during the Project / after the Project
Vulnerable groups (women, children, elderly people, disabled)	<ul style="list-style-type: none"> Tbilservice Group Ltd website; Hotline; Tbilisi City Hall official channels; Social media pages; Public relations campaigns and press releases; Communication via NGOs and Associations 	<ul style="list-style-type: none"> Air quality at the landfill Waste disposal disruptions Repair works Non-technical details of the Project; Service updates, including changes to fares, service disruptions Employment opportunities. 	Before the Project / during the Project / after the Project
Local authorities and government bodies	<ul style="list-style-type: none"> Tbilservice Group Ltd website; Tbilisi City Hall official channels; Direct communication; Reporting 	<ul style="list-style-type: none"> Air quality at the landfill Waste disposal disruptions Repair works Project details; Service updates, including changes to fares, service disruptions Details on planned and executed construction works. 	Before the Project / during the Project / after the Project
Investors and international financial institutions (IFIs)	<ul style="list-style-type: none"> Direct communication; Reporting 	<ul style="list-style-type: none"> Project details; Details on planned and executed construction works; Investment data; Stakeholder engagement activities planned and conducted. 	Before the Project / during the Project
Suppliers, contractors	<ul style="list-style-type: none"> Direct communication; Reporting Consultations; Information boards. 	<ul style="list-style-type: none"> Project details; Stakeholder engagement activities planned and conducted and grievance mechanism; 	Before the Project / during the Project

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
		<ul style="list-style-type: none"> • Social issues and working conditions; • Internal rules; • Emergency procedure. 	
NGOs and Associations	<ul style="list-style-type: none"> • Tbiliservice Group Ltd website; • Tbilisi City Hall official channels; • Social media pages; • Direct communication; • Public relations campaigns and press releases; • Reporting 	<ul style="list-style-type: none"> • Air quality at the landfill • Waste disposal disruptions • Project details; • Details on planned and executed construction works; • Stakeholder engagement activities planned and conducted. 	Before the Project / during the Project / after the Project
Media	<ul style="list-style-type: none"> • Tbiliservice Group Ltd website; • Tbilisi City Hall official channels; • Social media pages; • Direct communication; • Reporting 	<ul style="list-style-type: none"> • Air quality at the landfill • Waste disposal disruptions • Repair works • Project details; • Service updates, including changes to fares, service disruptions • Details on planned and executed construction works. 	Before the Project / during the Project / after the Project
Employees	<ul style="list-style-type: none"> • Direct communication; • Internal meetings; • Consultations; • Information boards; • Employment contracts and Job description 	<ul style="list-style-type: none"> • Project details; • Details on planned construction works; • Stakeholder engagement activities planned and conducted and grievance mechanism; • Social issues and working conditions. 	Before the Project / during the Project / after the Project

At this stage, it is essential to identify that some stakeholders can or want to use the same media. This behaviour may be driven by personal preference, influenced by factors such as age or gender, determined by financial resources, influenced by the individual's literacy or auditory capabilities, or motivated by other various causes. Therefore, several different methods of disseminating the information should be used to promote transparency and inclusion.

1.11. Stakeholder Engagement activities

The specific consultation and disclosure activities, their sequence, and responsible parties are not yet developed. However, it is recommended for Tbiliservice Group Ltd to plan the following stakeholder engagement activities for the Project to inform the citizens about the project plan, its goals, and approximate terms, and details for each stage: starting activities, current progress, and the final results as the Project proceeds:

- hold a briefing for Tbilisi media representatives before the Project starts;
- conduct public hearings with the key stakeholders;

- posting on the official Tbiliservice Group Ltd website³ and on the Facebook⁴ page the key information about the Project;

Tbiliservice Group Ltd has been recommended to use a sample format provided in this SEP for documenting engagement activities (see [Appendix 3](#)).

1.12. Previous and current stakeholder engagement activities

Tbiliservice Group Ltd has communication channels through which it publishes up-to-date information and actively informs the public about the implementation of projects through official channels. These channels include:

- Website¹⁶
- Facebook-page¹⁷

Communication with the public is mainly handled through Tbilisi City Hall channels. The City Hall communicates the non-technical aspects of the projects and is the primary source of information on Tbiliservice Group's operation for the public disclosure.



Figure 3 – News about Tbiliservice Group on Tbilisi City Hall news page¹⁸

Tbilisi City Hall representatives hold regular conferences/presentations to share information on big news and projects inside the City.

Notes: ¹⁶ Tbiliservice Group Ltd website. [Link](#)

¹⁷Tbiliservice Group Ltd Facebook-page. [Link](#)

¹⁸ Tbilisi City Hall news page. [Link](#)

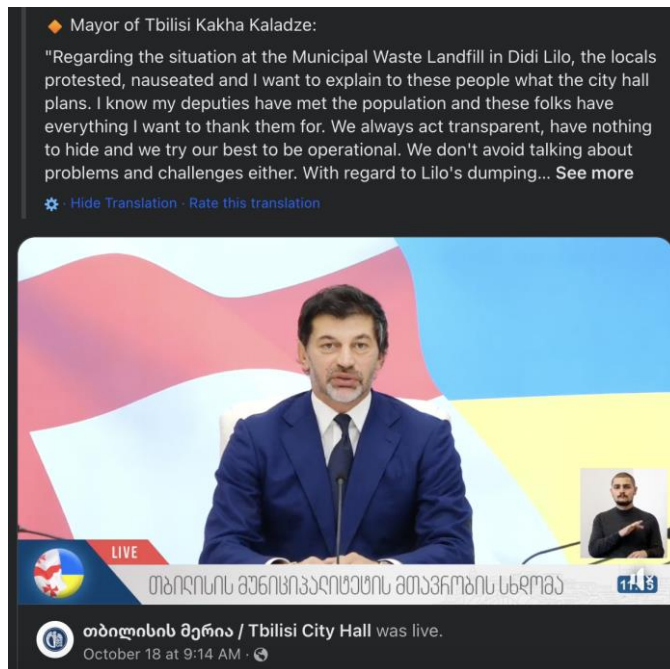


Figure 4 – Meeting of Tbilisi Municipality Government regarding the protests at the Municipal Waste Landfill in Didi Lilo¹⁹

Also, news is published on the Company's website on the news page²⁰. The Facebook platform is actively used to provide community feedback in case of any issues.

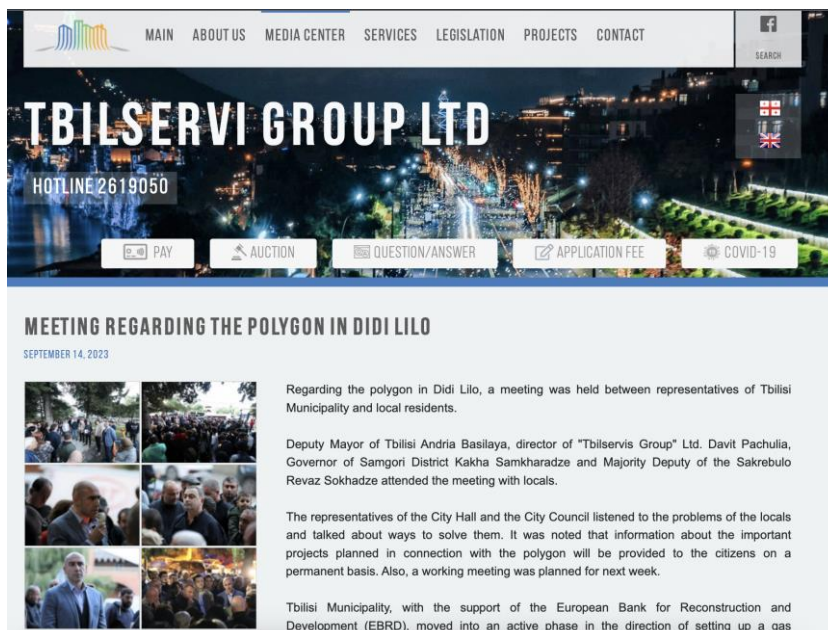


Figure 5 – News about a public meeting with residents²¹ on the Tbilservice Group news page

Sources: ¹⁹ . Mayor of Tbilisi statements on protests at the Municipal Waste Landfill in Didi Lilo. Facebook post. [Link](#)
²⁰ Tbilservice Group news page. [Link](#)
²¹ News about a public meeting with residents. [Link](#)

The Company is open to communication and always shares the project documents at the request of NGOs and other interested parties.

The Company is also partnering with environmental NGOs at different events to support their events or to organise common public events such as public cleanings of city areas, parks, mountains etc.

The Company uses the state electronic document flow of LEPL Municipal Services Development Agency (MSDA) to communicate with local authorities and government bodies.

PUBLIC GRIEVANCE MECHANISM

1.13. Public grievance mechanism at Tbilservice Group Ltd

The grievance mechanism is a formalised means of communication created by the Company to enable stakeholders to raise concerns about the impact of the Company's activities on them in the past, present, or future. The mechanism helps to identify problems at an early stage, before their occurrence and escalation and includes the stage of forming corrective actions, which include resolving the problem identified in the grievance and planning actions to prevent similar cases in the future.

The public grievance mechanism at Tbilservice Group Ltd works as follows.

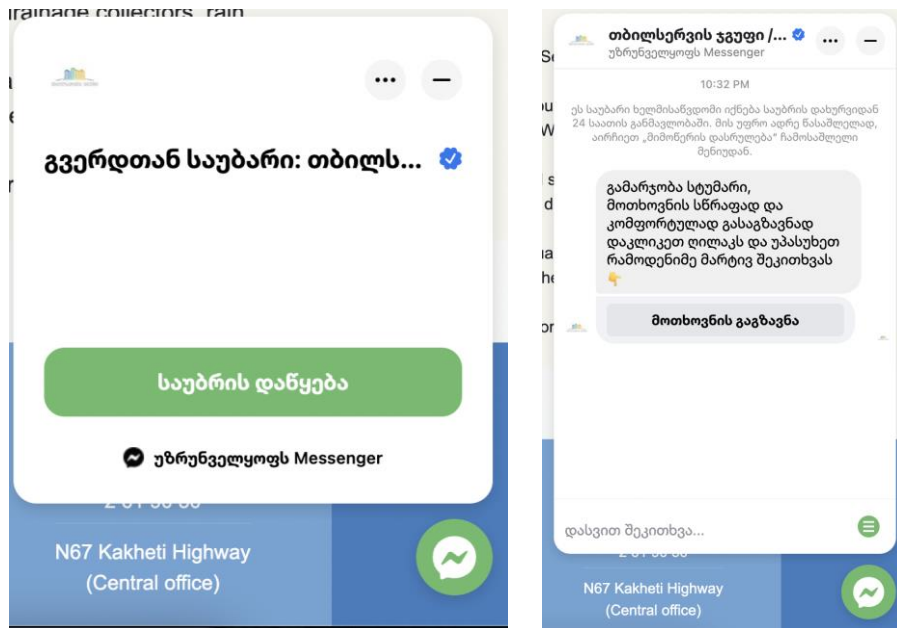
1. Grievances and suggestions from consumers to Tbilservice Group Ltd are accepted in the following ways:

- Website chatbot²²;
- Email: info@tbsg.ge;
- Social media (Tbilservice Group Ltd Facebook page²³);
- Tbilservice Group Ltd Hotline: 2619050;
- Tbilisi City Hall Hotline: 2722222;
- Tbilisi City Hall email: info@tbilisi.gov.ge;
- Mobile application "Fix Tbilisi"²⁴

Notes: ²² Website chatbot on Tbilservice Group Ltd website. [Link](#)

²³ Tbilservice Group Ltd Facebook page. [Link](#)

²⁴ Mobile application "Fix Tbilisi". [Link](#)



Hello! How can we help you?

To send a request quickly and comfortably, click the button and answer a few simple questions

Send request

Figure 6. Website chatbot for questions, grievances, and suggestions on Tbilservice Group Ltd website

2. The Hotline department is responsible for receiving, recording, and processing grievances from the emails and the Hotline. Public relations department is responsible for receiving and processing grievances from Tbilservice Group Ltd social media channels.

The hotline department uses the "Service Desk Plus" system to manage grievances. This application is developed for all technical teams (street lighting, sewage management, waste management, mechanical department). When the grievance is submitted, it is automatically categorised and assigned to a responsible department with a notification for fixing the issue. The internal department is in charge of solving the reappearance of the problem if it is not solved.

"Service Desk Plus" also facilitates the receipt of statements to the software and transfers them to the electronic doc-flow system of LEPL Municipal Services Development Agency (MSDA). All grievances filed to the MSDA are officially registered and shared with the Company.

3. Executives process the grievance and respond to the consumer.

After receiving the grievance, the Company immediately reacts and fixes the issue. The Company does not have an internal procedure that regulates the grievance mechanism process, review and reply period grievances, and responsible party. It is recommended to develop such an internal procedure.

The grievance management process is conducted confidentially to prevent and address threats of or actual retaliation against complainants and those associated with complaints or concerns. Information about the complainant, the nature of the complaint, and the content of the responses to the complaint are not disclosed to the public.

For data protection measures and personal data security during collecting grievances, the Company has a database and an archive and following the Law of Georgia on Personal Data Protection²⁵, data is kept only for the period necessary to achieve the purpose of data processing. After this period, the information is deleted.

The grievance mechanism process is illustrated in [Appendix 4](#).

1.14. Proposed grievance mechanism with anonymity option (including GBVH cases)

Grievance boxes

To provide the anonymity option to the grievance mechanism, it is recommended to inform stakeholders on the existing grievance box at the entrance to the Company and that it is possible to make an anonymous grievance. A freely available grievance form should be placed next to the box.

The grievances could be shaped in the form of complaints and grievances as per [Appendix 5](#). The proposed form includes two options to submit a complaint: with the identification of a personality and without (anonymous).

Then, creating a grievance register log is necessary to indicate and monitor the number, implementation, responsibilities, and deadlines of every appeal. Samples of the grievance record sheets are presented in [Appendix 6](#).

The grievance box should be checked weekly, and all grievances should be recorded in a Grievance log. The place with the installed grievance box shall be safe, well-lit, and free from video surveillance or 24-hour security guarding.

Stakeholders covered by the proposed grievance mechanism are:

- internal stakeholders such as employees and managers of the Tbilservice Group Ltd;
- community;
- other parties such as suppliers, contractors, distributors, or customers.

Anonymous option in existing Hotline

Another option that could include the anonymity option could be extending the Hotline's responsibility to accept and process anonymous grievances. To implement this, all Hotline operators should undergo training on communicating with the complainant using a gender and inclusion lens. Changes should also be made to a registration system that could provide the possibility to form, register, collect and monitor complaints with a limited amount of required information and no personal data.

Separate email address for anonymous appeals

To separate GBVH cases, it is recommended to introduce a separate email address for anonymous appeals. The email address will be promoted through various communication channels, including the interests of all stakeholder groups (via the Internet and media resources, announcements around the City, at the Tbilservice Group Ltd buildings and halls, etc.).

Confidentiality and avoiding retaliation

To address concerns related to potential retaliation within the proposed grievance mechanism, it is recommended to implement comprehensive measures aimed at safeguarding individuals who choose to submit grievances, especially in GBVH cases. A core element is to explicitly

Source: ²⁵ Law of Georgia on Personal Data Protection. [Link](#)

communicate that retaliation will not be tolerated under any circumstances. This commitment should be highlighted prominently in all communication materials associated with the grievance mechanism, including the grievance form, information about the grievance box, and the hotline. Furthermore, a clear statement should be incorporated into the communication channels promoting the separate email address for anonymous appeals. Any allegations of retaliation should be thoroughly investigated.

1.15. Enhancing approach to work with grievances

Tbiliservice Group Ltd has an established grievance mechanism that works for the Company. It has a variety of ways to submit grievances and suggestions of the responsibility for receiving and handling grievances.

We propose to integrate the following grievance mechanism structure to enhance the grievance mechanism and incorporate the option of anonymous appeal, namely, to include the possibility of submitting grievances related to GBVH issues.



Figure 7. Grievance mechanism structure

Receive and register in the grievance log: Grievances may be submitted on a named or anonymous basis. The various options for making a grievance are clearly defined in a sample of the Grievance and Complaints Form ([Appendix 5](#)), which is widely communicated and easily accessible to all community members.

All grievances (irrespective of their validity) should be recorded. This record must be updated regularly to reflect the updated status of the grievance (under investigation, closed, open). A grievance log form is suggested for recording grievances ([Appendix 6](#)).

Acknowledge: The grievance manager must acknowledge receipt of a grievance within a specified period of time. For grievances received in person, an acknowledgement can be made on the spot or via email, message, or letter.

Assess and analyse: The responsible person for grievances should conduct a timely initial assessment of the complaint to determine whether:

- it is linked to the project/organisation's ongoing activities;
- it is within the responsibility of the grievance mechanism;

- belonging to a group of stakeholders of the complainant.

Once the validity has been established, the responsible person should consider whether the issue can be resolved without the involvement of others in the organisation. If not, it should be referred to the appropriate department with a timeline for resolution.

Investigate and resolve: An officer of the relevant department or an investigation team (coordinated by the Grievances Manager) should be appointed. The officer or team should be tasked with investigating the cause of the grievance and making any necessary changes to internal systems to prevent the recurrence of a similar grievance. An Investigation Report (see [Appendix 7](#)) should be completed within a month. Where there is an opportunity to resolve a matter more quickly, that effort will be made. It shall be noted that not all complaints will require the form of an investigation team and investigation. Efforts to avoid an investigation should be considered first.

At any time of investigation, especially for grievances that include GBVH issues, consideration should be given to involving third-party organisations specialised in GBVH, vulnerable groups and social protection projects for the community (NGOs, social organisations, etc.) in the investigation team or further investigation process. Third parties can help increase community trust and overcome certain limitations of project-level mechanisms, such as lack of transparency, insufficient corporate resources, possible conflict of interest and bias, if they are perceived as unbiased and impartial towards both the organisation and the communities.

Following the investigation, the next step is for the relevant department or investigation team to propose a resolution to the complainant. If the complainant accepts the solution, no further action is required. If the resolution is not accepted, the grievance should be escalated to senior management and then to a Grievances Committee for further investigation and resolution.

Implement resolution: If the resolution includes specific corrective actions, the responsible organisation should implement those per the agreed timeframe.

Monitor and close: Each grievance and action taken to resolve should be monitored for a reasonable period to ensure no residual problems and risks to the Project, organisation or community.

Feedback: A feedback mechanism shall be established according to the following options:

- Contact with the complainant according to the relevant preferred communication channel (specified in the Complaint Form);
- In-person, if this way of communication is appropriate for the case or if the person (complainant) made a grievance in such a way and communicated this way of communication as suitable.

Each of these feedback forms shall be applied on a case-by-case basis, considering the gender and inclusion lens, the complainant's willingness to be exposed and the seriousness of the case.

MONITORING, EVALUATION, AND REPORTING

Tbiliservice Group Ltd plans to monitor, evaluate, and report for the stakeholder engagement process as a part of its annual reporting process to EBRD.

1.16. Monitoring

It is recommended that Tbilservice Group Ltd monitors its level and type of stakeholder engagement during the Project. It can be done by developing a set of indicators to monitor progress on the following points:

- Grievance mechanism: Number of complaints received, type of complaints and how they were resolved;
- Engagement meetings: Number of meetings and presentations conducted, and types of stakeholders engaged;
- Media relations: Number of mass media articles and/or announcements published;
- Web and social media presence: Number of visitors, enquiries, and comments submitted on the websites and social media pages.

1.17. Stakeholder engagement plan reporting

This SEP identifies a number of reporting activities. It is recommended that the SEP and the monitoring indicators referred to above are reviewed by Tbilservice Group Ltd as necessary throughout the Project 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 list of stakeholders remains appropriate, and whether engagement should cease or be extended to any stakeholders.

Additional updates may be required based on changes in Tbilservice Group Ltd.'s services and practices.

1.18. Annual reporting

An annual report summarising Tbilservice Group Ltd.'s performance on stakeholder engagement and grievances shall be implemented as per the reporting requirements of EBRD.

1.19. Performance evaluation

The monitoring and evaluation of stakeholder engagement performance should review to what extent the SEP activities have been completed. The results of the evaluation should be documented, and any lessons learned should be incorporated into the relevant SEP updates. A possible SEP monitoring and evaluation framework for further use by Tbilservice Group Ltd is presented in [Appendix 8](#).

APPENDICES

Appendix 1. Stakeholder engagement implementation plan

Action	Content	Timing	Responsibility	Targeted Stakeholder Group
Project information is available on the Tbilservice Group Ltd website and Tbilisi City Hall's official website	<ul style="list-style-type: none"> Project information should be available Tbilservice Group Ltd website and on Tbilisi City Hall's official website. List of Project activities, project timetable, Stakeholder Engagement Plan, should be available on the websites. Grievance mechanism and information disclosure process should be specified and announced beforehand. 	<ul style="list-style-type: none"> Before starting the Project activities During the Project activities and construction (it will be revised to include new information) 	<p>Responsible coordinators from Tbilservice Group Ltd</p> <p>Tbilservice Group Ltd public relations department</p> <p>Tbilservice Group Ltd hotline department</p>	All stakeholders
Public relations campaigns and press releases	<p>Information for dissemination shall contain:</p> <ul style="list-style-type: none"> non-technical information about the Project; the project timetable; 	<ul style="list-style-type: none"> Before starting the Project activities During the Project activities and construction After completion of Project activities 	<p>Responsible coordinators from Tbilservice Group Ltd</p> <p>Tbilservice Group Ltd public relations department</p> <p>Tbilservice Group Ltd hotline department</p>	<p>Customers (Tbilisi residents, Private sector)</p> <p>Local communities</p> <p>Vulnerable groups (women, children,</p>

	<ul style="list-style-type: none"> • available grievance mechanism and communication channels; • any changes in providing services that may take place. 			<p>elderly people, disabled)</p> <p>NGOs and Associations</p> <p>Media</p>
Direct communication	<ul style="list-style-type: none"> • Government bodies, state institutions, local authorities, and IFIs should be directly informed about the Project activities. • NGOs and Associations shall be informed about the possibility of visiting and project details. • Local communities should be informed about the Project activities and non-technical details. 	<ul style="list-style-type: none"> • Before starting the Project activities • During the Project activities and construction • After completion of Project activities 	<p>Responsible coordinators from Tbilservice Group Ltd</p> <p>Tbilservice Group Ltd public relations department</p>	<p>Local authorities and government bodies</p> <p>Investors and international financial institutions (IFIs)</p> <p>NGOs and Associations</p> <p>Local communities</p>
Distribution of the information to vulnerable groups	<ul style="list-style-type: none"> • It is recommended to inform on construction activities the vulnerable individuals living within the Project affected area. • Communication through NGOs and Associations can be more effective 	<ul style="list-style-type: none"> • Before starting the Project activities • During the Project activities and construction • After completion of Project activities 	<p>Responsible coordinators from Tbilservice Group Ltd</p> <p>Tbilservice Group Ltd public relations department</p>	<p>Vulnerable Groups</p>
Conduct public hearings	<ul style="list-style-type: none"> • Public hearings should be conducted before the Project with the following feedback from stakeholders; 	<ul style="list-style-type: none"> • Before starting the construction activities 	<p>Responsible coordinators from Tbilservice Group Ltd</p>	<p>All stakeholders</p>

	<ul style="list-style-type: none"> • available grievance mechanisms and communication channels. 	<ul style="list-style-type: none"> • During the construction activities and construction 	<p>Tbilservice Group Ltd public relations department</p> <p>Tbilservice Group Ltd hotline department</p>	
Social media pages	<ul style="list-style-type: none"> • Project information should be available on Tbilservice Group Ltd website, Tbilservice Group Ltd Facebook page and Tbilisi City Hall's official channels. • Grievance mechanism and information disclosure process should be specified and announced beforehand. 	<ul style="list-style-type: none"> • Before starting the Project activities • During the Project activities and construction (it will be revised to include new information) 	<p>Responsible coordinators from Tbilservice Group Ltd</p> <p>Tbilservice Group Ltd public relations department</p> <p>Tbilservice Group Ltd hotline department</p>	All stakeholders
Reporting	<ul style="list-style-type: none"> • Report on Project activity and stakeholder engagement activity should be prepared and available on the Tbilservice Group Ltd website. 	<ul style="list-style-type: none"> • During the Project activities and construction • After completion of Project activities 	<p>Responsible coordinators from Tbilservice Group Ltd</p> <p>Tbilservice Group Ltd public relations department</p>	<p>Investors and international financial institutions (IFIs)</p> <p>All stakeholders</p>

Appendix 2. Stakeholder mapping analysis

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
External Stakeholders						
Customers (Tbilisi residents, Private sector)	Interested in good quality municipal services, competitive prices, and adequate tariffs. Employment opportunities.	Can be a source of labour for Tbilservice Group Ltd. Can leave positive feedback on products in open sources of information.	Can participate in strikes. Can leave negative feedback on services in open sources of information.	Low	High	
Local communities	A healthy environment in which the norms of air pollution and sound load/noise comply with the regulations. Absence of odour and waste from the landfill in the area of their residence. Employment opportunities. Access to good quality municipal services.	Respective areas can be a source of labour for Tbilservice Group Ltd.	Can complain and organise strikes, forming a negative image of Tbilservice Group Ltd.	High	High	
Vulnerable groups (women, children, elderly people, low-income families, disabled)	A healthy environment where the norms of air pollution and sound load/noise comply with the regulations. Employment opportunities. Access to good quality municipal services.	Vulnerable or disadvantaged people can be a source of labour for Tbilservice Group Ltd.	Can complain and organise strikes, forming a negative image of Tbilservice Group Ltd.	Low	Low	

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
Tbilisi City Hall	<p>Interested in receiving taxes for the budget.</p> <p>Access to good quality municipal services for the community.</p> <p>A healthy environment for developing other economic activities, including tourism.</p> <p>Employment opportunities for the community members.</p>	Can promote the development of Tbilservice Group Ltd.	No	High	High	
Local authorities and government bodies	Legal compliance with environmental, OHS, firefighting, and social requirements.	Grant permits and licenses	<p>May refuse to grant licenses/permits.</p> <p>Can impose penalties as a result of inspections up to the suspension of the enterprise.</p>	High	Low	
Investors and international financial institutions (IFIs)	Interested in profit and good environmental and social performance of Tbilservice Group Ltd.	Investment opportunities	<p>No investment opportunities.</p> <p>High risks in existing investment in case of non-compliance to EBRD PRs.</p>	High	High	
<p>NGOs and Associations:</p> <ul style="list-style-type: none"> • Greenpole; • CENN; • Center for Development and Democracy; • Sustainable Caucasus; • Association Green Alternative; 	<p>Interested in access to good quality municipal services for the community.</p> <p>Interested in city environmental conditions.</p>	Having a positive image in the eyes of the public, NGOs can disseminate positive information about Tbilservice Group Ltd and its services.	Can complain and organise strikes, forming a negative image of Tbilservice Group Ltd.	Low	High	

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
<ul style="list-style-type: none"> Georgian Greens Movement/Friends of the Earth; Georgian Society of Nature Explorers "Orchis"; Women's Information Center (WIC); Partnership for Human Rights; Human Rights Center; Open Society Georgia Foundation. 	Employment opportunities for disadvantaged community members					
Media, including local media: <ul style="list-style-type: none"> News agency "Interpressnews"²⁶ News channel "Palitrnews"²⁷ 	Interested in the topic and information materials for the news.	Printed information can positively affect the image of Tbilservice Group Ltd.	Printed information can negatively affect the image of Tbilservice Group Ltd.	Low	Low	
Suppliers: material suppliers, utility suppliers (e.g., electricity)	Interested in cooperation and prompt payments.	Contribute to the successful operation of Tbilservice Group Ltd., while supplying materials and	May refuse to supply materials and delay deliveries, causing interruptions in the Tbilservice Group Ltd operations. May supply poor-quality products and violate environmental and	Low	Low	

Notes: ²⁶ News agency "Interpressnews". [Link](#)

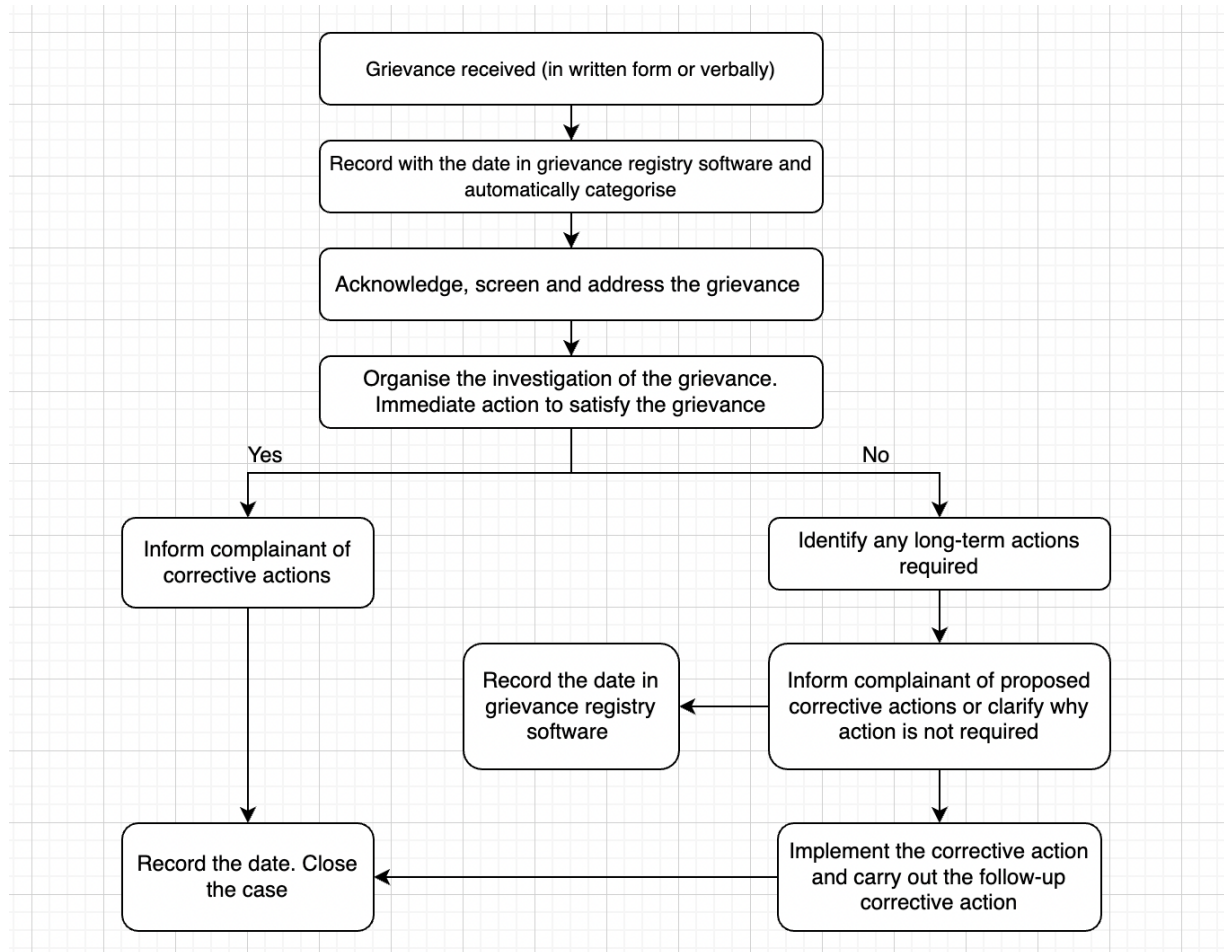
²⁷ News channel "Palitrnews". [Link](#)

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
		complying with obligations. Provide quality services in full scope.	occupational safety requirements, thereby affecting Tbilservice Group Ltd image. May stop providing services, provide services of inadequate quality or volume.			
Subcontractors	Employment opportunities, prompt payments, and safe working conditions.	Contribute to developing and improving Tbilservice Group Ltd services if the contractors perform well and are proactive.	They can violate the terms of contracts and be irresponsible in performing their responsibilities.	Low	High	
Internal Stakeholders						
Employees	Employment opportunities, salary and benefits, safe working conditions.	Contribute to developing and improving Tbilservice Group Ltd services if employees perform well and are proactive.	Can organise strikes and be irresponsible in performing their working responsibilities.	Low	High	

Appendix 3. Sample format for documenting engagement activities

Stakeholder groups	Date/location	Purpose of engagement	Method of engagement	Key outcomes and actions	Status of actions identified in previous consultations	List of participants

Appendix 4. Grievance mechanism process



Appendix 5. Grievance and Complaints Form

Reference No:	Responsible person to complete
Full Name/Anonymously	
Contact Information and Preferred method of communication	By Post: Please provide a mailing address: _____
Please mark how you wish to be contacted (mail, telephone, email).	By Telephone: _____
	By email: _____
Description of Grievance:	
What would you like to see happen to resolve the problem?	
Date	

Appendix 6. Grievance Register Form

No	Name/ Anonymously	Date of complaint receipt	How complaint was received	Who received the complaint	Description of the issues/complaints	Contact details of affected person	Notes, undertaken actions	Entities involved	Status of the issue

Appendix 7. Grievance Investigation Report Template

Summary Report of Investigation for Grievances (including Gender-Based Violence and Harassment cases)

Introduction	Investigation authorised by: [Name and role]
	Investigator: [Name and role]
	Date investigation began:
	Background to the investigation: [Brief overview of the matter]
Process of investigation	The investigation process: [Explain how the investigation was authorised]
	Evidence collected: [List all evidence collected]
	Evidence not collected: [List all evidence that could not be collected and why]
	Persons interviewed: [List all people interviewed]
	Persons not interviewed: [List any witnesses that could not be interviewed and why]
	Anonymised statements: [If any, explain why and provide details of any enquiries into witness]

The investigation findings	Summary of written and physical evidence: [name and summarise each document contained, set out how the evidence supported or did not support your findings and why]
	Summary of witness evidence: [name and summarise each witness statement, quote from statement where relevant, set out how the witness statement supported or did not support your findings and why]
	Facts established: [detail what the investigation has established]
	Facts that could not be established: [detail any part of the investigation that was inconclusive]
	Mitigating factors: [detail if there were any mitigating factors uncovered that are relevant to the investigation]
	Other relevant information: [detail any other information that is relevant to the matter]
Conclusion [if required]	Recommendation: Formal action/Informal action/No action required
	Further details on recommendation: [such as the type of action suggested for example, formal disciplinary meeting, and if there are any other recommendations related to the matter. In disciplinary matters, the investigator should not recommend a possible sanction. This should only be considered at a disciplinary hearing]
	Investigator's signature: Date:
Supporting documents	[List all documents collected as part of investigation and included in report]

Appendix 8. SEP Monitoring and Evaluation Framework

Monitoring Focus	Monitoring Indicator	Project Stage	Monitoring Frequency	Parties Responsible for the Monitoring
Effectiveness of SEP activities	<ul style="list-style-type: none"> Concerns of people affected by the Project, observations from the consultations or the feedback received; Feedback and opinions of the city citizens and community affected by the Project; Response of stakeholders to the public consultation process, comments made, and the feedback received. 	Construction and Operation	Monthly	Responsible person for dealing with citizens' appeals; responsible person for access to public information; responsible person for internal policy, press and information
			Once every 6 months	An Independent Community Expert / Consulting company
Information disclosure and grievance mechanism	<ul style="list-style-type: none"> Public consultation process identified - record of the activities, number of meetings held, number of participants who attended the public consultation meetings, visits to local authorities or other local stakeholders; Types of grievance mechanisms - number and results of the problems responded or closed. 	Construction and Operation	Weekly and Monthly	Responsible person for dealing with citizens' appeals; responsible person for access to public information; responsible person for internal policy, press and information
			Once every 6 months	An Independent Community Expert / Consulting company

Appendix 9. Recommended stakeholder engagement activities

Gaps in existing stakeholder activities	Recommended stakeholder activities	Project stage
Identification of stakeholders and communication methods		
No internal document which would register the list of identified stakeholders.	To develop an internal document for stakeholder engagement, which would define the list of Company's stakeholders.	Before
Lack of diversification of stakeholders' communication methods	<ul style="list-style-type: none"> • Include public consultations as a communication method with customers, vulnerable groups, NGOs and associations, academic institutions, and media representatives. • Communicate through NGOs and Associations to improve engagement with local communities and vulnerable groups. • Consider applying anonymity to the grievance process to increase uptake, particularly among employees. • Involve trade unions through meetings and notifications. 	Before / During / After
No identification and development of communication methods applied to vulnerable groups	To implement public consultations and communication via NGOs and Associations as additional communication methods with vulnerable groups to reach out to these groups more effectively.	Before / During / After
No updated stakeholder database	To undertake periodic reviews of stakeholders and maintain an updated stakeholder database.	Before / During / After
Information disclosure and stakeholder engagement activities		
Public consultations are not incorporated as a stakeholder engagement method	To engage key stakeholders through scoping consultations to obtain their feedback on the proposed topics to include in the Project.	Before / During / After
The specific consultation and disclosure activities, their sequence, and responsible parties are not yet developed	To develop the plan of consultation and disclosure activities, their sequence, and responsible parties before the Project starts	Before

Gaps in existing stakeholder activities	Recommended stakeholder activities	Project stage
Lack of engagement with NGOs and associations representing the interests of vulnerable groups	Involve representatives of NGOs and associations that represent the interests of vulnerable groups in public hearings during the implementation of projects to consider their needs.	During
Public grievance mechanism		
Absence of a grievance box	To provide the availability of a grievance box at the entrance	Before
Anonymity is not available in the grievance mechanism	To incorporate a grievance mechanism with an anonymity option (including GBVH cases).	During
Absence of an internal procedure for grievance mechanism	Develop internal procedure for grievance mechanism specifying the step-by-step process of handling grievances (including timeframes for each stage)	Before
Information on grievance mechanism availability is not communicated with stakeholders	Provide access to the external procedure for grievance mechanism for the Project with a clear procedure of grievance management, including communication means, responsible persons for grievance recording and resolving, timeframe and methods of providing responses to the complainant. Share the grievance mechanism with the community and other stakeholders using all the identified communication methods. Specify that reporting a grievance is free and does not require a payment.	Before
Monitoring, evaluation, and reporting of the stakeholder engagement process		
No defined process for monitoring stakeholder engagement	It is recommended to monitor the level and types of stakeholder engagement during the Project.	During
Not identified the evaluation and SEP reporting process	The SEP and the monitoring indicators are recommended to be reviewed throughout the course of this Project as deemed necessary to assess whether:	During

Gaps in existing stakeholder activities	Recommended stakeholder activities	Project stage
	<ul style="list-style-type: none"> • the type of consultation and disclosure activities are appropriate for the different stakeholders; • the frequency of consultation activities is sufficient; • grievances are dealt with appropriately; • whether the list of stakeholders continues to be appropriate and whether engagement with any stakeholders should be discontinued or extended. 	
Not identified the performance evaluation process	The monitoring and evaluation of stakeholder engagement performance should review to what extent the SEP activities have been completed. The results of the evaluation should be documented, and any lessons learned should be incorporated into the relevant SEP updates.	After