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Stakeholder Engagement Plan (SEP)

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Technical Report



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B3	15/07/2021	Updated to reflect Lenders comments.	Client issue.

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1 Introduction

This document is a Stakeholder Engagement Plan (SEP) developed by Wood on behalf of Masdar, describing the key stakeholders and the information and communication plans intended in regard to the Zarafshan Wind Farm located to the east of Zarafshan City in the Tamdy (also referred to as Tomdi) district of Uzbekistan. The Project will include up to 111 wind turbine generators (WTGs) with an individual capacity of 4.5 MW, hub height of 95 m and to tip height of 172.5 m. The total capacity of the Project will be up to 500 MW. Masdar will own and operate the Project which is currently in the pre-construction stage.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that Masdar will adopt in relation to the Project. The overall approach for the SEP and the wider Environmental and Social reporting have been based on the Equator Principles (EPs), the International Finance Corporation (IFC) Performance Standards (PSs) and the European Bank for Reconstruction and Development (EBRD) Performance Requirements (PRs).

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goals are; to ensure that adequate and timely information is provided to Project-affected people and other stakeholders, to allow groups to have sufficient opportunity to voice their opinions and concerns; and, ensure that these concerns influence Project decisions.

The SEP is a “live document” and will be reviewed and updated as necessary during the construction stage, and then updated again during the operational and decommissioning stage. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during Project implementation and updated as necessary.

The specific objectives of the SEP are detailed below.

The methods, procedures, policies and actions undertaken by Masdar to inform stakeholders, in a timely manner, of the potential impacts of the Project are the key subject of this document.

A level of stakeholder engagement has already taken place during the ESIA Scoping Stage of the Project and a summary of stakeholder engagement outcomes is presented in the SEP.

Communication will continue during the ongoing pre-construction stage, throughout construction and during operation.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact Masdar and ask to be included in future communications/engagement opportunities. Furthermore, this document describes the way in which any concerns or grievances will be handled by Masdar.

The SEP 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.

This document contains the following sections:

- Chapter 2 – Project description.
- Chapter 3 – Roles and responsibilities.
- Chapter 4 – Regulations and requirements.
- Chapter 5 – Identification of stakeholders.
- Chapter 6 – Public consultation and disclosure undertaken to date.
- Chapter 7 – Future stakeholder engagement.
- Chapter 8 – Monitoring and reporting.
- Chapter 9 – Grievance mechanism.

2 Project Description

The main Project area is located within the Kyzylkum desert, on a plateau which forms the boundary of the site.

The Project land is State-owned. Farming entities in Uzbekistan possess different rights to land: from long-life inheritable rights of the dehkans (small-scale household farms) to rights limited by 30 to 50 years and defined by lease contracts of the private farmers. The entire Project site is identified as being used for rough grazing of sheep and goats with additional grazing of camels recorded.

There are no permanent waterbodies on the site however a number of seasonal drainage channels exist.

The site location is shown in Figure 2-1. It is located approximately 7 km east of Zarafshan City on an elevated plateau and extending into a more ridged topography in the north and the west. The elevation rises from 425 m above sea level (asl) at the centre of Zarafshan to 750 m asl on the plateau. The plateau forms the boundary of the Project site.



Figure 2-1: Project Location (blue markers represent WTG locations)

The proposal is for the construction, operation, and decommissioning of a wind farm comprising the following components:

- Access road from paved highway (A739) to the Project site.
- Grid connection and substation building.
- On-site access roads from the control centre to the WTGs and underground cables to carry electricity from the WTGs to the control centre sub-station.
- Construction compound.
- Workers' accommodation area.
- Maximum of 111 x 4.5 MW WTGs.
- Two short overhead lines (OHLs) from substations to the National Grid within the Project area.

The candidate WTG is the Goldwind GW155- 4.5 MW WTG (with dimensions to be confirmed). The WTGs will be of standard three bladed design.

The WTGs are expected to have a design life of 20 to 25 years and the normal operating life of the Project would be expected to be 20 to 25 years.

2.1 Project Benefits

The Project will have direct local benefits through increased employment opportunities and training for the local population during construction (and, to a lesser extent, operation). This may enhance the local economy providing increased income levels. Furthermore, the presence of construction workers in the Project area may enhance the local economy through purchase of local goods.

During construction, workers would include skilled (heavy equipment operators, engineers and overseers, wind experts) and unskilled (labourers, cooks, etc.). It is anticipated that the Project team will comprise a number of experienced foreign technicians and engineers however local labour will be utilised as far as possible.

Masdar estimate that between 250 and 500 low-skilled (category 1) local people and between 250 and 500 skilled (category 2) workers will be required during construction. To the extent possible, category 2 workers will be recruited within the Tomdi District through advertisement outlets active at a district level only. However, given that this is the first wind farm development in the country, it is likely that skilled workers from elsewhere in the country will be needed.

Additionally, it is expected that during construction, local materials suppliers/traders for sand, cement, steel, stone aggregate and general transportation services may benefit from this Project.

The Project is also expected to improve the condition of road infrastructure in the area through upgrade / construction of roads associated with the construction and operational phases.

3 Roles and Responsibilities

Responsibilities of parties of the Zarafshan Wind Farm Project are presented below.

The Project proponent is Masdar.

Masdar has the overall responsibility of developing, reviewing, and updating the SEP and ESMP. Masdar will also be responsible, as the Project Developer, for day-to-day management and implementation of the SEP, ESMP and relative contract obligations of the contractors. It will also on a regular basis, monitor and audit the implementation of the SEP and ESMP. Masdar will provide appropriate training for their staff in relation to implementing the SEP and ESMP.

The Engineer, Procure and Construct (EPC) contractor will carry out the detailed Project design, source plant and materials and construct the Project. Given the role in the Project, the EPC Contractor shall have the responsibility of managing the HSE performance of the majority of the workforce. The EPC contractor and all sub-contractors shall comply with the provisions of the SEP and any subsequent revisions.

The Lenders and Shareholders will require compliance with the respective international standards as set out below.

3.1 Masdar Contact Details

To be confirmed.

4 Regulations and Requirements

The Project is committed to implementing all Project-related stakeholder engagement activities in accordance with the Asian Development Bank (ADB) Safeguard Policy Statement, IFC PSs and EBRD PRs, considered best practice for industrial developments; and with the EPs which represent a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risk in project financing.

The EPs apply to all new project financings with total capital costs of USD \$10 million or more across all industry sectors globally. The EPs represent a framework for project financing, which is underpinned by the revised IFC Environmental and Social Review Procedures (ESRPs) (July 2007), the revised IFC Social and Environmental Sustainability and PSs, new Sustainability Policy, and Disclosure Policy (effective 21 February 2006).

The extent to which the EPs apply to a project depends on whether the country in which the project is located is "Designated" or "Non-Designated". Projects within Non-Designated countries such as Uzbekistan are required to follow the standards and guidelines as set out in the IFC PSs and Environmental Health and Safety Guidelines.

The relevant aspects of these project requirement frameworks are highlighted below.

4.1 International Standards

Consultation and disclosure of information is a key part of the Project implementation process. The consultation principles align with the relevant Equator Principles, ADB Safeguard Policy Statement, IFC PSs and EBRD PRs, with the aim to ensure all reasonable public opinions are adequately considered.

4.1.1 Equator Principles

Equator Principle 5 (Consultation and Disclosure) requires the Project to undertake a process of consultation with affected communities in a manner that provides them with opportunities to express their views on Project risks, impacts, and mitigation measures, and allows the Sponsor to consider and respond to them. The consultation process should be undertaken in a manner that is inclusive, culturally appropriate, free from intimidation, timely and informed.

Equator Principle 6 (Grievance Mechanism) requires that a grievance mechanism must be developed which allows Project-affected parties to raise grievances to either the Sponsor or a third party who will seek to resolve the grievance as appropriate.

4.1.2 ADB Safeguard Policy Statement

Consultation and participation are central to the achievement of safeguard policy objectives. ADB's existing safeguard policies (2009) have varying consultation requirements. They all imply the need for prior and informed consultation with affected persons and communities in the context of safeguard planning and for continued consultation during project implementation to identify and help address safeguard issues that may arise. Section 1, Environmental Safeguards, details the following Policy principle:

*"Carry out meaningful consultation with affected people and facilitate their informed participation. Ensure women's participation in consultation. Involve stakeholders, including affected people and concerned nongovernment organizations, early in the project preparation process and ensure that their views and concerns are made known to and understood by decision makers and taken into account. Continue consultations with stakeholders throughout project implementation as necessary to address issues related to environmental assessment. Establish a grievance redress mechanism to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental performance."*¹

4.1.3 IFC Performance Standards

The IFC Stakeholder Engagement: A Good Practice for Companies Doing Business in Emerging Markets (2007) provides an outline of the core principles to be applied to achieve effective stakeholder engagement, which will be adopted for this Project. These are:

- Commitment is demonstrated when the need to understand, engage and identify the community is recognised and acted upon early in the process.
- Integrity occurs when engagement is conducted in a manner that fosters mutual respect and trust.
- Respect is created when the rights, cultural beliefs, values and interests of stakeholders and neighbouring communities are recognised.
- Transparency is demonstrated when community concerns are responded to in a timely, open and effective manner.

¹ADB Safeguard Policy Statement (2009) <https://www.adb.org/sites/default/files/institutional-document/32056/safeguard-policy-statement-june2009.pdf>

- Inclusiveness is achieved when broad participation is encouraged and supported by appropriate participation opportunities.
- Trust is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

IFC Performance Standard 1 (2012) provides a summary of the requirement for disclosure:

"Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The client will provide Affected Communities with access to relevant information on:

- (i) the purpose, nature, and scale of the project;*
- (ii) the duration of proposed project activities;*
- (iii) any risks to and potential impacts on such communities and relevant mitigation measures;*
- (iv) the envisaged stakeholder engagement process; and*
- (v) the grievance mechanism."*

IFC Performance Standard 1 provides a summary of the requirement for Informed Consultation and Participation (ICP):

"For projects with potentially significant adverse impacts on Affected Communities, the client will conduct an ICP process that will build upon the steps outlined above in Consultation and will result in the Affected Communities' informed participation. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The consultation process should (i) capture both men's and women's views, if necessary, through separate forums or engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. The client will document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the Affected Communities and will inform those affected about how their concerns have been considered."

IFC Performance Standard 1 [36] outlines the requirement for period reporting back to stakeholders:

“The client will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. If the management program results in material changes in or additions to the mitigation measures or actions described in the Action Plans on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.”

4.1.4 EBRD Performance Requirements

Performance Requirement 10 promotes the principle of strong stakeholder engagement as a focal point to achieve and build strong, constructive and responsible relationship essential for the successful management environmental and social impacts and issues.

The overall objectives of the PR 10 are to:

- Outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders, in particular with directly affected communities.
- Promote improved environmental and social performance of clients through effective engagement with the project’s stakeholders.
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to the project’s stakeholders.
- Ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

The goal of consultation is to ensure that adequate and timely information is provided to interested parties and to those potentially affected by Project and policies that guide operations, and that these groups are given sufficient opportunity to voice their opinions and concerns.

Stakeholder engagement should be conducted on the basis of providing local communities that are directly affected by the project and other relevant stakeholders, with access to timely, relevant, understandable and accessible information, in a cultural appropriate manner, free of manipulation, interference, coercion and intimidation.

The engagement of stakeholders shall incorporate the following elements:

- Stakeholder identification and analysis.
- Stakeholder engagement planning.
- Disclosure of information.
- Consultation and participation.
- Grievance mechanism.
- Ongoing reporting to relevant stakeholders.

The nature and frequency of stakeholder engagement shall be commensurate to the project scale and avoid engagement fatigue. Projects that could result in potentially significant adverse future environmental and social impacts which cannot readily be identified require a participatory ESIA process, which is the case for this Category A Project. The project shall be driven by engaging stakeholders in a scoping process with interested parties and identified stakeholders at an early stage to ensure early identification of key issues to be addressed.

Regular reports to interested stakeholders are to be provided on the environmental and social performance as a separate publication. These reports should be available and accessible to the affected communities.

Resources for public information and engagement should focus on affected parties with a particular attention to those that may be differentially affected by the project because of their disadvantaged or vulnerable status.

The EBRD PR10 requires that engagement continues during project implementation, meaning throughout the project cycle, and that a grievance mechanism is established to receive and facilitate resolution of stakeholders' concerns and grievances.

5 Identification of Stakeholders

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation during the ESIA process, taking into consideration the range of engagements that have already been completed. Stakeholder identification is an ongoing process, and potentially new stakeholders will continue to be identified during different stages of the Project.

5.1 Stakeholder Mapping and Defining the Area of Influence

Stakeholders for the ESIA were identified through the following steps:

- The geographical area of influence (as defined by ADB, IFC and EBRD) was analysed to map areas that may be directly or indirectly affected for specific topic areas. The combined area identified reflects the Project's Area of Influence (AOI). Full details are set out in the ESIA however this includes consideration of the following aspects:
 - a. Air quality (e.g. potential area experiencing increased vehicle emissions and dust levels during construction).
 - b. Noise (e.g. potential area experiencing increased noise levels during construction and operation).
 - c. Shadow Flicker (e.g. potential area experiencing shadow flicker during operation).
 - d. Visual (e.g. areas with significant visual impacts associated with the Project during construction and operation).
 - e. Ecology, biodiversity and ecosystem services (e.g. the physical footprint of the Project from the clearance of vegetation).
 - f. Community health, safety & wellbeing (e.g. transportation routes, geographical area where workers could interact with local community).
 - g. Land use (e.g. land that may be temporary/permanently used by the Project).
- Existing secondary data on environmental and social conditions within the Project AOI was reviewed, to identify the presence of possible environmental and social sensitivities. Information sources used include the latest satellite imagery from Google Earth, and local knowledge from Wood's local consultant who has extensive experience of working in the region.
- Stakeholders were subsequently discussed at a stakeholder engagement session held with Wood's local consultant.

- A social mapping exercise was undertaken in March / April 2021 involving GIS analysis and consultation using a local specialist to identify farmers who utilise the Project site.

5.2 Stakeholder Identification

For the purposes of the Project, a stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the Project and its potential impacts. The objective of stakeholder identification is therefore to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the Project.

As a part of the development of the public consultation program for the ESIA, stakeholder identification was performed in order to determine all individuals, local communities, organizations, educational, research, and design organizations, and governmental authorities who might be potentially affected by, or might affect the outcome of, the proposed Project. The criteria used in the stakeholder identification process included the proximity of local residents' households to the Project site, the level of potential interest in the Project among federal and local governmental authorities, and scientists and local/international NGOs with interest.

The following stakeholder groups were defined during the identification process:

- Government agencies related to the Project's approval and review.
- Non-governmental organizations (NGOs) including Professional associations and Public organizations.
- Local communities.

Stakeholder identification is an ongoing process, requiring regular review and updating of the stakeholder database as the Project proceeds. A summary of the various stakeholder groups is provided below.

5.3 Government Agencies

5.3.1 Regulatory Authorities

National and regional Government agencies are important stakeholders within the Project's engagement process, both as sources of information, and as those issuing the necessary permits for the Project. It is therefore important to engage with all appropriate regulators from an early stage and to maintain relationships with these agencies throughout the Project lifecycle. The following regulatory authorities were identified for consultations:

- Uzbekistan Government Ministries:
 - Ministry of Investments and Foreign Trade.
 - Ministry of Health.
 - Ministry of Transport.
- Regional Government Representatives:
 - Khokimiyat of Navoi city.
 - Investment Department of Navoi.

5.3.2 Other Local and District Authorities

The Project falls within the Zarafshan City area of the Navoi Region in Uzbekistan. The following local stakeholders were identified:

- Khokimiyat of Zarafshan City.
- Cadastral department of Zarafshan City.
- Zarafshan City department of State Committee for Nature Protection (SNCP).
- Zarafshan City geology and mineral resources.
- Zarafshan City Electrical Networks.
- Zarafshan airport administration.
- Khokimiyat of Tamdy district.
- Cadastral department of Tamdy district.
- Zarafshan City department of SNCP of Tamdy district.
- Zarafshan City geology and mineral resources.

5.4 National and International Non-Governmental Organisations (NGOs)

Key national and international NGO stakeholders include:

- Birdlife International.
- NGO Working Group on Climate Change.

5.5 Local Groups operating within the Community

Other local community groups and charitable organizations operating within the Project area are shown in Table 5-1 below. Note that the groups identified are active across all Project areas.

Table 5-1: Local Community, Charitable Organizations, and other Organizations

No.	Name of Group	Roles & Responsibilities
1.	NGO 'Society of Disabled People' (Kanimekh, Navoi region)	To increase the role, opportunities and protect the rights of disabled people, women and youth in the Navoi region. The organisation was created in 2013 and registered under No.122 by the Department of Justice of the Administrator of the Navoi region.
2.	Youth Centre NGO "Timaris" (Kanimekh, Navoi region)	To assist in increasing the role and activity of disabled people, women and youth in the Navoi region, by involving them in social, economic and cultural life of the region.

5.6 Communities and Community Leaders

Chairmen and Chairwomen of local communities (Village Councils) shall be engaged on a regular basis in a discussion of all aspects of the Project that may impact on their community, lands and other assets. Meetings with these groups shall follow local practices and norms.

Masdar will make reasonable efforts to verify that such persons do, in fact, represent the views of affected communities and that they are facilitating the communication process by communicating the information to their constituents and conveying their comments to Masdar, as appropriate.

The settlements/mahallas of Zarafshan city, Tamdy district and respective settlements: Muruntov, Tomdibulak, Yangi Tomdi, Rokhat, Kazbek bi, Jingildy, Azhyrykti, Kynyr will be consulted.

The following residents most likely to be impacted by the Project are:

- Land-users, including farmers and others whose access to land may be disrupted by the Project.
- Any households located in the zone of shadow flicker impact.
- Any households located in the zone of elevated noise levels.
- Any households or land users located in areas susceptible to increased dust levels.
- Any households or communities located along transport route who may experience disturbance, increased noise and nuisance and health and safety impacts.

5.6.1 Vulnerable Groups

During the social surveys carried out in 2020, questions were asked about the types of vulnerable people that are present within the Project area, and the sources of their vulnerability. The following groups were identified:

- Families currently living in poverty.
- The disabled who often require additional support for daily living.
- The retired, elderly (in particular, elderly men) who often require additional support for daily living.

6 Public Consultation and Disclosure Undertaken to Date

A summary of stakeholder engagement activities completed with local stakeholders during preparation of the ESIA is presented in this chapter along with details of the key discussion points.

Due to COVID-19 restrictions, consultation in 2020 was carried out as a mix of remote / online discussions and small group discussions, in accordance with Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19 (May 2020)² and in country Government advice.

At the start of each meeting, a broad overview of the Project was provided alongside details of the purpose of the specific meeting or focus group discussion. The term 'mahalla' used in Table 6-1 refers to an urban neighbourhood within a larger urban settlement.

Stakeholder engagement has been completed with the following:

1. Teachers of primary school №5 in Muruntov.
2. Teachers of secondary Schools №10, Zarafshan.
3. Chair of Mahalla Yangi area, Zarafshan.
4. Chair of mahalla and family department, Zarafshan.
5. Women of Yangi, Zarafshan.
6. Community leaders, Jingildy village.
7. Women of Jingildy village.
8. Farmer, Kynyr village.
9. Women, Kynyr village.
10. Community leaders, Tamdybulak.
11. Women, Tamdybulak and Kazbekbi villages.
12. Teachers of a secondary School № 4, Tamdybulak.
13. Community leaders, Ajiriqti village.
14. Teachers of a secondary School №1, Ajiriqti village.
15. Farmer, Ajiriqti village.
16. Women, Ajiriqti village.
17. Community leaders, Yangi Tamdy village.
18. Teachers of a secondary School №25, Yangi Tamdy village.

² https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_tipsheet_covid-19_stakeholderengagement

19. Teachers of a secondary School №18, Rokhat village.
20. Community leaders, Rokhat village.
21. Community members, Mahalla Alisher Navoi, Zarafshan.
22. Director of Youth Centre NGO Timaris, Kanimekh district, Navoi.
23. Director of the Society of Disabled People of Kanimekh district, Navoi region.
24. Zarafshan city Khokimiyat (a Khokimiyat is local government administration unit).
25. Tamdy District Khokimiyat.
26. Zarafshan Golden Mining.
27. Local Farmers / herders utilising the Project site.

For the purpose of disclosing information to stakeholders, the following visual aids were used and prepared in three languages: Russian, Uzbek and Kazakh:

- Project Information Leaflet (A5 format).
- Grievance Leaflet (A2 format).
- Project Poster (A0 format).

The Project Information Leaflet included details of the following:

- An introduction to the Project.
- A summary of the environmental and social studies that are being carried out.
- Details of the consultation process.
- Details of what a WTG is and how it functions.
- A summary of construction activities.
- A summary of the activities that are to take place during operations.
- Frequency asked questions about local electrification, local employment opportunities, noise generation, whether animals can graze near to the WTGs, potential impacts from shadow flicker, impacts to people's health and livestock health, and how long the WTGs will be present.
- Details of the grievance mechanism.

To accompany the Project Information Leaflet, a Grievance Mechanism Leaflet was also prepared. This include a summary of how the mechanism operates, a flow-chart indicating the various steps to be taken during the grievance resolution process, and a grievance form that could be completed by a person wishing to raise a complaint.

The large poster prepared included details of the proposed WTG locations, the substation and the overhead lines.

The consultation and disclosure carried out to date will be continued prior to and during construction and operation, with the disclosure of the ESMP and findings of the ESIA, all of which shall be undertaken prior to the start of construction. The consultation process will be led by Masdar's Community Liaison Manager with the outcomes of future consultation communicated through SEP updates.

Table 6-1: Summary of Stakeholder Engagement to Date

Date	Attendees	Location	Key Discussions
29.09.2020	Leaders of Muruntov mahalla	Muruntov mahalla of Zarafshan	<p>Mahalla Muruntov is located inside the Navoi mining industrial zone near the Muruntov quarry, which is active. There are no private houses in the mahalla. All houses belong to the Navoi Mining Company and were built for the employees of the mine and are owned by the Company. In the near future, the mahalla will be moved to the city of Zarafshan due to the expansion of the mining industrial zone.</p> <p>The wind farm Project is supported because of the generation of employment for local people, and due to the expected future increase in electricity that will attract more industrial plants and factories, which will generate even more employment and development.</p>
29.09.2020	Women of Muruntov: entrepreneur, secretary of mahalla	Muruntov mahalla of Zarafshan	<p>Since Muruntov is a village for employees of Navoi Mining Company, many women in the mahallas are wives, mothers, sisters, and daughters of the employees of the Company. There are few job opportunities for women and most spend their time on housework.</p> <p>In terms of weddings, respondents commented that Kazakh men steal their future wives before the wedding, then pay a fee (a bride price or "<i>kalym</i>") and also pay for the wedding. Amongst the Uzbeks, matchmakers are looking for future daughters-in-law and, between families, Uzbeks also have a tradition of paying a price for the bride. All marriages must proceed through a formal state and religious registration. The local religious leader reads the "<i>nikah</i>" and then declares them husband and wife. The inheritance from Kazakhs and Uzbeks is by default transferred to the youngest son, who typically stays at the parental home and takes care of his parents when they are retired.</p> <p>If the Project creates, directly or indirectly, employment opportunities for women, there will be many women willing to work and apply.</p>
29.09.2020	Teachers of school №5	Muruntov mahalla of Zarafshan	<p>There are two schools in Muruntov: Kazakh and Uzbek. Due to the pandemic, many children are out of school this year and are studying remotely. Television channels broadcast the school curriculum daily. However, less than half of the students attend this 'virtual' school.</p>

Date	Attendees	Location	Key Discussions
29.09.2020	Chair of Mahalla Yangi Zarafshan	Khokimiyat of Zarafshan city	<p>Mahalla Yangi Zarafshan is located in the southern and southwestern part of the city. The mahalla until 1994 was a separate village named after Abai (famous Kazakh poet) as part of the Tamdinsky Region. During the expansion of the city, Zarafshan was assimilated with this village.</p> <p>The ethnic composition is 40% Kazakhs, 40% Uzbeks, 10% Karakalpaks, 5% Tajiks, 5% Russians. The population is currently estimated to be 5,146 people. Most people work for the Navoi Mining Company (60%).</p> <p>There are 3 farmers in the mahalla, but they graze their herds on the side of Uchkuduk which is not close to the Project area. There are self-employed citizens who keep small herds of cattle they graze their cattle around the mahalla, and two traditional 'folk healers'. People use the Project Area when they travel to the holy cemetery "<i>Gujumli Avlie</i>". The residents of the mahalla are supportive of the Project as they expect future employment opportunities.</p>

Date	Attendees	Location	Key Discussions
29.09.2020	Chair of mahalla and family department	Khokimiyat of Zarafshan City	<p>The questions on the role and responsibilities of men and women, indicate that all household work is undertaken by a woman, and men take care of their cattle and household plot of land. Many women know how to sew which is a local skill. Women are willing to apply for employment positions generated by the Project. In the city where the participants live, women work in private factories such as PE Agama, Arianna Yarst Textile LLC. About 270 women work in the Agama private enterprise and about 118 women work in Arianna Yarst Textile LLC.</p> <p>Since there are many nationalities in the city, everyone has different customs. After marriage, the girl must move to the groom's house and the woman has an equal voice in the decisions made in the household. There is a significant problem of unemployment for all people, men and women.</p> <p>There are cases of violence against women and during 2020, 15 women were issued a protection order. There is a shelter in the city of MSG "Gornobyvateli", which is financed by Navoi Mining Company and women can stay there for two weeks, free of charge, until the conflict situation has passed.</p> <p>Women inherit land if their spouse is absent, although the land usually belongs to the man.</p> <p>With regards to potential impacts of the Project, no negative impacts were identified. Positive impacts include employment generation and increased electricity for home and business, new jobs from future industrial developments. These benefits should impact both women and men.</p> <p>The participants commented on the way in which the information was shared, which was undertaken with transparency and openness. <i>"It's complete and reliable"</i> they commented and are supportive of the Project. Participants suggested to share information about the Project using social media networks as the entire population will benefit from the Project. The creation of new jobs will improve the living standards and income of women.</p>

Date	Attendees	Location	Key Discussions
29.09.2020	Women of Yangi Zarafshan mahalla: housewives	Yangi Zarafshan mahalla	<p>Women are generally constantly at home, and all household chores are undertaken by women. Men are engaged in shopping for the household. Women know how to sew, and weave carpets. There are no women's organisations on their territory, and there are no shelters for protection, either.</p> <p>After getting married, a girl moves to the groom's house. According to their knowledge there are no local conflicts over land.</p> <p>The Project has no significant negative impacts expected, and positive impacts include increased electricity generation. They support the Project.</p>
29.10.2020	Teacher of school №10, Zarafshan city	Khokimiyat of Zarafshan City	<p>The school has 800 students: 350 boys and 450 girls. There are 120 teachers. The school has 36 classrooms. There are approximately 25-26 students in each class. There is a library in the school.</p> <p>The school has water and electricity. Attendance does not depend on gender. The school has students from an orphanage and there are 150 orphans attending. The literacy rate is 100%. There are middle and high school disabled students and have home-based education. During the last five years living standards have improved.</p> <p>The developer could, in the future, provide support by helping students with disabilities in purchasing computers. In general, they are supportive of the Project.</p>
29.10.2020	Teacher of school № 5	Muruntov village	<p>The school has 60 students, including 20 boys and 40 girls. There are 12 teachers and 8 classrooms. Approximately 6-8 students study in each class and there is a library and electricity.</p> <p>Children attending school live in the village and attendance is 100%. There are no vulnerable students in the area. The information on the Project was useful, and it would be good if the wind farm developer could support the village school with educational equipment.</p>

Date	Attendees	Location	Key Discussions
30.09.2020	Community leaders	Jingildy village	<p>Jingildy is one of the most sparsely populated villages in the Tamdy District. The meeting was held with community leader and 4 women from this location.</p> <p>Respondents mentioned the problem with the availability of water and the unfair distribution of land. There is no source of water in the village itself and this is transported to the village from a well with a depth of more than 100m, located a distance of 2km. Regarding the pasture, when a local farm company "shirkat" ceased operation in 2017, they were promised by the government that an 8-kilometer pasture belt around the village would be planted for the village's cattle and the rest would be given to general farmers. Instead, just 2km of pasture was planted and when they graze their cattle 2km or more, they have conflicts with other farmers over access to pasturelands.</p> <p>The participants mentioned the importance of having strong power transmission wires, because when a strong wind joins together the wires, short circuits are formed and results in the burnout of household appliances.</p> <p>There are 8-10 unemployed men and women in the village who will be happy to apply for employment positions.</p>
30.09.2020	Women of Jingildy village: 3 housewives and a pensioner	Jingildy village	<p>The village is home to only seven families who remained after the reorganisation of the shirkat farm.</p> <p>There are no women's organisations in the area.</p> <p>No negative views towards the Project were raised and the women hope the Project brings employment and other benefits.</p>

Date	Attendees	Location	Key Discussions
30.09.2020	Farmer	Kynyr village	<p>The farm Aldiyarov Kalambay is located close to the village of Kynyr and specialises mainly in camel breeding. Farmer Kalambay is famous for his "shubat" camel milk mare (milk from a female camel). He has 35 camels, 100 sheep, 40 goats and 4 cows, and the family are involved in his pastoralist livelihood. Women are responsible for milk production, and there are 2 water wells in the area he uses for pasture.</p> <p>Livestock and meat are sold quite cheaply, about 4 USD a kilo. Locals or middlemen purchase it, and there is no livestock market in the whole area. His main problem is a lack of water and they need more wells. There is a veterinarian who can provide support and his livestock is vaccinated against anthrax. A further challenge is the loss of newborn lambs (about 20 a year) that are killed by foxes and wild cats when they lag behind the herd. They do not hunt and the collection of wild herbs is very rare. Herbs collected by women: comprise Isirik (<i>peganum harmala</i>) for medicinal purposes including pain relief, Artemisia (<i>Artemisia terra alba</i>) for cough, stomach and intestinal upset, and <i>Alhagi pseudoalhagi</i> for cattle.</p>
30.09.2020	Meeting with women	Kynyr village, community leader's place	<p>There are only six families in the village. There is no shop, no school, there is a medical room but very often it is not functioning, and they travel to Tamdy District to buy food.</p> <p>The family of Tulegenova Gulzira was visited. Her husband owns a farm with 60 heads of camels and she is a housewife and knows how to sew. She stated that all household chores are performed by woman. Agricultural crops are not grown, and the man decides on the grooming and breeding livestock. The host invited another woman and her family members work in the farm.</p>
30.09.2020	Tamdybulak village Mahalla leader, 2 village leaders, pensioners	Mahalla of Tamdybulak village	<p>Tamdybulak (Old Tamdy) is an old regional centre of Tamdy District. The decision to move the regional centre was made in 1993-1996, but the khokimiyat itself was moved in 2008. Old Tamdy is located in a seismically active area and near the village there is a tectonic fault, as well as bentonite rocks under the soil of the village, which increases the risk of earthquakes. Therefore in 1996 the village was recommended to be relocated.</p> <p>The stakeholders present at this meeting stated that there are 8 farmers who have registered their land within the Project Area of the wind farm and many of them are based in Tamdy are not local. <i>NOTE: the numbers of farmers who have land leases in the Project area was later clarified with Zarafshan District in March 2021 where it was found that the actual number is 10.</i></p>

Date	Attendees	Location	Key Discussions
01.10.2020	Women of the Tamdybulak and Kazbekbi villages	Mahalla of Tamdybulak village	The village has 2 schools, 3 shops, feldsher obstetric station (a primary healthcare centre that provides basic access to medical services and treatments). Medical personnel at such stations typically refer patients (where necessary to the larger hospitals). They said that women are mostly engaged in housework and raising children, and there is no violence against women. There 4 vulnerable families in the area, that live in poverty, and community members support them. The perceptions towards the Project were favourable as it is expected to bring employment opportunities and electricity.
01.10.2020	Teachers of schools № 4	Mahalla of Tamdybulak village	The school has 55 students, including 20 boys and 25 girls. There are 12 teachers and 8 classrooms. Approximately 6-8 students study in each class. There is a library, electricity and the school does not provide meals. Children attending the school live in the village. Within the last five years the socio-economic situation has improved. However, within some families both parents do not work and they tend to pay less attention to their children's education. The Project is expected to be beneficial for all residents and children in the school will learn about renewable energy.
01.10.2020	Community leaders	Ajiriqti village mahalla	The Ajiriqti village is located between the Old and New Tamdy settlements and, together with the Kynyr village, belong to the Aktau village gathering of citizens. There are 810 inhabitants in the village and people have lived on the territory for a long time; nomadic herders lived here previously close to a water well. In 1950-60, a collective farm named after Balimanov was established. In the village, drinking water and electricity are supplied constantly. There is a school and kindergarten. The employment level is 40% with another 40% of the population self-employed in cattle breeding. Many houses keep sheep, goats, cows and horses. From the former collective farm of Balimanov, 4 farmers have territories on the Project area: (Mirzatai Bekatai farm, Abdubakhtzhan LLC, Madina Sinbad farm, Aisultan Danabek farm).
01.10.2020	Teachers of school № 21	Ajiriqti village mahalla	The school has 240 students, of which 130 are boys and 110 are girls. There are 22 teachers and 8 classrooms, with approximately 24-26 students in each class. There is a library and equal numbers of male/female students attend the school. Parents support their children and help them with their studies. The school request support from the wind farm developers to build a football stadium in the school. After the information on the Project was shared, the participants indicated that they support the Project.

Date	Attendees	Location	Key Discussions
01.10.2020	Farmer, "Aysultan Danabek"	Ajiriqti	<p>Aisultan Danabek farm is located on the eastern and south-eastern part of Aktau Mountain and was established in 2019 through a land lease agreement for 49 years. They have 300 sheep, 30 horses, 16 cows and 10 goats. On the territory there is one well with brackish water and it is collected in a pool of 500 litres. The farmer himself works as a shepherd in the farm and his son, a student, helps him.</p> <p>There are no livestock markets in Tamdy District and dealers from Gijduvan work in this area. There are veterinarians in the area. Community members don't hunt and collect wild plants, and sometimes hunters from outside arrive into the Project Area.</p>
01.10.2020	Meeting with women, Ajiriqti village: Pensioner librarian	Mahalla premises, Ajiriqti	<p>Women in the area are either housewife or employed in public services. Men graze livestock and would be happy to apply for a job within the Project.</p>
01.10.2020	Chair of Mahalla, deputy khokim on women and family issues	Yangi Tamdy	<p>Yangi Tamdy village is the regional centre of Tamdy District and all administrative buildings and institutions of the district are located here. The village is connected with a regional gas network, and the supply of electricity and drinking water is also stable. The current population is estimated to be 692 and is increasing due to the availability of employment in government departments.</p> <p>The ethnic composition is dominated by 85% Kazakhs. Of the farmers registered in Yangi Tamdy, at least 8 have land in the Project area. When shirkat farms began to close in 2017, the khokimiyat announced auctions for land and farmers from other regions received land under the Aktau mountain.</p> <p>The participants warmly support the Project, as this is expected to generate electricity which will then lead onto more factories and jobs for people. There will also be employment opportunities from the wind farm as well.</p>

Date	Attendees	Location	Key Discussions
01.10.2020	Teacher of school № 25, Public education Specialist	Yangi Tamdy	<p>The school has 125 students, 67 boys and 58 girls, 20 teachers and there are 21 students in each class. There is running water and electricity available in the school. All students live in the school district. There is no gender inequality in school attendance, everyone has equal attendance. Parents support the education of their children.</p> <p>The teacher raised a concern associated with the poor quality of teaching equipment. Within the last 5 years, conditions have improved through renovation of the school, additional classrooms, and the number of new textbooks increased. There are several disabled students in the school, and they receive support from the government.</p> <p>They believe the Project will benefit everyone in the villages and region through the generation of employment.</p>
02.10.2020	Teachers of Schools № 18	Rokhat village, school №18	<p>There are 144 boys, 56 girls, 21 teachers and each class have their own classroom. There are 21 students in each class, a library, running water, electricity, and the school does not provide food. All students live in the school district. There is no gender inequality in school attendance. A new school is under construction which will be commissioned in November 2020. There are several vulnerable families in the district that receive community support.</p> <p>The teachers supported the Project and wanted the children to learn about renewable energy.</p>

Date	Attendees	Location	Key Discussions
02.10.2020	Village leaders: Doctor, pensioners	Rokhat village, school №18	<p>Rokhat village is located 6km south of the city of Zarafshan. The current estimated population is 1,050. The settlement was created in 1971 around the farm of the Tamdy state farm. In the village there is a school, medical station. The electricity supply is reliable and non-potable water which is abstracted from the Amu Darya river. An estimated total of 440 people are officially employed, of which 180 are employed at the Navoi Mining Company. There are also 8 farmers locally active.</p> <p>The ethnic composition of the population is 75% Kazakhs, 20% Uzbeks and 5% Karakalpaks. Among socially vulnerable people, the respondents mentioned that 13 are disabled, 22 are families living in poverty, and there are also some lonely old men.</p> <p>Rokhat is far from the Project Area and they are not against the construction of a wind farm. Conflicts on land and pasture in Rokhat do happen, mainly between local private herders, and farmers who have long-term leases on land. The private herders encroach on the leased land without permission.</p> <p>The main challenge of residents is a shortage of natural gas and drinking water. The nearest source of drinking water is 5km in the city of Zarafshan.</p> <p>The views on the Project were mixed, as they were not familiar with this type of activity. If the Project generates employment, then they are favourable towards the Project.</p>
02.10.2020	Community members of Alisher Navoi	Zarafshan, Mahalla premises	<p>Mahalla Alisher Navoi is the largest mahalla of the city with a current estimated population of 7,728 people and 1,722 families. The population of the mahalla is increasing as many people from other districts of provinces and districts come to the city in search of work. The mahalla has a kindergarten, a school, a clinic, and a bazaar. The industrial zone of the city also belongs to the territory of the mahalla. There are 4,767 officially employed in the mahalla, out of them at least 2,500 people work in the Navoi Mining Company.</p> <p>The ethnic composition of the mahalla is as follows: 3,870 Uzbeks, 1,311 Russians, 1,235 Kazakhs, 1,257 Kirghiz, 20 Tajiks, 35 others. Mahalla residents do not visit the Project area, and if the Project generates employment then many people will be willing to apply.</p> <p>Alisher Navoi mahalla is one of the richest mahallas in the city of Zarafshan. There are no communal problems, and it is their mahalla that has a prestigious gymnasium school in Zarafshan. The average salary of residents of the mahalla is higher than that of similar residents of Tashkent. They support the idea of the Project, expecting employment and electricity. The Project may benefit men rather than women from employment.</p>

Date	Attendees	Location	Key Discussions
02.10.2020	Director of Youth Centre NGO "Timaris"	Kanimekh district, Navoi	<p>The goal of our organisation is to assist in increasing the role and activity of disabled people, women and youth in the Navoi region, by involving them in social, economic and cultural life of the region. The NGO cooperates with the following institutions:</p> <ul style="list-style-type: none"> • Administrator of Navoi region; • Union of Youth of Navoi region; • Council for the coordination of the activities of self-government bodies of citizens of the Navoi region; and • Editorial office of the "Banner of Friendship" newspaper. <p>The organisation was created in 2018 and started 2 projects to educate unemployed women and girls on their legal rights in the territories of Uchkuduk, Zarafshan, Tamdy, Kanimekh and Zafarabad.</p> <p>Navoi region is the largest in terms of territory in the Republic of Uzbekistan, the second after Karakalpakstan. There is a problem with the provision of public transport due to the large distances between settlements in the region.</p>
02.10.2020	NGO "society of disabled people"	Kanimekh, Navoi region	<p>The goal of our organisation is to increase the role, opportunities and protect the rights of disabled people, women and youth in the Navoi region. The organisation was created in 2013 and registered under No.122 by the Department of Justice of the Administrator of the Navoi region.</p> <p>The NGO's partners are:</p> <ul style="list-style-type: none"> • Administrator of Kanimekh District, • Council for the coordination of the activities of self-government bodies of citizens of the Navoi region; • Office for support of family and mahalla; and • Department of employment of the Kanimekh District. <p>The Project is expected to benefit the local population and businesses, both at home (for women) and for men through employment. The Project should offer employment places for disabled people, as well as raise the level of education and social support to the disabled community of the region.</p>

13.11.2020	Representatives of Zarafshan City Administrator, Zarafshan Golden Mining Company	On-line session via ZOOM	<p>Zarafshan city is a relatively young city being established in 1965. The population is 82,000, of which 46,000 are economically active. There are 4 banks, 13 mahallas, 2 markets in the city, plus 12 schools, 13 kindergartens one in each mahalla. 30,000 city inhabitants are young people aged 18-30 years. Major sectors are industry and services. The agriculture sector is barely present. The average monthly wage is 4,700 UZS (470 USD).</p> <p>The main part of the population (25 000) is employed in Zarafshan Golden Mining Complex. There are no conflicts observed in the city, and the streets are equipped with cameras resulting in a low crime rate. There are 323 residential buildings and of these 50 are relatively new.</p> <p>The work in the mine is carried out in shifts, all year around. The main road is used for the transportation of workers to the plant. The mining ore is transported by railroad and not by the public road network.</p> <p>The resort area "Golden Keys" belongs to the mining complex. Employees of the mine can book and spend weekends or vacations in the resort which is mostly occupied in summer.</p> <p>Information about future employment vacancies can be communicated via the Cities' official website, local newspaper, and local labour office. Social media is very popular (telegram) and can also be used.</p> <p>The city representatives fully support the Project and there is the potential for the Project to attract tourists, as this is the first wind farm in the country. The representatives stated that they believe men will benefit more than women, as men have higher levels of education in areas such as energy and construction. Overall, this type of Project is crucial for the region and may attract further investment in the future as all projects need energy.</p>
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Date	Attendees	Location	Key Discussions
30.11.2020	Representative of Tamdy District Khokimiyat	On-line session via ZOOM	<p>Deputy Khokim informed that the Project land is categorised as pastureland. On 02 September 2020, this land was transferred to the newly established Committee for the Development of Silk and Pots (No. 6059 dated 02.09.2020).</p> <p>All land users have now signed their contracts with the Committee. The representative did not have any information associated with the terms of lease agreements although the number of farmers with lease agreements in the Project Area could be up to 10.</p> <p>There are no settlements or houses in the area, other than informal shelters used by herders. Usually there are 2-3 herders who stay and work in shifts. The herders are young and middle age local people. There may be around 10 shelters in the area and their exact locations are not known as the shelters are not included in official maps and are not considered legal buildings. Usually farmers build a shelter next to the well, water course. The shelters are occupied all year around.</p> <p>In relation to future engagement on land-related matters, this should take place between the Project Developer and the Tamdy District, through the Committee for the Development of Silk and Pots.</p> <p>Deputy Khokim stated that any legal entity needing land should be registered in Tamdy District, as the taxes paid in the district will then return to the people of the area through pensions and social payments, etc.</p> <p>Overall, the stakeholder supports the Project.</p>
April 2021	Farmers / herders utilising the Project site.	At farms on the Project site.	<p>The two farmers interviewed live in Zarafshan City and have leased the land since 2017. They do not sub-let and have a number of shelters on the farmland utilised throughout the year.</p> <p>The herders active in the Project area are from smaller villages across the region. They receive a cash payment for their time.</p>
11.05.2021	Formal public hearing for OVOS process.	Public hearing at Khokimiyat of Tomdi district.	<p>A Project presentation and movie was shown to community members. The project was very positively received however all community members would like the Project renamed to Zarafshan-Tomdi Wind Power Project (WPP) or Tomdi WPP given that all the land allocated for the Project is fully within the Tomdi district.</p>

6.1 Key Outcomes of ESIA Consultations

A review of stakeholders' opinions towards the Project collated during the ESIA reflect the following:

- A clear expectation of local employment opportunities and improved electricity supply, which is expected to result in follow-on industrial developments, bringing even more employment and improved economic opportunities in the future.
- The expectation for Project employment opportunities to benefit men more than women.
- Community investment projects that are funded by the developer to address challenges such as inadequate teaching materials, water supply problems, and the living standards and future opportunities for young and disabled people.
- The opportunity for young people to learn about this type of renewable energy which is new to both the region, and country as a whole.

During the stakeholder engagement activities, there were no specific concerns reported associated with the Project. The potential for the Project to interact with people collecting wild herbs, using land for the grazing of livestock, accessing the holy cemetery "*Gujumli Avlie*" and equal access to women for employment opportunities that were mentioned in the stakeholder engagement meetings, will be addressed in the impact assessment.

7 Future Stakeholder Engagement

Details of the proposed future stakeholder engagement programme are presented in the following sub-sections and is summarised in Table 7-1 at the end of this section.

7.1 On-going Consultation

Future consultation events will be held to ensure Project information is continued to be disseminated to the community. Due to continued COVID-19 restrictions, consultation in 2021 will also be carried out in accordance with Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19 (May 2020)³ and in country Government advice.

Consultations for 2021 are likely to be undertaken as a mix of in person / remote / online discussions as COVID-19 restrictions allow. This approach may continue into 2022.

Following the social mapping study which was carried out in March 2021 to identify farmers / herders who utilise the Project site area, further regular consultation will be undertaken with regarding potential impacts to their livelihoods as the Project progresses. A Livelihood Restoration Plan (LRP) will be developed to ensure that people utilising the land at present are adequately compensated for any loss and an opportunity is provided for them to re-establish livelihoods. No physical displacement will take place as a result of the Project.

7.2 Disclosure of the ESIA

The full ESIA disclosure pack including the Stakeholder Engagement Plan, Non-Technical Summary (NTS), full ESIA documentation, Environmental and Social Management Plan (ESMP) and Environmental and Social Action Plan (ESAP) will be made available to the public through the internet and information boards/announcement in respective communities' buildings. It is envisaged that the disclosure material will be in Russian, Uzbek, Kazakh and English language.

Following approval of funding for the Project, an announcement of the full decision to develop the Project site will be confirmed to stakeholders through press announcements, the internet (company website), local newspapers and information boards/announcement in respective communities' buildings.

³ https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_tipsheet_covid-19_stakeholderengagement

Further updates to the Project after the initial Disclosure exercise will be communicated with the community by way of community meetings.

7.3 Other Engagement Activities

Stakeholders will be engaged throughout the implementation process for consultation, information dissemination and grievance management. There will be the ongoing sharing of Project information with community leaders in order for stakeholders to be informed about construction activities and progress, to minimize grievances, and to manage expectations.

7.4 Methods of Communication

The methods of communication to be utilised by Masdar will be in accordance with Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19 (May 2020)⁴ and in country Government advice, and may include:

- Publication for public review of the ESIA, SEP, NTS, ESMP and ESAP.
- Meetings with regulatory bodies.
- Public meetings.
- Published updates on local council website.
- Announcements in local media.
- Provision of general information on notice-boards at key public locations.
- Publication of Project information including ESIA, a NTS, ESMP, ESAP and additional information on the Masdar website.
- Disclosure of monitoring reports.

7.5 Stakeholder Engagement Programme

The Project stakeholder engagement programme is presented below. This will be reviewed and updated as the Project progresses.

⁴ https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_tipsheet_covid-19_stakeholderengagement

Table 7-1: Stakeholder Engagement Programme

Activity/Project	Project Timescales	Issues to be Discussed and Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
Provision of Project information	Prior to Construction. During Construction on an ongoing basis	Information board to be installed at: <ul style="list-style-type: none"> • Project site entrance. Boards to provide information on: company name, grievance mechanism, key activities and schedule, mitigation measures associated with the management of workers behaviour in accordance with the Accommodation Management Plan, Worker Code of Conduct, land access restrictions during construction and content of the Community Health Safety Management Plan, operational capacity of the wind farm once installed, future annual environmental and social performance reporting.	Information boards (in Russian, Uzbek and Kazakh).	<ul style="list-style-type: none"> • Information is publicly available to all stakeholder groups
Public Consultation Meetings	Prior to Construction. During Construction every month	<ul style="list-style-type: none"> • Update on Project progress (schedule and key activities) • Key environmental and social management measures. • Land access restrictions. • Local workforce accommodation arrangements. 	Posters indicating key management measures and grievance mechanism (in Russian, Uzbek and Kazakh).	<ul style="list-style-type: none"> • All stakeholder groups are invited to attend, including , community/village council representatives, local community groups and charitable organizations

Activity/Project	Project Timescales	Issues to be Discussed and Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
		<ul style="list-style-type: none"> Grievance mechanism. Prohibition of open fires within the Project area. Cultural awareness of the incoming workforce. 		
Meetings with Farmers and land owners / land users (every two months)	During Construction every two months	<ul style="list-style-type: none"> Update on Project progress (schedule and key activities including road transport concerns, worker off-site accommodation and their behaviour, plus other key topics) Details of construction work. Any land access restrictions. Grievance mechanism. 	Posters including Project land access restrictions (in Russian, Uzbek and Kazakh).	<ul style="list-style-type: none"> Landowners / users. Local farming community representatives.
Bi-monthly Environment and Social Committee Meetings.	During Construction every two months	<ul style="list-style-type: none"> Update on Project progress (schedule and key activities including road transport concerns, worker off-site accommodation and their behaviour, plus other key topics) Ongoing management of key environmental and social issues. Perceptions towards the Project. Review of grievances recorded since the last meeting and status of all outstanding concerns. Any other business. 	Public meeting.	<ul style="list-style-type: none"> Regional government representatives Community/village council representatives.

Activity/Project	Project Timescales	Issues to be Discussed and Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
Annual Environmental and Social Reporting	During Construction annually	A summary of the yearly environmental and social performance of the Project to cover the following topic areas (plus others): local employment, local procurement, ecology surveys, waste management, training, workforce management measures, water consumption, road traffic movements and management measures.	Annual Environmental and Social Performance Report (in Russian, Uzbek, Kazakh and English).	<ul style="list-style-type: none"> Publicly available to all stakeholder groups
Annual Public Consultation Meetings	During Operations	<ul style="list-style-type: none"> Update on Project energy generation Key environmental and social management measures in place during operations. Grievance mechanism. Key findings from environmental surveys undertaken. 	Public meeting. Posters indicating key management measures and grievance mechanism (in Russian, Uzbek, Kazakh and English).	<ul style="list-style-type: none"> All stakeholder groups are invited to attend, including village council representatives, local community groups and charitable organizations
Annual Environmental and Social Reporting	During Operation annually	A summary of the yearly environmental and social performance of the Project to cover the following topic areas (plus others): power generated, local employment and procurement, and the key findings of environmental surveys undertaken.	Annual Environmental and Social Performance Report (in Russian, Uzbek, Kazakh and English).	<ul style="list-style-type: none"> Publicly available to all stakeholder groups

8 Monitoring and Reporting

Through communication channels such as the presentation of announcements at local community buildings, media and periodic meetings as listed above, Masdar will monitor and provide feedback as appropriate.

For public consultation meetings or public exhibitions, Masdar will use an open book (with pens provided) for recording questions and comments anonymously. A form will be provided for people to record complaints and grievances. These will be present in an obvious area of the exhibition however the area will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by Masdar so that a response and feedback can be made to stakeholders.

The results of public consultation and Project information disclosure (together with the grievance procedure) will be reported throughout the construction period as part of Masdar's environmental and social monitoring and reporting requirements. The reports must include attendance, purpose of meeting, and comments and decisions made.

8.1 Review of the SEP during the Construction Phase

Stakeholder engagement during the construction phase will relate to all activities leading up to and during the physical construction of the Project infrastructure, as well as the management of contractors and construction contracts. Engagement with stakeholders during construction is primarily about involving stakeholders in assessing whether previously identified mitigation measures are working as intended, being responsive to grievances and identifying alternatives where there are failings.

Table 8-1 describes the monitoring KPIs that shall be used during the construction phase.

Table 8-1: Pre-Construction Phase Monitoring KPIs

Topic Area	Monitoring KPIs
Provision of Project information	Number of working days the Project office is available and open, per month.
Monthly Public Consultation Meetings	Number of monthly public consultation meetings held as planned, per year. Number of people attending each monthly public consultation meeting, broken down by gender. Number of actions for Masdar recorded at each monthly meeting.

Topic Area	Monitoring KPIs
	Number of actions for Masdar addressed that were raised at previous monthly meetings.
Bi-monthly Meetings with Farmers and land owners / land users (every two months)	<p>Number of bi-monthly meetings with farmers and land owners/users held as planned, per year.</p> <p>Number of people attending each, broken down by gender.</p>
Environment and Social Committee Meetings.	<p>Number of annual meetings held, per year (target is 1/year)</p> <p>Number of people attending each meeting.</p>
Annual Environmental and Social Reporting	<p>Release of an annual environmental and social report to stakeholders (target is 1/year)</p> <p>Number of comments/responses following issuance of the annual environmental and social report.</p> <p>Number of subsequent responses to comments on the annual report.</p>
Grievance mechanism	<p>Number of grievances raised per month.</p> <p>Number of grievances outstanding at the end of each month.</p> <p>Number of grievances where a written acknowledgment was provided within five working days.</p> <p>Number of grievances resolved within the 15 working day target.</p>

9 Grievance Mechanism

9.1 Overview

Wood, on behalf of Masdar, has developed a community grievance mechanism for the Project in accordance with the ADB Safeguard Policy Statement, IFC's PSs and Guidance Notes and EBRD PRs 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 IFC PSs and Guidance Notes and EBRD PRs emphasize that a grievance mechanism should help Masdar 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 Masdar'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. The flowchart shown in Figure 9-1 below illustrates a general mechanism of processing the complaints.

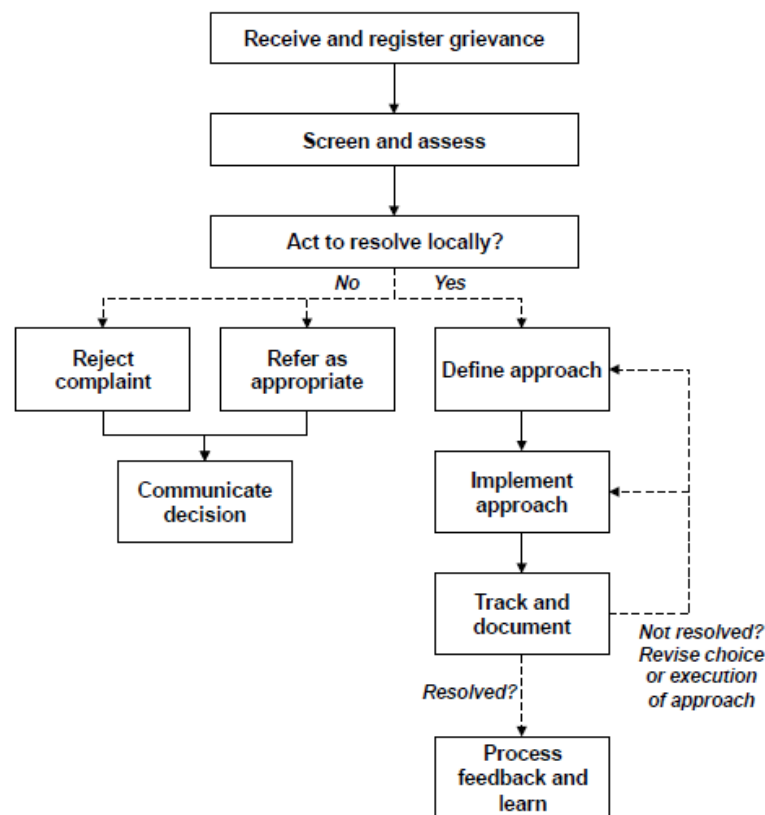


Figure 9-1: Grievance Mechanism Flowchart

9.2 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 9-1: Examples of Grievances

Type of Grievance	Complainant(s)	Example
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.
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.
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.
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.
Major claims that company activities have resulted in significant adverse impacts on larger populations of people.	Community groups, non-governmental 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. Off-site worker conduct adversely impacting on a local community safety and security.
Major claims over policy or procedural issues.	Non-governmental organizations, community groups or community-based organizations, or local governments.	A company's non-compliance 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.

9.3 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.
- An apology.
- Compensation.
- Modification of the conduct that caused the grievance.
- Some other fair remedy.

In voicing their concerns, they also expect to be heard and taken seriously. Finally, Masdar, contractors, or government officials must convince people that they can voice grievances and work to resolve them without retaliation.

9.4 Masdar Grievance Resolution Mechanism

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. Masdar has developed and implemented 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 helps 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.

At all times, Masdar will accept comments and complaints concerning the Project in both verbal and written formats. A template Grievance Form is provided in Appendix B.

The key aspects of Masdar grievance mechanism are described below:

9.4.1 Responsibilities

Any person or organisation may send comments and/or complaints in person or via post, email, or facsimile using the following contact information. The Masdar General Manager or the Environmental and Social Engineer will be appointed to oversee the implementation of the grievance mechanism, with support from the Community Liaison Officer (CLO).

Table 9-2: Responsible Persons and Contact Details

Masdar	EPC Contractor
To be confirmed.	To be confirmed.
CLO 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.

9.4.2 On Receiving a Grievance

The comments and complaints will be summarised and listed in a Complaints/Comments Logbook, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant. Following a grievance being recorded, Masdar will acknowledge the grievance, in writing, within a period of up to five working days and state that this is now being investigated in accordance with the grievance mechanism.

9.4.3 Assessing the Grievance

During the assessment, the team shall gather information about the case and key issues and concerns and helps determine whether and how the complaint might be resolved.

Masdar will:

- Determine who will conduct the assessment. Typically, the complaints coordinator performs this task or directs it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a company member 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 (high, medium, or low). 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.

9.4.4 Formulation a Response

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 site manager may participate in feedback, depending upon the seriousness of the complaint.

When formulating a response, Masdar 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.

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.

Masdar will respond to the complaint within a period of up to fifteen working days with a proposed resolution to the grievance. If the proposed resolution cannot be sent to the complainant within this time for any reason, then Masdar will inform the complainant about the reason for the delay and indicate a target date as to when a proposed resolution will be submitted to them.

9.4.5 Track and Monitor Grievances

Grievances need to be tracked and monitored as they proceed through the system. Effective tracking and documentation accomplish several goals:

- Document the severity of a complaint (high, medium, low) according to specific criteria. The level of severity guides requirements for alerting senior management and determines the seniority of management oversight needed.
- Provide assurance that a specific person is responsible for overseeing each grievance—from receipt and registration to implementation.
- Promote timely resolution according to the time periods specified in the SEP.

- Inform all concerned (the complainant and appropriate company personnel) about the status of the case and progress being made toward resolution.
- Document the company's response and outcome(s) to promote fairness and consistency.
- Record stakeholders' response(s) and whether additional research or consultation is needed.
- Provide a record of settlements and helps develop standards and criteria for use in the resolution of comparable issues in the future.
- Monitor the implementation of any settlement to ensure that it is timely and comprehensive.
- Provide data needed for quality control measures, to assess the effectiveness of the process and action(s) to resolve complaints.
- Identify learning from specific cases to be used later to assess the effectiveness of the mechanism or address systemic issues that may require changes in company policies or performance.

In order to ensure that grievances are tracked and documented, Masdar has provided for the following:

- Tracking forms and procedures for gathering information from company personnel and complainant(s).
- Dedicated staff to routinely update the database of grievances.
- Periodically review information so as to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled by the company, and periodically evaluate the overall functioning of the mechanism.
- Processes for informing stakeholders about the status of a case (such as written status reports).
- Procedures for provision of regular reporting of grievances and resolutions.

9.4.6 Grievances Received to Date

Grievances received to date are summarised in Table 9-3.

Table 9-3: Grievances Received to Date

Date	Grievance	Raised By	Action Taken

Date	Grievance	Raised By	Action Taken

Appendix A Example Grievance Form

GRIEVANCE LOG FORM			
SECTION 1: COMPLAINANT DETAILS			
Complaint Reference Number	Date Received	Recipient of Complaint	Manner in which Complaint was Identified / Submitted by Complainant
Request to remain Anonymous?	Yes	No	
Name of Complainant / Organisation Registering Complaint (if not anonymous)			
Preferred language of communication			
Contact Details	Telephone Number	Physical and/or Postal Address	
SECTION 2: DETAILS OF COMPLAINT			
Time and Date Complaint Refers to (i.e. when did the event happen)			
Description of Complaint and / or Evidence of the Issue			

GRIEVANCE LOG FORM**SECTION 3: GRIEVANCE TYPE/CATEGORY**

Provide the grievance type to this grievance

Relatively minor

Significant

Major

Provide a brief reason for the assignment of the grievance type:

SECTION 4: ACTION TAKEN / REQUIRED

Acknowledgement of Complaint Sent to Complainant? (Y / N)

Date Acknowledgment Provided

When

Date Set for Resolution of Complaint

Description of Subsequent Action Taken (divide into Immediate Action and Subsequent Investigation, if applicable)

GRIEVANCE LOG FORM		
Action Carried Out By Whom	Date of Completion	Method of feedback to Complainant
Stakeholder Response to Action		
SECTION 5: EFFECTIVENESS REVIEW		
How was the Action Verified to be Effective at Resolving the Complaint?		
Approved By		Date

