

Stakeholder Engagement Plan (SEP) for Green Agro Service

1 Introduction

1.1 Background

Private company Green Agro Service has approached the European Bank for Reconstruction and Development (EBRD) for financing construction of a solar power plant in Vinnitsa Oblast of Ukraine. The project is thus subject to EBRD's 2008 Environmental and Social Policy and has been determined as a Category B project. Company has conducted an environmental and social due diligence assessment of the project and developed 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 projects, as well as to achieving enhanced community benefits. To meet 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

Green Agro Service is privately-owned company based in Porogi village, Vinnitsa Oblast. The company has initiated this project to construct a solar power plant with 4.5 megawatt installed capacity in the vicinity of Porogi village. The plant will operate on solar energy, converting it to electricity with an annual output of 5.369 million kilowatt-hours. Electricity generated at the solar plant will be connected to the 110 kV distribution grid via a 110/35/10kV substation and 100m long of 10 kV aerial transmission line, and will be sold to the grid at the feed-in tariff under the "Green Tariff Law".

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 2008, 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 2008 (<http://www.ebrd.com/downloads/about/sustainability/2008policy.pdf>)

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, Green Agro Service 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

Green Agro Service has already informed the general public about the project via publications on local announcement boards and public places (copies of selected publications are attached in *Annex A*). The company has also held a public consultation meeting in Porogi village on 24.11.2011, as part of construction permitting process. A protocol of this meeting is attached in *Annex B*.

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

Finally, the project approval process involves permit applications to various regulatory agencies, the process that is currently underway.

1.5 SEP Objectives

This SEP has been developed with the aim of describing how Green Agro Service 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 Green Agro Service's attention.

2 Stakeholder Identification and Assessment

In order to define a communication process in line with EBRD PR10, Green Agro Service, 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 Green Agro Service'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 trade 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 Green Agro Service, as the project progresses.

Table 2.1 Project Stakeholders

No	Name of Stakeholder	Description	Contact Person	Contact Details
Internal				
1	Employees	Green Agro Service employees involved in, or affected by the Project	Fedorovskiy G.V., Director Vetoshkin D.V., Project Manager	Address: Vinnitsa city, 14A, Voinov Internatsionalistov str, 2 nd floor, Phone: 0432 508 380 E-mail: info@rengydevelopment.com.ua
2	Martifer Solar UA	General EPC contractor of the project	Francisco Queiros Director Joao Martinho Project Manager	Address: Kyiv city, 23A Yaroslaviv Val, 2 nd floor, 01054 Phone: 044 428 94 44 joao.martinho@martifer.com
3	Podilskiy Energoconsulting	Planning and engineering subcontractor	Shakalov S. Director	Address: Vinnitsa city, 20, Kotsyubinskoho street, 21011 Phone: 044 428 94 44 joao.martinho@martifer.com
Local residents				
4	Residents of the Porogi Village	Local residents that are most likely to be affected		
5	Residents of Yampil Town	Residents of the nearest town		
Government and regulatory authorities				
6	Porogi village council Porogi territorial communities Porogi municipal company "Bereginya"	Local government	Zhereb L.V., Head of village council	Address: Vinnitsa Oblast Yampol district, Porogi village 29, Lenina Str. Phone: +380 4336 2 57 45
7	Yampil District Administration	District government	Voloshin V.A., Head of Yampol District Administration	Address: Vinnitsa Oblast Yampol town, 132, Lenina Str. Phone: +380 4336 2 14 63
8	Vinnitsa Oblast Administration	Regional government	Movchan I.V. Deputy Head of Oblast Administration	Address: Vinnitsa city, 70, Soborna str., Phone: +380 432 59 21 10
9	Management planning and architecture department of Vinnitsa Oblast Administration	Regulatory authority	Tsarenko S.A., Head of department	Address: Vinnitsa city 14, Teatralnaya str. Phone: +380 432 67 09 30
10	State Committee of Yampol district of Vinnitsa Oblast	Regulatory authority	Yupin S.I. performing duties of chief of State Committee	Address: Vinnitsa Oblast Yampol town, 132, Lenina Str. Phone: +380 04336 2 14 82
11	Department of Culture and Tourism of Vinnitsa Oblast Administration	Regulatory authority	Skripnik M.V. Head	Address: Vinnitsa town 14, Khmel'nitskoe highway Phone: +380 432 66-11-93
12	General Directorate of Environment of Vinnitsa Oblast Administration	Regulatory authority	Krysko V.G. Head of State Department of Environmental Protection of Oblast	Address: Vinnitsa city 19, 600 years str. Phone: +380 432 51-32-05
Other				

13	“VinnitsaOblenergo”	Regional electricity company	Kasich U.P. Technical Director	Address: Vinnitsa town 1-Travnia street, bld 2, Phone: +380432 52-50-01
14	Neighboring property owners and landusers	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

In addition, assisted by consultants, Green Agro Service 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 local population will be receiving timely information about planned construction activities, safety measures in the vicinity of the construction site, traffic management, employment and business opportunities and other relevant information through the local media listed in the table above. Publicly shared 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 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), as well as Statement on Environmental Consequences (in Ukrainian), and inform all stakeholders through local media; • Include 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; 	Sep-Oct 2012
	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. 	May-Sep 2012
	Construction contractors,	<ul style="list-style-type: none"> • Agree construction related grievance management 	<ul style="list-style-type: none"> • Meetings; • Official correspondence; 	Jun-Aug 2012

	temporary workers	<p>procedure and code of conduct for temporary workers;</p> <ul style="list-style-type: none"> • Provide training to contractors on the code of conduct. 	<ul style="list-style-type: none"> • Trainings. 	
	Local population	<ul style="list-style-type: none"> • Provide information on safety measures and traffic management procedures during construction; • Provide information on employment opportunities and opportunities for service provision; • Provide information on construction related grievance procedure. 	<ul style="list-style-type: none"> • Big boards at the construction site; • Newspaper announcements (e.g. "Yampil'ski Visti"); • Web site announcements. 	Before the start of, and during 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. "Yampil'ski Visti"); • 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, Green Agro Service'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	<p>Company: Green Agro Service Postal Address: 14A, Voinov Internatsionalistov str, 2nd floor, Telephone: 0432 508 380 E-mail address: info@rengydevelopment.com.ua</p>

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, Green Agro Service 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.

Green Agro Service 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. Green Agro Service 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 Green Agro Service and their construction contractor. People may also submit their complaints via the local government representation in Yampil Town or Porogi Village.

Appendices

Appendix A Copies of Project Publications in Local Media

Appendix B Protocol of the Public Meeting

Appendix C Public Grievance Form

Form for public comments, complaints and reports

Reference No:	
Full Name:	
Contact Information and Preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ 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:

Gennadiy Fedorovskiy, Porogi Project Director

Company: Green Agro Service LLC

Postal Address: 14A, Voinov Internatsionalistov str, 2nd floor,

Telephone: 0432 508 380

E-mail address: info@rengydevelopment.com.ua