

**UE Minskvodokanal**

**Stakeholder engagement plan**

**February, 2021**

# **MINSKVODOKANAL WASTEWATER TREATMENT PLANT STAKEHOLDER ENGAGEMENT PLAN**





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## LIST OF ABBREVIATIONS

Abbreviation	Description
CHE	Centre for Hygiene and Epidemiology
Company	Unitary Enterprise “Minskvodokanal”
CLO	Community Liaison Officer
DCS	Digital control system
BAT	Best Available Techniques
EBRD	European Bank for Reconstruction and Development
ECAs	Export Credit Agencies
EIA (OVOS)	Environmental Impact Assessment
EIB	European Investment Bank
EPIII	Equator Principles III
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
EU	European Union
GoB	Government of Belarus
IFC	International Financial Corporation
MWWTP	Minsk Wastewater Treatment Plant
NGO	Non-governmental organisation
NREP Committee	Natural Resources and Environment Protection Committee
NTS	Non-Technical Summary
OECD	Organization for Economic Cooperation and Development
PIP	Priority Investment Programme
PR	Performance Requirement
Project	Reconstruction of the Minsk Wastewater Treatment Plant
RB	Republic of Belarus
SEP	Stakeholder Engagement Plan
SPZ	Sanitary Protection Zone
SUE	State Unitary Enterprise
UE	Unitary Enterprise
UNECE	UN European Economic Commission
UV	Ultraviolet
W&WW	Water and wastewater
WWTP	Wastewater Treatment Plan

# 1. INTRODUCTION

## 1.1 Introduction to the Stakeholder Engagement Plan

The first revision of the Stakeholder Engagement Plan ("SEP") was prepared as part of the Environmental and Social Impact Assessment ("ESIA") process back in April 2018 that was conducted in respect of the Priority Investment Programme ("PIP") for the reconstruction of the wastewater treatment facilities in the city of Minsk ("Project") operated by the Unitary Enterprise "Minskvodokanal" (the "Company"). The ESIA package, including this Stakeholder Engagement Plan, is specifically developed to achieve compliance with international lender requirements, particularly the European Bank of Reconstruction and Development (EBRD or the Bank) Performance Requirements ("PRs") and Environmental and Social Standards ("ESSs") of the European Investment Bank (the "EIB"). This document is the second revision of the SEP. Its preparation was driven by the Project progress and the change in the Project's key stakeholders including the need to update the stakeholder engagement methods and engagement programme for the respective phases of the Project.

In line with above-mentioned standards, this SEP is structured as follows:

- Chapter 1 includes a brief description of the Project and its current status, and potential environmental and social impacts of the Project.
- Chapter 2 defines legal requirements relevant to the Project implementation.
- Chapter 3 gives a description of UE "Minskvodokanal" current approach to stakeholder engagement.
- Chapter 4 provides a description of engagement activities implemented by the Project to-date.
- Chapter 5 identifies Project stakeholders and engagement methods.
- Chapter 6 proposes the engagement programme.
- Chapter 7 describes the grievance mechanism for the Project.
- Chapter 8 explains monitoring and reporting indicators.
- Chapter 9 describes implementation arrangements and resources allocated by the Project to stakeholder engagement activities and grievance management.

Additional information regarding the Project, grievance mechanism and planned stakeholder engagement activities may be received via:

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## 1.2 General Information

The EBRD and EIB provided Sovereign guaranteed loans of EUR 84 million each to the Government of Belarus ("GoB") to finance reconstruction of the Minsk wastewater treatment Plant ("MWWTP"). The total project costs are estimated at EUR 168 million.

The Project objectives include: (i) reconstruction of MWWTP to eliminate odour, optimise use of the existing facilities and enhance wastewater treatment efficiency of the plant in line with national and European Union ("EU") requirements, and (ii) construction of a sludge treatment facility (including digestion, dewatering, drying and incineration) in line with EU best available techniques (BAT) within the MWWTP site.

Once implemented, the Project will lead to: (i) EU-compliant treatment of the entire flow of wastewater, (ii) a reduced level of odour, and (iii) an EU-compliant solution for sludge management

and disposal. The Project is expected to substantially contribute to the reduction of pollution in downstream river Svisloch, and subsequently the Dnieper River.

### 1.3 Project Information

#### Minsk Wastewater Treatment Plant

MWWTP operated by UE "Minskvodokanal" is the country's largest facility for collection and treatment of wastewater which currently treats 95% of domestic wastewater from residential areas of the capital city and its neighbour settlements, as well as industrial effluents from dozens of industries.

The MWWTP receives almost 500,000 m<sup>3</sup> of wastewater per day. This flow is distributed for treatment between two sites: the main facility, MWWTP-1, dating back to 1963, and the less loaded facility of MWWTP-2 commissioned between 2006 and 2015.

Treatment process at MWWTP consists of two stages:

- 1) removal of debris, mineral and organic particles and floating matter in a series of inlet chambers, mechanical step screens, grit removal basins and primary sedimentation tanks;
- 2) biological treatment of clarified wastewater with activated sludge a system of aeration tanks, followed by secondary sedimentation tanks for removal of suspended solids.

The collection channel brings the effluents to River Svisloch.

The adopted treatment process features generation of large volumes of mixture of primary sludge and treated activated sludge. 650-700 tons of dewatered sludge is transported every day by road to a remote disposal site – the Volma sludge facilities in Lugovoslobodsky rural municipality of Minsk district located downstream along the flow of River Svisloch. Volma site territory is by more than three times greater than the WWTP site, and the estimated total volume of sludge stored at this site is about 5 million m<sup>3</sup>. Some of the sludge lagoons have been recultivated including planting of trees, while other lagoons are waterlogged, which means that contaminated drainage water has to be collected and transported back to MWWTP for treatment.

#### Why reconstruction?

Reconstruction is needed for the following reasons:

- air quality in the approved sanitary protection zone and adjacent regulated territories meets the formal requirements, however complaints of local communities about strong odour indicate the need for reconstruction of the plant facilities with large open surfaces for evaporation;
- technical survey conclusions which are provided in the materials of EIA 2016 indicate the need for reconstruction, repair or dismantling of major part of buildings and structures at MWWTP-1 site;
- despite satisfactory chemical property of treated effluents discharged to River Svisloch, state of the river downstream of the discharge point is poor, as a result of accumulated environmental damage and low self-purification capacity of the water course<sup>1</sup>; thus, mitigation is required;
- no reserve capacity is available at the Volma sludge disposal site, and the remaining capacity is only enough to serve the needs during next 4-5 years; a new sludge disposal site would be unfeasible as no suitable sites are available in the vicinity of MWWTP, and such approach would entail high environmental risks, unreasonable use of land resource, extensive impacts on air and geology, high cost of monitoring the site and surroundings, as well as remediation costs after decommissioning;
- unused valuable energy content of wastewater sludge.

#### Reconstruction history: options and opportunities

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<sup>1</sup> Draft Water Resource Management Plan (Upper Dnieper Pilot Basin, Belorussia. – Minsk, RUP ZNIIVR, 2014.

Solutions for reconstruction of MWWTP have been a matter of active discussion since early 2000-s. The Minsk Development Master Plan provided inter alia for:

- advance construction of the MWWTP for gradual extension of treatment capacities to meet the growing needs;
- reduction of industrial effluent discharges to the municipal sewerage system;
- arrangements for disposal of sludge generated by wastewater treatment processes at MWWTP;
- reconstruction and upgrading of MWWTP-1.

The above provisions were subsequently incorporated in the Sector Development Scheme for Minsk sewerage system for the period until 2030 which was developed by UE MinskEngProject in 2007. The construction of sludge disposal facilities driven by the pressing need to reduce volumes of storage and burial of this type of wastes became the core element of the MWWTP reconstruction project.

Assessment of environmental and economic performance of various sludge disposal solutions was conducted in 2001-2015. Experts from a number of sector-specific research and design institutions contributed the review of potential process alternatives. After preliminary assessment of several alternatives, detailed comparative analysis of technical performance was provided for two sludge treatment options:

- 1) thermophilic digestion to produce biogas followed by incineration of digested sludge;
- 2) high-temperature drying of sludge and utilization of the product for cement production.

In 2015 it was decided to increase MWWTP-1 capacity to 550,000 m<sup>3</sup>/day.

By the beginning of 2018, UE “Minskvodokanal” supported by Sweco Danmark A/S and CJSC “DiArKlass” completed supplementary technical feasibility studies including assessment of potential alternatives. The preferred reconstruction option identified as a result of the analysis provides for sludge treatment process including digestion, dewatering and incineration, with a corrected design wastewater flow rate of 394,000 m<sup>3</sup>/day on MWWTP-1.

#### Approved scope of MWWTP reconstruction

The proposed Project includes reconstruction of MWWTP-1 facilities and construction of sludge treatment facilities comprising digestion, dewatering, drying and incineration of sludge to generate thermal and electric energy for the treatment plant needs that are compliant with EU BAT for WWTP sludge management. The Project will be implemented at the existing site of MWWTP-1.

The main wastewater treatment processes are not subject to any substantial changes: the mechanical pre-treatment and full biological treatment will be complemented by UV disinfection.

The Project includes a range of measures intended to enhance wastewater treatment processes and reduce environmental impacts. In particular the Project provides for the following:

- Upgrading and reconstruction of selected treatment facilities and auxiliary, utility systems, equipment (sedimentation tanks, grit basins, aeration tanks, pumping stations, etc.) to enhance wastewater treatment performance, energy efficiency and MWWTP operational reliability;
- provision of enclosures on mechanical treatment facilities and collection of gas from buildings and facilities of MWWTP-1 (inlet chamber, screening chamber, grit basins, primary sedimentation tanks, waste water transportation channels between facilities) and its removal to the new wet scrubbing facilities, to reduce odour emissions;
- implementation of nitrification and denitrification technology for biological removal of phosphorus and overall improvement of wastewater treatment quality, which will help to significantly weaken eutrophication processes in River Svisloch;
- implementation of automatic process monitoring systems to enhance controllability and processes reliability at the treatment plant;
- implementation of effluent UV disinfection system using a gravity-flow unit will help to improve effluent water safety;

- demolition and removal of facilities which are not in use anymore (digesters, contact tanks, etc.) or are unsustainable (sludge beds, open channels for transportation of wastewater, grit basins, etc.)

#### **1.4 Project phases**

The Project is now under implementation involving the following key phases:

- Project identification and selection of the sludge treatment process (before the end of 2020);
- Construction and commissioning (2021-2026);
- Operation (from 2026 onwards).

#### **1.5 What will happen with the Volma sludge lagoon as a result of the Project?**

Volma sludge facilities are not part of the Project decisions and investments in the WWTP rehabilitation. Currently MVK takes a series of measures to mitigate adverse odour impacts associated with the operation of the Volma sludge lagoons. In particular these measures involve:

- Planting of green belts
- Trial deodorization of sludge lagoons
- Technical measures such as sheltering of freight transport delivering dehydrated sludge to the Volma sludge facilities.

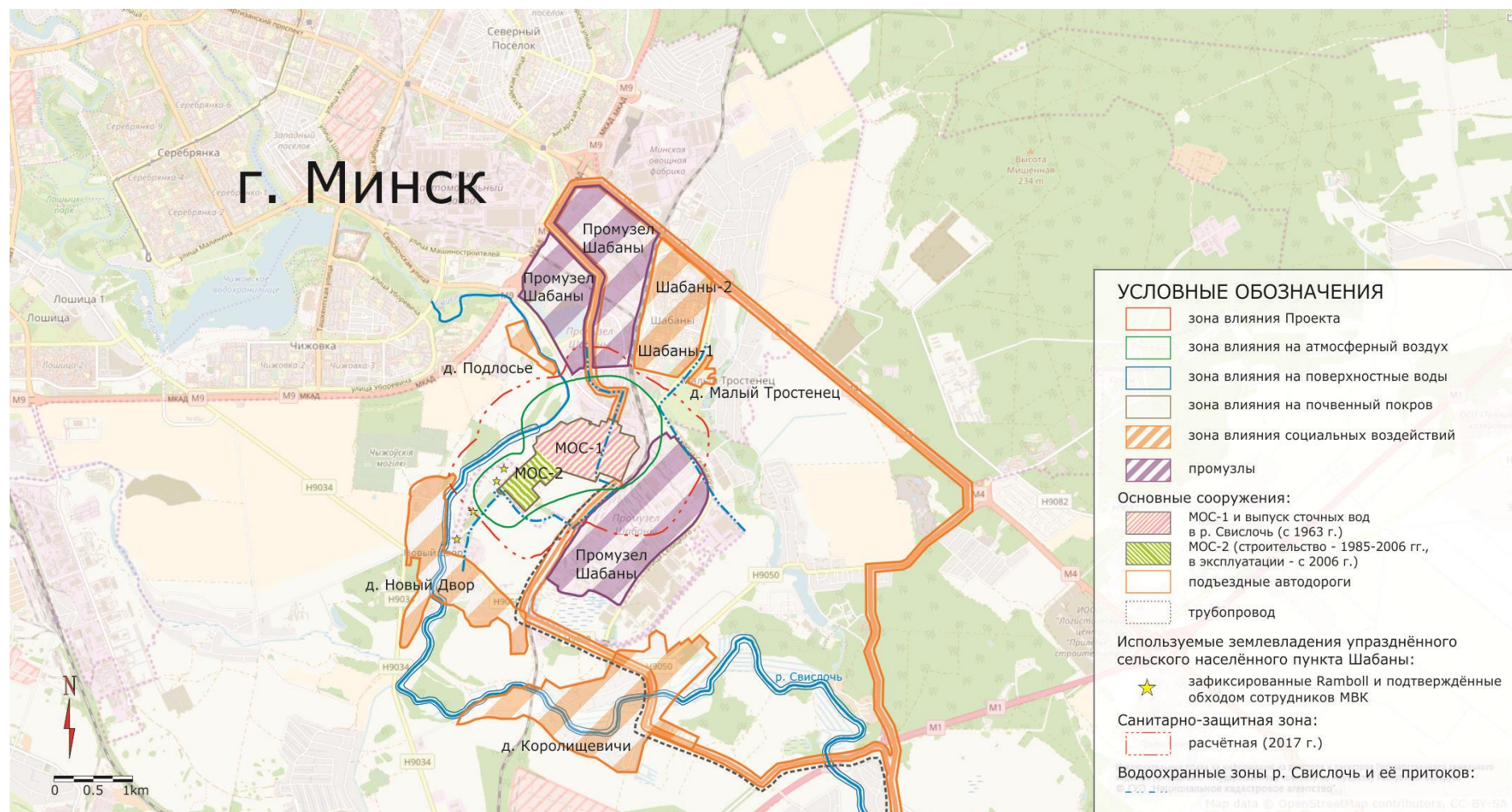
Upon completion of the WWTP rehabilitation project the Volma sludge facilities will be closed, and the area will be reinstated so that the issue of unpleasant odour that disturbs local communities is addressed and closed. This measure is a commitment taken by MVK in the Project agreements and included in item 3.4 of the Environmental and Social Action Plan (ESAP). In compliance with the ESAP, prior to commissioning MVK will develop and implement the Volma Sludge Facilities Decommissioning Plan including the following mitigation measures (not limited to):

- A set of mitigation measures to minimise the impacts on the local community health and safety from the sludge facilities
- Monitor air quality in the residential areas in the vicinity of the sludge lagoons and include in the list of monitored parameters the substances that are formed in the process of uncontrolled anaerobic fermentation of the stored sludge (e.g. ammonia, hydrogen sulphide and others)
- Monitor ground water quality in wells in the area of influence of the sludge facilities
- Maintain the system for drainage water disposal to treatment as long as needed, up to the time of the facilities conservation or remediation
- Develop conservation and remediation measures for sludge lagoons after the MOS reconstruction completion and sludge treatment facilities commissioning
- Regular progress reporting on the Plan implementation.

The Volma decommissioning project will comply with the applicable information disclosure to stakeholder engagement requirements.



Figure 1.1: Project location and the area of influence



Source: UE "Minskvodokanal"

## 2. STANDARDS RELEVANT TO STAKEHOLDER ENGAGEMENT

Activities outlined in this SEP are consistent with the Legislation of the Republic of Belarus, including the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters known as the Aarhus Convention ratified by Belarus on 9.03.2000, as well as with EBRD's policy requirements on information disclosure and stakeholder engagement (PR 10). Belarus and EBRD's stakeholder engagement requirements are summarised in Table 1 below.

EBRD Environmental and Social Policy (2014) and EIB Environmental and Social Standards (2018<sup>2</sup>) consider public involvement an integral part of any business and corporate responsibility in relation to the public, and a way to improve the quality of projects. Efficient public involvement and project-related information disclosure play an essential role from the viewpoint of efficient management of risks associated with public relations and provision of maximum benefits for the communities.

In particular, EBRD PR10 and EIB ESS10 require that the stakeholder engagement process involves the following key steps:

- **Stakeholder Identification and Analysis.** The first step to be made by the Project initiator to ensure successful relations with stakeholders is the identification of various individuals or groups who (a) are affected or will be affected directly or indirectly by the Project implementation or (b) can be interested in the project ("other interested parties"). Project proponent shall also identify whether vulnerable groups may be affected disproportionately by planned activities.  
Stakeholder analysis needs to clearly identify and differentiate between the different types of stakeholders, including consideration of their rights, roles, duties and responsibilities. Such analysis will help identify all impacted individuals and communities as well as government agencies, promoters and other parties who have the obligation and responsibility to ensure that these rights are upheld.
- **Stakeholder Engagement Plan / Engagement Planning.** The project initiator will develop a Plan describing how engagement with identified stakeholders will be carried out throughout the project life cycle, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders as well as characteristics and interests of the project-affected parties and other interested parties.  
Stakeholder engagement should be built into an operation's planning in a way that enables a meaningful information exchange with all identified stakeholder groups at the very outset of the project and at subsequent key decision-making points in its life cycle.
- **Information disclosure.** Information disclosure practices are built into the stakeholder engagement process as they help affected parties and other stakeholders embrace risks, impacts and benefits of the project. PR 10 and ESS10 emphasize the necessity to disclose information in the local language(s) taking into account any vulnerable or minority groups and their right to equitable representation and consideration for their rights, views and interests.

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<sup>2</sup> IEB Environmental and Social Standards were originally adopted in September 2010 as part of the EIB Environmental and Social Handbook (the Handbook), which is subject to periodic review, revision and approval by the Bank's Governing Bodies. The Handbook is a "live" document that undergoes continuous improvement with the evolution of knowledge and experience, as well as changes in policy and practices. These Standards were published in 2013 as part of a different document. In 2018, they were published in a stand-alone document, without any modification to the Standards themselves.

The following information shall be made available to the communities: (i) the purpose nature, objectives and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential adverse impacts on communities arising from the project; (iv) the proposed mitigation plans and associated budget; (v) the available grievance mechanisms; (vi) any added value and opportunities for benefit-sharing; (vii) the envisaged consultation process, if any, and opportunities and ways in which the public can participate; and (viii) time and venue of any envisaged public meetings, and the process by which meetings are notified, summarised, and reported.

- **Meaningful consultations.** Meaningful consultation is a two-way process that begin early in the project planning process, informs the project design and continues on an ongoing basis through the project lifecycle.

The Consultation process shall provide an opportunity for the affected parties to express their comments about the risks and impacts associated with the Project and relevant mitigation measures, as well as permit the project initiator to consider such comments and respond to them.

- **Grievance mechanism.** Stakeholder engagement requires that an effective grievance mechanism, process or procedure is established in the project development process, to receive and facilitate resolution of stakeholders' concerns and grievances. Such a mechanism shall: (i) allow for anonymous complaints to be raised and addressed, (ii) guarantee confidentiality, (iii) be legitimate and trusted, (iv) accessible and free of cost for all interested parties, irrespective of their literacy and administrative capacity, (v) be fair, transparent and inclusive, (vi) be guided by engagement and dialogue, (vii) be predictable in terms of process and timely, (viii) not impede the access to grievance and resolution on grounds of one's financial ability to seek judicial remedy and (ix) be a source of continuous learning for the initiator and the lending operation at large.
- **Monitoring and reporting.** A SEP shall make provisions for continuous reporting on the project's environmental and social performance, including disclosure methods and channels (e.g., via hard copies, or project's website, during community meetings or public hearings, through publication of the project NTS, etc.). Project reporting shall be minimum once a year. The project initiator is required to monitor the implementation of the stakeholder engagement plan and the performance of the grievance mechanism and report on both. Monitoring and reporting procedures must be established as an integral component of a project's environmental and social management system. In terms of monitoring, it is recommended to involve independent third parties (e.g. civil society organizations (CSOs), non-governmental organisations (NGOs), national human rights institutions) or to facilitate community-driven monitoring, where practical and acceptable by the communities concerned.

EBRD PR10 and EIB ESS10 also elucidates the necessity of disclosing to identified stakeholders actual and up-to-date information of the adverse impacts and significant alterations to the planned project should they occur. If such impacts and alterations are significant, the project initiator may need to carry out additional information disclosure and consultation.

Public participation is mandatory during the Belarusian environmental impact assessment ("EIA" or "OVOS") process. Consultation with local communities take form of information disclosure and public discussions. For full acknowledgement of public opinion on the Project activities, any stakeholder complaint needs to be conveyed to the competent authorities as also ruled by a number of codes (e.g. Water Code and Forestry Code of the Republic of Belarus). Public discussions may be held in relation to:

- Design of environmentally significant decisions, such as:
  - Concepts, programs, plans and schemes, implementation of which triggers environmental impact and/or is connected to use of natural resources and/or alteration of them (not deemed to be applicable for the context of the current Project);
  - Regulatory legal act design (not deemed to be applicable for the context of the current Project);
  - Decisions of issuing a permission to remove and/or replant vegetation.
- Strategic environmental assessment (not deemed to be applicable for the context of the current Project);
- Environmental Impact Assessment (EIA or OVOS) reports.

In case of the current Project, public discussions should be initiated by

- local executive and regulatory authorities (for issuing the permissions); and
- local Councils of representatives, local executive and regulatory authorities of the administrative-territorial entities that will be affected by proposed economic activity, **together** with proponent of the proposed economic activity (for EIA).

Overall EIA public discussions involve the following:

- Notification on public discussions containing:
  - Information on a project proponent;
  - Justification and description of the planned economic activity;
  - Information on a decision made by a relevant authority in relation to the project;
  - Information on a planned location of the project;
  - Timeframes of a project;
  - Timeframes of public discussions to be held;
  - Information on the venue where EIA report is made available;
  - Information on a local executive and regulatory authority in charge of public discussions' arrangements;
  - Timeframes and procedure of an application to arrange EIA public discussions;
  - Date and venue of the notification.
- Distribution of an EIA report among relevant authorities and its placement in their offices and on the websites of these authorities;
- Ensuring that all interested parties have an opportunity to place their comments, concerns and propositions to an EIA report during the whole period of public discussions;
- In the event of public assembly application is submitted by citizens or organizations to relevant authorities in the period of 10 days after a start of public discussions, this assembly may be appointed to a date not earlier than 25 days after the start date of public discussions and not later than their end date;
- In case the assembly is called, its procedure will include:
  - Registration of the participants;
  - Report made by of the project representative (oral and/or in a format of presentation);
  - Design organization report (presentation format);
  - Participants' questions, comments and propositions (oral and written) and answers to them (if the questions cannot be answered immediately, the

answers must be provided to relevant address or e-mail within 10 days after the date of the assembly);

- Speeches made by citizens and organizations' representatives;
- Assembly's log to be finalized within 5 days after the assembly.
- Public discussions' protocol to be finalized within 10 days after their end date and signed by the members of the commission of preparation and conduction of public discussions.

**Table. 2.1** contains an overview of legal requirements of Belarus and EBRD / EIB in regard to stakeholder involvement.

**Table. 2.1: Summary of key stakeholder consultation requirements by EBRD / EIB and Belarus**

EBRD PR10 / EIB ESS10	Belarus requirements
<i>Stakeholders identification and analysis</i>	
Identify people or communities that are or could be affected by the project, as well as other interested parties including vulnerable and disadvantage groups who may be differentially or disproportionately affected by the project because of their vulnerable status.	<p>Stakeholder identification is required in line with Aarhus convention during the discussion of planned state programmes or other legal document initiated by a governmental body according to the Resolution of Council of Ministers of the Republic of Belarus of 14.06.2016 #458. The same document, however, does not indicate this as a requirement for EIA reports discussion. During EIA public discussions the document refers to stakeholders as 'citizens and/or organisations'.</p> <p>No special attention to vulnerable or disadvantaged groups is drawn.</p>
<i>Engagement timeframes</i>	
<p>Maintain a constructive relationship with stakeholders on an <b>ongoing basis</b> through meaningful engagement during project implementation.</p> <p>Begin consultations <b>early</b> in the environmental and social appraisal process.</p>	<p>Public discussions of national EIAs shall be not less than 30 calendar days after the EIA is made publicly available (according to Resolution of Council of Ministers of the Republic of Belarus of 14.06.2016 #458). Start/end dates of public discussions is indicated in the Notification of public discussions.</p> <p>The timeframes for public discussions of issuing the permissions follow the order approved by the Council of Ministers of the Republic of Belarus.</p>
<i>Information disclosure procedure</i>	
<p>Timely disclosure of relevant information to the identified stakeholders on potential environmental and social risks and impacts that could potentially affect them in compliance with the Stakeholder Engagement Plan.</p> <p>Throughout the life of the project provide ongoing information to identified stakeholders, commensurate to the nature of the project and its associated environmental and social impacts, and the level of public interest.</p>	<p>Water Code of the Republic of Belarus (Chapter 3, Article 17) indicates that citizens and community associations have a right to receive environmental information in relation to water use and water protection in line with relevant environmental legislation.</p> <p>Resolution of Council of Ministers of the Republic of Belarus of 14.06.2016 #458 indicates that Notification of public discussions in relation to EIA is made available in printed media and on the official website of the proponent of the public discussions</p>



<p>Disclose a non-technical summary in the Belarusian and Russian languages and in accessible and culturally appropriate manner.</p> <p>Publish regular reports to external stakeholders on company's environmental and social performance.</p> <p>Implementation monitoring and performance assessment of the SEP and the grievance mechanism.</p>	<p>no later than the start date of the public discussions. The discussions' proponents shall ensure free access to, <i>inter alia</i>, the following documents<sup>3</sup>:</p> <ul style="list-style-type: none"> <li>• Notifications of the public discussion(s)</li> <li>• EIA report(s)</li> <li>• Results of the public discussions (protocols of the assemblies held, protocols of the public discussions, log of public feedback messages including all the comments and propositions made by citizens and organizations)</li> <li>• Decisions adopted</li> <li>• Information on the cancellation of the decisions adopted;</li> <li>• Information on the public ecological expertise to be held if applicable</li> <li>• Other relevant decision-making information</li> </ul> <p>All information listed above and received during the public discussions is kept by the public discussions' proponent in hard copy and/or electronically. This information shall be freely accessed by the public.</p> <p>No information on continuous disclosure during the project lifecycle is provided.</p>
<i>Manner of engagement process</i>	
<p>Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of understandable and accessible information, in a culturally appropriate format.</p>	<p>Water Code of the Republic of Belarus indicates that participation of citizens and community associations is one of the basic principles of water protection and water use.</p> <p>Forestry Code of the Republic of Belarus indicates that citizens have a right to participate in decision-making process related to use, reproduction and protection of forests via referenda or other direct democratic means.</p>
<i>Stakeholder engagement plan</i>	
<p>Stakeholders should be able to provide comments and recommendations on the draft Stakeholder Engagement Plan.</p>	<p>No Stakeholder engagement plan development is required.</p>
<i>Grievance mechanism</i>	
<p>Establish an effective grievance mechanism, inform the affected communities and ensure that the mechanism addresses concerns promptly and transparently, in a culturally appropriate manner, and is readily accessible to all stakeholders.</p>	<p>Submission of grievances is possible during the public consultation processes</p>

<sup>3</sup> The list is tailored to the needs of the current Project and is not exhaustive. The entire list is provided in Resolution of Council of Ministers of the Republic of Belarus of 14.06.2016 #458

Appendix 1 provides additional information on the following applicable standards:

- International conventions;
- EBRD's environmental and social policy (2014);
- EIB' Environmental and Social Standards (2018)
- Organisation for Economic Cooperation and Development ("OECD") Common Approaches;
- Equator Principles III requirements.

### 3. APPROACH TO STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE BY UE "MINSKVODOKANAL"

UE "Minskvodokanal" engages with the external parties interested in its activities and with consumers of its services via two major channels of communication:

1. Engagement by means of Minsk executive committee
2. Engagement by means of Minskvodokanal internal instruments

#### 3.1 External engagement by means of Minsk executive committee

In case of distribution of information regarding activities of UE "Minskvodokanal" by Minsk executive committee, the ultimate parties responsible for such information exchange typically represent the relevant divisions of city districts' administrations. In case of Zavodskoy district, within the boundaries of which the Project is being developed, officially, such responsible division is the Department for treatment of requests by citizens and legal entities. It is understood that other divisions of the Administration of Zavodskoy district are involved into engagement activities on an as-needed basis.

The following means of communication are utilized by Minsk executive committee during stakeholder engagement on UE "Minskvodokanal" matters:

- Information distribution day;
- Live phone line sessions;
- Personal meetings held in accordance with a pre-defined schedule.

Minsk executive authority has a dedicated deputy chairperson who is in charge of coordinating the activities related to UE "Minskvodokanal".

After the request related to UE "Minskvodokanal" matters is lodged to Minsk executive committee via any of the means of communication listed above, it is cascaded a responsible person in Minskvodokanal for treatment. The Company's response to the request is provided in a written form.

#### 3.2 External engagement by means of UE "Minskvodokanal" instruments

The engagement with external stakeholders by means of UE "Minskvodokanal" instruments is mainly arranged by the following structural divisions of the Company:

- Department for Organizational Affairs
- Operations Control Service
- Documentation Management Department

The following instruments are employed by UE "Minskvodokanal" to ensure timely engagement with consumers and other potential stakeholders:

- Personal meeting with the director of UE "Minskvodokanal"
- Personal meetings with heads of enterprises of UE "Minskvodokanal" (including Minsk water treatment plant)
- 'One window' service

Major functions of the divisions responsible for stakeholder engagement and consultations are provided in Figure 3.1 below.

The human resources are distributed among the three divisions as follows:

- Department for Organizational Affairs – 4 specialists
- Operations Control Service – 19 specialists involved into operation control
- Documentation management department – 5 specialists



Figure 3.1: Departments of UE "Minskvodokanal" involved into stakeholder engagement

### Department for Organizational Affairs

- Information sharing with external stakeholders
- Engagement with media representatives in accordance with quarterly arranged media plan
- Operation of the website and social media pages of Minskvodokanal (namely, Youtube and Facebook pages)
- Marketing and publicity activities of Minskvodokanal
- Conceptual arrangement of community engagement principles
- Maintaining a wide variety of public relations activities including exhibitions, seminars, presentations, demonstrations, marches
- Control over employees' conformance with business ethics principles
- Introduction of the corporate directives and policies to the employees and organization of their observation
- Treatment of requests by citizens and legal entities
- Accumulation of data for 'information sharing days'
- Study of the workers' opinions and attitudes

### Operations Control Service

- Hotline operation (24/7)
- Receipt of queries from citizens and distribution of them to the ultimate responsible party
- Management of the consumers' grievances requiring prompt resolution

### Documentation Management Department

- Management of incoming correspondence
- Primary treatment of requests by citizens and legal entities
- Primary treatment of grievances (both internal and external)
- Operation of 'Contacts and queries' website section including treatment of the queries and grievances received via e-mail

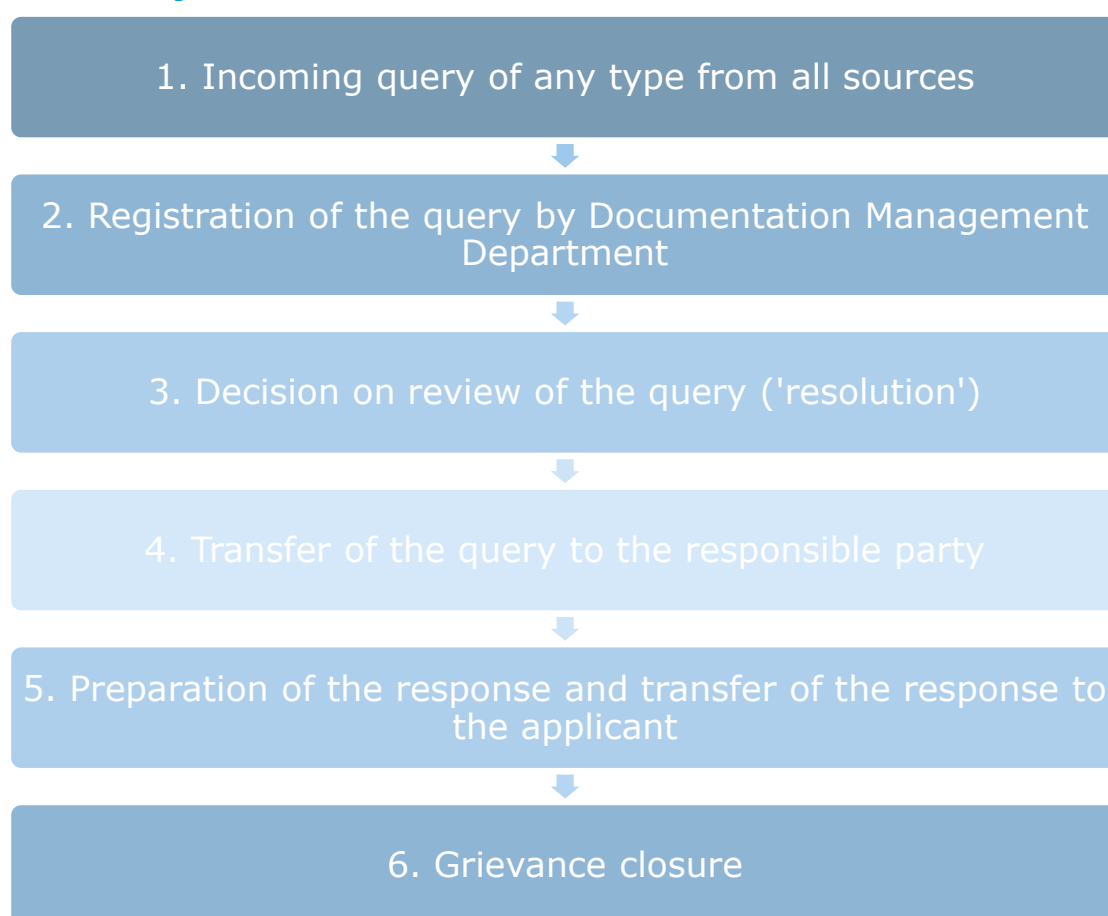
Source: UE "Minskvodokanal"

### 3.3 Grievance mechanism of Minskvodokanal

#### 3.3.1 External grievance mechanism

In the practice of queries (grievances) treatment, Minskvodokanal adheres to the provisions of the Law of the Republic of Belarus 'On queries of citizens and legal entities' (July 18<sup>th</sup>, 2011) and Resolution of the Council of Ministers of the Republic of Belarus #1786 'On approval of the order of management of documents related to queries of citizens and legal entities to state agencies, other organizations and individual entrepreneurs' (December 30<sup>th</sup>, 2012). Based on these legal acts the Company has developed its 'Instruction on documentation management in relation to queries of citizens, individual entrepreneurs and legal entities to UE "Minskvodokanal" approved on August 22<sup>nd</sup> 2014 and amended on January 25<sup>th</sup> 2016. The instruction indicates the overall order of treatment of all queries received by UE "Minskvodokanal", which is depicted in Figure 3.2 in a simplified manner.

**Figure 3.2 External grievance mechanism of Minskvodokanal**



All queries received by UE "Minskvodokanal" (including electronic queries submitted via a special form on the corporate website) are registered by UE "Minskvodokanal" at the day of the submission and inserted into a digital control system (DCS) of document management. After registration, all queries are forwarded to the director, chief engineer and/or deputy directors for approval. After the approval, the decisions on the review of the queries are generated in a form of signed and dated 'resolutions'. Once the resolution is signed, it is submitted to the register-control card within the DCS. Within a day afterwards, the queries are transferred to the responsible party defined in the resolution.

The query review period typically takes up to 15 days. This period may be prolonged depending under certain circumstances that are listed in the Instruction. If the query is not relevant to Minskvodokanal responsibilities, it is forwarded to the responsible agency within 5 days upon a receipt or are left without an answer with necessary notification of a person lodged the query.

If the query is given an interim response, it is not marked as closed within the DCS until the final resolution is provided. The query is marked as closed if:

- All issues raised within the query are considered;
- Necessary measures are taken in order to resolve the issues raised;
- The persons who submitted the query are provided with written, oral or electronic responses.

The decision on closure of the query is taken by the director, chief engineer or deputy directors.

The principle of data confidentiality is directly described by the Law of the Republic of Belarus 'On queries of citizens and legal entities'. However, the UE "Minskvodokanal" mechanisms for queries and grievances treatment do not contain a clear statement that all personal data submitted by an applicant shall be treated in a confidential manner.

### 3.3.2 Internal grievance mechanism

Relationships and communication practices between the UE "Minskvodokanal" management and its employees (including former employees) are based upon the requirements of the Labour Code of the Republic of Belarus and the Law of the Republic of Belarus #433-3 'On administrative procedures' and the Order of the President of the Republic of Belarus #200 'On administrative procedures exercised by state and other agencies in response to citizens' queries'.

Based on the aforementioned legislative acts, UE "Minskvodokanal" issued an Order #157 'On the matter of exercising the administrative procedures'. This Order regulates the administrative procedures exercised by Minskvodokanal, as well as it establishes the Provisions of operations of the 'one window' submission principle and Instruction on documentation management in relation to queries related the administrative procedures. The norms of the Order #157 are relevant to the queries submitted by the Minskvodokanal employees (including the former employees).

The overall mechanism of redress of internal grievances is similar to the mechanism used for external queries treatment. The incoming queries (grievances) are registered in a specially maintained register within the DCS by the employees in charge of administrative procedures. All queries are registered and ascribed with a tracking number at the day of their submission. If the query is submitted orally, the relevant register entry is marked as 'oral submission'. The process of the query review and resolution is reflected within the register. The query is marked as 'closed' if all issues raised within the query are considered and the applicant is provided with a written, oral or electronic response.

Additionally, the following instruments for grievance submission are available for the workers of UE "Minskvodokanal":

- Personal meeting with the enterprise's director;
- Labour disputes commission consisting of UE "Minskvodokanal" representatives and trade union representatives (in equal shares).

## 4. STAKEHOLDER ENGAGEMENT ACTIVITIES TO-DATE

The Company is disclosing Project-related information and engaging with relevant stakeholders starting from 2015. In compliance with the national requirement and applicable international standards on disclosing the Project information and maintaining a multistakeholder dialogue, the Company employs the following approaches and methods:

- Statutory consultations as part of the Belarusian EIA (OVOS);
- Consultations as part of the international ESIA process;
- Disclosure of the Project documentation via the Company's website;
- Disclosure of relevant information via media sources and other channels;
- Using the established grievance mechanism of UE "Minskvodokanal" for addressing Project grievances.

### 4.1 National EIA consultations

In November 2015, UE "Minskvodokanal" initiated the public consultations on the national EIA of the planned reconstruction of Minsk water treatment plant (the Project). A special commission was created involving the representatives of UE "Minskvodokanal", Minsk authorities and agencies. The consultations' notification was published in advance in 'Minsky kuryer' and 'Vecherny Minsk' newspapers (see Figure 4.1). Additionally, the notification was posted online on the websites of Minsk executive committee and UE "Minskvodokanal".

Figure 4.1 Notification of public consultations in 'Minsky kuryer' newspaper



Source: Excerpt from 'Minsky kuryer' newspaper, October 14<sup>th</sup>, 2015

The notification included a short description of the planned activities. Clear instructions were provided on how the public may initiate or facilitate the following:

- Submission of queries and propositions (within a 30-day period after the notification is posted);
- Public assembly for discussion of the EIA report (within a 10-day period after the notification is posted);
- Request for carrying out a public ecological appraisal.

The EIA's non-technical summary was disclosed on the website of the city administration. The EIA report was made available at the premises of Zavodskoy district administration and of UE "Minskvodokanal".

The protocol of public consultations was prepared on November 20<sup>th</sup>, 2015 and reported the absence of requests for public assemblies for discussion of the Project submitted within the 10-day period after notification was posted. No queries or propositions were submitted within the 30-day period. Due to the absence of the aforementioned, the commission for public consultations stated that it does not object to further implementation of the Project.

#### **4.2 Other consultations with communities via public meetings**

In summer 2017, UP 'Minskgrado' and authorities of Zavodskoy district of Minsk initiated public consultations on the matter of proposed development of the 'Shabany' industrial area. The consultations started on July 24<sup>th</sup> and ended on August 17<sup>th</sup>. UE "Minskvodokanal" representatives did not take part in organization of the consultations. However, since the proposal for further spatial development of the area includes the Project implementation, the results of the consultations provide valuable data on local communities' attitudes towards redevelopment of Minsk wastewater treatment plant.

UP 'Minskgrado' was in charge of this engagement activity and advertised the consultations on information boards in public places and in local media.

On July 26<sup>th</sup>, 2017, UP 'Minskgrado' and the authorities of Zavodskoy district held the presentation aimed at disclosing principle ideas of the proposed spatial development plan. The meeting was held at 'Zolak' cultural center and was attended by eight persons from Novy Dvor, including the local leader ('*starosta*'). Overall, during the consultation period 14 queries, including one collective query, were received.

Major concerns of local residents in relation to the overall plan for Shabany industrial area development were as follows:

- Unpleasant odour caused by UE "Minskvodokanal" operation and coming from local sewage pumping station;
- The issue of sludge incineration and related air pollution that may be potentially caused by the Project implementation, which is viewed especially significant for Novy Dvor residents as the settlement is 'surrounded' (as reported by local citizens during the consultations) by various industrial facilities;
- Concern on contamination of soils of lands used for subsistence farming resulted from the area development;
- EIA presented during consultations was prepared in 2012 with some statistical data dated 2007;
- The issue traffic load increased by the area development;
- Negative health impacts;
- Ash transportation;
- Scarce description of alternatives for incineration facility construction at the UE "Minskvodokanal" water treatment plant;
- Necessity for ensuring a green buffer zone between residential areas and the proposed development;
- Potential transformation of agricultural lands (between Novy Dvor and UE "Minskvodokanal" facilities) into industrial lands (this concern was signed by 91 residents of Novodvorsky rural council).

All queries were provided with written responses.

On September 1<sup>st</sup>, 2017, the Council for Architecture and Urban Planning of Minsk executive committee issued the protocol summarizing the aftermath of the public consultation process. The protocol reports that the grievances received during the consultation process do not present proof of law violation caused by the proposed development and shall not prevent the development plan from implementation.

### 4.3 Information disclosure via media and other channels

As mentioned in Figure 3.1, the Department for organizational affairs is in charge of communication with media sources. The series of activities related to disseminating information related to UE "Minskvodokanal" practices in general and Project in particular include the following:

1. Engagement with printed media, electronic media, TV and radio on a variety of topics including dissemination of up-to-date information on job opportunities and reconstruction of Minsk waste water treatment plant (selected media entries are re-posted on <https://www.minskvodokanal.by/press/mass-media/>).
2. Information disclosure via the corporate website ([www.minskvodokanal.by/](http://www.minskvodokanal.by/)), which was substantially updated in June 2016 and is now well accessible from all types of gadgets including mobile phones. The website also allows access for the blind and visually impaired. The website contains UE "Minskvodokanal" contact information, as well as grievance/queries' forms and information on time slots for personal meetings. UE "Minskvodokanal" also maintains its Facebook and YouTube pages.
3. Information disclosure via cash processing centres where the stands are placed in order to publish up-to-date data on UE "Minskvodokanal" activities.
4. Disclosure of the Project ESIA package via the following link: <https://minskvodokanal.by/reconstruction-mos/dokumentyi> (since 2018 and going forward for the lifetime of the Project).

Links to media entries about the Project and the MWWTP are provided in Appendix 2.

### 4.4 ESIA consultations

International consultancy "Ramboll" was assigned to undertake ESIA to international standards. Consultations were held during the ESIA preparation (November 2017 – April 2018) and upon disclosure of the ESIA Report and associated documentation (April-August 2018). Table 4.1 below summarises the ESIA consultation process.

**Table 4.1: ESIA stakeholder consultations**

Event	Participants	Topics
A meeting with the representatives of Minskgrado and administration of Zavodskoy district of the City of Minsk	<ul style="list-style-type: none"> <li>• Natalya Gurkova-Maslova (Representative of the Committee of architecture and urban planning of Minsk executive committee)</li> <li>• Marina Pivovarchik (Head of the Department of Architecture of the Directorate of Architecture and Construction of Zavodskoy district)</li> <li>• Mikhail Drushchits (Representative of Minskgrado)</li> </ul>	<ul style="list-style-type: none"> <li>• Spatial development of Shabany industrial urban area</li> <li>• Major issues faced by the urban planners during the Shabany masterplan preparation</li> <li>• Development of the Special Economic Zone 'Minsk'</li> <li>• Public hearings and presentation of the project for extension of the Shabany industrial urban area towards the nearby rural areas and rural settlements</li> <li>• Major grievances raised by local communities including Shabany-1 and Shabany-2 neighbourhoods and local rural settlements' residents</li> <li>• Major concerns of local residents in relation to UE "Minskvodokanal" activities and other industrial practices in the area</li> </ul>
A meeting with Novodvorsky rural council	Head of Novodvorsky rural council Mr. Nikolay Maksimchikov	Topics on socio-economic development of local rural communities:

		<ul style="list-style-type: none"> <li>• Demographic structure of local communities;</li> <li>• Social infrastructure capacity;</li> <li>• Economy of Novodvorsky rural council;</li> <li>• Local residents' demand for upgraded housing;</li> <li>• The issue of three houses/buildings located on the territory of former Shabany village that are, reportedly, used as summer houses.</li> </ul>
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#### 4.5 Relevant communication with stakeholders via established grievance mechanism of UE "Minskvodokanal"

The Company's external grievance mechanism is used to identify and address stakeholders' concerns. EU "Minskvodokanal" receives continuous complaints from the local communities adjacent to the Volma sludge ponds site (v. Sinilo, v. Serafimova, v. Mikhanovich, v. Veselki, v. Lysovschina) on the odour and operations of the Volma site. All sludge generated at the MWWTP is transported and disposed at the ponds. All complaints are considered in compliance with the established procedure and measures have been taken / will be taken to reduce the adverse impact of the sludge ponds (plantings of green spaces, trial deodorization of the site, sheltering of the vehicles transporting dehydrated sludge to the ponds). Few comments were received in respect of the sludge treatment processes to be selected for the Project. The Company provided clarifications on the feasibility of the proposed solutions and further investigations of the issue.

#### 4.6 Supplementary ESIA consultation period for Minskvodokanal project (16.04.2018 – 14.08.2018)

The 120-day period of consultation activities for the Supplementary ESIA started on 16<sup>th</sup> of April 2018 following the disclosure of the following documents:

- Supplementary ESIA Report;
- Non-technical summary (NTS);
- Stakeholder engagement plan (SEP);
- Environmental and Social Action Plan (ESAP).

The documents were disclosed at a variety of venues as recommended by previous iterations of the SEP and were made available electronically via the following link:

<https://minskvodokanal.by/reconstruction-mos/dokumentyi>, and proper notifications were ensured by media, street adverts and personal communication (in case of the most affected communities).

On 24<sup>th</sup> of May 2018 a public meeting was held aimed at discussion of the documents disclosed. In total, 54 participants were registered including the following:

- Representatives of Minskvodokanal;
- Representatives of the elected officials of Novodvorsky rural council, the City of Minsk and Belarus;
- Residents of Zavodskoy district of Minsk, Novodvorsky rural council and the former village of Shabany;
- Representatives of a variety of other governmental and non-governmental organizations and enterprises.

During the meeting the results of the ESIA were presented. Some of the stakeholders involved into the meeting, including the elected representative of the Belarusian parliament, demonstrated their positive attitude towards the Supplementary ESIA contents and results. Major concerns raised by local public related to the Project design and alternatives, including:

- Duration of the Project;
- A range of alternative options for utilization of the sediments resulting from the water processing activities;
- Opportunities for Project costs reduction;
- Potential air impacts triggered by the Project.

The concerns raised were responded to by the representatives of Minskvodokanal, Ramboll and Minskgrado.

During the consultation period, a total number of 3 suggestions or propositions were lodged by the stakeholders. They are described in more details below.

*Collective request (24.07.2018)*

The request was issued by the residents of Novodvorsky rural council and addresses the issues of the overall spatial development plan of Special Economic Zone 'Minsk' (Parcel 1 'MSA'). The plan includes a variety of additional developments, one of which is the Project. Additionally, the residents requested to consider the alternative of the Project allowing for use of the MVK-produced sediment in agricultural activities. The proposition was signed by over 400 residents. The request was responded by Minskvodokanal elaborating on the positive aspects which the Project will ensure in regard to environmental impacts. MVK re-confirmed its position on the use of sediment in the agricultural sector stating that the sediment's characteristics do not allow its safe use in food production industry.

*Collective request (04.08.2018)*

The request was issued by the residents of Novodvorsky rural council addressing the cumulative impacts of the wide range of sources, including waste management facilities, tannery, etc. The residents also required to clarify the area of sediments and other "toxic" (the term in the request) goods placement, as well as to ensure that only the part of Project that is safe to environment is to be implemented. The request was signed by over 240 persons. The request was responded to by Minskvodokanal (with assistance from Ramboll) stipulating the generally positive environmental and social effect of the Project. Minskvodokanal specifically emphasized that the zero-alternative is considered as one of the negative options and should be avoided. Additional measures that may be provided to ensure environmental safety of the Project are listed in the response.

The request response was prepared jointly by Ramboll and EBRD supported by the letter signed by the Head of EBRD Minsk office, who stipulated that EBRD and Minskvodokanal will ensure implementation of specific actions providing for compliance with national and international environmental and social standards. The implementation of the actions shall be guaranteed by the loan agreement for Minskvodokanal.

*Personal request (06.07.2018)*

In a personal written request, one individual insisted on additional consideration of the Project alternatives; specifically, it was requested to make a further research on the possibility of the MVK-produced sediment as a fuel for cement industry. Minskvodokanal specialists responded to the request with additional expertise from the Ministry of Architecture and Construction of the Republic of Belarus. The general conclusion provided by Minskvodokanal indicates the economic insufficiency of the use of sediment in cement industry proposed in the request.

*Conclusion*

Based on the above, it is concluded that all requests made by the public were responded within the allotted timeframes as stipulated by SEP and internal grievance management procedures of MVK. The process of public consultation for the Supplementary ESIA may be considered as completed, and the objectives of the process are accomplished. Nevertheless, Minskvodokanal will continue actively engaging with the interested parties in line with the provisions of SEP.



#### 4.7 Consultations during Project identification

Upon completion of the ESIA process, the Project preparation phase has ended. The Project is currently undergoing a review of the sludge management solutions based on the best international practice, including in particular compliance with EU best available techniques for sludge disposal installations, by international technical consultants. Should a new process solution be selected by the ongoing studies, a new impact assessment and additional consultations will be required. In this case, the Project SEP will be updated before the design phase. Stakeholders engagement activities at the Project definition phase in 2019 are summarised in **Table 4.2**.

**Table 4.2: Stakeholder engagement at the Project Identification phase**

Event	Period	Participants	Topics
Air quality monitoring and reporting	Quarterly	<ul style="list-style-type: none"> <li>Centre for Hygiene and Epidemiology of the city of Minsk</li> <li>Centre for Hygiene and Epidemiology of the Zavodskoy district of Minsk</li> <li>Committee for Natural Resources and Environmental Protection of the city of Minsk</li> </ul>	<ul style="list-style-type: none"> <li>Air quality at the boundary of the MWWTP Sanitary Protection Zone (SPZ)</li> <li>Air quality at the boundary of the sludge ponds site Sanitary Protection Zone (SPZ)</li> </ul>
Meeting with the local communities in the Privolny community centre	28.03.2019	UE "Minskvodokanal": <ul style="list-style-type: none"> <li>Deputy Head of the Wastewater Treatment Division</li> <li>Engineer of the Environment and Development Division</li> </ul> Local community members	Operation of the Volma sludge ponds by UE "Minskvodokanal" and associated community impact
Meeting at the RB Ministry of Health	04.04.2019	RB Ministry of Health UE "Minskvodokanal": <ul style="list-style-type: none"> <li>Head of the Wastewater Treatment Division</li> <li>Head of the Environment and Development Division</li> </ul>	Addressing community grievances on odor emissions of the Volma sludge ponds operated by UE "Minskvodokanal"
Round table	24.07.2019	RSRUE "Bel SRC "Environment" UE "Minskvodokanal": <ul style="list-style-type: none"> <li>PIU Deputy Head</li> <li>Head of the Environment and Development Division</li> </ul>	Addressing community grievances associated with the operation of the Volma sludge ponds in the vicinity of Sinilo village
Meeting with the local communities in the Lugoslobodsky community centre	07.09.2019	UE "Minskvodokanal": <ul style="list-style-type: none"> <li>Head of the Wastewater Treatment Division</li> <li>Head of the Environment and Development Division</li> </ul> Local community members	Operation of the Volma sludge ponds by UE "Minskvodokanal" and associated community impact
Meeting at RSRUE "Bel SRC "Environment"	01.10.2019	RSRUE "Bel SRC "Environment" UE "Minskvodokanal": <ul style="list-style-type: none"> <li>Head of the Wastewater Treatment Division</li> <li>Head of the Chemical and Bacteriological Laboratory of the Wastewater Treatment Division</li> </ul>	Addressing community grievances associated with the operation of the Volma sludge ponds by UE "Minskvodokanal"

## 5. STAKEHOLDER IDENTIFICATION AND ENGAGEMENT METHODS

### 5.1 Definitions and overview

**Stakeholders**<sup>4</sup> are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

### 5.2 Stakeholder groups and interested parties

Identification of key stakeholders is a vital part of the ESIA process required to understand the groups that have been or will be affected by the Project. For the purposes of effective and Project-tailored engagement, two key categories of the Project stakeholders have been identified:

- *Affected Parties*

This category includes individuals, groups and organisations within the anticipated Project Area of Influence that are directly affected, either actually or potentially, by the Project and/or have been identified as most susceptible to changes associated with the Project.

This category involves the following groups of Project stakeholders: (i) affected land users and Svisloch River users, (ii) affected rural communities (of Novodvorsky rural council, communities living in Zavodskoy district of Minsk, communities in the vicinity to the Volma sludge ponds site), (iii) residents, businesses and organisations in the city of Minsk, (iv) workers of the Project contractors and subcontractors and (v) UE “Minskvodokanal” workers.

- *Interested Parties*

Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and/or who could influence the Project and the process of its implementation in an indirect way, are included into this category.

This category includes the following groups of Project stakeholders (i) national and regional government authorities and regulators and elected officials, (ii) representative bodies and local self-government bodies, (iii) International Financial Institutions (IFIs), (iv) national financial organisations, (v) consultants, (vi) workers’ organisations, (vii) Project contractors, subcontractors and suppliers, (viii) civil society and non-governmental organisations, (ix) press and mass media and (x) educational institutions.

More details on stakeholder groups are provided in Appendix 3.

### 5.3 Engagement methods

Different stakeholders require different approaches and methods in engagement. The proposed methods for stakeholder engagement activities are outlined in Figure 5.1.

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<sup>4</sup> International Financial Corporation (IFC), Stakeholder Engagement Handbook, 2007

**Figure 5.1: Proposed methods for stakeholder engagement during Project identification**

Information repositories	<ul style="list-style-type: none"> <li>•Tools: Use of publicly available buildings and venues in the Company</li> <li>•Objectives: Reaching the workers of the Company and contractors with the Project-related information</li> </ul>
Printed public information materials	<ul style="list-style-type: none"> <li>•Tools: Factsheets and brochures/leaflets</li> <li>•Objectives: Delivery of Project-related crucial information</li> </ul>
Media (TV, newspapers, e-media)	<ul style="list-style-type: none"> <li>•Tools: Entries, advertisements, press releases, interviews</li> <li>•Objectives: Reaching broader public with Project-related information</li> </ul>
Central and technical information contact	<ul style="list-style-type: none"> <li>•Tools: Talks in person with those interested in instant and deeper response regarding Project activities (crucial stakeholders only)</li> <li>•Objectives: Project-communities information exchange</li> </ul>
UE "Minskvodokanal" website	<ul style="list-style-type: none"> <li>•Tools: Regular updates on the Project progress and engagement activities</li> <li>•Objectives: Instant delivery of Project-related crucial information</li> </ul>
Feedback forms	<ul style="list-style-type: none"> <li>•Tools: Forms attached into Project-related materials to be placed in information repositories/centers or filled in on the website</li> <li>•Objectives: Receiving stakeholders' feedback</li> </ul>
General/Face-to-face meetings	<ul style="list-style-type: none"> <li>•Tools: If required, personal meetings with local stakeholders will be held by the Company</li> <li>•Objectives: Project-communities information exchange</li> </ul>
Site tours	<ul style="list-style-type: none"> <li>•Tools: If required, the Company will arrange site tours to the MWWTP for mass media, school students</li> <li>•Objectives: Raising awareness of modern processes and operations of the MWWTP</li> </ul>

Source: UE "Minskvodokanal"

The responsibilities for delivery of each type of methods are shared between divisions in the Company based on the current stakeholder engagement approach taken by UE "Minskvodokanal".

**Table 5.1** summarises the key stakeholder groups and proposed engagement methods.

If you are a stakeholder who has not been identified in the table below but would like to be kept informed about the Company and Project, please contact us using contact information as specified in the Section 1.1.

[illegible]

[illegible]

– EIB			x	x	x								x									x
• National financial organisations:																						
– OJSC Belarussian Bank for Development and Reconstruction "Belinvestbank"		x		x	x								x									x
• Consultants:																						
– PIU consultant																						
– CDP consultant																						
– Supervision consultant (FIDIC Engineer)		x		x	x						x		x	x								
– Legal consultant																						
• Workers organisations:																						
– Primary TU organisation of UE "Minskvodokanal" under the Belarussian Trade Union for Local Industries and Utilities													x						x			
• Project contractors, subcontractors and suppliers (procurement)																						
– Businesses and organisations in the city of Minsk		x				x											x					x
– Businesses and organisations in Belarus		x				x											x					x
– International businesses and organisations		x				x											x					x
• Civil society and non-governmental organisations																						
– Belarusian Women Union		x				x	x	x														
• Press and mass media																						
– Newspapers ("Vecherny Minsk", "Minsky Curyer", "Blizkiye Novosti", "Narodnaya volya", "Komsomolskaya Pravda" (Belarusian edition), "Respublica", "Zvezda")		x				x								x							x	
– Press agencies ("Minsk-Novosti")		x				x								x							x	
– Radio (Radio-Minsk, Minskaya Volna, Russkoye radio, Minsk, Stolitsa, Alfa-radio, Radio Mi)		x				x								x							x	
– TV channels (STV, Minsk TV, ONT, Belarus-1)		x				x								x							x	

<ul style="list-style-type: none"> <li>– Internet resources (city information site "Minsk-novosti" <a href="http://www.minsknews.by">www.minsknews.by</a>, web-page <a href="http://blizko.by/regions/shabany">http://blizko.by/regions/shabany</a>, website of "Narodnaya volya" newspaper, news website TUT.by)</li> </ul>		x				x								x							x	
<ul style="list-style-type: none"> <li>• Higher and secondary education institutions:               <ul style="list-style-type: none"> <li>– Belarusian national technical university</li> <li>– Belarusian state technological university</li> <li>– Minsk state college for architecture and construction</li> </ul> </li> </ul>		x		x		x	x				x			x								

## 6. ENGAGEMENT PLAN

### 6.1 Overview

The stakeholder engagement activities serve two key purposes:

- Disclosing appropriate information about the Project. Disclosure of relevant Project information helps stakeholders understand the risks, impacts and opportunities of the Project and minimises potential issues and risks.
- Providing relevant stakeholders with the opportunity to voice their opinions, preferences and grievances – This enables participation and involvement in the planning and design process and the enhancement of proposed impact mitigation measures.

The various engagement and disclosure activities to be undertaken for the Project are based on principles of inclusion and continuity as well as comply with the applicable EBRD and EIB requirements and national law.

### 6.2 Consultation and disclosure action plan

Previous stakeholder consultations during and after the ESIA process are described in Sections 4.6 and 4.7. The Company takes a broader approach to information disclosure and public engagement and will follow this principle through the Project lifecycle.

The mandatory COVID-19 pandemic restrictions have been taken into account and alternate plans for stakeholder engagement and disclosure have been included in the engagement programme in line with the EBRD briefing note on stakeholder engagement in COVID-19<sup>5</sup> to substitute some traditional consultation and disclosure approaches and promote meaningful and continuous stakeholder engagement during travel and social distancing restrictions, restrictions on public assembly introduced by the Government of Belarus and/or recommended by the World Health Organisation. As soon as restrictions are lifted, the Project will revert to traditional methods of engagement as described in Section 5.3 above. Alternate approaches for engagement with the ACs include disclosing information to affected stakeholders by means of mobile connectivity<sup>6</sup> including messaging, on-line feedback forms, conventional mass media, online services, teleconferences for meetings and round tables with the Project stakeholders as well as online questionnaires for feedback and opinions sharing.

The detailed Consultation and Disclosure Action Plan providing specifics of such approach for the Project lifecycle is included in Annex 7.

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<sup>5</sup> EBRD briefing note: Stakeholder engagement (PR10) in Covid-19, <https://www.ebrd.com/covid19-consultation.pdf>

<sup>6</sup> According to RB Ministry of Communications and Information the mobile services penetration in Belarus stood over 99.9% in 2019.



## 7. GRIEVANCE MANAGEMENT AND REDRESS

### 7.1 Key principles

EBRD, EIB, Equator Principles, OECD Common Approaches and other similar international standards require the establishment and maintenance of a grievance mechanism open to all stakeholders. This mechanism has been established as of early stages of the Project and will be maintained throughout the Project lifecycle.

The grievance mechanism is meant to providing a fair and prompt registration and redress system for any complaint linked to the Project. One of its key objectives is to avoid resorting to the judiciary and to seek amicable resolution in as many situations as possible, thereby safeguarding both complainants' and Company's interest and limiting risks unavoidably associated to legal action.

### 7.2 External grievances

As indicated in Section 3.3 above, UE "Minskvodokanal" has an elaborate and well-functioning external grievance mechanism. It is proposed that the Project activities will employ the existing mechanism to the extent possible. The grievance form is included in Appendix 4.

Additionally, UE "Minskvodokanal" makes arrangements to place grievance forms and a grievance box at the MWWTP administrative building (Inzhenernaya str, 1, Minsk). Any aggrieved individual is free to write a complaint in any format and retain anonymity if so requested. It is however important to specify an address that can be used by the Company to send a reply to, and the grievance form presented in Appendix 4 shall be preferred. The grievances received via such grievance boxes will be treated in line with the corporate external grievance mechanism.

### 7.3 Internal grievances

As indicated in Section 3.3, the internal grievance mechanism is developed by the Company addressing the issues related to UE "Minskvodokanal" workers. UE "Minskvodokanal" will ensure that contractors' and subcontractors' workers have an opportunity to lodge their grievances, too. This will be achieved via installing grievance boxes aimed at collecting Project construction personnel grievances and comments/propositions. Such boxes will be installed in the buildings where workers may gather, including the WWTP office, canteens (if used), construction camps (if used), etc. The boxes should be placed in a manner to ensure privacy of grievance placement. The grievance form for internal stakeholders is presented in Appendix 5 and will be located in the areas close to the grievance boxes. Grievances received by the Company or contractor in any other form will be also considered. The grievances of contractors' workers received via the grievance boxes will be collected by UE "Minskvodokanal" regularly and treated/analysed by responsible parties of the Company in line with the corporate internal grievance mechanism. After the grievance is analysed and a decision is made upon the potential resolution, the Company will require the relevant contractor to resolve the grievance.

### 7.4 Grievance monitoring and reporting

The Company conducts constant grievances analysis, monitoring and reporting via the automated DCS of document management. The grievance statistics may be retrieved from the system at any time. The reporting includes the following indicators:

- Number of all received queries and grievances opened in the quarter;
- Form of grievances (oral, written and electronic);
- Comparison of the queries and grievances statistics against the previous year numbers;
- Categorisation of the queries and grievances.

## **8. MONITORING AND REPORTING FOR STAKEHOLDER ENGAGEMENT**

The following indicators are used to monitor and assess the efficiency of the stakeholder engagement activities:

- Number of meetings of various kinds (general community meetings, face-to-face meetings with local leaders, etc.) held with each category of stakeholders and number of participants;
- Number and nature of suggestions and recommendations on Project activities received by the Company using various feedback mechanisms;
- Number and nature of publications covering the Project in the local, regional and national mass media;
- Grievances statistics.

The indicators statistics are gathered on a yearly basis.

This SEP will be updated on a yearly basis during the early works and construction phases, and every two years during operations.

## 9. IMPLEMENTATION AND RESOURCES

Antonov Kirill Victorovich, the PIU Deputy Head for Technical Issues of UE “Minskvodokanal”, has been appointed to act as the Project Community Liaison Officer (CLO). The Project CLO will interact with other divisions in the Company having stakeholder engagement responsibilities (see Section 3 for details), including the Public Relations Department in planning mass media publications, meetings with CSOs and NGOs and other stakeholders. The Project CLO’s contact details are provided in Section 1.1.

Liaison with internal stakeholders (i.e. Project workforce) will be held by the representatives of HR department of UE “Minskvodokanal”.

## **APPENDIX 1. APPLICABLE INTERNATIONAL STANDARDS**

## International conventions

Public consultation is regulated by two international conventions:

- Convention of the UN European Economic Commission ("UNECE"), "On Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters" – usually referred to as the "Aarhus Convention" (1998);
- UNECE Convention "On Environmental Impact Assessment in a Transboundary Context" – usually referred to as the "Espoo Convention" (1991).

The objective of the Aarhus Convention is to guarantee the right of the public for information, to facilitate public participation in the decision-making process and to provide access to justice in environmental matters. It sets out two basic principles related to disclosure of information on environmental issues:

- State authorities should disclose environmental information on request and on a non-discriminatory basis;
- Environmental information should be disclosed proactively to any affected party.

The public concerned should be timely and intelligibly informed at the very start of the decision-making process on the following:

- The intended activity and the application under review;
- Decision options and the draft resolution;
- State authority which is responsible for making the decision;
- Established procedure (the beginning of the procedure, forms of possible participation, time and venue of the scheduled public hearings, the state authority which can provide the information, availability of environmental information, the scope of the intended activity, procedure of environmental impact assessment, including by whom and when such information may be provided).

## EBRD's environmental and social policy

EBRD's Environmental and Social Policy (2014) includes Performance Requirement 10 on "Information Disclosure and Stakeholder Engagement", which requires the following:

- Identify people or communities that are affected or likely to be affected (directly or indirectly) by the project (affected parties) including individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement, or may have an interest in the project (other interested parties);
- Ensure that such stakeholders are appropriately engaged in environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation; and
- Maintain a constructive relationship with stakeholders, including affected communities, on an ongoing basis through meaningful engagement during project implementation.

PR 10 identifies that stakeholder engagement involves six key elements: (i) stakeholder identification and analysis, (ii) stakeholder engagement planning, (iii) disclosure of information, (iv) meaningful consultation, (v) implementation of a grievance mechanism, and (vi) ongoing reporting to relevant stakeholders.

PR 10 requires that during project preparation stakeholders be identified and analysed and that a Stakeholder Engagement Plan be prepared. Resources and materials for public disclosure and engagement should focus on project 'affected parties', with particular attention to disadvantaged or vulnerable groups and individuals. Engagement should continue through project implementation and a grievance procedure be established to receive and respond to stakeholder complaints.

PR 10 states that stakeholder engagement should:

- Be based on disclosure of relevant and adequate information, including draft documents and plans, to allow comment prior to decisions being taken;
- Begin early in the ESIA process;
- Focus on social and environmental risks and adverse impacts, and proposed measures and actions to address these; and
- Be carried out on an on-going basis as issues, impacts and opportunities evolve.

In addition, the EBRD does not finance the projects that are not in compliance with national law or international commitments of the project host country under respective treaties, conventions or agreements.

### **EIB Environmental and Social Standards**

EIB Environmental and Social Standards (2018) include Standard 10 "Stakeholder Engagement". ESS10 affirms the EIB's expectation that project initiators uphold an open, transparent and accountable dialogue with all relevant stakeholders at the local level.

All EIB-financed projects shall adhere to principles of public participation, non-discrimination and transparency in decision-making. Project ESIA undertakings should follow the spirit of the Aarhus Convention, 1992 Rio Declaration on Environment and Development and 2002 Johannesburg Declaration on Sustainable Development which recall the right to access to information and public participation within the context of sustainable development.

ESS10 defines stakeholder engagement as a free, prior and informed process that involves seven key components: (i) stakeholder analysis, (ii) engagement planning, (iii) timely disclosure and dissemination of/access to information, (iv) public consultations, (v) obtaining free, prior and informed consent, (vi) grievance mechanism and (vii) monitoring and reporting.

Similar to EBRD PR10, EIB ESS10 sets forth the following overarching requirements to effective and meaningful engagement and consultation:

- Stakeholder engagement is to be planned for and carried out without discrimination, taking into account differences in risk exposure and the increased sensitivity and reduced resilience of vulnerable groups and be targeted at attaining a broad community support and long-term sustainable development
- Stakeholders' participation, inputs and involvement are to be documented and carefully considered throughout all project phases
- Factors such as literacy, unequal gender relations and access to dissemination media constitute factors to be carefully considered when pursuing an effective disclosure and information dissemination campaign
- Effective and meaningful engagement and consultation shall be initiated early in the process of identification of environmental and social risks and potential adverse impacts and continue throughout the project life cycle promoting inclusion of the affected communities, and accessibility to any vulnerable groups as well as inclusion, beyond the affected parties, of any groups or individuals who have been identified as other interested parties.

### **OECD common approaches**

The latest version of the '*Recommendation of the Council on Common Approaches for officially supported export credits and environmental and social due diligence (the "Common Approaches")*' was adopted in April 2016. It presents the common approaches to environmental and social issues taken, amongst others, by Export Credit Agencies ("ECAs") of OECD member countries. It categorises projects along similar guidelines as those adopted by the IFC and requires ECAs and other similar finance institutions to benchmark all projects they review for

potential finance against the World Bank Environmental and Social Standards, or the IFC's Performance Standards.

In practice ECAs of OECD countries apply IFC's Performance Standards to private sector projects they consider for finance or insurance.

### **Equator Principles III requirements**

Equator Principles III ("EPIII") requirements applicable to public engagement are essentially contained in Principles 5 (Stakeholder Engagement), 6 (Grievance Management) and 10 (Reporting and Transparency), and in IFC Performance Standards 1 and 7 (2012), to which the EPIII make an explicit reference. Public involvement is to be considered an essential part of any business venture and a way to improve project quality and delivery.

Equator Principles requirements concerning public consultation are similar to IFC requirements.

## **APPENDIX 2. LINKS TO THE MASS MEDIA ENTRIES OF THE PROJECT AND MWWTP**



Starting from 2015, the following media entries were published detailing the implementation of the Project and the overall issues of Minsk wastewater treatment plant:

- City spotlight portal "Minsk News Agency": "Reconstruction works at the Minsk Wastewater Treatment Plant shall be completed in 2025", report of 04.07.2020 (available at <https://minskvodokanal.by/press/mass-media/minsk-novosti.-raboty-i-po-rekonstrukcii-minskoj-ochistnoj-stanczii-dolznyi-zavershitsya-v-2025-m/>);
- Editorial and publishing house "SB. Belarus Today": "Director of UE "Minskvodokanal" explains when the reconstruction of the Minsk Wastewater Treatment Plant will start", report of 24.02.2020 (available at <https://minskvodokanal.by/press/mass-media/sb.-belarus-segodnya.-rukovoditel-up-«minskvodokanal»-obyasnil,-pochemu-peresmotrel-i-normyi-potrebleniya-vodyi,-i-rasskazal,-gde-samaya-chistaya-voda-v-stoliche/>);
- "Belarus 1" TV channel: "New approaches to wastewater disposal are being discussed at the international level", report of 12.02.2020 (available at <https://minskvodokanal.by/press/mass-media/belarus-1.-novyye-podxodyi-v-vodootvedenii/>);
- Editorial and publishing house "SB. Belarus Today": "100% wastewater in Minsk is treated", article of 12.02.2020 (available at <https://www.sb.by/articles/direktor-up-minskvodokanal-100-stochnykh-vod-v-minske-otpravlyayutsya-na-ochistku.html>);
- Online news outlet of Belarus "Onliner": "Minskvodokanal" will deodorize its sludge ponds. A questionnaire on tastes and fragrance", article of 30.01.2020 (available at <https://realt.onliner.by/2020/01/30/minskvodokanal-5>);
- City spotlight portal "Minsk News Agency": "Minsk has no issues with drinking water – Director of UE "Minskvodokanal", report of 23.08.2019 (available at <https://minskvodokanal.by/press/mass-media/minsk-novosti.-v-minske-net-problem-s-pitevoj-vodoj/>);
- "Belarus 1" TV channel: programme "Perspective", "Collaboration between Belarus and EBRD. MWWTP reconstruction", report of 04.03.2019 (available at <https://minskvodokanal.by/press/mass-media/sotrudnichestvo-belarusi-i-ebrr.-rekonstrukciya-mos/>);
- Magazine "Water Supply and Sanitation" No.2: статья «Дело, которому мы служим» of 28.02.2019 (доступен по адресу <http://www.vstmag.ru/ru/archives-all/2019/2019-2>);
- TV Channel "ONT": "Historical moment – the European Investment Bank invests in Belarus. What will the first multimillion tranche target at?" report of 21.11.2018 (available at <https://minskvodokanal.by/press/mass-media/ont-istoricheskij-moment/>);
- Newspaper "Belnovosti": "EBRD and EIB provided 168 million Euro for the upgrading of "Minskvodokanal", article of 21.11.2018 (available at <https://minskvodokanal.by/press/mass-media/smi-o-nas-ebrr-i-eib-vyidelili-168-millionov-evro-dlya-modernizacii-minskvodokanala/>);
- Minsk City Executive Committee: "A meeting with business circles of France" article of 26.10.2018 (available at <https://minskvodokanal.by/press/mass-media/vstrecha-s-delovymi-krugami-franczii/>);
- Belarus Telegraph Agency: "Minsk offers collaboration to French companies", article of 26.10.2018 (available at <https://minskvodokanal.by/press/mass-media/minsk-predlagaet-francuzskim-kompaniyam-sotrudnichestvo/>);
- Online news outlet of Belarus "Onliner": article of 24.08.2018 (available at <https://realt.onliner.by/2018/08/24/sos>);
- Newspaper "Minsky kuryer": "At the limit of its capacity" article published on 18.06.2017 (available at <http://mk.by/2017/06/28/165206/>);
- Newspaper "Respublika": "On treatment campaign", article published on July 21.07.2017 (available at <https://www.sb.by/articles/ot-vsey-ochistnoy-kompanii.html>);
- TV Channel "Stolichnoye televidenie": "Environmental and efficient", report published on July 10.07.2017 (available at <https://www.minskvodokanal.by/press/mass-media/ctv-ekologichno-i-ekonomichno/>);
- Website TUT.by: "Reason for Minsk water treatment upgrade worth 150 million euro", article posted on 28.06.2017 (available at <https://news.tut.by/society/549189.html>);

- TV Channel "Stolichnoye televidenie": "Integrated reconstruction of the Minsk Wastewater Treatment Plant", report of 22.07.2016 (available at <https://www.minskvodokanal.by/press/mass-media/stv-kompleksnaya-rekonstrukciya-minskoj-ochistnoj-stanczii/>);
- Newspaper "Minsky kuryer": "Business Monday", article of UE "Minskvodokanal" development outlook and MWWTP reconstruction of 19.06.2016 (available at <https://www.minskvodokanal.by/press/mass-media/stv-kompleksnaya-rekonstrukciya-minskoj-ochistnoj-stanczii/>);
- Newspaper "Minsky kuryer": "Towards Clean Water", article detailing MWWTP reconstruction programme of 23.10.2015 (available at <https://www.minskvodokanal.by/press/mass-media/minskij-kurer-na-chistuyu-vodu/>).

**APPENDIX 3. IDENTIFIED GROUPS OF PROJECT STAKEHOLDERS**

## Affected Parties

### Affected land users and Svisloch River users

Land users, whose activities may be potentially affected by the Project, are viewed as stakeholders of the Project. The following land and Svisloch River users are considered as the parties potentially affected by the Project:

- Users of the three houses on the territory of the former Shabany village to the North-West of the Minskvodokanal site potentially involved into subsistence or supplementary farming activities
- Agricultural businesses located in Novodvorsky rural council (in Novy Dvor agro-town)
- Recreational anglers involved into fishing activities at Svisloch River according to anecdotal information received by Ramboll during the site visit

### Affected rural communities in the Project area of influence

Within the territory of Minsky district, the following rural communities are expected to be potential direct recipients of the Project impacts:

- Communities residing in Novy Dvor agro-town
- Communities residing in Podlosye village

The authorities in charge of administration of these communities, as well as any elected officials (e.g. the elders (*starosta*)), shall also be considered as key stakeholders of the Project. It should be noted that the residents of Novodvorsky rural council expressed their worries and, at times, resentment towards the broader development of the Shabany industrial area, which includes the Project. More details on the past consultations with local communities, which discovered such attitude to development activities in the area are discussed in the dedicated section of this chapter.

The following communities in the immediate vicinity to the Volma sludge ponds are included in this group of Project stakeholders:

- Aseevka village;
- Vankovschina village;
- Vesiolki village;
- Gatovo village;
- Dachny settlement;
- Dubki settlement;
- Efimovo village;
- Lebedinets village;
- Leshnitsa village;
- Lysovschina village;
- Matsevichi village;
- Mikhanovichichi village;
- Privolny village;
- Polesije settlement
- Sinilo village;
- Serafimovo village;
- Staiki settlement;
- Siniki village
- Felitsianovo village;
- Tsesino settlement.

These communities regularly complain on the unpleasant odour emissions and are interested in the MWWTP upgrading plans and subsequent decommissioning of the Volma sludge ponds.

### Residents, businesses and organisations in the city of Minsk

It is understood that the Project may potentially have an impact on the major part of Minsk population since roughly 95% of the Belarusian capital's residents are consumers of UE "Minskvodokanal" services. However, it is expected that a direct impact of the Project construction phase is likely to concentrate on the following stakeholders that are viewed as key to the Project:

- Residents of Shabany neighbourhood
- Businesses located on the territory of Shabany residential neighbourhood
- Businesses located on the territory of 'Minsk' Free Economic Zone

The authorities, agencies and elected officials of Zavodskoy district of Minsk shall be treated as key stakeholders of the Project.

### **Workers of the Project contractors and sub-contractors**

It is anticipated that UE "Minskvodokanal" will invite contractors to perform the construction activities of the Project. The workers of the Project contractors and subcontractors are the affected party as they will be on the Project site during construction and commissioning.

### **UE "Minskvodokanal" workers at the Project site**

Project workers are key stakeholders in the Project. Currently, UE "Minskvodokanal" employs a total number of 2,959 workers of whom 255 are employed at the MWWTP site where the Project will be implemented.

### **Interested parties**

#### **Government authorities, regulators and other organisations**

The governmental authorities with stake in the Project shall be of the following levels:

- Republican level
- Regional level.

This group includes the following organisations:

- RB State Control Committee
- SUE "Belvodokanal"
- RB Ministry of Finance
- RB Ministry of Economy
- RB Ministry of Housing and Utilities
- Minsk City Executive Committee
- RB Ministry of Natural Resources and Environmental Protection
- RB Ministry of Health
- Centre for Hygiene and Epidemiology of the city of Minsk
- Republican Scientific and Research Unitary Enterprise "Bel SRC "Environment"

#### **Representative bodies and local self-government bodies**

The Company interacts with the following representative bodies and local governments on various aspects of the Project implementation:

- Minsk City Deputies Counsel
- Administration of Zavodskoy district

#### **International Financial Institutions**

The Project received international funding from the two European IFIs, EBRD and EIB and the Republic of Belarus and the Company have signed a number of agreements imposing financial, environmental and social commitments on the Company.

### **National financial organisations**

The Belarusian Bank for Development and Reconstruction OJSC “Belinvestbank” acts as an agent bank of the Government of Belarus and administers the EIB loan, checks the correctness of settlements and notifications as well as compliance with the signed agreements, and advises the Company on the EBRD and EIB loans.

### **Consultants**

The technical assistance for the project is sought from international consulting companies supporting the Project in technical and financial matters, corporate development, procurement and construction supervision.

### **Workers’ organisations**

The primary trade union organisation at the Minskvodokanal, the Belarusian Trade Union of Local Industry and Utilities, protects the interests of workers and participates in the resolution of labour related disputes.

### **Project contractors, subcontractors and suppliers**

Minsk and Belarussian businesses are viewed as interested parties as they may potentially benefit from the Project as part of UE “Minskvodokanal” procurement activities. At present, contractors/suppliers have not yet been selected for the Project.

Decree of the President of the Republic of Belarus dated 19.12. 2019 No.469 establishes that procurement of goods, works and services by the Project shall be in compliance with the EBRD and EIB procurement rules and procedures, allowing international organizations to participate in competitive bidding. Potential for attraction of Belarusian companies is assessed as high and is substantiated by Resolution of the Minsk City Council No.213. The interaction with contractors is regulated by a special internal regulation of UE “Minskvodokanal” in the framework of the Company’s management system.

Currently UE “Minskvodokanal” develops tender documentation for design and build contractors.

### **Civil society and non-governmental organisations**

The Company representatives engaged with Belarusian Women Union (*‘Belorussky soyuz zhenshin’*) dedicated to discussion of discriminatory practices and related awareness-raising activities.

### **Press and mass media**

Minskvodokanal engages with the media on a regular basis via a Media plan prepared quarterly. The following mass media are active in the Minsk, Minsky district and Shabany neighbourhood:

- Newspapers:
  - Vecherny Minsk
  - Minsky Curyer
  - Blizkiye Novosti
  - Narodnaya volya
  - Komsomolskaya Pravda (Belarusian edition)
  - Respublica
  - Zvezda

- Press agencies:
  - Minsk-Novosti
- Radio:
  - Radio-Minsk
  - Minskaya Volna
  - Russkoye radio Minsk
  - Stolitsa
  - Alfa-radio
  - Radio Mir
- TV channels:
  - Stolichnoye Televidenie (STV)
  - Minsk TV
  - ONT
  - Belarus-1
- Websites:
  - City information site "Minsk-novosti" [www.minsknews.by](http://www.minsknews.by)
  - The webpage <http://blizko.by/regions/shabany> presents news relevant to Shabany neighbourhood
  - Website of "Narodnaya volya" newspaper
  - News website [TUT.by](http://TUT.by)

### **Higher and secondary education institutions**

The Company has cooperation agreements with two higher education institutions:

- Belarusian national technical university
- Belarusian state technological university
- Minsk state college for architecture and construction

Additionally, UE "Minskvodokanal" has cooperation agreements with three educational institutions providing vocational training.

Cooperation with all six educational entities includes internships for students and employment of recent graduates.

## **APPENDIX 4. GRIEVANCE FORM FOR EXTERNAL STAKEHOLDERS**



Public Enquiry Form			
Reference Number <i>[to be filled in by responsible person at UE "Minskvodokanal"]</i> :			
<b>Full Name</b> <i>Note: If you prefer so, you could keep this field anonymous or request non-disclosure of your identity information to a third party (tick an appropriate box)</i>	I request non-disclosure of my identity information. <input type="checkbox"/>  I would like to submit an <b>ANONYMOUS</b> enquiry. <input type="checkbox"/>		
<b>Contact Details</b>	Address:		
	Tel:		
	E-mail:		
<b>How would you prefer to be contacted?</b> <i>Please tick a box</i>	By post <input type="checkbox"/>	By phone <input type="checkbox"/>	By e-mail <input type="checkbox"/>
<b>Details of your grievance:</b> <i>[Please describe the problem, whom it happened to, when, where and how many times, as relevant]</i>			
<b>What is your suggested resolution for the grievance, if you have one:</b>			
How to submit this form to Minskvodokanal	By Post to the Head of Department of Environment and Development of Minskvodokanal Ms. Olga Zaitseva: Minsk, 15 Pulikhova street, 220088, Belarus (UE 'Minskvodokanal')		
	In person to the Head of Department of Environment and Development of Minskvodokanal Ms. Olga Zaitseva: please drop this form at the following address: Minsk, 15 Pulikhova street, 220088, Belarus (UE 'Minskvodokanal') Phone.: +375 17 389 40 20		
	By e-mail: Please email your grievance, suggested resolution and preferred contact details to: info@minskvodokanal.by		
Signature		Date	

**APPENDIX 5. GRIEVANCE FORM FOR INTERNAL STAKEHOLDERS**

Personnel Enquiry Form			
Reference Number <i>[to be filled in by responsible person at UE "Minskvodokanal"]</i> :			
<b>Full Name</b> <i>Note: If you prefer so, you could keep this field anonymous or request non-disclosure of your identity information to a third party (tick an appropriate box)</i>	I request non-disclosure of my identity information. <input type="checkbox"/>  I would like to submit an <b>ANONYMOUS</b> enquiry. <input type="checkbox"/>		
<b>Contact Details</b>	Address:		
	Tel:		
	e-mail:		
<b>How would you prefer to be contacted?</b> <i>Please tick a box</i>	By post <input type="checkbox"/>	By phone <input type="checkbox"/>	By e-mail <input type="checkbox"/>
<b>Details of your grievance:</b> <i>[Please describe the problem, whom it happened to, when, where and how many times, as relevant]</i>			
<b>What is your suggested resolution for the grievance, if you have one:</b>			
How to submit this form to Minskvodokanal	By Post to the Head of Department of Environment and Development of UE "Minskvodokanal" Ms. Olga Zaitseva: Minsk, 15 Pulikhova street, Belarus (UE 'Minskvodokanal')		
	By hand: please drop this form at the following address: Minsk, 15 Pulikhova street, 220088, Belarus (UE 'Minskvodokanal') The form shall be placed into the grievance box		
	By e-mail: Please email your grievance, suggested resolution and preferred contact details to: info@minskvodokanal.by		
Signature		Date	

**APPENDIX 6. ENGAGEMENT METHODS**

This Appendix describes the principles of major methods of those proposed in Figure 1 that could be potentially used for stakeholder engagement in the context of the Project. The plan presented in Appendix 5 identifies methods that will be used actually.

#### *General community meetings*

Community level meetings gather different local stakeholders usually in the presence of the local authority and within a formal framework (such as a public hearing, which is chaired by the local authority and duly minuted). The downside of this type of meetings is that only the most confident and vocal people will express their opinion freely or easily and they do not provide a very conducive consultation avenue. These meetings are nonetheless useful for the following reasons:

- They reassure the local public about the support the Project has from the authorities;
- They are appreciated as an effort of transparency and information sharing;
- They provide an opportunity to convey information to a large number of people and they complement smaller meetings by reassuring the local public that communication exchanged in smaller meetings corresponds to the "official" one.

The following stakeholders will be targeted by this method:

- Communities of former Shabany village, Novodvorsky rural council and Shabany neighbourhood.

#### *Face-to-face meetings*

Face-to-face meetings are a good way to build personal relationships, and are often used in engaging local authorities and local leaders. It is important to set expectations with the interlocutor on how the information will be used and the range of other people to be consulted, so no one is disappointed if all of his/her ideas are not reflected.

The following stakeholders will be targeted by this method:

- Governmental authorities at all levels;
- Former Shabany village residents;
- Project workers;
- Project contractors.

#### *Mass media*

Mass-media regional and local levels provide opportunities for information disseminations via the following methods:

- Press releases to keep the press updated of key milestones in the Project development;
- Interviews with Company management;
- Organised site tours for journalists (if necessary).

These methods are viewed as a good way to build proper relationship with mass-media active in the region.

The following stakeholders will be targeted by this method:

- TV channels' representatives;
- Radio stations' representatives;
- Newspapers' representatives;
- Other media representatives.

#### *Central and technical information contact*

Central and/or technical information contact enables local communities to have a personal conversation with the Project representative. The method allows instant and deeper response regarding Project activities. The method is currently not included into the action plan (see Appendix 5), however, may be necessary if requests from former Shabany village residents and other closely located affected residents are not satisfied by other engagement means.

The following stakeholders will be targeted by this method:

- Residents of former Shabany village;

- Novodvorsky rural council and Shabany village (**only directly affected community representatives** may have access to central and/or technical information contact);
- Rural communities in the vicinity to the Volma sludge ponds.

*Printed public information materials (including Project leaflet and newsletter)*

During the ESIA phase the has developed a simple *general* Project presentation leaflet (2 A4 pages) presenting the following information for broad disclosure:

- Project objectives and key characteristics, including exact location and main facilities to be constructed and improved;
- Project main environmental and social impacts;
- Project consultation mechanism;
- Project grievance mechanism;
- Availability of documentation (what, where);
- Contact information.

This leaflet will be updated and disclosed on the Project's website, and will also be distributed to interested stakeholders electronically, including to the administrations of the affected rural communities and local administration offices (including Zavodskoy district administration, public buildings in Shabany neighbourhood, Novodvorsky rural council administration and rural council administrations of communities in the vicinity to the Volma sludge ponds).

The following stakeholders will be targeted by this method:

- Communities of Zavodskoy district, former Shabany village, Novodvorsky rural council and Shabany neighbourhood, villages in the vicinity to the Volma sludge ponds.

*Project webpage*

The Project will open a dedicated webpage as part of Minskvodokanal website where Project information will be publicly available, which will be regularly updated with new informative postings, press releases, tenders and employment vacancies.

The following stakeholders will be targeted by this method:

- All stakeholders

*Response sheets*

Forms attached into Project-related materials will be placed in information repositories or filled in on the webpage. The response sheets are a cost-efficient way to gain input from a large number of people. To become an effective consultation tool, surveys need to be followed up with mechanisms for dialogue and consensus building.

The following stakeholders will be targeted by this method:

- All stakeholders.

*Tours (Site visits)*

Site visits consist of taking small groups of stakeholders (elected representatives at district levels, journalists, representatives of educational entities) to visit the Project site and can be very effective in conveying information on environmental and social impacts and mitigation measures.

The visit of Project facilities and offices by groups of pupils and students can also be effective as it can give an idea of the broad purpose of the Project, develop interest and local ownership, and provide information on higher education trainings supported by the Project.

The following stakeholders may be targeted by this method:

- Selected representatives of Minsk and Minsk region communities (including local pupils/students);
- Media;
- Civil organizations;
- Higher educational institutions (at regional level);

- Local authorities.

*Internal stakeholders engagement methods*

It is important to indicate the following methods of communication with the internal stakeholders represented by the Project workforce:

- Dissemination of the Code of Conduct, which is to be applicable to all Project workers, including contractors and subcontractors involved;
- Dissemination of any relevant corporate policies of Minskvodokanal;
- Information on internal grievance mechanism opportunities (see Section 7 for details);
- Familiarization with any rules governing the accommodation facilities (if used) and the consequences of breaking such rules;
- Arranging special stands with information of potential workers' interest;
- Regular meetings with workers' representatives aiming at discussion of current issues of the Project personnel.

## **APPENDIX 7. CONSULTATION AND DISCLOSURE ACTION PLAN**



N°	Stakeholder	Consultation Activity	Alternative methods in Covid-19	Timeline	Responsibility
	<b>Stakeholder engagement at the Project identification phase and during design and construction</b>				
1	<b>All stakeholders</b>	<b>Disclosure of the Project materials and Project status information via UE "Minskvodokanal" website</b> and regular updates	Alternative methods are not required	Starting from 2018 and through the Project lifecycle.	UE "Minskvodokanal" with support of an IT service, if needed
2	<b>All stakeholders</b>	<b>Disclosure of the UE "Minskvodokanal" feedback and grievance mechanism to the Project specifics</b> as per details presented in section 7: <ul style="list-style-type: none"> <li>• Disclosure of the Project SEP and CLO's contact information via the UE "Minskvodokanal" website</li> <li>• Publication of advertisements announcing SEP disclosure via the Company's website and mass media</li> <li>• Installation of grievance boxes and provision of feedback forms</li> </ul>	<ul style="list-style-type: none"> <li>• Electronic notification of the Project SEP and leaflet publication via SMS/water and wastewater (W&amp;WW) bills</li> <li>• Disclosure of the Project SEP and leaflet to the local self-governing bodies (Shabany neighbourhood, Novodvorsky rural council communities and former Shabany village community (via e-mail) and on community notice boards at local administration offices</li> <li>• Disclosure of the electronic feedback mechanism and CLO's contact information via W&amp;WW bills</li> </ul>	At the new EIA phase (if applicable) and at all phases in the Project lifecycle	UE "Minskvodokanal"
3	<b>Residents of the former Shabany village</b>	<b>Negotiation and consultations via face-to-face meetings and public consultations regarding the land use issues and potential relocation</b> (if applicable): <ul style="list-style-type: none"> <li>• Disclosure of the Resettlement Action Plan (RAP) via the Company's website and information repositories</li> <li>• Individual disclosure of the Project RAP to the project affected people</li> <li>• Individual consultations</li> <li>• Negotiations</li> </ul>	<ul style="list-style-type: none"> <li>• Individual telephone negotiations</li> <li>• Teleconference/video calls for public meetings or use of online platforms (e.g., zoom)</li> </ul>	At the design phase upon selection of the sludge management process, if applicable	UE "Minskvodokanal"

N°	Stakeholder	Consultation Activity	Alternative methods in Covid-19	Timeline	Responsibility
4	<b>Affected parties (residents of Shabany neighbourhood, Novodvorsky rural council communities, former Shabany village and communities in the vicinity to the Volma sludge ponds)</b>	<b>Public meetings to discuss IEA findings (if the selected sludge management process changes)</b> <ul style="list-style-type: none"> <li>• Advertisements in mass media, via the Company's website and in information repositories announcing the date, time and location of public meetings two weeks prior the event</li> <li>• Disclosure of the EIA documentation and the Project leaflet via the Company's website</li> <li>• Public meeting events</li> <li>• Disclosure of the public meetings protocols via the Company's website and information repositories</li> </ul>	<ul style="list-style-type: none"> <li>• Distribution (via e-mail) of the Project leaflet to all administration offices in the affected rural settlements</li> <li>• Publication of the leaflet in mass media, Company's website and its electronic distribution</li> <li>• Electronic /SMS/W&amp;WW bills advertisements of the public disclosure of the EIA documentation and the Project leaflet</li> <li>• Teleconference/video calls for public meetings or use of online platforms (e.g., zoom)</li> <li>• A dedicated teleconference/video call with CSOs/NGOs and other interested project stakeholders to discuss draft EIA findings</li> <li>• Disclosure of the public meetings protocols via the Company's website and electronic distribution to all stakeholders involved in the discussions</li> </ul>	At the design phase if a new sludge management process is selected	UE "Minskvodokanal" with the assistance of the design contractor

N°	Stakeholder	Consultation Activity	Alternative methods in Covid-19	Timeline	Responsibility
5	<b>Affected parties (residents of Shabany neighbourhood, Novodvorsky rural council communities, former Shabany village and communities in the vicinity to the Volma sludge ponds)</b>	<b>Regular consultation and Project information disclosure</b> , as follows: <ul style="list-style-type: none"> <li>Annually disclosure of the Project status via the Company's website</li> <li>General public meetings in the local administration offices on a six-monthly to yearly basis to present the Project progress and note any queries or grievances from communities</li> <li>Regular visits (as deemed necessary but at least every 6 months) to settlements and face to face meetings with administrations and community representatives (in case of former Shabany village)</li> <li>Information disclosure via media entries and information repositories (if a new EIA is needed)</li> </ul>	<ul style="list-style-type: none"> <li>Electronic/SMS/W&amp;WW bills notifications on the publication of the Project leaflet</li> <li>Distribution (via e-mail) of the Project leaflet to all administration offices in the affected rural settlements</li> <li>Teleconference/video calls for public meetings or use of online platforms (e.g., zoom)</li> <li>Disclosure of the electronic feedback mechanism and CLO's contact information via W&amp;WW bills</li> </ul>	At the construction phase	UE "Minskvodokanal" with the assistance of the consultant, if required
6	<b>Residents of Zavodskoy district and Minsk in general</b>	<b>Regular community consultation and information</b> , as follows: <ul style="list-style-type: none"> <li>Annually disclosure of the Project status via the Company's website</li> <li>Regular face-to-face meetings with the administration of Zavodskoy district of Minsk to discuss the Project progress and any issues;</li> <li>Information disclosure via media entries and information repositories</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Electronic/SMS/W&amp;WW bills notifications on the publication of the Project leaflet</li> <li>Teleconference/video calls for public meetings or use of online platforms (e.g., zoom)</li> <li>Community disclosure of the electronic feedback mechanism and CLO's contact information via W&amp;WW bills</li> </ul>	At the construction phase	UE "Minskvodokanal"

N°	Stakeholder	Consultation Activity	Alternative methods in Covid-19	Timeline	Responsibility
7	<b>Project contractors, sub-contractors and suppliers</b>	<b>Informing potential contractors, sub-contractors and suppliers about Project opportunities</b> and Project employment/procurement policies: <ul style="list-style-type: none"> <li>• Disclosure of the Project recruitment/procurement policy via the Company's website</li> <li>• Publication of procurement notices via the Company's website</li> <li>• Incorporation of the requirements to comply with the applicable environmental and social/ESMP requirements in the tender documentation and contracts</li> <li>• Regular reporting</li> <li>•</li> </ul>	Alternative methods are not required	At the Project identification and construction phases	UE "Minskvodokanal"
8	<b>Workers of the Project contractors and subcontractors</b>	<ul style="list-style-type: none"> <li>• Inform the workers of UE "Minskvodokanal" grievance mechanism</li> <li>• Disclose the Code of Conduct and other corporate policies of the Company to the workers and place them at notice boards at the Project sites</li> <li>• Install the grievance boxes where workers can lodge nominative or anonymous grievances for consideration by management</li> <li>• Disclose the contact information of the Project CLO and the TU committee of UE "Minskvodokanal"</li> </ul>	<ul style="list-style-type: none"> <li>• Electronic notifications to the workers of the grievance mechanism, Ethics Policy and other corporate policies</li> <li>• Electronic distribution of the grievance forms to the workers</li> <li>• Electronic disclosure of the contact information of the Project CLO and the TU committee of UE "Minskvodokanal"</li> </ul>	At the construction phase	UE "Minskvodokanal", contractors and subcontractors

N°	Stakeholder	Consultation Activity	Alternative methods in Covid-19	Timeline	Responsibility
9	<b>Consultants</b>	<ul style="list-style-type: none"> <li>• Central level and technical contacts</li> <li>• Technical assistance</li> <li>• Reporting</li> <li>• Assistance with monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Online central level and technical contacts</li> <li>• Online meetings/teleconferences on technical support issues</li> <li>• Reporting (via e-mail)</li> <li>• Support in virtual monitoring missions</li> </ul>	At the Project identification, design and construction phases	UE "Minskvodokanal", consultants
10	<b>Regional and local mass media</b>	<ul style="list-style-type: none"> <li>• Press-releases for further publication in mass-media</li> <li>• Media entries</li> <li>• Site tours for journalists during construction to report the progress if requested</li> </ul>	<ul style="list-style-type: none"> <li>• Press-releases</li> <li>• Media entries</li> </ul>	At the construction phase	UE "Minskvodokanal"
<b>Stakeholder engagement during operation</b>					
11	<b>Affected parties (residents of Shabany neighbourhood, Novodvorsky rural council communities, former Shabany village and communities in the vicinity to the Volma sludge ponds)</b>	<ul style="list-style-type: none"> <li>• Disclosure of the Project information via mass media (in line with the annual publications plan), Company's website, local administration offices</li> </ul>	Alternative methods are not required	Throughout the Project operation phase	UE "Minskvodokanal"
12	<b>Residents of Zavodskoy district and Minsk in general</b>	<ul style="list-style-type: none"> <li>• Disclosure of the Project information via mass media (in line with the annual publications plan) and Company's website</li> </ul>	Alternative methods are not required	Throughout the Project operation phase	UE "Minskvodokanal"
13	<b>Administration of Zavodskoy District</b>	<ul style="list-style-type: none"> <li>• Regular meetings (if required)</li> <li>• Face-to-face meetings with individuals in charge on specific issues, when warranted</li> <li>• Disclosure of the Project documentation to officers in charge against respective requests</li> </ul>	<ul style="list-style-type: none"> <li>• Teleconference/video call meetings or use of online platforms (e.g., zoom)</li> <li>• Documents sharing via e-mail</li> </ul>	Throughout the Project operation phase	UE "Minskvodokanal"

N°	Stakeholder	Consultation Activity	Alternative methods in Covid-19	Timeline	Responsibility
14	<b>Administration of Novodvorsky rural council and communities in the vicinity to the Volma sludge ponds</b>	<ul style="list-style-type: none"> <li>Regular meetings (if required)</li> <li>Face-to-face meetings with individuals in charge on specific issues, when warranted</li> </ul> <p>Disclosure of the Project documentation to officers in charge against respective requests</p>	<ul style="list-style-type: none"> <li>Teleconference/video call meetings or use of online platforms (e.g., zoom)</li> <li>Documents sharing via e-mail</li> </ul>	Throughout the Project operation phase	UE "Minskvodokanal"
15	<b>Project workers</b>	<ul style="list-style-type: none"> <li>Inform the workers of UE "Minskvodokanal" grievance mechanism</li> <li>Disclose the Code of Conduct and other corporate policies of the Company to the workers</li> <li>Disclose the contact information of the TU committee of UE "Minskvodokanal"</li> <li>Install grievance boxes where workers can lodge nominative or anonymous grievances for consideration by management</li> <li>Inform of potential workers about job opportunities and recruitment procedures in the Company via information repositories, mass media and the Company's website.</li> </ul>	<ul style="list-style-type: none"> <li>Announcements of available jobs and recruitment procedure via the Company's website</li> <li>Disclosure of the Ethics Policy via the Company's website</li> <li>E-mail notifications to the workers of the grievance mechanism in UE "Minskvodokanal"</li> </ul>	Throughout the Project operation phase	UE "Minskvodokanal"
16	<b>Regional and local mass-media</b>	<ul style="list-style-type: none"> <li>Press-releases for further publication in mass-media</li> <li>Media entries</li> <li>Site tours for journalists during operation if requested</li> </ul>	<ul style="list-style-type: none"> <li>Press-releases</li> <li>Media entries</li> </ul>	Throughout the Project operation phase	UE "Minskvodokanal"
<b>Stakeholder engagement throughout the Project lifecycle</b>					
17	<b>National and regional government authorities and regulators</b>	<ul style="list-style-type: none"> <li>Face-to-face meetings with individuals in charge on specific issues, when warranted</li> <li>Formal communications</li> <li>Round tables</li> <li>Compulsory reporting</li> <li>Control and inspections by regulators</li> </ul>	<ul style="list-style-type: none"> <li>Teleconference/video call meetings or use of online platforms (e.g., zoom)</li> <li>Formal correspondence via e-mail</li> <li>Reporting via e-mail</li> <li>Virtual site visits and inspections</li> </ul>	Throughout the Project lifecycle	UE "Minskvodokanal"

N°	Stakeholder	Consultation Activity	Alternative methods in Covid-19	Timeline	Responsibility
18	<b>Representative bodies and self-government bodies</b>	<ul style="list-style-type: none"> <li>• Face-to-face meetings with individuals in charge on specific issues, when warranted</li> <li>• Formal communications</li> <li>• Reporting</li> <li>• Site visits</li> </ul>	<ul style="list-style-type: none"> <li>• Teleconference/video call meetings or use of online platforms (e.g., zoom)</li> <li>• Formal correspondence via e-mail</li> <li>• Reporting via e-mail</li> <li>• Virtual site visits</li> </ul>	Throughout the Project lifecycle	UE "Minskvodokanal"
19	<b>International Financial Institutions</b>	<ul style="list-style-type: none"> <li>• Formal communications</li> <li>• Regular Project meetings</li> <li>• Semi-annual and annual reporting</li> <li>• Annual monitoring missions</li> </ul>	<ul style="list-style-type: none"> <li>• Formal electronic communications</li> <li>• Online Project meetings</li> <li>• Semi-annual and annual reporting via e-mail</li> <li>• Annual virtual monitoring missions</li> </ul>	Throughout the Project lifecycle	UE "Minskvodokanal", IFIs
20	<b>National financial organisations</b>	<ul style="list-style-type: none"> <li>• Formal communications</li> <li>• Reporting</li> <li>• Annual monitoring missions</li> </ul>	<ul style="list-style-type: none"> <li>• Formal electronic communications</li> <li>• Reporting via e-mail</li> <li>• Annual virtual monitoring missions</li> </ul>	Throughout the Project lifecycle	UE "Minskvodokanal"
21	<b>Workers' organisations</b>	<ul style="list-style-type: none"> <li>• Regular interaction through the workers' grievance mechanism</li> <li>• Workers' grievance reporting</li> </ul>	Alternative methods are not required	Throughout the Project lifecycle	UE "Minskvodokanal"
22	<b>Civil society and non-governmental organisations (if necessary)</b>	<ul style="list-style-type: none"> <li>• Notifications of the Project documentation disclosure</li> <li>• Disclosure of the Project documentation and information of the Company's website</li> <li>• Distribution of the Project leaflet</li> <li>• Public meetings</li> <li>• Press-releases</li> <li>• Potentially – site tours with representatives of CSOs/NGOs in the event of their interest in the Project</li> </ul>	Alternative methods are not required	Throughout the Project lifecycle	UE "Minskvodokanal"