

Saran Green SOLAR POWER PLANT

STAKEHOLDER ENGAGEMENT PLAN



Revision 0

August 2018

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ABBREVIATIONS

CLO	Community Liaison Officer
CSRP	Corporate Social Responsibility Program
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
LLP	Limited Liability Partnership
LRP	Livelihood Restoration Plan
NGO	Non-Governmental Organization
OVOS	Environmental Impact Assessment based on Russian standards
PR	Performance Requirement of the EBRD Environmental and Social Policy 2008
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant

1 INTRODUCTION

This Stakeholder Engagement Plan (SEP) describes SES Saran LLP’s (the Company) approach to interacting with stakeholders, including the general public, and the disclosure of relevant information with respect to Company’s current operations and the 100MWac solar photovoltaic power plant Saran (SPP) construction plans (the Project).

The SEP includes a strategy to provide timely, meaningful and appropriate information to stakeholders and ensure the opportunity for such stakeholders to express their views and comments. The SEP provides a mechanism for the consideration and response to comments and potential grievances raised by stakeholders. Engagement with stakeholders is an ongoing process, which applies to the entire period of the project implementation and operation.

The Project aims to provide sustainable and environmental and socially friendly source of renewable electrical energy for the region to reduce energy deficit and allow further economic development and creation of new jobs. Few jobs will be created for the local unskilled labour, but presence of the SPP may lead to knowledge transfer and encouragement of the targeted education among the local school graduates. Indirect benefits are expected to be minimal or none.

2 LEGAL FRAMEWORK

The activities specified in this plan conform to Kazakhstan legislation including ratified by Kazakhstan international conventions and the EBRD Performance Requirement 10 for information disclosure and stakeholder engagement. The project will be designed to meet best international practice. Table 1 summarizes the Kazakhstan and EBRD requirements.

Table 1 Stakeholder consultation requirements summary

EBRD PR10 requirements	Kazakhstan Requirements
Identify people or communities that are or could be affected by the project, as well as other interested parties.	Stakeholder identification is not required. Relevant regulatory bodies to be identified
Ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation.	Public notice to be published in two local newspapers in Kazakh and Russian languages 20 days before the meeting that ends the consultation. Local council shall be consulted on the time and place of a public meeting and invited to it.
Maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.	Stakeholders shall be engaged and project information disclosed 20 days before the EIA is submitted to the State Environmental Expertise for approval.
Begin consultations early in the environmental and social appraisal process.	Grievance mechanism shall comply with the Law on Grievances Handling procedures № 221-III 12.01.2007
Throughout the life of the project provide ongoing information to identified stakeholders, commensurate to the nature of the project and its associated environmental and social impacts, and the level of public interest.	
Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of understandable and accessible information, in a culturally appropriate format;	
If required by the EBRD, Stakeholders should be able to provide comments and recommendations on the draft Stakeholder Engagement Plan;	
Disclose a non-technical summary in the Kazakh and Russian languages and in accessible and culturally appropriate manner,	
Tailor stakeholder engagement to the needs of any disadvantaged or vulnerable groups;	
Publish regular reports to external stakeholders on the Company environmental and social performance;	
Establish a grievance mechanism, inform the affected communities and ensure that the mechanism addresses concerns promptly and transparently, in a culturally appropriate manner, and is readily accessible to all stakeholders.	

3 SUMMARY OF THE PROJECT STAKEHOLDERS ENGAGEMENT AND INFORMATION DISCLOSURE TO DATE

The consultation with stakeholders is in full compliance with the RoK requirements and for the public meetings went beyond them as no public meeting is required for the project. Consultation started 23.05.2018 from a public note on the city council web page and in a local newspaper Saran Gazeti. The EIA developer gave its email address for processing public comments. Consultation ended with a public meeting 20.06.2018 arranged in the Saran Youth Centre Hall. The meeting was attended by 140 residents, local NGOs, the Public Governance Council chairman, the city councilor deputy, the city parliament representative, the designer, EIA developer, EPC contractor representative and the project managing company representative conducted the meeting. The project was explained by the Company and impacts by the EIA developer.

The public questions related to local benefits from the project like taxes, employment and social support livestock herding obstruction, existing utilities and infrastructure alteration, health of the nearby residents and the project budget. In an open vote the attendees voted for the project.

Local residents from Finskiy and Ugolnyy estates were asked individually house by house including men and women, elderly, employed in the local industries, unemployed, shop keepers and single women with children.

The questioned were asked whether they knew of the project and if so, what did they know. What ongoing problems they had; what impact and benefits for themselves did they see from the project? The stakeholder engagement and grievance handling mechanisms expected to be established on the project was explained and opinions were asked on its effectiveness. The most appropriate places for the project information disclosure were identified.

The following questions were asked and most common answers given during the interviews:

- | | |
|--|--|
| 1. What ongoing problems do you have? | None |
| 2. Are there any interruptions to electricity? | Once a quarter for half day |
| 3. Name any improvement/deterioration that happened in the past 5 years; | None |
| 4. How long have you been living here? | Since birth or >20 years |
| 5. Where do the new settlers come from? | No new settlers |
| 6. What is the main source of income? | Industrial work locally and in Karaganda |
| 7. Do you have problems with unemployment in the village? | Some but not critical |
| 8. What do you think are the impacts and benefits from the project? | Nose from ramming after that none |
| 9. Do you think the stakeholder engagement mechanism will be able to take your opinion into account? | Good idea we will use it |
| 10. What is the most appropriate place to post information about the project? | Naurys and Ugolyek shops |
| 11. How do you feel about the project? | Some worried about radiation others though as good thing |
| 12. Do you approve of it in general? | Approve. Approve if passage to pastures maintained |

All questioned knew about the project as the construction was in full scale during the assessment. None assigned a particular current or potential value to the allocated for the SPP area but as a route to the pastures further afield.

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS¹

4.1 Stakeholders and Information Needs

Table 2 identifies the stakeholders currently known and indicates how information will be transmitted to them during the preparation and implementation of the Project in Russian and Kazakh languages as is judged to be most appropriate for a specific stakeholder. Information for international NGOs will be disclosed in English.

To ensure continuous and systematic communication with stakeholders of the project, the Company has appointed a Community Liaison Officer (CLO):

Mrs. Yuliya Allakhverdiyeva
Tel.: +77052929251
E-mail: ayulena@gmail.com

The CLO will provide information, collect feedback, as well as provide answers to incoming communications (via email, telephone or in person). The CLO will regularly update this SEP, including Table 2 with particular attention to identification of vulnerable stakeholders.

The Company has placed the information on the project website which acts as the primary source, as well as a summary of all the efforts of engagement with stakeholders.

4.2 Local Authorities and Regulators

The CLO has established communication with the city council. The city councilor is expected to play key role in identifying local needs and project related problems and apprehensions. She shall receive the project related information in paper copy or over email, as appropriate. The CLO will maintain regular telephone contact with the councilor and during construction period conduct several meetings in relation to the development and implementation of the Corporate Social Responsibility Program (CSR). The councilor is expected to be a driving force in organizing the local community if this is required to implement the CSR.

Communication with the regulators will be formal and within the required by the legislation framework. No additional information will be addressed to them directly.

4.3 The Project Workers

The project workers and the contractors will be informed on the employment conditions, on changes to the work requirements and likely duration of their involvement. The grievance handling mechanism will also be explained.

4.4 Suppliers of Goods and Services

The Company will ensure fair selection and allow potential suppliers to have sufficient time for building qualitative and quantitative capacity for the required services. The Company management will conduct meetings with managers of the businesses that may benefit from the project or be negatively affected by them and ensure that the businesses are aware of the services (character and volume) that are planned to be procured locally and the contractor selection process.

¹ The project stakeholders are the individuals or groups who are directly and/or indirectly affected (positively or negatively) by the project and generated by its activities or have interests in the project or the developer or have the potential to influence project outcomes or the developer operations or contribute to the work due to their expert knowledge of and/or experience in the region.

The Company will be responsible for establishing communication with suppliers and will ensure that health, safety, environmental and social requirements are incorporated in the contracts. The suppliers will be informed in advance that their EHS and social performance, work sites and documentation will be monitored via regular audits. The Company will provide early information on changes in demand to enable timely adjustment without jeopardising the contractor business and personnel security. The supplier personnel involved in the project will be included in the information disclosure process and grievance mechanism.

Table 2 Project stakeholders and information disclosure methods

Stakeholder	What to disclose	How and Where	When
Saran city council	NTS, SEP, bulletins, employment plans, CSR discussion results	Telephone, email, formal letters hand delivery if required and meetings at the council office	As soon as possible
District and regional regulatory bodies	EIA, vacancies, formal reports	Formal submissions through Saran Public Servicing Center, Job Center and Social Protection Office	As required by legislation
Project workers	Employment conditions, grievance mechanism with changes	Information board at SPP onsite office	A weeks after start of Bank financing, then continuously
Suppliers of goods and services	Early warning on required services and significant changes in demand. EHS project requirements	Project related website and email after subscribing on the website	A weeks after start of Bank financing
Job seekers	Vacancies and list of professions that would be required at the plant during operation	Project information board at Ugolnyy Ugolyek and Finskiy Naurys shops, notes to local newspaper, points of contact, formal reports to Saran job center and Social Protection Office, website	
Saran residents	NTS, SEP, bulletins, vacancies, Corporate Social Resp. Program	Project information board at Ugolek and Nauryz shops, whatsapp group on request	A weeks after start of Bank financing, then bulletins once a week
Vulnerable groups	NTS, SEP, bulletins Specific impact and work schedule, LRP	Visits, telephone, email bulletins, text messaging of any changes	
Local media	1.NTS, SEP, 2. detailed project information on request	1. Website, 2. emails to points of contact, press-releases	During construction and on commissioning
Local and international NGOs	NTS, SEP, project schedule, extracts from annual report	Website notes and mailing if registered	As per EBRD disclosure requirements

4.5 Local Population

The local population is represented by the City Council and organised by city councillor. The Saran residents are expected to be interested in the project related jobs and qualification improvement opportunities in the nearest future and in a longer perspective. The CLO will disclose the list of professions that will be required by the project at each phase, regular information on the work progress and the grievance mechanism.

The project information location will be disclosed through the local mass media. The media will also be fed with the project updates regularly and will be expected to disclose it. Nauryz (Finskiy estate) and Ugolek (Ugolnyy estate) shops have been suggested to be the most appropriate places for placing the project information boards.

4.6 Local Media

The CLO will identify a point of contact in the popular regional newspaper Saran gazeti and provide her with initial project information, impacts, benefits and opportunities, explain grievance mechanism and give detailed project information on request. The paper is expected to disclose the project information to a wider audience in an accessible and culturally acceptable form.

4.7 Non-Governmental Organizations

The CLO will establish email contact with representatives of the regional environmental and social NGOs ECOCENTER, EcoObraz to provide them with initial information on the project. The missed NGOs are expected to apply to the CLO through the grievance mechanism.

International NGOs with an interest in the project may obtain information in English at the EBRD's website (www.EBRD.com).

5 VULNERABLE GROUPS²

Residents of Finskiy and Ugolnyy housing estates are closest to the SPP site and are considered to be vulnerable to the poles ramming noise (especially at night) and dust. The CLO will issue bulletins in which he will inform the residents that due to breakages of the ramming machines, night ramming has to continue but that arrangement will be made to conduct night ramming on the most remote from the houses area. The CLO will visit or call to the most exposed to the noise households to evaluate the effectiveness of this arrangement. It is expected that those not included in the list of the exposed to noise can find the CLO phone on the project information boards at the estates shops. The CLO will then include them in the list and monitor the impact regularly.

Those whose livestock is taken to the pastures 4km away may also be affected by the livestock path alteration albeit the distance has not been increased. In anticipation of the access blockage some owners sold all or part of their livestock. The remaining herd went to a smaller area without water with the consequent reduction of the milk yield. At the start of the next vegetative season, with the help of the city veterinary office, the CLO will monitor the number and composition of the livestock in this herd and question the cows owners about the milk yield. If any problem related to restriction of access is identified, he will work with the herders to rectify it.

The construction uses the Ugolnyy estate access road until the own access road is being built. The road is also used by a material base trucks. After practically all parts was delivered, the road condition remained good. Only one house complained about dust but since the complaint was voiced to the Company, the project vehicles speed was controlled to minimise dust. The road watering is also considered. Until the permanent access road is opened, the CLO will establish a regular (at least once a week) communication with all four houses along the temporary access road to evaluate the effectiveness of the measures taken.

The way of the Finskiy residents that visit Ugolnyy graveyard will increase from 630m to 1450m as now they have to go through the main graveyard entry. This however has not bothered the residents that

² Vulnerable groups includes people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by the project than others and who may be limited in their ability to claim or take advantage of related to development benefits. Vulnerable groups in the context of actual or economic displacement also include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities or communities dependent on the natural resource used by the project.

have been interviewed during the social survey. After construction, there will be no noise that may disturb the graveyard visitors. Thus they are not considered as a vulnerable group.

If impacts on the identified vulnerable groups is not mitigated, the CLO will prepare a Livelihood Restoration Plan (LRP) to compensate for the residual impacts. During each decision making process, the CLO will ensure that these vulnerable groups are considered. The CLO will also monitor changes in the community for vulnerability aspects and appearance of other groups. If another vulnerable group is identified, it will also be evaluated and monitored and the most appropriate ways of engaging it in the decision making process will be developed.

6 STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE MECHANISM

The mechanism below is a project specific addition to the general public communication practices the Company is obliged to follow under the legislative requirements (Table 1) or conducts on its own accord. The mechanism is designed on the basis of available information. This mechanism may need to be changed as a result of consultation with the aforementioned stakeholders.

Because common language for all identified stakeholders is Russian, information will be displayed in Russian. International stakeholders will find the Non-Technical Summary and the Stakeholders Engagement Plan in English.

The following information will be disclosed on the Company's website, which is to be developed and launched before the SPP comes to operation:

- Project non-technical summary with the schedule;
- This SEP with the grievance mechanism;
- Vacancies and employment procedures;
- Answers to frequently asked questions;
- Annual report to EBRD on ESAP implementation.

The following information will be disclosed on the information board:

- Project non-technical summary with the schedule
- Grievance mechanism
- Vacancies and employment procedures;
- Community Liaison Officer contacts;
- Project bulletins (A5 size) describing completed and planned tasks identified impacts, impact mitigation measures, answers to stakeholders comments and corrective actions taken.

During the SPP operation annual reports on environmental and social performance and summary of grievance handling will be given to the rural area council to disclose and on the project related website.

Most grievances and suggestions are expected to be received through mailboxes located in the city council, on the web site and via e-mail.

7 RESOURCES AND RESPONSIBILITIES

The Community Liaison Officer (CLO) reports directly to the Company director. He will perform the following functions:

- Maintain the disclosed project information up to date through preparation of bulletins;
- Process grievances (receipt/collection, registration in the database, response deadlines watching, sending mail responses and posting information on information board)
- Control implementation of remedial actions;
- Participate in disputes resolution;

- Regular reassess the project impact on vulnerable groups
- Assess the effectiveness of the mechanism of interaction with stakeholders every year and rework this plan accordingly;

8 MONITORING AND REPORTING

The Company will analyse received grievances and given answers at the end of each month. The CLO will report annually on environmental and social performance, implementation of commitments in the environmental and social action plan, and the implementation of the grievance mechanism. The report will be posted on the project related website and in the locations stated in Table 2.

9 GRIEVANCE REDRESS MECHANISM

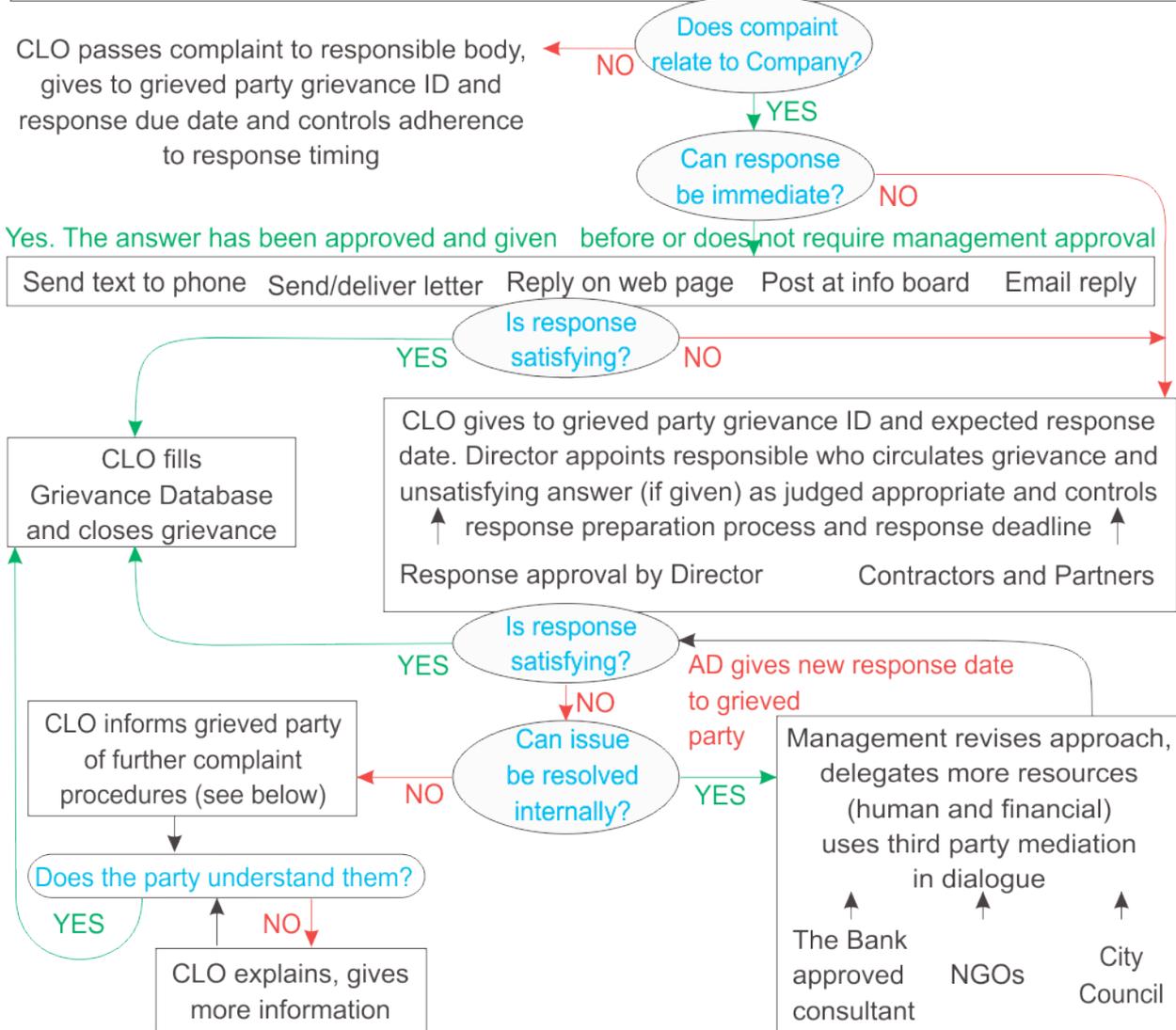
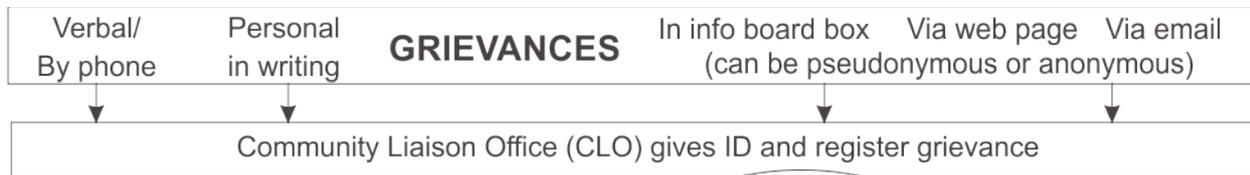
If someone has a complaint or grievance, this will be dealt through grievance and application register or a grievance mechanism that will be managed by the CLO. The objective is to resolve problems in a timely manner. The mechanism will be displayed at the locations shown in Table 2.

The stakeholders can submit their grievance in a box on the information boards, call or write a letter or an email to the CLO who will enter it in the grievance database (Table 3). The database is for controlling the grievance handling process. This mechanism does not limit the public's rights to use the conventional routes to place grievances and the available legal system.

Depending on the grievance form, the CLO will reply accordingly, as shown in the flowchart below, ensuring that the grieved party knows their rights, the date when the reply is due and that the grievance will not be closed until the party is satisfied with the answer or choose to follow further complaint procedures given below.

Table 3 Grievance database fields. ID example stands for the first questions on September 29th.

Grievance ID	Name / address	Question /Grievance	Answer method	Given answer	Status	Is response satisfying
2018.09.29.01			Text to mobile		reply date, closed etc.	yes, no



- Further complaint procedures:
1. Write a formal complaint to the Saran city council, request the reply date;
 2. Write a formal complaint to the Saran city Prosecution Office;
 3. Appeal to the Aarhus Convention Implementation Committee by calling to +7 7212 562922 or sending an email to aarhus@inbox.ru

GRIEVANCE FORM	
Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<ul style="list-style-type: none"> • By Post: Please provide mailing address: _____ • By Telephone: _____ • By E-mail _____
Preferred Language for communication	<ul style="list-style-type: none"> • Russian • Kazakh
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	
	<ul style="list-style-type: none"> • One time incident/grievance (date _____) • Happened more than once (how many times? _____) • On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature:

Date:

Please return this form to Community Liaison Officer (CLO) Mrs. Yuliya Allakhverdiyeva

Tel.: +77052929251; E-mail: ayulena@gmail.com