

Navoi Solar PV Project, Uzbekistan

Stakeholder Engagement Plan

DRAFT

Nur Navoi Solar FE LLC

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Quality information

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1. Introduction

1.1 Purpose of this Document

This document constitutes the Stakeholder Engagement Plan (SEP) for a proposed 100 megawatt (MW) solar photovoltaic power plant in the Navoi region in the Central part of the Republic of Uzbekistan, known as Nur Navoi Solar Park (the 'Project').

It presents the broad approach and key steps to be undertaken by Nur Navoi Solar FE LLC (hereinafter referred to as 'Nur Navoi'), to plan and manage stakeholder engagement activities throughout various stages of the Project implementation.

This SEP is a 'live' document, which will be periodically revised in course of the Project lifecycle, when required. The current version covers engagement activities to be undertaken during the undertaking of the national Environmental Impact Assessment (EIA) and international Environmental and Social Impact Assessment (ESIA) processes.

1.2 Objectives of Engagement

This SEP sets out the process for undertaking engagement and consultation with stakeholders. Consultation with stakeholders is essential to obtaining the Project's social 'Licence to Operate' and facilitating the successful completion of the baseline socio-economic and environmental surveys. Stakeholders include local communities potentially affected by the survey activities and other stakeholders not directly affected but who have an interest in these activities or who could affect their progress. These could include national and local authorities, neighbouring projects, and/or non-governmental organisations.

The SEP aims to establish the process and tools to:

- Identify and map stakeholders who have influence on the Project or who the Project influences, and identify and record key issues and concerns that stakeholders may have about the Project;
- Identify whether there are any vulnerable communities/groups, and if so engage with them in meaningful informed consultation;
- Build trusting relationships with local stakeholders based on a transparent and timely supply of information, open dialogue, and provision of opportunities for stakeholders to voice opinions and concerns for informing Project design and mitigation measures, and minimising impacts on local resources and/or stakeholders;
- Keep stakeholders regularly informed about the Project's activities, explaining the nature of the construction and operation stages, overall Project duration, and any changes that could generate new impacts or increase the existing ones, and opportunities for grievance and engagement;
- Demonstrate how national requirements, good international industry practice (GIIP) and IFC guidelines and corporate requirements have been addressed in the national EIA and/or ESHIA;
- Build positive stakeholder relationships and ensure ongoing stakeholder participation;
- Implement a viable grievance mechanism; and
- Maintain a record of all consultations and grievances using a Stakeholder Database and Grievance Mechanism Database (or similar).

1.3 Structure of the Document

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

The SEP contains the following sections:

- Chapter 2 – Project description;
- Chapter 3 – Roles and responsibilities;
- Chapter 4 – Regulatory Policy and Framework;

- Chapter 5 – Stakeholder identification and analysis;
- Chapter 6 – Stakeholder engagement program;
- Chapter 7 – Tools, techniques and record management;
- Chapter 8 – Grievance mechanism.

2. Project Description

2.1 Key Elements and Activities

The proposed project site is located in the Navoi region, approximately 35 kilometres east of Navoi City, 16.2 kilometres west of Navoi International Airport, and 2.5 kilometres to the west of Uzumzor settlement. As noted, the land is currently used for rough grazing of livestock. At the time of the March 2020 site visit this consisted of sheep and goats although AECOM were informed that cattle would also be grazed on occasions. Previous attempts to cultivate arable crops were noted but it is important to note that a combination of poor soil quality and lack of water made this unviable. Based on discussions on site, attempts at arable cultivation were abandoned approximately 5 years ago.

The PV Plant will occupy approximately 267 hectares (2.6 km²) of land and will be enclosed by a 2.5-meter-high fence. These features are demonstrated in Figure 2-1 with the plot boundaries shown in Figure 2-2.

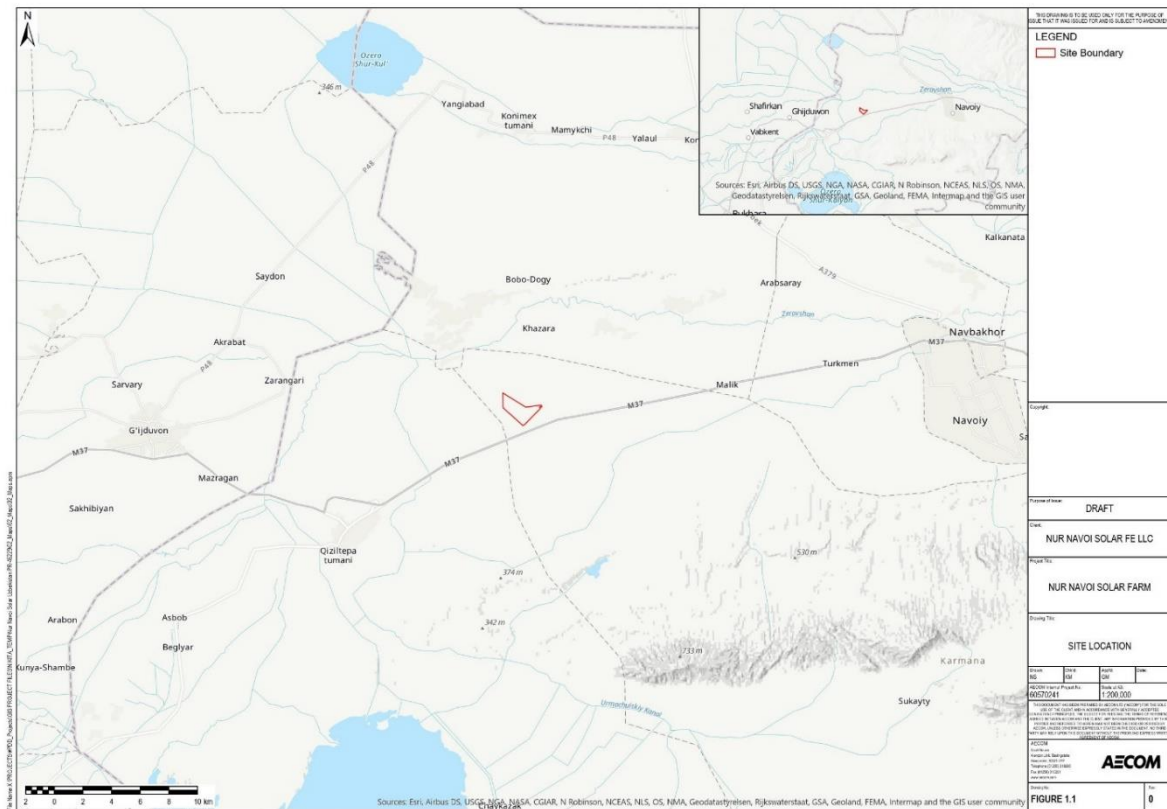


Figure 2-1: Project Geographical Location

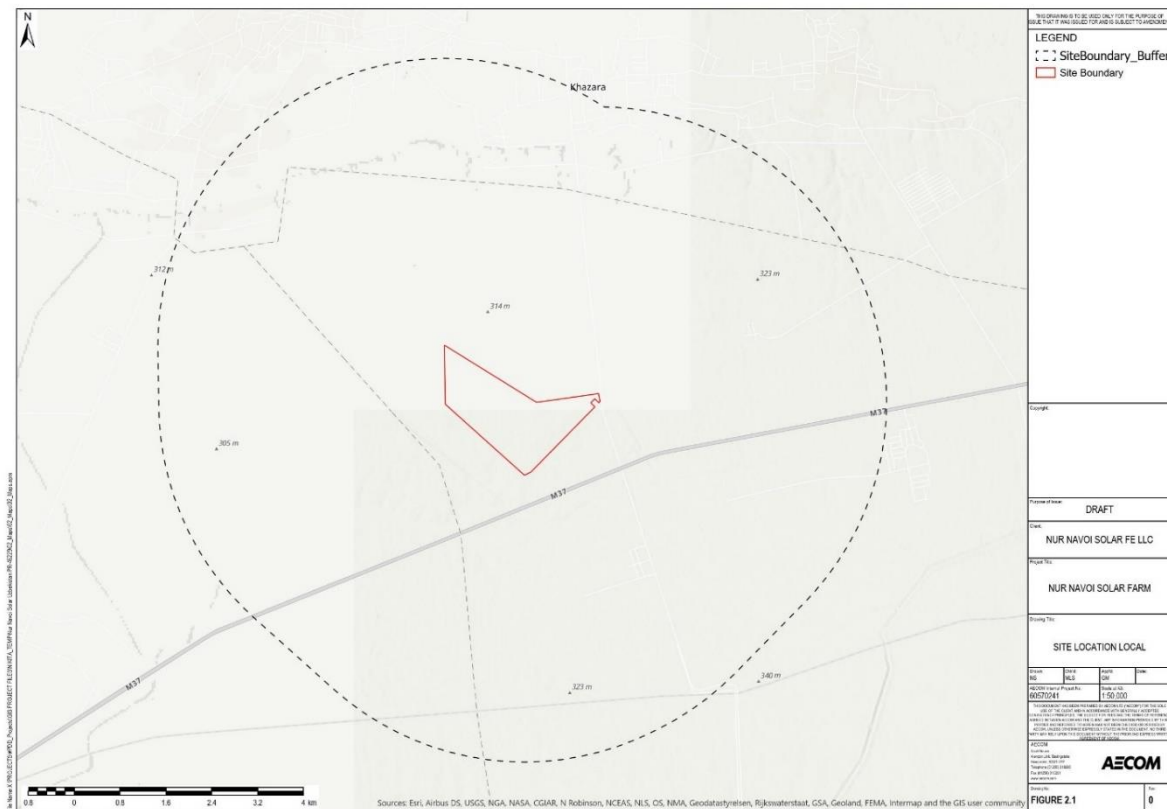


Figure 2-2: Project Site

It is proposed to locate the necessary infrastructure in the eastern part of the plot, immediately adjacent to the substation and 220kV overhead line to which the PV power plant will connect. The site is accessible via the existing M37 highway and minor road leading to the substation and compound area; minor upgrades to short sections of unsealed road after the junction with the M37 and within the site will be required to accommodate heavy construction vehicles entering the site.

The layout/shape of the project footprint is subject to operational requirements, to be finalised with the EPC contractor, and hence will be confirmed close to the commencement of the construction phase.

The closest identified residential areas are the village of Uzumzor (~600 inhabitants), located approximately 2.6 km east from the boundary of the site, and a small village-sized cluster (~100 inhabitants) of residential properties approximately 2.2 km south.

It is expected that during construction phase approximately 320 personnel will be working on site in peak times. The size of the operational workforce will depend on the final operation and maintenance concept; however, it is anticipated that around 25 workers will be employed by the Project during operation.

The key components of the solar photovoltaic (PV) power plant are:

- PV modules, which will produce direct current;
- Mounting structures, which the PV modules will be installed on;
- Inverters and medium voltage (MV) transformers, converting direct current into alternating current;
- On-site high voltage (HV) substation and transformer, which convert the electricity from MV to HV;
- Overhead line infrastructure to transport the electricity to the existing 220kV overhead line; and
- Other equipment such as switchgear, grounding, and lighting protection.

Such information is based on preliminary information and design provided by the Proponent.

The anticipated lifespan of the Project is approximately 25 years, after which the PV generating facility will be decommissioned, and the site reinstated back to the previous land use (agriculture).

A full project description is provided in the project ESIA.

2.2 Schedule

At the time of writing (Feb 2020), the Project design is being finalised, and the ESIA study is yet to be completed. Construction will start once all the required permits and licences have been granted by the authorities. Construction of the PV power plant will take approximately 9-12 months to complete and will be timed to avoid winter months due to difficult weather conditions. A further one and a half months will be required to commission and test the installation before the PV power plant can start supplying the grid in the first quarter of 2022. A summary of key project stages is provided in Table 2-1.

Table 2-1: Project Schedule

Task	2020		2021				2022			
	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Project design, including ESIA study										
Procurement of PV panels and grid connection equipment										
Construction										
Commissioning and operation start										

2.3 Project Area of Influence

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

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

3. Roles and Responsibilities

This section presents an organisational structure to support Nur Navoi in delivering stakeholder engagement activities. Roles presented relate to activities and responsibilities, rather than individuals, and may be filled by existing Nur Navoi staff, potential new Nur Navoi staff, or Nur Navoi’s consultants.

Effective stakeholder engagement requires clear lines of communication and effective coordination within the Project, between the Project and partners, and with stakeholders.

Key participants in the management of stakeholder engagement include:

- Nur Navoi In-country Project team, with technical support from Nur Navoi Operations and Technology group; and
- Project consultants and contractors.

The Nur Navoi in-country Project Team will be responsible for stakeholder engagement throughout the life of the Project. The Project’s Environmental & Social consultant will assist the in-country Project Team with engagement activities during the ESIA process, as per the pre-agreed allocation of roles.

Table 3-1 sets out the key roles and responsibilities required to manage the stakeholder engagement process for the Project.

Table 3-1: Key Internal Stakeholder Tasks and Responsibilities

Responsibility	Task
NUR NAVOI	
Nur Navoi’s in-country Project Stakeholder Engagement (SE) Manager	<p>Ensuring that there is a clear and well-defined strategy to guide stakeholder engagement activities and that the staff, resources and systems are in place to enable the strategy and this SEP to be implemented. Tasks would include:</p> <ul style="list-style-type: none"> • Ensure this SEP is updated on a regular basis, as when appropriate; • Planning, implementing and conducting day-to-day ongoing management of stakeholder engagement, including grievances; • On-going maintenance of records of formal and informal stakeholder engagement activities; • Organisation, logistical arrangements and attendance at stakeholder meetings; • Preparation of information for dissemination to stakeholders in accessible formats; • Ensure that the Grievance Mechanism is implemented.
PROJECT’S ENVIRONMENTAL & SOCIAL CONSULTANT	
ESIA Social Lead <i>(to be involved up to the point of the EIA/ESIA disclosure)</i>	<ul style="list-style-type: none"> • Providing support to the Nur Navoi’s in-Country Project Stakeholder Engagement (SE) Manager; • Supporting Nur Navoi with organisation, logistical arrangements and attendance at stakeholder meetings; • Documenting stakeholder engagement activities.

4. Regulatory Policy and Framework

Stakeholder engagement for the Project will comply with RUz national legislative requirements, Nur Navoi corporate policy on communication and engagement, and international best practice, where feasible.

This section details the legal, regulatory, and company requirements pertaining to stakeholder engagement. It further outlines the standards for international good practice in stakeholder engagement which have informed the development of this document.

4.1 National EIA Consultation Requirements

National legislation in Uzbekistan states that the public should be informed about the Project and have an opportunity to comment on the information provided.

The Operator shall report to SCNP of Uzbekistan and appropriate Public Authorities of Uzbekistan about the measures taken. Requirements to the content, development procedure and examination of Environment Impact Assessment (EIA) documents are governed by the following legislative acts of the Republic of Uzbekistan:

- Law of the Republic of Uzbekistan No 754-XII dated 09.12.1992 On Environment Protection;
- Law of the Republic of Uzbekistan No 73-II dated 25.05.2000 On Environmental Impact Audit;
- Regulation On State Ecological Expertise in the Republic of Uzbekistan, approved by the Decree of the Cabinet of Ministers of the Republic of Uzbekistan No 491 dated 31.12.2001.
- EIA documents consisting of the following stages are being developed for designed facilities in accordance with the given requirements:
- DEIA - Draft Environmental Impact Assessment, which shall be developed in the conception stage of planned or anticipated economic or other activity prior to the beginning of project financing (1 stage of EIA);
- EIA - Environmental Impact Assessment, which shall be developed if, based on the results of DEIA State Environmental Expertise (SEE), it was ascertained that additional surveys, on-site investigations, special analyses, simulation experiments and development of well-founded environmental actions are required (2 stage of EIA). Necessity of EIA development shall be defined by State Committee on Nature Protection of the Republic of Uzbekistan based on the results of DEIA state environmental expertise.
- EEA - Ecological Effect Assessment, which shall be developed prior to commissioning of the project and shall be final stage of EIA procedure for designed facilities (3 stage of EIA). (considering, that these standards and experience do not contradict the legislation) on safety and EP. Operator has ISO 14001 and OHSAS 18001 certification.
- Project developer takes all reasonable measures in accordance with these laws and standards in order to minimize any potential violations of general balance of environment, including, but not limited to, land surface, subsoils, air, lakes, rivers, flora and fauna, crops and other natural resources. Sequence of actions is determined in the following order: life protection, EP and property protection.

4.1.1 Public Hearings

Public hearings cover results of the EIA (and Preliminary EIA, where necessary) of proposed economic activities that may have a significant impact on the environmental and human health.

It is anticipated that public hearings are held in relation to projects that may directly affect the environment and human health and to draft environmental protection action plans. Public hearings provide participants equal rights to express their opinions based on documentary materials on the issue containing public information. Participants of public hearings include:

- Interested public;
- Public and non-governmental organisations and associations;

- Local executive and representative bodies, governmental bodies authorised to make relevant decisions; and
- Mass media.

If applicable the Project developer should assist the local authority in arranging public hearings. The Project developer should interact with local executive authorities regarding the date and venue of the public hearings. The public announcement should be published 20 days prior to the date of the public hearings. The announcement should also specify contact details of offices where members of the public may review the EIA documents prior to the public hearings event.

The public hearings will be held irrespective of the number of participating members of the public. During the hearings, any participant will have the right to express his or her opinion and raise questions to the speakers. The results of the public hearings will be documented in minutes. The Project developer and EIA consultants will review the results and may decide to improve the Project documents to incorporate public opinion. The Project developer will be responsible for the financing, technical, and information support of the public hearings, as agreed between the Project developer and the respective environmental authority.

4.2 International Standards

The IFC Performance Standards (PS) set out the requirements for undertaking stakeholder engagement throughout the Project lifecycle and requires formal evidence of stakeholder engagement at specific stages of Project development, including key stages within the ESHIA process, e.g. ESIA Scoping, draft ESIA preparation, and commencement of operations.

IFC PS 1 ‘Assessment and Management of Environmental and Social Risks and Impacts (2012)’ sets out the requirements relating to stakeholder engagement and the EIA process, particularly in relation to ‘Affected Communities’. Further guidance is available in the IFC documents ‘Good Practice Manual: Doing Better Business through Effective Public Consultation (1998)’ and ‘Stakeholder Engagement: A Good Practice Handbook for Companies doing Business in Emerging Markets (2007)’.

A summary of IFC Performance Standard 1 engagement requirements is presented in Table 4-1. These will be applied by the Project as a benchmark of GIIP.

Table 4-1: Stakeholder engagement requirements as set out in IFC Performance Standard 1

Issues	Key Requirements
Stakeholder analysis and planning	<ul style="list-style-type: none"> • Identify Project affected stakeholders, including vulnerable groups¹ • Develop and implement a Stakeholder Engagement Plan
Disclosure of information	<ul style="list-style-type: none"> • Provide stakeholders with access to information on: <ul style="list-style-type: none"> - Purpose, nature and scale of the Project - Duration of proposed Project activities - Any risks, potential impacts and mitigation measures - Proposed stakeholder engagement process - Grievance Mechanism
Consultation	<ul style="list-style-type: none"> • Consultation will be in line with the degree of potential project impacts and will: <ul style="list-style-type: none"> - Begin early and continue throughout the Project lifecycle - Be based on prior disclosure and dissemination of information - Focus on those directly affected - Be free of outside interference and external manipulation - Enable meaningful participation - Be documented
External communications	<ul style="list-style-type: none"> • Implement and maintain a procedure for external communications that: <ul style="list-style-type: none"> - Registers communication - Screens and assesses issues raised - Tracks and documents responses - Adjusts the management programme

¹ Vulnerable stakeholders are defined as those who may be differently or disproportionately affected by the Project due to pre-existing disadvantaged status, or whose situation may mean that they are hard to reach, and/or require differentiated measures in consultation and disclosure activities to allow their effective participation.

Issues

Key Requirements

Grievance Mechanism

- Establish a Grievance Mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the Project.
- The Grievance Mechanism should:
 - Resolve concerns promptly
 - Use a transparent and culturally appropriate consultative process

Ongoing reporting to affected communities

- Provide periodic progress updates, specifically with regard to issues or grievances communities have raised
 - Communicate any updates of the management programme
 - Report to the community with frequency that is proportionate to the concerns of affected communities but not less than annually.
-

Source: IFC Performance Standards, 2012

5. Stakeholder Identification and Analysis

5.1 Stakeholder identification

In accordance with international standards and Nur Navoi's corporate standards, this SEP must ensure that relevant stakeholders have been identified and consulted.

Stakeholder identification is conducted based on available primary and secondary data information, a review of available Project documentation, input from the Project consultants, as well as being informed by the results of site visits.

The stakeholder list will be continuously updated throughout the life of the Project.

Table 5-1 outlines the stakeholder groups and potential key stakeholders, as well as their specific relevance to or interest in the Project that have been identified during the ESIA scoping stage.

Table 5-1: Summary of Key Potential Stakeholders following Identification and Analysis

Stakeholder Group	Stakeholders	Interest/Relation to the Project
Institutional-based Stakeholders (regional – Navoi)	<ul style="list-style-type: none"> Deputy Khokim of Navoi region Chief of the Main Department Chief specialist of the Investments department of Navoi region Deputy Khokim of Karmana district on investment, innovation, support of privatized enterprises, free economic and small industrial zones as well the development of tourism Head of District Irrigation Department Chief Engineer, Cadastral officials of Karmana district <ul style="list-style-type: none"> Chief Inspectorate of State Committee for Nature Protection of Navoi Region Chief Specialist of the Centre for Ecological Expertise Head of District Melioration Department Head of Investment Department of the Karmana Khokimiyat Deputy of Labour Department of Navoi region 	<ul style="list-style-type: none"> Approvals for and assistance in Project activities within each of the authorities' remit (land issues, water use, energy, investment support, etc.) Support with providing various baseline information on the area of Project implementation (from the rural district level to the republican level) Potential assistance in interaction with other authorities and local population/organisations
Institutional-based Stakeholders (local)	<ul style="list-style-type: none"> Chairman of the mahalla committee Malik (Uzumzor is part of the Mahalla Malik) 	<ul style="list-style-type: none"> To be informed during next site visit.
Local communities	<ul style="list-style-type: none"> Uzumzor 	<ul style="list-style-type: none"> Potential perceivable impacts of the Project (dust, noise, glare, visual, water- and land use-related, load on communal infrastructure) Potential opportunities (employment, community development)
Specialist from the Women's Committee	<ul style="list-style-type: none"> Nilufar Gafforova. Chief specialist on women and gender issues, Malik Mahalla Gulnoza Shermatova. First Deputy, Department for support of marhalla and families, Karmana Khokimiyat 	<ul style="list-style-type: none"> They have a programme to integrate women, including but not limited to vulnerable categories (e.g. ex-convicts, domestic violence, etc.), in the job market. They offered support to the future concessionaire to help recruit women for the project.
Local Land Users (involved in herding activities undertaken on/through the Project site, etc.)	<ul style="list-style-type: none"> Farm A Farm B 	<ul style="list-style-type: none"> Potentially impacted due to disturbed access to the commonly used grazing lands and existing tracks

Stakeholder Group	Stakeholders	Interest/Relation to the Project
Media	<ul style="list-style-type: none"> To be confirmed following next site visit. 	<ul style="list-style-type: none"> Potential communication channels/means of the Project information disclosure
Research/Educational Organisations	<ul style="list-style-type: none"> To be confirmed following next site visit. 	<ul style="list-style-type: none"> Research in the fields of water management, environment and construction, potential support with providing baseline information on these matters Graduates may potentially be interested in/suitable for employment on the Project
Business operators and organisations	<ul style="list-style-type: none"> To be confirmed following next site visit. 	<ul style="list-style-type: none"> To be confirmed following next site visit.

5.2 Stakeholder Analysis

As well as identifying potential stakeholders, it is also necessary to determine the level of engagement priority that should be afforded to Project stakeholders. Stakeholder priority can be determined by understanding each stakeholder's influence and impact in relation to the Project. This is termed "stakeholder mapping", the process for which is outlined below.

5.2.1 Assessing Stakeholder Impact

Stakeholder impact is defined as the extent to which the interests of a stakeholder are affected by a project. These impacts can be either positive or negative and lead to either an improvement or deterioration in their conditions. For the purposes of this exercise, all stakeholders will be assigned into one of three impact significance categories to help inform the stakeholder mapping process: high, medium, and low. These terms are defined as follows:

- High impact** – The Project potentially has a significant beneficial or adverse impact on the interests of a stakeholder. The impact is generally considered to be high when the number of people affected is large (e.g. greater than 50), the duration of the impact is over the long-term (perceived for over a year), extends over a large area (i.e. regional, international and transboundary), and/or the stakeholders are highly sensitive to the impact.
- Medium impact** – The Project potentially has a moderate beneficial or adverse impact on the interests of a stakeholder. The impact is considered to be medium when a small number of people are affected (e.g. greater than 10, less than 50), the duration of the impact is over the medium-term (perceived for a few months), is experienced on a regional scale, and/or the affected stakeholders are moderately sensitive to the impacts.
- Low impact** – The Project potentially has a minor beneficial or adverse impact on the interests of a stakeholder. The impact is minor when the number of people affected is relatively small (e.g. less than 10), the impact is temporary, short term (perceived from few days and up to 2-3 months), or can be fully mitigated, scale of impact is local or on-site, and/or the stakeholders are not considered sensitive to the impact.

5.2.2 Assessing Stakeholder Influence

Influence in the stakeholder mapping context refers to the extent to which the stakeholder or group of stakeholders is/are able to influence the Project (including Nur Navoi's reputation) through affecting key aspects such as design and permitting decisions. Influence may be formal or informal, for example, informal influence through a personal connection to a politician or formal influence through the issue of government approvals and determinations.

All stakeholders will be assigned to one of three influence categories to help inform the stakeholder mapping process: high, medium and low. Categorisation is based on analysing three key elements related to influence: power, capacity and legitimacy.

These categories are by their nature subjective. However, through this analysis it is possible to establish the following broad definitions and categories of influence:

- **High influence** – The stakeholder or stakeholder group is considered highly influential when it has the capacity to halt the Project or significantly influence Nur Navoi's reputation, such as powerful civil society groups and individuals who can affect Project-related decision-making.
- **Medium influence** – The stakeholder or stakeholder group has a moderate capacity to exert influence over the Project or Nur Navoi's reputation, such as a lobby group, small associations, national, and international NGOs.
- **Low influence** – The stakeholder or stakeholder group is isolated and has limited capacity to exert influence over the Project or Nur Navoi's reputation. For example, stakeholders who may lack the institutional legitimacy or social capacity to affect the Project such as elderly, children, vulnerable, and disadvantaged members of the community. Isolated communities that are geographically distant are considered to have low influence, but a group of these communities connected through social media or associations can be considered as having moderate influence.

6. Stakeholder Engagement Programme

The stakeholder engagement programme should include:

- Activities that will be carried out regularly or in response to key milestones in the Project programme; and
- Activities that may be undertaken, if required, based on incoming stakeholder feedback, significant project changes or other unplanned events (e.g. following any potential surge of interest in the Project from local communities and NGOs), following receipt of the environmental permit and following completion of the EIA and ESIA.

The programme of engagement activities presented in Table 6-2 is focused on engagement activities Nur Navoi should be completing during the EIA and ESIA phases and the planned Project. During these activities, stakeholders may express concerns and ask questions about what happens during and after the construction and operations activities. The programme will need to be updated following each formal engagement activity undertaken. The aim of these activities will be to:

- Build and maintain stakeholder relationships;
- Continue to disclose Project information (including any access restrictions, employment and procurement opportunities, and community health and safety issues);
- Monitor and evaluate stakeholder engagement;
- Provide stakeholders the opportunity to provide feedback to Nur Navoi; and
- Manage grievances through the Grievance Mechanism.

Brief information on the different communication methods for carrying out stakeholder engagement is presented in Section 7.2.

This SEP (and the engagement programme) will be updated with the Project moving to the construction stage, as well as upon commencing the operations.

6.1 Previous SE Activities: E&S Scoping Phases

The first official round of stakeholder engagement activities (from an E&S perspective) took place in Navoi (city) and in Uzumzor on the 5th and 6th of March 2019.

Further stakeholder engagement took place in March 2020 as part of the Preliminary ESIA phase.

The stakeholders identified and relevant information about the outcomes of the meetings are described below.

Table 6-1: Summary of Stakeholder Engagement to Date

Date	Stakeholders	Stakeholder Engagement Methods	Location	Purpose	Summary Feedback
6 March 2019	<ul style="list-style-type: none"> Farm A Landowner 	Face-to-face meetings	At Farm A	<ul style="list-style-type: none"> Inform the relevant stakeholders about the proposed project; Capture views and concerns of the relevant stakeholders about the project; Understand the needs of the communities and capture valuable information to make an informed decision. 	Did not attend meeting
6 March 2019	<ul style="list-style-type: none"> Farm B land user 	Face-to-face meetings	At Farm B	<ul style="list-style-type: none"> Inform the relevant stakeholders about the proposed project; Capture views and concerns of the relevant stakeholders about the project; Understand the needs of the communities and capture valuable information to make an informed decision. 	Farm B are content with the development, but they are concerned about the lack of response to obtain alternative land from the Administration.
6-7 March 2019	<ul style="list-style-type: none"> Deputy Khokim of Navoi region Chief of the Main Department Chief specialist of the Investments department of Navoi region Deputy Khokim of Karmana district on investment, innovation, support of privatized enterprises, free economic and small industrial zones as well the development of tourism Head of District Irrigation Department Chief Engineer, Cadastral officials of Karmana district 	Common meeting at the Provincial Administration Offices	Navoi City	<ul style="list-style-type: none"> Identify and prioritize key stakeholder groups; Inform the relevant stakeholders about the proposed project; Capture views and concerns of the relevant stakeholders about the project; Understand the needs of the communities and capture valuable information to make an informed decision; Enhance ownership of the Project within the host communities; Provide a basis for stakeholder participation in impact identification and mitigation; Provide a basis for managing and responding grievances from the local communities and other stakeholders, and 	<p>Generally satisfied with the project.</p> <p>Observations made in terms of:</p> <ul style="list-style-type: none"> Nature of the canal adjacent to the site (irrigation) and permits to obtain water. General status of the proposed land, previous and current contracts (right of use).

Date	Stakeholders	Stakeholder Engagement Methods	Location	Purpose	Summary Feedback
6-7 March 2019	<ul style="list-style-type: none"> Chairman of the mahalla committee Malik (Uzumzor is part of the Mahalla Malik) 	Meeting at the Local Administration Offices	Uzumzor	<ul style="list-style-type: none"> Provide a strategy and timetable for sharing information and consulting with each of these groups. Understand the EIA regulatory framework; Explain the Project and its expected effects; Get the views and opinions on potential Project impacts; Gather existing baseline information on the environmental aspects. 	Satisfied with the fact that the project will be developed in the local council she rules. She mentioned that there is a community (named Residential Area in the Project Location section), that apparently is not within her jurisdiction, with a high unemployment rate.
6-7 March 2019	<ul style="list-style-type: none"> Specialist from the Women's Committee 	Meeting at the Provincial Administration Offices	Uzumzor	<ul style="list-style-type: none"> Capture views and concerns of the relevant stakeholders about the project. 	They have a programme to integrate women, including but not limited to vulnerable categories (e.g. ex-convicts, domestic violence, etc.), in the job market. They offered support to the future concessionaire to help recruit women for the project.
12 April 2019	<ul style="list-style-type: none"> Cadastral officials of Karmana district 	Navoi Khokimiyat	Navoi	<ul style="list-style-type: none"> Confirm that there were no grievances, open claims or court cases, filed by the project area land occupiers/users with the government. 	No issues identified
PRELIMINARY ESIA PHASE					
2 March 2020	<ul style="list-style-type: none"> Kamoliddin Khasanov. Deputy Khokim of Navoi Region on Investments 	Face-to-face meetings	Navoi Khokimiyat	<ul style="list-style-type: none"> Mission tasks, stakeholders meeting list 	<ul style="list-style-type: none"> Overview of the region economic indicators
2 March 2020	<ul style="list-style-type: none"> Elbek Gafforov. Deputy Head of Investment Department n of Navoi Region Khokimiyat 	Face-to-face meetings	Navoi Khokimiyat	<ul style="list-style-type: none"> Mission tasks, stakeholders meeting list 	<ul style="list-style-type: none"> Provided general support to the ESIA team.
2 March 2020	<ul style="list-style-type: none"> Hurshid Karamatov. Investment and Foreign Trade Department of Navoi Region Khokimiyat 	Face-to-face meetings	Navoi Khokimiyat	<ul style="list-style-type: none"> Mission tasks, stakeholders meeting list 	<ul style="list-style-type: none"> Provided general support to the ESIA team.
2 March 2020	<ul style="list-style-type: none"> Mumin Ikromov. Head of Navoi region Melioration Department 	Face-to-face meetings	Navoi Khokimiyat	<ul style="list-style-type: none"> Specialists required for the meeting 	<ul style="list-style-type: none"> Provided general support to the ESIA team.
3 March 2020	<ul style="list-style-type: none"> Abbos Ibragimov. Lead Specialist of Navoi Region Irrigation Department 	Face-to-face meetings	Navoi Khokimiyat	<ul style="list-style-type: none"> Specialists required for the meeting 	<ul style="list-style-type: none"> Information provided on irrigation canals, water abstraction permits and issues.

Date	Stakeholders	Stakeholder Engagement Methods	Location	Purpose	Summary Feedback
3-7 March 2020	<ul style="list-style-type: none"> Sherzod Jumaev. Deputy Khokim of Karmana District 	Face-to-face meetings	Navoi and Karmana Khokimiyat	<ul style="list-style-type: none"> Arranging the meetings and support with any information required. 	<ul style="list-style-type: none"> Provided general support to the ESIA team.
4 March 2020	<ul style="list-style-type: none"> Farm B land user 	Face-to-face meetings	At Farm B	<ul style="list-style-type: none"> Inform the relevant stakeholders about the proposed project status; Capture views and concerns about the project. 	<ul style="list-style-type: none"> As per previous meeting Farm B are content with the development, but they are concerned about the lack of response to obtain alternative land from the Administration.
4 March 2020	<ul style="list-style-type: none"> Participants: consultants (Yusupova Saida, Sharipova Elmira), representative of the Karmana khokimiat, teachers of school No. 26, representatives of the makhalla committee, elders and residents of the makhalla Malik (Kurgan Gulshan) and a doctor from the rural medical center of the mahalla Malik. 	Meeting at the local school 26	Malik	<p>The purpose of the meeting is to present the project; answer to questions of the residents in connection with a new project in the mahalla.</p> <p>The following issues were discussed:</p> <ul style="list-style-type: none"> Construction of a solar power plant (SPP). SPP is planned to be built on the territory of Uzumzor village, a part of the makhalla Malik. Brief information about the company Company projects in other countries Area of the SPP Technology to be deployed at the plant (solar panels) Impact on the residents 	<p>Questions and answers session:</p> <ul style="list-style-type: none"> What will be the environmental impact of the project? How many jobs will be created? What kind of specialists will be needed? What technology will be used when installing solar panels? Have such projects been implemented in Uzbekistan? Are there any similar projects in neighboring countries? Who is the customer of the project? Will there be a change in electricity tariffs for the population? Where will the equipment come from? How many kilometers from the SPP to the village? Who is the developer of the SPP project? Will provide services to repair solar panels installed by the population (for private use)? Drinking water coming through Damhodzha waterpipe in the summer has a weak watercourse. Gulshan barrow is located above the level of the water conduit and resedents pump water. Such situation exists only in this section of the Mahalla. Other sections are below the water level. Residents are afraid that if the SPP uses water, they will receive less water for their own needs. Farmers use water for irrigation from the Ami-Bukhoro canal and from two collectors. This summer, water was significantly reduced. Will there be enough water for irrigation and for the needs of the SES?

Date	Stakeholders	Stakeholder Engagement Methods	Location	Purpose	Summary Feedback
4 March 2020	<ul style="list-style-type: none"> Present: Yusupova Saida, Sharipova Elmira, representative of the Karmana khokimiat, teachers of school No. 23, representatives of the makhalla committee, residents of the mahalla Malik, Uzumzor village 	Meeting at the local school 23	Uzumzor	<ul style="list-style-type: none"> The purpose of the meeting is to present the project; answer to questions of the residents in connection with a new project in the mahalla. 	<p data-bbox="1588 272 2072 395">- Why this construction is prioritised? Law on Renewable Energy Lawa and the need for additional electricity capacity. - When will construction begin and when will the SPP start operations?</p> <p data-bbox="1588 432 2072 459">Questions & answers and suggestions received:</p> <ul style="list-style-type: none"> - For what needs the electricity generated by SPP to be used? - Who is the developer of the project? - What will be the impact on the environment? - During the work of the SPP, will there any radiation and what impact can it have on children? - Will jobs be created? - How can we get information about possible vacancies and employment opportunities for local residents in the SPP project? - Residents would like to receive information about vacancies at the SPP through the mahalla committee and the employment center. - Is it possible to organize additional training for local specialists for employment in the SPP project? - Will there be an increase in taxes and payments in connection with the construction of the SES? - Where will the SES be located? - Will there be an impact on plants and wildlife? - Project cost? - The approximate cost of the project is \$ 100 million per 100 MW. - Is it possible to get sponsorship from project owners for educational purposes, educational programs, trainings for school students on the topic of solar

Date	Stakeholders	Stakeholder Engagement Methods	Location	Purpose	Summary Feedback
					energy, and assistance in obtaining better Internet for educational purposes? - To work at the SES, what education do you need to receive and in which educational institution?
4 March 2020	<ul style="list-style-type: none"> Xamraeva Inobat. Chair of Malik Mahalla, Kaldirgoch village 	Face to face meeting	Malik Mahalla, Kaldirgoch village	<ul style="list-style-type: none"> Informing about the project Interviewing and collecting social baseline data 	<ul style="list-style-type: none"> Provided general socio-economic discussion of issues affecting the project area and locality.
4 March 2020	<ul style="list-style-type: none"> Nilufar Gafforova. Chief specialist on women and gender issues, Malik Mahalla 	Face to face meeting	Malik Mahalla, Kaldirgoch village	<ul style="list-style-type: none"> Informing about the project Interviewing and collecting social baseline data on gender and women issues 	<ul style="list-style-type: none"> Provided social baseline data on gender and women issues
5 March 2020	<ul style="list-style-type: none"> Gulnoza Shermatova. First Deputy, Department for support of mahalla and families, Karmana Khokimiyat 	Face to face meeting	Karmana Khokimiyat	<ul style="list-style-type: none"> Informing about the project Interviewing and collecting social baseline data on gender and women issues 	<ul style="list-style-type: none"> Provided social baseline data on gender and women issues
5 March 2020	<ul style="list-style-type: none"> Khusnitdin Shovkiev. Research specialist on tourism and archaeology, Karmana museum 	Meeting on site.	On site	<ul style="list-style-type: none"> Join visit to the project site and collecting data on archaeological sites 	<ul style="list-style-type: none"> Provided specialist support on site.
5 March 2020	<ul style="list-style-type: none"> Nuriddin Hamraev. Specialist of Karmana District Kadastr Department 	Face to face meeting	Karmana Khokimiyat	<ul style="list-style-type: none"> Information on the land lease process. 	<ul style="list-style-type: none"> Legal status of the land of the project Land allocation procedures to for farmers A and B;
5 March 2020	<ul style="list-style-type: none"> Muzafar Sharipov. Head of investment department of Karmana Khokimiyat 	Face to face meeting	Karmana Khokimiyat	<ul style="list-style-type: none"> Discuss the Project details, make preliminary agreements and arrangements that need to be in place as part of the Project design documentation development process/getting various approvals 	<ul style="list-style-type: none"> Additional information on landowners and land allocation procedures
5-6 March 2020	<ul style="list-style-type: none"> Akbar Asloitov. Lead Specialist on biodiversity of Navoi Region Environment Committee 	Meeting on site.	On site	<ul style="list-style-type: none"> Data collection on flora and fauna of the project area 	<ul style="list-style-type: none"> Provided specialist support on site.
6 March 2020	<ul style="list-style-type: none"> Specialists of the Emirate Centre for the Conservation of the Houbara in Navoi 	Face to face meeting	Emirate Centre for the Conservation of the Houbara	<ul style="list-style-type: none"> Observation of avifauna data 	<ul style="list-style-type: none"> Provided overview of Houbara bustard conservation work, range and confirmed site is unlikely to support any breeding pairs.
6 March 2020	<ul style="list-style-type: none"> Otabek Zaripov. Head of water department of Karmana District 	Face to face meeting	Karmana Water Department	<ul style="list-style-type: none"> Information about water pipe on the project area; 	Documents and maps of the pipe provided.

Date	Stakeholders	Stakeholder Engagement Methods	Location	Purpose	Summary Feedback
6 March 2020	<ul style="list-style-type: none">Rustan Matsuev. Chief Engineer, water department of Karmana District	Face to face meeting	Karmana Water Department	<ul style="list-style-type: none">Information about water pipe on the project area;	Documents and maps of the pipe provided.



Figure 6-1: Meeting at School 26



Figure 6-2: Meeting at School 26 (2)



Figure 6-3: Meeting at School 23

6.2 Future Stakeholder Engagement Activities

Nur Navoi will prepare, implement and maintain a Stakeholder Engagement Plan (SEP) to engage and build a robust relationship with all Project stakeholders (the ones outlined above as a minimum, including the users of the Farm A and the Farm B even if the alternative land provided by the Administration is elsewhere). The SEP shall involve a range of activities such as public disclosure of appropriate information, consultation with stakeholders, and mechanisms by which people can make comments and raise grievances. The SEP shall be aligned to the guidance provided below.

It should be noted that the stakeholder engagement is understood as continuous process and it will be maintained by Nur Navoi (owner) through the entire life cycle of the project or until Nur Navoi transfers the ownership of the project to a different party once the PPA expires. Stakeholder engagement responsibilities will not be transferred to contractors (EPC or O&M).

This section describes the proposed tools that can be used to fulfil the objectives of the SEP. Additional tools might be used following additional consultation with the stakeholders.

The engagement tools that can be used are divided into the following categories:

- Notification methods: Used to inform the identified stakeholders and the general population of the SEP activities and the project development process;
- Disclosure and consultation methods: Used to provide information to stakeholders or to engage in a two-way dialogue by which information is shared with the stakeholders and these in turn can express their views and concerns about the project, and
- External grievance mechanism: System to receive and facilitate resolution of the stakeholder's concerns and grievances about project-related issues.

The following section describes the proposed timeline for the stakeholder engagement during the ESIA phase and the tools that are proposed for each stakeholder engagement phase and for each type of stakeholder.

The draft SEP will be updated to account for ongoing engagement during construction and operational phases.

Table 6-2: Stakeholder Engagement Programme

Stakeholder Category	Stakeholder Engagement Methods	Location/ Timeline	Purpose	Consultation Disclosure Materials	Mean of Advance Notification
ESIA DEVELOPMENT PHASE					
<ul style="list-style-type: none"> Deputy Khokim of Navoi region Chief of the Main Department Chief specialist of the Investments department of Navoi region Deputy Khokim of Karmana district on investment, innovation, support of privatized enterprises, free economic and small industrial zones as well the development of tourism Head of District Irrigation Department Chief Engineer, Cadastral officials of Karmana district 	One-to-one meetings	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> Provide update on Project status; Get the views and opinions on potential Project impacts; Gather existing baseline information on the environmental aspects. 	Project leaflet / ESSR	Phone/email
Chairman of the mahalla committee Malik (Uzumzor is part of the Mahalla Malik)	One-to-one meeting	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> Provide update on Project status; Get the views and opinions on potential Project impacts; Gather existing baseline information, e.g. on livelihoods, demographics, health status, infrastructure, best approaches to further stakeholder engagement, key issues of concerns in the area 	Project leaflet / ESSR	Phone/email
Specialist from the Women's Committee	One-to-one meeting	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> Provide update on Project status; Get the views and opinions on potential Project impacts; Gather existing baseline information, e.g. on land use issues: how the project site and the surrounding lands are currently used 	Project leaflet / ESSR	Phone/email
Cadastral officials of Karmana district	One-to-one meeting	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> Provide update on Project status; Get the views and opinions on potential Project impacts; Gather existing baseline information, e.g. on water supply issues: water use patterns, municipal infrastructure – availability and capacities 	Project leaflet / ESSR	Phone/email
Land users	<ul style="list-style-type: none"> One-on-one meetings 	Location/Date: [TBC and will be decided on	<ul style="list-style-type: none"> Provide update on Project status; Collect information on the villages' profiles – demography livelihoods, farming, livestock, 	Project presentation Grievance Mechanism leaflet	Via the aksakals/phone

Stakeholder Category	Stakeholder Engagement Methods	Location/ Timeline	Purpose	Consultation Disclosure Materials	Mean of Advance Notification
		relaxation of Covid-19 restrictions]	health problems, gender roles, land use (herding, tracks), public infrastructure use, key problems in the area and potential concerns <ul style="list-style-type: none"> • Explain the Project and its expected effects; • Get the views and opinions on potentially concerning issues; • Share information on the Grievance mechanism. 		
Wider local community of Uzumzor	<ul style="list-style-type: none"> • Leaflets in public places • Media announcements • Grievance mechanism 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Provide update on Project status; • Get the views and opinions on potentially concerning issues; • Share information on the Grievance mechanism. 	Project leaflet (incl. information on the Grievance Mechanism)	Leaflets in public places Media announcements
Other governmental departments/agencies	<ul style="list-style-type: none"> • One-to-one meetings • Data collection requests • Email correspondence • Phone calls <p>[Depending on the Project needs and within each body's remit and field of responsibility]</p>	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Provide update on Project status; • Get the views and opinions on potential Project impacts; • Obtain the necessary approvals. 	Project leaflets/ESHIA scoping report/Official correspondence	Phone/email/personal interaction
Non-Government Organisations	<ul style="list-style-type: none"> • One-to-one meetings • Email correspondence • Phone calls 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Provide update on Project status; • Discuss opportunities for cooperation 	Project leaflet / ESSR	Phone/email/personal interaction
Media	<ul style="list-style-type: none"> • Media announcements • Grievance mechanism 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Provide update on Project status; • Share information on the Grievance mechanism. 	Project leaflet / ESSR	Phone/email
Research/Educational Organisations	<ul style="list-style-type: none"> • One-to-one meetings • Data collection requests • Email correspondence • Phone calls <p>[Depending on the Project needs and within each body's remit and field of responsibility]</p>	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Provide update on Project status; • Get the views and opinions on potential Project impacts; • Gather existing baseline information; • Share expectations on the employment 	Project leaflet / ESSR	Phone/email

EIA /ESIA DISCLOSURE PHASE

Stakeholder Category	Stakeholder Engagement Methods	Location/ Timeline	Purpose	Consultation Disclosure Materials	Mean of Advance Notification
All stakeholder groups	<ul style="list-style-type: none"> • Disclosure online • Placement of paper versions in public places • Leaflets in public places • Media announcements 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Disclose and discuss the results of the ESHIA study online 	NTS of the ESIA online	Media announcements Website announcements
Regional Government Agencies	<ul style="list-style-type: none"> • One-to-one meeting 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Discuss/coordinate the public hearing event on the local EIA results 	Local EIA package	Personal interaction
Local libraries	<ul style="list-style-type: none"> • One-to-one meetings • Phone calls • Placement of paper versions • Placement of leaflets 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Arrange disclosure of the local EIA package 	Local EIA package	Personal interaction
All stakeholder groups	<ul style="list-style-type: none"> • Public hearing event • Placement of leaflets in public places • Media announcements 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Comply with the RUz EIA regulatory requirements • Disclose and discuss the results of the EIA study 	Local EIA package NTS of the ESIA online	Media announcements
CONSTRUCTION PHASE					
All stakeholder groups	<ul style="list-style-type: none"> • Disclosure online • Placement of paper versions in public places • Leaflets in public places • Media announcements 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Disclose and discuss the construction status and any major events due to take place (component delivery for example). 	Notices	Media announcements Website announcements. Notice posted in public locations.
Regional Government Agencies	<ul style="list-style-type: none"> • One-to-one meeting 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Disclose and discuss the construction status and any major events due to take place (component delivery for example). 	Local EIA package	Personal interaction
Local libraries	<ul style="list-style-type: none"> • One-to-one meetings • Phone calls • Placement of paper versions • Placement of leaflets 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Disclose and discuss the construction status and any major events due to take place (component delivery for example). 	Local EIA package	Personal interaction Notice posted in public locations
All stakeholder groups	<ul style="list-style-type: none"> • Public event • Placement of leaflets in public places 	Location/Date: [TBC and will be decided on relaxation of Covid-19 restrictions]	<ul style="list-style-type: none"> • Disclose and discuss the construction status and any major events due to take place (component delivery for example). 	Local EIA package NTS of the ESIA online	Media announcements Notice posted in public locations

Stakeholder Category	Stakeholder Engagement Methods	Location/ Timeline	Purpose	Consultation Disclosure Materials	Mean of Advance Notification
	• Media announcements	relaxation of Covid-19 restrictions]			

7. Tools, Techniques and Record Management

7.1 Introduction

This section briefly describes tools and techniques that will/may be used for engaging with stakeholders, including frequently asked questions and answers, and specific tools and techniques that will/may be employed to share information with stakeholders and collect and compile their feedback.

7.2 Tools and Techniques for Engaging with Stakeholders

A variety of tools and techniques can be used to disclose Project information and collect engagement data. The key tools and techniques that can be used for the Project are summarised in Table 7-1. Note that consultation methods will be determined by the Covid-19 restrictions in place at the time.

Table 7-1: Tools and Techniques for Information Disclosure and Collection

Aim	Tool/Technique	Description
Share and disclose information	Public meeting	Allows disclosure of information to a wide range of stakeholders. Project information can be made available in printed format and Nur Navoi staff can provide verbal explanations. Should not be used as the sole means of information disclosure but consider combining with a technique that can reach less vocal and mobile stakeholders (e.g. poster/flyers/leaflets, letters, and media).
	Poster/Flyer/Leaflet	Use posters, flyers or leaflets to keep all stakeholders informed about the status and progress of the project. A means to reach stakeholders who are less likely to participate in a public meeting. A poster/flyer/leaflet can also be used to explain the grievance mechanism.
	Letter	A means to disseminate project information. Can also be used as a feedback mechanism to update stakeholders on how their comments have been considered. Combine with flyer and consider including a Comment Form.
	Media (radio, print, TV)	Television and print media can be used nationally. Useful to disclose information regarding permitting, and employment and any specific project progress updates.
Collect and compile information and feedback	Focus group discussion (FGDs)	Can be used to explore perceptions on specific issues in depth.
	In-depth informal interview	Useful technique to build rapport with stakeholders and to learn their individual perspectives on the Project. This is a time-consuming process and usually reserved for key stakeholders.
	Comment Form	A means to learn information from stakeholders individually and to allow less vocal stakeholders to share their views on the Project. Should be used at public meetings.
	Grievance Form	To collect information from a specific stakeholder relating to a specific project activity or activities and provide the stakeholder with a record of receipt/acknowledgement of their grievance.

Source: Adapted from 'Techniques for Effective Public Participation', International Association for Public Participation, 2011

The notification methods outlined below can be used for announcing information disclosure and consultation activities.

7.2.1 Signboards and Posters

Signboards and posters are useful to notify local communities and other affected stakeholders of consultation activities. These methods will be deployed two weeks in advance of a specific activity (e.g. public consultation), if possible, to allow for word of mouth dissemination of the relevant information.

7.2.2 Community Liaison Officer

Nur Navoi will employ a Community Liaison Officer (CLO) who will communicate with the stakeholders.

7.2.3 Disclosure and Consultation Methods

Disclosure of relevant project information will help Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. Providing stakeholders with complete, accurate and understandable information is essential to allow meaningful participation. Where appropriate, all written project information will be disclosed in English and Uzbek. Consultation methods provide a mechanism for stakeholders to provide feedback and share their concerns, complaints or suggestions about the Project.

7.2.3.1 Online Disclosure

Online disclosure allows for quick and free access to documents for all stakeholders that have internet. Documents disclosed online will be disclosed at a website created for this purpose by Nur Navoi. The following documentation will be publicly disclosed:

- Preliminary ESIA;
- Draft Stakeholder Engagement Plan (this document);
- Final ESIA/OVOS approved by the national authorities and the lenders if applicable, and conditions of approval established in the permits, if any);
- Non-technical summary of the ESIA;
- Environmental and Social Action Plan;
- Framework Environmental and Social Management Plan; and
- Executive Summary of independent, external compliance audits.

7.2.3.2 Disclosure of hard copies

Disclosure of printed documents at key locations (e.g. local government buildings). Hard copies will be provided free of charge. The following documentation, as a minimum, will be provided:

- Preliminary ESIA
- Non-technical summary of the final ESIA approved by the national authorities and the IFC, and conditions of approval established in the permits, if any);
- Consultation Meetings (MoMs), and
- Executive Summary of independent, external compliance audits.

7.2.3.3 Consultation through open meetings

Open meetings allow for stakeholders to share their views and opinions, promoting transparency as all stakeholders can see that the same information is shared with everybody and community members can learn about the position of their representatives. Any individual that goes to a meeting will be allowed to attend and share his/her concerns.

An initial presentation will disclose all relevant information to the attendees, in a visual and oral manner, to ensure that illiterate attendees get all the information. A significant amount of time in the meeting has to be allowed for the stakeholders to express their views. Every point raised by the stakeholders will be replied to and all comments, questions and answers will be minuted.

If any assistance is required to attend a public meeting, Nur Navoi will take the necessary measures to ensure that they can attend or to provide the relevant information and gather their feedback.

All meetings will be conducted in Uzbek. Consultation meetings will be conducted for the ESIA phase and at regular intervals by the CLO (such as every 2 months during construction and yearly during operation).

7.3 Recording and Tracking of SEP

Transparent documentation of engagement activities will enable Nur Navoi to track stakeholders' perceptions and concerns regarding the development of the Project and facilitate the identification of additional stakeholders and stakeholder groups for Nur Navoi to undertake engagement.

In addition, monitoring results, both qualitative and quantitative, will be disclosed to stakeholders on at least a quarterly basis.

Suggested monitoring and evaluation activities are outlined below:

- Monitor the grievance register in terms of response times to address complaints lodged as well as the recurrence of complaints over time.
- Monitor media coverage of Nur Navoi.
- Keep records of all engagement activities including meetings attended, community meetings, focus group discussions, etc.
- Keep copies (electronic or hard copy) of all communication material.
- Conduct stakeholder interviews to gauge level of satisfaction.
- Develop and assess performance in terms of Key Performance Indicators (KPIs). Some suggested KPIs include:
 - Number of engagement activities facilitated quarterly - by stakeholder group and engagement type;
 - Number of attendees at stakeholder engagement activities (expected vs actual); and
 - Number of grievances received per quarter.
- Revise plans and activities.

8. Grievance Mechanism

A key requirement of the IFC is the establishment and communication of an effective and adequate Grievance Mechanism. Effective implementation of a Grievance Mechanism is crucial to the management of grievances from the local community and other stakeholders. It is an integral part of the SEP and engagement process and should be reflective of the scale of impacts and expected risks of the Project.

8.1 Overview

Local people need a trusted way to voice and resolve concerns linked to a project's operations. A locally based grievance resolution mechanism provides a promising avenue by offering a reliable structure and set of approaches where local people and the company can find effective solutions together. Nur Navoi will develop and implement a grievance mechanism which:

- Increases the likelihood that small disputes can be brought to a conclusion relatively quickly before they become deep-seated grievances
- Keeps ownership of the dispute in the hands of local people
- Offers an early, efficient, and less costly way to address concerns
- Promotes a more stable business climate for companies that reduces risk and enhances accountability to the host community.

A successful grievance mechanism can help achieve the following goals:

- Open channels for effective communication
- Demonstrate that a company is concerned about community members and their well-being
- Mitigate or prevent adverse impacts on communities caused by company operations
- Improve trust and respect
- Provide structures for raising, addressing, and resolving issues that reduce imbalances in power
- Promote productive relationships
- Build community acceptance of a company's "social license" to operate.

AECOM, on behalf of Nur Navoi, has developed a grievance mechanism for the Project in accordance with IFC's Performance Standards and Guidance Notes which present various principles and good practice measures on grievance mechanisms. These include:

- Establish a procedure for receiving, recording or documenting and addressing complains that is easily accessible, culturally appropriate, and understandable to affected communities.
- Inform the affected communities about the mechanism during the company/community engagement process.
- Consider when and how to seek solutions to complaints in a collaborative manner with the involvement of the affected community.
- Address concerns promptly, using an understandable and transparent process that is readily accessible to all segments of the affected communities—and at no cost and without retribution.
- Ensure full participation of both genders and vulnerable groups.
- Take into consideration customary and traditional methods of dispute resolution when designing the system.
- Assign consistent, experienced, and qualified personnel within the company with responsibility for receiving and responding to grievances.
- Establish a redress mechanism so those who feel their grievances have not been adequately addressed have recourse to an external body for reconsideration of their case.
- Document grievances received, and responses provided and report back to the community periodically.

- Provide periodic reports on issues that the grievance mechanism has identified as of concern to those communities.

The Performance Standards and Guidance Notes emphasize that a grievance mechanism should help Nur Navoi understand the community’s perception of project risks and impacts so as to adjust its measures and actions to address the community concerns.

The objective of Nur Navoi’s grievance procedure is to ensure that all comments and complaints from people directly affected by the Project, including local communities, farmers and their families are processed and considered in an appropriate way. Furthermore, the grievance mechanism should contain the corrective actions needed to be implemented in relation to complaints received with guarantees that the complainant is being informed of the outcome. The means by which stakeholders may make comments and complaints must be appropriate to their culture. At all times, Nur Navoi will accept comments and complaints concerning the Project in both verbal and written formats.

8.2 Principles

The United Nations Guiding Principles (UNGP) on Business and Human Rights lists several “effectiveness criteria” for the successful implementation of a Grievance Mechanism. The UNGP states that it should always be:

- Legitimate: it must have a clear transparent and sufficiently independent governance structure to ensure that no party to a grievance process can interfere with the fair conduct of that process;
- Accessible: it must be publicised to stakeholders who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers to access, including language, literacy, awareness, finance, distance, or fear of reprisal;
- Predictable: it must provide a clear and known procedure, with time frames for each stage; clarity on the types of process and outcome it can (and cannot) offer, and means of monitoring the implementation of any outcome;
- Equitable: it must ensure that aggrieved stakeholders have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms;
- Rights-compatible: it must ensure that its outcomes and remedies accord with internationally recognised human rights standards; and
- Transparent: it must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

8.3 Examples of Grievances Typically Encountered

The following table provides examples of the types of grievances that are typically encountered on a major construction project such as this.

Table 8-1: Types of Grievances

Type	Complainant(s)	Examples	Risk Level
Relatively minor and onetime problems related to company operations	An individual or family	A company truck damaging a community member’s fence; a one-time disrespectful encounter between a company employee and a community member	Minor
Relatively minor but repetitive problems related to company operations	An individual or family or small group of people	Livestock getting loose because company employees fail to close gates	Minor/Moderate

Relatively minor but repetitive and widespread problems	Multiple individuals, families, or larger groups	Company-related road traffic raising dust that settles on clothes hung out to dry	Moderate
Significant and larger repetitive problems	Community groups, non-governmental or community-based organizations, or local governments	Company blasting allegedly causing structural and/or aesthetic damage to building	Significant
Major claims that company activities have resulted in significant adverse impacts on larger populations of people	Community groups, nongovernmental or community-based organizations, or local governments	Company operations adversely impacting a community's water supply, making it unsafe for drinking, livestock, and/or irrigation	Major
Major claims over policy or procedural issues	Non-governmental organizations, community groups or community-based organizations, or local governments	A company's noncompliance with its own policies; failure to follow guidelines of multilateral lenders for adequate consultation to achieve prior and informed consent; inadequate resettlement and compensation of affected populations	Major

8.4 Community Expectations

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem
- An honest response to questions about company activities
- Modification of the conduct that caused the grievance
- Some other fair remedy (options include: an apology /compensation)

In voicing their concerns, they also expect to be heard and taken seriously. Finally, Nur Navoi, contractors, or government officials must encourage people that they can voice grievances and work to resolve them without retaliation. Stakeholders are to be informed that the grievance mechanism can be used to submit complaints anonymously.

8.5 Responsibilities

The grievance mechanism implementation team shall be comprised of the HSE Managers from Nur Navoi and/or Masdar, the EPC Contractor and the CLO. Clear lines of responsibility and accountability will be established within the implementation team.

It is important that all members of the team are adequately trained in stakeholder engagement.

It is important that the CLO be a local person, who is fluent in both English, Russian and Uzbek and familiar with the local customs.

Any person or organisation may send comments and/or complaints in person or via post, email, or facsimile using the contact information provided in Table 8-2.

Table 8-2: Responsible Persons and Contact Details

Masdar	Nur Navoi Solar FE LLC
To be confirmed	To be confirmed
EPC Contractor	Community Liaison Officer (CLO)
To be confirmed	To be confirmed

In addition to the above contact details, a mailbox will be provided at the site entrance to allow local people to raise grievances in a more informal way.

Grievance boxes will also be placed in each surrounding project community. This is most likely to be at the local community building (TBC).

8.6 Implementation of the Grievance Mechanism

It is important to reiterate that the aim of the grievance mechanism is to establish a system to receive and facilitate resolution of the stakeholder’s concerns and grievances about the project’s environmental and social performance. The grievance mechanism has the Affected Communities as its primary beneficiaries. It seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism will not impede access to judicial or administrative remedies. The stakeholders will be informed and consulted about this grievance mechanism during the stakeholder engagement process undertaken for the ESIA. The grievance mechanism will be actively publicised during the lifecycle project.

The grievance mechanism for the project will comply with the following principles:

- Clarify at the outset what is the purpose of the procedure;
- Assure people that there will be neither cost nor retribution associated with lodging a grievance;
- The entire process (i.e. how a complaint is received and reviewed, how decisions are made and what possibilities may exist for appeal) will be made as transparent as possible by putting it into written form, publicising it and explaining it to relevant stakeholders.

The grievance mechanism will be published at different locations and through letters to the authorities and clarifying that everyone is welcome to make use of it. All information about grievance procedures, grievance forms, and responses will be available in Russian and in Uzbek. Access to the mechanism will be free of cost.

Raising a complaint can pose risks for people, especially if it concerns issues such as corruption, misconduct, compensation, or if it interferes with local social norms, including gender norms. The grievance mechanism will include precautions such as a clear non-retaliation policy, measures to ensure confidentiality and safeguarding of the personal data collected in relation to a complaint, as well as an option to submit anonymous grievances.

Handling grievances encompasses a step-by-step process as well as assigned responsibilities for their proper completion.

Nur Navoi will follow the process’ steps discussed in the sections below.

8.6.1 Publicizing Grievance Management Procedures

The grievance mechanisms will be publicized in the following ways:

- Posters (project site, local Council, current Farm A and B users, and residential clusters within a 5 km buffer from the site);
- Future consultation meetings;
- Letters to the local and provincial authorities, and Online (website).

The information provided online and on printed material will include at least the following:

- What project-level mechanisms are capable of delivering and what benefits complainants can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e. all stakeholders);
- Where, when, and how community members can file complaints;
- Who is responsible for receiving and responding to complaints (i.e. the CLO);
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

8.6.2 Submitting a Complaint

- The grievance mechanism will allow for complaints to be filed in several ways:
- By post;
- Online: By email and/or through an online form;
- At the project gate;
- At the Mailboxes (project gate or at the communities), and
- During meetings with the Community Liaison Officer.

Written and verbal complaints will be received at the project's gate – therefore the security personnel have to be aware and trained to deal with the complaint appropriately. The security personnel should communicate that a stakeholder wants to submit a grievance to the CLO. For illiterate complainants or those that prefer to submit their complaints verbally, the CLO will meet them at the company's gate (or could offer them to go into the company's offices, depending on security restrictions) and will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured.

8.6.3 Receiving and Logging a Grievance

8.6.3.1 Receiving Complaints

Nur Navoi will publicly commit to a certain time frame in which all recorded complaints will be responded and to ensure that this response time frame is enforced. By letting people know when they can expect to be contacted by company personnel and/or receive a response to their complaint their frustration may be reduced.

The following points receipt procedure rules will be followed for grievances:

- All incoming grievances will be acknowledged as soon as possible, no later than a week from receipt. A formal confirmation—with a complaint number, or other identifier, and a timeline for response— assures the complainant that the organization is responding properly, and it gives the project a record of the allegation. As a good practice, complaints received in person will be acknowledged on the spot;
- If a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe;
- Nur Navoi will explain in the first letter of acknowledgment, which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.

8.6.4 Reviewing and Investigating Grievances

To ensure that all grievances are adequately investigated and closed out, a grievance log will be kept, documenting all the actions taken to address each grievance.

An extensive investigation may be required when grievances are complex and cannot be resolved quickly. Nur Navoi will take full responsibility for investigating the details of grievances coming through its grievance mechanism, following the principle of “no cost”.

In cases of sensitive grievances - such as those involving multiple interests or displacement issues - it may help to engage outside organizations in a joint investigation, or allow for participation of local authorities, only if the complainants agree to this approach.

For complex grievances, an investigation team will have to be appointed. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget.

Meetings with complainants and site visits can be useful for grievance investigation and will be undertaken, as appropriate.

Complainants will be informed weekly of the status of their grievance.

All grievances received will be captured in Grievance Forms which will then be forwarded to the Nur Navoi HSE Manager. The grievance will be registered in a grievance tracker in order to track and monitor actions taken against the grievance. Each complaint will be assigned an individual number to ensure that it is appropriately tracked and closed out.

It is important that the process is easily accessible and not intimidating to stakeholders.

8.6.4.1 Acknowledge Grievance

Nur Navoi will acknowledge receipt of the grievance in writing and verbally and will provide information on the proposed steps and the anticipated timeframes required to resolve the grievance.

This acknowledgement will be provided to the complainant within five (5) days of receiving the grievance or within 24 hours in the event of an urgent concern which is deemed to have the potential to result in personal injury.

If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant.

It is suggested that literacy levels are taken into consideration when providing the complainant with the acknowledgement of receipt, and verbal acknowledgement should accompany a written acknowledgement.

Where appropriate, acknowledgement should be provided through the CLO.

8.6.4.2 Assessing the Grievance

During the assessment, the team gathers information about the case, key issues and concerns, and helps determine how the complaint might be resolved. Nur Navoi will:

- Determine who will conduct the assessment. Typically, the Nur Navoi HSE Manager will perform this task or directs it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a company member (typically the CLO) to engage directly with the complainants to gain a first-hand understanding of the nature of the complaint.
- Clarify the parties, issues, views, and options involved:
 - Identify the parties involved.
 - Clarify issues and concerns raised by the complaint.
 - Gather views of other stakeholders, including those in the company.
 - Determine initial options that parties have considered and explore various approaches for settlement.
- Classify the complaint in terms of its seriousness (minor, significant or major). Seriousness includes the potential to impact both the company and the community.

Issues to consider include the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue. A complaint's seriousness is linked to who in the company needs to know about it and whether senior management is advised.

Rather than resorting to a purely unilateral "investigate, decide, and announce" strategy, engage more directly with the complainant in the assessment process, and involve the complainant in influencing the resolution process to be selected, and settlement options.

8.6.5 Grievance Resolution Options and Responses

One of the potential advantages of a grievance mechanism is its flexibility. Rather than prescribe a specific procedure for each particular type of complaint, a list of possible options appropriate for different types of grievances will be provided. Options may include altering or halting harmful activities or restricting their timing and scope (e.g. for construction noise), providing an apology, replacing lost property, providing monetary compensation, revising the community's engagement strategy, and renegotiating existing commitments or policies.

The grievance investigation team will provide a proposal to resolve the complaint, which will have the backing of the Senior Management. The HSE Manager will then contact the complainant to get an agreement on the proposed solution.

If all parties accept the proposed solution, the agreed actions will be implemented in the established timeframe. In the case that complainant does not accept the proposed resolution, Nur Navoi should re-assess the situation and make sure that all alternatives within the grievance mechanism are explored. If agreeing on a solution acceptable to all parties is not possible within the grievance mechanism, the complaint will be referred to external mechanisms.

Close-up monitoring of a complaint will be undertaken, if possible, by collecting proof that the necessary actions have taken place. For example:

- If the issue was resolved with the satisfaction of the complainants, get a confirmation and file it along with the case documentation, and
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how these were resolved

The system for responding to the complainant should specify who communicates and how. In some cases, it may be appropriate that feedback be provided by the staff member responsible for assessment accompanied by the coordinator of the complaints procedure.

The Nur Navoi HSE Manager may participate in feedback, depending upon the seriousness of the complaint.

When formulating a response Nur Navoi will ensure that:

- The complaint coordinator or relevant department may prepare the response. The response should consider the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.
- To present and discuss the response to the complainant, consider holding a meeting with the complaint coordinator, relevant company manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator. The group would also discuss appropriate next steps during this meeting. If the proposal is a settlement offer and it is accepted, the complaint is resolved successfully and there is no need to proceed to the next step of selecting a resolution approach. If the complainant is not happy with the response about a resolution process or substance, the group should try to reach an agreement that would be mutually acceptable.
- If the case is complex and a resolution time frame cannot be met, provide an interim response—an oral or written communication—that informs the person of the delay, explains the reasons, and offers a revised date for next steps.

All comments and complaints will be responded either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form.

Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

Nur Navoi will respond to the complaint within one week. It is possible that some responses may take longer than one week to implement, but even in those instances Nur Navoi will inform the complainant what actions will be taken and when.

8.6.6 Sign-off on a Grievance

Nur Navoi will seek sign-off from the complainant(s) that the grievance has been resolved. This will be achieved via a Grievance Resolution document.

All grievances are to be signed off at an appropriate level of seniority of staff. The staff member who signs off the complaint should have sufficient knowledge about the topic to provide assurance.

Once sign-off has occurred, this will be recorded in the Grievance Form.

Any grievances not signed-off as resolved will be investigated further.

8.6.7 Monitoring and reporting of grievance mechanism

The grievance mechanism will be monitored and evaluated annually. Suggested monitoring and evaluation activities are outlined below:

- Monitor the grievance log in terms of response times to address complaints lodged as well as the recurrence of complaints over time.
- Gauging level of stakeholder satisfaction as a secondary aspect to other stakeholder engagement meetings.
- Monitor media coverage of Nur Navoi.
- Keep records of all engagement activities including meetings attended, community meetings, focus group discussions, etc.
- Keep a library (electronic or hard copy) of all communication material.
- Conduct stakeholder interviews to gauge level of satisfaction.
- Develop and assess performance in terms of Key Performance Indicators (KPIs).
- Revise plans and activities.

Nur Navoi will report internally at least once a month on grievances received (both open and closed), and how they were resolved.

8.6.8 Grievances Received to Date

All grievances received to date are logged in the Grievance Tracker.

The following grievances have been received to date. This section will be reviewed and updated throughout the project.

Table 8-3 Grievances received to date

Date	Grievance	Action Taken

