



Stakeholder Engagement Plan

GEORGIA PUBLIC BUILDINGS ENERGY EFFICIENCY PROJECT

2022

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Public

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1. INTRODUCTION

1.1. Background

This document is a Stakeholder Engagement Plan (SEP) for the Georgia Public Buildings Energy Efficiency Project. This document identifies relevant stakeholders and defines communication channels and plans regarding the energy efficiency measures to be introduced in Georgia.

The SEP provides an overview of national legislation, the European Bank for Reconstruction and Development (EBRD) Environment and Social Policy (ESP) 2014, the EBRD Performance Requirement 10: Information Disclosure and Stakeholder Engagement, European Union (EU) directives and international best practice related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a live document, being reviewed periodically during project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

Specific objectives of the SEP are detailed below.

1.2. Objective of the Plan

This SEP is a public document, which sets out the implementing body's commitments relating to stakeholder engagement, consultation and disclosure activities in connection with the proposed EBRD investment for the energy efficiency measures.

The Municipal Development Fund of Georgia (MDF) will be the government agency tasked with the project development and installation of the improved energy efficiency measures included in this Project. The public will be able to access and review this SEP (in Georgian and English) at the MDF head office¹ in Tbilisi, as well as on the [MDF website](#)².

The goal of this SEP is to set out how stakeholder engagement will be carried out for the Project and how long-term relationships between the Georgia Public Buildings Energy Efficiency Project and the local communities will be maintained. This SEP also aims to inform, improve and facilitate decision-making that involves Project-affected people and other interested stakeholders in an inclusive and timely manner, and to ensure that these groups are provided with sufficient opportunity to voice their opinions about the Project.

The SEP briefly describes the public consultation carried out to date, and defines activities that will be implemented by the Project to inform stakeholders about the nature and the potential impacts associated with the energy efficiency measures.

The SEP contains a stakeholder identification table where relevant stakeholders are identified with the most appropriate communication channels and strategies, information disclosure requirements and grievance processes that will be adopted. If there are stakeholders who are not included in the SEP they can get in touch with the contact provided above in Tbilisi and

¹ 3rd Floor, #150 D. Aghmashenebeli Ave., 0112, Tbilisi, Georgia

² www.mdf.org.ge

listed in section 6.4 on Roles and Responsibilities to receive information about the Project and be added to the stakeholder engagement programme in this SEP.

Specific objectives of the SEP are detailed below:

- Define the Project area;
- Identify, map and assess affected parties and other interested stakeholders, and how they may be affected by or interested in the Project;
- Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
- Ensure stakeholders have access to information on Project activities in a timely manner;
- Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
- Ensure that any vulnerable groups are identified and consulted;
- Establish clear mechanisms for answering stakeholders' questions, concerns and grievances; and
- Document formal consultation and information disclosure activities, define stakeholder tracking and records management system.

1.3. Scope of the Plan

This SEP covers MDF's operations on the Georgia Public Building Energy Efficiency Project, including the contractor's activities. The Plan comprises the following sections:

- Chapter 2 – Project Background
- Chapter 3 – Consultation and Disclosure
- Chapter 4 – Stakeholder Identification
- Chapter 5 – Stakeholder Engagement Programme
- Chapter 6 – Reporting and Grievance Mechanism

2. PROJECT BACKGROUND

The EBRD are considering providing finance to the MDF of Georgia to co-finance energy efficiency (“EE”) upgrade and rehabilitation of up to 200 public buildings across the country.

A Scoping Study to analyse the public building stock in Georgia was completed early 2019. The developed inventory in the Scoping Study covers over 4,000 publicly owned buildings within Georgia. The 200 buildings that will benefit of the Project will be chosen from this inventory.

The building renovation on this Project will include various EE and renewable energy measures and can, to a limited extent, include auxiliary works to enhance structural integrity increasing building lifespan. EE investments in public buildings is expected to include improvement of building envelope, and installation of more efficient heating, ventilation, lighting and air conditioning systems. These improvements could include:

- Thermal insulation of external walls;
- Thermal insulation of roofs;
- Replacement of windows;
- Installation of high-efficiency lighting; and
- Upgrade of building heating and ventilation, including replacement of inefficient and/or coal fired boilers, cooling, ventilation and air conditioning.

Structural strengthening and general building improvements might also be considered to a limited extent, due to the current state of decay of the existing public building stock, to ensure building integrity, extend building lifespan and protect investments in EE.

The proposed rehabilitation will mainly focus on existing schools, currently owned by the Ministry of Education and Science of Georgia (MoESG). However, other public buildings may also be included, owned by other Ministries (e.g. Ministry of Labour, Health and Social Affairs). MDF will establish a Project Team to manage all aspects of the day-to-day project activities.

3. CONSULTATION AND DISCLOSURE

3.1. National Legislative Requirements

The Constitution of Georgia was adopted in 1995. The constitution does not directly address environmental matters, however it lays down the legal framework that guarantees environmental protection and public access to information with regard to environmental conditions.

Article 37, Part 3 states that “any person has the right to live in a healthy environment, use the natural and cultural environment. Any person is obliged to take care of the natural and cultural environment.” Article 37, Part 5 states that “an individual has the right to obtain full, unbiased and timely information regarding his working and living environment.” Article 41, Part 1 states that “a citizen of Georgia is entitled to access information on such citizen as well as official documents available in State Institutions provided it does not contain confidential information of state, professional or commercial importance, in accordance with the applicable legal rules.”

Stakeholder engagement should be in line with the Convention on Access To Information, Public Participation and Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention). The Aarhus Convention was ratified in Georgia in 2000 and provides for:

- Citizens’ right to have receive environmental information held by public authorities;
- Citizens’ right to participate in environmental decision-making; and
- The right to review procedures and challenge public decisions that may have been made without respecting the first two aforementioned points.

Requirements for this Project

The specific requirements under national law for stakeholder engagement in Georgia exists only for projects which require an EIA and environmental permit application. This Project does not require an EIA or an environmental permit.

In national legislation, the stakeholder engagement required for this project is therefore dictated by what the **construction permitting** necessitates. Resolution #57 of the Government of Georgia regulates the construction permitting procedure and its terms and conditions. The landlord should place an information banner at the entrance to the site with a description of the project, indication of the owner and contractor implementing works on site. The contact details for the responsible persons should be also provided and the hotline number for the grievance mechanism displayed.

3.2. EBRD Requirements

The Project will adhere to EBRD Environmental and Social Policy (ESP) 2014 and the EBRD Performance Requirements (PRs). The EBRD PR 7 (Indigenous Peoples) and PR 9 (Financial Intermediaries) are not applicable for this Project.

The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key pertinent requirements of this PR are:

Table 1: EBRD PR10 Requirements

- Identify the various individuals or groups i) who are affected or likely to be affected by the Project; or may have an interest in the Project.
- Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.
- Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.
- Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.

3.3. Existing Stakeholder Engagement and Community Awareness Programmes

No public consultation or engagement has yet been carried out by MDF on this Project as it is currently at an early stage. A Project Team will be assembled, that will coordinate and carry out the necessary stakeholder engagement.

A contact page for MDF is currently provided on their website³, and MDF manages a number of active social media accounts (e.g. Facebook).

MDF has carried out many stakeholder engagement activities on previous projects funded by International Financial Institutions (IFIs). For example, in April 2019 they held a public hearing on the initial concept of for the Abastumani Central Part Urban Regeneration Project, backed by the World Bank. This event was attended by representatives of the MDF of Georgia, local authorities and all stakeholder parties. They have also carried out focus group discussions and interviews with Project Affected Persons as part of SEPs and Resettlement Action Plans on other large infrastructure projects.

This SEP has been created for this Project to ensure the MDF will be effectively engaging with those affected by this Project.

³ <http://mdf.org.ge/?site-lang=en&site-path=contacts/>

4. STAKEHOLDER IDENTIFICATION

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:

- a) Primary stakeholders - individuals and groups who are affected directly by the Project; and
- b) Secondary stakeholders - those parties which have influence on, but are not necessarily directly impacted by, the Project, and those indirectly impacted by the Project

The key stakeholders identified are presented in Table 2.

Table 2: Key Identified Stakeholders and Methods of Engagement

Stakeholder Category	Type	Name	Impact/Influence
Primary	Project Shareholders / Internal Stakeholders	Municipal Development Fund	This group will directly influence and impact the project through the decision-making process and the responsibility for implementation.
	Building Owners/Managers	Tbilisi City Hall; Ministry of Education, Science, Culture and Sport; Mtskheta Municipality Preschool Education Institution Union; Ministry of Labour, Health and Social Affairs; Kutaisi Municipality and other municipalities that will own/manage selected public buildings	Will benefit from the EE measures introduced, and provide representatives to ensure appropriate engagement between MDF and the building users.
	Communities & Businesses if any	Local businesses and public building users (including vulnerable groups i.e. women, pensioners, veterans, and any formal and informal persons and businesses) located in the buildings directly affected the energy efficiency works within Georgia.	The communities and businesses within the buildings may be affected due to temporary loss of access to certain entrances/exits.
	Vulnerable Groups if any	Hospital and health centre patients, students/pupils	These groups could be more significantly affected by this Project than other users and

Stakeholder Category	Type	Name	Impact/Influence
		(including those with learning difficulties and disabilities)	communities of the public buildings.
	Building representatives	Selected representatives of each building, nominated by the governing ministry/municipality of each building.	Disseminate information to the users of the buildings and share decisions of users to the Canton.
Secondary	NGOs	NGOs can participate in the meeting upon their will.	Will not directly impact the scope or construction on this Project.
	contractors	Contractors on the Georgia Public Buildings EE Project.	This group will directly participate in the implementation of the Project.
	Construction workers	Local individuals, based in Georgia.	Hired by contractors of this Project to carry out the construction works.
	Design Engineer/Energy efficiency specialist	Design and Energy efficiency specialist	Will provide detailed information regarding energy efficiency and designs for the 200 public buildings.
	supervision company/ companies	Works Supervision Consultant Engineer.	Will monitor and provide guidance on the implementation of the environmental management plans developed by MDF and the contractors.
	Permitting bodies, local governmental agencies	Local self-government bodies	This group will influence/impact on the Project through approving construction permits, enforcing new regulations and rules.
Lender	Lending Organisation	EBRD	This organisation will provide the loan to carry out the Project, alongside certain environmental, social and technical requirements.

4.1. Vulnerable Groups

The stakeholder identification process examined if there are any groups of affected people who might be more vulnerable to current and potential Project impacts.

During the assessments and the preparation of this SEP, it was assessed whether there will be any groups who might be affected by the projects differently due to their gender, age, ethnicity, religion, physical or mental disability or other attributes.

The assessment identified the following potential vulnerable groups:

- School children;
- Families of school children with less education or ability to access online information;
- Patients in medical centres;
- Disabled users of selected public buildings; and
- Users of victims of violence institutions (if buildings selected).

Additional engagement activities have been provided within this SEP to ensure that these vulnerable groups are suitably protected from potential impacts. During Project implementation, the supervising company/companies or contractors may identify additional vulnerable groups who will then be added to the SEP and appropriate communication methods will be identified. During the meetings with the school representatives, the categories should be identified and in general if there is a vulnerable group or person, meeting with them should be planned which will be carried out by the school representatives.

5. STAKEHOLDER ENGAGEMENT PROGRAMME

5.1. Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 3 below. The objectives of external communications are to provide continuous engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the Project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, EBRD PR 10 and Georgian national legislation.

The SEP is a live document that will be revisited and updated, if necessary, on at least an annual basis (or when changes are made) to reflect the changes in stakeholder engagement due to project developments and new stakeholders. The information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence. The external and internal communication methods and information for disclosure identified in Table 3 are not exclusive and MDF may choose to disclose more information upon request by stakeholders.

MDF is responsible for internal and external communications regarding the existing and future projects and will be the main contact point for affected people. All related Project documents and communication related to the Project will be available and undertaken in English and/or Georgian languages.

5.2. Stakeholder Engagement Programme

The Stakeholder Engagement Programme envisages that consultation meetings will take place with relevant interested parties prior to the commencement of the Project as well as during the project implementation, if necessary. Consultation and engagement activities are required to address current stakeholder suggestions, ideas or concerns. In order to receive their full engagement, stakeholders will be able to use several channels (phone, e-mail, and website) for receiving more details about the project or state their comments, ideas throughout the project life cycle. In-person and online meetings should be defined for engaging better communication due to the Covid-19 pandemic situation.

Basic consultation meetings will be carried out for stakeholders. These meetings will be conducted by MDF/PIU consultant with the support of MoESG Educational Resource centers before commencement of works. The building owners/managers, representatives, vulnerable people (if any), other interested parties can attend the meeting upon their will. Project measures and activities will be provided during the meetings and stakeholders will be informed about relevant safeguard documents such as the Environmental and Social Action Plan, the Environmental and Social Management Plan template to be used by contractors, SEP. Participants will be informed about procedures and the importance of the Grievance Redress Mechanism established at MDF. Attendees will receive information about contact persons for communication to submit complaints concerning environmental or social issues and/or expressing the comments and suggestions including channels for receiving information. Minutes will be taken at stakeholder meetings. Consultation process will continue; additional meetings with stakeholders will be carried out as needed during the project implementation. MDF/PIU consultant will be actively involved in providing information to the population, solving

problems or providing any assistance using Grievance Redress Mechanism. This mechanism enables unimpeded implementation of the Project and timely satisfaction of complaints.

Any concern or grievance raised prior or during the project implementation will be collated and logged by MDF, as well as by contractors, who will be informed about the grievance procedures during the selection process. Grievance Mechanism and Grievance Resolution is discussed in section 6.2. and 6.3 paragraph.

The contractors will assist in this process by escalating of any grievances received to the supervision company/companies and then to MDF, or directly to MDF. The supervision company/companies will be responsible for receiving grievance information from contractor(s) and sharing it to MDF. Stakeholders have the opportunity to use the channels the most convenient for them for submitting grievances or receiving information.

All comments received will be reviewed in accordance with the commitments made under best international practise presented within the 'EBRD Requirements' section provided in Section 3. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

The Stakeholder Engagement Programme is detailed in Table 3 below:

Table 3: Future Stakeholder Engagement Programme

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
<ul style="list-style-type: none"> ■ MDF 	<ul style="list-style-type: none"> ■ Internal MDF meetings with all involved specialists from MDF including the Project Implementation Unit (PIU) consultant; also Project Designer and contractors on a need bases ■ At least one E&S kick-off meeting with the PIU consultant to outline E&S requirements. Then the PIU consultant can develop an E&S reporting schedule to MDF ■ At least two meetings should be held with the Project Designer to first explain E&S requirements (e.g. disability access), and then review the designs ■ At least one meeting with each contractor 	<ul style="list-style-type: none"> ■ Updates on the ESAP, SEP and ESMP implementation if necessary. 	<ul style="list-style-type: none"> ■ Meetings held before construction upon contract signing, during construction

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
<ul style="list-style-type: none"> ▪ Representatives of the selected buildings (representing the Ministry or Municipality owning/managing the building) 	<p>to outline the E&S requirements</p> <ul style="list-style-type: none"> ▪ Meetings with Building Owners/Managers and representatives organized by PIU Consultant/Project Designer/supervision company with the support of Ministry of Education and Science of Georgia/Education Resource centres 	<ul style="list-style-type: none"> ▪ Illustrating images of new energy efficiency measures to be introduced and energy savings statistics. ▪ Schedule of works for each specific building. ▪ Temporary access limitations and measures being undertaken by contractor to limit disturbances. ▪ Specific measures put in place to ensure that school children and hospital patients are not negatively affected. ▪ Grievance Redress Mechanism 	<ul style="list-style-type: none"> ▪ Group meetings (number or meetings held on a need bases, with a minimum of 1 meeting) with all representatives and Building Owners/Managers before construction. ▪ At least 10 meetings with MDF/PIU consultant before construction. ▪ Notification to representatives of selected buildings of start of works at least one month prior to start of work. ▪ Meetings during the construction between the Contractor and the building representatives on a need bases ▪ Meeting with Building Owners/Managers and representatives during construction on a need basis. All representatives will be provided with the GRM contact persons s details and site manager details and able to visit MDF head office
<ul style="list-style-type: none"> ▪ Users of the affected buildings 	<ul style="list-style-type: none"> ▪ Meetings with building representatives to disclose Project information organized by PIU consultant/ project designer/supervision company 	<ul style="list-style-type: none"> ▪ Images showing examples of new energy efficiency measures to be introduced and energy savings statistics. 	<ul style="list-style-type: none"> ▪ Representatives to host 1 open sessions to all building users before construction begins. ▪ Meeting with building representatives

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
		<ul style="list-style-type: none"> ■ Schedule of works for each specific building. ■ Temporary access limitations and control measures being undertaken by contractor to limit disturbances if any. ■ Specific control measures put in place to ensure that school children and hospital patients are not negatively affected. ■ Grievance Redress Mechanism 	<p>during construction on a need bases</p>
<ul style="list-style-type: none"> ■ Vulnerable groups 	<ul style="list-style-type: none"> ■ Meeting with identified vulnerable groups organized by representative of buildings where necessary/required. (PIU consultant). 	<ul style="list-style-type: none"> ■ Images of new energy efficiency measures to be introduced and energy savings statistics. ■ Schedule of works for each specific building. ■ Temporary access limitations and measures being undertaken by contractor to limit disturbances if any. ■ Designs and revised designs ensuring appropriate access for disabled persons. Improved safety measures for women and girls. ■ Grievance Redress Mechanism 	<ul style="list-style-type: none"> ■ Number of women-only focus groups and disabled persons focus groups will be dependent on the locations of the selected public buildings. ■ Women-only focus groups will be conducted when works are carried out gender sensitive sites (e.g. maternity wards) or in areas where traditional beliefs do not promote the voice of women in society. ■ All public buildings will be represented by affected women (if needed) and disabled persons, with focus groups pooled for schools in the same areas.

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
<ul style="list-style-type: none"> ▪ NGO - Georgian Arts and Culture Center 	<ul style="list-style-type: none"> ▪ Meetings with the NGO representative in Tbilisi prior to construction commencement, during the construction and during operation. Project Designer/PIU consultant/supervision company/companies will organize the meeting with NGO 	<ul style="list-style-type: none"> ▪ Contractor profile, including permit to carry out construction works on protected buildings and previous experiences working on historic buildings. ▪ Contractor and MDF processes to ensure the protection of listed buildings (and subsequent proof of correct implementation through pictures). ▪ Images showing examples of new energy efficiency measures to be introduced and energy savings statistics. 	<ul style="list-style-type: none"> ▪ At least one meeting held before construction. ▪ At least 1 site visit for NGO representatives to ongoing selected construction sites. ▪ At least one meeting held after construction.
<ul style="list-style-type: none"> ▪ contractors 	<ul style="list-style-type: none"> ▪ Meetings attended by the MDF representatives periodically on a need basis. ▪ Meetings with supervision company/companies to report and discuss E&S measures and processes during construction. 	<ul style="list-style-type: none"> ▪ Updates on the ESAP, SEP and ESMP implementation on a need basis ▪ E&S issues and data shared with supervision company/companies and resolutions to issues found. 	<ul style="list-style-type: none"> ▪ MDF meetings held before construction upon contract signing, during construction ▪ Contractor E&S Leads to meet with supervision company/companies weekly during construction.
<ul style="list-style-type: none"> ▪ Construction workers 	<ul style="list-style-type: none"> ▪ Contractor E&S Leads instruct and direct contractor workers in E&S measures and processes on-the-job. 	<ul style="list-style-type: none"> ▪ E&S (particularly Health & Safety) measures and process to follow. 	<ul style="list-style-type: none"> ▪ Prior to construction starting.
<ul style="list-style-type: none"> ▪ supervision company/companies 	<ul style="list-style-type: none"> ▪ Meetings attended by the MDF representatives. ▪ Meetings with contractor to discuss E&S measures and processes during construction. 	<ul style="list-style-type: none"> ▪ Updates on the ESAP, SEP and ESMP implementation on a need basis. ▪ E&S issues and data shared with supervision company/companies 	<ul style="list-style-type: none"> ▪ MDF meetings held before construction upon contract signing, during construction ▪ Contractor E&S Lead to meet with Supervising Engineer weekly during construction.

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
<ul style="list-style-type: none"> Hired Design Engineer 	<ul style="list-style-type: none"> Meetings with MDF during the design phase of the buildings. 	<ul style="list-style-type: none"> and resolutions to issues found. Current designs shared with MDF and feedback given. 	<ul style="list-style-type: none"> Meetings between MDF and Design Engineer during design phase.
<ul style="list-style-type: none"> EBRD 	<ul style="list-style-type: none"> Annually and on-a-needs basis environmental, social and health & safety updates. Annual Environmental and Social Reports. Provided through meetings and/or email by the Project Director. 	<ul style="list-style-type: none"> Updates on the ESAP, SEP and ESMP implementation and overall E&S performance. 	<ul style="list-style-type: none"> Annually and on-a-needs basis meetings before construction, during construction, and during the duration of the project.

For more information and comments stakeholders will be able to use the contact information below:

Municipal Development Fund (MDF)

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In summary of the table above, four key communication methods for this assignment are described below:

MDF Environmental and Social (E&S) Meetings

These meetings will provide time for MDF/PIU Consultant to organise the implementation of environmental and social (E&S) actions, as well as an opportunity for the supervision company/companies and contractors to provide updates on their implementation of E&S actions during construction to MDF. The interaction between MDF and the contractors and supervising company will be stipulated in their scope of works and included in their individual contracts. This will involve regular, daily communication between all three parties.

Building Representative Meetings

A list of the representatives for all selected public buildings must be finalised before the beginning of construction, and included in this SEP. These individuals will be the main communication between the users and employees of these buildings and project designer/PIU Consultant. These individuals should be nominated by the governing ministry/municipality of each building. All professionals selected to undertake this role must be in possession of an employment contract from the governing ministry/municipality and should work in the selected building on a daily basis.

The Project measures and activities will be explained through these representatives. Representatives should meet with building owners/managers and project designer/PIU Consultant, and separately with the users, before construction commences and periodically during construction to inform on Project progress and consult on on-going issues. Formal minutes and attendance registers must be taken during these meetings. When selected, the lead Site Engineer of the contractor should also attend these meetings during construction.

Building Owners/Managers, with support and overseen by the MoESG will discuss suitable temporary replacement buildings provided for schools and hospitals if works include significant structural improvement and require the temporary relocation of these public buildings. Building Owners/Managers, with support of the PIU Consultant and the project designer/supervision company, should also provide assistance during this move, as well as the transition from the temporary location to the rehabilitated building;

As part of these meetings, users should be made aware that disability access to the buildings will be maintained throughout the course of the construction period. Further, if any issues are identified from vulnerable groups, these must be passed on to MDF for discussion and resolution.

MDF will specifically discuss the measures to be put in place by the contractor for the protection of students and hospital patients with the building representatives of selected hospitals, schools and kindergartens. These measures will include:

- Timing of construction works to avoid active school periods (i.e. holidays);
- All contractor workers screened to ensure no worker possesses a criminal record, for strategic or sensitive buildings
- Works carried out in sections for hospitals (e.g. floor-by-floor) to ensure patient privacy and avoid noise disturbances;
- Separate entries to buildings provided for workers to ensure construction works separation from students and patients;
- Take relevant safety measures for pupils; ensure safe access to schools, hospitals, kindergartens.

Women only (where necessary) & Disabled Persons Focus Groups (FGs)

These focus groups aim to ensure that the requirements and opinions of women and disabled persons are understood and mainstreamed within the design, development and execution of the Project. Small in size, these focus groups will provide a setting for women and disabled persons affected by this Project to voice their opinions and concerns in a safe environment.

These FGs will be carried out where necessary/required before and during the construction stage of the Project by the building representatives/PIU consultant. Design Engineers will also participate in these FGs during the design stage in order to ensure that designs consider and include the specific needs of these individuals (e.g. improving disability access where structural improvements to buildings is planned). These Design Engineers will be hired for this project.

Digital Media Engagement

MDF website together with other methods will be used for information sharing purposes. Beneficiaries will have possibility to submit questions/comments. MDF PR department with support of PIU consultant will be responsible for monitoring and responding to reactions, comments, questions and pictures submitted, as necessary.

NGO Meetings

Project Designer and PIU Consultant will provide updates on a need bases to the NGO Georgian Arts and Culture Center to demonstrate the processes implemented to ensure the protection of listed buildings (if selected on this Project)..

EBRD E&S Meetings

MDF will provide annually (and on-a-needs basis) environmental, social, health and safety updates to the European Bank of Reconstruction and Development during the construction phase. These updates will demonstrate the implementation of E&S actions agreed before the loan ratification. This includes actions to be carried out by the contractors and the Supervising Engineer.

6. REPORTING AND GRIEVANCE MECHANISM

6.1. Monitoring, Reporting and Feedback Mechanisms

MDF will monitor the communication channels and will provide feedback as appropriate. A complaint box at project sites and the MDF head office will be available for stakeholders and will also be available online. Stakeholders can submit their complaints by phone and e-mail. Any complaints will be registered in the log for complaints by the MDF contact person. Contact person responsible on GRM will be designated from MDF side, contact details will be shared through stakeholders during public and consultation meetings. GRM is two stage process that is clearly discussed below.

In order to monitor the implementation of this SEP and the functioning of the grievance mechanism, MDF will confirm to EBRD that the arrangements are in place and operating before construction begins. This will include the sharing of documentation on public hearings, information disclosure and any other form of stakeholder engagement undertaken as part of the SEP. In line with MDF's submission of the Annual E&S Report, EBRD will also annually assess the SEP implementation.

6.2. Grievance Mechanism

MDF operate a Grievance Redress Mechanism (GRM), established previously in-line with international best practice.

Any comments or concerns can be brought to the attention of the company verbally or in writing or by filling in a grievance form. The grievance form and information on the procedure (including contact persons) will be made available on the MDF website, during consultations and other engagement activities, and at the 200 public buildings once construction has commenced. Information banners will also be placed on designated noticeboards at each construction site.

GRM contact person will be designated from MDF. All grievances, including anonymous submissions, will be recorded in the GRM log. Supervision company/companies and MDF will cooperate closely, sharing all information regarding any complaints or dissatisfaction.

The MDF GRM log stores the following information:

- Complaint number
- Donor
- Project
- Location, Cadastre number of the land plot
- Type of input
- Category
- Gender
- Disability
- Name of affected person
- Address
- Date of complaint receipt
- How complaint was received
- Who received the complaint

- Date of respond
- Date of final resolution
- Description of the issues/complaints
- Contact details of affected person
- Notes, undertaken actions
- Entities involved
- Status of the issue
- Number of days between complaint receipt and complaint acknowledgement
- Number of days between complaint receipt and complaint resolution

Complaints can be submitted in written and verbal form, by email (feedback@mdf.org.ge) or by phone call (+995 598 88 20 19).

6.3. Grievance Resolution

Grievances can be submitted either on site by using grievance box or using other channels such as e-mail, phone number, web page. The grievance forms will be available on site and stakeholders can fill anonymous complaints if needed. If grievances are submitted on site, contractors will be responsible for logging complaints and solve them according to Stage 1. In case contractor cannot solve the complaint MDF will be involved in the process as it is described on Stage 2. The supervision company will be responsible for receiving complaint log from contractors and sharing it to MDF. Stakeholders have the opportunity to use one of the stages for submitting grievances. They can directly apply to stage 2.

All verbal or written complaints or grievances will be logged immediately after receiving to the contractors or to MDF. Complaints will be responded according to Georgian legislation. They are to be acknowledged and responded (first response) within 10 working days. A resolution is expected within 30 working days or 60 working days, depends on the complexity of issue. MDF will aim to respond to complainants and resolve the issues as quickly as possible from the date of receipt.

Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

Grievances submitted will be solved and followed-up in accordance with the procedures given below:

- **Stage 1** – Contractors with supervision company/companies receives and solves complaints. If at Stage 1 the project-affected person's (PAP) complaint is not solved, the PAP should be informed about grievance resolution procedures of Stage 2. The PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. MDF will be aware of all the grievances submitted at Stage 1 through the logbook, and will monitor their resolution remotely.
- **Stage 2** – MDF receives and solves complaint. A Grievance Redress Committee exists at MDF to resolve complaints. (Appendix 1)

The PAP has the right to apply to the Court in case his/her complaint was not resolved on the Stage 1 and Stage 2.

6.4. Roles and Responsibilities

MDF as the implementing agency has overall responsibility for project implementation and safeguard compliance. For ensuring all project related activities are carried out in accordance with Georgian legislation as well as International Financial Institution's policy.

Contact details:

Municipal Development Fund of Georgia (MDF)

Address: 3rd Floor, #150 D. Aghmashenebeli Ave., 0112, Tbilisi, Georgia

Phone: (99532) 2437001; 2437002; 2437003; 2437004

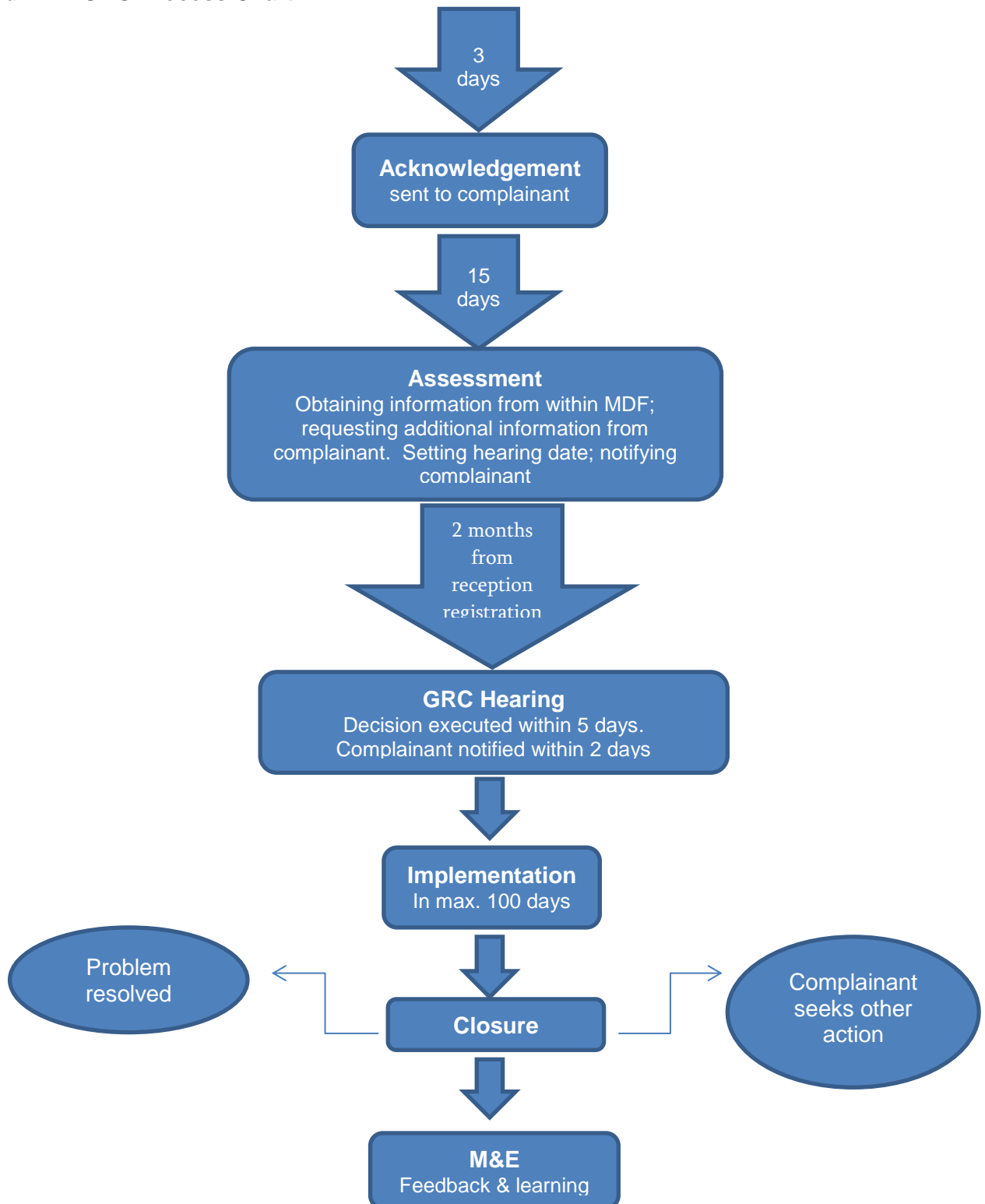
Fax: (99532)2437077

Email: mdf@mdf.org.ge

The supervision company/companies and contractors will assist with this SEP process by elevating complaints to MDF for their redressal. Any complaints received by the supervision company/companies or contractors will be noted on site and passed on to MDF. This will be stipulated via the tender documentation and the Code of Conduct for the supervision company/companies and contractors.

APPENDIX I – Complaint procedure and Grievance form

Appendix I.1. GRC Process Chart



Appendix I.2. Grievance Form



Your Feedback is very important for us

Remember that your feedback may be our opportunity to fix problems better and improve our activities

Share your feedback with us

1. Project name / Work Location - Municipality, Borough, Village, Town, Street

2. Comment Information Suggestion (Please fill in case of sharing only comments, information or suggestion)

3. Complaint (Please fill in case of making complaint)

Descriptions of the issue: _____

Request: _____

If you would like your feedback to remain anonymous, please provide only a date in the box below

Date:	Phone number:
Full name: ID:	Address:
E-mail:	Signature:

Please return this form to:

Municipal Development Fund (MDF)

Nutsa Gumberidze

Beneficiary Relations Specialist

3rd Floor, #150 D. Aghmashenebeli Ave., 0112, Tbilisi, Georgia

(99532) 2437001

ngumberidze@mdf.org.ge

APPENDIX II – List of Buildings

No.	Title of Building	Municipality	Type of Building	Building Representative
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
Etc.				