

Stakeholder Engagement Plan (SEP) for Rengy Sarata

1 Introduction

1.1 Background

Private company Rengy Sarata (Company) has approached the European Bank for Reconstruction and Development (EBRD) for financing construction of a solar power plant in Vinnitsa Region of Ukraine. The project is thus subject to EBRD's 2014 Environmental and Social Policy and has been determined as a Category B project. EBRD's consultants have conducted an environmental and social due diligence assessment of the project and supported the development of applicable environmental and social documentation, namely, an Environmental and Social Action Plan, a Stakeholder Engagement Plan, and a Non Technical Summary of the environmental and social considerations.

Company considers stakeholder engagement as an essential part of good business practices and corporate citizenship, and a way of improving the quality of projects. In particular, effective community engagement is central to the successful management of risks and impacts on communities affected by project, as well as to achieving enhanced community benefits. To meet the EBRD requirements for stakeholder engagement and public consultation and disclosure¹, a stakeholder engagement process with development of a Stakeholder Engagement Plan (SEP) is being applied to this project. These details are laid out in this document, the SEP.

1.2 The Project

Rengy Sarata is privately-owned company based in Kiev, with operations in Shargorod Town, Vinnitsa Oblast. The company has initiated this project to construct a solar power plant with 9.5 MW installed peak capacity in the vicinity of Shargorod Town. The plant will operate on solar energy, converting it to electricity with an annual output of 10.976 million kilowatt-hours. Electricity generated at the solar plant will be connected to the 110 kV distribution grid via a 110/35/10 kV substation.

1.3 Requirements for Stakeholder Engagement and Public Consultation

Ukraine is a signatory of Aarhus Convention on Access to Information and Public Participation (UNECE)². The convention is designed to improve the way ordinary people engage with government and other decision-makers on environmental matters. Consequently, people are entitled to be informed about environment related issues pertaining to the project. National legislation also provides for public involvement in decision-making process.

As per EBRD's Environmental and Social Policy of 2014, the project funded by the Bank must meet the best international practices and requirements for stakeholder engagement and public consultations. The principles, requirements, methodological and procedural aspects of stakeholder engagement for EBRD projects are described in detail in PR10 "Information Disclosure and Stakeholder Engagement"³. This requirement outlines a systematic approach to stakeholder engagement that will help clients build and maintain over time a constructive relationship with their stakeholders, including the locally affected communities.

¹ EBRD Performance Requirement PR10

² UNECE Aarhus Convention on access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters

³ EBRD Environmental and Social Policy 2014 (<http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>)

The following elements shall be implemented for the project engagement and consultation process:

- *Identification of project stakeholder groups*, including members of the public who could be affected by the Project construction and operation.
- *Stakeholder engagement/consultation process and information disclosure*. During this stage, the Company will ensure that identified stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation. The disclosed information will include the Project activities and operations. The consultation process will be undertaken in a manner that is inclusive and culturally appropriate for all stakeholders, including effected communities and vulnerable groups.
- *Grievance mechanism* by which the general public and other stakeholders can raise concerns, and which will be handled in a prompt and consistent manner is another key element of stakeholder engagement.

1.4 Previous Stakeholder Engagement Carried out by the Developer

Rengy Sarata has a land sublease agreement with the Company Primewood (owner of Shargorod 1 solar plant) which holds a long term land lease from the regional community, that is why all necessary announcements and publications have already been made by Primewood during the land allocation process.

Primewood has informed the general public about the project via publications in local newspapers, as well as on notice boards in public places (a copy of an information notice is attached in *Annex A*). The company has also held a public consultation meeting in Shargorod Town on 17.02.2012, as part of land allocation process (Detailed Territory Plan). A protocol of this meeting is attached in *Annex B*. Also, the project was announced during several meetings with local and regional authorities, who also informed the press about these construction plans.

The company interacts with statutory stakeholders, such as regulatory authorities, on an ongoing basis.

Finally, the project approval process involves permit applications to various regulatory agencies, which have also been successfully completed.

1.5 SEP Objectives

This SEP has been developed with the aim of describing how Rengy Sarata will communicate with people and institutions who may be affected by, or interested in the Project, at various stages of project preparation and implementation. The Plan also includes a grievance mechanism for stakeholders to raise any concerns related to the project for the Company's attention.

2 Stakeholder Identification and Assessment

In order to define a communication process in line with EBRD PR10, the Company with assistance from a consultant, has identified key stakeholder groups that may be interested in, and/or affected by the Project. They include:

- Internal stakeholders, such as Rengy Sarata 's employees and construction contractors' workers;
- Local residents, including those who may be affected by the project;

- Government administrations and regulatory authorities of various levels;
- Local media and internet sites with coverage of local affairs;
- Non-governmental organisations (NGOs), including associations;
- Others who may be interested in the project.

Table 2.1 below provides the details of the Project stakeholders. It will be continuously updated and further developed by Rengy Sarata, as the project progresses.

Table 2.1 Project Stakeholders

No	Name of Stakeholder	Description	Contact Person	Contact Details
Internal				
1	Employees	Rengy Sarata employees involved in, or affected by the Project	Fedorovskiy G.V., Director Borovskiy V., Engineer	Address: Vinnitsa city, 14A, Voinov Internatsionalistov str, 2 nd floor, Phone: 0432 508 380 E-mail: info@rengydevelopment.com.ua
2	Podilskiy Energoconsulting (PEC)	General contractor of the project	Shakalov S. Director	Address: Vinnitsa city, 39A, Gonty street, 21017 Phone: 0432 554844 office@tovpek.com.ua
Local residents				
3	Residents of the Shargorod Town	Local residents		
Government and regulatory authorities				
4	Shargorod City Council	Local government	Vynokur I.M. Head of village council	Address: 13, Poshtova Str, Shargorod , Shargorod district, Vinnitsa Oblast Phone: +380 4344 2 13 69
5	Shargorod District Administration	District government	Popov M.A., Head of Shargorod District Administration	Address: 224, Geroiv Maidanu Sqr, Shargorod, Vinnitsa Oblast, Phone: +380 43442 15 05
6	Vinnitsa Oblast Administration	Regional government	Koroviy V.V.. Head of Oblast Administration	Address: Vinnitsa city, 70, Soborna str., Phone: +380432 59 2110
7	Construction, Urban Development and Architecture department of Vinnitsa Oblast Administration	Regulatory authority	Romanenko D.V., Head of department	Address: Vinnitsa city 14, Teatralnaya str. Phone: +380 432 67 09 30
8	Department of Culture and Arts of Vinnitsa Oblast Administration	Regulatory authority	Gorodynskiy S.S.. Head	Address: Vinnitsa town 7, Khmel'nitskoe highway Phone: +380 432 66-11-93
9	Department of Environment resources of Vinnitsa Oblast Administration	Regulatory authority	Tkachuk M.F.. Head of Department	Address: Vinnitsa city 19, 600 years str. Phone: +380 432 51-32-05
Other				
10	"Vinnitsa Oblenergo"	Regional electricity company	Lapa V.P. Technical Director	Address: Vinnitsa town 1-Travnia street, bld 2, Phone: +380432 52-50-01
11	Neighboring property owners and land users	Property owners and users		

3 Disclosure of Information and Stakeholder Engagement Programme

3.1 Disclosure of Information Relevant to Project

To meet the environmental and social requirements and performance standards of EBRD, the following documents will be disclosed to the public:

- Non-Technical Summary of Environmental and Social Considerations (NTS); and
- This document, Stakeholder Engagement Plan (SEP).

In addition, assisted by consultants, Rengy Sarata has developed an Environmental and Social Action Plan (ESAP), which identifies mitigation measures to minimise, reduce, eliminate or control potential adverse impacts of the Project on the environment and people. The NTS and SEP will be published on Rengy Development (www.rengydevelopment.com.ua) and USELF (www.uself.ua) websites.

Printed copies of these documents will be available upon request from Rengy Sarata contact person (please see contact information in *Section 3.3* below).

The local population will be receiving timely information about planned construction activities, safety measures in the vicinity of the construction site, traffic management (where applicable), employment and business opportunities, and other relevant information. Publicly available information will also include summaries of annual project progress reports, incorporating environmental and social impacts, health and safety performance, and implementation of the external grievance mechanism.

Any public comments or complaints can be reported following the grievance procedure described in *Section 4* below.

3.2 Stakeholder Engagement Programme

A provisional Stakeholder Engagement Programme is provided in the *Table 3.1* below. This programme will be further discussed by the parties involved, and updated accordingly.

Table 3.1 Stakeholder Engagement Programme

No	Stakeholder	Activity	Means of Communication	Timeframe
Project Preparation Phase				
	All stakeholders	<ul style="list-style-type: none"> • Publish NTS (in English and Ukrainian) and inform all stakeholders; • Include applicable responses to comments and suggestions, which were not incorporated in the documents. 	<ul style="list-style-type: none"> • Local media publications; • Publications on web site; 	Before the start of construction
	Statutory stakeholders (regulatory agencies)	<ul style="list-style-type: none"> • Obtain all necessary permits for project construction 	<ul style="list-style-type: none"> • Official correspondence; • Meetings. 	Before the start of construction
	Construction contractors, temporary workers	<ul style="list-style-type: none"> • Agree construction related grievance management procedure and code of conduct for temporary workers; • Provide training to contractors on the code of conduct, or engage western contractors who adhere to best standards 	<ul style="list-style-type: none"> • Meetings; • Official correspondence; • Trainings. 	Before the start of construction
	Local population	<ul style="list-style-type: none"> • Provide information on safety measures during construction 	<ul style="list-style-type: none"> • Big boards at the construction site; 	Before the start of, and during

		<ul style="list-style-type: none"> (if applicable); Provide information on employment opportunities and opportunities for service provision; Provide information on construction related grievance procedure. 	<ul style="list-style-type: none"> Newspaper announcements (e.g. “Sharhorodschyna”); Web site announcements. 	construction
Construction Phase				
	All stakeholders	<ul style="list-style-type: none"> Provide information on processing and responding to grievances. 	<ul style="list-style-type: none"> Newspaper publications (e.g. “Sharhorodschyna”); Web site announcements (www.rengydevelopment.com.ua). 	Continuously during construction phase
	Construction contractors, temporary workers	<ul style="list-style-type: none"> Monitor the performance of contractors and their implementation of the agreed plans and procedures; Provide additional training as required. 	<ul style="list-style-type: none"> Meetings; Official correspondence; Trainings. 	Continuously during construction phase
	Local population	<ul style="list-style-type: none"> Collect and address any grievances. 	<ul style="list-style-type: none"> Official correspondence; Meetings. 	Continuously during construction phase
Operation Phase				
	All stakeholders	<ul style="list-style-type: none"> Ongoing interaction and cooperation with stakeholders. 	<ul style="list-style-type: none"> Web site announcements (www.rengydevelopment.com.ua); Meetings; Correspondence. 	Throughout the lifetime of the project.

3.3 Roles and Responsibilities

Mr Gennadiy Fedorovskiy, Company’s Director, will have the overall responsibility for handling the consultation and information disclosure, including organisation of consultation process, communication with identified stakeholder groups, collecting and processing comments/complaints, and responding to any such comments and complaints. Depending on the nature of a comment/complaint, some of them may be forwarded to the appropriate person in the company for a response.

Name of the person and title	Affiliation
Gennadiy Fedorovskiy, Director	Company: Rengy Sarata LLC Postal Address: Chervonoarmiyska Str.72A, 8th floor, Office 177, Kiev, 03680, UKRAINE Telephone: +38 044 585 9150 E-mail address: info@rengydevelopment.com.ua

4 Public Grievance Procedure

The objective of a grievance procedure is to ensure that all comments and complaints from any project stakeholder, including residents of nearby residential areas, Rengy Sarata employees, contractors' staff, local/regional authorities and other interested parties, are considered and addressed in an appropriate, consistent and timely manner. All grievances will be acknowledged and responded to within a reasonable timeframe.

Rengy Sarata will accept all comments and complaints associated with the project. A proposed template of a Comments and Complaints Form is shown in *Annex C*. The comments and complaints will be summarised and listed in a Complaints and Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate), and the date of response sent to the commenter/complainant. Any person or organisation may send comments and/or complaints in person or by post, email, or facsimile using the contact information specified in the Form.

All comments and complaints will be responded to either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will be reviewed and taken into account in the project preparation and implementation, however, they may not receive an individual response unless requested.

Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

All grievances will be registered and acknowledged within 7 working days and responded to within 20 working days. Rengy Sarata will keep a grievance log and report on grievance management, as part of annual project progress reports.

During construction, grievances in relation to construction activities will be managed by the construction general contractor. People may also submit their complaints via the local government representation in Shargorod Town.

Annexes

- Annex A Copies of Public Notice and Project Publications in Local Media
Annex B Protocol of the Public Meeting
Annex C Public Grievance Form

Form for public comments, complaints and reports

Reference No:	
Full Name:	
Contact Information and Preferred method of communication	By Post: Please provide mailing address: _____ _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	By Telephone: _____ By E-mail _____
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem? Etc.	
Date of Incident/Grievance	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature: _____	
Date: _____	
Please return this form to:	
<u>Gennadiy Fedorovskiy, Shargorod 2 Project Director</u> Company: Rengy Sarata Postal Address: 72A Chervonoarmeiskaya Street, Kiev, 03680, Ukraine Telephone: +38 044 585 9150 E-mail address: info@rengydevelopment.com.ua	

