

**East Renewable Energy AB  
Syvash Wind Farm  
Preliminary Stakeholder Engagement Plan**



**22 May 2018**



## Contents

<b>1</b>	<b>Introduction .....</b>	<b>4</b>
<b>2</b>	<b>Project Description .....</b>	<b>6</b>
2.1	Project Benefits .....	7
<b>3</b>	<b>Roles and Responsibilities .....</b>	<b>9</b>
3.1	Contact Details .....	9
<b>4</b>	<b>Regulations and Requirements .....</b>	<b>10</b>
4.1	IFC Performance Standards and Equator Principles .....	10
4.2	EBRD Performance Requirements .....	11
<b>5</b>	<b>Identification of Stakeholders.....</b>	<b>12</b>
5.1	Government Agencies .....	12
5.1.1	Regulatory Authorities.....	12
5.1.2	Other Local and District Authorities.....	13
5.2	National and International NGOs .....	13
5.3	Local Groups operating in the community.....	13
5.4	Communities and Community Leaders .....	15
5.4.1	Vulnerable Groups .....	15
<b>6</b>	<b>Public Consultation and Disclosure Undertaken to Date.....</b>	<b>17</b>
6.1	Key Outcomes.....	22
<b>7</b>	<b>Future Stakeholder Engagement.....</b>	<b>23</b>
7.1	On-going Consultation .....	23
7.2	Disclosure.....	23
7.3	Other Engagement Activities .....	23
7.4	Methods of Communication .....	23
7.5	Community Health and Safety Management.....	24
<b>8</b>	<b>Monitoring and Reporting .....</b>	<b>32</b>
8.1	Review of the SEP during the Construction Phase .....	32
<b>9</b>	<b>Grievance Mechanism .....</b>	<b>34</b>
9.1	Overview .....	34
9.2	Examples of Grievances Typically Encountered .....	36

9.3	Community Expectations .....	37
9.4	ERE-AB Grievance Resolution Mechanism .....	38
9.4.1	Responsibilities .....	38
9.4.2	On Receiving a Grievance .....	39
9.4.3	Assessing the Grievance .....	39
9.4.4	Formulation a Response .....	40
9.4.5	Track and Monitor Grievances .....	41
9.4.6	Grievances Received to Date .....	42
<b>Appendix A Example Grievance Form.....</b>		<b>A-1</b>

## Figures

Figure 2-1: Site Location .....	6
---------------------------------	---

## Tables

Table 5-1: Local community, charitable organizations, and other organizations .....	13
Table 6-1: Consultation Activities .....	18
Table 7-1: Key CHSP Measures.....	24
Table 7-2: Future Stakeholder Engagement Programme .....	28
Table 8-1: Review of SEP during Construction Phase – Key Events .....	32
Table 9-1: Examples of Grievances.....	36
Table 9-2 Responsible Persons and Contact Details.....	39
Table 9-3: Grievances Received to Date .....	42

## Glossary

Abbreviation or Term	Definition
CHSP	Community Health and Safety Plan
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ESIA	Environmental and Social Impact Assessment
ERE-AB	East Renewable Energy AB
ESMP	Environmental and Social Management Plan
EP	Equator Principles
IFC	International Finance Corporation
NGO	Non-Governmental Organisations
SEP	Stakeholder Engagement Plan
PS	Performance Standards (IFC)
PR	Performance Requirement (EBRD)
WTG	Wind Turbine Generator

## 1 Introduction

This document is a Stakeholder Engagement Plan (SEP) developed by Wood on behalf of East Renewable Energy AB (ERE-AB), describing the key stakeholders and the information and communication plans intended in regard to Syvash Wind Farm (the Project) in Chaplynka district, Kherson region, Ukraine. The site is located along the northern shores of Lake Syvash and consists of plots leased from reserve lands of Pershokostiantynivska, Hryhorivska, Pavliska and Strohanivska village councils. The southern boundary of the south-western corner of the site lies just north of the Crimean border.

ERE-AB, will own and operate the Project.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that ERE-AB will adopt in relation to the Project. The overall approach for the SEP and the wider Environmental and Social reporting were based on the Equator Principles, IFC Performance Standards and EBRD Performance Requirements.

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goals are to ensure that adequate and timely information is provided to Project-affected people and other stakeholders, that these groups are given sufficient opportunity to voice their opinions and concerns, and that these concerns influence Project decisions.

The SEP is a “live document” and will be reviewed and updated as the Environmental and Social Impact Assessment (ESIA) progresses and Project Planning evolves. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary. The SEP should be read in conjunction with the ESIA and Environmental and Social Management Plan (ESMP) prepared for this project.

The specific objectives of the SEP are detailed below.

The methods, procedures, policies and actions undertaken by ERE-AB to inform stakeholders, in a timely manner, of the potential impacts of the Project are the key subject of this document.

A level of stakeholder engagement has already taken place as part of the requirements of the ESIA of the Project.

Communication will continue as further planning and design activities are progressed and through project implementation.

Key stakeholders have been identified in this document, however as the document is considered a 'live' document the stakeholder list will continue to be updated as the ESIA process progresses. If any stakeholders have not been identified, they should contact ERE-AB and ask to be included in future communications/engagement opportunities. Furthermore, this document describes the way that any concerns or grievances will be handled by ERE-AB.

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

This document contains the following sections:

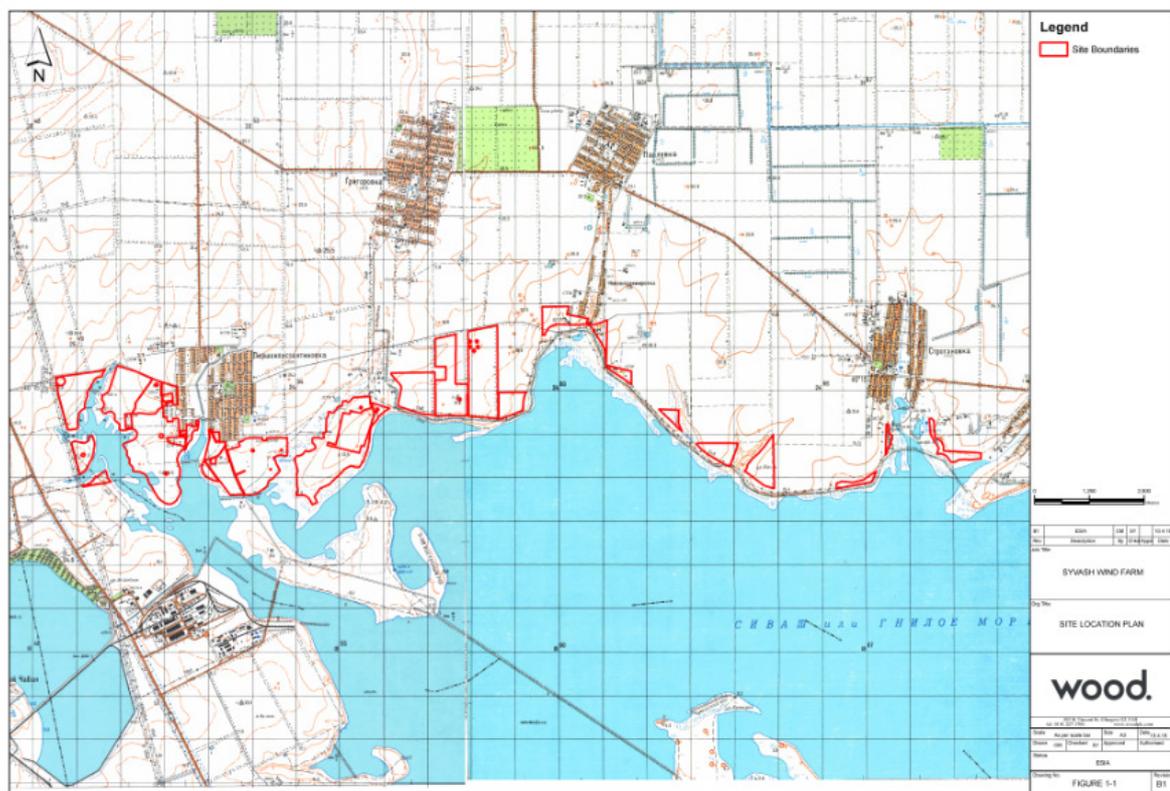
- Chapter 2 – Project description.
- Chapter 3 – Roles and responsibilities.
- Chapter 4 – Regulations and requirements.
- Chapter 5 – Identification of stakeholders.
- Chapter 6 – Public consultation and disclosure undertaken to date.
- Chapter 7 – Future stakeholder engagement.
- Chapter 8 – Monitoring and reporting.
- Chapter 9 – Grievance mechanism.

## 2 Project Description

A wind farm consisting of up to 67 wind turbine generators (WTG), each with an individual capacity of up to 4.2 MW is proposed to be constructed on land within the Chaplynka district in the Kherson region of Ukraine.

The Project is currently subject of a layout optimisation process both in terms of environmental and technical constraints. The Project ESIA therefore considered a worst-case scenario in terms of environmental impact (maximum WTG numbers, elevations and sound power level). It should be noted that the Project maximum capacity is capped at 250 MW, as per the Ukrainian EIA permit and the ESIA has assumed a worst-case scenario of up to 67 WTGs.

The location of the site is shown in Figure 2-1 below:



**Figure 2-1: Site Location**

The Project consists of land plots totalling 1,307.99 hectares leased from reserve lands of Pershokostiantynivska, Hryhorivska, Pavliska and Strohanivska village councils. The site is located along the northern shores of Lake Syvash and the southern boundary of the site lies just north of the Crimean border.

The topography of the site is generally flat. It consists of areas of cultivated land, and sections of the Project area are used by local farmers for cattle and sheep grazing. There are some localised areas of wetland, dominated by reeds. Infrastructure currently located on the site includes large irrigation drains in addition to existing WTGs establishing the presence of renewable energy in the area.

The villages of Novovolodymyrivka, Pershokostiantynivska and Strohvanivka are located immediately to the north of the proposed Project site, at distances of approximately 700 m from the nearest WTGs. These are the immediate Project Affected/Host communities. Hryhorivika village is also located approximately 2 km to the north of the Project.

The proposal is for the construction, operation, and decommissioning of a wind farm comprising the following components:

- Access road from paved highway to the Project site.
- Grid connection and substation.
- On-site access roads from the control centre to the WTGs and underground cables to carry electricity from the WTGs to the control centre sub-station.
- Construction compound.
- Control room.
- 67 WTGs.

The proposed Project will comprise up to 67 WTGs each with a capacity of up to 4.2 MW. The candidate WTG used for the purposes of the ESIA was based on the worst-case parameters. The candidate WTG with the largest tip height of 185.5 m (120 m hub height and 131 m rotor diameter) has been used for the purposes of the ESIA.

A full project description is provided in the project ESIA.

## 2.1 Project Benefits

The Project will have direct positive impacts on employment in the area, although impacts are not likely to be significant at the regional and national level. Given the low level of employment in the area, the creation of well paid, high quality jobs will be a positive outcome of the Project. However, so that local people can benefit from these new job opportunities – especially long-term operations jobs – investments in training will be required.

ERE-AB estimate that between 80 and 100 local people (i.e., from neighbouring villages) will be employed during the construction phase of the Project. Workers would include skilled (heavy equipment operators, engineers and overseers, wind experts) and unskilled (labourers, cooks, etc.). It is anticipated that the Project team will comprise a number of experienced foreign technicians and engineers however local labour will be utilised as far as possible.

Additionally, it is expected that during construction, local materials suppliers/traders for sand, cement, steel, stone aggregate and general transportation services may benefit from this project.

The Project is also expected to improve the condition of road infrastructure in the area through upgrade / construction of roads associated with the construction and operation of the wind farm.

### 3 Roles and Responsibilities

Responsibilities of parties of the Syvash Wind Farm project are presented below.

The project proponent is ERE-AB.

ERE-AB has the overall responsibility of developing, reviewing, and updating the SEP and ESMP. ERE-AB will also be responsible, as the Project Developer, IPP and EPC Manager, for day to day management and overseeing of the implementation of the SEP, ESMP and relative contract obligations of the contractors. It will also on a regular basis, monitor and audit the implementation of the SEP and ESMP. ERE-AB will provide appropriate training for their staff in relation to implementing the SEP and ESMP.

[EPC] has been appointed under an Engineer, Procure and Construct (EPC) contract to carry out the detailed project design, source plant and materials and construct the project. Given the role in the project the EPC Contractor shall have the responsibility of managing the HSE performance of the majority of the workforce.

[LENDERS] as the Lenders and Shareholders will require compliance with the respective performance standards and requirements.

#### 3.1 Contact Details

ERE-AB

[CONTACT DETAILS TBC]

## 4 Regulations and Requirements

The Project is committed to implementing all Project related stakeholder engagement activities in accordance with the IFC Performance Standards (PSs) and EBRD Performance Requirements (PRs), considered best practice for industrial developments; and with the Equator Principles (EP), which represent a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risk in project financing.

The EPs apply to all new project financings with total capital costs of USD 10 million or more across all industry sectors globally. The EPs represent a framework for project financing, which is underpinned by the revised IFC Environmental and Social Review Procedures (ESRPs) (July 2007), the revised IFC Social and Environmental Sustainability and PSs, new Sustainability Policy, and Disclosure Policy (effective 21 February 2006).

The extent to which the EPs apply to a project depends on whether the country in which the project is located is “Designated” or “Non-Designated”. Projects within Non-Designated countries such as Ukraine are required to follow the standards and guidelines as set out in the IFC PSs and Environmental Health and Safety Guidelines. In addition, the Lender requires the Project to be developed in accordance with the EBRD PRs.

The relevant aspects of these project requirement frameworks are highlighted below.

### 4.1 IFC Performance Standards and Equator Principles

Consultation and disclosure of information is a key part of the ESIA and Project development process. The consultation principles align with the relevant Equator Principles and IFC Performance Standards, with the aim to ensure all reasonable public opinions are adequately considered.

Equator Principle 5 (Consultation and Disclosure) requires the Project to undertake a process of consultation with affected communities in a manner that provides them with opportunities to express their views on Project risks, impacts, and mitigation measures, and allows the Sponsor to consider and respond to them. The consultation process should be undertaken in a manner that is inclusive, culturally appropriate, free from intimidation, timely and informed.

Equator Principle 6 (Grievance Mechanism) requires that a grievance mechanism must be developed which allows Project affected parties to raise grievances to either the Sponsor or a third party who will seek to resolve the grievance as appropriate.

IFC Performance Standard (PS) 1 (Social and Environmental Assessment and Management Systems) is the most relevant of the IFC PSs to this SEP. PS 1 structures the way in which environmental and social issues are to be handled and serves as the core around which the other PS are framed. It requires community engagement, project information disclosure, consultation and grievance mechanisms to be implemented

PS 1 states that “stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project’s environmental and social impacts. Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities”.

#### 4.2 EBRD Performance Requirements

EBRD PR1 (Assessment and Management of Environmental and Social Impacts and Issues) requires the identification of the project’s stakeholders and design of a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the project.

EBRD PR 10 (Information Disclosure and Stakeholder Engagement) requires that stakeholder engagement be conducted, on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.

## 5 Identification of Stakeholders

For the purposes of the Project, a stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the project and its potential impacts. The objective of stakeholder identification is therefore to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the project.

As a part of the development of the public consultation program for the ESIA, stakeholder identification was performed in order to determine all individuals, local communities, organizations, educational, research, and design organizations, and governmental authorities who might be potentially affected by or might affect the outcome of the proposed Project. The criteria used in the stakeholder identification process included the proximity of local residents' households to the Project site, the level of potential interest in the Project among federal and local governmental authorities, and scientists and local/international NGOs with interest or expertise.

The following stakeholder groups were defined during the identification process:

- Government agencies related to the Project approval and review.
- Non-governmental organizations (NGO's) including Professional associations and Public organizations.
- Local communities.

Stakeholder identification is an ongoing process, requiring regular review and updating of the stakeholder database as the Project proceeds.

A summary of the various stakeholder groups is provided below.

### 5.1 Government Agencies

#### 5.1.1 Regulatory Authorities

National and regional Government agencies are important stakeholders within the Project's engagement process, both as sources of information, and as those issuing the necessary permits for the Project. It is therefore important to engage with all appropriate regulators from an early stage and to maintain relationships with these agencies throughout the Project lifecycle. The following regulatory authorities were identified for consultations:

- Ukrainian Government Ministries:
  - Ministry of Energy and Coal Mining Industry.
  - Ministry of Ecology and Natural Resources.
  - Ministry of Social Policy.
  - Ministry of Economic Development and Trade.
  - Ministry of Culture.
- Kherson Oblast Rada (Regional Authority).

- Office for Cultural Affairs of the Kherson District State Administration.

### 5.1.2 Other Local and District Authorities

The Project falls within the Chaplynka District of the Kherson Region of Ukraine. The following local stakeholders were identified:

- Chaplynka Raion (District Authority).
- Village Councils.

### 5.2 National and International NGOs

Key national and international NGO stakeholders include:

- Ukrainian Wind Energy Association.
- Agency for Rational Energy Use & Ecology.
- Alliance New Energy of Ukraine.
- National Ecological Centre of Ukraine.
- Environment, People, Law (EPL).
- European-Ukrainian Energy Agency.
- NGO Working Group on Climate Change.
- Birdlife International.

### 5.3 Local Groups operating in the community

Other local community groups and charitable organizations operating within the Project area are shown in Table 5-1 below. Note that the groups identified are active across all Project areas.

**Table 5-1: Local community, charitable organizations, and other organizations**

No.	Name of Group
1.	Chaplynka district organization of the Union of Women of Ukraine
2.	Chaplynka regional organization of the Ukrainian Veterans Organization
3.	Chaplynka district organization of the Ukrainian Union of Veterans of Afghanistan
4.	Chaplynka kurin of the Kherson kosh of the Ukrainian Cossacks
5.	Chaplynka District Organization of the Ukrainian Social-Democratic Youth
6.	Chaplynka district department of the public organization “For the Prosperity of Kherson Region”
7.	Chaplynka district organization of the Union of Women Workers “For the Future of Children of Ukraine”

No.	Name of Group
8.	Chaplynka District Office of the International Public Organization “School of Equal Opportunities”
9.	Chaplynka District Office of the Public Service of Ukraine
10.	Chaplynka District Office of the League of Social Workers of Ukraine
11.	Chaplynka regional organization of the Kherson regional centre “Successful woman”
12.	Chaplynka district public organization “Chaplinsky Cossack Palanka”
13.	Chaplynka regional public organization of the Ukrainian Society of Hunters and Fishermen
14.	Chaplynka District Association of All-Ukrainian Public Organization “Ukrainian Registered Cossacks”
15.	Chaplynka district public organization “United Family”
16.	Chaplynka regional branch of All-Ukrainian public organization of invalids “Union of Chernobyl of Ukraine”
17.	Chaplynka district public organization “Clean heart”
18.	Chaplynka regional public organization “Akhyskhalilar”
19.	Public organization “Centre for the Development of Civic Initiatives” “Tavriia Region”,
20.	Chaplynka district organization of the All-Ukrainian Women's Democratic Association “Diia”
21.	Chaplynka district organization of the All-Ukrainian association “State”
22.	Chaplynka district organization of the Society for the Defence of Ukraine
23.	Chaplynka district organization of the All-Ukrainian public organization ‘Anticriminal choice”
24.	Chaplynka branch of the Public organization “Kherson Regional Association of Sanitary and Epidemiologic Workers”
25.	Chaplynka regional organization of the Red Cross Society of Ukraine
26.	Chaplynka district branch of public organization “FRONT OF CHANGES”
27.	Chaplynka district organization public organization Tavriia Agricultural Producers Association
28.	Chaplynka public organization “Turbai”

No.	Name of Group
29.	Chaplynka district party organization of the All-Ukrainian association “Svoboda” with the right of a legal entity
30.	Public organization “Children of Tavriia”

#### 5.4 Communities and Community Leaders

Chairmen and Chairwomen of local communities (Village Councils) should be engaged on a continuous basis in a discussion of all aspects of the Project that may impact on their community, lands and other assets. Meetings with these groups will follow local practices and norms and will be held prior to any wider communication in the villages in order to respect existing structures.

As per EBRD PR 10, ERE-AB will make reasonable efforts to verify that such persons do, in fact, represent the views of affected communities and that they are facilitating the communication process by communicating the information to their constituents and conveying their comments to ERE-AB, as appropriate.

The villages of Novovolodymyrivka, Pershokostiantynivska and Strohvanivka are the closest to the Project site, located at distances of approximately 700 m from the nearest WTGs. These are the immediate Project Affected/Host communities. Hryhorivika village is also located approximately 2km to the north of the Project. All of these communities are located within the Chaplynka Region.

The following residents most likely to be impacted by the Project are:

- Land-users, including farmers and others whose access to land may be disrupted by the Project.
- Households located in the zone of shadow flicker impact.
- Households located in the zone of elevated noise levels.
- Households or land users located in areas susceptible to increased dust levels.
- Households or communities located along transport route who may experience disturbance, increased noise and nuisance and health and safety impacts.

##### 5.4.1 Vulnerable Groups

Current studies show that the main economic activities around the Project area consisted of the following:

- Agrarian production, in particular the cultivation of cereals (wheat, barley), as well as rape, soybean, sunflower, tomatoes, garlic and onion. Given the scale of production, agricultural products are mainly aimed at the market of Kherson region. However, the Crimea was an important market for distribution. Annexation closed this market to local farmers.

- A large number of the inhabitants and residents of nearby villages worked at the titanium dioxide plant, which is located in the Crimea. Again, annexation has meant that such employment opportunities are no longer available.
- One of the most important local employers is the public sector, including hospitals and other state-owned enterprises.

The key barriers to economic development, include: poor road quality (roads are broken up by lorries carrying grain and damaged as a result of transportation of military equipment near the Crimea), poor quality of utility services and poor infrastructure.

Based on a review of current data the most vulnerable group identified are farmers who have had their available market for goods significantly reduced following the Annexation of Crimea. It is assessed that the Project may result in some disturbance to farming activities, either through reduced access to land or damage to existing infrastructure, therefore may cause a direct impact if unmitigated.

In addition, approximately 2% of the local population are noted as suffering from a disability and <0.5% suffering mental illness. 3% of children are reported as living in difficult conditions. However, these figures do not suggest a significant increase compared to national averages.

It is noted that women account for more than half of the community. In terms of employment opportunities, statistics from the UTC show that out of 90 employees in administration 44 persons are women, among 26 deputies 11 persons are women (they manage 4 out of 5 commissions). Many female residents have their own business although this has not currently been quantified. Nevertheless, even though these figures show the equal status of women in the local community, it is worth noting that the head of the community is male.

Further work will take place during Project development to identify any individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. This may include individuals/groups such as women/children headed households, disabled, or those with limited education etc who may be particularly susceptible to project related impacts.

Where any significantly different interests, concerns and/or priorities are identified within the stakeholder groups, due to such issues as differing ages, gender and ethnic and cultural diversity, different and/or separate forms of engagement will be investigated and implemented where necessary.

## 6 Public Consultation and Disclosure Undertaken to Date

Three meetings have been held with local communities. The primary goals of these meetings were to:

- Describe the proposed Project and ESIA process.
- Discuss and identify potential Project impacts associated with the construction and operation of the wind farm.
- Understand local land use, activities and populations living and working within or near the Project site.
- Identify the most effective ways of information dissemination in the future.
- Develop a list of stakeholders groups and local people most likely to be affected by the Project.

Details are set out in Table 6-1 below. The consultation and disclosure carried out to date will be developed further as the Project progresses into construction and operation.

**Table 6-1: Consultation Activities**

Date	Attendees	Location	Key Discussions
22 Nov 2010	<p>39 attendees registered as representatives of the communities of Hryhorivka, Pershopavlivka and Stroganivka villages;</p> <p>Representatives of the District State Administration;</p> <p>Deputies of the District Council;</p> <p>Representatives of the territorial authorities; and</p> <p>Syvashenergoprom Representatives.</p>	Hryhorivka village	<p>Discussions focussed on:</p> <p>Election of working bodies of the public hearing;</p> <p>Discussion of the town-planning substantiation of the location of the wind farm in the coastal zone of Chaplynka district of the Kherson region.</p> <p>SyvashEnergoprom presented the proposed project and discussed the proposed subsequent stages of the development.</p> <p>All participants were invited to express their opinions regarding the proposed location of the wind farm. It was noted that the opinions and suggestions of villagers would be taken into account as a matter of priority.</p> <p>Questions posed, included:</p> <p>A request for information on specific benefits for the village of Hryhorivka;</p> <p>A question regarding the use of farm lands for the construction of the wind farm.</p> <p>Minutes of the meeting include a certificate reporting: “Hryhorivka, Pershokostiantynivka, Pavlivka, Stroganivka village communities represented respectively by the Chairmen of Village Councils: S.O. Klischevskyi, T.V. Mykhailovska, A.A. Andriievskyi, S.V. Zagorodniuk; A.M. Nemchenko, Director of LLC "SyvashEnergoprom", have executed a certificate to confirm that no controversial issues have been brought to the town-planning substantiation of the location of wind farm in the coastal zone of Chaplynka district of Kherson region.”</p>
26 Nov 2017	22 attendees, including villagers	Chaplynka village	<p>Discussions focussed on:</p> <p>Election of working bodies of the public hearing; and</p> <p>Discussion of the ‘Assessments of Environmental Impact of the 250 MW Syvash WPP planned for construction on the territories of Chaplynka and near-Syvash communities’.</p> <p>Questions posed included queries regarding the potential effects of the wind farm on</p>

Date	Attendees	Location	Key Discussions
			agriculture, human health and local flora and fauna.
29 March 2018	Chairmen and Chairwomen of local communities; residents of local villages; Syvashenergoprom employees (Director and Chief of WPP); Wood Consultants	Chumatskii Viz (Restaurant) in the town of Chaplynka	<p>NBT AS Country Manager (Vladimir Kazak) introduced Wood Consultants, who in turn introduced Wood's role in the ESIA. Wood asked attendees to share their views on the proposed wind farm project.</p> <p>Positive views included:</p> <ul style="list-style-type: none"> <li>• Economic development, including employment potential in the region is needed; Project would have a national impact on move towards energy independence.</li> <li>• Green energy will help diversify the local economy, which is currently dominated by agriculture, and could be the catalyst for further investment.</li> <li>• Improvements in local infrastructure, such as roads.</li> </ul> <p>Negative views, expressed by local villagers, included:</p> <ul style="list-style-type: none"> <li>• Local farmers (e.g. in village of Pershokostyantynivka) who are currently using the project land for livestock grazing, are concerned about future availability of land for their animals.</li> <li>• Concerns regarding possible negative effects of wind turbines on climate and human health.</li> <li>• Concerns about additional land being taken by the wind farm, over and above what is already licensed.</li> </ul> <p>Director of Syvashenergoprom reported that:</p> <ul style="list-style-type: none"> <li>• The project is likely to provide employment for approximately 80 to 100 local people during the construction period. There will be training opportunities for approximately 35 individuals – a college in Chaplynka (providing electrical courses) has been identified for this. 20 people employed on the existing wind farm operation but locally there is a problem with permanent employment (seasonal work in agriculture);</li> <li>• Roads interconnecting the villages will be improved. Roads will also be</li> </ul>

Date	Attendees	Location	Key Discussions
			<p>constructed between the wind generators. Local tourism will also benefit from the project, for example, there will be easier access to Syvash lake;</p> <ul style="list-style-type: none"> <li>• There will be no restrictions to project land (for grazing) during the operation phase of the project; there will be some restrictions during construction but the construction programme will be staged and the schedule will be communicated to all affected communities.</li> <li>• No new land, over and above the existing area granted/licensed, is required.</li> </ul> <p>Wood emphasised that the ESIA process looks at all potential effects of the project on environmental and social aspects; the results of the assessment will be used to influence the design of the project and mitigation measures will be recommended to minimize any potentially negative effects.</p>
25 May 18	<p>Director of Syvashenergoprom</p> <p>Head of Chaplinskiy district administration of Kherson region</p> <p>Head, deputy head, parliamentarian and executive secretary of Chaplinskiy district council</p> <p>Syvashskaya wind farm representatives</p> <p>1<sup>st</sup> deputy Head of village council of Prisyivasckaya community</p> <p>Deputy of the Head of</p>		<p>Key discussion points</p> <ul style="list-style-type: none"> <li>• Local community - attendees provided information on historic skills development initiatives, agricultural industry, employment situation, community composition and demographics, details of public facilities, local NGOs</li> <li>• Current land use in the project area and any known environmental sensitivities</li> <li>• Awareness of the project</li> <li>• Public hearing – attendees provided a description of the hearing (everyone present was in attendance at the public hearing).</li> <li>• Local opinion of the project – it was highlighted that the majority of locals are supportive of the project however concerns were raised from one community during the public hearing. Attendees thought this stemmed from lack of understanding which has since been addressed.</li> <li>• Expectations for construction and operation of the project – discussion of perceived impacts positive and negative and expectations with regards to local content.</li> </ul>

Date	Attendees	Location	Key Discussions
	village council of territory development of Prisyvasckaya community		
26 May 18	“Maybutne Grigorivkiy” (Future of Grigorivka” (Local NGO) project managers		<p>Key discussion points</p> <ul style="list-style-type: none"> <li>• Local community</li> <li>• Current land use in the project area and any known environmental sensitivities</li> <li>• Awareness of the project</li> <li>• Local opinion of the project</li> </ul> <p>Expectations for construction and operation of the project – discussion of perceived impacts positive and negative and expectations with regards to local content.</p>
26 May 18	Chief inspector of Environmental inspection of Kherson region		<p>Key discussion points</p> <ul style="list-style-type: none"> <li>• History of the project</li> <li>• EIA, land zoning and consenting process</li> <li>• Role of the Ministry of Environment and any environmental priorities</li> <li>• Cumulative developments</li> </ul> <p>Regional waste handling facilities</p>

## 6.1 Key Outcomes

The key topics that came out of the above meetings were in relation to queries regarding how the wind farm would benefit local communities in terms of employment opportunities and upgrade of infrastructure; affect grazing land available to local livestock farmers; and how the development would affect human health.

Svashenergoprom responded by way of provision of information with regard to the proposed community benefits, for example through provision of local employment opportunities and the upgrade / construction of roads. It was also stated that there will be no restrictions to Project land (for grazing) during the operation phase of the Project but that there will be some restrictions during construction. The construction programme will be staged and the schedule will be communicated to all affected communities.

Wood emphasised that the ESIA process looks at all potential effects of the project on environmental and social aspects; the results of the assessment will be used to influence the design of the project and mitigation measures will be recommended to minimize any potentially negative effects.

## 7 Future Stakeholder Engagement

Details of the proposed future stakeholder engagement programme are presented in the following sub-sections and is summarised in Table 7-2 at the end of this section.

### 7.1 On-going Consultation

Future consultation events will be held to ensure Project information is disseminated to the community.

A Community Liaison Officer (CLO) will be appointed and will hold regular (monthly) consultation meetings, to keep local communities up to date with Project progress during construction and assist with grievance procedures, etc. The CLO will also provide training for staff responsible for implementing the SEP.

Regular consultation will be undertaken with the farming community regarding potential impacts to their livelihoods.

### 7.2 Disclosure

The full ESIA disclosure pack including the Stakeholder Engagement Plan, Non-Technical Summary, full ESIA documentation, Environmental and Social Management Plan (ESMP) and Environmental and Social Action Plan (ESAP) will be made available to the public through the internet and information boards/announcement in respective communities' buildings.

Following approval of funding for the Project, an announcement of the full decision to develop the site will be confirmed to stakeholders through press announcements, the internet (company website), local newspapers and information boards/announcement in respective communities' buildings.

Further updates to the Project after the initial Disclosure exercise will be communicated with the community by way of community meetings.

### 7.3 Other Engagement Activities

Stakeholders will be engaged throughout the implementation process for consultation, information dissemination and grievance management. There will be continuous sharing of Project information with community leaders in order for stakeholders to be informed about construction activities and progress, to minimize grievances, and to manage expectations.

### 7.4 Methods of Communication

The methods of communication to be utilised by ERE-AB will include:

- Publication for public review of the SEP, Non-technical Summary, ESMP and ESAP.

- Meetings with regulatory bodies.
- Public meetings.
- Published updates on local council website.
- Announcements in local media.
- Provision of general information on notice-boards at key public locations.
- Publication of project information including ESIA, a Non-Technical Summary, ESMP, ESAP and additional information on the ERE-AB website.
- Disclosure of monitoring reports.

## 7.5 Community Health and Safety Management

Community health and safety is a key issue that has to be managed during construction work and although not specifically part of the SEP a Community Health and Safety Plan (CHSP) will be developed describing the potential hazards of the Project during construction and commissioning to local communities and detailing how these will be controlled. The document also outlines emergency preparedness and response and sets out the grievance mechanism to ensure feedback is acknowledged and addressed appropriately. The CHSP requires that a number of measures are put in place and implemented prior to and during construction relating to community health and safety. Such mitigation measures should also be communicated to the local communities and for this reason they have been summarised in the table below alongside details of associated actions.

**Table 7-1: Key CHSP Measures**

Measure	Action
Full and comprehensive public consultation will be undertaken with the local communities to ensure that local people are aware of the construction programme and timescales, in particular highlighting timing of equipment/construction materials deliveries.	Public notifications to be communicated to local community at on-going pre-construction consultation meetings. Consultation meetings will continue throughout construction.
Signs are required to be erected around the site to inform the local community of the location of construction activities. Fencing will be placed around all excavations to prevent unauthorised access.  Signage and fencing will also be utilised to demarcate areas not accessible for agricultural purposes.	Keep Project plant and equipment to pre-defined routes and areas.  Signs will be erected along roads to inform of risk areas, construction roads and public roads, written in appropriate local language and English.  Additional road signs will be placed whenever a new road is constructed.  Consultation meetings to cover issues relating to traffic signs,

Measure	Action
	safety and potential accidents. Provide information to local communities that they should not enter the construction areas.
An emergency action plan will be required detailing the action to be taken in the event of an emergency situation, this will cater for the potential for local people to be in the vicinity of the Project site and measures for their evacuation. The local community will be made aware of evacuation procedures in the event of a fire.	Communicated to local community at monthly consultation meetings.
The local communities will be notified about the construction schedule and its progress to ensure that there is an understanding of existing site activities and activities to be undertaken in the future. Public training for safety will be carried out to avoid accidents occurring and signs erected on roads to clearly indicate the route of construction traffic.	Local communities will be made aware of the construction schedule. Traffic signs will be erected in English and an appropriate local language. The local community will also be made aware of any future changes to the schedule.
As part of pre-construction engagement activities, ensure that traffic safety and “rules of the road” are discussed with local communities. Discuss and address community concerns. Special sessions may be required for particularly vulnerable groups such as children. At minimum communicate type, frequency and traffic risks before heavy traffic begins for the construction phase. Ensure that appropriate hazard warning signage is used along roads.	Community engagement sessions to be held prior to commencement of construction activities to discuss road safety with local communities.
Measures to alert the communities of an emergency arising will be implemented. These include: <ul style="list-style-type: none"> <li>• Audible alarms;</li> <li>• Face to face communications;</li> <li>• Vehicle mounted speakers;</li> <li>• Communicating details of the nature of the emergency;</li> <li>• Communicating protection options (evacuation, restricted access).</li> </ul>	Emergency measures to be implemented.
ERE-AB will inform local communities of potentially significant hazards and summarise response plans in a culturally appropriate manner. Should plans be altered or tested, local communities will be informed of this.	To be addressed through public consultation meetings. Signs will be erected in appropriate local language and English warning of potential hazards.
Noise monitoring will be carried out to ensure noise from construction activities fall within established limits and do not negatively impact on the surrounding environment.	Construction confined to daylight hours to minimise noise disturbance. Community relations personnel will make local communities aware of any changes.

Measure	Action
<p>Provision of toolbox talks to workers to raise awareness of risks to community.</p>	<p>Local community safety will be regularly discussed during workers daily toolbox talks.</p>
<p>Population influx and increased Project waste and effluents could potentially increase pressure on local waste management services and infrastructure.</p> <p>Implement the Waste Management Plan to ensure that all waste generated by the Project (including sewage waste) is disposed of in line with Ukrainian Law and international best practices.</p>	<p>Waste Management Plan to be implemented and audited periodically.</p>
<p>An influx of construction workers could lead to the introduction and increased occurrence of communicable diseases within the workforce and the local communities.</p> <p>Ensure health screening is conducted for employees and contractors before contracting workers and on a periodic basis throughout their employment/contract.</p> <p>As part of health and safety induction for workers, provide awareness training on communicable disease prevention. Provide this training on an ongoing basis.</p> <p>Work in collaboration with an onsite medical team to ensure that such awareness and education training is appropriately provided to workers and contractors.</p> <p>Identify opportunities to support local public health campaigns that focus on prevention of communicable diseases.</p>	<p>Communicable disease awareness training to be provided as part of worker health and safety induction training, Regular, on-going training also to be provided.</p>
<p>Increased consumption of alcohol represents a risk to the health of the workforce and can cause conflict both within the workforce and in the wider communities.</p> <p>Ensure that the Zero Alcohol Tolerance Policy is enforced and monitored for workers entering and leaving the site. Design a system of penalties for anyone found with alcohol within the workers camp or on site.</p>	<p>Implement the Zero Alcohol Tolerance Policy and ensure regular monitoring of workers entering and leaving the site.</p>
<p>Increased risks to community safety and security are likely as a result of influx of workers and other individuals to the area as well as posing a threat to security, primarily in relation to their property and potential unruly or destructive behaviour. The concern is based on the perception that workers and contractors in particular, can be disruptive or may be willing to commit petty crimes, such as theft, following the consumption of alcohol.</p> <p>Potential risks to local communities may exist from both workers and other migrants attracted to the area in search of income generating opportunities.</p> <p>Ensure that Project security is aware of the Project's</p>	<p>Project Security to receive Code of Conduct training as part of their induction program.</p>

Measure	Action
<p>goals to establish good relationships with local stakeholders; the grievance mechanism for communities to voice concerns; and receives human rights and cultural sensitivity training to ensure the respect and protection of the local community.</p> <p>Develop a Code of Conduct for security personnel, which outlines appropriate conduct, engagement and appropriate use of force. Ensure all security personnel read and sign code of conduct as part of their induction program.</p> <p>Introduce head of security personnel to neighbouring communities and outline the necessary safety precautions that will need to be put in place to ensure both the safety of the Project and safety of local communities.</p> <p>Community safety meetings should be organised with all potentially affected groups and be conducted in advance of construction activities.</p>	

**Table 7-2: Future Stakeholder Engagement Programme**

Activity/Project	Project Timescales	Type of Activity to be Undertaken / Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
Consultation with local authority prior to targeted interviews with Project Affected Peoples (PAP)	By 25 May 2018	Preparation of a short project brief 1-2 pages to describe what we're doing. This will be drafted today.  Initial consultation with the local authority to obtain information on the individual PAPs and to obtain any specific guidance on key local issues to consider.	Date/location to be confirmed.	Local government.
Project flyer to be distributed to local community	End of May 2018	Short flyer showing project information and key impacts to be provided alongside the non technical summary document.	Distribution of information to local residents.	Local communities.
Additional targeted consultation with affected PAPs and local interest groups (see Table 5-1) to properly assess land-use in the project area.	By 15 June 2018	Communicate project information, identify land uses within the Project area and discuss and address any issues raised by local land users.  To include specific engagement activities targeting households affected by shadow flicker, noise, dust and transport.  Tasks to include: <ul style="list-style-type: none"> <li>• Face to face interviews planned to start the first week of June.</li> <li>• Discussion with local authority to agree relevant focus groups (green tourism for example ) and other vulnerable groups.</li> <li>• Carry out focus group discussions in early</li> </ul>	Focus Group Discussions.  Key Informant Interviews.  Locations to be confirmed.	Local communities.  Public groups

Activity/Project	Project Timescales	Type of Activity to be Undertaken / Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
		<p>June.</p> <ul style="list-style-type: none"> <li>Use the information to then update the social baseline in the ESIA and update the assessment.</li> </ul>		
Consultation to identify community priorities with respect to community benefits strategy.	Prior to construction	Provision of Project information and discussion of key issues affecting communities and groups in the Project area of influence.	On-going meetings. Date/location to be confirmed.	Advisory / non-government organisations Public groups Local communities.
Regular consultation prior to and during construction and operation, with farming community regarding potential impacts to their livelihoods.	Construction	Regular monitoring of potential impacts to the livelihoods of farming community.	Public notifications to be communicated to local community at on-going consultation meetings. Consultation meetings will continue throughout construction and operation (as appropriate).	Local farming community
Public Consultation Meeting.	Construction	Continued update on project progress during construction, including introduction and presentations on project schedules and timescales, details of construction works, operations plan, updates to the ESMP, ESAP and SEP.	On-going monthly meetings. Information board/ announcement in respective communities' buildings. Locations to be confirmed	Government (Ukrainian, regional and local) Advisory / non-government organisations Public groups Local communities
Develop measures to manage the	Construction /	Collaboration with local authorities will be	On-going meetings.	Local Government

Activity/Project	Project Timescales	Type of Activity to be Undertaken / Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
adverse effects of population influx.	Operation	required in order to jointly anticipate and develop measures to manage the adverse effects of population influx should this be identified as an issue.	Date/location TBC.	
Environment and Social Committee Meetings.	Construction / Operation	To communicate progress and environmental performance and to discuss and address any issues raised during construction, possibly extending into operation.	On-going meetings. Date/location TBC.	Local Government Public Groups Local communities
Announcement of any changes to construction programme to local residents.	Construction	Details of any future changes to proposed construction programme including proposed work on local roads and transportation programme for major components.	As required: Press announcements Internet – company website. Local newspapers/radio. Information board/announcement in respective communities' buildings. Distribution of information leaflets to local residents. Erection of signs along the transportation route.	Government (Ukrainian, regional and local) Advisory/non-government organisations Public groups Local communities
Announcement of the Project's commissioning and start-up.	Operation	Formal notification of operation of the Wind Farm.	As soon as possible after commissioning, if not before:	International Government (Ukrainian,

Activity/Project	Project Timescales	Type of Activity to be Undertaken / Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
			Internet – company website. Local newspapers/radio. Information board / announcement in respective communities' buildings. Public meeting.	regional and local) Advisory/non-government organisations Institutions (universities etc.) Public groups Local communities
Announcements on maintenance activities which may impact on local residents	Operation	May include road closures for transportation of equipment, etc.	As required: Internet – company website. Local newspapers/radio. Information board / announcement in respective communities' buildings.	Public groups Local communities
Employees	Construction / Operation	Internal meetings, employees and managers.	On-going with monthly review.	Company Management HSE Manager

## 8 Monitoring and Reporting

Through communication channels such as the presentation of announcements at local community buildings, media and periodic meetings as listed above, ERE-AB will monitor and provide feedback as appropriate.

For public consultation meetings or public exhibitions, ERE-AB will use an open book (with pens provided) for recording questions and comments anonymously. A form will be provided for people to record complaints and grievances. These will be present in an obvious area of the exhibition but in an area that will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by ERE-AB so that a response and feedback can be made to stakeholders.

The results of public consultation and project information disclosure (together with the grievance procedure) will be reported throughout the construction period as part of ERE-AB's environmental and social monitoring and reporting requirements. The reports must include attendance, purpose of meeting, and comments and decisions made.

### 8.1 Review of the SEP during the Construction Phase

Stakeholder engagement during the construction phase will relate to all activities leading up to and during the physical construction of the Project infrastructure, as well as the management of contractors and construction contracts. Engagement with stakeholders during construction is primarily about involving stakeholders in assessing whether previously identified mitigation measures are working as intended, being responsive to grievances and identifying alternatives where there are failings.

Table 8-1 lists key events during the construction phase which require reviewing and updating of the SEP.

**Table 8-1: Review of SEP during Construction Phase – Key Events**

Event	Tasks
Project design finalised and scope of construction work agreed with contractors.	<p>Identify stakeholders most likely to be affected by construction activities.</p> <p>At this stage of the Project, it will become much clearer precisely which stakeholder groups will be affected by various construction activities and when.</p> <p>Check this against prior information collected on stakeholders, as part of the ESIA for example, to ensure that all those potentially affected by pending construction have been identified and their concerns prioritized.</p>
Commencement of construction activities.	Notify local stakeholders of construction activities and changes to schedules.

Event	Tasks
	<p>For communities living near to a project site, the effects of noise, dust, vibration, traffic, and lighting associated with construction can cause disturbances and emotional stress, as well as pose a physical or health hazard. It is good practice to notify local communities of the following:</p> <ul style="list-style-type: none"> <li>• the purpose and nature of the construction activities</li> <li>• the start date and duration</li> <li>• potential impacts</li> <li>• information on whom to contact if there are concerns/complaints related to the contractor.</li> </ul>
Commencement of construction activities.	<p>Because the construction phase often carries the highest risk of potential negative impacts and therefore tends to generate the greatest volume of grievances, it is good practice for staff from both the project company and primary contractor to visit local stakeholders regularly before construction activities begin, and to be proactive about providing updates and answering questions.</p> <p>Once construction starts, try to have community liaison staff on the ground as much as possible during the process and accessible to affected communities.</p>
Commencement of construction activities	<p>The construction phase will often provide the real test of how well the grievance mechanism works. Because construction work is often fast-moving, with material and men mobilized and work rescheduled at short notice, responses to grievances need to be equally rapid and effective.</p> <p>Be prepared for a rise in the number of grievances received during this phase and ensure that adequate resources are available in order to achieve rapid response times.</p>
Third-party monitoring	<p>Communicate with affected stakeholders on how the Project is meeting its environmental and social commitments during the construction phase.</p> <p>Publicly disclose any monitoring reports generated by third-party monitors.</p>

## 9 Grievance Mechanism

### 9.1 Overview

Wood, on behalf of ERE-AB, has developed a grievance mechanism for the Project in accordance with IFC's Performance Standards and Guidance Notes which present various principles and good practice measures on grievance mechanisms. These include:

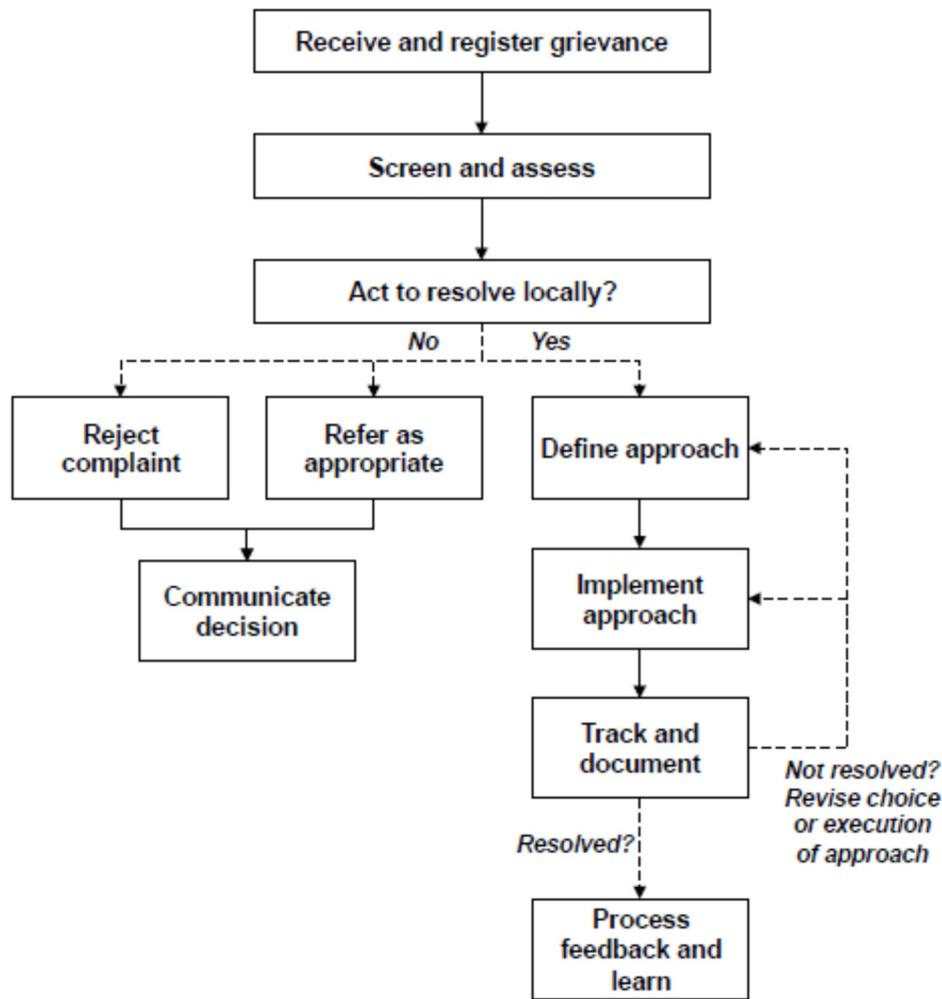
- Establish a procedure for receiving, recording or documenting and addressing complaints that is easily accessible, culturally appropriate, and understandable to affected communities.
- Inform the affected communities about the mechanism during the company/community engagement process.
- Consider when and how to seek solutions to complaints in a collaborative manner with the involvement of the affected community.
- Address concerns promptly, using an understandable and transparent process that is readily accessible to all segments of the affected communities—and at no cost and without retribution.
- Ensure full participation of both genders and vulnerable groups.
- Take into consideration customary and traditional methods of dispute resolution when designing the system.
- Assign consistent, experienced, and qualified personnel within the company with responsibility for receiving and responding to grievances.
- Establish a redress mechanism so those who feel their grievances have not been adequately addressed have recourse to an external body for reconsideration of their case.
- Document grievances received and responses provided and report back to the community periodically.
- Provide periodic reports on issues that the grievance mechanism has identified as of concern to those communities.

The Performance Standards and Guidance Notes emphasize that a grievance mechanism should help ERE-AB understand the community's perception of project risks and impacts so as to adjust its measures and actions to address the community concerns.

The Grievance Mechanism has also been designed with reference to the EBRD PRs, particularly PR 10 which requires that:

- The grievance mechanism process or procedures should address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all segments of the affected communities, at no cost and without retribution. The mechanism, process or procedure must not prevent access to judicial or administrative remedies. The client will inform the affected communities about the grievance process in the course of its community engagement activities, and report regularly to the public on its implementation, protecting the privacy of affected individuals.
- Handling of grievances should be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the stakeholders' needs and concerns. The mechanism should also allow for anonymous complaints to be raised and addressed.

The objective of ERE-AB's grievance procedure is to ensure that all comments and complaints from people directly affected by the Project, including local communities, farmers and their families are processed and considered in an appropriate way. Furthermore, the grievance mechanism should contain the corrective actions needed to be implemented in relation to complaints received with guarantees that the complainant is being informed of the outcome. The means by which stakeholders may make comments and complaints must be appropriate to their culture. The flowchart shown in Figure 9-1 below illustrates a general mechanism of processing the complaints.



**Figure 9-1: Grievance Mechanism Flowchart**

9.2 Examples of Grievances Typically Encountered

The following table provides examples of the types of grievances that are typically encountered on a major construction project such as this.

**Table 9-1: Examples of Grievances**

Type of Grievance	Complainant(s)	Example
Relatively minor and onetime problems related to company operations.	An individual or family.	A company truck damaging a community member’s fence; a one-time disrespectful encounter between a company employee and a community member.

Type of Grievance	Complainant(s)	Example
Relatively minor but repetitive problems related to company operations.	An individual or family or small group of people.	Livestock getting loose because company employees fail to close gates.
Relatively minor but repetitive and widespread problems.	Multiple individuals, families, or larger groups.	Company-related road traffic raising dust that settles on clothes hung out to dry.
Significant and larger repetitive problems.	Community groups, non-governmental or community-based organizations, or local governments.	Company blasting allegedly causing structural and/or aesthetic damage to building.
Major claims that company activities have resulted in significant adverse impacts on larger populations of people.	Community groups, non-governmental or community-based organizations, or local governments.	Company operations adversely impacting a community's water supply, making it unsafe for drinking, livestock, and/or irrigation.
Major claims over policy or procedural issues.	Non-governmental organizations, community groups or community-based organizations, or local governments.	A company's non-compliance with its own policies; failure to follow guidelines of multilateral lenders for adequate consultation to achieve prior and informed consent; inadequate resettlement and compensation of affected populations.

### 9.3 Community Expectations

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem.
- An honest response to questions about company activities.
- An apology.
- Compensation.
- Modification of the conduct that caused the grievance.
- Some other fair remedy.

In voicing their concerns, they also expect to be heard and taken seriously. Finally, ERE-AB, contractors, or government officials must convince people that they can voice grievances and work to resolve them without retaliation.

## 9.4 ERE-AB Grievance Resolution Mechanism

Local people need a trusted way to voice and resolve concerns linked to a project's operations. A locally based grievance resolution mechanism provides a promising avenue by offering a reliable structure and set of approaches where local people and the company can find effective solutions together. ERE-AB will develop and implement a grievance mechanism which:

- Increases the likelihood that small disputes can be brought to a conclusion relatively quickly before they become deep-seated grievances
- Keeps ownership of the dispute in the hands of local people
- Offers an early, efficient, and less costly way to address concerns
- Promotes a more stable business climate for companies that reduces risk and enhances accountability to the host community.

A successful grievance mechanism can help achieve the following goals:

- Open channels for effective communication
- Demonstrate that a company is concerned about community members and their well-being
- Mitigate or prevent adverse impacts on communities caused by company operations
- Improve trust and respect
- Provide structures for raising, addressing, and resolving issues that reduce imbalances in power
- Promote productive relationships
- Build community acceptance of a company's "social license" to operate.

At all times, ERE-AB will accept comments and complaints concerning the Project in both verbal and written formats. An example of a Grievance Form is provided in Appendix A.

The key aspects of ERE-AB grievance mechanism are described below:

### 9.4.1 Responsibilities

Any person or organisation may send comments and/or complaints in person or via post, email, or facsimile using the following contact information. It is anticipated that an Environmental Manager and/or Environmental Health and Safety Manager will be appointed to oversee the implementation of all project environmental and social requirements. These appointments are expected to be in place prior to the start of construction at the latest.

**Table 9-2 Responsible Persons and Contact Details**

<b>ERE-AB</b>	<b>[EPC Contractor]</b>
Andrii Nemchencho	NAME
General Manager	EHS Manager
33 Sadova Str. Hrygorievka	ADDRESS
Chaplynski district	Email:
Kherson region, Ukraine	Tel:
Email: TBC	
Tel: TBC	

In addition to the above contact details, a mailbox will be provided at the site entrance to allow local people to raise grievances in a more informal way.

#### 9.4.2 On Receiving a Grievance

The comments and complaints will be summarised and listed in a Complaints/Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.

#### 9.4.3 Assessing the Grievance

During the assessment, the team gathers information about the case and key issues and concerns and helps determine whether and how the complaint might be resolved. ERE-AB will:

- Determine who will conduct the assessment. Typically, the complaints coordinator performs this task or directs it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a company member to engage directly with the complainants to gain a first-hand understanding of the nature of the complaint.
- Clarify the parties, issues, views, and options involved:
  - Identify the parties involved.
  - Clarify issues and concerns raised by the complaint.
  - Gather views of other stakeholders, including those in the company.
  - Determine initial options that parties have considered and explore various approaches for settlement.

- Classify the complaint in terms of its seriousness (high, medium, or low). Seriousness includes the potential to impact both the company and the community.

Issues to consider include the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue. A complaint's seriousness is linked to who in the company needs to know about it and whether senior management is advised.

Rather than resorting to a purely unilateral "investigate, decide, and announce" strategy, engage more directly with the complainant in the assessment process, and involve the complainant in influencing the resolution process to be selected, and settlement options.

#### 9.4.4 Formulation a Response

The system for responding to the complainant should specify who communicates and how.

In some cases, it may be appropriate that feedback be provided by the staff member responsible for assessment accompanied by the coordinator of the complaints procedure.

The site manager may participate in feedback, depending upon the seriousness of the complaint.

When formulating a response ERE-AB will ensure that:

- The complaint coordinator or relevant department may prepare the response. The response should consider the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.
- To present and discuss the response to the complainant, consider holding a meeting with the complaint coordinator, relevant company manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator. The group would also discuss appropriate next steps during this meeting. If the proposal is a settlement offer and it is accepted, the complaint is resolved successfully and there is no need to proceed to the next step of selecting a resolution approach. If the complainant is not happy with the response about a resolution process or substance, the group should try to reach an agreement that would be mutually acceptable.
- If the case is complex and a resolution time frame cannot be met, provide an interim response—an oral or written communication—that informs the person of the delay, explains the reasons, and offers a revised date for next steps.

All comments and complaints will be responded either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

ERE-AB will respond to the complaint within one week. It is possible that some responses may take longer than one week to implement, but even in those instances ERE-AB will inform the complainant what actions will be taken and when.

#### 9.4.5 Track and Monitor Grievances

Grievances need to be tracked and monitored as they proceed through the system. Effective tracking and documentation accomplishes several goals:

- Document the severity of a complaint (high, medium, low) according to specific criteria. The level of severity guides requirements for alerting senior management and determines the seniority of management oversight needed.
- Provide assurance that a specific person is responsible for overseeing each grievance—from receipt and registration to implementation.
- Promote timely resolution.
- Inform all concerned (the complainant and appropriate company personnel) about the status of the case and progress being made toward resolution.
- Document the company's response and outcome(s) to promote fairness and consistency.
- Record stakeholders' response(s) and whether additional research or consultation is needed.
- Provide a record of settlements and helps develop standards and criteria for use in the resolution of comparable issues in the future.
- Monitor the implementation of any settlement to ensure that it is timely and comprehensive.
- Provide data needed for quality control measures, to assess the effectiveness of the process and action(s) to resolve complaints.
- Identify learning from specific cases to be used later to assess the effectiveness of the mechanism or address systemic issues that may require changes in company policies or performance.

In order to ensure that grievances are tracked and documented ERE-AB will provide the following:

- Tracking forms and procedures for gathering information from company personnel and complainant(s).
- Dedicated staff to routinely update the database of grievances.

- Periodically review information so as to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled by the company, and periodically evaluate the overall functioning of the mechanism.
- Processes for informing stakeholders about the status of a case (such as written status reports).
- Procedures for provision of regular reporting of grievances and resolutions.

#### 9.4.6 Grievances Received to Date

[TO BE REVIEWED AND UPDATED]

**Table 9-3: Grievances Received to Date**

Date	Grievance	Action Taken

**Appendix A Example Grievance Form**

I, (full name)

Resident at:

Tel:

Fax:

E-mail:

Wish to raise the following complaint or concern (include location and duration of problem):

Suggestions to solve problem:

Preferred method of communication (verbal, written, other):

Signed:

Date: