



## *Stakeholder Engagement Plan*

ESG-RPT-001-01-UZ-S-KHE01-UZ

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*Khorzem Solar 100MW / Uzbekistan*



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## APPENDICES

### APPENDIX A

#### Stakeholder mapping

## FREQUENTLY USED ACRONYMS AND ABBREVIATIONS

AC	Affected Community
AoI	Area of Influence
CLO	Community Liaison Officer
CSR	Corporate Social Responsibility
E&S	Environmental and Social
ECA	Export Credit Agency
EGM	External Grievance Mechanism
EHS	Environment Health and Safety
EIA	Environmental Impact Assessment
EP IV	Equator Principles IV
ESIA	Environmental and Social Impact Assessment
GoU	Government of Uzbekistan
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
HSE	Health, Safety and Environment
IFC	International Finance Corporation
IGM	Internal Grievance Mechanism
MFY	Community Citizen's Assembly (local known as <i>Makhalla Fuqarolar Yigini</i> )
MoE	Ministry of Energy
NGO	Non-Governmental Organization
OTL	Overhead Transmission Line
PM	Project Manager
PPP	Public-Private Partnership
PS	Performance Standard
PV	Photovoltaic
SEP	Stakeholder Engagement Plan

## 1.0 INTRODUCTION

### 1.1 Project Overview

The Khorezm Solar PV Project (the Project) consists in the development of a 100 MW solar photovoltaic power plant, and associated 3.2 km overhead transmission line, in the Tuprokkala district in the Khorezm region of Uzbekistan. This project is being implemented as part of a Public-Private Partnership (PPP) between the Government of the Republic of Uzbekistan represented by the Ministry of Energy, and FE LLC Sarimay Solar, an entity created in Uzbekistan by Voltalia S.A. for the purpose of this Project. Key Environment and Social (E&S) issues associated with solar power projects include loss of habitat, avian collision risks against the transmission line, impacts on neighboring communities including visual impacts, glare, noise and dust generation, as well as impacts related to increased water consumption, soil erosion, vibrations, waste generation and sewage generation.

WSP Italia (WSP) acts as Voltalia's Environmental and Social Consultant with the role of carrying out and preparing an environmental and social impact assessment (ESIA) of the Project.

This document represents the Project's Stakeholder Engagement Plan (SEP) and is prepared to outline the approach that will be adopted for the engagement activities throughout the Project lifecycle and outlines a systematic approach to stakeholder engagement to support developing and maintaining constructive relationships with the stakeholders and in addressing their concerns about the Project.

The SEP is a living document and will be regularly monitored, reviewed and updated by Voltalia throughout all stages of Project implementation.

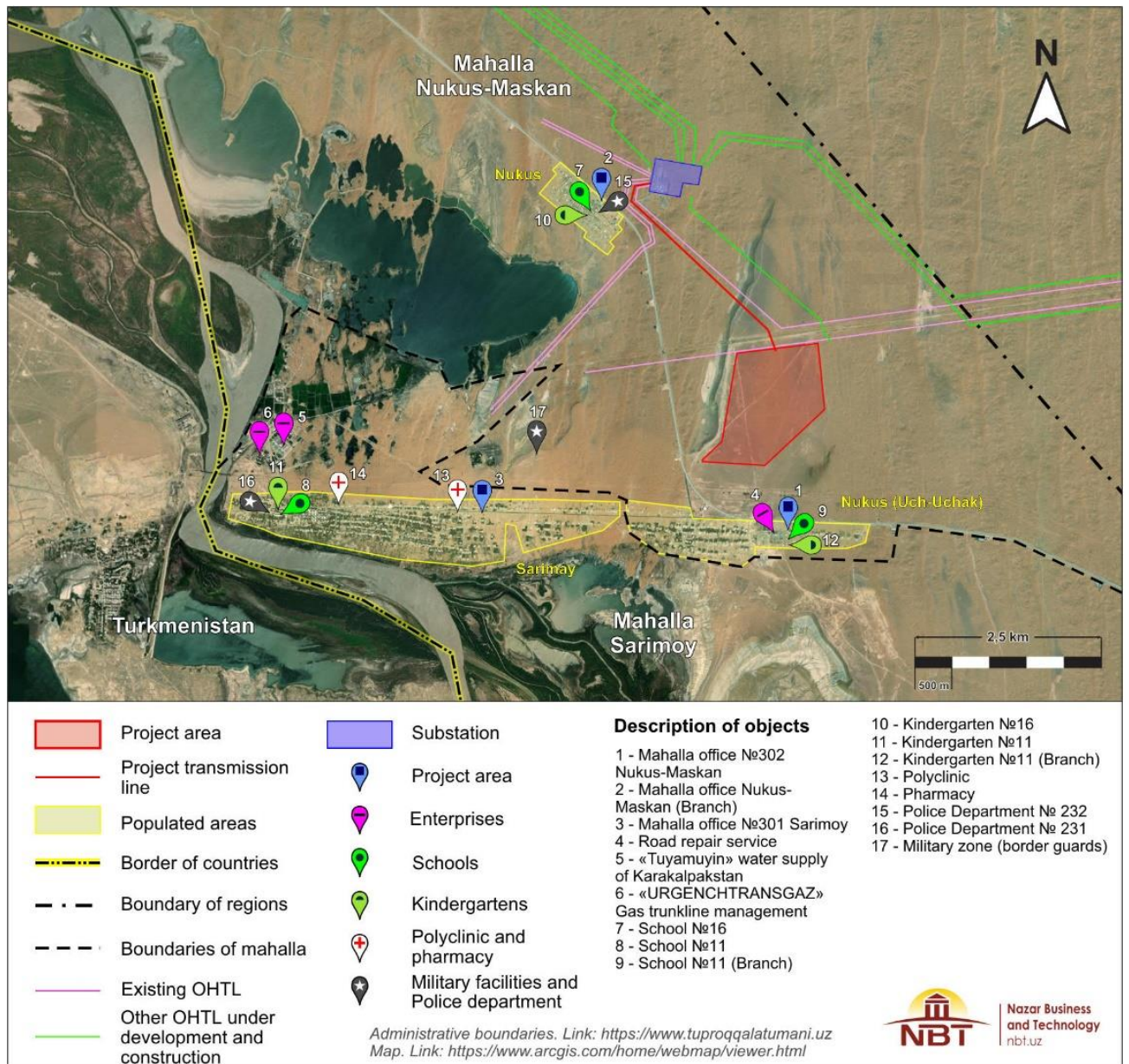
This document is organized to:

- a) describe regulatory, lender, Sponsor, and/or other requirements for consultation and disclosure;
- b) identify and prioritize key stakeholder groups, with particular attention to local communities' associations and other vulnerable groups;
- c) provide a strategy and timetable for sharing information and consulting with each of these groups;
- d) describe resources and responsibilities for implementing stakeholder engagement activities;
- e) describe how stakeholder engagement activities will be incorporated into the Project's environmental and social management system; and,
- f) describe how stakeholder engagement activities effectiveness will be monitored.

### 1.2 Project description

The Project is located in Tuprokkala District of Khorezm Province, Uzbekistan and will consist of a Solar PV Power Plant (SPP) covering a maximum area of 177 ha with a capacity of 100 MWac. The Project will connect to the existing Sarymay substation, located at about 3km northeast from the Project generation substation, via a new 3.2 km 220 kV overhead transmission line (OTL). The site is located 120km south-east of Urgench city, close to the border with Turkmenistan and near the Amu-Darya River. The site has appropriate road access. The location of the site and associated point of interconnection (Sarymay 220kV Substation) are shown below:





**Figure 1: Project location.**

The Project comprises the following:

- A 100 MW solar photovoltaic power plant (SPPP) and a step-up 35/220 kV substation. Approximately 200.000 pieces of solar panels will be installed, with an average power of 675 watts per panel.
- An associated 3.2 km overhead 220kV transmission line that will connect the SPPP to the existing Sarimay substation location north-west of the project; and
- The construction of two additional extension bays for the existing Sarimay substation to allow for the additional incoming capacity to be generated by the SPPP.

The estimated construction time of the Project will be one (1) year and the estimated total workforce required during the peak construction period is estimated to be between 200-250 workers, including technician and low-skilled personnel.

Initial activities, including site preparation, will entail several activities, which can occur simultaneously in different areas. Some examples include:

- Site works preparation and accommodation;
- Unloading/loading equipment;
- Mobilization of vehicles, workers and equipment, materials transportation;
- Vegetation clearing and land stripping;
- Earthworks (excavations, landfill, surface levelling/grading);
- Adaptation of existing roads and implementation of temporary construction roads;
- Installation of lifting cranes and warehouses for storage of delivered power equipment and building materials;
- Concrete pouring under the foundation of buildings and structures;
- Buildings and structures mounting;
- Mechanical and electrical works;
- Performance tests;
- Building of sewage septic tank and firefighting water tank; and
- Site clean-up and demobilization activities, among other.

The operation lifecycle is considered to be approximately 25 years. The workforce during operation is expected to be around 20 and will include skilled technician, security guards, and support staff.

During the operation these modules will need to be cleaned periodically depending on soiling and sand/silt accumulation. A preventative maintenance program will be established for maintenance of the inverters, mounting structures, surge arresters, cables and PV junction boxes, meteorological station, security, fencing and gates, ditches and drainage culverts as well as all sub-station components including services and septic tank. Scheduled regular maintenance will be carried out by the National Electric Grid of Uzbekistan (NEGU).

On the other hand, the Overhead Transmission Line (OTL) will be designed for continued operability (24 hours per day, 7 days per week) depending on the regime and parameters of the national and regional power transmission grid. From the beginning of the operations, the transmission line will work without the continuous presence of personnel.

### 1.3 Objectives of the SEP

The overall objective of the SEP is to define stakeholder engagement and information disclosure activities for the Project and present the specific engagement activities that will be undertaken throughout the Project's lifecycle.

Within this document stakeholders are defined as the various individuals or groups who: (i) are affected or likely to be affected (directly or indirectly) by the Project (affected parties), or (ii) may have an interest in the Project (other interested parties).

The SEP describes the way in which to engage with local communities and other stakeholder groups who may benefit from, be affected by, and/or be interested in Project activities. It also presents a grievance mechanism, through which stakeholders can raise concerns and comments.

This process encompasses a range of activities and approaches and spans the entire life of the Project (planning, construction, and operation).

SEP objectives can be summarised as follows:

- Understand the stakeholder engagement requirements of national legislation and provide guidance to structured stakeholder engagement to meet the requirements of international standards.
- Compile stakeholder maps - identification of Project stakeholders and their categorisation considering their influence on the Project and its activities.
- Identify the most effective methods of providing relevant, timely and accessible information to stakeholders in a culturally appropriate and understandable manner.
- Consult stakeholders on their opinions, concerns, preferences and perceived gains and risks with respect to Project design, construction, and operation.
- Incorporate stakeholder feedback into the impact assessment process and the development of management and mitigation measures to mitigate potential negative effects and to enhance possible benefits.
- Define internal and external reporting, as well as monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the plan based on monitoring results.
- Establish a formal grievance/resolution mechanism.
- Establish a two-way communication channel between the Project and stakeholders to communicate information, discuss and best address environmental and social impacts and issues, as well as benefits, associated with the Project.

## 1.4 Principles of Engagement

According to IFC Performance Standards (PS), a Project's stakeholder engagement process should follow the following principles:

- Begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;
- Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a local language(s) and in a culturally appropriate format understandable to Affected Communities;
- Focus inclusive engagement on those directly affected as opposed to those not directly affected;
- Be free of external manipulation, interference, coercion, or intimidation;
- Enable meaningful participation, where applicable;
- Be documented.

The present SEP has been prepared taking into consideration these principles to establish an effective and meaningful engagement process throughout the different phases of the Project's lifecycle.

In line with the requirements of IFC's PS, during engagement activities, stakeholders will be provided with the following minimum information:

- Purpose, nature, and scale of the Project;
- Duration of the proposed Project activities;
- Any risks and potential impacts with regard to the environment, worker health and safety, other social impacts on communities and the planned mitigation measures and management plans;



- The envisaged engagement process and opportunities and ways in which the public can participate and can submit their grievances.

## 1.5 Identification of the Project Area of Influence

The Project Area of Influence (Aol) that has been preliminary defined based on the anticipated environmental and social (E&S) impacts and availability of the Environmental Health and Safety (EHS) receptors broadly includes the following:

- Immediate Project site and the approaching roads, where physical disturbance of environmental and social receptors (including the neighbouring communities) might take place as a result of the presence of Project equipment and traffic movement.
- Area up to 5 km radius surrounding the Project site (depending on availability of environmental and social receptors and impacts identified) which could theoretically be affected by dust/noise, visual/landscape changes, glare, hindered access to places and indirect socio-economic impacts.

The project area is located along the main road A-380 of republican significance connecting Bukhara region with Khorezm region. The project area is located about 120 km from Urgench, the capital of Khorezm region and it is a part of Khorezm region, Tuprokkala district. Identified settlements in the area are Sarimay, Nukus maskani, Khazorasp and Tuprokkala. Sarimay and Nukus maskani communities are located within 5 km range from the project area, and Khazorasp and Tuprokkala about 10-15 km. Thus, Sarimay and Nukus maskani Makhalla Citizen's Assemblies (Mahalla Fukarolar Yigini – MFY) are regarded as project affected communities. Total population is 4,670 in both communities and 970 households. Some shops and roadside cafes are located within the project area, travelers stop here to have a quick meal and buy water or some other snacks. Some of the owners of these café and shops are not local, they are from other districts of Khorezm region (Urgench).

In about 5-6 km distance from the project location Amudarya river is located which is the border between Turkmenistan and Uzbekistan in this area.

## 1.6 Structure of the SEP

This document is organised as follows:

- Chapter 1 – Introduction and description of the Project.
- Chapter 2 – Summary of the applicable requirements.
- Chapter 3 – Project stakeholders.
- Chapter 4 – Previous stakeholder engagement.
- Chapter 5 – Stakeholder engagement strategy and method.
- Chapter 6 – Stakeholder engagement programme during Project lifecycle.
- Chapter 7 – Grievance mechanism.
- Chapter 8 – Roles and responsibilities.
- Chapter 9 – Monitoring and reporting.

## 2.0 APPLICABLE REQUIREMENTS

The stakeholder engagement for the Project will comply with Uzbekistan national legislative requirements, Voltaia corporate policy on communication and engagement, and international standards. This section details the legal, regulatory, and company requirements pertaining to stakeholder engagement. It further outlines the standards for international good practice in stakeholder engagement which have informed the development of this document.

### 2.1 National legislation

National legislation in Uzbekistan states that the public should be informed about the Project and have an opportunity to comment on the information provided. Voltaia shall report to the **Ministry of Ecology, Environmental Protection and Climate Change of the Republic of Uzbekistan** and appropriate Public Authorities about the measures taken.

Requirements to the content, development procedure and examination of Environment Impact Assessment (EIA) documents are governed by the following legislative acts of the Republic of Uzbekistan:

- Law of the Republic of Uzbekistan No 754-XII dated 09.12.1992 «On Environment Protection»
- Law of the Republic of Uzbekistan No 73-II dated 25.05.2000 «On Environmental Impact Audit»
- Regulation «On State Ecological Expertise in the Republic of Uzbekistan», approved by the Decree of the Cabinet of Ministers of the Republic of Uzbekistan No 491 dated 31.12.2001.
- “On the further improvement of the environmental impact assessment mechanism”, approved by the Resolution of the Cabinet of Ministers of Uzbekistan No. 541 (2020).
- Law on Appeals of Individuals and Legal Entities № ZRU-378 dated 03.12.2013 (new edition № ZRU-445 dated 11.09.2017, new edition last amended on 11.03.2020).

The project owner takes all reasonable measures in accordance with these laws and standards in order to minimize any potential violations of general balance of environment, including, but not limited to, land surface, subsoils, air, lakes, rivers, flora and fauna, crops and other natural resources.

Law on Appeals of Individuals and Legal Entities № ZRU-378 dated 03.12.2013 (new edition № ZRU-445 dated 11.09.2017, new edition last amended on 11.03.2020). The purpose of this Law is to regulate relations in the field of appeals of individuals and legal entities (hereinafter referred to as appeals) to state bodies and state institutions (hereinafter referred to as state bodies), as well as to their officials. Article 5 specifies the applications, suggestions and complaints as the types of appeals that can be submitted in verbal, written or electronic forms. An appeal received by a state body, organization or their official is subject to registration on the same day, and in case of receipt after the end of working hours, on the next business day. Refusal to register an appeal is not allowed. Registration of verbal appeals is not required (Article 23). Article 28 states that the application or complaint is considered within fifteen days from the date of receipt by the state body, organization or their official, and within one month in case the additional study and (or) verification is required (in the latter case the information is provided to the individual or legal entity that submitted the appeal within ten days). It was noted, that according to the law anonymous appeals are not considered (Article 29).

The national environmental impact assessment (EIA) procedure is regulated by the Law "On the Environmental Examination" and the Resolution of the Cabinet of Ministers № 541 "On further improvement of Mechanism of the Environmental Impact Assessment dated 07.09.2020 (last amendment № 774 dated 27.12.2021). The Resolution specifies the requirements for EIA process in Uzbekistan. According to the resolution, the state environmental expertise is a type of environmental examination carried out by specialized expert divisions to set up the compliance of the planned activities with the

environmental requirements and determination of the permissibility of the environmental examination implementation.

The authorized state body in the field of state environmental expertise is the [Ministry of Ecology, Environmental Protection and Climate Change](#). The SEE is carried out by the three specialized expert divisions of the Ministry:

- 1) Center for State Ecological Expertise (CSEE) of the Ministry carries out the state environmental examination of EIA of the objects of economic activity classified as the I and II categories of environmental impact (high and medium risk);
- 2) Center for State Ecological Expertise of the Republic of Karakalpakstan carries out environmental examination of EIA of the objects of economic activity classified as the III and IV categories of environmental impact (low risk and local impact);
- 3) Center for State Ecological Expertise of regions and Tashkent city - carries out environmental examination of EIA of the objects of economic activity classified as the III and IV categories of environmental impact (low risk and local impact).

The law stipulates four categories of projects as follows:

- Category I — “high risk of environmental impact” (state environmental expertise is conducted by the Ministry of Ecology, Environmental Protection and Climate Change within 20 days, all EIA materials are required);
- Category II — “medium risk of environmental impact” (state environmental expertise is conducted by the Ministry of Ecology, Environmental Protection and Climate Change within 15 days, all EIA materials are required);
- Category III — “low risk of impact” (state environmental expertise is conducted by regional branches of the Ministry of Ecology, Environmental Protection and Climate Change within 10 days, all EIA materials are required);
- Category IV – “local impact” (state environmental expertise is conducted by regional branches of the Ministry of Ecology, Environmental Protection and Climate Change within five days, only a draft EIA is required).

The types of activities of I and II categories of environmental impact are pre-project and are subject to SEE, if the project documentation is confirmed in the prescribed manner at public consultations. The procedure for holding public consultations is provided in Appendix 3 of the Resolution of the Cabinet of Ministers № 541 "On further improvement of Mechanism of the Environmental Impact Assessment dated 07.09.2020 (last amendment № 774 dated 27.12.2021). Section 24 of the Resolution on state environmental expertise outlines the information that should be within the documentation at each of these stages.

Three stages of the EIA and their required results are summarized as follows:

- **Stage I.** The draft Environmental Impact Statement (PZVOS is the national acronym) is the first stage of the environmental impact assessment process and is developed before a decision is made on the implementation of planned or planned economic activities and other activities. The draft Environmental Impact Statement shall be reviewed and approved at the national level (for projects relating to category I and II) or at the regional level (for projects relating to category III and IV) under the Ministry of Ecology, Environmental Protection and Climate Change. The state environmental expertise confirms the category of the project and identifies the main issues that the project beneficiary shall focus on in the next stages of the environmental assessment process and during the project implementation (construction or rehabilitation works).

- **Stage II.** The Environmental Impact Statement (ZVOS is the national acronym) is completed when it was identified by CSEE at Stage I and required additional investigations or analyses. The Statement must be submitted to the CSEE before approval of the project's feasibility study, and therefore before construction.
- **Stage III:** The Statement on Environmental Consequences (ZEP is the national acronym) represents the final stage in the SEE process and is to be conducted before the project is commissioned. The report describes in detail the changes in the project made as a result of the analysis of the state environmental expertise during the first two stages of the EIA process, the comments received during public consultations, the environmental standards applicable to the project, and the environmental monitoring requirements related to the project, as well as the main conclusions.

State environmental expertise approval (Conclusion issues by SCEE) is a mandatory document for project financing by local banks and other lenders (Section 18) at Stages I and II and for project commissioning at Stage III of the national EIA procedure.

The Conclusion of state environmental expertise is valid for three years from the date of its issuance. If the object is not implemented within three years from the date of issuing the Conclusion of SEE, it needs to be revised and re-submitted to the Ministry of Ecology, Environmental Protection and Climate Change for revision and approval.

The Conclusion of SEE shall be sent to the relevant regional (city) control inspections in the field of ecology and environmental protection for control. Such inspections under the Ministry of Ecology, Environmental Protection and Climate Change supervise compliance with the requirements and conditions specified in the Conclusion of SEE.

In Uzbekistan, public hearings as part of the EIA are mandatory only for the projects belonged to Category I and II. The Resolution No. 541 describes a procedure of conduction of public consultation. The minutes of public consultations have to be attached to the report on EIA. This project belongs to the category II. Therefore, it will require conduction of public consultations in accordance with national legislation as well.

Announcement of public consultation meeting with indication of date, time and venue should be done through local mass media or disseminated any other way among affected stakeholders at least 20 days in prior the event. During the public consultations at least 10 stakeholders must participate, if less than 10 participants the public consultation should re-scheduled. The project owner should present Non-Technical Summary (NTS) including the key findings of the Environmental and Social Impact Assessment for the solar park, both positive and negative.

The process of conducting public consultations must be done in 5 steps:

- **Step 1.** In at least 30 days before conducting public consultation the project owner must prepare non-technical summary and submit to the local branch of the Ministry of Ecology, Environmental Protection and Climate Change;
- **Step 2.** In 2 working days the local branch of the Ministry of Ecology, Environmental Protection and Climate Change should give decisions on the necessity of conduction of public consultation and notify relevant district Khokimiat for organization of public consultation in the project area;
- **Step 3.** District (City) Khokimiat as organizer of public consultation meeting must agree with the project owner the date, time and venue of the meeting in 1 working day and in another 2 working days inform local branch of the Ministry of Ecology, Environmental Protection and Climate Change and publish announcement on upcoming meeting on their own website.
- **Step 4.** In 20 days prior to the meeting announcements through the local media should be done, or through other communication ways local stakeholders must be informed.

- **Step 5.** In 5 working days the organizer of the public consultation meeting should send to the project owner the copy of the minute of the meeting and in 2 working days public consultation meeting details and minutes should be sent to local branch of the Ministry of Ecology, Environmental Protection and Climate Change .

## 2.2 International requirements

**International Finance Corporation (IFC)** requirements includes IFC Performance Standard 1 sets out the following requirements and guidance for stakeholder engagement:

- Stakeholder Engagement is an ongoing process that may involve, in varying degrees, [...] stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to affected communities (PS1 – paragraph 25).
- A SEP will be developed and implemented that is scaled to the project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities (PS1 – paragraph 27).
- When affected communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken in a manner 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 (PS1 - paragraph 30).
- The extent and degree of engagement should be commensurate with the project's risks and adverse impacts and concerns raised by affected communities (PS 1 - paragraph 30).
- The consultation process will be tailored to language preferences of affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups (PS1 - paragraph 30).
- For projects with potentially significant adverse impacts, the client will conduct an Informed Consultation and Participation process (PS1 - paragraph 31).
- A grievance mechanism will be established to receive and facilitate the resolution of concerns and grievances about the client's environmental and social performance from affected communities (PS1 - paragraph 34).

**The European Bank for Reconstruction and Development (EBRD)** has outlined in its Environmental and Social Policy (2019) impact mitigation requirements and the accompanying Performance Requirement (PR) 10. The Project will therefore aim to be compliant with the requirements of this policy.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2019) which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 on Information Disclosure and Stakeholder Engagement.

The EBRD's Environmental and Social Policy defines stakeholder engagement as an on-going process which involves the following elements:

- a. Stakeholder identification and analysis;
- b. Stakeholder engagement planning;
- c. Disclosure of information;



- d. Meaningful consultation and participation leading to the client's incorporating into its decision-making process the views of the affected parties on matters that affect them;
- e. An effective grievance procedure or mechanism, and
- f. Ongoing reporting to relevant stakeholders.

The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the project life. An essential element in the stakeholder engagement process, to ensure meaningful and effective consultation process, is the careful identification of all involved stakeholders and the examination of their concerns, expectations, and preferences. Special attention should be paid to the identification of vulnerable stakeholders. The engagement with these stakeholder groups needs to be planned and managed with special care. Furthermore, the EBRD requires that the project developer establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints are received, handled, and resolved effectively, in a prompt and timely manner.

## 3.0 PROJECT STAKEHOLDERS

### 3.1 Stakeholder Identification and Mapping

Comprehensive stakeholder identification is a crucial component of an effective and robust stakeholder engagement process. Accurate stakeholder identification reduces the risk of flaws in the stakeholder engagement process due to a lack of stakeholder representation. A broader stakeholder base will limit the risk for a narrow stakeholder group to dominate the consultation process.

Stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project. The stakeholder database will therefore be regularly maintained and updated to reflect the progress of Project activities.

The identification of stakeholders has been performed based on desktop and on previous engagement activities carried out during the Scoping Study for the current Project undertaken by Spanish consulting company TYPESA in June - July 2021. In addition, the outcomes of the preliminary field visit performed have been used to populate the mapping. The field visit was performed to retrieve primary baseline and to collect initial general feedback from local communities through meetings with the community leaders. The field visit was performed on 19 May 2023. The field visit allowed obtaining a better understanding of the current socio-economic conditions for the communities surrounding the Project and hence identifying stakeholders that will be directly and indirectly affected by Project activities.

At this stage, stakeholders have been identified in terms of categories that will be potentially impacted; following SEP activities preparation and implementation will allow having a further understanding of the specific stakeholders in each category. Stakeholder identification and mapping is a continuous process that will go ahead during the entire Project lifecycle, in order to have a full stakeholder mapping, which will be kept updated during the Project lifecycle. The stakeholder category identification table is provided below. An initial identification of stakeholders is provided in Table 1. The mapping is provided in **Error! Reference source not found.**, as mentioned, it will be updated throughout the progress of activities.

**Table 1: Stakeholder identification**

Stakeholder category		
I Level	II Level	III Level
Government	Republican Level	Ministry of Investments and Foreign Trade of Uzbekistan

Stakeholder category		
		Ministry of Energy
		National Power Grid of Uzbekistan
		Ministry of Ecology, Environmental Protection and Climate Change
	Regional Level	Khorezm Region Khokimiat
		The Committee for the Development of Silkworm and Karakul sheep breeding Khorezm Branch
		Navoi Mining and Metallurgical Combinat (NMMC) Pump Station
		UrganchTransGaz
	District Level	Tuprokkala District Khokimiat
		Cadastral office of Tuprokkala district
		Ministry of Ecology, Environmental Protection and Climate Change - Turpokkala District branch
		Tuprokkala Suvtaminot
		Cultural Heritage Agency Tuprokkala District Branch
CSO/NGO	Republican and Regional Level	NGO Uzbekistan Ecoforum – National level
		Uzbekistan Society for the Protection of Birds – National level
		Khorezm branch of Center of regional economic development - Regional level
		Khorezm Regional Support Center for Women and Children "Interbilim" – Regional level
		Khorezm Rural Advisory Support Service – Regional level
Media	Social Media	Local TV
		Local newspapers
		Local influential bloggers, owning news channels on telegram and Instagram.
Local communities	Sarimoy Community	Sarimoy Makhalla Administration
		Sarimoy Women's Committee
		Sarimoy leaders (respected elders, religious, women, business owners, teachers)
	Nukus maskani	Nukus maskani Administration
		Nukus maskani Women's Committee

Stakeholder category		
		Nukus maskani leaders (respected elders, religious, women, business owners, teachers)

## 3.2 Vulnerable Groups

Vulnerable Groups include those who by their inherent characteristics are expected to be disproportionately affected by the Project or are less able to manage Project impacts and therefore require special consideration throughout the consultation process. There must be a particular focus on vulnerable groups (including women and minorities), vulnerable families and individuals throughout the Project life cycle and the associated stakeholder engagement processes.

Social impacts are often experienced very differently by men and women. Rather than carry out a separate gender analysis, the aims of the stakeholder engagement in the framework of the social impact assessment will be to mainstream gender, so that is considered in all stages. In a similar manner, the issues and concerns of minorities must be identified and addressed.

A list of groups that could be vulnerable or disadvantaged in relation to the Project is presented below and is based on the outcomes of the socio-economic baseline study performed. This list will be refined throughout the stakeholder engagement activities.

- Female headed households and widows: Women who are widows and heads of households may be more vulnerable than men to Project impacts due to restricted employment opportunities and lower wages.
- People without ownership title for land and houses: could be disadvantaged with respect to compensation for any impacts due to land acquisition.
- Households with people with disabilities are generally economically more disadvantaged as the disabled member is unable to provide support for the livelihood of the household and requires additional care and attention. These households may also find it harder to reach and access health clinics during the construction phase of the Project due to road closures and diversions.
- Elderly: may have more difficulties in participating in meetings, understanding Project impacts, and coping with the induced changes.

The ESIA will define the mitigation measures necessary to avoid that vulnerable groups are disproportionately affected by Project impacts. Throughout the implementation of the SEP specific activities or measures will also be implemented, to ensure full engagement with these categories of stakeholders.

## 4.0 PREVIOUS ENGAGEMENT ACTIVITIES

### 4.1 Engagement during the scoping phase

In June – July 2021 Spanish consulting firm TYPESA, retained by IFC to provide technical, environmental, and social consulting services to support the development of the solar projects for the Government of Uzbekistan (GoU), conducted preliminary engagement activities with local stakeholders in Khorezm region and Tuprokkala district. These activities aimed at informing the stakeholders about the project, obtaining information on the sites and its surroundings, identifying potential impacts and collecting the expectations and concerns of the stakeholders regarding the project.

The consultation objectives were:

- Present the solar project, its location, its components and the role of the IFC
- Present the objectives of the screening mission
- Collect baseline information; and
- Collect their views, expectations and preoccupations about the project.

The Table 2 below outlines main engagement activities conducted up to date.

**Table 2: Previous Stakeholder Engagement Activities**

Date / Location	Stakeholder (Entity / name of contact)	Type of consultation	Main observations, recommendations and concerns expressed by the stakeholder
June 29 2021 / Regional Khokimiat	Khorezm Region Khokimiat / Khokim of Khorezm region (Mr. Farkhad Ermanov), Deputy Khokim for Investments and Foreign Trade (Mr. Shavkat Tulyaganov).	Semi structured interview	Khorezm Region Khokimiat informs that the planned PV plant site is currently under the balance of the Committee for the Development of Silkworm and Karakul sheep breeding and that these lands (295 ha) will be returned to State Reserve Lands with the agreement of the Committee and be available for the project.
June 29 2021 / Tuprokkala District	Tuprakkala District Khokimiat / Khokim of Tuprokkala District, Khorezm region (Mr. Alisher Salaev), Deputy Khokim for Investments and Foreign Trade. and Department Heads of Investment and Foreign Trade, Construction, Cadaster, district branch of Ministry of Culture, and Environment Protection Committee.		Tuprokkala District Khokimiat will support the project, providing needed information, allocation of land and other resources. District Khokimiat helped the team to identify other stakeholders related to the PV plant: settlements located within 5 km radius, and formal and informal users of the site.
June 29 2021 / Tuprokkala District	Tuprokkala District Hokimiyat / First Deputy Hokim (Mr. Otabek Abdirimov) and other representatives	Semi structured interview	After an overview of the project, the work to be done and the support needed by the administration were outlined, a site visit was carried out with the officials. The selected area for solar panel and transmission line are not on the balance sheet of the district Khokimiyat reserve land.
June 29 2021/ Tuprokkala district	Nukus maskani and Sarimay Makhalla / Sarimoy Village Assembly: Mr. Dauletmurat Didarov – Chairman; Mrs. Makhim Gaipova – Deputy Chairman on Gender and Social Issues. Nukus Maskany Makhalla Assembly: Mr. Rejep	Semi structured interview	The village representatives mentioned that the site is not of interest to locals, since it's not an irrigated stony area with very little vegetation. The area was never used by locals for cropping or for settling. Occasional grazing activities occur yearly in April-May when shepherds return to their village from the pasture sites located further and that represent better grazing opportunities. Locals collect stones from

Date / Location	Stakeholder (Entity / name of contact)	Type of consultation	Main observations, recommendations and concerns expressed by the stakeholder
	Djumaev – Chairman; Mrs. Zebo Jumaniyazova – Deputy Chairman on the Makhalla Development and Entrepreneurship.		<p>the site for the construction of barn walls and basements. However, the production of cinder blocks is less practiced. There are vast areas available for grazing and stone gathering and the impact of the project in this regard is very insignificant for the local population.</p> <p>The village representatives inquired about the potential impact of the solar project to the locals such as solar radiation, reflection of light and etc. if any.</p> <p>They will be happy with any additional job opportunities due to project implementation and operation for locals, since the unemployment is a serious issue there.</p>
June 29 and 30 2021 / Tuprokkala district	Khorezm region and Tuprokkala district branch of Ministry of Culture / Chief Specialist, Khorezm Region Ministry of Culture Branch (Mr. Sherzodbek Ibragimovich); Head of Ministry of Culture Branch in Khiva City (Mr. Alisher Hodjaev); Head of Tuprokkala District branch of Ministry of Culture (Mr. Utkir Ruzibaev)	Semi structured interview	<p>The Team members met with the regional specialists and informed them about the solar project and its location. They provided the Team with the full list of cultural heritage objects located in Khorezm Province and helped to locate the closest cultural heritage objects to the PV Plant.</p> <p>The results shown that no any cultural objects are located within 2 km of the project area.</p>
June 29 and 30 2021 / Project site	Khorezm and Tuprokkala Cadastre offices / Head of Tuprokkala District Cadaster Office (Mr. Temur Alimov).	Semi structured interview	<p>The Head of the Cadaster office in Tuprokkala district accompanied the Team during the site visit, and provided the Team with the copies of official land ownership document and full detailed map of the Gurlan massive where the PV Plant site is located.</p>
June 30 2021 / Telegram call and chatting	The Committee for the Development of Silkworm and Karakul sheep breeding, Khorezm branch / Head of the Khorezm Committee for the development of Silkworm and Karakul sheep breeding (Mr. Rashid Abdullaev); Head of the Khorezm Sheep Breeding Cluster, under the Committee (Mr. Birodar Kurbonov)..	Semi structured interview	<p>The Project Team contacted the Head of the Committee through telegram online (he was in Baku, Azerbaijan during the site visit), after introduction with the project, its location and components, they informed that they had already contacted the Khorezm Khokimiat about the land to be allocated for the PV Plant, and they have no any objections to give back 300 ha, since the allocated land is not valuable for grazing and also because vast areas are available for grazing in that area (in total 40 500 ha were transferred to them in 2020).</p>
September 29, 2021 /	Tuprokkala District Deputy Khokim (Mr. Zafarbak Matchanov)	Semi structured interview	<p>Based of requested additional meetings with local communities, the Deputy Khokim organized meetings with local</p>



Date / Location	Stakeholder (Entity / name of contact)	Type of consultation	Main observations, recommendations and concerns expressed by the stakeholder
Tuprokkala District			government of Tuprokkala District close to the project area, head of Sarimay Makhalla (head of Nukus Makhalla was not available). Also, the Deputy Khokim communicated with responsible specialists from the Uzsuvtaminot and informed them about meeting regarding the project.
September 29, 2021 / Tuprokkala District	District Branch of Uzsuvtaminot (Drinking Water Supply Organization) / Director Mr. Nasriddin Kolonadarov and Marketing Spcailist Mr. Alisher Ollaberganov)	Semi structured interview	NBT Specialist opened map of the PV site with clear boundaries, and discussed potential issues related with the PV site. Also, the Uzsuvtaminot Director informed about the construction activities of the two water reservations tanks for 1,000 m3 in total. The current water network in two makhallas is under construction and expected to be completed by September 2022. They will also construct a pump station with a treatment facility, an administrative building and a mini substation. The capacity will be enough for two villages and will improve the situation for 1,965 households. The NBT Specialist asked the Director regarding the possibility for the project to connect a pipe to the water supply. The Director mentioned two main issues in connecting the planned Solar Plant, first is that the water supply of the villages is a priority for them, and they are not sure if they can provide continued supply of the requested amount of water to the plant, the second is that to pass the main road of republican significance the project managers should contact the Ministry of Transport, and it is not easy process to get permission to block the main road. Thus, the main option for the project will be to talk to NMMC Pump Station managers to get connected to their water system, and then construct their own treatment facility and use that water. This further needs to be agreed by the relevant project specialists, MoE and NMMC managers.
September 30, 2021 / Tuprokkala District	Tuprokkala District First Deputy Khokim (Mr. Otabek Abdirimov – First Deputy of Tuprokkala Khokim and Mr. Hamdam Rahimov Head of Construction Department of Tuprokkala District)	Semi structured interview	The local Government informed that they are ready to support the Project. Also, the main recommendation they proposed was to hire workers from the local community.

Date / Location	Stakeholder (Entity name of contact)	Type of consultation	Main observations, recommendations and concerns expressed by the stakeholder
September 30, 2021 / Tuprokkala District	Navoi Mining and Metallurgical Combinat (NMMC) Pump Station Managers (Mr Farhad Yusupov Chief and Mr Sattor Dustmuradov, Engineer of the Station)	Semi structured interview	The project could be connected to the magistral pipeline. But all activities and communication will be through the Navoi Mining and Metallurgical Combinat (NMMC). Also, they informed the project that the water in the magistral pipeline is technical water with turbidity up to 25 mg/l. All other necessary information we need to request from the Navoi mining and metallurgical combine if project needs.
September 30, 2021 / Sarimay Makhalla	Sarimay Makhalla Community members (5 local residents (5 women) and head of Sarimay village)	Semi structured interview	Main concern of local residents was about the project's environmental impacts (dust, potential radiation). Due to high unemployment rate here, locals are interested with new job opportunities to be opened for them during the construction and operation phases of the project. Also, if project could help with construction a sport center and other infrastructures in the village. Overall, locals were happy to hear about the project, since every investment works bring development to this area, and they have such kind of cooperation experience due to the ADB works for A380 road.
September 30, 2021 / Sarimoy	Contractor of water reservation tanks near the Sarimay and Nukus villages (Mr Iskander Azizov)	Semi structured interview	Mr Iskander Azizov informed that they will finish all works next year. Now they work with updating the ToR because most of the area very stony and they need extra technical support.
September 30, 2021 /Tuprokkala district	Director of the National Nature Park of "Khorezm" (Mr. Atanazar Otanajanov)		The Director of the National Park's proposed coordinating all works through the Ministry of Ecology, Environmental Protection and Climate Change and National Park. He also informed the team that he will support the project. Also, he presented the National Park list of animals and plants.
May 19, 2023/ Sarimoy and Nukus Maskani	Sarimoy village Khokim's assistant (CLO of GoU to each community) – Asad komilov Sarimoy MFY Head – Didarov Daveltmurod Nukus Maskni MFY Head – Rejep Djumaev	In person meeting	Update of stakeholders on upcoming works. Collection of updated socio-economic data of both communities.

## 4.2 Engagement during the ESIA preparation

During the ESIA process, engagement activities have aimed at reaching out to a wider range of stakeholders compared to the scoping phase, and continuing engagement through the channels established during the scoping phase. The objective during the ESIA process has been to inform and update stakeholders on the progress of the Project, and to collect feedback from them useful for the assessment of impacts and the identification of mitigation measures. The main activities performed during the ESIA process have consisted in a public meeting and key informant interviews with specific stakeholders. The two activities are briefly described below.

### 1.1.1 Public meeting in June 2023

A public meeting was held on June 7<sup>th</sup> 2023. The meeting was performed to ensure compliance with Uzbekistan regulations on the EIA procedure, which requires that a public consultation is performed before the EIA procedure completed, in agreement with the local authorities; the meeting was also performed in compliance with the requirements of international standards. The meeting was held in the school no.11 of Sarimay, which is a well-known and easily accessible facility for the two settlements in the Project's Aol, Sarimay and Nukus maskani. The meeting was held in a period when teaching is interrupted for the holiday period and therefore the meeting did not interfere with the normal teaching activities. The meeting was organised in collaboration with the local authorities (District Khokimiyat). Local community members were informed about the meeting through head of makhalayas and local Khokimiyats.

Approx. 50 community members attended the meeting, including approx. 10 women. In addition, the following representatives of local authorities and institutions were present:

- Sarimay Makhalla chairman;
- Nukus maskani Makhalla chairman;
- Representatives of Tuprokkala District Khokimiyat:
- Ministry of Natural Resources. Department of Ecology, Tuprokkala district representative of the inspection department.

The meeting was held by NBT and by Vitalia staff; the language of the meeting was Uzbek, foreign Vitalia staff was supported through translation. Project information was provided to participants, through a presentation (provided in APPENDIX 7.1 "Public meeting presentation"), which described the project main features, its location, the overall schedule, the ESIA process and a preliminary indication of the expected impacts. Information was also provided on the grievance mechanism and the channels to get in touch with the proponent. The presentation was followed by a question and answer session open to all participants.

During the meeting participants did not raise specific concerns on the Project and on its potential impacts during the construction and operation phase. The general feeling is therefore that the Project seemed to be well received by participants. Main questions posed by participants had to do with employment opportunities generated by the Project and possible benefits for the local communities. Participants were interested to know how many employment opportunities would be generated during the construction phase, whether priority during employment would be given to local community members and whether training activities for local community members are planned.

Minutes of the meeting were taken by NBT staff and participants were invited to sign an attendance register. Following the meeting, an official form which includes the minutes and the attendance register was prepared by NBT in compliance with Uzbek regulation and submitted to the Ministry of Ecology and Khokiyat of Tuprokkala District. This form is provided in APPENDIX 7.2 "Public meeting log for national authorities".

News on the meeting was provided by the Tuprokkala District through the public telegram channel that many members of the local communities are subscribed to.

Pictures of the meeting are provided below.



**Figure 2: Pictures of the public meeting held in Sarimay on June 7th 2023.**

#### **4.2.2 Key informant interviews**

A series of key informant interviews have been performed during the ESIA process. The aim of these activities has been to collect primary information useful to prepare the socio-economic baseline study of the ESIA report. The interviews were performed using open ended questions and asking interviewees to provide the relevant data needed and discussing with each the topics of their field of work or expertise. Informants to be interviewed were selected to ensure the collection of information at local level or on

specific topics necessary to describe the socio-economic profile of the affected communities. These interviews also represented an opportunity of engagement, as participants were informed on the Project and its progress, and were invited to provide their feedback.

The table below provides the list of key informant interviews performed and the issues discussed.

**Table 3: List of key informant interviews performed during the ESIA preparation**

Date / Location	Stakeholder (Entity / name of contact)	
<b>May 19, 2023/ Sarimay and Nukus Maskani</b>	Sarimay village Khokim's assistant (CLO of GoU to each community) – Asad Komilov  Sarimay MFY Head – Didarov Daveltmurod  Nukus Maskni MFY Head – Rejep Djumaev	The meeting was held to inform the local authorities about the start of the ESIA process and to discuss the organisational aspects for the performance of the public meeting.
<b>June 7, 2023 Local community Nukus maskani</b>	The first deputy of the Khokim of Tuproqkala district (Mr.Gayrat Madiyarov)	During the meeting, the project team informed them about the project, its location, and the stages of construction. Issues related to land allotment, the activity of the water pipeline located along the project area, and the purge gas line located close to the project area were also discussed. After the meeting, the Deputy Khokim of Toprakkala district promised to make every effort to support the project, provide the necessary information, and allocate land and other resources.
<b>June 8, 2023 Local community Nukus maskani</b>	Local communities chairmen (Chairman of Nukus maskani LC Mr. Rajep Jumaev and Chairman of Sarimay LC Mr.Dauletmurat Didarov )	During the meeting, the project team informed them about the project, its location and objectives. The following aspects were consulted as: livelihoods and natural resource use, land tenure and use, use of the project area, health, education, housing, access to the site and transport, water, sanitation and energy, vulnerable groups and gender relations. Potential impacts on their activities, livelihoods and basic facilities were discussed, as well as possible mitigation measures. In addition, the project team gathered their views, expectations and concerns about the project.  The village representatives noted that the site is not of interest to local residents as it is a non-irrigated rocky area with very little vegetation. The area has never been used by the locals for crop cultivation or settlement.  They would welcome any additional employment opportunities through the



Date / Location	Stakeholder (Entity / name of contact)	
		implementation and operation of the project for local residents, as unemployment is a serious problem here.
<b>June 8, 2023</b> <b>Local community</b> <b>Nukus maskani</b>	Deputy of the local medical center - Mr. Ismoil Jumanazarov	The meeting took place on June 8, 2023 with the deputy chief physician of the Local Medical Center. During the consultation, the NBT specialist informed about the plans and activities of the project. In addition, there were questions about the activities of the center and about common diseases on the area.

#### 4.2.3 Public meeting in November 2023

A second meeting with the communities was carried out by in Sarimay Local School no.11 in the morning November 9<sup>th</sup>, 2023.

Participation had almost doubled from the last engagement performed, reaching a total of around 80 participants from the communities alone, with 40% presence seen to be female, and 60%, male. The members of the community presented diverse ages, although there were fewer younger participants.

Participation in the meeting was as follows:

- **Voltalia Team:**
  - Kelly Cluterbeck, Development Director
  - Carole Pontais, Development Manager Uzbekistan
  - Margaux Houdayer, E&S Regional Officer
  - Oybek Amanov, HSE Coordinator
  - Zukhra Sharipova, Social Advisor
- **French Embassy in Uzbekistan**
  - Clotilde Brogniart
  - Jan Roscvielle
- **EBRD**
  - Louis Collet, Environmental Specialist
- **WSP**
  - Cecilia Maitland Heriot, Project Manager, ESIA
- **Nazar Business and Technology**
  - Sergey Kim, Head of EHS Department

#### ■ Local Representation

- The newly elected Governor for the Khorzem region;
- The Sarimay makhalla (Rajep Jumaev) and the Nukus maskani makhalla (Dauletmurat Didarov);
- The School Director and most members of the school staff;
- Members of the Community.

During this meeting, the community members were welcomed and then were provided updated in terms of the advancement of the Project by Votalia. Repetition of information shared in the previous consultation was avoided to avoid stakeholder exhaustion. The newly elected Governor also re-enforced his support for the project and highlighted the importance of Projects of this type in the area.

The members of the community were then given the opportunity to elevate questions. All the questions asked related to the possibility and or probability to find work opportunities in the Project.

Some stakeholder frustration was perceived, as the members of the community shared that other projects had been developed in the area, for which they had been promised jobs, but that never came through. The community expectation around labour opportunities was perceived as a critical point. A careful management of these expectations will be required to avoid stakeholder disappointment / frustration.

Pictures of the meeting are provided below.





**Figure 3: Pictures of the public meeting held in Sarimay on November 9<sup>th</sup> 2023.**

During this occasion, WSP and EBRD had the chance to perform a smaller and private meeting with both of the Mahallas, and the School Director to ask about the project impressions, the expected impacts, any concerns, any lessons learned from previous projects in the area, any grievances observed as a consequence of other projects in the area and workers influx, etc. No grievances, criticalities or worries were presented or expressed by them in relation to Community Health and Safety, Environmental, Livelihood, or Displacement aspects. Their main concern was again in relation to the labour opportunities related to the project. The Mahallas expressed that community members had been presenting themselves to their office on a daily frequency to ask about labour opportunities related to this Project. They then mentioned that they had started to prepare a list of candidates interested in job opportunities, but then gave up this effort upon the realization that it would have encompassed the majority of the town members, including females and the younger generation.

## 5.0 ENGAGEMENT STRATEGY AND TECHNIQUES

In order to carry out an efficient stakeholder engagement process with stakeholders of all levels, the Project may use an array of techniques, presented in the table 3 below. These techniques are among the most common used in engagement processes, with different objectives and targets. An indication of the effectiveness of the technique in the local context is provided. The specific engagement activities that are planned to be performed for the Project have been selected from the table below and are described for the different Project phases in chapter 0.

**Table 4: Stakeholder engagement techniques**

Engagement Technique	Objectives	Effectiveness of the technique in the local context
Information Boards	<p>Provide Project information in the community administration offices of both Sarimoy and Nukus maskani, as well as along the main road. Information provided in the boards will include:</p> <p>General details in relation to the Project, including updates throughout the various phases;</p> <p>Deviation routes and traffic management during construction;</p> <p>The Grievance Mechanism and contacts;</p> <p>Other relevant information deemed to be useful for stakeholders.</p> <p>Additional information boards to inform the population of specific activities will be placed on an as-needed basis.</p>	High
Project website	<p>Present Project information and progress updates.</p> <p>Disclose standalone supplementary ESIA documents.</p> <p>Provide instruction and contacts details to get in touch with Vitalia.</p> <p>Provide the grievance submission form.</p>	Medium
Radio, newspapers, and other media	<p>Disseminate Project information to large audiences also beyond the Project area.</p> <p>Inform stakeholders about consultation and public meetings.</p> <p>Inform stakeholders about Project updates.</p>	Medium
Public meetings	<p>Present and distribute Project information to a large audience of stakeholders.</p> <p>Allow the group of stakeholders to provide their views and opinions.</p> <p>Build relationships with communities.</p>	High
One-to-One meetings	<p>Seek views and opinions from specific stakeholders.</p> <p>Enable stakeholders to speak freely about sensitive issues.</p> <p>Build a personal relationship.</p> <p>Ensure the participation of vulnerable groups.</p> <p>Discuss mitigation measures with specific stakeholders that will be more affected.</p> <p>Address grievances raised by stakeholders.</p>	High
Focus Group Discussions and Key Informant Interviews	<p>Allow smaller groups to provide their views, opinions and targeted information.</p> <p>Build relationships with communities.</p> <p>Use a focus group interview guideline to facilitate discussions.</p> <p>Record responses and opinions of stakeholders.</p>	Medium



Engagement Technique	Objectives	Effectiveness of the technique in the local context
Informal meetings with stakeholders in the Project Area	Share information on Project schedule and plan of Project Day to day activities. Continuously keep stakeholders informed on the progress of activities.	High
GM boxes	Install GRM boxes in both communities for collection grievances and concerns, including anonymous.	Medium

## 6.0 ENGAGEMENT PROGRAMME DURING THE PROJECT LIFECYCLE

A number of engagement activities will be performed throughout the Project lifecycle to ensure that stakeholders have a good understanding of the Project activities that will be carried out, of the impacts expected on the channels available to contact Vitalia. Engagement will also represent an opportunity for stakeholders to raise comments and questions that the project owner will take into consideration in the Project implementation.

Engagement activities will be generally performed in Uzbek, which is widely spoken and understood in the project area. Written communication materials maybe prepared in Uzbek and Russian languages. Vitalia will ensure that staff used for engagement activities speaks Uzbek and other local languages.

All engagement activities performed will have to be registered using a register and form further described in chapter 0.

The program provided below is to be considered indicative as changes to the activities and to the stakeholders involved may be made as the Project goes ahead, based on the outcomes of previous activities and the relationship established with the different stakeholder groups. Changes to the program should be defined and agreed between the Community Liaison Office (CLO) and management (the full description of the roles and responsibilities for the implementation of this plan is provided in section 0 of this document).

### 6.1 Engagement during the ESIA disclosure

Stakeholder engagement activities during the ESIA disclosure phase will build on the outcomes and lessons learned of activities performed during the ESIA preparation phase. The following program is therefore intended as indicative and will be further updated. Public Consultation meeting should be conducted as described in the Section 2.1 according to Decree of the Cabinet of Ministers of the Republic of Uzbekistan №541. This will be further defined based on the outcomes of the previous public meetings performed.

**Table 5: Proposed Stakeholder Engagement Program during the ESIA disclosure**

Stakeholder	Engagement technique	Objective	Location and frequency	Responsible party
Sarimay and Nukus maskani Community	Disclosure of Non-Technical Summary to Village Chiefs	Provide the Non-Technical Summary to makhalla chairmen and inform local communities of the availability of the document	Sarimay and Nukus maskani MFY offices	Vitalia



Stakeholder	Engagement technique	Objective	Location and frequency	Responsible party
administration staff			Once during the disclosure phase	
Local community living within the Project's Area of Influence.	Posters and brochures	Present updated Project information and schedule of activities. Present Project impacts Present ESIA report and mitigation measures identified. Present grievance mechanism. Provide contact details. Provide indications to access the Non-Technical Summary.	Sarimay and Nukus maskani MFY offices and along the road Once during ESIA disclosure.	District Khokimiat and Voltaia
Local community living within the Project's Area of Influence. Local, national and international NGOs	Website	Publish ESIA report and all documents prepared during the ESIA process	On Project website during ESIA disclosure.	Voltaia
All interested stakeholders	Public Consultation meeting in accordance with national regulation	Present updated Project information and schedule of activities. Present Project impacts Present ESIA report and mitigation measures identified. Present grievance mechanism. Provide contact details. Provide indications to access the Non-Technical Summary.	Sarimay village, once before the project implementation.	District Khokimiat and Voltaia.

## 6.2 Engagement during the construction phase

Stakeholder engagement activities during the construction phase will build on the outcomes and lessons learned of activities performed during previous phases. The following program is therefore intended as indicative and will be further updated.

**Table 6: Proposed Stakeholder Engagement Program during the construction phase**

Stakeholder	Engagement technique	Objective	Location and frequency	Responsible party
Sarimay and Nukus maskani residents	Information boards	Provide general information on the project in terms	Public boards in the villages and at the	Voltaia

Stakeholder	Engagement technique	Objective	Location and frequency	Responsible party
		Provide contact details for the grievance mechanism	construction site entrance.	
Sarimay and Nukus maskani residents	Public meetings with potentially impacted population	Present updated Project information and schedule of construction activities. Present Project staff during construction. Sensitization on environmental, social and security issues Seek views and opinions.	Sarimay school #11 At least once at the beginning of the construction phase.	Volitalia
Local organizations and interested individuals Local, national and international NGOs	Website	Provide periodic news and updated documents.	On Project website during construction phase.	Volitalia
Local authorities, schools and religious leaders	One-to-one meetings	Present updated Project information and schedule of construction activities. Present Project staff during construction. Seek views and opinions.	Pitnak town (adm.center of Tuprokkala district) and Sarimay village On an as needed basis.	Volitalia
Contractors' and subcontractors'	One-to-one meetings and training and sensitization session	Present updated Project information and schedule of construction activities. Inform about the project Environmental Management Plan	During induction training.	Volitalia

### 6.3 Engagement during the operation phase

The responsibility for performing engagement activities during the operation phase will under Volitalia and they will be responsible for the engagement during this phase of the Project. The following program is therefore intended as indicative and will be further updated.

**Table 7: Proposed Stakeholder Engagement Program during the Project operation phase**

Stakeholder	Engagement method	Objective	Location and frequency	Responsible party
Sarimay and Nukus maskani residents	Public meeting.	Discuss issues or problems emerged during the initial operation phase. Find agreed solutions to the problems emerged.	Sarimay village Bi-annually after Project inauguration.	Volitalia

Stakeholder	Engagement method	Objective	Location and frequency	Responsible party
Sarimay and Nukus maskani MFY Heads and Sarimay and Nukus Maskani Khokim's assistants (GoU CLOs)	Meetings with stakeholders in the Project Area.	Discuss issues or problems emerged during the initial operation phase. Find agreed solutions to the problems emerged. Discuss CSR projects which the Company may support	Sarimay and Nukus maskani, at least once in a month CLO should visit each MFY	Voltalia
Local authorities, schools and religious leaders	One-to-one meetings	Present updated Project information and schedule of construction activities. Present Project staff during construction. Seek views and opinions.	Pitnak town (adm.center of Tuprokkala district) and Sarimay village on an as needed basis.	Voltalia

## 7.0 GRIEVANCE MECHANISM

The Project's external grievance mechanism (EGM) applies to the Project's design, construction, operation and maintenance activities. It includes the grievance procedures for processing external grievances filed by any Affected Person (AP), Affected Community (AC) and stakeholder that wishes to file complaints/grievances or raise concerns, claims or suggestions regarding the Project activities or on the Project's footprint (within and beyond the Social Area of Influence (Aol)<sup>1</sup> and allow for their timely resolution.

This EGM procedure is fully aligned with this Plan and ensures that all the relevant and interested stakeholders, the ACs/APs as well as any marginalized, disadvantaged or vulnerable groups can access this service [**Vitalia Grievance Management Tool**]. It provides a framework for receiving, recording, facilitating and resolving any grievances raised by any individual or group through the submission of an official grievance form (distributed to all local shops and petrol stations), e-mail, letter, SMS or the website, which will be duly retrieved, processed and resolved within the agreed timeframe.

The EGM is compliant with the international lender's requirements (the IFC Good Practice Note on Addressing Grievances from Project Affected Communities, 2009 and IFC's CAO Advisory Note: A Guide to Designing and Implementing Grievance Mechanisms for Development Projects) the GM should be established immediately after the Project becomes effective and implemented at the earliest stage, which should be well before the Project initiation stage according to Good International Industry Practices (GIIP).

The EGM is compliant with the national legislation of Uzbekistan, which include the following:

- Law "On appeals of individuals and legal entities" (Resolution of the Cabinet of Ministers No. 445, 2017).
- Law on introducing amendments and additions to the Law of the Republic of Uzbekistan "Queries of Citizens and Legal Entities" (No. 445, from Sept. 11, 2017)
- Measures for Further Strengthening Work with Citizens' Problems (No. 5633, from January 17, 2019)
- Measures to Improve the Status of Mahallas in Work Related to Citizens' Problems (No. 5700, from April 2, 2019)
- Additional Measures to Ensure the Rule of the Constitution and Law, Strengthening Public Control and Increasing Legal Culture in Society (No. 4551, from December 13, 2019)
- Law of the Republic of Uzbekistan "On Personal Data" of July 2, 2019 No. ZRU-547 (entered into force on October 1, 2019) and related amendments (2021)

Grievances/Complaints will be received through the following channels:

- Grievance box: In order to allow anonymous grievances, sufficient grievance boxes shall be installed throughout the Project Site including all access points, workers camp or workers lodging premises, if applicable, and related facilities. The location of the grievance boxes shall be discrete and away from all surveillance cameras.
- E-mail: Email addresses for Vitalia grievance management staff will be outlined on the information boards (sarimay@vitalia.com)
- Mailing Address (Letter): Shahrizabz street, block 5A 100060, Mirabad District, Tashkent
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<sup>1</sup> According to the ESIA, the Social Aol is an area with a radius of 5 km that includes all the social receptors.

- In-person submission: directly at the Social Advisor's office
- SMS: to the dedicated GM of Sarimay solar park: +998933161631;
- Phone number: to the dedicated EGM of Sarimay solar park: +998933161631;
- Company's website: The EGM will be published on the Sarimay Solar website ([www.Sarimaysolar.com](http://www.Sarimaysolar.com)) before financial close;
- Verbally: This shall be done to the Social Advisor or corresponding contractor/subcontractors.

The Project Management Team shall be responsible for publishing and distributing the grievance mechanism within the Aol, including communicating the grievance mechanism to APs/ACs and other interested stakeholders, and ensuring the EGM is operational and effective throughout the Project lifecycle. APs/ACs will be made aware of the EGM including the Internal Grievance Mechanism (IGM)<sup>2</sup> they can follow to seek redress, including, if necessary, resort to administrative or judicial procedures as well as Lenders' grievance mechanisms.

The EGM<sup>3</sup> procedures, grievance forms and grievance boxes shall be presented to the communities living within the Aol and the relevant stakeholders during the public consultations, FGDs, and KIIs in order to raise awareness and promote the Project's grievance procedures. The Company's representative(s) including the Social Advisor shall assure participants in the public consultation that grievances/complaints on any aspect or issues are encouraged, and any issues raised will be addressed with a high degree of care and confidentiality in a timely and satisfactory manner. Participants and the general public should be informed about other external grievance mechanisms available to them such as Lenders' grievance mechanisms, the *Mahallas'* grievance mechanisms including other available public administrative and judicial procedures.

The following EGM materials shall be present and promoted in public and private establishments (where permitted) within the Project area and made accessible to APs/ACs and the relevant/interested stakeholders:

- External Grievance Mechanism posters that include instructions on how to fill out grievance forms and the timeframe for processing grievances, including the location of the grievance boxes within the Project area; and,
- Information on how to access Grievance Forms (indication of the physical locations and how to access them online from the website).

Information shared with the stakeholders includes the following:

- General principles of the EGM;
- **What** benefits complainants can receive from the EGM;
- **When**, where, and how Project stakeholders can file complaints/grievances;
- **Who** is responsible for receiving and responding to complaints/grievances; and,
- The nature of the response the stakeholders can expect, including timing.

The Company shall ensure that the general information about the EGM procedures and forms, including instructions on how to file grievances and the timeframe for processing grievances are available in all the

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<sup>2</sup> An IGM will be used to process grievances from Project personnel including EPC Contractor/Subcontractors' personnel. The APs/Acs shall be aware of both the IGM and EGM, which will be used throughout the Project lifecycle.

<sup>3</sup> The EGM (Community Grievance Mechanism) was presented to the Project's stakeholders during public consultations performed during the ESIA process, in June 2023 and November 2023.



local languages, easily accessible and legible by all interested stakeholders. The EGM posters shall be advertised on public billboards, local notice boards or communication streams, available at site entry points, published on the Company's website ([www.sarimaysolar.com](http://www.sarimaysolar.com)) and local Telegram Messenger channels.

The grievance management process is provided in the EGM procedure, which will be presented to the APs/Acs and all relevant stakeholders during all planned engagement activities.

All information relative to grievances will be managed confidentially within Votalia by using suitable storage methods and will be accessible only to the responsible persons indicated in section 0. Information may be made accessible to other responsible persons within Votalia, in specific cases and only if necessary for the resolution of the grievance. Information will not be shared with external parties, including contractors and subcontractors, unless required according to Uzbekistan regulation. Information on grievances shared externally for reporting purposes (see section 0) will be provided in anonymous form and will not allow identifying the individuals or groups accessing the EGM.

## 8.0 ROLES AND RESPONSIBILITIES

In this section, the organisational structure and management functions within Votalia responsible for the stakeholder engagement activities are described:

- Project Manager (PM) is responsible for overseeing and coordinating all activities associated with stakeholder engagement. The PM is responsible for the following activities:
  - Ensure that all stakeholder engagement aspects are a permanent item on all high-level management agendas, and that all actions arising from management decisions are implemented in regard to the stakeholder participation;
  - Determine necessary resources for effective implementation of this SEP;
  - Attend stakeholder meetings with technical team members and ensure feedback of stakeholder responses and requests to technical teams are responded to within agreed timescales.
  - Follow-up on any grievances and non-Conformities, non-compliance or deviation from the requirements of this Plan.
- Social Advisor is responsible for supporting the implementation of the EGM. The Social advisor is responsible for the following activities:
  - Receive, log and process the complaints/grievances;
  - Contact the Complainant in case further clarification is required;
  - Explain to the Complainant the process and timelines for the remaining steps in the procedure and inform on how the complaint will be handled.
  - Ensure confidentiality of the Complainant from the lodging of a grievance onwards and inform the Complainant that the grievance can also be lodged anonymously should the complainant prefer it.
  - Liaise with the Complainant from the moment the grievance is retrieved (reception) until grievance close-out.
  - Ensure that the complaint/grievance is clearly defined/verified and fully understood without any ambiguity;

- Communicate/Verify with the Complainant based on the preferred method of communication as specified by the complaint in the grievance form.
- Update this information into the grievance form and send to the Complainant through an agreed method (e.g., email, fax or similar) for the Complainant to sign and send back. All additions will be explained verbally to the Complainant in this case as well.
- Complete this examination and investigation
- Identify the root cause of the grievance, investigate if the grievance is correct or not, identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable).
- In case of high sensitivity grievances, the Social Advisor shall hold the power to escalate
- Ensure all project personnel, including EPC Contractor/Subcontractors, are trained on the contents of this procedure;
- Ensure the community and project-affected stakeholders are made fully aware of the contents of this procedure, including the process for submitting a grievance;
- Prepare and file all grievance forms;
- Mediate in all grievances received by the site through proper channels;
- Provide all information necessary according to this procedure whenever there is a grievance;
- Ensure easy, fast and conclusive resolution of grievances; and,
- If grievance is unresolved, the Receptor shall be responsible for helping Complainant identify other avenue to file the grievance externally.
- Social Site Supervisor is responsible for overseeing and coordinating all activities associated with stakeholder engagement. The PM is responsible for the following activities:
  - Oversee and implement this Plan;
  - Ensure the social components of the Project are compliant with this Plan, permit requirements, local legislation, and Lenders' requirements;
  - Ensure that stakeholder engagement during construction is in line with Lender's requirements and national regulations.
  - Supervise and manage the work of the Community Liaison Officer and ensure the correct implementation of the stakeholder engagement plan and grievance mechanism;
  - Address grievances through the EGM/IGM procedures and ensure corrective action as per the mechanism;
  - Liaise with local authorities regarding community issues and refer this back to Project Owner, Project Manager, Environmental Site Supervisor and Social Site Supervisor;
  - Ensure that all stakeholder engagement aspects are a permanent item on all high-level management agendas, and that all actions arising from management decisions are implemented in regard to the stakeholder participation;
  - Determine necessary resources for effective implementation of this SEP;

- Attend stakeholder meetings with technical team members and ensure feedback of stakeholder responses and requests to technical teams are responded to within agreed timescales.
- Follow-up on any grievances and non-Conformities, non-compliance or deviation from the requirements of this Plan.
- Community Liaison Officer (CLO) is responsible for implementing engagement activities; this assignment plays a critical role as an internal agent for social and stakeholder related matters in Votalia's organisation. The CLO will be on site on a daily basis during construction. If possible, the CLO should be a member of the local community, to ensure easier communication and relations with stakeholders. The responsibilities of the CLO include the following:
  - Develop, implement and monitor all stakeholder engagement activities included in this Plan.
  - Liaise with communities and stakeholders to ensure their overall engagement in line with indications in this Plan.
  - Organise and participate in all engagement activities performed.
  - Regularly update the SEP in collaboration with the PM and management.
  - Regularly update the stakeholder mapping and other databases used within the context of the engagement process.
  - Provide briefings and support to technical teams for meetings with stakeholders.
  - Implement and coordinate the grievance mechanism and oversee its practical day to day running.
  - Prepare periodical reports in line with indications of Chapter 0.

The roles and responsibilities outlined above can be adapted to the organizational structure of Votalia, notwithstanding that all the tasks indicated are properly assigned to a responsible person. The operation of the Project will fall under the responsibility of the Votalia. All staff appointed for stakeholder engagement activities will have to be qualified for the tasks they are undertaking. If necessary, staff will be provided with appropriate training to ensure they are fit for the job.

The E&S consultant provides support to Votalia in the initial phases of engagement. The E&S consultant prepares the first version of the SEP and is responsible for directly performing or supporting Votalia in performing engagement activities during the ESIA process, as indicated in section **Error! Reference source not found..** At the end of the ESIA process, the E&S consultant will prepare an updated version of the SEP which will include main outcomes of engagement activities performed during this phase.

Other contractors and subcontractors will not be allowed to run or organize engagement activities autonomously. In addition, workers of contractors and subcontractors will not be allowed to collect grievances from individuals or groups but will instead have to redirect them to the official submission channel; workers will have to be properly informed on this aspect during induction training. Contractors and subcontractors may however be involved by Votalia in specific engagement activities on an as needed basis and in the implementation of resolution measures within the grievance mechanism.

## 9.0 MONITORING AND REPORTING

### 9.1 Process Record Keeping

It is vital to keep meticulous records of the stakeholder engagement activities and associated communications throughout the lifecycle of the Project. Solid record keeping not only provides a robust reflection of the process followed, but also serves as an indicator of the stakeholder engagement process compliance with the required regulatory framework, policies, and principles.

Voltalia will be responsible for keeping track through a specific database of all activities performed within the framework of stakeholder engagement. The record keeping process will include the following aspects:

- Stakeholder identification and mapping, periodically updated;
- Stakeholder engagement activities register, with an indication for each activity performed, including the and location, participants, information disclosed and outcomes of the activity. If agreed by stakeholders, pictures of each activity should be taken and appropriately stored;
- Copies of all the communication material distributed to stakeholders;
- Periodical reports prepared;
- Previous SEP versions.

### 9.2 Monitoring activities

The SEP will be periodically reviewed by Voltalia and updated, as necessary. A continuous monitoring of the implementation of the corporate SEP will be performed throughout the Project's lifecycle to verify the effectiveness of the activities performed and to identify changes necessary to the program of activities, to the engagement methods used and to the roles and responsibilities. This SEP will be monitored through environmental and social auditing/supervision activities undertaken by a responsible entity. An indicative list of auditing and supervision activities shall include:

- The correct implementation of this SEP;
- The compliance to the frequency and to the planned schedule of activities indicated in the SEP;
- Timely and effective reporting.

The internal audit shall also examine:

- Review of stakeholder engagement activities register to ensure that record is filled correctly;
- Review of stakeholder mapping to ensure that the list is continuously updated;
- Review of periodic reports to ensure that they are compiled correctly.

### 9.3 In addition, the EGM will be subject to internal monitoring as indicated in the relative document. Internal Reporting

The CLO will be responsible for liaising with Voltalia management on a regular and on an as-needed basis, to inform the general progress of the Plan's implementation and obtain advice when needed.

Votalia will prepare a report on a six-monthly basis and once at the end of construction activities. Reports will contain the following information:

- Overall data on number and typology of activities performed;
- Attendance and feedback from stakeholders;
- Problems and critical issues emerged;
- Status of grievance mechanism performance and critical issues emerged;
- Corrective actions taken within the Plan and schedule;
- Decisions to be taken in consultation with management.

Reports will be shared with Votalia management and with any other party deemed necessary. These reports are considered to be a tool to periodically inform internal stakeholders on progress of activities as well as a tool to assist in making relevant decisions. If critical issues on engagement emerge during the implementation of the Plan and requires an immediate resolution, the CLO will consult with the management to agree on the appropriate actions. This will then be documented in the periodic internal report.

## 9.4 External Reporting

To continue a close relationship with the external stakeholders, it is recommended that the Votalia prepares dedicated reports to keep them informed on the Project activities. The following information will be reported in a suitable format:

- Outcomes of environmental monitoring activities;
- Outcomes of stakeholder engagement activities, with an outline of initiatives carried out and main issues that emerged;
- Information and data on grievances (in anonymous form);
- Data on local employment and local procurement (if available); and
- Any other relevant information to the external stakeholders.

The report will be prepared once per year during the Project construction phase and once at the end of the construction phase; frequency of reporting during the operation phase will be determined by Votalia based on the outcomes of the previous engagements and reporting activities performed. The report will be made available to stakeholders on the Project website, upon request and during engagement activities.