

Georgian State Electrosystem (GSE)



STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

The Construction of Akhaltsikhe - Batumi 220kv Double Circuit Power Transmission Line



Date: August 1, 2019

Table of Contents

Acronyms	4
1. Introduction / Project Description	5
1.1 Introduction	5
1.2 Project Overview	5
1.2.1 Type of project and location	5
1.2.2 Summary of potential environmental and social impacts	7
1.3 Purpose and objectives of SEP	7
2. Regulations and requirements	8
2.1 Georgian Requirements	8
2.1.1 Constitution of Georgia	8
2.1.2 Public Consultation in the EIA Process	8
2.2 World Bank Requirements.....	9
3. Brief summary of previous stakeholder engagement activities	9
3.1 Project-affected parties (PAPs)	13
3.1.1 People affected by land acquisition	13
3.1.2 People residing in the project areas	13
3.1.3 Municipality and village representatives	13
3.2 Other interested parties (OIPs)	14
3.2.1 Other interested parties – External	14
3.2.2 Other interested parties – Internal.....	15
3.3 Disadvantaged / Vulnerable individuals or groups.....	15
3.4 Summary of stakeholder interest in and influence over the project	15
4. Stakeholder engagement program	16
4.1 Planned stakeholder engagement activities	16
4.2 Detail on engagement methods to be used	20
4.2.1 Public/community meetings	20
4.2.2 Mass/social media communication	20
4.2.3 Communication materials.....	20
4.2.4 Grievance redress mechanism	20
4.2.5 Project tours for media, local representatives.....	20
4.2.6 Information Desks	20
4.2.7 Citizen/PAP perception survey.....	21
4.2.8 Trainings, workshops	21
4.3 Proposed strategy to incorporate the view of vulnerable groups.....	21
4.4 Information disclosure.....	21
5. Roles, Responsibilities and Resources for Stakeholder Engagement	22
5.1 Implementation Arrangements.....	22
5.2 Roles and Responsibilities.....	22
5.3 Estimated Budget	23
6. Grievance redress mechanism	25
6.1 Grievance Process.....	25
6.1.1 Receipt of Grievances.....	26
6.1.2 Screening for ‘Standing’	26

6.1.3	Grievance Resolution Committee (Stage 1)	27
6.1.4	Grievance Resolution at Central Level (Stage 2)	28
6.1.5	GSE Grievance Redress Commission (Stage 3)	28
6.1.6	Closure of Grievances	29
6.1.7	Grievance Records and Documentation	29
6.2	Workers' Grievance Mechanism	29
6.3	GSE Contact Information	30
7.	<i>Monitoring and Reporting</i>	32
7.1	Monitoring reports during construction	32
7.1.1	Quarterly and Annual Reports by GSE	33
7.1.2	Six Monthly E&S Compliance Reports to the World Bank	33
7.2	Monitoring reports during operation	33
7.2.1	Annual Reports by GSE	33
7.2.2	Six Monthly E&S Compliance Reports to the World Bank	33
7.3	Involvement of stakeholders in monitoring activities	34
7.4	Reporting back to stakeholder groups	34
8.	<i>References</i>	35

Acronyms

Acronym	-	Description
AH	-	Affected Household
CLO	-	Community Liaison Officer
E&S	-	Environmental & Social
EMF	-	Electro-Magnetic Field
ESF	-	Environmental and Social Framework
ESIA	-	Environmental and Social Impact Assessment
ESS	-	Environmental and Social Standard
GRC	-	Grievance Resolution Committee
GRM	-	Grievance Redress Mechanism
GSE	-	Georgian State Electrosystem
IDP	-	Internally Displaced People
KfW	-	Kreditanstalt für Wiederaufbau
KV	-	Kilovolt
NGO	-	Non-Governmental Organization
OHL	-	Overhead Transmission Line
OIP	-	Other Interested Parties
PAP	-	Project-Affected Parties
RAP	-	Resettlement Action Plan
SEP	-	Stakeholder Engagement Plan
WB	-	World Bank

1. Introduction / Project Description

1.1 Introduction

This report presents the Stakeholder Engagement Plan (SEP) which has been prepared and will be implemented by Georgian State Electrosystem JSC (GSE), in preparation for the Energy Supply Reliability Project (Project), which includes the construction and operation of approximately 148 -kilometer 220 kiloVolt (KV) overhead transmission line (OHL) between Akhaltsikhe and Batumi. (“the Project”).

The Government of Georgia (Georgian State Electrosystem), would like to strengthen the national power transmission system and the grid access for South Western Georgia by constructing a 220 kV double circuit transmission line connecting the substations in Akhaltsikhe and Batumi. The new transmission line will ensure more stable electricity supply in the region, reducing outages and enable GSE to meet the growing demand for electricity, as well as enhance export opportunities. The new transmission line will also allow the hydropower projects on the Adjaristskali River, the 178 MW Shuakhevi HPP and the 150 MW Koromkheti HPP, developed by Adjaristsqali Georgia LLC (AGL) to be connected to the grid.

Work on strengthening the transmission network in the Caucasus began in the 1980s. The proposed 220kV line, that is the subject of this ESIA, was originally designed as part of a larger plan to connect the electricity systems of the all three South Caucasus countries, and to improve reliability of the Georgian power system. Planning and design of the section from Akhaltsikhe to Batumi started in 80- ies aiming to eliminate the Batumi “dead-end” through connecting it to Akhaltsikhe and making system grid more effective and reliable. However, after 1992 the construction became impossible due to political events in Georgia, and these plans have been postponed. The project that was planned at that time is now proposed to be completed and extended by adding two new Adjaristskali HPPs (Shuakhevi and Koromkheti). The proposed project would extend Georgia’s system according to Georgia’s power sector development plan, enhancing export opportunities to Turkey through the new Akhaltsikhe substation, connected to the Turkish grid at Borchka using a 400 kV overheadline.

The planned activities include the construction of the 220 kV overhead power transmission line (OHL) Akhaltsikhe - Batumi to strengthen/improve entire Georgia power transmission system, to meet the growing demand for electricity, to connect the hydropower plants at Shuakhevi and Koromkheti to the Georgian grid and to enhance export opportunities.

The 220 kV overhead transmission line will start from existing Akhaltsikhe 500/400kV Back to Back substation and will connect to existing Batumi 220kV substation. The total length of the line is approximately 150 km and shall be a double-circuit line with ACSR conductors and an OPGW. The proposed OHL will be connected with substations at Shuakhevi and Koromkheti hydropower plants which are currently under construction and possibly connected to Beshumi ski resort substation after its modification.

The activities envisaged by the project include right-of-way acquisition, land clearing, arrangement of access roads to the poles/towers where required, construction of foundations and towers, stringing – installation of conductors, insulators, other equipment. All activities related to construction and operation phases are described in details in subsections below.

The main permitting authority in Georgia, issuing construction permits, is the Ministry of Economy and Sustainable Development of Georgia (MoESD). The GSE as project developer is planning to apply for the Construction Permit in May-June 2019, after the public consultations are undertaken in accordance to the requirements of Georgian legislation and the World Bank. This ESIA Report will be a part of the GSE application package and will be passed by MoESD to the Ministry of Environment and Natural Resources Protection of Georgia (MoEP) to conduct Ecological Examination based on experts’ conclusions and the outcomes of public participation process. Special separate permit should be obtained for the RoW clearing in forested areas from the National Forestry Agency (of MoEP). All the above procedures are described in details in Section 2 “Legal and Regulatory Framework” of this report.

1.2 Project Overview

1.2.1 Type of project and location

Various features/sections of the project are located in each of the following municipalities: Akhaltsikhe, Adigeni, Khulo, Shuakhevi, Keda, Khelvachauri, Batumi. The final design is based on the outcomes of the routing study, geo-technical

and cadastral surveys, towers spotting and the present ESIA. The construction cost is estimated to be around 36 million USD. The map below illustrates the intended route from Akhaltsikhe through Shuakhevi and down to Batumi.

The Routing Study has been undertaken in 2012-2013 to identify a preferred corridor for the construction of a proposed 220 kV overhead line connecting Akhaltsikhe and Batumi substations. The main considerations during the selection of route corridor were: the ease with which the route can be accessed for construction and maintenance; the constructability of the line taking into account the topography; environmental constraints; and ground conditions, including areas prone to landslides. Special attention was given to Social sphere in order to minimize the impacts on local population, agricultural land visual and cultural heritage impacts.

Map 1: Area impacted by the project



The proposed corridor uses an existing line (called the 110 kV ‘Adigeni-Beshumi’) for approximately 11km of the route (east of Beshumi). Tower spotting work has been undertaken following the topography survey/walkover and in collaboration with the constraints mapping. The selected corridor largely avoids built up areas, thus minimizing the need for land acquisition and resettlement. The line route itself has been chosen to avoid settlements and their associated infrastructure as well as tourist areas.

The OHL project covers two regions of Georgia: Samtskhe-Javakheti Region which is in the south-east Georgia and Adjara Region in the south-west part of the country. Major part of the OHL will be comprised on Adjara territory.

The Samtskhe-Javakheti Region comprises six municipalities including Adigeni, Akhaltsikhe, Akhalkalaki, Aspindza, Borjomi and Ninotsminda, of which the project corridor crosses only Akhaltsikhe and Adigeni Municipalities.

Adjara Region (the autonomous republic) comprises the municipalities of Khulo, Keda, Kobuleti, Khelvachauri and Shuakhevi, and self-governing city of Batumi. The proposed transmission line will cross all municipalities of Adjara

1.2.2 Summary of potential environmental and social impacts

Potential environmental and social impacts of the project, as identified in the ESIA (WEG, 2019), which may need to be paid particular attention to as part of the stakeholder engagement activities, include:

1. effects on land uses, people and property, geological features and characteristics of soils, fauna and flora, hydrology, uses of the water environment, acoustic environment (noise or vibration) air quality have been described and where appropriate quantified;
2. effects on locations or features of cultural importance are described;
3. effects on landscapes, on views and viewpoints are described and partially illustrated;
4. effects on demography, social and socio-economic conditions in the area are described;
5. effects on human health and welfare are described and where appropriate quantified (e.g. health risks arising from major hazards associated with the Project, changes in living conditions, effects on vulnerable groups).

1.3 Purpose and objectives of SEP

The purpose of the present Stakeholder Engagement Plan is to explain how Stakeholder Engagement will be practiced throughout the course of the project and which methods will be used as part of the process; as well as to outline the responsibilities of GSE and contractors in the implementation of Stakeholder Engagement activities.

Indeed, while the project is not expected to cause any physical resettlement, and only limited permanent land acquisition, the involvement of the local population is essential to the success of the project, to ensure smooth collaboration between project staff and local communities and minimize and mitigate environmental and social risks related to the project.

2. Regulations and requirements

2.1 Georgian Requirements

2.1.1 Constitution of Georgia

“The Constitution of Georgia was adopted in 1995 and while the constitution does not directly address environmental matters, it does lay down the legal framework that guarantees environmental protection and public access to information with regard to environmental conditions” (SLR Consulting, 2018: 5).

Article 37, Part 3 states that *“any person has the right to live in a healthy environment, use the natural and cultural environment. Any person is obliged to take care of the natural and cultural environment.”* Article 37, Part 5 states that *“an individual has the right to obtain full, unbiased and timely information regarding his working and living environment.”*

Article 41, Part 1 states that *“a citizen of Georgia is entitled to access information on such citizen as well as official documents available in State Institutions provided it does not contain confidential information of state, professional or commercial importance, in accordance with the applicable legal rules.”*

2.1.2 Public Consultation in the EIA Process

“In April 2000, Georgia ratified the Aarhus convention. This UNECE (United Nations Economic Commission for Europe) convention facilitates and regulates information availability, public involvement in decision making and access to justice for the field of environmental protection. It implements the principle of the need for involvement of all interested parties in order to enable environmentally responsible development.

The Georgian legislation requires public consultation only for those projects which require Environmental Impact Assessment. These requirements were recently updated and are set out in the Code of Environmental Assessment (2017). This provides detailed requirements and procedures for conducting public consultations and established timeframes for information disclosure and discussion. The responsibility for the public disclosure now rests with the Ministry of Environment Protection and Agriculture (MEPA), such that the following is required:

- The Scoping Report – a preliminary document prepared by the developer, which sets out the type of information to be gathered and examined during EIA, is made available by the Ministry on its official website as well as on the notice board of the relevant local authorities and/or representative bodies and upon request, provides hard or soft copies. The public has a right to provide its opinions and comments regarding the Scoping Report to the Ministry within fifteen days of publication. In addition, the Ministry is required to organize a public hearing no earlier than 10th working day and no later than 15th working day after the publication of scoping application. This is chaired and protocolled by the representative of the Ministry and is held in the closest appropriate administrative building to the site of the project or within its vicinity. Any person has a right to participate in it.
- The EIA Report - the Ministry must place the submitted application and attached documents on its official website as well as on the notice board of the relevant local authorities and/or representative bodies and upon request, provide paper copies. The public has a right to submit their opinions and comments to the Ministry regarding the EIA Report, proposed development and conditions of the Environmental Decision, within forty days after the publication of the application. In addition, the Ministry is required to organize a public hearing no earlier than 25th working day and no later than 30th working day after the publication of the application. This is chaired and protocolled by the representative of the Ministry and is held in the closest appropriate administrative building to the site of the project or within its vicinity. Any person has a right to participate in it.

- Environmental Decision - the public must be informed about the decision and be able to access it. Any representative of the public has the right to appeal the decision if it is considered that the public authority in the decision-making process violated the requirements of the legislation” (SLR Consulting, 2018: 5).

2.2 World Bank Requirements

The World Bank’s Environmental and Social Framework (ESF)’s Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice” (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- “Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

3. Brief summary of previous stakeholder engagement activities

Public hearing of environmental impact assessment of the project on the construction and operation of Akhaltsikhe-Batumi 220 kV power transmission line was carried out in Akhaltsikhe, Adigeni, Khulo, Keda and Khelvachauri municipalities on 8-10 July 2014 for the fulfillment of the requirements of the Law of Georgia on Environmental Impact Permit. The authorities of the municipalities, local population, NGO’s and other interested parties took part in the meetings organized for the public hearing of the EIA. The minutes of the public hearing meetings were prepared, which reflected the views and comments regarding the project and the EIA report expressed by the stakeholders, including the local authorities and the population, and responds of the EIA consultant ("DG Consulting") and representatives of the GSE to their questions and comments.

Information on public hearing of the EIA report was published in the newspaper "24 Hours" and "Samkhretis Karibche" on May 19, 2014, as well as in the newspaper "Adjara" on May 20, 2014 (Statement published in the press is given in Annex 7 of Volume II of the EIA report). In addition, the relevant statement was published in administrative building of the Municipality. In accordance with the rules established by the Georgian legislation, interested parties had opportunity to express their opinions on the EIA report within 45 days after the publication of the statement.

Consultation Measures Implemented at the Scoping Stage and during the EIA Process within the 2015 EIA Framework

In 2019, in the framework of the new EIA process, several consultative meetings were held with the population and stakeholders:

- On January 21-23, 2019, public hearing of the scoping report with the local population and stakeholders was held in 5 villages of Akhaltsikhe, Adigeni, Shuakhevi and Khulo municipalities under the guidance of the Ministry of Environment Protection and Agriculture of Georgia.
- On February 21-24, 2019, the EIA team representatives held a preliminarily planned meeting in the villages of Akhaltsikhe, Adigeni, Shuakhevi and Khulo municipalities that are located near the project territory, and the population was provided with comprehensive information on the project Related impacts.

EIA public hearings and initial informal meetings

As already noted, the project area covers the territories of seven municipalities of two regions of Georgia.

On February 21-24 of the current year, representatives of Ltd "Eco Spectri" held pre-planned working meetings in these municipalities, as a result of which comprehensive information was delivered to stakeholders.

In particular, on February, meeting was held with representatives of the Akhaltsikhe Municipality, namely with the Vice-Mayor of Akhaltsikhe Mr. Guram Melikidze and the Acting Head of Infrastructure and Spatial Arrangement of Akhaltsikhe Municipality, Mr. Shota Merabishvili. (Picture 1).

The meeting was also held with representatives of local NGOs, in particular the meeting was held with the "Union of Democrat Meskhs" (Figure 2).

Meetings were held and information booklets were distributed in the villages of Akhaltsikhe, the territories of which are within the project implementation zone. In particular, the villages of Zikilia, Mugareti, Tskruti and Klde (Pictures 3,4,5,6).

On February 22, the meeting was held in the administrative building of Adigeni Municipality. The meeting was attended by First Deputy Mayor of the Municipality, Mr. Arsen Balakhashvili and the Head of Infrastructure Department Mr. Goderdzi Skhirtladze (Figure 7).

On February 23-24, meetings were held with the employees of Khulo and Shuakhevi municipalities, in particular, with the head of the Property Management Division of Khulo, Mr. Zurab Tavartkiladze and employees of the same department (Figure 10), with the Head of Economics, Architecture and Infrastructure Department of Shuakhevi, Mr. Davit Davitadze, with the representative of the City Hall in Shuakhevi administrative unit Mr. Gia Davitadze, as well as with local population of Shuakhevi (Pictures 8,9,11,12).

Figure 1. Meeting in Administrative building of Akhaltsikhe



Figure 2. Meeting with NGOs "Union of Democrat Meskhs



Figure 3. Meeting with local population of Tskruti village



Figure 4. Meeting with Tskruti governor



Figure 5. Placement of Information Booklet In the administrative building of Mugareti village



Figure 6. Meeting with Governor of Klde village



Figure 7. Meeting in administrative building of Adigeni Municipality



Figure 8. Meeting in Shuakhevi Municipality



Figure 9. Meeting in Shuakhevi Municipality



Figure 10. Meeting in Khulo Municipality



Figure 11. Meeting with population of Shuakhevi Municipality



Figure 12. Meeting with representatives of Shuakhevi Municipality



3.1 Project-affected parties (PAPs)

3.1.1 People affected by land acquisition

In the framework of the current project, a key category of PAPs is going to be people losing assets and/or private land and/or access to common resources due to project's land requirements.

Indeed, as the transmission line will cross forests and agricultural land, GSE will have to purchase land to locate 398 towers/poles, as well as the plot where the substation will be located. In addition, the construction contractor will need to establish working areas near each construction site – for towers, the contractor will lease about 700 square meters and near the substation about 3-4 hectares. At the towers and substation, the land will be purchased by GSE and at the substation the contractor will lease the land. In addition, approximately a 150-meter³ corridor along the 148-kilometer corridor between towers will be constituted as a buffer/safety zone. Within the corridor, an area under the energized conductors (the wires) will need to be cleared of vegetation over four meters high – therefore, trees will need to be cut within a 54.5-meter area. GSE will not buy this land but will need to place legal restrictions known as easements on the 74.5-meter corridor to prevent future buildings from being built in the safety zone. People will be paid for land as required by Georgian law and World Bank requirements.

People owning or using land in the corridor will thus be a high-priority stakeholder group which will require active and regular engagement as well as the provision of accurate information, in particular around compensation and livelihood restoration schemes.

3.1.2 People residing in the project areas

In the framework of the current project, a second key category of PAPs will be people living along the transmission line route, the access tracks and in the vicinity of the proposed substations. These PAPs are likely to be affected by disturbances caused by the Project's heavy vehicles traffic, construction impacts, etc., but may also benefit from project-related employment opportunities.

3.1.3 Municipality and village representatives

A third category of important PAPs will be municipality and village representatives. Each municipality has a mayor, city council with a chairman, and in each village, there are the trustees of a mayor and governors. Every village has

³This buffer zone or safety zone is formed by the required 30 meters on each side of the conductor (wire) and 14.5m between the two conductors on each towers: $30 + 14.5 + 30 = 74.5$. This is the zone in which no houses or auxiliary buildings are allowed under Georgian law.

a village representation building, where 6 people are employed (funded from the state budget); these are: village governor, village trustee, deputy, culture specialist, librarian, agricultural specialist, manager.

3.2 Other interested parties (OIPs)

3.2.1 Other interested parties – External

The table 1 below summarizes the key categories of OIPs and the respective justification for their interest in the project.

Table 1: Other interested parties - external

Other interested parties	Interest in the project
<p>Ministries and Government agencies</p> <ul style="list-style-type: none"> • Ministry of Economy and Sustainable Development (formerly Ministry of Economy), Ministry of Finance, Ministry of Regional Development and Infrastructure • Ministry of Environmental Protection and Agriculture • National Agency of Public Registry • Agency for Protected Areas • Ministry of Culture and Sport & Agency for National Heritage Preservation 	<p>Overall: To ensure project compliance with Georgian legislation (e.g. energy policies, environmental performance) during construction and operation</p> <ul style="list-style-type: none"> • Promote economic development • Specific involvement in some project-related mitigation measures • Engage with the public and disclose the Local Georgian EIA Scoping Report, EIA Report and Environmental Decision • Register land plots as required under the project • Responsible for the protected areas and proposed protected areas that are or will be created in the vicinity of the Project • Responsible for sites of potential archaeological interest that could be affected by the project, and monuments of national interest in the vicinity of the Project
<p>Local government departments</p> <p>Municipalities and villages</p>	<p>Protect the rights of inhabitants in the project area</p> <p>Represent the local communities/PAPs; receive and address any feedback and grievances from them</p>
<p>Non-governmental organisations (local, regional, national)</p>	<p>Ensure the environmental and social performance of the Project is protecting the environment and affected people and complies with international E&S standards</p>
<p>Business and workers' organisations</p>	<p>Interest in procurement and supply chain, potential environmental and social impacts as well as community health and safety</p>
<p>Other project developers reliant on or in the vicinity of the Project (e.g. associated facilities) and their financiers (e.g. ADB, EBRD, KfW, IFC)</p>	<p>May require operation of the Project to enable the export of power</p> <p>Can help Identify interactions and cumulative impacts with other proposed developments</p>
<p>Press and media</p>	<p>Inform residents in the project area and the wider public about the Project implementation and planned activities</p>
<p>General public, tourists, jobseekers</p>	<p>Interest in the general socio-economic impacts of the project, both adverse and beneficial</p>

Academic institutions (e.g. universities, think tanks, schools)	<p>Potential concerns regarding environmental and social impacts</p> <p>Potential educational/outreach opportunities to increase awareness and acceptance of the project</p>
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3.2.2 Other interested parties – Internal

Internal interested parties with stakes in the project include GSE Staff; Supervision Consultants; Contractors; Sub-contractors; service providers, suppliers and their workers.

3.3 Disadvantaged / Vulnerable individuals or groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies.

disadvantaged / vulnerable individuals or groups in the project area include “those registered as poor with the local social services; women-headed households; elder-headed households (\geq pension age) without any other household member bringing in income; and households headed by disabled people” (SLR Consulting, 2018: 15). No ethnic or religious minorities are known to be present in project areas, and local people do not rely heavily on provisioning ecosystem services for livelihoods.

As outlined in the ESIA, “even minor impacts can have added significance to vulnerable people, especially the poor. For that reason, GSE will provide additional compensation for permanent loss of land, buildings, or other assets and for restrictions on future land use when the land or assets are owned or used by vulnerable people such as the elderly, poor, and internally displaced. GSE also will provide special assistance as needed to ensure these people will not suffer any reduction in their standard of living or income”.

3.4 Summary of stakeholder interest in and influence over the project

The table 2 provided below summarizes the level of interest in and potential influence over the project of the various stakeholder categories identified above. Categories color-coded in red will require regular and frequent engagement, typically face-to-face and several times per year, including written and verbal information. Categories color-coded in orange will require regular engagement (e.g. every half-a-year), typically through written information. Finally, categories color-coded in green will require infrequent engagement (e.g. once a year), typically through indirect written information (e.g. mass media).

Table 2: Analysis and prioritization of stakeholder groups based on level of interest in and influence over the project

	High ability or likelihood to influence or impact the project	Medium ability or likelihood to influence or impact the project	Low ability or likelihood to influence or impact the project
High level of interest in the project	<ul style="list-style-type: none"> • People affected by land acquisition • People residing in project areas • Vulnerable households • National Ministries and Government Agencies 	<ul style="list-style-type: none"> • Local Government Departments • Municipalities and villages 	
Medium level of interest in the project	<ul style="list-style-type: none"> • NGOs • Press and Media 	<ul style="list-style-type: none"> • Businesses and workers' organisations 	<ul style="list-style-type: none"> • Academic institutions • General public, tourists, jobseekers
Low level of interest in the project			<ul style="list-style-type: none"> • Other project developers and their financiers

4. Stakeholder engagement program

4.1 Planned stakeholder engagement activities

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table 3 below presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the three main project stages (RAP preparation, implementation and project design; construction; post-construction and operation phase). A more detailed explanation of the stakeholder engagement methods used is included in section 5.2.

Table 3: Planned stakeholder engagement activities by project phase

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
<i>RAP preparation and implementation; Detailed Design</i>	Project Affected Parties - People affected by land acquisition; People residing in project area; Vulnerable households	Land acquisition process; Assistance in gathering officials documents for early land registration; Compensation rates and methodology; Project scope and rationale; Project E&S principles; Resettlement and livelihood restoration options; Grievance mechanism process	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism PAP survey - Upon completion of resettlement	Project launch meetings in municipalities; Monthly meetings in affected municipalities and villages; Survey of PAPs in affected villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	GSE (Environment & Social Team, CLOs, land acquisition department); RAP consultant; Municipal grievance committee
	Other Interested Parties (External) National Agency of Public Registry; Municipalities (including Mayor's representatives in villages)	Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance mechanism process	Face-to-face meetings; Joint public/community meetings with PAPs	Weekly (as needed)	GSE (E&S team, CLOs, land acquisition department); RAP consultant

	<p>Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers</p>	<p>Land acquisition process; Grievance mechanism process; Project scope, rationale and E&S principles</p>	<p>Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipalities and HQ; Grievance mechanism; Project tours for media, local representatives</p>	<p>Project launch meetings; Monthly meetings in affected municipalities and villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)</p>	<p>GSE (E&S team, CLOs, land acquisition department)</p>
	<p>Other Interested Parties (External) Other Government Departments from which permissions/clearances are required; Other project developers reliant on or in the vicinity of the Project and their financiers</p>	<p>Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Grievance mechanism process</p>	<p>Face-to-face meetings; Invitations to public/community meetings</p>	<p>As needed</p>	<p>GSE (E&S team, CLOs, land acquisition department)</p>
	<p>Other Interested Parties (Internal) Other GSE Staff; Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers</p>	<p>Project information - scope and rationale and E&S principles; Training on ESIA and other sub- management plans; Grievance mechanism process</p>	<p>Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings</p>	<p>As needed</p>	<p>GSE (E&S team, CLOs, land acquisition department)</p>

<i>Construction (mobilization, construction, demobilization)</i>	<p>Project Affected Parties -</p> <p>People affected by land acquisition; People residing in project area; Vulnerable households</p>	<p>Land acquisition process (land registration; compensation rates and methodology; livelihood restoration) Grievance mechanism process; Health and safety impacts (EMF, Construction-related safety measures); Employment opportunities; Environmental concerns; GBV awareness-raising</p>	<p>Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; individual outreach to PAPs Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism Citizen/PAP survey - Upon completion of resettlement and/or construction</p>	<p>Monthly/quarterly meetings in all affected municipalities and villages with ongoing construction; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)</p>	<p>GSE (E&S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors; NGOs/trainers; Municipal grievance committee</p>
	<p>Other Interested Parties (External)</p> <p>National Agency of Public Registry; Municipalities (including Mayor's representatives in villages)</p>	<p>Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance mechanism process</p>	<p>Face-to-face meetings; Joint public/community meetings with PAPs</p>	<p>Weekly (as needed)</p>	<p>GSE (E&S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub-contractors;</p>
	<p>Other Interested Parties (External)</p> <p>Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers</p>	<p>Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Health and safety impacts; Employment opportunities; Environmental concerns; Grievance mechanism process</p>	<p>Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipalities and HQ; Grievance mechanism; Project tours for media, local representatives</p>	<p>Monthly/quarterly meetings in all affected municipalities with ongoing construction and headquarters; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)</p>	<p>GSE (E&S team, CLOs, land acquisition department)</p>

	Other Interested Parties (Internal) Other GSE Staff; Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers	Project information - scope, rationale and E&S Principles; Training on ESIA and other sub- management plans; Grievance mechanism process	Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings	As needed	GSE (E&S team, CLOs, land acquisition department); Supervision and RAP consultants; Contractor/sub- contractors;
<i>Post-construction and Operation phase (within life of the Project and defect liability period)</i>	Project Affected Parties - People affected by land acquisition; People residing in project area; Vulnerable households	Satisfaction with engagement activities and GRM; Grievance mechanism process; Electro-magnetic fields; Community health and safety measures during TL operation; Assessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any)	Public meetings, trainings/workshops, individual outreach to PAPs Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism PAP survey - Upon completion of resettlement	Meetings in affected municipalities and villages (six-monthly); Survey of citizens/PAPs in affected villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	GSE (E&S team, CLOs, land acquisition department)
	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers	Grievance mechanism process; Electro-magnetic fields; Community health and safety measures during TL operation;	Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipalities and HQ; Grievance mechanism; Project tours for media, local representatives	Meetings in affected municipalities (six- monthly); Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	GSE (E&S team, CLOs, land acquisition department)

4.2 Detail on engagement methods to be used

4.2.1 Public/community meetings

At the start of the project, GSE will organise project launch meetings in each of the 7 municipalities. From then on, 7 Community Liaison Officers (one per municipality) will help organize community meetings/sensitization sessions in all villages on a quarterly basis throughout the project's lifecycle. The salary of these Community Liaison Officers (CLOs) will be provided through the project. Meetings in each of the 7 municipalities will also be organized on a monthly basis.

4.2.2 Mass/social media communication

A social media expert (from GSE's Public Relations Department or an external consultant) will be engaged on the Project for 6 months/year in order to post information on the dedicated project and GSE Facebook page, and to communicate with the local population via social media campaigns or tools like WhatsApp throughout the project's lifecycle. Social media channels will be used as much as possible to disseminate information as rates of social media use (especially Facebook) appear to be high across users of different age and background in project affected communities.

4.2.3 Communication materials

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. GSE will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance both in English and Georgian. The website will also provide information about the grievance mechanism for the project (see next sub-section).

4.2.4 Grievance redress mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project. Dedicated communication materials (GRM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures. A GRM guidebook/manual will also be developed and suggestion boxes installed in each affected municipality and village. In order to capture and track grievances received under the project, a dedicated GRM Management Information System/database is planned. GRM committees at the municipal level will benefit from training on how to receive, respond to, address and close grievances in line with best international practices. Internal GRM training will also take place for GSE and contractor staff. The GSE's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GRM committee works, both in terms of process and deadlines.

4.2.5 Project tours for media, local representatives

At appropriate points during the construction phase, site visits or demonstration tours will be organised for selected stakeholders from media organizations or local government. On average, it is planned that 3 such tours will be planned per year.

4.2.6 Information Desks

Information Desks in each municipality will provide local residents with information on stakeholder engagement activities, construction updates, contact details of the GSE Community Liaison Officer etc. CLOs in the affected municipalities will set up these information desks, either in their offices or other easily accessible places where

they can meet and share information about the project with PAPs and other stakeholders. Brochures and fliers on various project related social and environmental issues will be made available at these information desks.

4.2.7 Citizen/PAP perception survey

A perception survey examining citizen's experience and feedback about the project will be carried out twice during the project's lifecycle: once around the mid-implementation phase, and once towards the end of the project's implementation.

4.2.8 Trainings, workshops

Finally, trainings on a variety of social and environmental issues will be provided to GSE and contractor staff and possibly relevant government or non-government service providers. Issues covered will include a sensitization to gender-based violence risks.

4.3 Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of CLOs will help to ensure proactive outreach to all population groups. Training and awareness raising sessions will be conducted in villages rather than municipal centers to ensure higher participation of targeted population. Focus groups dedicated specifically to vulnerable groups may also be envisaged as appropriate.

4.4 Information disclosure

The current GSE website (<http://www.gse.com.ge/home>) is being used to disclose project documents, including those on environmental and social performance in both Georgian and English. GSE will create a webpage on the Project on its existing website. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the homepage of GSE's website. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on the website. Details about the Project Grievance Resolution Mechanism will be posted on the website. An electronic grievance submission form will also be made available on GSE's website. Contact details of the Community Liaison Team and headquarters and all Community Liaison Officers at the Municipality level will also be made available on the website. GSE will update and maintain the website regularly (at least once a quarterly basis). Further, GSE will create a dedicated project Facebook page and a WhatsApp group for PAPs and other stakeholders.

5. Roles, Responsibilities and Resources for Stakeholder Engagement

5.1 Implementation Arrangements

GSE will mobilize human and material resources to implement the SEP and manage the Grievance Resolution Mechanism (GRM). SEP activities will be led by GSE’s International Projects Department with relevant responsibilities being taken on by the Project Permissions Department, the Technical Supervision Department and the Public Relations Department⁴. A core Community Liaison Team comprised of staff from these departments will take responsibility for and lead all aspects of the stakeholder engagement. The team will be supported by part-time and full-time consultants, as needed. In addition to 3-4 staff at GSE headquarters, Community Liaison Officers (CLOs) will be recruited in each of the five Project-Affected Municipalities. A communication specialist and facilitator from the Public Relations Department, will be an integral part of the Community Liaison Team. The Permissions Department Manager will be overall in charge of the grievance resolution mechanism. The Project Grievance Focal Point will also be part of the Community Liaison Team. Furthermore, a number of land acquisition and resettlement experts from the Permissions Department will be engaged to implement the RAP(s). Environmental and Social experts will be responsible for the environmental and social impact assessment and performance of the Project. Specific named personnel will be established for these roles as the project progresses.

The material resources that GSE will mobilize are – (i) a Project specific area on the GSE website; (ii) an electronic grievance database; (iii) a stakeholder engagement register; (iv) a Facebook page and a WhatsApp group for the project; (v) printed documents (manuals, brochures, posters, etc.) that will be used, based on the needs of the SEP.

5.2 Roles and Responsibilities

A core Community Liaison Team comprised of GSE staff from the Project Permissions Department, the Technical Supervision Department and the Public Relations Department will take responsibility for and lead all aspects of the stakeholder engagement. However, to implement the various activities envisaged in the SEP, the Community Liaison Team will need to closely coordinate with other key stakeholders – other national and local government departments/agencies, GSE departments, the Supervision and ESIA/RAP consultants, the contractor along with sub-contractors, affected municipalities and PAPs. The roles and responsibilities of these actors/stakeholders are summarized in the Table 4 below.

Table 4: Responsibilities of key actors/stakeholders in SEP Implementation

Actor/Stakeholder	Responsibilities
GSE (Community Liaison Team, CLOs)	<ul style="list-style-type: none"> • Planning and implementation of the SEP; • Leading stakeholder engagement activities; • Management and resolution of grievances; • Coordination/supervision of contractors on SEP activities; • Supervision/monitoring of RAP and Implementation Consultants; • Monitoring of and reporting on environmental and social performance to GSE management and the World Bank
Implementation Consultants	<ul style="list-style-type: none"> • Supervision/monitoring of Contractor; • Management of engagement activities during the construction phase
Contractors/sub-contractors	<ul style="list-style-type: none"> • Inform GSE of any issues related to their engagement with stakeholders;

⁴The proposed implementation arrangements are subject to change with GSE’s impending restructuring.

	<ul style="list-style-type: none"> • Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by GSE/Implementation Consultant and by participating in the local Grievance Resolution Committee; • Prepare, disclose and implement various plans (e.g. C-ESMP, Labor Management Plan, etc.); • Inform local communities of any environmental monitoring e.g. noise, vibration, water quality monitoring; • Announce important construction activities (such as road closures and available alternatives);
National Government Departments - <ul style="list-style-type: none"> • Ministry of Economy and Sustainable Development • Ministry of Environmental Protection and Agriculture, • Agency for Protected Areas • Ministry Culture and Sport • National Agency of Public Registry 	<ul style="list-style-type: none"> • Monitor Project compliance with Georgian legislation; • Participate in the implementation of some activities in the ESMP/RPF and SEP; • Participate in the implementation of the Land Acquisition process; • Make available and engage with the public on the Scoping and EIA Reports.
Affected municipalities and local communities	<ul style="list-style-type: none"> • Transfer all complaints to the GSE GRM Focal Point; • Participate in the local Grievance Resolution Committee (see Section 6.0 Grievance Mechanism); • Make available the disclosed ESIA documents;
Project affected people	<ul style="list-style-type: none"> • Invited to engage and ask questions about the Project at Project Meetings and through discussions with Community Liaison Officers where it is of interest or of relevance to them; • Lodge their grievances using the Grievance Resolution Mechanism defined in the SEP (Section 6.0 Grievance Mechanism); • Help the Project to define mitigation measures;
Other Project developers	<ul style="list-style-type: none"> • Engage with GSE regarding project design; • Share ESIA information and documentation with GSE to enable the assessment of cumulative impacts

5.3 Estimated Budget

A tentative budget for implementing the stakeholder engagement plan over five years is attached in Table 5. The stakeholder engagement activities featured below cover a variety of environmental, social and expropriation issues, which may be part of other project documents, so it is possible that they have also been budgeted in other plans. However, the table 5 below summarizes all the stakeholder engagement activities in one place for better coordination and monitoring. GSE will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and a new revision distributed. The budget will be revised accordingly.

Table 5: Stakeholder Engagement Plan - Estimated Budget (5 Years)

<i>Stakeholder Engagement Activities</i>	Quantity	Unit Cost (USD)	Times/Years	Total Cost (USD)	Remarks
Staff salaries (7 CLOs in 5 Municipalities @\$500 per month)	7	\$ 6,000	5	\$ 210,000	
Social media staff/consultant (6 months/year @\$1000 per month)	1	\$ 6,000	5	\$ 30,000	
Travel expense for staff/CLOs (cost per year)		\$ 14,000	5	\$ 70,000	
Information Desk (one in each municipality)	7	\$ 200	1	\$ 1,400	
Project Launch Meetings (in 5 Municipalities)	7	\$ 2,500	1	\$ 17,500	Space rent, catering, printed materials
Community Meetings/Sensitization (in 20 villages, quarterly)	88	\$ 100	5	\$ 44,000	
Municipality Meetings/Sensitization (in 7 Municipalities, monthly)	84	\$ 100	5	\$ 42,000	
Communications materials (pamphlets, posters, PR kits-including design)				\$ 30,000	10 different topics - GBV, EMF, community health/safety, environment, land acquisition, contractor damages, etc.
Project tours for media, local representatives (4 per year)	4	\$ 1,000	2	\$ 8,000	20 representatives per tour
Engaging service providers, govt or non-govt (e.g. GBV, env issues)		\$ 10,000	5	\$ 50,000	
Training on environment/social issues for GSE and contractor/consultant staff		\$ 1,400	5	\$ 7,000	
GBV training for relevant GSE and contractor/consultant staff	2	\$ 500	2	\$ 2,000	
Citizen/PAP perception surveys		\$ 2,500	2	\$ 5,000	
Sum				511,900	
Contingency (10%)				\$ 51,100	
Sub-Total - Stakeholder Engagement				\$ 563,000	
<i>Grievance Redress Activities</i>	Quantity	Unit Cost (USD)	Times/Years	Total Cost (USD)	Remarks
Communications materials (GRM pamphlets, posters)	5000	\$ 0.5	2	\$ 5,000	
GRM guidebook/manual	500	\$ 10	1	\$ 5,000	
Suggestion boxes (in each municipality and villages)	30	\$ 50	1	\$ 1,500	
GRM MIS/Database	1	\$ 20,000	1	\$ 20,000	Included in procurement plan
Training of GRM committees at municipality-level	5	\$ 100	5	\$ 2,500	One training/year in each municipality
Internal GRM Training for GSE and contractor staff	1	\$ 500	5	\$ 2,500	One training for GSE staff per year
Contingency (10%)				\$ 3,650	
Sub-Total - Grievance Redress				\$ 40,150	
Total				\$ 603,150	

6. Grievance redress mechanism

The Grievance Resolution Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner, that arise in the Project, either due to actions by GSE or the contractor/sub-contractors employed by GSE, from affected communities and external stakeholders. A separate mechanism is developed to address worker grievances. GSE is responsible for managing the GRM, but many of the grievances on the Project will likely relate to the actions of the Contractor and so will need to be resolved by the Contractor. GSE with the support of the Implementation Consultant will administer the GRM process deciding whether they or the Contractor is responsible and determining the best course of action to resolve the grievance. The Implementation Consultant will support GSE to monitor grievance resolution being undertaken by the contractor.

The project GRM deals with the issues of land and other assets acquisition (e.g. amount of compensation, suitability of residual land plots, loss of access roads, etc.) as well as the losses and damages caused by construction works, and any direct or indirect environmental and social impacts. Therefore, the grievance redress mechanism has to be in place by the time GSE starts preparation of RAP, ESIA and shall function until the completion of all construction activities and beyond till the defect liability period ends. PAPs and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultations meetings and other stakeholder engagement activities.

Typical grievances for transmission line projects include those related to:

- Land acquisition and physical displacement;
- Construction damages;
- Environmental impacts; and
- Direct and/or indirect social impacts.

GSE will implement an effective GRM, with the objective of helping third parties to avoid resorting to the judicial system as far as possible. GSE's GRM includes three successive tiers of extra-judicial grievance review and resolution: (i) the first tier is the Grievance Resolution Committee (GRC) at the Municipal level; (ii) the second tier is the GRM Focal Person at GSE headquarters at the national level; and finally, (iii) the third tier is the Grievance Redress Commission (GRC) comprising of senior GSE management at GSE headquarters. level. Complainants can seek redress from the judicial system at any time. The step-by-step process does not deter them from approaching the courts.

All grievance related correspondence will be documented and the grievance resolution process will be systematically tracked.

6.1 Grievance Process

The three-stage grievance resolution process involves the following main steps:

- i. Receipt of grievances;
- ii. Screening for standing;
- iii. Grievance Resolution Committee (first stage);
- iv. GSE resolution at central level (second stage);
- v. GSE Grievance Redress Commission (third stage);

- vi. Closure of grievances;
- vii. Grievance records and documentation.

These steps are described hereafter.

6.1.1 Receipt of Grievances

Anyone from the affected communities or anyone believing they are affected by the Project can submit a grievance:

- By completing a written grievance registration form that will be available - (i) in the Town halls of the local municipalities and in the affected villages and by local CLOs (i.e. those within proximity of construction activities); (ii) at the entrance of each construction site; (iii) on the Project's website; and (iv) at the Project's headquarters in Tbilisi. An example of a grievance registration form is provided in Annex 1. The Project's Community Liaison Officer of each Municipality will review the received grievances and record them in a Grievance Register.
- By contacting the GSE Community Liaison Officer at the Municipality level, GSE Permissions Department Manager at the national level, or the environmental coordinator and community relationships managers of the Contractor, either by phone, or in person. Grievances received verbally will be written down by the Community Liaison Officer on the grievance registration form and logged into the Grievance Register. A copy of the logged grievance will be forwarded to the complainant, giving them the opportunity to alert GSE if the grievance has not been noted down correctly.

The Community Liaison Officers will explain the possibilities and ways to raise a grievance to local communities or GSE Permissions Department Manager during meetings organised in each affected area at the time of disclosure. The GRM procedures will be disclosed through the Project's website and will also be advertised on billboards/posters in each community and at the entrance of the local Town halls. Information material on the GRM will also be made available at the information desks in the Town halls of each Municipality.

In order to ensure that all grievances are captured, the GSE Permissions Department Manager will contact the Municipality authorities and the Ministry of Economy and Sustainable Development, the MEPA, Ministry of Environmental Protection and Agriculture, the National Agency of Public Registry to explain how the grievances they may receive concerning the project should be channeled through the Project's GRM. Information on the way to log a grievance locally, at GSE office in Tbilisi or through the project's website will be explained to these authorities and the GSE Permissions Department Manager will call them regularly to ensure no grievances are missed.

All grievances will be registered, reported and tracked by GSE in the Grievance Register by a Grievance Focal Point who is responsible for receiving, logging, referring and following up on grievances. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to prevent similar grievances. The status number and trends of grievances will be discussed between GSE, the Contractor and the Implementation Consultant during weekly E&S meetings during the construction phase.

6.1.2 Screening for 'Standing'

Once a grievance is received, the GSE Permissions Department Manager will determine whether the complaint has 'standing,' i.e., warrants further consideration as an acceptable grievance.

The resolution of grievances of all types will follow the same steps, but the stakeholders involved will depend on the nature of the grievance. All grievances will be handled through the system described hereafter, involving respectively the Permissions Department Manager (GSE), the Grievance Focal Point, the Contractor's grievance

resolution representative, and the Implementation Consultant as representatives of the Project. Complaints related to resettlement (land take and its consequences) will also involve Resettlement Action Plan (RAP) consultant in the resolution of grievances related to land acquisition and resettlement.

If the matter has standing, grievance information will be recorded in a grievance log by GSE's Grievance Focal Point. The following information will be recorded: (i) Name and contact details, (ii) Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out. All grievances will be acknowledged within 7 days; and responded to no later than 30 days. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to ensure proper close-out of the grievance and prevent similar grievances from recurring in the future.

If the grievance is deemed as ineligible, the GSE Community Liaison Officer will record the reason and document that the complainant has been informed of this decision and the basis for this is explained. Ineligible cases will generally be those that GSE are confident have not occurred as a result of the actions of GSE or its Contractor/Sub-Contractors. If the complainant is not satisfied with this outcome, they can pursue further action by submitting their case to GSE's Grievance Redress Commission or the appropriate court of law (Rayon Court).

GSE will determine whether the resolution of the grievance is the responsibility of the Contractor (or their sub-contractors), GSE or the Implementation Consultant. If the grievance is the responsibility of the Contractor or the Implementation Consultant, GSE shall review, comment and approve any corrective actions.

After logging the grievance, the GSE Permissions Department Manager and/or the Grievance Focal Point will inform the complainant in writing within 10 days.

6.1.3 Grievance Resolution Committee (Stage 1)

Stage 1, of the GRM involves an informal (oral) review of the complaint (whether written or oral). A local Grievance Resolution Committee (GRC) will be established in Municipality, with an office in the municipal building. Once a standing grievance has been logged, the corresponding local GRC will be engaged to define a solution to solve the grievance. At this stage the grievance is reviewed in an informal (oral) way and the Grievance Redress Committee members make and sign the minutes on the matter. If at Stage 1 the PAP's complaint is not resolved the PAP is informed about grievance resolution procedures of Stage 2. A PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 7 days. The GRC shall convene as per necessity (but at least once a month) and shall include eight members. Special provisions will be made for any complaints of a confidential nature. The GRC is an eight-member committee comprising of the following:

- 1) Georgian State Electrosystem (GSE) representative as a Committee coordinator;
- 2) Regional/municipal representative (from "Gangeoba") as a Committee secretary;
- 3) Village attorney ("Rtsmunebuli") as a Committee member;
- 4) Representative of a Project Affected People (AP) as a Committee member;
- 5) Woman – representative of the Project Affected Household (AH) as a Committee member;
- 6) Representative of local non-government organization (NGO) taking into account the grievance character – as a Committee member;
- 7) Local specialist of social and environmental safeguards from the Supervision Consultant – as a Committee member;
- 8) Local specialist of social and environmental safeguards from the Construction Company – as a Committee member.

The GSE CLO at the Municipality level will act as secretary of the GRC (creation, coordination, and documentation). Members of the GRC will be invited in accordance with the types of complaints to be addressed. The meeting will start without the complainants by reviewing all PAP complaints received since the last GRC meeting, and to

propose a solution to all grievances within the past one or two weeks. Then, the GRC will welcome the complainants whose grievances had been reviewed during the previous meeting to discuss proposed resolution.

For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting and will also be provided to the PAP before the meeting. The GRC will then inform the PAP about the date, time and place of its review meeting, and invite the PAP accordingly.

The GRC will receive the complainant and discuss with them a solution to their grievance. The committee shall draw up and sign the minutes of their discussion on the matter. If the grievance is satisfactorily resolved, the PAP will also sign the minutes in acknowledgement of the agreement. In cases where the project has agreed to put in place additional measures, these will be specified, with a timetable for delivery, in the minutes of the meeting. If the grievance remains unresolved, the PAP will be explained the Stage 2 escalation process.

Grievance redress procedure of Stage 1 is an informal tool of dispute resolution allowing PAPs and the project implementation team to resolve the disagreement without any formal procedures, procrastination and impediments. International experience in different projects shows that such informal grievance redress mechanisms help to solve most of the complaints without formal procedures (i.e. without using the procedures specified in the Administrative Code or litigation). If the PAP is not satisfied, the grievance redress mechanism assists him/her in lodging an official grievance in accordance with the procedures of Stage 2 (the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a grievance, format of grievance, terms of grievance submission, etc.).

6.1.4 Grievance Resolution at Central Level (Stage 2)

In this stage, the grievance will be reviewed at the GSE level. Unsolved grievances at Stage 1, with the complainant's consent, will be sent to GSE in written form. Similarly, aggrieved complainants/PAPs dissatisfied with the GRC decision, can escalate their grievances to GSE at the central level. The GRC will assist him/her in lodging an official complaint. GSE's GRM Focal point will review the written complaints of PAPs, which were not satisfied at Stage 1 and send them internally to the appropriate departments (legal, technical, contracts etc.) for redress. The timeframe for referral is 10 days. The complainant shall be informed of the decision within a maximum of 30 days, in accordance with the response time stipulated in the Administrative Code of Georgia.

6.1.5 GSE Grievance Redress Commission (Stage 3)

If the grievance continues to be unresolved at Stage 2 by the appropriate department, it will be presented to GSE's Grievance Redress Commission. The Grievance Redress Commission will review and decide upon the grievance in compliance with the Administrative Code of Georgia. The complainant shall be informed in writing of GSE's decision. If GSE's decision fails to satisfy the aggrieved affected persons, they can pursue further action by submitting their case to the appropriate court of law. The composition of the Grievance Redress Commission is as follows

- 1) Member of Board of Georgian State Electrosystems (Head of the Grievance Redress Commission);
- 2) Head of Permissions Department (Deputy Head of Commission);
- 3) Deputy Head of Permissions Department (member);
- 4) Head of Legal Division (member);
- 5) Head of Resettlement Division (member);
- 6) Head of International Projects Division (member);
- 7) Head of Technical Supervision and International Projects Planning Division (member);
- 8) Resettlement and social issues consultant (member);
- 9) Environmental coordinator for international projects (member).

6.1.6 Closure of Grievances

A grievance will be considered “resolved” or “closed” when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented to the satisfaction of the complainant, a complaint close out form will be signed by both parties (GSE Permissions Department Manager or his representative and the complainant), stating that the complainant considers that his/her grievance is closed. The grievance then, will be archived in the Project Grievance database.

In certain situations, however, the Project may “close” a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or it is obviously speculative or fraudulent. In such situations, the Project’s efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. GSE will not dismiss grievances based on a cursory review and close them unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

6.1.7 Grievance Records and Documentation

GSE will nominate a GRM Focal Point to manage a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by the Contractor or other relevant party; the final result; and how and when this decision was communicated to the complainant.

Supervisor and construction companies in their monthly monitoring reports will provide information on grievance management. Grievance monitoring and reporting will occur in GSE’s six-monthly and annual public reports.

6.2 Workers’ Grievance Mechanism

GSE, currently, does not have a grievance mechanism in place which allows its employees to raise workplace concerns. The conciliation procedure which is provided by the Labor Code is not utilized. There is no system in place to track grievances received by GSE employees.

GSE’s HR Department will develop and implement a grievance mechanism for GSE employees to address workplace concerns. The establishment of this grievance mechanism is part of the proposed corporate GSE restructuring. This grievance mechanism for direct workers, i.e. GSE employees, will be established by Project effectiveness.

GSE will require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of civil works. The construction contractors will prepare their labor management procedure before the start of civil works, which will also include detailed description of the workers grievance mechanism.

The workers grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances;
- a register to record and track the timely resolution of grievances;
- a responsible department to receive, record and track resolution of grievances.

The Supervision Consultant will monitor the contractors' recording and resolution of grievances, and report these to GSE in their monthly progress reports. The process will be monitored by the GRM Focal Point, a GSE representative who will be responsible for the project GRM.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed.

6.3 GSE Contact Information

The point of contact regarding grievance management and the local stakeholder engagement activities is the Permissions Department Manager:

Description	Contact details
Company:	Georgian State Electrosystem (GSE)
To:	GSE Permissions Department Manager
Address:	2 Baratashvili street, Tbilisi 0105, Georgia
E-mail:	[TO BE ADDED]
Website:	www.gse.com.ge
Telephone:	[TO BE ADDED]

Information on the Project and future stakeholder engagement programs will available on the Project's website and will be posted on information boards in affected villages in the Project area. Information can also be obtained from the Community Liaison Officers.

Six-monthly E&S reports that document the implementation of the Stakeholder Engagement Plan (SEP) will be disclosed on the Project website and made available in the local town halls.

In addition, for information on engagement with national and international stakeholders, and for information on the environmental and social performance of the Project, NGOs, CSOs and media are invited to contact GSE Head of Communications in Tbilisi:

Description	Contact details
Company:	Georgian State Electrosystem (GSE)
To:	GSE Head of Communications
Address:	2 Baratashvili street, Tbilisi 0105, Georgia
E-mail:	[TO BE ADDED]

Description	Contact details
Website:	www.gse.com.ge
Telephone:	[TO BE ADDED]

7. Monitoring and Reporting

7.1 Monitoring reports during construction

Monitoring reports documenting the environmental and social performance of the Project during construction will be prepared by the Community Liaison Team for submission to GSE management and to the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. Table 6 proposes a comprehensive set of indicators related to SEP performance at this stage.

Table 6: SEP Indicators To Be Documented In Progress Reports

Engagement with PAPs
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number of men and women that attended each of the meetings above
Number, location, attendance and documentation of the meetings held with the municipalities and communities or other stakeholders
For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project ESMP.
Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the report. They will summarize the view of attendees and distinguish between comments raised by men and women.
Engagement with other stakeholders
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs)
Issues raised by NGOs and other stakeholders, actions agreed with them and status of those actions
Minutes of meetings will be annexed to the six-monthly report
Number and nature of Project documents publicly disclosed
Number and nature of updates of the Project website
Number and categories of comments received on the website
Grievance Resolution Mechanism
Number of grievances received, in total and at the local level, at Tbilisi headquarters, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of local GRC meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report)

Trends in time and comparison of number, categories, and location of complaints with previous reporting periods
Workers Grievances
Number of grievances raised by workers, disaggregated by gender of workers and worksite
Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.
Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

The reporting on Environmental and Social activities conducted by GSE and the Supervision and ESIA/RAP Monitoring Consultants during the construction phase will be undertaken in accordance with the requirements of the ESMP.

7.1.1 Quarterly and Annual Reports by GSE

During the Project development and construction phase, the Community Liaison Team will prepare brief monthly reports on E&S performance for GSE Management which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 6. Monthly reports will be used to develop quarterly and annual reports reviewed by senior GSE managers. The quarterly and annual reports will be disclosed on the Project website and made available in the Town halls of the project affected Municipalities.

7.1.2 Six Monthly E&S Compliance Reports to the World Bank

Six-monthly E&S reports will be prepared and submitted to the World Bank during the construction period. A section on stakeholder engagement will be included in these reports which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 6.

7.2 Monitoring reports during operation

7.2.1 Annual Reports by GSE

At the end of each year of operation, the Community Liaison Team will prepare an annual summary report on E&S performance for GSE Management which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 6. The annual reports will be disclosed on the Project website and made available in the Town halls of the project affected Municipalities.

7.2.2 Six Monthly E&S Compliance Reports to the World Bank

During the first three years of operation, six-monthly and annual E&S compliance reports will be prepared and submitted to the World Bank. Annual E&S compliance reports will then be prepared and submitted to the World Bank during the rest of the operation period. A section on stakeholder engagement will be included in these E&S compliance reports.

In addition, GSE will prepare Incident Notifications for the World Bank, if and when, required.

7.3 Involvement of stakeholders in monitoring activities

The Project provides several opportunities to stakeholders, especially Project Affected Parties to monitor certain aspects of Project performance and provide feedback. Grievance Resolution Committees in each of the five affected Municipalities will allow PAPs to submit grievances and other types of feedback. Citizen/PAP surveys at the project mid-point and end stages will also allow PAPs to provide feedback on project performance. Furthermore, frequent and regular community meetings and interactions with GSE staff, especially local CLOs, will allow PAPs and other local stakeholders to be heard and engaged.

7.4 Reporting back to stakeholder groups

GSE's Community Liaison Team and its CLOs, will report back to PAPs and other stakeholder groups, primarily through public meetings in project affected Municipalities and/or Villages. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GRM will be responded to in writing and verbally, to the extent possible. Sms' and phone calls will be used to respond to stakeholders whose telephone numbers are available. Key Project updates will be posted on GSE's website. Social media (primarily through the Project Facebook page and a WhatsApp group for PAPs and other stakeholders) will also be used to report back to different stakeholders.

8. References

DG Consulting Ltd. 2019. *Environmental Impact Assessment Report For Construction And Operation Of The 500kv Jvari-Tskaltubo Transmission Line And Tskaltubo Substation, Volume 1*. Prepared for: GSE.

SLR Consulting. 2018. *Georgia Electricity Transmission Network Development Projects. Environmental and Social Impact Assessment, Volume 6 Stakeholder Engagement Plan*. Prepared for: GSE.

World Bank. 2017. *Environmental and Social Framework*.

World Bank. 2018a. *Template for ESS10: Stakeholder Engagement and Information Disclosure Stakeholder Engagement Plan and Stakeholder Engagement Framework*. Environmental and Social Framework for IPF Operations. ESS10: Stakeholder Engagement and Information Disclosure.

World Bank. 2018b. *Guidance Note for Borrowers*. Environmental and Social Framework for IPF Operations. ESS10: Stakeholder Engagement and Information Disclosure.

Annex 1: Grievance Submission Form

<p>Grievance Submission Form</p>	
<p>Achara # _____</p>	
<p>Name, Last name _____</p>	
<p>Contact Information</p> <p>Please indicate the preferable means of communication (Mail, Telephone, E-mail)</p>	<p><input type="checkbox"/> Mail: Please indicate the postal address: _____ _____ _____</p> <p><input type="checkbox"/> Telephone: _____</p> <p><input type="checkbox"/> E-mail: _____</p>
<p>The language desirable for the communication</p>	<p><input type="checkbox"/> Georgian <input type="checkbox"/> English <input type="checkbox"/> Russian</p>
<p>Describe the grievance/claim: _____ What is the complaint about? What is the claim?</p>	
<p>Date of Negotiation: _____</p>	<p>Resolution of Negotiation: _____</p>
<p>What is the basis of your claim?</p>	
<p>Signature: _____ Date: _____</p>	