Public Disclosure Authorized

SFG2926 V1

Republic of Tajikistan

Nurek Hydropower Rehabilitation Project

Environmental and Social Impact Assessment

Stakeholder Engagement Plan

Public Disclosure Authorized

Barqi Tojik Open Joint Stock Holding Company

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LIST OF ABBREVIATIONS AND ACRONYMS

BT	Barqi Tojik
EE	Environmental Expertise
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GRM	Grievance Redress Mechanism
ha	Hectare
HPP	Hydropower plant
IFC	International Finance Corporation
MW	Megawatt
NGO	Non-Governmental Organization
OP	Operational Policy
O(J)SHC	Open (Joint) Stock Holding Company
PMC	Project Management Consultant
PPE	Personal Protective Equipment
RT	Republic of Tajikistan
SEP	Stakeholder Engagement Plan
SCIDP	Stakeholder Consultation and Information Disclosure Plan
UNECE	United Nations Economic Commission for Europe
WBG	World Bank Group

1. INTRODUCTION

1.1. Purpose and Objectives of the Stakeholder Engagement Plan (SEP)

The project is carrying out disclosure of information and public consultations in accordance with Tajik regulation and good practices recommended by the World Bank. Dialogue is being established with all stakeholders who are directly or indirectly involved in the Project.

The stakeholder engagement plan aims to engage dialogue about the project, to facilitate its implementation, and allow consultation and participation. It includes the following objectives:

- Inform about the project and communicate the relevant environmental and social data;
- Provide useful and clear information for people affected by the project;
- Conduct public consultations;
- Take into account the views expressed during the public consultations in the implementation of the project.

The SEP is a living document and the present document is only the first edition. As the project is implemented, the Owner will be responsible to update it, as needed. In particular, future editions will have to specify how to handle the coming consultations and the participation process with the public.

2. NUREK HPP REHABILITATION AND DAM SAFETY PROJECT DESCRIPTION

2.1. Project background

The Nurek Dam, commissioned in 1972, is the highest embankment dam in the world (300-meters high). The power plant has 3000MW of installed capacity. The dam controls the flows of Vakhsh River, which is one of the major tributaries of the Pyanj River, which becomes the Amu Darya after its confluence with the Vakhsh and Kotarnihon rivers. The Amu Darya is the largest river of Central Asia, and one of the two main tributaries of the Aral Sea.

Nurek Hydro Power Plant (HPP) is a critical power generation asset for Tajikistan because it supplies more than 72 percent of the electricity produced in Tajikistan. In addition to electricity generation, the reservoir directly supplies irrigation water for about 70,000 hectares (ha) of land via a tunnel with additional irrigation of tens of thousands of hectares made possible by the regulation of the Vakhsh River.

However, due to the vibration of the turbines' generators and the fatigue of the runner's metal, the recorded upper limit output was not higher than 2320 MW (compared to the installed capacity of 3000 MW). In addition, the sediment accumulation in the reservoir has resulted in a reduction of storage capacity.

The purpose of the rehabilitation project ("the project") is multiple:

(i) Restore the generation capacity of Nurek HPP through refurbishment of the generating units and the balance of the plant;
(ii) Increase efficiency of the generating units through improved hydraulic design and installation of higher efficiency equipment; and
(iii) Enhance the safety of the Nurek dam through rrehabilitation of spillway tunnels, refurbishment of spillway gates/hoisting system, improvement of protection on permeable zone of the embankment dam above the core zone crest, measures to enhance safety against seism and hydrological risks.

The rehabilitation of the Nurek HPP will be carried out in two phases. The first phase includes the rehabilitation of three generating units and some of the balance of plant[1], and critical dam safety works. The remaining six units and the remaining balance of plant will be rehabilitated in the second phase of the project.

2.2. Potential environmental and social issues

2.2.1. Baseline synthesis: main issues

For the physical environment, the hydrology and downstream water quality are major aspects on which the study has been focused. Indeed, downstream of Nurek, many hydroelectric run-of-river dams depend on water released by Nurek HPP, and tens of thousands of irrigated hectares benefit from the regulation effect of the Nurek HPP on the Vakhsh River. Water quality and hydrology have already been impacted by the construction of the dam. The project will therefore not have any impact on the quality of the water, especially considering the presence of inhabited areas immediately downstream of the dam and other water uses.

In the project area, terrestrial ecological issues are moderate to low. The presence of protected areas downstream of Nurek, upstream and downstream of the Vakhsh River and Pyanj River confluence have to be kept in mind, particularly because of the existence of Tagai, a specific kind of floodplain habitat in desert areas of Central Asia. Finally, regarding the aquatic environment, even if the dam construction has already participated in reducing fish interests in the area, aquatic life remains a significant component sensitive to industrial water pollution.

The human environment combines various issues notably the presence of Nurek city in the immediate vicinity of the site. The localities traversed by the access road to the site will be impacted by the passage of vehicles carrying people and equipment. Downstream, inhabited areas are also subject to a safety risk associated with the presence of the dam. Finally, the issue of national electricity production is also a key criterion for analyzing the impact of the Nurek HPP rehabilitaiton project.

[1] Balance of plant: This term refers to all key infrastructural components of the plant excluding the turbines.

2.2.2. Project impact and proposed measures

The project involves 20 identified impacts. 16 are negative and 4 are positive. The majority of impacts concern (i) potential pollution due to refurbishment wastes (hazardous and non-hazardous), (ii) health and safety risks that may affect workers but also local communities and (iii) regular operation of the power plant. No impact has been identified regarding downstream hydrology, upstream reservoir level and downstream water demand/use. The table below prioritizes these impacts.

Table 1 – Summary of the project impacts

Environmental component	Impact						
	Ref.	Source	Type	Description	Project phase		Importance
					Refurbishment	Operation	
Soil, water surface quality	I06	Waste production	Negative	Asbestos removal and manipulation risks	x		High
Health and safety - workers	I06	Waste production	Negative	Asbestos removal and manipulation risks	x		High
Health and safety - workers	I07.3	Work with or close to electrical equipment	Negative	Electrical hazards risks	x		High
Production of energy	I11.2	Involuntary stoppage of one or several units due to issue in refurbishment works	Negative	Electrical production impacts	x		High
Soil, water surface quality	I04	Waste production	Negative	Refurbishment waste pollution	x		Moderate
Water Quality	I05.1	Waste pollution	Negative	Water pollution risk	x		Moderate
Aquatic habitats and fauna	I05.2	Water pollution	Negative	Potential downstream aquatic habitats and fauna perturbation	x		Moderate
Health and safety - workers	I07.2	Noisy tasks	Negative	Noise emission exposure risks	x		Moderate
Health and safety - workers	I07.4	Hot work	Negative	Welding / hot work hazards risks	x		Moderate
Health and safety - workers	I07.5	Increase of vehicles and traffic in Nurek HPP area	Negative	On-site traffic risk	x		Moderate
Health and safety - workers	I07.6	Work at a height	Negative	Working at heights risk	x		Moderate
Health and safety - communities	I09.1	Waste production, spill, etc.	Negative	Risk of exposition to water pollution	x		Moderate
Health and safety - communities	I09.3	Transport of Hazardous Materials	Negative	Transport of Hazardous Materials and risks for communities	x		Moderate
Health and safety - workers	I07.1	Working with or close to moving equipment	Negative	Associated risks with rotating and moving equipment	x		Low
Health and safety - communities	I09.2	Increase of vehicles and traffic in the access road outside Nurek HPP	Negative	Traffic and pedestrian safety risks for communities	x		Low

Environmental component	Impact						
	Ref.	Source	Type	Description	Project phase		Importance
					Refurbishment	Operation	
Dam safety	I11.1	Involuntary stoppage of one or several units due to issue in refurbishment works	Negative	Temporary reduction of spillage capacity	x		Low
Socio-economic local conditions	I12.1	Arrival of workers	Negative	Socio-economic tensions	x		Low
Hydrology	I01	Hydro-electromechanical refurbishment	-	Vakhsh River's downstream flow regime modification			None
Reservoir water level	I02	Modification of the operating rules	-	Nurek HPP reservoir management level modification			None
Dam safety	I03	Modification of the current discharge water capacity	-	Flood risk during refurbishment and operation			None
Climate risk	I13	Reservoir	-	Effects of Nurek Reservoir on local climate			None
Socio-economic local conditions	I12.2	Arrival of workers	Positive	Job opportunities for local populations	x		Low
Socio-economic local conditions	I12.3	Arrival of workers	Positive	Development of economic opportunities	x		Low
Health and safety - workers	I08	Installation of proper aeration, lighting and railing for stairs	Positive	Decrease of working health and safety risks in tunnels		x	Moderate
Dam safety	I10	Implementation of recommendations	Positive	Dam safety improvement		x	High

Source: Nurek ESIA D-8

Three negative impacts were identified as "high":

(i) **Asbestos** is present in equipment that should be refurbished. Asbestos removal and manipulation represent a major health risk that requires special precaution with respect to workers' health and safety. This risk appears twice because it is direct and indirect (via the pollution of the working environment);

(ii) The dismantling, installation and testing phases in such projects represent **electrical hazards for workers**;

(iii) During the manipulation of electrical components/devices, involuntary stoppage of one or several units can occur. This can lead to a **reduction of electrical production and the fluctuation of the voltage in the electricity grid**.

To prevent these impacts and risks, the Contractor should implement several environmental plans within an overall Environmental and Social Management Plan (ESMP) to be monitored by the Project Management Consultant (PMC), which has already been hired by BT.

The Environmental Health and Safety plan details the measures for preventing pollution, ensuring waste management and ensuring the safety conditions for workers and communities.

A Pedestrian and Traffic Safety Plan will be implemented to prevent injuries due to project vehicles.

The Emergency Preparedness and Response Plan proposed by the Contractor should include all measures to face an emergency situation (pollution, fire, work incidents, dam operating problems, asbestos spills, etc.).

Finally, the implementations of “work permits” (strict procedure) will ensure the prevention of power plant operation issues.

2.3. Project Timeline

As a base case scenario, it is considered that each unit will be immobilized one after the other for rehabilitation. In these conditions, the project will run over a period of 10 years.

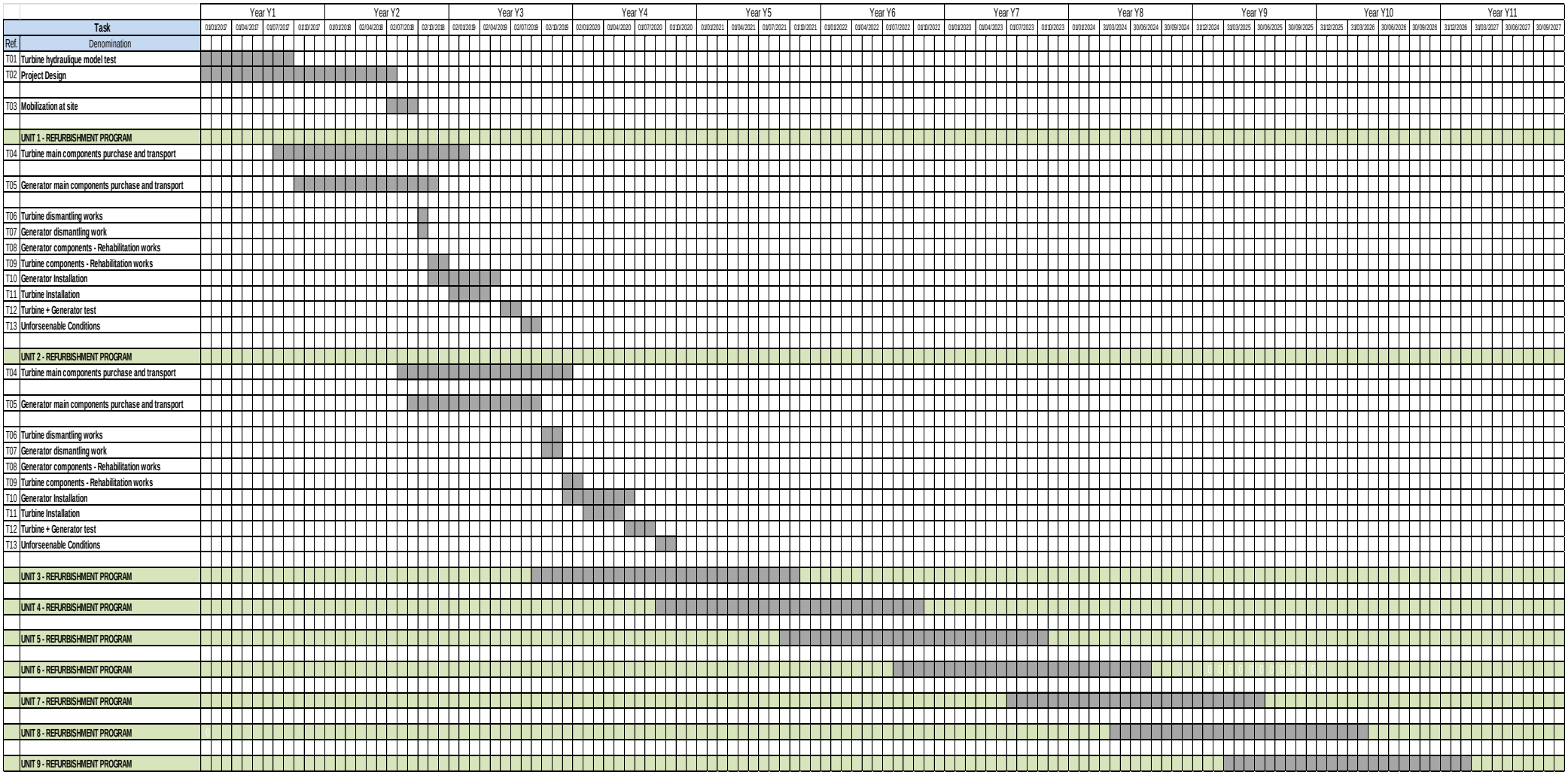
The rehabilitation of the Nurek HPP will be carried out in two phases. The first phase is expected to comprise the rehabilitation of three generating units, some of the balance of plant rehabilitation and critical dam safety works. The remaining six units and the remaining balance of plant will be rehabilitated in the second phase of the project.

The first phase, consisting of modeling and design, is scheduled to last 5 years. The site mobilization will take 3 months. The site activities are on the critical path and last between 10 and 11 months per unit (between the dismantling task and the finalization of the test task). Each turbine and generator will be stopped, dismantled, rehabilitated and reinstalled.

Only one turbine will be stopped at a time but the procurement and transport phase of a turbine will start during the dismantling and installation phase of the previous one. This is in order to be ready to start the dismantling of the following turbine when the refurbishment is completed on the previous one.

The detailed schedule is available in Figure 1.

Figure 1 – Project refurbishment work schedule



*In this table, refurbishment tasks for unit 3 to 9 are the same as for turbine 1 and 2

3. STAKEHOLDER ENGAGEMENT STANDARDS APPLICABLE FOR THE PROJECT

3.1. National Public Participation Requirements

This section describes regulatory and legal requirements for public participation in the environmentally important decision making that are stipulated in the legislation of the Republic of Tajikistan.

The country's legislation on access to environmental information, public participation in environmental issues and access to justice in environmental issues makes up number of laws, one of which is the framework Law on Environment Protection. The laws provide a range of general rules, definitions and principles, but few procedural rules. Article 12 of the Environment Protection Law proclaims the right of citizens to live in a favorable environment and to be protected from negative environmental impacts. Citizens also have the right to environmental information, as well as to participate in developing, adopting, and implementing decisions related to environmental impacts (Article 13). This is assured by public discussion of drafts of environmentally important decisions and public ecological reviews. Public representative bodies are responsible for taking into consideration citizens' comments and suggestions.

On 3 October, 2006 the Government of the Republic of Tajikistan approved Resolution No. 464 on procedure for environmental impact assessment (EIA[2]), which takes place, for certain new projects and activities with significant environmental impacts, at the environmental decision-making stage, before the State ecological expertise.

Section IX of the aforementioned document covers public participation in the environmental impact assessment procedure. It requires developers to inform the public about new projects and activities that are deemed to be subject to ESIA, using mass media and Internet; provide public access to ESIA documentation; consider and make records of written submissions by representatives of the public; hold public hearings; and record public opinion in its minutes.

The Law on the Environmental Expertise (EE) also ensures the right of the citizens to conduct a Public Environmental Expertise (art. 7). On 17 July 2001 Tajikistan acceded to the 1998 Aarhus Convention, the provisions of which have priority over domestic law that also stipulates the rights for Public EE.

3.2. International Conventions and Guidelines for Public Consultations and Disclosure

There are two international conventions by the United Nations Economic Commission for Europe (UNECE) on the subject of the arrangement of public review and discussions:

[2] In the case of Nurek HPP refurbishment project, the EIA specifically develops the social aspect and is therefore an ESIA. As a result, it is this last acronym that is used in the rest of this SEP.

- Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus, 1998); and
- Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991).

Both conventions bind the state authorities to undertake actions related to providing information to and consultations with the publics. Although the Republic of Tajikistan has not formally ratified Espoo Convention to date, the Project endorses the principles set forth therein and will aspire to follow them in its activities.

3.2.1. World Bank Operational Policies

The World Bank's Environmental Assessment Policy (Operational Policy 4.01) requires that for all Category B projects during the Environmental Assessment process "the borrower consults project-affected groups and local nongovernmental organizations (NGOs) about the project's environmental aspects and takes their views into account. The borrower initiates such consultations as early as possible. … In addition, the borrower consults with such groups throughout project implementation as necessary to address EA-related issues that affect them." A Category B project is one that has potential adverse environmental impacts on human populations or environmentally important areas--including wetlands, forests, grasslands, and other natural habitats that are Category A projects. Impacts are site-specific; and few if any of them are irreversible. The Nurek HPP Rehabilitation Project is a Category B project.

The policy also calls for adequate disclosure of documents, "For meaningful consultations between the borrower and project-affected groups and local NGOs on all Category A and B projects proposed for IBRD or IDA financing, the borrower provides relevant material in a timely manner prior to consultation and in a form and language that are understandable and accessible to the groups being consulted."

Key elements for stakeholder engagement and consultations include the following:

- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated;
- Take account of the outcome of the engagement process with affected communities in the identification of risks and impacts associated with the project;
- Maintain stakeholder engagement as a continuous process that involves stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and the ongoing reporting to affected communities;
- Identify the range of stakeholders that may be interested in project activities and to facilitate a dialog with all stakeholders through a process of external communications;
- Provide affected communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism;

- Undertake a process of consultation in a way that provides the affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them;
- For projects with potentially significant adverse impacts, to conduct an Informed Consultation and Participation (ICP) process that will result in the affected communities' informed participation. This process should be documented, in particular the measures taken to avoid or minimize adverse impacts on affected Communities, and will inform those affected about how their concerns have been considered;
- Establish a grievance mechanism to receive and facilitate resolution of affected communities' concerns and complaints about the project's environmental and social performance.

Particular attention is to be paid to vulnerable individuals and communities in designing and implementing consultations.

3.2.2. OSHC Barqi Tojik Internal Regulations and Standards

BT and the Project implement existing national legal and regulatory framework pertinent to stakeholder engagement.

In particular, BT has set up a Grievance Redress Mechanism (GRM) for its current operations. This GRM will be used as the basis for the GRM of the project (see section 7.

4. IDENTIFICATION OF PROJECT STAKEHOLDERS

4.1. Methodology

4.1.1. Principles

In order to meet best practice approaches, the following principles for stakeholder engagement form the basis of the SEP:

- Openness and life-cycle approach: public consultations should be arranged for all development initiatives during the whole life-cycle, carrying them out in an open manner, free of external manipulation, interference, coercion or intimidation;
- Informed participation and feedback: information should be provided to and widely distributed among all stakeholders in an appropriate format; opportunities should be provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns, for improving management decisions based on public feedback (where relevant), and also building long-term relations;
- Inclusiveness and sensitivity: stakeholder identification should be undertaken to support better communications and build effective relationships. The participation process should be inclusive, not exclusive. All stakeholders should be encouraged being involved in the consultation process. Equal access to information should be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention should be given to vulnerable groups.

4.1.2. Stakeholders Analysis and identification

The Stakeholder Engagement Plan (SEP) includes a stakeholder identification procedure. The following criteria have been used for the identification of stakeholders:

- Liability: project implementation or on-going operations may result in legal, financial or other liabilities of the proponent to a social group;
- Influence: a social group may be able to substantially influence project implementation or on-going operations;
- Partnership: there are opportunities for building partnership relations between the Company and a given social group in the framework of the project implementation or on-going operations;
- Dependency: project implementation may significantly affect a given social group, in particular, it may affect vital interests of its representatives if they are dependent on the project on-going operations in economic or financial terms;
- Representation: a social group may have a right to represent interests with regard to a project or on-going operations, and this right is legitimated through legislation, custom and and/or cultural specifics;
- Expressed interest: a social group and/or individuals may express interest to a project or on-going operations, and this group is not necessarily directly affected by the planned or current activities

The stakeholder map is included in Annex 3.

4.2. Stakeholder Categorisation

The principles set out above were applied by the Public Organization Kuhiston on behalf of Barqi Tajik, when it was charged with conducting consultations on the draft ESIA.

5. CONSULTATIONS

Draft ESIA – 2016

Consultations were undertaken by the Public Organization Kuhiston, on behalf of Barki Tajik, on the draft ESIA. A range of issues were raised on matters ranging from employment, health risks, transportation and traffic, participation of women, and water discharge (details of the issues raised are in the ESIA section 7).

Feedback Consultations – Spring 2017

A second round of consultations – feedback consultations – will be carried out in April 2017. The consultations will focus on the following:

The status of the project and of the associated administrative procedures, in particular the ESIA. In addition, responses to unanswered questions or unresolved issues raised during the first round of consultations will be provided. In addition, the final ESIA will be disseminated. The consultations will be held with the support of a consultant (e.g. an NGO), which will be selected by BT. The local community will be provided sufficient advance notice through the heads of the local administrations. BT or its consultant will prepare an update on the status of the project and written clarifications to questions raised during the public consultations on the draft ESIA.

Consultations – Implementation Phase

During project implementation, additional consultations will be organized. The consultations will occur at least once a year. Each consultation, as needed should include a feedback consultation or communication to respond to issues that were not resolved in the consultations. Feedback consultations should occur no later than six months after the initial consultations. An indicative timeline is as follows:

Year 1 Consultations – Spring 2018

Year 2 Consultations – Spring 2019

Year 3 Consultations – Spring 2020

Year 4 Consultations – Spring 2021

Year 5 Consultations – Spring 2022

There will be additional communication with the local population in Nurek and Dukoni *jamoat* and Puli Sangin *jamoat* when critical work and activities are planned. Also, there will be the possibility of exceptional meetings in case of a particular event or on a specific subject.

Other forms of communication will also be used outside of consultations, as needed, using channels such as local BT offices and officers, local authorities, pamphlets and/or brochures, etc.

Subsequent consultations will use the stakeholder mapping prepared in 2016 to identify relevant stakeholders and appropriately target the form and content of the consultations. As needed, the mapping will be updated to take into account changes in stakeholder numbers, interests, and influence.

The consultations will be organized based on the principles described above (Section 4.1.1.). As relevant, the consultations will be conducted in Russian and/or Tajik. The timing of community consultations will be agreed upon with local authorities. Local BT offices should also be involved in the preparation process. Sufficient information on the consultations and their content (such as time, location, and presentation material) will be shared with local communities and other stakeholders in advance and no less than two weeks before the consultations. In planning all consultations, particular attention will be paid to ensure the inclusion and active participation of all segments of the population including those vulnerable to exclusion such as women, the disabled, and the youth.

All consultations will be documented in reports. Suggested issues to be included in the consultation reports are as follows:

- Methodology used to organize consultations, including identification of participants, information shared with stakeholders, formats of consultations, accommodation for participation of vulnerable individuals.
- Participants of consultations, including demographic information of participants, relevant affiliations such as local authorities, community based organizations, and local associations, and location of consultations.
- Issues/questions raised at the consultations, including responses provided and issues/questions not answered or resolved.
- Summary of issues that need to be considered and responses provided to stakeholders and plan for providing feedback.
- Recommendations for project activities and for SEP.

Throughout this process, the SEP will be updated according to the evolution of the project, the measures taken, the intervention of new stakeholders, any potential new issues that may arise, etc. These are the operational documents of the project.

Disclosure

Linked to the consultation process, the ESIA and related documents will be made available to stakeholders, including public disclosure. The disclosure of the ESIA will include, but not be limited to:

- Posting the final ESIA and any further updates on BT's website in accessible languages, including Russian and Tajik.
- Making a physical copy of the ESIA in relevant languages (Russian, Tajik) in areas that are accessible to the public at no cost in Dushanbe and relevant regions and sub-regional centers.
- In addition, simplified documents that describe the ESIA (for example, power point presentations) will also be made available to stakeholders at national, regional, and sub-regional levels.

  The draft ESIA was disclosed during the initial 2016 consultations. It is also available online on the web-site of BT. The final ESIA will be posted on the World Bank website and the BT website on or before January 26, 2016.

6. RESOURCES AND RESPONSIBILITIES

In the current state of progress of the project, the main stakeholders involved in the implementation of the SEP aspects of the project are:

- **BT as the project owner**: BT is responsible for implementation and monitoring of the project activities to ensure those are consistent with the requirements of the ESMP. BT will provide all the resources the support necessary to ensure that the ESMP requirements, including the SEP, are met;

- **PMC**: The role of the PMC is to prepare bidding documents for main rehabilitation works, conduct technical supervision of the project works implemented by contractors, support BT with procurement, contract administration, and ensuring compliance with ESMP. The PMC has already been selected and it has a designated safeguards specialists, which will be conducting monitoring of the project refurbishment activities to make sure they are consistent with requirement of ESMP and will be submitting monthly reports to BT on such compliance, including issues identified, measures proposed to rectify them, and status of implementation of previous recommendations. The PMC will also ensure that appropriate safeguards provisions are included into the bidding documents for rehabilitation works.
- **NGO/consultant to support with SEP**: BT will be hiring an NGO/consultant to implement the SEP during the project implementation, including the above-mentioned consultations during project implementation and submission of the required consultation reports.

6.1.1. Supervision of ESMP Implementation: PMC

The Project Owner shall be responsible for the execution of the ESMP measures, through support by the PMC. The PMC, which has already been hired by BT, has a qualified environmental professional specialized with experience in similar projects, including ensuring compliance with requirements of EHS. PMC will be in charge of the supervision, control and monitoring work, and its monthly reports to BT will contain a section on safeguards compliance of the project.

6.1.2. Implementation of SEP

In relation to implementation of SEP, BT will hire an NGO/consultant to support with implementation of SEP during project implementation period: The main responsibilities of this NGO/consultant will include:

- Manage the implementation of the SEP, including the preparation of consultation materials, the implementation of the consultations, the review of findings from the consultations, and the integration of relevant findings into project implementation.
- Keep abreast of attitudes, expectations and problems occurring within the communities and workers.
- Carry out an internal and external communication system with communication actions deemed.
- Carry out an internal and external communication system with communication actions deemed.
- Periodically updating the SEP, as needed.
- Providing feedback to BT on implementation of the SEP, including submitting inputs to regular reporting of the BT to the World Bank.

If needed, the NGO/consultant will receive technical assistance under the project. This assistance will for example need to ensure support for organizational, planning and finance management.

Because the Vakhsh is an international waterway, downstream countries should be informed of the scope, extent and duration of the works. The notification to the riparians has already been sent by the World Bank with a letter dated January 12, 2016. The notification was sent by the World Bank following the request from the Borrower.

Implementation of the SEP is included in project funds/will be provided by the client. It is expected that it will cost approximately US$30,000 per year.

7. PUBLIC GRIEVANCE REDRESS MECHANISM (GRM)

7.1. Introduction

A **grievance** is a complaint or concern raised by an individual or organization who judges that they have been adversely affected by the Project during any stage of its development. Grievances may take the form of specific complaints for actual damages or injury, general concerns about project activities, incidents and impacts, or perceived impacts.

Complaints should be addressed promptly using an understandable and transparent process that is readily acceptable to all segments of affected stakeholders. The mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both the Project Owner and stakeholders. The mechanism must not impede access to other judicial or administrative remedies.

The Grievance Mechanism provides a formal avenue for stakeholders to register concerns and for these to be addressed in good faith and through a transparent and impartial process. Grievances are monitored to provide signals of any escalating conflicts or disputes.

This section details the proposed Grievance Mechanism that will be implemented in this project.

The Grievance Mechanism should:

- Be transparent and fair;
- Be accessible and culturally appropriate;
- Be open and provide for regular communication;
- Keep written records;
- Promote dialogue;
- Resolve all grievances as quickly as possible.

7.2. Project GRM implementation

BT already has an established Grievance Redress Mechanism. The Grievance Mechanism has a legal basis (including the Law of Republic of Tajikistan “On citizens appeal”), clear procedures, timing, responsible parties, the Grievance Form and contacts.

The main objective is to receive and facilitate resolution of customers' concerns and complaints about the energy supply and associated services.

Receiving and recording the grievance

Grievances may be lodged by a variety of different means (direct reporting to the BT, to the Project Management Consultant, local authorities).

Grievances submitted to BT

Grievances can be submitted directly to BT in writing, or by email at the following addresses and telephone numbers:

Qurbonova Saida Haidarovna – Leading Specialist on Grievance and Appeals of General Department of OSHC Barqi Tojik

Address: 64, Ismoili Somoni Ave., 734026 Dushanbe, Tajikistan

Tel: +992 37 295 202, +992 37 235 8674, +992 37 235 8684, +992 44 610 6050

e-mail: barki.tojik@gmail.com

Online submissions can be made on BTs website. A Grievance Form is located at http://barqitojik.tj/en/feedback/new.php under the section of "Treatment of Citizens" Complainants can fill out a correspondence form.

Grievances submitted to local BT offices

Grievances can also be submitted to local BT offices. Local BT offices will ensure the link between local communities and BT headquarters.

Grievances submitted to local authorities

Given that local people may struggle to get in touch with the leading specialist at BT, which will be responsible for GRM and whose contact details are provided above, the heads of local communities and the offices of local administrations will also be used to collect complaints regarding the project during its implementation.

Local administration bodies in the project areas will assign specific staff member who will accept and register complaints/questions from local community members and pass those to the central office of BT. The contact details of those particular local administration office personnel will be made available to the general population in the project area by posting the printed copies on the walls of the local administrative building and during the feedback consultations, which are planned in Spring of 2017.

Grievances submitted to Project Management Consultant (PMC)

The local affected population may also submit the grievances to the PMC, which will communicate those to BT. The contact details of the relevant specialist at PMC will also be provided for affected people communicate their grievances. The PMC has already been hired by BT and its responsibilities also include (in addition to main responsibility of

technical supervision of the project) supervision over implementation of ESMP by the Contractor.

Acknowledgement and Registration

Grievances that are forwarded to or made to the ESU shall be recorded grievance on a standard grievance form. The ESU shall ensure that the name of the localities, the date recorded, the name of the complainant and the name of the person that received the grievance are noted. If the grievance is received directly by the ESU, it shall be recorded directly into the Grievance Form.
Once the grievance is recorded, the stakeholder shall be provided with a copy of the Grievance Form signed by the complainant and by the staff member responsible. This copy serves as an acknowledgment that the grievance has been received.

Grievances made to BT will include the details of grievance, the problem, to whom the raised matter has occurred, when, where and how many times, as relevant.

Site Inspection, Investigation and Resolution

As necessary, the ESU shall organize a site inspection to check the validity and severity of the grievance. The inspection shall be undertaken within seven days of receiving the grievance. The assigned individual shall then work with other relevant members of the project team to investigate the problem and identify measures to resolve the grievance as appropriate. This could involve provision of information to clarify the situation, undertaking measures to remedy actual problems or compensate for any damage that has been caused.

In addition, specific problems to the project could be then dealt with during the advancement meetings at BT, for example on a weekly or at least monthly basis, according to the nature of the complaint.

Where a grievance is found not to be a real problem, a clear explanation shall be provided to the complainant.

Response

A formal response detailing how the grievance has been resolved shall be provided to each complainant within 30 days. Where resolution is delayed, the complainant shall be provided with regular updates on progress. Following-up with the complainant will be necessary to ensure that the matter is resolved and the complainant is satisfied.

Awareness raising of GRM

The details of the GRM will be publicized as part of the feedback consultations. In addition, relevant materials will be shared with the relevant communities.

Reporting on the GRM

PMC shall prepare monthly reports on the implementation of GRM for the project. In addition, periodic reports on the GRM implementation will be included in the periodic reporting from the BT to the World Bank.

The reports should provide an overview of grievances, directly or indirectly related to the project implementation. Additional information should include:

- Nature of the grievances.
- Available information on the complainants (including demographic – student, parent, gender, etc.)
- Information on where the grievances were received and in what format.
- Information on the status of the grievances (resolved, under review, etc.).
- Information on how grievances were resolved.
- Information on unresolved grievances and why they are not yet resolved.

The reports may also include recommendations for improving the GRM or project design. These recommendations should be based on the monitoring of the GRM, specifically its functionality GRM and the types of grievances that have emerged.

8. CONTACT DETAILS FOR THE PUBLIC

Pending the establishment of a specific contact during the project implementation, the contact will be that of the current BT's GRM, namely:

- **Qurbonova Saida Haidarovna** – Leading Specialist on Grievance and Appeals of General Department of OSHC Barqi Tojik
  Address: 64, Ismoili Somoni Ave., 734026 Dushanbe, Tajikistan
  Tel: +992 37 295 202, +992 37 235 8674, +992 37 235 8684, +992 44 610 6050
  e-mail: barki.tojik@gmail.com

ANNEXES

Annex 1 - Description of the stakeholders

The tables below summarize the current state of knowledge on national (Table 2), regional (Table 3) and local (Table 4) stakeholders.

National Level

Table 2 details all identified stakeholders at national level.

Table 2 – Stakeholders at national level

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
Ministry of Energy and Water resources (MEWR)	* Regulates legal norms in the field of fuel power production, natural resources, including renewable energy sources in the industry, technical and technological field, construction industry, in the food and food processing industry; * Coordination, management and supervisory over relevant state services, State energy sector control service, and other organizations and enterprises under the Ministry.	Regulatory and coordinating role	High power	High interest in the project and its impacts
OJSHC Barqi Tojik	* Production transportation, transmission, distribution and sale of electrical and heat power energy mainly on the local market of the country; * Deals with issues of country's power stations and grids operation, generation, transmission, distribution and sale of electrical and heat power energy mainly on the local market of the country; * OJSHC "Barqi Tojik" is, as entrusted by the Government of the RT, the major shareholder of the joint-stock companies in the energy sector, has the right to own, use and disposal of property of the enterprises and entities under its management; * Includes 24 joint-stock energy objects, including, Nurek HPP. Employs over 12,000 persons.	Owns Nurek HPP and the Project	High power and influence	High interest in the project
Nurek HPP	* Produces country's 70% electrical energy; * Is an Open Joint stock Company managed by Barqi Tojik	Key beneficiary of the Project	High power and influence	High interest in improving its operation
Committee on Environment Protection (CEP)	* Supervision over environment protection and environmental planning and compliance; * Drafting and implementation of scientific and technical policies in the area of environment protection; * State control over protecting lands, surface and ground water, air, flora and fauna, fishery resources.	CEP performs an independent functions, mainly through monitoring, supervision, approval and authorization of actions within the	High in providing clearance of ESIA	High interest in environmental impacts of the Project

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
		subdivisions; Clearing the ESIA/EIA		
State Investment and State Property Management Committee	Has the following responsibilities in the area of investment and foreign aid: * Develop and implement measures aimed at improving the country's investment climate setting up legal and other provisions promoting investments; * Take part in developing and implementing investment programs; * Promote foreign investments for implementation of State programs and priority social projects, including international loans and grants; * General coordination of aid mobilization, management and monitoring process, ensures implementation of plans and activities provided in the programs and strategies for mobilization, management and monitoring of foreign aid; * Participates in drafting and concluding international agreements on investments in cooperation with other relevant ministries and agencies; * Collaborates with interested agencies on accounting and records related to mobilization and management of investment and all types of external aid; * Facilitates and manages appraisals of contracts and other documents related to investment projects; * Ensures that all authorizations and permissions necessary for project implementation are in place; * Monitors and controls implementation of investment projects and provisions of the contracts; * Takes steps to ensure transparency, fairness and effectiveness of procurement of goods, works and services in the context of State Investment Projects; * Organizes bid opening procedures for tenders on procurement of goods, works and services in the context of State Investment Projects; * Monitors procurement activities in project coordination units (PIUs/PMUs)	Conducts bids and tender openings for goods, works and services; monitors procurement; participates during loan negotiations etc.	Power low/influence might be high due to risk of delayed tendering/bid opening procedures and/or procurement	High interest in the project due to its strategic priority
Ministry of Health and	* Is key executive government body, responsible for drafting and implementing state policy and regulating legal norms of the activity in the field of healthcare and social protection of the	Sanitary and Epidemiological Service	High power and influence	Interest in Project and its

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
Social Protection of Population (MHSPP)	population; * Endorses the order for managing statistical reporting in the health and social protection sector; * Caries out sanitary and epidemiological surveillance; * Carries out activities on ecological and radiation safety, environment protection and sanitary protection of the country; * Develops proposals for improving the order of social support, particularly targeted social assistance and payment of benefits and compensation to the poor households	(SES) will be monitoring and controlling infectious diseases trend, including water borne diseases, coordinating/ cooperating on EMP implementation and compliance; Regulating and implementing the targeted social assistance for vulnerable HHs.		impact high (with regards EMP implementation and compliance). Particularly, in case of foreign workers/construction camps if any
Ministry of Labor, migration and employment of the Republic of Tajikistan (MLME)	* Develops draft normative acts and laws in the field of labor, migration, employment, livelihood level of the population, basic vocational education as well as plan of action and forecast indicators of the Ministry's activity and submits them to the Government of the RT; * In collaboration with other relevant line ministries and agencies, develops proposals on priority directions of the state policy in the area of labor and population's livelihood level; * Studies, analyzes and evaluates the living conditions of the population; * Develops measures to stabilize and increase the level of population's livelihood based on forming of the income policy; * In conjunction with relevant ministries and agencies prepares proposals on minimum salaries, allowances and stipends; * Submits to the Government of RT proposals on improvement of the system of allowances and compensations, as well as on protecting population's income from inflation; * In cooperation with other relevant ministries and agencies, prepares proposals to improve the system of social partnership, carries out methodical guidance of the work on concluding regional agreements, sectorial (inter-sectorial), collective agreements, facilitates settlements of collective	* Migration Service under the MLME is in charge for issuing work permits for foreign workers, as well as for regular inspection of such permissions; * It also issues licenses for companies engaged in recruitment/ employment of foreign workers in Tajikistan	High power / low influence	High interest in the project and its outcomes, particularly in terms of employment/additional work places, compliance with the labor standards

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
	labor disputes, on issues pertinent to the Ministry's competence; * Participates in preparing the draft General Agreement between the Government of the RT and Employers' Union of the RT as well as representatives of the employees, submits proposals on action plan for implementation of this Agreement; * Develops proposals on improvement of the workers' salary payment system in the frames of the tariff agreements and collective agreements; * Carries out tariff setting for works, professions and positions, develops normative basis for regulating salaries; * Endorses labor norms (standards),single tariff and qualification reference for works and professions, qualification reference book for positions, instructions, clarifications, recommendations on set up, regulation and payment of salary; * Develops and submits to the Government of the RT a list of productions, works and professions with hazardous working conditions, entitled for additional leave, reduced workday, free medical and preventive food; * Carries management of occupational safety and coordinates the work of ministries and agencies in this regard, develops inter-sectorial rules, organizational and methodical documents on occupational safety ; * Develops the list of hazardous professions where women and child labor is restricted and submits it for review to the Government of the RT, develops state statistics forms for reporting workplace accidents and incidents and professional diseases, the procedure for investigating accidents/incidents and professional diseases, norms of issuing work and foot-wear and other personal protection equipment (PPE); * Endorses the rules and norms on occupational safety, organizational, methodical and general technical requirements to implementation of occupational safety; * Carries out the work related to analyzing, implementing, evaluating professional/vocational education, including adult education.			

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
Ministry of Economic Development and Trade (MEDT)	* Participates in developing of the state policy in all the socio-economic fields of the country; * Develops short, medium and long term strategies, indicative plans and forecasts of socio-economic development and in conjunction with those, state programs on internal and external investments; * Coordinates sectorial and regional development programs; * Coordinates and controls (executive state bodies' and economic entities') implementation of commitments arising from international legal acts, acknowledged by the Republic of Tajikistan and international agreements; * Drafts proposal on concluding intergovernmental and international acts of the RT in the field of international economic relations, trade and economic and scientific and technical cooperation * Regulates prices (tariffs) subjects of natural monopolies, economic entities, having monopolistic market position on certain goods in the country.	Participates in negotiating loan agreements, regulating tariffs etc.	Low power and influence	Interest in the Project high in view of increased income and improved energy generation potential of the country
Ministry of Agriculture (MoA)	Develops and implements agricultural sector policy, facilitates international economic relations for enterprises and organizations, facilitates development of agri-industry in the country, facilitates improvement of technique, technology and processing of agricultural crops	Seen as none at this stage, may evolve depending on the Project progress	Low power and influence	Interest low, despite the impact of flooding caused by water discharge on farming areas, affecting crop production etc. May represent farmers in this regard.
Committee on Emergency Situations	* Central executive government body in charge for implementing state policy, legal and regulatory framework, providing state services in the area of disaster management and civil defense; * Implements unified state policy in the field of preparedness and protection of the population,	Seen as critical in coordinating the water discharge schedules and raising awareness/	Low power and influence	Interest in the Project impact (emergency management

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
(CES)	economic objects and country's territory from the emergency consequences; * Coordinates an array of state legal and defense and other activities aimed at protecting population and economic objects and the country's territory from the emergency consequences both natural and man-maid	preparedness when relevant among the downstream communities; Critical for coordinating the Emergency Management Plan with Nurek HPP (during the project implementation/ operation phases)		plan) is high, which became evident based on the public consultations. Close cooperation is important, probably through establishing a coordinating body for the Project (CES), ALRI, MoA, MEWR, BT/Nurek HPP, CEP
Agency on Land Reclamation and Irrigation (ALRI)	* Central executive government body in the field of land reclamation and irrigation 6 ; * Develops unified state policy, legal and regulatory environment in the field of land reclamation and irrigated lands, use and maintenance of water management infrastructure, supply and protection of water resources; * Manages irrigation and drainage infrastructure, including repair works etc.	Its irrigation and drainage infrastructure receive water after the water discharge in Nurek HPP. The Consultation in Dusti district suggest that downstream areas suffer from flooding mainly due to lack of coordination on the schedule and/or inadequate maintenance of	Low power and influence	Interest should be high, because their infrastructure will be taking water at discharge, and will be affected by the flooding too. Need coordinating

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
		irrigation and drainage infrastructure/ uncleaned canals fail taking water.		mechanism, as descried above together with CES, MEWR, BT/Nurek HPP, MoA, CEP etc.
Bilateral and multilateral agencies/ donors (ADB, BRD, IDB etc.)	ADB is one of the largest donor agencies, funding infrastructure rehabilitation, including energy sector in Tajikistan. It financed rehabilitation works on Nurek HPP (switchyard), Golovnaya HPP etc. EBRD's portfolio accounts for 42% in energy sector in the country, including rehabilitation of Qayroqqum HHP and energy loss reduction, but mainly in the Northern Tajikistan.	Interest in the project and its outcome, including its contribution to the energy loss reduction; interest is also from a perspective of the joint country partnership work.	High power and influence	Interest high
TajCnet	Network of NGOs active in the field of climate change, environment protection.	Interested in public monitoring of the project and its impact on social and environmental issues	Low power and influence	Interest high, particularly in the project outcome, including impact on climate change, downstream effect on natural reserves etc.
Institute of Water Problems, Hydropower	The Institute was established in 2002 based on the Department of Water Problems and Ecology of the Academy of Sciences of the Republic of Tajikistan and its mandate includes research in the field of water resource management, including transboundary water bodies, hydropower and ecology in existing six laboratories: (i) water resources and hydro- physical processes; (ii) Environment and	Interested in project and its outcomes, particularly in relation to the rehabilitation of the dam	Low power	High interest and potential for cooperation during project

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
Engineering and Ecology under the Academy of Science of the RT	Sustainable Development; (iii) power engineering, and resource-saving; (iv) climatology and glaciology; (v) water quality, hydro and biogeochemistry; (vi) modeling and information management.	and its safety provisions, environmental impacts on the downstream communities. Carried out research of the number of transboundary water bodies, and currently studies Amudarya/Pyanj river basin		implementation , including by involving institute in design and planning and/or implementation .
Private Sector	Private sector functions range from providing consulting services for various projects, including infrastructure/energy, design, implementation support to supply of goods and services.	Participating in the project in association with the International consulting companies and/or outsourced the public consultations and other activities, bidding for supply of goods and services, local business would benefit from increased number of foreign and local personnel during the project implementation, intensified traffic etc.	Low power	Have high interest in the project and in general positive perception of the project

Regional Level

Table 3 details all identified stakeholders at regional level.

Table 3 – Stakeholders at regional level

Stakeholder / sub-group	Relevant functions	Link with the project	Power / influence	Perception of process / impacts
Tigrovaya Balka Natural Reserve	Unique wildlife reserve protecting rare species of tugay, or riparian forest, ecosystems (flora and wild animals).	The reserve suffers from lack of water in Vakhsh river, which affects the water levels in the numerous lakes of the reserve, which are habitat for unique and protected flora and fauna. The consultation in Dusti district suggests that the reserve also is adversely affected by the (seasonal) water discharge from Nurek and Baipaza HPP endangering the unique species	Low power and influence	Interest high, need to be included as part of the coordinating mechanism to regulate the water discharge schedule and/or ensure awareness raising/proper notification on the schedule, develop mitigation measures for minimizing flooding risk
Community based natural resource management organizations, WUAs, farmers	Farmers and users of water resources located downstream Vakhsh river, who are potentially impacted by the flooding risk and water discharge/modification of water flows	Have high interest in the project impact in view of its water discharge impact causing floods. This impacts their livelihoods, which relies on agriculture mainly	Low power and influence	High interest in project and its impacts on the downstream water resource/impact management patterns. Need to be closely consulted and informed throughout the project implementation.

Local Level

Table 4details all identified stakeholders at regional level.

Table 4 – Stakeholders at local level

Stakeholder / sub-group	Relevant functions	Role in the project	Power / influence	Perception of process / impacts
Communities of Nurek (the City and two neighboring jamoats)	Local residents, including women, children, elderly, disabled, living adjacent to the only road connecting Nurek to the capital city and which will be using for transporting goods and materials during the project implementation	While the communities are also dependent on the electricity generated by the Nurek HPP, the HPP creates employment for the population; communities have range of concerns related to the project impacts, despite having a very positive attitude and perception about the project.	Low power and influence	Interest is high, for various reason, including improved power generation, positive socio-economic impacts of the Project. However, need to be intensively consulted throughout the Project lifecycle and beyond. Topic for next consultations should include topics such as traffic management plan, health and safety measures, including the data on correlation of cardiovascular diseases trend and a widespread myth on adverse impact of magnetic field generated by the Nurek HPP, job announcements/employment procedures, GRM etc.
All relevant local authorities	This includes local/city level SES, CES, Environmentalists, traffic police and City Municipality	Implementation level activities will be mainly dealt with the local level government stakeholders. It is important to involve them at the early stages of the Project to ensure efficiency and avoid possible delays	High power and influence	Interest is high in the Project and its impacts both positive and negative

Annex 2 - Stakeholders' classification

Figure 2 – Power / Interest matrix of stakeholders

High	**KEEP SATISFIED** -	**MANAGE CLOSELY** MEWR Barqi Tojik Nurek HPP CEP MHSPP/SES MLME All relevant local authorities Bilateral and multilateral agencies/ donors (ADB, EBRD, IDB etc.)
Power Low	**MONITOR (MINIMUM EFFORT)** ALRI MoA	**KEEP INFORMED** Communities of Nurek (the City and Dukoni and Puli Sangin jamoats) Community based NRM organizations, WUAs, farmers… TajCnet Tigrovaya Balka Natural Reserve CES MEDT SISPMC Academy of science (Institute of water)
	Low	**Interest** High

Annex 3 - List of stakeholders participated in consultations to discuss ESIA draft

Table 5 – Actual consultations timetable

Stakeholder	Level (location)	Number of meetings	Actual number of participants		Date of conducting
			Total	Including women	
Ministries, Agencies, State Committees etc. and national-level CSOs and NGOs, including environment-focused and forestry	National (Dushanbe)	1	16	8	08.07.2016
Khatlon Region Authorities, representatives, including women groups, farmers associations, WUAs, NGO/CSOs	Regional (Kurgan-Tyube City municipality hall)	1	38	14	21.06.2016
Jilikul, including administration of the natural reserve "Tigrovaya Balka", etc.	Regional (District community hall)	1	34	16	22.06.2016
Nurek City and Dukoni jamoat	Local (Nurek city library hall)	1	54	39	23.06.2016
Puli Sangin jamoat	Local (Community hall)	1	33	8	23.06.2016
Total		5	175	85	-

Annex 4 - Public Grievance Form (example)

Public Grievance Form			
Grievance Reference Number [to be filled in by responsible person]:			
Contact Details	Name:		
	Address:		
	Tel:		
	e-mail:		
How would you prefer to be contacted? Please tick a box	By post ☐	By phone ☐	By e-mail ☐
Name and the identification information (from identity card). *[this field is not mandatory]*			
Details of your grievance. Please describe the problems, who it happened to, when, where and how many times, as relevant			
What is your suggested resolution for the grievance, if you have one			
How have you submitted this form to the project (please tick a box)	By web site: ☐ By hand: please give this form to Community Liaison Specialist: ☐ By phone (filled by Project/PIU team specialist):: ☐		
Signature		Date	
Grievance resolution	Short description of resolution	Accepted/ Not accepted (Y/N)	Acknowledgement of Receipt of Grievance signature (if Not accepted) or "Close-out" signature (if Accepted)
1st solution			
2nd solution			
3d solution			