

Rykove (Porogy 2) Solar Project Stakeholder Engagement Plan (SEP)

26 July 2018

1 Introduction

1.1 Background

The project developer *Grin Agro Servis* has approached the European Bank for Reconstruction and Development (EBRD) for financing the construction of Rykove solar photovoltaic power plant (the Project) in Kherson Oblast of Ukraine. The project is thus subject to the EBRD's 2014 Environmental and Social Policy, and has been determined as a Category B project. EBRD's consultants have conducted an environmental and social due diligence assessment of the project and supported the development of applicable environmental and social documentation, namely, an Environmental and Social Action Plan, a Non-Technical Summary of the environmental and social considerations, and a Stakeholder Engagement Plan.

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

1.2 The Project

The project will put in 35,316 photovoltaic modules and associated equipment, which will provide an installed capacity of 11.5MW p/ 9 MW_{AC}, and approximately 14.3 GWh (gigawatt-hours) of net electricity generated per year.

The plant will be operated on an area of 16 hectares that is leased for the project. The plant will be connected to the distribution grid via a 1.9km long 10kV underground cable attached to an existing substation "*Partyzany*" owned by *Ukrzaliznytsa* (State Railways). Electricity will be sold to the national grid at the "green tariff".

The Project will be located near Rykove (former name *Partyzany*) urban-type settlement (3,514 residents) in Genicheskiy district of Kherson Oblast. The nearest residential properties of Rykove are located at 40m from the Project site. The location of the project is shown on the *Figures 1* and *2* below.

¹ EBRD Performance Requirement PR10

Figure 1 General map view



Figure 2 Close-in satellite image



The plant will be constructed and operated by *Block Master Ukraine* (general contractor, and operation and maintenance contractor) under the general supervision of *Grin Agro Servis (GAS LLC)*. These are Ukrainian companies that have been engaged in the development, construction and operation of the solar photovoltaic power plants across the country for several years.

It is planned to start the construction in August 2018, and complete it within 16 weeks. The commercial operation of the project (start of electricity sales to the grid) is expected to begin in March 2019.

By employing the renewable solar power, the project will provide significant environmental benefits over other types of energy generation, such as those using fossils fuels (gas, coal) or nuclear. It will contribute to the reduction of emissions of greenhouse gases, create some temporary construction jobs, and improve the security of energy supply in the area.

1.3 Requirements for Stakeholder Engagement and Public Consultation

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

As per EBRD's Environmental and Social Policy of 2014, the project funded by the Bank must meet the best international practices and requirements for stakeholder engagement and public consultations. The principles, requirements, methodological and procedural aspects of stakeholder engagement for EBRD projects are described in detail in Performance Requirement (PR) 10 "Information Disclosure and Stakeholder Engagement"³. This requirement outlines a systematic approach to stakeholder engagement that will help clients build and maintain over time a constructive relationship with their stakeholders, including the locally affected communities.

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

³ EBRD Environmental and Social Policy 2014 (<http://www.ebrd.com/what-we-do/strategies-and-policies/approval-of-new-governance-policies.html>)

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

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

1.4 Previous Stakeholder Engagement Carried out by the Developer

The developer (via its subsidiary company Rengy Tatarbunary LLC which holds a long term landlease agreement for the project site) has informed the general public about the planned project and participated in public consultation meetings, as follows:

- The local community was informed about the project via publications in local newspaper, as well as on notice boards in public places (a copy of an information notice in a newspaper is attached in *Annex A*).
- A public consultation meeting on the General Development Plan for Rykove, including zoning of the territory for siting this PV project, was carried out in Rykove on 12 Dec 2017. The meeting was attended by 25 participants, including representatives of local government, NGOs and residents.
- The developer also held a public consultation meeting in Rykove on 29 May 2018, as presentation of the project. An extract from the minutes of this meeting is attached in *Annex B*.
- During the site visit on 10 Apr 2018, the consultant met with the Head of Rykove to discuss the project implementation issues and any concerns thereof. The Head personally was amicable to the project, and mentioned that local people generally support it as well.

Also, *Grin Agro Servis* announced and discussed the project at several meetings with local and regional authorities, who also informed the press about these construction plans. The company interacts with statutory stakeholders, such as regulatory authorities, on an ongoing basis. Finally, the project approval process involved permit applications to various regulatory agencies, which have also been successfully completed.

1.5 SEP Objectives

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

2 Stakeholder Identification and Assessment

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

- Internal stakeholders, such as *Grin Agro Servis*'s employees and construction contractors' workers;
- Local residents and land owners/users in the project vicinity;
- Government administrations and regulatory authorities of various levels;
- Local media and internet sites with coverage of local and regional affairs;
- Non-governmental organisations (NGOs), scientific research community.

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

Table 2.1 Project Stakeholders

No	Name of Stakeholder	Description	Contact Person	Contact Details
Internal				
1	Employees	Grin Agro Servis employees involved in, or affected by the Project	Komorny S.V., Director Kisilyov A., Technical director	Address: Ukraine, Kiev, 72A Velyka Vasylkivska St., 8th floor Phone: +38 044 585 9150 E-mail: info@rengydevelopment.com.ua
2	LLC «Block Master Ukraine»	General contractor of the project	Tymoshchenko V. Director	Address: I.Franka Street, 20, Starokonstantyniv, 31104, Khmelnytsky region, Ukraine Phone: + +38 (044) 592-74-82 E-mail: info@blockmaster.com.ua
Local residents				
3	Residents of the Rykove City	Local residents		
Government and regulatory				
4	Rykove City Council	Local government	Galicki A.A. Head of the village council	Address: 28, Centralna Str, Rykove , Henichesk district, Kherson Oblast Phone: +380 4344 2 13 69
5	Genichesk District Administration	District government	Evstratov A.A., Head of the regional administration	Address: 5, Centralna str., Henichesk, Kherson Oblast, Phone:+38 (05534) 3 25 25
6	Khersonska Oblast Administration	Regional government	Ghordeev AA. Head of Regional Administration	Address: Kherson city, 1, Svobody str., Phone: +38 (0552) 42-40-50
7	State Architectural Construction Inspectorate	Regulatory authority	Petrov D.S. Head of department	Address: Kherson city 69, Kremenchukska str. Phone: +38 (0552) 26-37-95
8	Department of Culture, Tourism and Resorts Khersonska Oblast Administration	Regulatory authority	Duminska S.V. Head of Department	Address: Kherson city 16, Ushakova Avenue Phone: +38 (0552) 22-45-57

9	Department of Ecology and Natural Resources	Regulatory authority	Poputko Y.A. Head of Department	Address: Kherson city 10, Kozackii lane. Phone: +380 552 26-31-95
Other				
10	"KhersonOblenergo"	Regional electricity company	Goncharov V.D. Technical Director	Address: Kherson city 5, Pestelya Phone: +38 (0552) 48-
11	Neighboring property owners and land users	Property owners and users		

3 Disclosure of Information and Stakeholder Engagement Programme

3.1 Disclosure of Information Relevant to Project

To meet the environmental and social requirements and performance standards of EBRD, the Non-Technical Summary of environmental and social considerations (NTS) and the SEP (this document) are being disclosed to the public on USELF web site www.uself.com.ua and developer's web site rengydevelopment.com.

Printed copies of the NTS and SEP will also be made available to the public at Rykove Town Council, Genichesk District Administration, and from *Grin Agro Servis* offices upon request.

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

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

3.2 Stakeholder Engagement Programme

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

Table 3.1 Provisional Stakeholder Engagement Programme

No	Stakeholder	Activity	Means of Communication	Timeframe
Project Preparation (Pre-construction) Phase				
1	All stakeholders	<ul style="list-style-type: none"> Publish NTS and SEP (in English and Ukrainian), and inform all stakeholders through local media 	<ul style="list-style-type: none"> Local media publications; Publications on web site. 	2018
2	Statutory stakeholders (regulatory agencies)	<ul style="list-style-type: none"> Obtain all necessary permits for project construction 	<ul style="list-style-type: none"> Official correspondence; Meetings. 	2018
3	Construction contractors, temporary	<ul style="list-style-type: none"> Agree construction related grievance management procedure and code of conduct 	<ul style="list-style-type: none"> Meetings; Official correspondence; Trainings. 	Before the start of construction

	workers	<ul style="list-style-type: none"> for temporary workers; Provide training to contractors on the code of conduct. 		
4	Local population	<ul style="list-style-type: none"> Provide information on safety measures and traffic management procedures during construction; Provide information on employment opportunities and opportunities for service provision, if any; Provide information on construction related grievance procedure. 	<ul style="list-style-type: none"> Big boards at the construction site; Safety signs posted on roads at dangerous sites; Newspaper announcements (e.g. "Priazovska Pravda"); Web site announcements. 	Before the start of, and during, construction
Construction Phase				
5	All stakeholders	<ul style="list-style-type: none"> Provide information on implementation of the ESAP, SEP, revision of documents, and new impacts (if any); Provide information on processing and responding to grievances. 	<ul style="list-style-type: none"> Newspaper publications (e.g. "Priazovska Pravda"); Web site announcements (www.rengydevelopment.com). 	Continuously during construction phase
6	Construction contractors, temporary workers	<ul style="list-style-type: none"> Monitor the performance of contractors and their implementation of the agreed plans and procedures; Provide additional training as required. 	<ul style="list-style-type: none"> Meetings; Official correspondence; Trainings. 	Continuously during construction phase
7	Local population	<ul style="list-style-type: none"> Collect and address any grievances. 	<ul style="list-style-type: none"> Official correspondence; Meetings. 	Continuously during construction phase
Operation Phase				
8	All stakeholders	<ul style="list-style-type: none"> Ongoing interaction and cooperation with stakeholders; Continue to provide information on the implementation of the ESAP; Collect and address any grievances. 	<ul style="list-style-type: none"> Media publications; Meetings; Correspondence. 	Throughout the lifetime of the project

3.3 Roles and Responsibilities

Grin Agro Servis will appoint a suitably qualified person who will have the overall responsibility for handling the consultation and information disclosure, including organisation of consultation process, communication with identified stakeholder groups, collecting and processing comments/complaints, and responding to any such comments and complaints. Depending on the nature of a comment/complaint, some of them may be forwarded to the appropriate person within the company for a response.

Name of the person and title	Affiliation and contact information
<i>Sergiy Komornyj</i> , Porogi 2 Project Director	Company: <i>Grin Agro Servis LLC</i> Postal Address: Ukraine, Kyiv, 72A Velyka

Vasylkivska St., 8th floor Phone: +38 044 585 9150 E-mail: info@rengydevelopment.com.ua

4 Public Grievance Procedure

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

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

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

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

All grievances will be registered and acknowledged within 5 days and responded to within 20 working days. *Grin Agro Servis* will keep a grievance log and report on grievance management, as part of annual project progress reports.

During construction, grievances in relation to construction activities will be managed by *Grin Agro Servis* and their construction contractor. People may also submit their complaints via the local government representation in Rykove.

Annex A Copies of Project Publications in Local Media

Annex B Public Consulation Minutes

Annex C Public Grievance Form (Form for public comments, complaints and reports)

Reference No:	
Full Name: Anonimous <input type="checkbox"/>	
Contact Information and Preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ By Telephone: _____ By E-mail _____
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem? Etc.
Date of Incident/Grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature: _____	
Date: _____	
Please return this form to:	
<u>Sergiy Komornyi, Porogi 2 Project Director</u> <i>Grin Agro Servis LLC</i> Postal Address: Ukraine, Kyiv, 72A Velyka Vasylkivska St., 8th floor Phone: +38 044 585 9150 E-mail: info@rengydevelopment.com.ua	