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UZBEKISTAN: KARAKALPAKSTAN AND HOREZM SOLID WASTE MANAGEMENT - FEASIBILITY STUDY

STAKEHOLDER ENGAGEMENT PLAN (SEP) FOR
HOREZM REGION

Contract ID No. C43176/11619/71786



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LIST OF ABBREVIATIONS

CAS	Civic amenity site
Draft EIS	Draft Environmental Impact Statement
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
ESA	Environmental and Social Assessment
FS	Feasibility Study
GosKomEkologiya	State Committee of the Republic of Uzbekistan on Ecology and Environmental Protection
ha	Hectare
HR	Horezm Region
LLC	Limited liability company
Ltd	Limited company
m ³	cubic metre
MCA	Mahalla citizens assembly
MSW	Municipal solid waste
NGO	Non-governmental organisation
NTS	Non-technical Summary
ObiKomEkologiya	Committee on Ecology and Environmental Protection of the Horezm Region
OHL	Overhead transmission line
PNA	Protected natural area
PR	Performance Requirement of EBRD
RoU	Republic of Uzbekistan
RTA	Road Traffic Accident
SEC	Statement of Environmental Consequences
SEP	Stakeholder Engagement Plan
SER	State Environmental Review
SMS	Short Message Service
SPZ	Sanitary Protection Zone
SUE	State Unitary Enterprise
USD	US dollar
VCA	Village citizens assembly
WCS	Waste collection station
WSP	Waste sorting plant
TS	Transfer station

TABLE OF CONTENTS

1. INTRODUCTION	6
2. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE REQUIREMENTS	6
2.1. RoU legislation requirements.....	7
2.2. EBRD requirements.....	7
3. PROJECT DESCRIPTION.....	8
4. COMPANY'S STAKEHOLDER ENGAGEMENT EXPERIENCE	11
4.1. Company's stakeholder engagement organisation practice	11
4.2. Company's stakeholder engagement experience in the framework of the Project development.....	12
5. STAKEHOLDER IDENTIFICATION AND ANALYSIS	13
5.1. Stakeholder identification methodology	14
5.2. Key stakeholder categories and groups.....	14
5.3. Stakeholder analysis	16
6. STAKEHOLDER ENGAGEMENT PROGRAMME	24
7. GRIEVANCE MECHANISM.....	32
8. MONITORING, ASSESSMENT, AND REPORTING.....	33
APPENDIX 1. SAMPLE GRIEVANCE FORM	34

LIST OF TABLES AND FIGURES

Table 1. Potentially affected stakeholders and analysis of their interests / attitudes towards the Project	17
Table 2. Other stakeholders and analysis of their interests / attitudes towards the Project.....	21
Table 3. Stakeholder Engagement Programme	25
Figure 1. Location of the Project's facilities and the proposed scheme of the collected MSW transportation.....	10
Figure 2. Contact details of Toza Hudud SUE on a waste truck	12

1. INTRODUCTION

The Republic of Uzbekistan (RoU) has approached the European Bank for Reconstruction and Development (“EBRD” or “the Bank”) with a request to participate in financing the modernization of the municipal solid waste (MSW) management infrastructure in the Horezm Region (HR) (“the Project”). The volume of the proposed investments is 47.9 million USD in the form of sovereign loans.

These funds are planned to be spent on the construction of new MSW sanitary landfills (compliant with EU standards), waste transfer stations (TSs) and civic amenity sites (CASs), purchase of the necessary equipment, special vehicles and machinery for these facilities, as well as construction/reconstruction of roads connecting the proposed landfill sites with the large motor roads. The mentioned Project components will be designed in line with the national legislation and EU requirements.

The Project will be implemented by the State Committee of the RoU for Ecology and Environmental Protection (GosKomEkologiya). Toza Hudud SUE in the HR (Toza Hudud SUE or “the Company”), responsible for MSW collection, transportation and disposal in almost the whole region, will provide local technical support to GosKomEkologiya and will be the owner of the Project facilities.

The feasibility study (FS) for the Project is being developed by CECT Consulting, inženiring in svetovanje d.o.o. (Slovenia). Ecoline International Ltd. (Bulgaria) (“the Consultant”) addresses environmental and social (E&S) issues within the FS development.

The Consultant has completed the E&S classification of the Project components in accordance with the EBRD's E&S Policy (2014). As agreed with the Bank, all proposed facilities were categorised ‘B’. In this regard, the E&S Audit of the current Company’s operations, as well as the E&S Assessment (ESA) of the Project were conducted. This **Stakeholder Engagement Plan (SEP)** has been developed as part of the ESA.

This SEP has been prepared in accordance with the applicable requirements of the EBRD and the national legislation. It presents the Company's systematic approach to organising stakeholder engagement during both the Project design development and the Project implementation.

The SEP is a “living” document and should be regularly reviewed, supplemented, and / or amended as the Project evolves. This SEP as well as its subsequent editions will be disclosed so that all the stakeholders can get familiar with this document.

Restrictions influencing the Company’s stakeholder engagement due to the COVID-19 pandemic

Restrictions related to the COVID-19 pandemic, primarily social distancing measures, may force not to use some approaches to stakeholder engagement and consultations. This may lead to the exclusion of certain groups from the engagement process, for example, those who do not have access to the Internet or mobile communications. GosKomEkologiya should consult with the Ministry of Health of the RoU and its territorial branches regarding the implementation of stakeholder engagement (in accordance with the requirements of national legislation and the EBRD). This SEP proposes some alternative methods for stakeholder engagement in the context of the COVID-19 pandemic (**Table 3**).

2. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE REQUIREMENTS

The Project-related stakeholder engagement will be carried out in accordance with the applicable requirements of the Bank and the RoU legislation. These requirements are briefly described below.

2.1. RoU legislation requirements

At present, the main regulatory legal acts of the RoU governing stakeholder engagement during the development of project design documentation are:

- The Law of the RoU on Environmental Expertise of 25 May 2000 No. 73-II;
- The Resolution of the Cabinet of Ministers of the RoU on Further Improvement of the Mechanism for Environmental Impact Assessment of 7 September 2020 No. 541.

The Law of the RoU on Environmental Expertise defines environmental expertise as establishing the compliance of the planned activity with environmental requirements and the admissibility of the implementation of the object of environmental expertise. Environmental expertise is carried out in the form of state and public environmental expertise, as well as environmental audit (Article 4). The objects of the state environmental review (SER) are pre-project and project documentation justifying economic activity. Based on the results of the SER, a conclusion is drawn up regarding the admissibility of the implementation of the SER object. Implementation of the project without SER approval is prohibited.

Article 6 of the law establishes requirements for the information disclosure on planned activities as part of the environmental expertise procedure: *“Customers of environmental expertise can publish an announcement in the media about its implementation. In this case, information on its results is published within a month from the date of completion of the environmental expertise”*. The list of objects for which the announcement of the SER and the publication of information about its results in mass media is mandatory is currently not defined in the legislation. Thus, when conducting an SER, the decision to disclose information about the planned activity remains at the discretion of the customer.

The list of planned economic activities subject to SER comprising four categories (by environmental impact of the proposed production facilities) is provided in **Annex 1** to the **Resolution of the Cabinet of Ministers of the RoU of 7 September 2020 No. 541**. **Annex 2** to the Resolution includes requirements to the environmental impact assessment (EIA) materials, which should be prepared for proposed facilities of Category I, II and III from Annex 1. This annex also defines stages of the EIA procedure including development of the 1) Draft Environmental Impact Statement (Draft EIS); 2) Environmental Impact Statement (EIS), and 3) Statement of Environmental Consequences (SEC). An EIS and SEC are developed when the SER of the Draft EIS have identified the need for conducting additional surveys, special laboratory analyses, and developing reasoned environmental protection measures (para. 24b). According to Annex 2, the EIS should include “positive conclusion of public hearings, information on how suggestions and objections on the project received during the public hearings are addressed” (para. 24b). The SEC should report on revisions to the project solutions and actions taken to address suggestions on the project received during public hearings (para. 25). **Annex 3** to the Resolution defines the order for public hearings for the proposed activities subject to SER. Public hearings to discuss the feasibility of any planned economic activity are required for proposed activities classified as Category I and II activities¹. District (city) executive authorities (khokimiyats) are the organisers of public hearings, and the costs associated with public hearings should be financed by the project developer or from other sources not prohibited by law. The procedure for holding public hearings, as well as the participants of the hearings and their responsibilities are described in Annex 3. The Resolution does not provide any additional instructions for public consultations on proposed Category III and IV activities.

2.2. EBRD requirements

All projects financed by EBRD shall be structured to meet the requirements of the EBRD [E&S Policy](#), which includes ten Performance Requirements (PRs) for key areas of E&S

¹ The proposed MSW landfills belong to Category I by environmental impact (high-risk facilities), and TSs and constructed/reconstructed roads belong to to Category III, and CASs, and CASs – to Category IV.

sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. This particular Project complies with the [EBRD E&S Policy of 2014](#). In addition, EBRD's [Independent Project Accountability Mechanism](#), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its E&S Policy and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

In order to ensure the most effective contact with all stakeholders, the engagement process should be initiated at the initial stages of the development of a category "B" project and continue throughout the entire project life cycle. Stakeholder engagement should include the following elements:

- Identification and analysis of stakeholders, including those that may be particularly or disproportionately affected due to their disadvantageous or vulnerable position, and the compilation of a stakeholder register;
- Planning for stakeholder engagement and the development of an SEP that provides for an ongoing process of stakeholder engagement throughout the project life-cycle;
- Disclosure of relevant information about the project in the language(s) of the local population in an accessible and culturally appropriate form;
- Creation and maintenance of a grievance mechanism that allows stakeholders to voice their concerns related to the project's activities, especially in the E&S sphere;
- Conducting meaningful consultations with stakeholders.

For the COVID-19 pandemic, the EBRD issued a briefing note to PR10 recommending the use of "*alternative methods of disclosure and stakeholder engagement*"²; in particular: more informative content on project websites, the use of brochures, newsletter distribution via e-mail and messaging applications (e.g. WhatsApp, Telegram), sharing information and receiving feedback on social networks (e.g. Facebook, Instagram), sharing information through mass media, and posting announcements on local information stands. Recommended stakeholder engagement methods include telephone and online surveys and questionnaires, online engagement through social media, engagement through employees living in the locations of the Project sites, and through television and radio broadcasts. This SEP takes into account the EBRD's recommendations and proposes alternative engagement methods (**Table 3**).

3. PROJECT DESCRIPTION

Regional Toza Hudud SUE and its district / city branches are in charge of the collection, transportation, and disposal of MSW in HR. To date, the Company's balance sheet includes:

- 9 out of 10 operating MSW landfills in HR³: in the Bagat, Gurlen, Koshkupy, Hazarasp, Khiva, Khanka, Shavat, Yangiaryk, and Yangibazar districts;
- 52 waste collection stations (WCSs) with containers for MSW collection;

² Stakeholder engagement (PR10) COVID-19 EBRD briefing note. <https://www.ebrd.com/documents/environment/ebrd-covid19-briefing-note-stakeholder-engagement.pdf?blobnocache=true>.

³ The largest solid waste landfill in HR, which is located in the Urgench District, is on the balance sheet of a private enterprise (URGENCH AVTO EKO TRANS LLC).

- Garages and workshops at the Company's district branches, where special vehicles and special equipment⁴ are serviced and repaired.

The preliminary E&S assessment of the Project⁵ showed that the activities of all existing MSW landfills in the region do not comply with the national rules and requirements for the arrangement and operation of landfills, nor do they comply with a number of E&S requirements of EBRD.

In accordance with the national **Strategy for MSW management in the RoU**⁶, the existing MSW landfills are subject to closure and remediation. New sanitary landfills and transfer stations will be built that meet both national and international requirements. The Project is aimed at implementing the Strategy's objectives in the HR, and envisions the construction of:

- **two new landfills** on specially allocated land plots (in the Koshkuyr District within the Amirkum Massif, Yevgir mahalla citizens assembly (MCA), and in the Bagat District on the territory of the Kumbodok (MCA)); at the site of each landfill, besides a residual waste deposition area, there will be a **waste sorting plant (WSP)**, a **composting site** for biodegradable waste, and a number of auxiliary facilities; at the Koshkuyr District Landfill it is also planned to locate a biological treatment facility for separately collected food waste and a small medical waste incinerator (with capacity of 700 per year);
- **six waste transfer stations (TSs)** in the Gurlen, Yangibazar, Khiva, Khanka, Yangiaryk, and Hazarasp districts, which are supposed to be located at the sites of the existing district landfills or on adjacent land plots;
- **two civic amenity sites (CASs)** in the southern part of the Tuprokkala District (until April 2020 – Hazarasp District), located on specially allocated land plots;
- **construction/reconstruction of roads to proposed MSW landfills** including i) construction of access roads to landfill sites, and ii) upgrade of existing public roads connecting areas of the landfill sites with key motor roads including upgrade of bridges across the irrigation/drainage channels.

The Project also provides for the purchase of both the necessary and special equipment and vehicles for these facilities.

The closure and remediation of existing MSW landfills, construction / reconstruction of other roads connecting the Project facilities (not covered by Project investments), site preparation works for TSs to be located at the existing landfills⁷, and construction of new overhead transmission lines (OHLs) to the sites of Project facilities are considered as **associated projects**. They are not part of the Project and will be financed from the state budget and coordinated by GosKomEkologiya. However, they are subject to the EBRD's E&S requirements.

The locations of the Project facilities and the proposed scheme for MSW transportation are presented below (**Figure 1**).

It is assumed that mixed MSW accumulated at waste collection stations (WCSs) in urban areas and by the rural households will be transported to the TSs by waste trucks with a capacity of 7 m³. At the TSs, the waste will be loaded into 60m³ containers and delivered to the landfill sites. Waste collected from settlements located in the immediate vicinity of the

⁴ Waste trucks, bulldozers, loaders, etc.

⁵ Ecoline International Ltd. Solid Waste Management Infrastructure Modernisation Project, the Republic of Karakalpakstan and Khorezm Region (Uzbekistan). Environmental and Social Scoping Study. Final report, May 2019.

⁶ Resolution of the President of the RoU of 17 April 2019 No. PP-4291 on Approval of the Strategy for MSW management in the RoU for the period 2019-2028. <https://lex.uz/docs/4291733?query=%D0%BF%D0%BB%D0%B0%D1%81%D1%82%D0%B8%D0%BA>

⁷ Site preparation works for these TSs will include: 1) dismantling of redundant buildings and structures, 2) removal of accumulated waste, and 3) earth works for levelling the sites.

landfills will be delivered to the landfill sites directly. CASs are planned to receive MSW (presumably, mixed waste) from the population of nearby settlements. Waste accumulated at CASs will be transported to the Bagat District Landfill or to the nearest TS in the Hazarasp District.

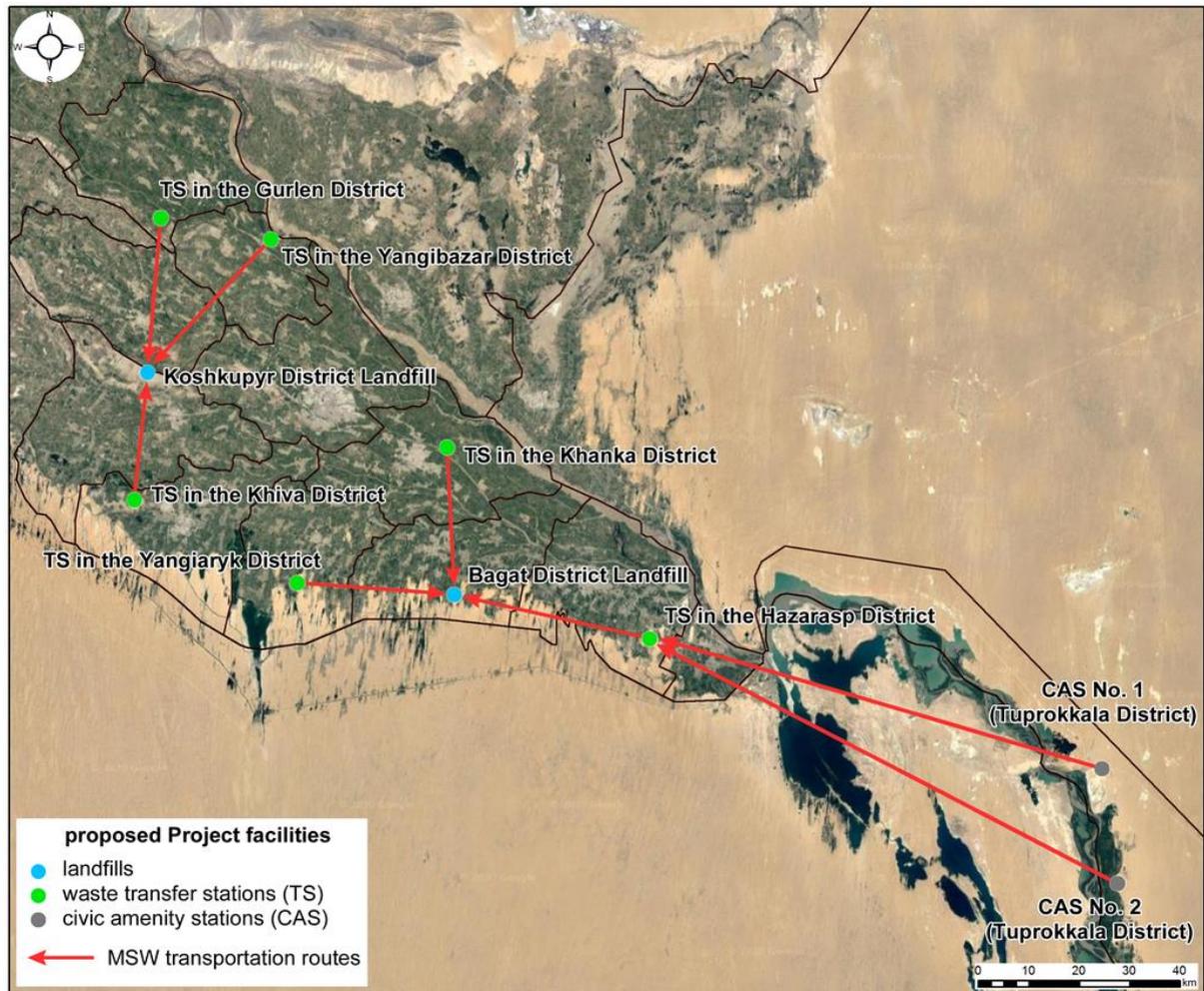


Figure 1. Location of the Project’s facilities and the proposed scheme of the collected MSW transportation

A distinctive feature of the proposed MSW landfills is its design as an integrated facility: a WSP, a composting site, and a residual waste disposal area will be located within one site. Residual waste will be disposed of at a designated area consisting of several cells. The residual waste deposition area will be expanded in stages, and the service life of each cell is approximately five years.

Auxiliary facilities for the proposed MSW landfills will include an administrative building for personnel, a weight bridge, a wheel washing and disinfection station, a water well (for service water supply), a shed for special vehicles, workshops, and an electrical substation. The sites will be also equipped with systems to manage landfill leachate, to collect and treat surface runoff, and control fires. Quality of surface and groundwater in the vicinity of landfill sites’ will be monitored.

The selection of sites for the proposed landfills in the HR was carried out in several stages and included analysis of siting alternatives. The presence of sensitive receptors (residential areas/houses, water bodies and water courses, and protected natural areas) within the proposed sites and their surroundings were considered when analysing the alternatives. As a result, the landfills were located so that their normative (maximally assumed) sanitary-protection zones (SPZs) would not contain any residential dwellings. The land allocation

materials were reviewed and approved by the competent authorities including those responsible for environmental protection and sanitary and epidemiological welfare.

According to preliminary estimates, the Project's land needs include a) 26.8 ha for the Koshkupy District Landfill and 15.5 ha for the Bagat District Landfill, b) from 0.5 to 1.0 ha for TSs, and c) about 0.25 ha for each of the CASs, d) less than 0.5 ha for the entrance roads to the landfills. Minor land allocation or easements might be required for the reconstruction of the access roads to the landfills.

For the construction of the MSW landfills and CASs, land plots were allocated by the decisions of the khokims of the respective districts. The land plots allocated for the landfills are sufficient for accommodating two cells for residual waste disposal at each landfill that are proposed to be financed via the EBRD loan. In order to construct third cells and thus to provide for a 15-year estimated service life of both landfills, about 0.5 ha should be added to the proposed site for the Bagat District Landfill in the nearest future. This would help avoid economic and physical displacement impacts on the local population later on.

The land acquisition for the TSs has not been completed, but most (4 out of 6) TSs will be located at the sites of the existing landfills operated by the Company, and their construction would not require new land acquisition.

The tender process for design and build contracts is expected to commence in late 2022 – early 2023; construction works will indicatively start in the second half of 2023 subject to successful procurement of the above contracts and following completion of detailed design. The duration of the construction stage will be 2-3 years.

The estimated service life of the proposed Koshkupy District Landfill and Bagat District Landfill will be 16.4 and 15 years, respectively.

The estimated need for **labour resources at the construction stage** is as follows (no inflow of labour force from abroad or other regions of the country is expected): a) around 40 jobs, including 16 drivers of special vehicles and 28 construction workers, in 2023, when the construction of the MSW landfills commences, b) a total of around 110-140 jobs, including 10-25 management and office personnel, 30-35 special vehicle drivers and about 70-80 construction workers, when the construction of the MSW landfills continues being coupled with the construction of the TSs, CASs and entrance roads, as well as with the reconstruction of the access roads to the landfills. The number of construction staff will be defined precisely at the stage of technical design and selection of construction contractor(s).

During operations, the implementation of the Project will result in creation of ca. 220 new jobs for men and women with different levels of education, incl. 150-160 positions at the two newly built MSW landfills and about 30 positions at the TSs and CASs (excluding drivers). The remaining 30-40 positions will be opened for drivers of special vehicles and special equipment. To the maximum extent possible, it is planned to employ the staff from district branches of Toza Hudud SUE whose jobs will be slashed as a result of the closure of the existing Company's landfills.

4. COMPANY'S STAKEHOLDER ENGAGEMENT EXPERIENCE

4.1. Company's stakeholder engagement organisation practice

Toza Hudud SUE has not previously carried out the formal identification of stakeholders, i.e. all groups that the Company interacts with in the course of its activities or that may be influenced by its activities. The Company engages with stakeholders within the framework of the current legislation, namely, it engages with regulatory authorities, contractors, suppliers, and subscribers.

The Company has a permanent channel of communication for the public to address waste collection issues. Each waste truck displays the telephone number of the regional branch that serves the specific area (**Figure 2**). Any resident can call this number with complaints or

questions about the work of the Company. The Company has developed a job description for a public relations specialist, which outlines the procedure for receiving appeals from the public. The dispatcher functions as a public relations specialist. Each appeal is recorded in a special log. According to a representative of Toza Hudud SUE, the vast majority of complaints received from the public are related to the untimely transportation of waste. After receiving a complaint, the dispatcher sends a waste truck to the address at which the complaint was recorded. Employees of the Company address the complaint and send the Company a photo report on the work done through the Telegram messenger. After that, the dispatcher calls the number from which the telephone call was received in order to report the elimination of the violation and make sure that everything was done correctly.

According to the Company's representatives, only one appeal was received regarding the operation of its existing landfills, it was received in 2018 and was related to operation of the existing landfill in the Bagat District⁸.



Figure 2. Contact details of Toza Hudud SUE on a waste truck

4.2. Company's stakeholder engagement experience in the framework of the Project development

According to the current RoU environmental legislation (**Section 2.1**), all projects entailing the construction of landfills and TSs require an EIA and subject to the SER procedure.

To date, Toza Hudud SUE has organised preparation of the EIA materials for the first stage of the EIA (Draft EISs) for the construction of the proposed Bagat District Landfill and Koshkupyrd District Landfill. For both landfill development projects information had not been disclosed and the consultations with stakeholders had not been carried out during the preparation of the Draft EISs (and at that time this was in line with the acting legislation)⁹. The

⁸ The farmer expressed concerns about the planned renovation of the existing landfill in the Bagat District as the expanded site of the facility was approaching his summer house (300 m from the boundary of the extended site) and fields, taking part of his land for the expansion. The Company investigated the complaint and found out that the farmer's summer house was an unauthorized development that had been built within the approved sanitary protection zone (SPZ) of the existing landfill (500 m) and was not used as a permanent residence. Since there is no private ownership of agricultural land in the RoU, the farmer does not have ownership of the land plot he uses. In this regard, Toza Hudud SUE did not consider it necessary to take any resettlement measures or to pay compensation.

⁹ Draft EISs for the construction of new Company's landfills were developed in March-April 2020. At that time, the Regulation on the State Environmental Review (introduced by Resolution of the Cabinet of Ministers of the RoU of 22 November 2018 No. 949) were in force. According to that Regulation, public hearings on the planned activities should be conducted on as needed basis. The decision on the need for public hearings for a particular project was made by SER authorities, and this decision was expressed in instructions included in the SER Conclusion on a pertinent Draft EIS. In this case, the EIS prepared at the next stage of the EIA procedure should

SER Conclusion on the Draft EIS of the planned MSW Landfill in the Bagat District points to the need for public hearings for this facility¹⁰. The SER Conclusion on the Draft EIS for the planned landfill in the Koshkupyrd District does not require public hearings for this facility.

It should be noted that the **design solutions described in the Draft EISs for proposed landfills are significantly different from those included in the bankable document - “Priority Investment Program and Project Implementation Plan” - for this Project**. The design solutions for MSW landfills are described for similar facilities; they do not include WSPs, composting sites for both landfills, as well as a food waste treatment facility and a medical waste incinerator planned at the Koshkupyrd District Landfill.

In line with the SER Conclusion for the planned Bagat District Landfill Draft EIS, on 5 October 2021, a public hearing was conducted in Mahalla Kumbodok, Mirishkor Village, Bagat District, in relation to this landfill’s EIS materials. It was attended by around 35 people. During the public hearing, the Bagat Landfill construction project was introduced to the local residents, including the planned activities, duration, and potential impacts. The questions and interests of the local residents revolved around two topics: 1) the number of future jobs, and the hope the new facility would employ the residents of this Mahalla (given high unemployment in the region), and 2) expectation for a possible improvement in the mahalla’s municipal infrastructure, specifically in local roads that were of poor state. In response to the first question, the representatives of the Company and the khokimiyat explained that residents of the Kumbodok mahalla would be hired on a priority basis; if the necessary specialists would not be found among the residents of the mahalla, they would be recruited from nearby settlements. To the second question, the representative of the khokimiyat replied that as part of the Project some roads and bridges within the mahalla would be rehabilitated and, where possible, other poor-state roads would be repaired, and quality of household infrastructure would be improved at the state budget’s expense (beyond the Project).

As of the early January 2022, Draft EISs for the Project’s TSs and CASs have not been prepared.

In general, the Company engages with stakeholders as part of its operations in line with the current RoU legislative requirements; however, the EBRD requires a more systematic approach to stakeholder engagement. The Company intends to implement this SEP to achieve compliance with EBRD PR10 and PR1.

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

EBRD PR10 requires the Company to identify and document all stakeholders, namely the various individuals or groups who are more or less likely to be affected (directly or indirectly) by the Project or may have an interest in the Project.

Stakeholder identification and analysis are essential for effective stakeholder engagement, and they are both a prerequisite for EBRD financing and a recommendation of international best practice. Stakeholder identification and analysis should be carried out by the Company on an ongoing basis including based on the results of public discussions and targeted consultations.

comprise “results of the public hearings”. However, this Regulation did not provide additional details on how and when public hearings and other public consultations should be carried out.

¹⁰ Conclusion of the State Environmental Review on Environmental Impact Assessment for Creation of the MSW Landfill of Toza Hudud SUE in the Bagat District of the Horezm Region (Draft EIS) No. 01-01/10-08-639 of 4 May 2020.

5.1. Stakeholder identification methodology

The identification of stakeholders in relation to the Project was carried out based on the following criteria:

- **Impact:** the implementation of the Project may significantly affect a certain social group (stakeholders);
- **Influence:** the social group is able to significantly influence the process of Project implementation;
- **Partnership:** there are opportunities for building partnerships between the Company and the given social group; and
- **Expressed Interest:** a social group or individuals not necessarily directly affected by the Project may (or may not) show interest in it.

There are **external and internal stakeholders** of the Project. Internal stakeholders include the Project proponent, investors, management of the Project beneficiary and its staff, and contractors and suppliers for the Project and its associated facilities. External stakeholders include all other groups and individuals who are affected by the Project and / or its associated facilities or who demonstrate interest to the Project. Special attention should be paid to the organisation of external stakeholder engagement as interaction between internal stakeholders regarding the Project is carried out on a routine basis in the course of Project implementation.

5.2. Key stakeholder categories and groups

This section provides a preliminary identification of the Project stakeholders for construction and operation stages. It should be noted that the process of stakeholder identification and analysis, as well as engagement, should continue throughout the entire lifecycle of the Project. Therefore, the list below is open and will be supplemented during the Project implementation.

The **potentially affected external stakeholders** are those on whom the Project implementation may have a direct impact; the following groups of external stakeholders are:

- A. residents of rural settlements located within the areas of direct impact of:
 1. Project facilities (MSW landfills, TSSs, CASs, and constructed/reconstructed roads to MSW landfills) (settlements in the vicinity of the Project sites) – relevant to Kumbodok Mahalla, Mirishkor Village of the Bagat District¹¹;
 2. roads used for Project-related transportation (settlements crossed by the roads used to transport construction materials, structures and machinery to the Project sites (during the construction stage) and MSW between the proposed MSW management facilities (during the operation stage) – the settlements are to be determined as the Project construction and operation routes have not been confirmed yet.
 3. associated facilities including a) roads and b) OHLs to be built / reconstructed to address the Project needs (the locations of a) and b) are yet to be determined), c) existing Company's MSW landfills to be closed and remediated: based on the available information sites of the existing Company's MSW landfills are at a considerable distance from the settlements (the minimal distance is 450 m between the operating Gurlen District Landfill and Chinabad Mahalla of Sholikor Village, Gurlen District. It is

¹¹ There is no residential development within the areas of direct impact under standard weather conditions for proposed MSW landfills, TSSs, and CASs. The area of the direct impact of the to-be-reconstructed section of the access road to the Bagat District Landfill includes several residential houses of Kumbodok Mahalla, Mirishkor Village.

expected that residents of the closest settlements will not be affected by emissions from special machinery and vehicles, noise and lighting at landfills during their remediation;

B. potentially affected neighbouring land users:

1. farmers whose agricultural land (arable land, pastures, and/or fish breeding ponds) falls into the SPZs of a) the *Project facilities*¹² (Koshkupy District Landfill (Yevgir MCA, Yangilik Village), Bagat District Landfill (Mirishkor Village, Kumbodok MCA), TS in Gurlen District (Sholikor Village, Chinabad MCA), TS in Khiva District (Dashek Village, Karakum Massif), TS in Khanka District (Amudarya Village), TS in Yangibazar District (Boshkirshikh Village, Zhaykhun MCA), TS in Yangiaryk District (Ostona Village, Korakuz MCA), TS in Hazarasp District (Yangibazar Village, Chorvador Massif), Civic amenity station No.1 (Tuprokkala District, Pitnyak City, Sarimay VCA), and Civic amenity station No. 2 (Tuprokkala District, Tuprokkala Village, Hazarasp Massif)) and b) *associated facilities* (i.e. the existing Company's landfills that are to be fully closed (Shavat District Landfill (Khurriyat Village, Uzunkul MCA), Bagat District Landfill (Besharyk Village, Obod MCA) and Koshkupy District Landfill (Katagon Village, Arablar MCA)) and six existing landfills on which or next to which the TSs are to be located);
 2. Protected natural areas (PNAs) located in the vicinity of the Project facilities and associated facilities (see **Table 1**); PNAs through which the routes of roads under construction/reconstruction and OHLs may pass (not defined yet).
- C. local self-government bodies: mahalla citizens assemblies (MCA), within the boundaries of which there are land plots allocated for the Project facilities (same administrative units as listed in point B.1. above') and associated facilities (undefined yet);
- D. Toza Hudud SUE's customers in the region: residents of settlements within the Company's service area, as expected in the future the service area would cover the entire region¹³, including: vulnerable groups of the population: the retired, disabled people, single women, families and people with low per capita income, and other socially vulnerable groups.
- E. Waste pickers / sorters: employees of Toza Hudud SUE practicing picking recyclable materials at Company's landfills and during MSW collection by a signal method (in rural areas)¹⁴, as well as official and informal workers of the Company's WCSs hired to clean and watch the WCSs.

¹² According to SanPiN No. 0350-17 Sanitary Norms and Rules for the Protection of Atmospheric Air in Populated Areas of the RoU, the size of the normative SPZ of the Project facilities is 500 m for the proposed landfills and 100 m for the TSs; it is assumed that a 100 m wide SPZ is also applicable for CASs.

¹³ At present, the landfills of Toza Hudud SUE accept waste for disposal from all HR administrative units excluding Urgench City and the Urgench District. Toza Hudud SUE collects and transports MSW from all administrative units excluding Urgench City, the Urgench District, and Khiva City. Waste generated in the territories of Urgench and the Urgench District is delivered to the MSW landfill in the Urgench District operated by URGANCH AVTO EKO TRANS LLC. Waste collection and transportation from the city of Khiva is carried out by Ekoklaster LLC, and this waste is disposed of at the existing MSW landfill in the Khiva District operated by the Company. Some small settlements in remote areas of the region are not covered by MSW collection, transportation, and disposal services. According to information from GosKomEkologiya, after the closure of the MSW landfill in the Urgench District (presumably in 2028), MSW produced in the Urgench City and the Urgench District will be directed to the Toza Hudud SUE's facilities: the proposed Koshkupy District Landfill and Urgench District TS (if a decision is made to build this TS).

¹⁴ According to a recent legal act on improvements in the waste management practices (Resolution of President of the RoU of 29 September 2020 No. PP-4845 available at <https://www.lex.uz/docs/5023690RUz>), since 1st January 2021 picking recyclables from MSW during MSW collection becomes illegal if conducted without the permission of the MSW management organisations. Therefore, picking recyclables by official and informal Company's WCS workers, by Toza Hudud SUE's staff engaged in waste collection by the signal method and, potentially, by Company's landfill workers may be classified as illegal by law since early 2021.

The following are identified among the **potentially affected internal parties**:

- Project 'owners':
 - GosKomEkologiya as Proponent and co-investor of the Project;
 - Toza Hudud SUE as Project beneficiary;
- Investors:
 - EBRD as a potential investor in the Project;
- Toza Hudud SUE's staff;
- potential contractors and suppliers for the Project and associated projects:
 - international consultants, national designers, and surveyors contracted to develop bankable documents, pre-design and Project documentation, as well as to conduct the necessary field studies,
 - construction firms that can be contracted for construction and installation works;
 - suppliers of materials and equipment for construction of the Project facilities and for the implementation of associated projects, etc.

Other stakeholders (those who are not directly affected by the Project but who may have an impact on or have expressed an interest in the Project) include:

- state authorities at the regional and local levels:
 - executive authorities (khokimiyats) of the region and districts / cities hosting Project and associated facilities;
 - Kengashes (councils) of people's deputies (of regional, district, and city level);
- competent authorities (regional and local subdivisions) supervising the Company's compliance with the national legislation requirements during development and approval of the Project documentation and during Project implementation;
- local businesses including small and medium-sized enterprises working on of MSW management and recycling:
 - private recycling companies;
 - private enterprises engaged in the collection, transportation, and / or disposal of MSW in HR.
- scientific, research, and educational organisations;
- national and regional non-governmental organisations (NGOs) of environmental and social orientation;
- national, regional, and local mass media.

5.3. **Stakeholder analysis**

The interests and / or attitudes towards the Project of the abovementioned stakeholder groups are analysed in this section.

Any stakeholder that is not included in the lists below (Table 1, Table 2) but wishes to receive information about the Project and E&S aspects of Toza Hudud SUE's operations can approach the Company (see Contacts in Section 7) with a request to be included in the stakeholders register.

5.3.1. **Potentially affected stakeholders**

According to the EBRD requirements, the greatest attention should be paid to the **potentially affected stakeholders**. Potentially affected stakeholders include both internal and external

stakeholders of the Project, and an analysis of their interests / attitudes towards the Project is presented in the table below (**Table 1**).

Table 1. Potentially affected stakeholders and analysis of their interests / attitudes towards the Project

Stakeholders	Interests / attitudes
Residents of settlements within areas of direct impact of the Project facilities	
<p>Residents of Kumbodok Mahalla of Mirishkor Village (Bagat District) (those whose houses are in the eastern edge of mahalla and nearby a to-be-reconstructed section of the access road to the Bagat District Landfill) including vulnerable groups:</p> <p>a) the elderly and people with chronic diseases,</p> <p>b) women (especially from low-income families) and low-income households¹⁵.</p> <p><i>Note:</i> according to the available information, other settlements are at a considerable distance from Project sites/routes and do not fall within the areas of direct impact of Project facilities both during construction and operation stages</p>	<ul style="list-style-type: none"> • May be potentially affected by: <ul style="list-style-type: none"> ○ Dust emissions and emissions from internal combustion engines of construction machinery at the landfill site and routes of the to-be-constructed entrance road and to-be-reconstructed access road (during the construction stage); ○ emissions from internal combustion engines of special machinery and vehicles, dust and bioaerosol emissions, emissions of volatile organic compounds from waste decay that result in unpleasant odours (during the operation stage in hot season); <p><i>Note:</i> emissions-related impacts will most likely manifest under adverse weather conditions (wind speeds over 10.8 m/s blowing towards the residential areas).</p> <ul style="list-style-type: none"> ○ noise from the operation of construction machinery at the landfill site and routes of the to-be-constructed entrance road and to-be-reconstructed access road (during the construction stage) and from the operation of special machinery at the landfill site (during operation stage); ○ permanent lighting at the landfill site (during hours of darkness); ○ potential accidental contamination of groundwater in the event of break of the impermeable bottom of landfill cells or wastewater reservoirs at the landfill site¹⁶; ○ visual impact related to creation of a growing waste pile on the residual waste deposition area (after Year 5 of the landfill operation). <ul style="list-style-type: none"> • May be interested in: <ul style="list-style-type: none"> ○ employment at the Project facilities during the construction and operation stages¹⁷; ○ receiving information about the Project and associated projects as well as their E&S impacts.
<p>Residents of settlements crossed or bypassed by roads to Project sites/routes (during the construction stage) and roads connecting CASs and TSs with proposed</p>	<ul style="list-style-type: none"> • May be affected by: <ul style="list-style-type: none"> ○ noise, vibration, emissions from internal combustion engines, lighting (during hours of darkness) from vehicles, an increase in the risk of road traffic

¹⁵ In rural communities in the Project area women housekeep and are responsible for providing their families with water for household and drinking needs. If groundwater quality would decrease as a result of the Project implementation, they will have to spend more resources on solving this problem (for example, they may have to buy drinking water / water purification means or bring water from afar).

¹⁶ The probability of such accidents is qualitatively assessed as low, and pertinent accidental impacts are considered as minor.

¹⁷ It is assumed that residents of settlements at a distance of up to 10 km from the sites of MSW landfills and up to 5 km from the sites of TSs and CASs, connected to the sites by roads, may be interested in employment at the Company's facilities (during the operation stage). The area of interest can be expanded if there is reliable public transport. Presumably, during the construction stage, the demand for local labour will be very limited.

Stakeholders	Interests / attitudes
<p>MSW landfills (during operation stage) including vulnerable groups:</p> <p>a) families with children especially schoolchildren, the elderly and people with disabilities living in settlements crossed or bypassed by the roads;</p> <p>b) the elderly and people with chronic diseases whose houses are next to the roads</p> <p><u>Note: the construction and operation routes have not been determined yet.</u></p>	<p>accidents (RTAs) involving the transport of the Company or contractors, increased frequency of congestion on the roads leading to settlements or the roads passing through settlements (during the Project's construction and operation stages);</p> <ul style="list-style-type: none"> ○ unpleasant odour from transported MSW (during the operation stage). ● May be interested in <ul style="list-style-type: none"> ○ employment at the Project MSW management facilities during the operation stage (applicable only to residents of settlements located relatively close to the facility sites)¹⁸; ○ receiving information about the Project and associated projects as well as their E&S impacts.
Residents of settlements within areas of direct influence of associated facilities	
<p>Residents of settlements in the vicinity of <i>existing Company's MSW landfills</i> that should be closed and remediated as a result of Project implementation - precautionarily accepted as relevant to Chinabad Mahalla of Sholikor Village in relation to the Gurlen District Landfill</p>	<ul style="list-style-type: none"> ● May be interested in <ul style="list-style-type: none"> ○ receiving information about the Project and associated projects, as well as their E&S impacts; ○ employment opportunities related to landfill remediation; ● May be affected by noise, vibration, lighting, and emissions from special vehicles and special equipment (from site remediation works)
<p>Residents of settlements crossed or bypassed by i) roads to be built / reconstructed to ensure Project needs (not covered by Project investments) and ii) proposed OHL routes to be constructed to ensure Project needs, including vulnerable groups:</p> <p>a) families with children especially schoolchildren, the elderly and people with disabilities living in settlements crossed or bypassed by the roads;</p> <p>b) the elderly and people with chronic diseases whose houses are next to the roads</p> <p><u>Note: the locations of i) and ii) are yet to be determined.</u></p>	<ul style="list-style-type: none"> ● May be affected by: <ul style="list-style-type: none"> ○ noise, vibration, lighting, and emissions from vehicles and construction machinery (during the construction stage) and from special vehicles transporting MSW (during the operation stages); ○ visual effects related to the construction of industrial facilities (mainly applies to OHLs); ○ an increase in the risk of RTAs and frequency of congestion on the roads leading to settlements or bypassing roads (during the construction and operation stages); ○ unpleasant odour from transported MSW (during the operation stage). ● May be interested in: <ul style="list-style-type: none"> ○ employment as construction workers at the construction / reconstruction sites for roads and OHLs; ○ receiving information about the Project and associated projects, as well as their E&S impacts.
Potentially affected neighbouring land users	
<p>Farmers whose agricultural lands are located within the areas of direct impact of Project facilities and associated facilities including facilities' SPZs.</p> <p><u>Note: The SPZs of the and proposed MSW landfills and existing MSW landfills (including those to host four proposed transfer stations) comprise cultivated farmer fields, a fish breeding pond, and</u></p>	<ul style="list-style-type: none"> ● May be affected by: <ul style="list-style-type: none"> ○ restrictions imposed by the SPZ regime on the range of agricultural products (ban on cultivation of food crops) (applicable to farmers whose land plots are within the SPZ of the proposed Bagat District Landfill); ○ reduction of the area where cultivation of food crops is prohibited by law) (applicable to farmers whose land plots are within the SPZs of the existing MSW landfills);

¹⁸ See the above footnote.

Stakeholders	Interests / attitudes
<p>several other ponds potentially suitable for fish breeding. Industrial (cotton) and fodder, as well as food crops (including rice, wheat, vegetables) are grown in the fields.</p>	<ul style="list-style-type: none"> ○ dust contamination of soil and noise related to construction/remediation works (applicable to farmers whose land plots are close to the Project and associated facilities' sites) and operation works (applicable to farmers whose land plots are within the SPZ of the Bagat District Landfill). ● May be interested in receiving information about the Project and associated projects, as well as their E&S impacts; ● Can be engaged as part of the Livelihood Restoration Framework and, if necessary, when developing the Livelihood Restoration Plan.
<p>PNAs in the vicinity of the Project facilities and associated facilities, as well as in the vicinity of roads connecting CASs and TSs with proposed MSW landfills, including:</p> <ul style="list-style-type: none"> ● Horezm National Nature Park¹⁹; ● Horezm State Forestry; ● Important Bird Area (IBA #UZ011). <p><i>Note:</i> the list should be updated when routes for transportation of Project goods and sites of the associated roads are identified (during the detailed design stage)</p>	<ul style="list-style-type: none"> ● The Project facilities and associated facilities close to the PNAs can be considered as sources of impact on protected wildlife species and unique ecosystems; ● May be interested in receiving information about the Project and associated projects, as well as their E&S impacts.
Local government bodies	
<p>MCAs that allocated / will allocate land plots for the Project facilities and associated facilities</p>	<ul style="list-style-type: none"> ● Heads of MCAs are a key source of information on the attitude of local residents towards the Project, their expectations and concerns, possible suggestions on changes in the Project solutions, as well as statistical information on socially vulnerable groups and residents of potentially affected settlements; ● Assist in organising public hearings within the EIA procedure and act as key participants during these public hearings; ● Potentially concerned by land acquisition (for the construction of MSW landfills, CASs, and TSs in the Yangiaryk and Hazarasp District, as well as new roads and OHLs), additional load on the existing infrastructure (primarily on the road network) during the construction stage and, possibly, during the operation stage; ● Benefit from the closure of waste disposal facilities not compliant with sanitary requirements; ● Interested in the timely receipt of information about the Project, its stages, and needs; ● Expect that when planning the Project activities the interests of other users of the local road infrastructure will be taken into account and that the Project will provide for the local road infrastructure's upgrade and rehabilitation.
Toza Hudud SUE 's customers	

¹⁹ The Horezm National Nature Park was formed by the Decree of the Government of the RoU of 14 December 2019 No. 1000 (<https://lex.uz/ru/docs/4646262/>). It consists of several sites located in Urgench, Khanka, Khiva, Tuprokkala, Hazarasp and Yangibazar districts. One of its Yangibazar District sites is in the vicinity of the proposed Yangibazar District TS, and three more sites – close to the access road to the proposed TS and the existing Yangibazar District MSW landfill.

Stakeholders	Interests / attitudes
Residents of settlements in the territories of the Company's service, in the future – the entire population of the region, including vulnerable groups of the population: retirees, disabled people, single mothers, large families, families / people with low income and other socially vulnerable groups	<ul style="list-style-type: none"> • May be affected by the increase in tariffs for the collection and transportation of MSW, associated with the need to repay the bank loan for the construction of the Project facilities; • Benefit from improving the environmental situation in the region (as a result of the closure of existing MSW landfills that do not meet sanitary requirements); • Interested in receiving information about the Project and E&S impacts from its facilities.
Waste pickers / sorters	
<ul style="list-style-type: none"> • Employees of Toza Hudud SUE who extract valuable components of recyclable materials at the existing MSW landfills; • staff and informal workers of Toza Hudud SUE's WCSs; 	<ul style="list-style-type: none"> • Lose income as a result of the inability to continue extracting valuable recyclable materials from mixed MSW: <ul style="list-style-type: none"> ○ at the Company's existing MSW landfills after their closure; it is assumed that such practices will not be possible at the Company's newly built MSW landfills; ○ during MSW collection by the signal method in the rural residential areas, ○ at the Company's WCSs in the urban residential areas. • The Project may prompt the Company to speed up official employment of those WCS workers who currently work unofficially in exchange for housing and do not have official salary; • Interested in information about the Project and its implementation stages.
Project 'owners'	
GosKomEkologiya	<ul style="list-style-type: none"> • Initiator and co-investor of the Project – interested in the effective implementation of the Project in accordance with the requirements of the national legislation and the EBRD.
Management of Toza Hudud SUE	<ul style="list-style-type: none"> • Interested in implementing the Project to raise funds for the modernization of the Company's landfills, as well as to increase the Company's income; • Interested in receiving in-depth information about the Project and its stages, performance indicators.
Project Investor	
EBRD	<ul style="list-style-type: none"> • Interested in the effective implementation of the Project in accordance with the requirements of the national legislation and the EBRD.
Toza Hudud SUE's employees	
Staff of Toza Hudud SUE, in general	<ul style="list-style-type: none"> • May expect an increase in wages, the improvement of working conditions at the MSW management facilities, and an increase in the prestige of work in the Company; • Interested in receiving information about the Project, its stages, and decisions on ensuring safe on-site working conditions; • May fear staff reductions as a result of the closure of existing MSW landfills.
Contractors and suppliers for the Project and associated projects	
Potential contractors and suppliers for the Project and associated projects	<ul style="list-style-type: none"> • Interested in performing consulting work, field research, construction, and installation works; the supply of equipment and building materials for the needs of the Project and associated facilities; and, as a result, in receiving income; • May decide to hire additional employees in connection with the conclusion of work / service contracts.

5.3.2. Other stakeholders

Table 2 below characterizes the interests / attitudes towards the Project of *other stakeholders* of the Project who are not directly affected by the Project but are able to influence it. These interests / attitudes are all related to *external stakeholders*.

Table 2. Other stakeholders and analysis of their interests / attitudes towards the Project

Stakeholders	Interests / attitudes
State authorities (national level)	
Uzbekistan Agency for Standardization, Metrology and Certification (Uzstandart Agency)	<ul style="list-style-type: none"> Define requirements to equipment and materials to be supplied for the Project and issue compliance certificates
Centre for State Environmental Review of the RoU	<ul style="list-style-type: none"> Conduct SER of projects for the construction of MSW landfills (impact category I projects) (SER Centre of the RoU); determine the scope of work on the EIA of the planned activity; Interested in receiving information about the Project, its E&S performance, the impacts and risks of the Project, and the current and planned activities of the Company.
Centre for Comprehensive Review of Projects and Import Contracts under the Ministry of Economy and Industry of the RoU	<ul style="list-style-type: none"> Conducts state review of pre-project and project documentation of investment and infrastructure projects included in state programs for regional development.
Investment Promotion Agency and the Centre for Development of Investment Projects under the Ministry of Investments and Foreign Trade	<ul style="list-style-type: none"> Interested in attracting foreign investment in the field of MSW recycling and creating joint ventures, possibly in the format of public-private partnerships with the involvement of local partners²⁰.
State authorities (regional and local level)	
Executive authorities: Khokimiyat of the HR and the khokimiyats of all districts and cities in the territories where Project facilities and associated facilities are located	<ul style="list-style-type: none"> Responsible for the execution of orders of the President of the RoU, approved strategic initiatives²¹, and any requests of GosKomEkologiya in connection with the Project; Manage properties of a region, district, and city; Expect existing problems to be resolved in the field of MSW management in the HR; Interested in increasing the investment attractiveness of the region as a whole and its individual districts; Expect an improvement in the ecological situation in the region and its districts due to the elimination of old landfills and the construction of modern landfills with minimal environmental impacts, as

²⁰ Agency for Attracting Foreign Investments under the Ministry of Investments and Foreign Trade. 2020. News. The second stage of negotiations with the Japanese company Gaina Pro. <https://invest.gov.uz/ru/mediacenter/news/the-second-stage-of-negotiations-with-the-japanese-company-gaina-pro/> (in Russian)

²¹ The project is being implemented within the framework of two strategic initiatives approved by the Resolutions of the President of the RoU: a) the State Programme for the Development of the Aral Sea Region for 2017-2021 and b) the Strategy for the Management of MSW in the RoU for the period 2019-2028 and the Action Plan for the Implementation of the Strategy for 2019-2020.

Stakeholders	Interests / attitudes
	<p>well as a reduction in the incidence of diseases in the region's population;</p> <ul style="list-style-type: none"> • Agree on various permits required for the implementation of the activities of Toza Hudud SUE and the implementation of the Project²², incl. making decisions on the allotment of land plots for the construction of new facilities in the district (district / city khokimiyat), holding tenders for the provision of sanitary cleaning services in the district / city (district / city khokimiyat); • Interested in receiving information about the Project and understanding the E&S indicators, impacts and risks of the Project, and the current and planned activities of the Company.
<p>Kengashes²³ of People's Deputies of the region and of districts and cities in the territories where Project facilities and associated facilities are located</p>	<ul style="list-style-type: none"> • Together with the khokims of the region / district / city, they resolve issues of planning, budgeting, property management of the region / district / city, use of land and other natural resources, nature protection, construction, etc.; • Interested in receiving information about the Project, its impact on the E&S indicators of settlements, the impacts and risks of the Project, and the current and planned activities of the Company.
<p>Government authorities, incl. supervision and control authorities (regional and their district / city branches)</p>	
<p>HR Department of Ecology and Environmental Protection (ObiKomEkologiya) and district/city Divisions of Ecology and Environmental Protection;</p> <p>HR Emergency Management Department, district/city Divisions of Emergency Management;</p> <p>HR Centre for Sanitary and Epidemiological Well-Being, district/city Centres for Sanitary and Epidemiological Well-Being;</p> <p>HR Department of Public Health, district Divisions of Public Health;</p> <p>HR Main Employment Department, district/city Centres for Population Employment Assistance (including State Labour Inspectors and district/city Centres for Population Employment Assistance);</p> <p>HR Department for Support of Mahallas and Families, district/city Divisions for Support of Mahallas and Families;</p> <p>HR Department of Culture, regional department of the Agency of Cultural Heritage under the RoU Ministry of Tourism and Sports,</p>	<ul style="list-style-type: none"> • Exercise control over the activities of Toza Hudud SUE and the compliance of its facilities with the requirements of national legislation; • Issue various permits required for the implementation of the activities of Toza Hudud SUE and the implementation of the Project (including land allocation ; • Interested in the compliance of Toza Hudud SUE with the E&S requirements of the legislation of the RoU; in the elimination or minimization of inconsistencies between the MSW management system and national legislation; • Expect an improvement in the ecological situation in the region and districts due to the elimination of old landfills and the construction of modern landfills with minimal environmental impacts, as well as a reduction in the incidence of diseases in the region's population; • Expect an improvement in the management of medical waste in the region; • Interested in receiving information about the Project and its E&S performance, impacts and risks of the Project, and the current and planned

²² The competence of Khokim of a district / city includes issues of planning, budgeting, property management of the district / city, use of land and other natural resources, nature protection, construction, etc. (article 25 of the Law of the RoU No. 913-XII of 2 September 1993 on Local Government Authority, <https://lex.uz/ru/docs/112168>).

²³ The Kengash of People's Deputies and the Khokim ensure the implementation of the tasks of social and economic development common for the region, district, and city; the implementation of laws, decisions of the chambers of the Oliy Majlis, and acts adopted by the President and the Cabinet of Ministers; etc. (article 1 of the Law of the RoU No. 913-XII of 2 September 1993 on Local Government Authority, <https://lex.uz/ru/docs/112168>).

Stakeholders	Interests / attitudes
district/city Divisions of Culture	activities of the Company.
HR Centre for State Environmental Review	<ul style="list-style-type: none"> • Conduct SER of construction of the proposed TSS and CASs (impact category III-IV projects), determine the scope of work on the EIA of the planned activity; • Interested in receiving information about the Project, its E&S performance, the impacts and risks of the Project, and the current and planned activities of the Company.
Local businesses incl. small and medium businesses in the field of MSW management	
Private recycling companies ²⁴	<ul style="list-style-type: none"> • Are potential consumers of the products of the proposed WSPs; • May be interested in organising waste collection at WCSs to increase the share of recycled waste; • Interested in receiving information about the Project, its stages, capacities of the proposed facilities, etc.
Private enterprises engaged in the collection, transportation, and / or disposal of MSW in the HR, including: <ul style="list-style-type: none"> • URGANCH AVTO EKO TRANS LLC, currently operating in the city of Urgench and the Urgench District; • Ekoklaster LLC, which won the tender for the collection and transportation of MSW from the territory of Khiva to the landfill of Toza Hudud SUE 	<ul style="list-style-type: none"> • Can supply waste to the Company's MSW landfills; • Compete with the Company for contracts on sanitary cleaning of the territories of regions / cities; • Interested in receiving information about the Project, its stages, the capacities of the proposed facilities, etc.
Foreign commercial companies specializing in the development of MSW recycling technologies	<ul style="list-style-type: none"> • Interested in the introduction of modern effective technologies for MSW recycling with the receipt of commercial products within the framework of the formation of joint ventures²⁵.
Non-profit organisations	
Scientific, research, and educational organisations (universities and schools)	<ul style="list-style-type: none"> • May be interested in receiving objective information about the state of the natural and social environment in the Project area and its changes during the Project implementation; • May be interested in the opportunities provided by the Project for environmental education of schoolchildren and students, e.g. the Project may demonstrate approaches to MSW management in line with good international practice (for example, through excursions to the proposed facilities), • May be interested in organising training programs for Company employees, incl. those related to the Project implementation; • May be interested in potential job opportunities for

²⁴ There is a number of small enterprises that process recyclable materials (glass, plastic, paper, and metal) or collect, prepare them and send to larger recycling plants in other regions. There are also plans to open new factories to recycle used tires and different types of plastic waste.

²⁵ Agency for Attracting Foreign Investments under the Ministry of Investments and Foreign Trade. 2020. News. The second stage of negotiations with the Japanese company Gaina Pro. <https://invest.gov.uz/ru/mediacenter/news/the-second-stage-of-negotiations-with-the-japanese-company-gaina-pro/> (in Russian)

Stakeholders	Interests / attitudes
	their graduates during construction and / or operation of the proposed facilities
<ul style="list-style-type: none"> National NGOs of environmental and public orientation, incl. Logos NGO, Ecosphere NGO, Women's Centre for Environmental Law, Regional Environmental Centre in Central Asia, etc.; Regional NGOs of environmental and public orientation: incl. Dono Children's Ecological Centre, Eco-Voha NGO, etc. <p><i>Note: the list of NGOs that may express interest in the Project, incl. those that represent the interests of ethnic minorities and socially vulnerable groups will be updated as needed during the later stages of the Project development and implementation</i></p>	<ul style="list-style-type: none"> May be interested in monitoring the progress of Project implementation and tracking if their opinions / suggestions on the Project are taken into account
<ul style="list-style-type: none"> National, regional, and local mass media 	<ul style="list-style-type: none"> May be interested in cooperating with the Company on coverage of Company's activities in the media as well as in informing the general public and other Project stakeholders.

6. STAKEHOLDER ENGAGEMENT PROGRAMME

The Stakeholder Engagement Programme (**Table 3**) is designed to ensure the most effective engagement with all identified stakeholders, to create and maintain respectful relations between the Company and stakeholders, and to prevent possible conflicts.

The Programme covers the design and construction stages of the proposed facilities (2022 – 2025) and should be revised and updated at least within one year after beginning of the construction stage and then prior to commissioning the Project facilities. It provides a specific action plan with the distribution of responsibilities and a timeline for implementation of the suggested activities. If there would be changes during the Project implementation that require modification of the engagement mechanisms and / or new stakeholders are identified, the Programme should also be updated.

In case of adverse circumstances (epidemic or pandemic), all events requiring gatherings / major meetings should, if possible, be conducted online using alternative engagement methods (see **Section 2.2** and the Stakeholder Engagement Programme below). The overall responsibility for the delivery of the Programme and the entire SEP rests with the Company²⁶.

²⁶ To ensure effective implementation of the SEP it is recommended to assign a person within the Company's management with a responsibility to manage SEP implementation. This responsible person should be supported by two assistants from the Company staff working on stakeholder engagement issues parttime. As the Company has limited experience in terms of stakeholder engagement, the staff that will be responsible for the SEP delivery and maintenance of the grievance mechanism should be trained on Bank's requirements on and approaches to stakeholder engagement.

Table 3. Stakeholder Engagement Programme

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
1.	Stakeholder engagement activities within the Project Development					
1.1.	<p>Prepare and disclose the required EIA materials for each Project facility:</p> <ul style="list-style-type: none"> for MSW landfills (Category I) for TSs (Category III) for CASs (Category IV) for roads to MSW landfills to be constructed/reconstructed (Category III (to be confirmed)) <p><i>Note: By national legislation, the disclosure of EIA materials is compulsory only for Category I facilities. However, the Company will disclose some EIA materials for Category III and IV facilities as well</i></p>	All stakeholders	<p>EIA Materials</p> <p>EISs, non-technical summaries (NTSs)</p> <p>Draft EISs, NTSs</p> <p>EIA Questionnaires / brief summary of the Questionnaires</p> <p>Draft EISs, NTSs (to be confirmed after assigning the impact category to each road)</p>	Design stage	Toza Hudud SUE	<p>Electronic versions of the EIA materials – to be disclosed at the official website of GosKomEkologiya (http://www.uznature.uz/yz/invest/51#2 and http://www.uznature.uz/yz/legislation/ondata?legislationCategoryId=9),</p> <p><i>For Category I facilities:</i> paper versions of the EIA materials – to be placed at the regional office and district branch offices of Toza Hudud SUE in Bagat and Koshkupy Districts and at heads of Kumbodok MCA of Mirishkor Village (for the Bagat District Landfill) and in Yevgir MCA of Yangilik Village (for the Koshkupy District Landfill).</p> <p>Notification on disclosure of EIA Materials – to be published at district/regional newspapers, TV news broadcasts, news web portals, at the GosKomEkologiya’s website, and at the official webpages of district khokimiyats</p>
1.2.	Collect and analyse comments and suggestions received from stakeholders on the disclosed EIA materials	All stakeholders	<p>Logs of received comments / suggestions</p> <p>Minutes of public hearings on proposed landfills</p> <p>Minutes of meetings with heads of MCAs</p>	<p>During the EIA procedures for the Project facilities.</p> <p>The findings of the analysis – to be included into regular reports for the EBRD</p>	Toza Hudud SUE	<p>Comments and suggestions on the EIA Materials – to be collected via: a) logs of received comments / suggestions at the places where paper versions of EIA Materials are disclosed, b) a dedicated email, c) Ask Question form at the GosKomEkologiya’s website</p>

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
1.3.	Hold public hearings on proposed construction of MSW landfills: <ul style="list-style-type: none"> Koshkupy District Landfil and Bagat District Landfill 	All stakeholders with focus on residents of the affected settlements	EISs, NTSs, notifications on the public hearings, Company's presentations for the public hearings based on NTSs (with a section on review of public comments and suggestions on the disclosed EIA Materials)	Design stage	Toza Hudud SUE, Koshkupy District Khokimiyat, Bagat District Khokimiyat	Notifications on the public hearings – to be posted at the official webpages of district khokimiyats, at district/regional newspapers, TV news broadcasts, news web portals, at the website of GosKomEkologiya Date – no later than 20 days before the date of the hearings
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>In agreement with GosKomEkologiya and taking into account the instructions of the Ministry of Health of the RoU, determine an alternative to hearings, for example, an electronic survey or an electronic discussion supported by paper copies of survey to allow stakeholders to submit comments</i>				
1.4.	Take into account the comments and suggestions on EISs of MSW landfills projects received from stakeholders	Stakeholders	EISs, NTSs, Protocols of the Public Hearings (on EIA Materials for MSW Landfill projects)	During the discussion of the EISs and revision of EISs before submission to SER	Toza Hudud SUE, SER Centre at GosKomEkologiya	
2.	Disclose information about the planned activities within the framework of the Project in the mass media, indicate contacts for feedback	Potentially affected and other stakeholders	Notifications, mass media information, press releases / bulletins as news become available	Within 1 month of the Loan Agreement becoming effective	Toza Hudud SUE	Information boards in offices of heads of MCAs/VCAs of potentially affected settlements (per lists A and B, Section 5.2), mass media, Internet-portals, the website of GosKomEkologiya

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
3.	Disclose the package of documents prepared as part of the bankable ESA	All stakeholders	SEP and NTS of the ESA Report, Livelihood Restoration Framework Livelihood Restoration Plan	Prior to the Loan Agreement signing A Livelihood Restoration Plan is to be developed and disclosed prior to the construction of the Project facilities	Toza Hudud SUE	Electronic versions of the documents – to be disclosed at the website of GosKomEkologiya. Paper versions of the documents – to be placed at the regional office of Toza Hudud SUE and its district branches, offices of heads of MCAs/VCA of potentially affected settlements (per lists A1 and B1 in Section 5.2), and in other potentially affected settlements due to construction and operation traffic (list A2 in Section 5.2) that will be determined as the Project progresses in consultations with OblKomEkologiya and district khokimiyats
4.	Within 30-60 days of disclosure of the above documents, undertake the following: <ul style="list-style-type: none"> for MSW landfills – public meeting and distribution of questionnaire to gather feedback from residents of affected settlements for TSs and CASs - conduct meetings with the "street heads" in the mahallas hosting the TSs and CASs and present project information 	All stakeholders with focus on residents of the affected settlements	SEP and NTS of the ESA Report, Livelihood Restoration Framework	As noted to the left	Toza Hudud SUE	Personal meetings
5.	Develop a set of Frequently Asked Questions and Answers regarding the Project	All stakeholders	FAQ documents	Prior to the Loan Agreement signing	Toza Hudud SUE	Paper versions of the document – to be placed at the offices of Toza Hudud SUE and its district branches, offices of heads of MCAs/VCA of potentially affected settlements (lists A1 and B1 in Section 5.2)

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
6.	Ensure the availability of/access to sample grievance and suggestion forms	Local residents and any stakeholders	Sample forms for filing grievances	With disclosure of the SEP	Toza Hudud SUE, contractors	Public Visitor Centres at the offices of Toza Hudud SUE and its district branches Offices of the heads of MCAs/VCA of potentially affected settlements (lists A1 and B1 in Section 5.2)
7.	Open Public Visitor Centres for the implementation of the Project in each district and publish information about their opening	Stakeholders	SEP, NTS, Livelihood Restoration Framework, maps / information about the Project	Within 1 month of the Loan Agreement becoming effective – for the construction period	Toza Hudud SUE	Offices of Toza Hudud SUE and its district branches where the Project facilities are located (lists A1 and B1 in Section 5.2)
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>It is possible to launch a hotline and provide any requested information via WhatsApp / Telegram chat, Facebook / Twitter, posting on the Project / Company website</i>				
8.	Hold meetings with heads of MCAs potentially affected transportation of construction materials and transportation of MSW	Heads of MCAs of settlements crossed by roads used for transporting construction materials and transportation of MSW from CASs to TSs and from TSs to landfills	NTSs for proposed MSW Landfills and for proposed TSs, presentations prepared on their basis	Upon development of schemes for goods transportation for the Project	Toza Hudud SUE	Offices of heads of MCAs/VCA of potentially affected settlements (the list – to be clarified) (point A2 in Section 5.2)
9.	Disclose and implement the grievance mechanism (see Section 7) and publish the contact details of the person responsible for its implementation on the official website of the GosKomEkologiya	Potentially affected groups Stakeholders	Notification, information bulletins	Disclose and start implementing at the design stage and maintain throughout the Project	Toza Hudud SUE	GosKomEkologiya's website, offices of Toza Hudud SUE and its district branches, offices of heads of MCAs/VCA of potentially affected settlements (per lists A and B in Section 5.2)

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
10.	Appoint a person at the regional office and assistants at the district branches who will be responsible for the implementation of the SEP and grievance mechanism.	Stakeholders	Notification, information announcement	Within 1 month of the Loan Agreement becoming effective	Toza Hudud SUE	GosKomEkologiya's website, offices of Toza Hudud SUE and its district branches
11.	Organisation of round tables, briefings, on-line conferences, and presentations with the participation of representatives of the EBRD, GosKomEkologiya, Regional and District Khokimiyats	Stakeholders	A package of documents on bankable ESIA, and national design documents, EIS, SEC	Before the start of construction work and, as necessary, before the operation stage	GosKom-Ekologiya Toza Hudud SUE	Offices of the Regional and District Khokimiyats (where needed), GosKomEkologiya's office
12.	Conduct focused consultations with affected parties and / or individuals (e.g. potentially affected farmers)	Potentially affected stakeholders	Information about the planned activity	Identification of affected individuals – early in the Livelihood Restoration Plan development; basic consultations – before the start of construction work, then when necessary (for example, as part of the implementation of livelihood restoration measures)	Toza Hudud SUE	Potentially affected land or assets users / owners (per list B in Section 5.2), offices of Toza Hudud SUE and its district branches

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
13.	Notify about the start of construction work in the framework of the Project	Affected and other stakeholders	Notification, information bulletins	At least one month before the start of construction works	Toza Hudud SUE, contractors	GosKomEkologiya's website, information boards in potentially affected settlements (lists A1 and B1 in Section 5.2), at construction sites of the Project facilities and / or in the offices of heads of MCAs/VCAs of potentially affected settlements (lists A1 and B1 in Section 5.2)
14.	Conduct information presentations / trainings on MSW management	Local residents, schools	Presentation materials	For the first time – within 12 months of the Loan Agreement becoming effective, then once a year	Toza Hudud SUE, Centre for sanitary treatment	Potentially affected settlements (lists A1 and B1 in Section 5.2), public visitor centres at the offices of Toza Hudud SUE and its district branches, GosKomEkologiya's website
15.	Inform the population beforehand about the transportation routes and train them on road safety requirements for the period of construction and operations work	Local residents, school-children	Presentation materials	At least one month Before the start of construction works; prior to operations	Toza Hudud SUE, Traffic Safety Authorities	Offices of the heads of MCAs of potentially affected settlements/ schools (list A2 in Section 5.2), GosKomEkologiya's website
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>Distribute training materials via e-mail, phone calls, social networks: WhatsApp / Telegram chat, Facebook / Twitter, Project / Company website</i>				
16.	Place information boards at construction sites and in settlements with the contact details for communication regarding issues related to the Project	Local residents	Information boards	At least one month Before the start of construction works	Toza Hudud SUE, contractors	Potentially affected settlements (lists A1 and B1 in Section 5.2)
17.	Ensure the availability of/access to sample grievance and suggestion forms	Local residents and any stakeholders	Sample forms for filing grievances	Before the start of construction works	Toza Hudud SUE, contractors	Construction sites of the Project facilities Public Visitor Centres at the offices of Toza Hudud SUE and its district branches Offices of the heads of MCAs/VCAs of potentially affected settlements (lists A1 and B1 in Section 5.2)

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
18.	Keep a record of the received proposals and grievances in special logs, providing feedback on each appeal	Affected and other stakeholders	Log (register) of grievances and proposals	During the entire Project lifecycle	Toza Hudud SUE, contractors	Grievance and Proposal Register kept at Toza Hudud SUE's office
19.	Conduct thematic meetings with the public on issues of interest to them related to the Project (changes in tariffs and benefits, schedule and rules for the collection and transportation of MSW, scheme for transportation of construction materials, scheme for MSW transportation, on bypass routes during constriction and peak loads during operation)	Local residents, potentially affected stakeholders	Information leaflets, maps, specific information depending on the information needs of potentially affected stakeholders	During the entire life cycle of the Project, as necessary and as the Project is developed	Toza Hudud SUE and its district branches	The location of the meetings depends on the nature of the issue and the location of the specific stakeholders
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>Conduct thematic meetings in a remote / online format (video and chat conferences, live broadcasts, etc.)</i>				
20.	Review and update the SEP based on the assessment of its effectiveness, information needs of stakeholders, and other changes that require the revision of methods / frequency of stakeholder engagement	All stakeholders	Updated SEP	Regularly throughout the entire life cycle of the Project	Toza Hudud SUE	GosKomEkologiya's website
21.	Prepare annual reports on the E&S performance of the Project	EBRD	Report as per the Bank's format	Once a year during the entire life cycle of the Project	GosKomEkologiya, Project Implementation Unit, with inputs from Toza Hudud SUE	

7. GRIEVANCE MECHANISM

The proposed grievance mechanism, introduced by Toza Hudud SUE, will meet both the requirements of the legislation of the RoU²⁷ as well as the requirements of the EBRD. It will allow affected and other stakeholders to submit a proposal or grievance regarding the Project, including related E&S issues. This mechanism will ensure the prompt and effective resolution of problematic issues, taking into account the principles of transparency and respect for the cultural traditions of the territory of the Project implementation.

Prior to commencement of construction work on the Project, the Company will inform all stakeholders about the grievance mechanism. Grievances and suggestions can be addressed to the representative of the Company who is responsible for their consideration and resolution. The contact details of the representative are listed below:

Name: Kilichov Atabek Adamovich
Position: Head of the Department of Ecology and Environmental Protection of Khorezm Region
Address: Urgench city, Yoshlik street, 1.
Email: uznature@exat.uz OR horazm@uznature.uz
Phone: +998 622 24 14 89

Grievances and proposals can be submitted to the Company in writing using the Sample Grievance Form provided in **Appendix 1**. Such forms will be published in electronic format on the Company's website after it has been created, and they will also be available in printed form near the boxes for grievances and appeals located in the offices of the heads of MCAs, district branches of Toza Hudud SUE, at the Project construction sites, etc.

Grievances received by phone, e-mail, mail, text messages (SMS), or messages in instant messengers will also be registered and considered. Grievances can also be submitted anonymously; however, it is recommended that contact details be provided so that the Company can provide a written response to the sender of the grievance.

According to the legislation of the RoU, appeals and grievances are considered within 15 days from the date of their receipt; however, if necessary, this period can be extended to one month provided that the sender of the appeal / grievance is informed of the extension²⁸. The prepared response is approved by the head of the Company and sent to the sender of the appeal / grievance.

The Company will maintain a Grievance (and Proposals) Log, which will record all grievances regarding the Project throughout the entire life cycle. The following information should be recorded in the Log:

- The essence of the received grievance / proposal / appeal;
- Date of application;
- Contact information of the sender (if the complaint was not submitted anonymously);
- Description of the actions taken (investigation, corrective action, preventive action, etc.);
- Date of decision making and closing / providing a response to the sender;
- Details of the sender's consent / disagreement with the decision and measures taken.

²⁷ The Law of the RoU of 11 September 2017 No. ZRU-445 On Amendments and Additions to the Law of the RoU on Appeals of Individuals and Legal Entities.

²⁸ See above.

8. MONITORING, ASSESSMENT, AND REPORTING

The successful implementation of the SEP depends on the continuous monitoring, assessment, and reporting of its implementation.

The Company will appoint a personnel responsible for organising, implementing, monitoring, assessing, and reporting on stakeholder engagement activities.

To ensure the monitoring and effectiveness assessment of stakeholder engagement, the following set of key indicators has been identified:

- SEP has been developed and published for review and comments;
- SEP is updated as comments and suggestions are received;
- All planned activities envisaged by the Stakeholder Engagement Programme have been completed in full and on schedule;
- Minutes of public hearings / discussions are drawn up and disclosed;
- Grievances and proposals from stakeholders regarding the Project received by the Company (and contractors) are recorded (disaggregated by gender of the sender) and tracked until they are resolved;
- The main categories of grievances received and how they were received;
- Contracts with contractors include clauses providing for the fulfilment of the relevant requirements of the SEP;
- The number of grievances resolved within the acceptable time frame and the number of grievances remaining unresolved;
- Annual reports on the implementation of the SEP and handling of grievances.

In order to improve the effectiveness of the SEP, it is necessary to periodically assess and adjust the SEP in accordance with the changed circumstances and information needs of stakeholders. The SEP will be updated at least one year after the start of construction and before the Project facilities are put into operation; each updated version will determine the future frequency of SEP updates. If changes and additions are made to the SEP, the updated version will be disclosed.

The results of the stakeholder engagement process will be analysed monthly and quarterly, and a summary of the analysis will be included in the annual E&S reports submitted to the EBRD.

APPENDIX 1. SAMPLE GRIEVANCE FORM

Reference No. (for internal purpose only)

Full name: Name _____
Surname _____

- I wish to submit my grievance anonymously
- I request not to disclose my identity and contact details without my consent

Contact Details
Please mark how you wish to be contacted (mail, telephone, Telegram, e-mail)

By Post: Please provide mailing address:

By telephone: _____

By e-mail: _____

Preferred Language for Communication

- Uzbek
- Russian
- Other, please specify _____

Grievance Description

Date of Incident / Grievance

- One-time incident / grievance (date _____)
- Happened more than once (how many times?) _____)
- Ongoing (currently experiencing the problem)

What measures would you like to propose to solve your problem?

Signature:

Date:
