

**UE Minskvodokanal**

**Stakeholder engagement plan**

**April, 2018**

# **MINSKVODOKANAL WASTE WATER TREATMENT PLANT STAKEHOLDER ENGAGEMENT PLAN**



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PLANT  
STAKEHOLDER ENGAGEMENT PLAN**

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# 1. INTRODUCTION

## 1.1 Introduction to the stakeholder engagement plan

Stakeholder Engagement Plan (SEP, Report or Plan) was prepared as part of the Project's Environmental and Social Impact Assessment (ESIA) process. 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.

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

Chapter 1 includes a brief description 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.

Chapter 6 describes the proposed engagement principles and action plan.

Chapter 7 describes the use of 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.

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 is considering providing a Sovereign guaranteed loan of up to EUR 84 million to UE Minskvodokanal ("Company"), a municipal enterprise wholly owned by the City of Minsk (the "City"), to finance a Priority Investment Programme ("PIP") for the modernisation and reconstruction of the Minsk wastewater facilities ("Project"). The proposed EBRD loan is expected to have several tranches and would be co-financed in equal amount by the European Investment Bank ("EIB"). The total project costs are estimated at EUR 168 million.

The loan will be used to co-finance: (i) reconstruction of Minsk WWTP to eliminate odour, optimise use of the existing facilities and enhance wastewater treatment efficiency of the plant in line with national and EU requirements, and (ii) construction of a sludge treatment facilities (including digestion, dewatering, drying and incineration) in line with EU BAT on the premises of the WWTP.

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 Dnieper River and the Black Sea basin.

### 1.3 Project Information

#### Minsk Waste Water Treatment Plant

Minsk Waste Water Treatment Plant (MWWTP) operated by UE Minskvodokanal is the country's largest facility for reception and treatment of waste water which currently treats 95% of domestic waste water from residential areas of the capital city and its neighbour settlements, as well as industrial effluents from dozens of industries.

The plant receives almost 500 thousand m<sup>3</sup> of water per day. This flow is distributed for treatment between two sites: the main one, MWWTP-1, dating back to 1963, and the less loaded site of MWWTP-2 with facilities commissioned during the period 2006-2015.

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 waste water 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 water logged, 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 ZNIIKIVR, 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 Minsk Waste Water Treatment Plant 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 waste water 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. 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 year 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 420,000 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. 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 waste water 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 any more (digesters, contact tanks, etc.) or are unsustainable (sludge beds, open channels for transportation of wastewater, grit basins, etc.)

#### **1.4 Sources of information**

The following information sources have been used to prepare this SEP:

- Results of the site visit and desktop studies carried out by Ramboll in November 2017 through February 2018;
- Results of consultation activities carried out by UE Minskvodokanal and Minskgrado before the ESIA process started;
- Responses of UE Minskvodokanal to information request of Ramboll in November 2017.



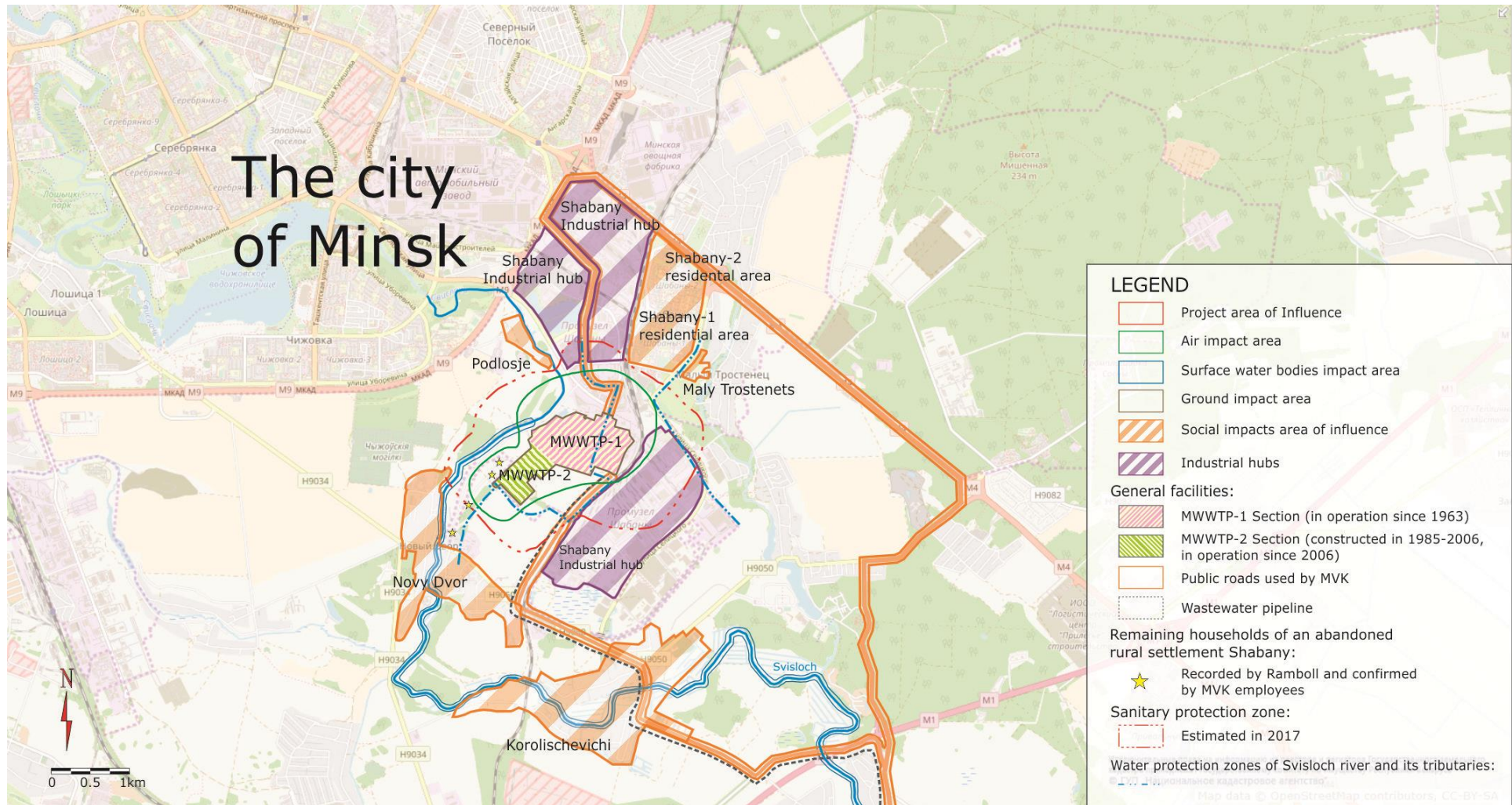


Figure 1.1: Project location and area of influence

## 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 published in 2014 considers 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 population.

In particular, in relation to the Project activities EBRD PR 10 requires stakeholder engagement in the process of the projects' development including the following:

- **Stakeholder Identification.** 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 Engagement Plan.** The project initiator will develop a Plan defining a procedure for relations with the identified stakeholders at different stages of the project preparation and implementation, including an appropriate grievance mechanism.
- **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 emphasizes the necessity to disclose information in the local language(s).
- **Meaningful consultations.** If the construction personnel and/or groups of the population are (or can be) exposed to significant risks or undesirable impacts by a project, the project initiator should conduct consultations in a culturally appropriate and meaningful manner, with the objective of providing 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.

Performance Requirement 10 also elucidates the necessity of continuous reporting to identified stakeholders during the project implementation. The project initiator has to report additional adverse impacts and significant alterations to planned activities should they occur. If such impacts and alterations are significant, the project initiator may need to carry out additional information disclosure and consultation.

Additionally, PR 10 sets the requirement to develop a fully-functioning grievance mechanism in order to be aware of and respond to stakeholder questions, comments and concerns.

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 1 contains an overview of legal requirements of Belarus and EBRD in regard to stakeholder involvement.

Table 1. Key stakeholder consultation requirements summary EBRD and Belarus	
EBRD PR10 requirements (ESP 2014)	Belarus requirements
<i>Stakeholders identification</i>	
<p>Identify people or communities that are or could be affected by the project, as well as other interested parties.</p> <p>Tailor stakeholder engagement to the needs of any disadvantaged or vulnerable groups as they may be disproportionally affected by planned activities due to their disadvantaged status.</p>	<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 organizations'.</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 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>Ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation.</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>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>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 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>2</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 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 information disclosure is provided.</p>
<p><i>Manner of engagement process</i></p>	
<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>
<p><i>Stakeholder engagement plan</i></p>	

<sup>2</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

Stakeholders should be able to provide comments and recommendations on the draft Stakeholder Engagement Plan.	No Stakeholder engagement plan development is required.
<i>Grievance mechanism</i>	
Establish a 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.	Submission of Grievances is possible during the public consultation processes

Appendix 1 provides additional information on the following applicable standards:

- International conventions;
- EBRD's environmental and social policy (2014);
- 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:

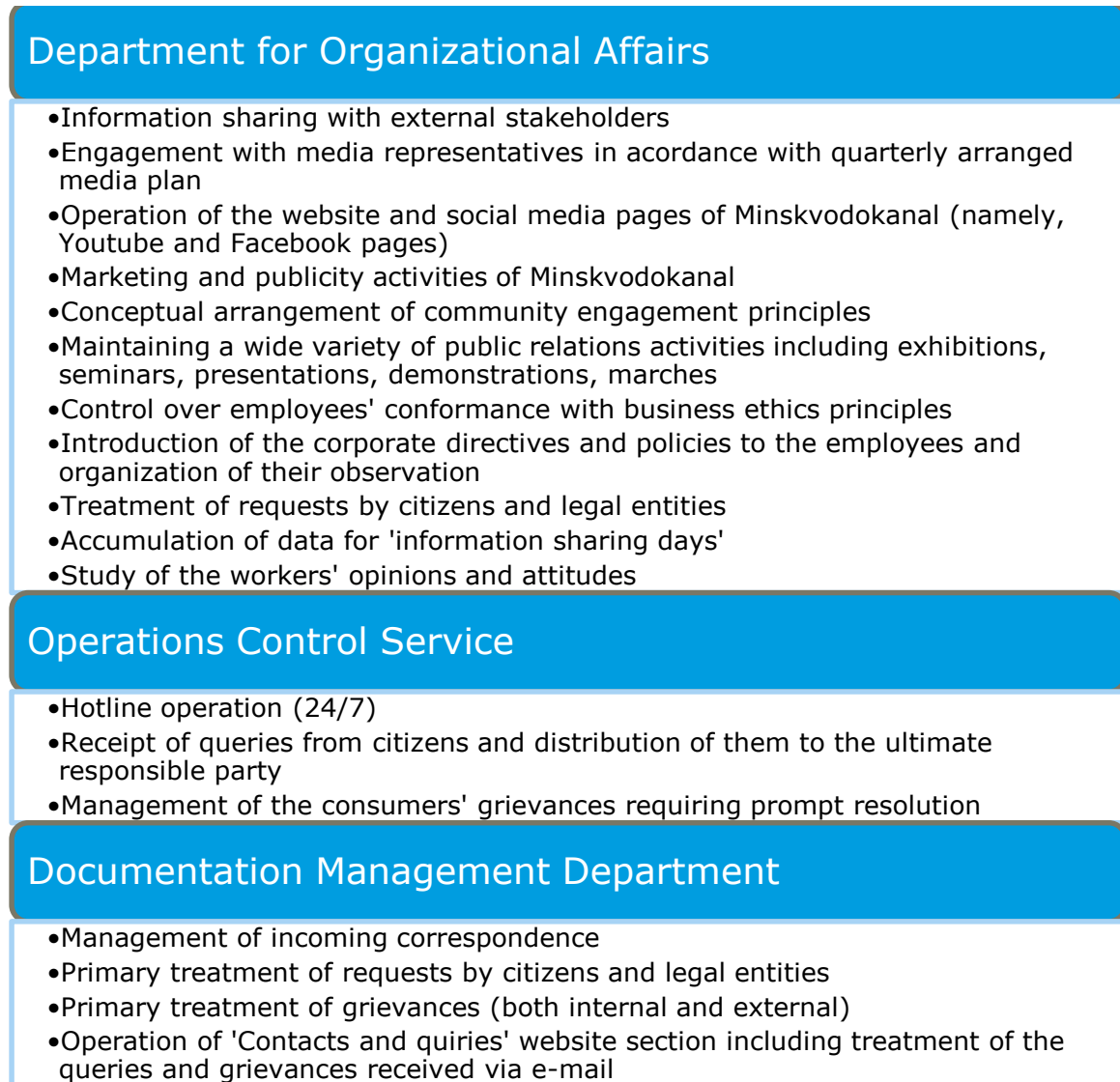
- Department for Organizational Affairs
- Operations Control Service
- Documentation Management Department

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 the figure below.

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



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

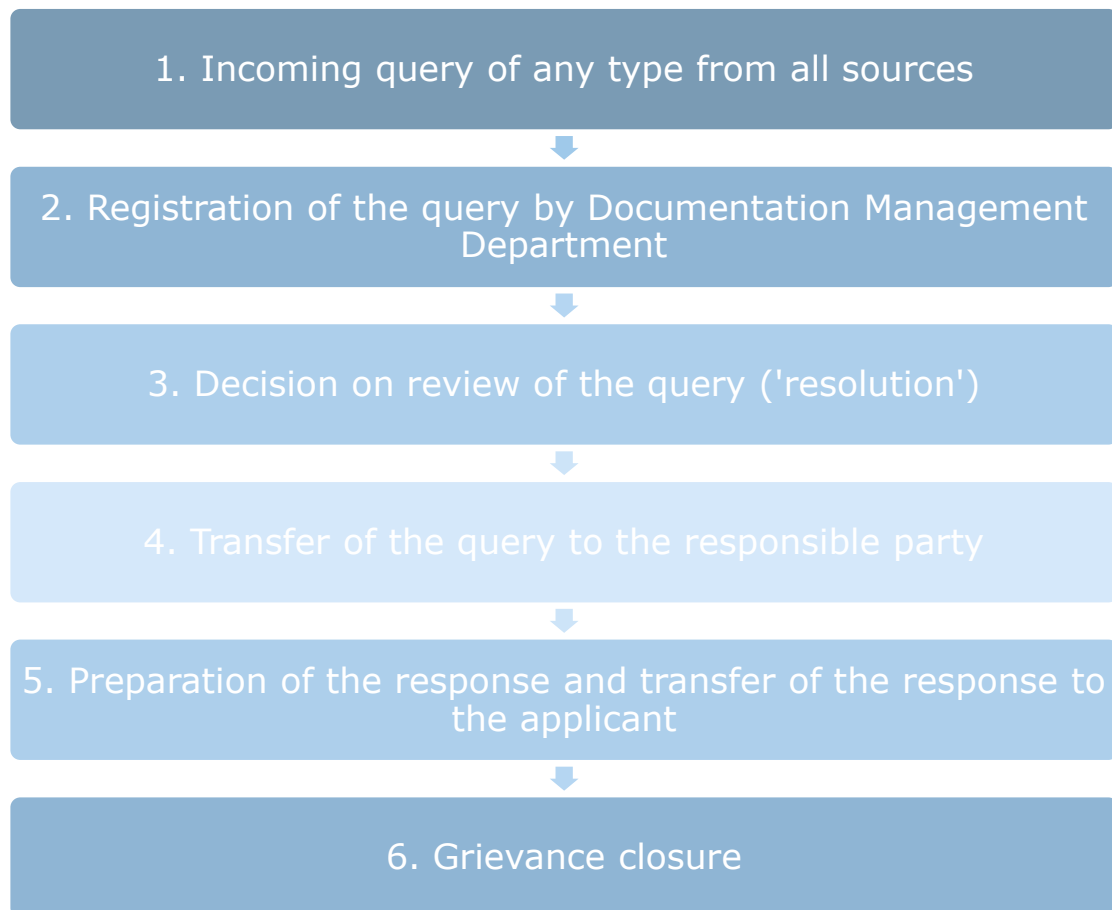


### 3.3 Grievance mechanism of Minskvodokanal

#### 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

For disclosing Project-related information and engaging with relevant stakeholders, the Company employs the following activities:

- Statutory consultations as part of the Belarusian EIA (OVOS);
- Public meetings held by Zavodskoy district administration jointly with Minskgrado;
- Disclosure of relevant information via media sources;
- Engagement activities taken by Ramboll in November 2017
- Relevant communication with stakeholders via established grievance mechanism of UE "Minskvodokanal".

### 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 proposals (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 waste water 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

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 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 centers where the stands are placed in order to publish up-to-date data on UE "Minskvodokanal" activities.

During the past two years the following media entries were published detailing the implementation of the Project and the overall issues of Minsk water treatment plant:

- TV Channel 'Stolichnoye televidenie': 'Environmental and efficient' report published on July 10<sup>th</sup>, 2017 and available at <https://www.minskvodokanal.by/press/mass-media/ctv-ekologichno-i-ekonomichno/>;
- Newspaper 'Respublica': 'On treatment campaign' article published on July 21<sup>st</sup>, 2017 and available at <https://www.sb.by/articles/ot-vsey-ochistnoy-kompanii.html>;
- Newspaper 'Minsky kuryer': 'At the limit of its capacity' article published on June 18<sup>th</sup>, 2017 and available at <http://mk.by/2017/06/28/165206/>;
- Website TUT.by: 'Reason for Minsk water treatment upgrade worth 150 million euro' article posted in June 28<sup>th</sup>, 2017 and available at <https://news.tut.by/society/549189.html>.

#### 4.4 Consultation activities taken by Ramboll

In November 2017, Ramboll consultants conducted the following stakeholder engagement activities:

- A meeting with the representatives of Minskgrado and administration of Zavodskoy district of the City of Minsk;
- A meeting with the Head of Novodvorsky rural council Nikolay Maksimchikov

During the first meeting, the following officials were interviewed:

- Natalya Gurkova-Maslova (Representative of the Committee of architecture and urban planning of Minsk executive committee)
- Marina Pivovarchik (Head of the Department of Architecture of the Directorate of Architecture and Construction of Zavodskoy district)
- Mikhail Drushchits (Representative of Minskgrado)

The topics raised and discussed:

- Spatial development of Shabany industrial urban area
- Major issues faced by the urban planners during the Shabany masterplan preparation
- Development of the Special Economic Zone 'Minsk'
- Public hearings and presentation of the project for extension of the Shabany industrial urban area towards the nearby rural areas and rural settlements
- Major grievances raised by local communities including Shabany-1 and Shabany-2 neighbourhoods and local rural settlements' residents
- Major concerns of local residents in relation to UE "Minskvodokanal" activities and other industrial practices in the area

During the meeting with the Head of Novodvorsky rural council, Ramboll consultant discussed a variety of topics on socio-economic development of local rural communities:

- Demographic structure of local communities;

- Social infrastructure capacity;
- Economy of Novodvorsky rural council;
- Local residents' demand for upgraded housing;
- The issue of three houses/buildings located on the territory of former Shabany village that are, reportedly, used as summer houses.

#### **4.5 Relevant communication with stakeholders via established grievance mechanism of UE "Minskvodokanal"**

UE "Minskvodokanal" receives periodic grievances from the residents of Sinilo village regarding the unpleasant scent from the sludge lagoons operated by UE "Minskvodokanal". The sludge is transported to these ponds from Minsk water treatment plant, which is subject to Project activities.

#### **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 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.

## 5. STAKEHOLDER IDENTIFICATION

### 5.1 Definitions and overview

**Stakeholders**<sup>3</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, the Project stakeholders have been categorised into the following key groups:

- *Affected Parties*

This category includes persons, groups and other entities 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 group involves affected land users, rural communities of Novodvorsky rural council, communities living in Zavodskoy district of Minsk, Project contractors and subcontractors and 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 of stakeholders includes various city-, district- and region-level authorities and elected officials, businesses, civil society groups, mass media representatives, and educational institutions.

More details on stakeholder groups are provided below.

#### 5.2.1 Affected Parties

##### 5.2.1.1 Affected land 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

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#### 5.2.1.2 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.

#### 5.2.1.3 Communities, businesses and state authorities of 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.

#### 5.2.1.4 Project contractors and sub-contractors

It is understood that UE "Minskvodokanal" shall invite contractors to perform the construction activities of the Project. All contractors and subcontractors shall be selected in accordance with the Belarusian legislation stipulating evaluation of qualification for construction contractors. The normative criteria for selection of contractors and for their evaluation include Presidential decree #26 and Resolution of the Cabinet of Ministers #252. Overall, the process of engagement with contractors is regulated by a UE "Minskvodokanal" internal document 'Engagement with contractors', which is part of the Company management system.

Currently, Construction Department of UE "Minskvodokanal" is in the process of defining the structure of contractors to be involved into the Project.

#### 5.2.1.5 Minskvodokanal workers involved employed at the Project site

Project workers are key stakeholders in the Project. Currently, UE "Minskvodokanal" employs a total number of 3,158 workers of whom 265 are employed at the Minsk water treatment facility which is subject to Project activities.

### 5.2.2 Interested parties

#### 5.2.2.1 Government authorities

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

- Republican level
- Regional level

State authorities of local level shall be considered as directly affected parties (see Section 5.2.1).

#### 5.2.2.2 Businesses of the city of Minsk and the Republic of Belarus in general

Minsk businesses are viewed as interested parties as they may potentially benefit from the Project as part of UE "Minskvodokanal" procurement activities. At present, there is no clarity on the actual list of businesses that are to be involved into the Project construction. However, local companies could play a role in the Project as sub-contractors to larger contractors. Potential for attraction of Belarusian companies is assessed as high and is substantiated by the Resolution #213 of the Minsk council of elected representatives.

#### 5.2.2.3 Civil society organisations

During the meetings held in November 2017, the representatives of the department in charge of personnel management informed consultants of Ramboll that the Company representatives engaged with Belarusian Women Union (*'Belorussky soyuz zhenschin'*) dedicated to discussion of discriminatory practices and related awareness-raising activities.

#### 5.2.2.4 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
- Press agencies:
  - Minsk-Novosti
- Radio:
  - Radio-Minsk
  - Minskaya Volna
  - Russkoye radio Minsk
  - Stolitsa
  - Alfa-radio
  - Radio Mir
- TV channels:
  - Stolichnoye Televidenie (STV)
  - Minsk TV
- 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)

#### 5.2.2.5 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.

## 6. ENGAGEMENT PLAN

### 6.1 Principles

Principles that will be used by the Company in devising its stakeholder engagement methods derive from PR10 of the EBRD and the EBRD's Public Information Policy (PIP). They include the following:

- Engagement will aim at providing local communities that are directly affected by the Project and interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.
- Stakeholder engagement will involve the following elements: stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders.
- The requirements of Belarusian national law with respect to public information and consultation will be met.
- The disclosure period starts 120 days prior to consideration of the project by the Board of Directors of EBRD as required by the PIP for public infrastructure projects.

The proposed methods for stakeholder engagement activities are outlined in Figure 4.

**Figure 4 Proposed methods for future stakeholder engagement**

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>
Information repositories	<ul style="list-style-type: none"> <li>•Tools: Use of publicly available buildings and venues</li> <li>•Objectives: Reaching broader public with Project-related 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>
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>
Response sheets	<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 community meetings (for ESIA package discussion)	<ul style="list-style-type: none"> <li>•Tools: Consultation meetings with affected parties will be held by the Company in May 2018</li> <li>•Objectives: Project-communities information exchange</li> </ul>
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>

Different stakeholders require different approaches and methods in engagement. In the description of the methods provided in Appendix 4, specific stakeholder groups will be identified as preferred targets of each method. The divisions of the Company responsible for delivery of each type of method will be based on the current stakeholder engagement approach taken by the Company. It is understood that UE "Minskvodokanal" has sufficient organizational capacities and experiences to adopt the listed methods by means of Department for Organizational Affairs, Operations Control Service, Documentation Management Department. Additionally, the listed departments may be assisted by other structural units and responsible parties, namely by specialists of the Construction Department and the Minskochistvod.

## 6.2 Consultation and disclosure action plan

The Supplementary ESIA package public consultations were held in May-August 2018 (see Section 4.6). Following these consultations, the Company shall take a broader approach to information disclosure and public engagement. The detailed Consultation and Disclosure Action Plan providing specifics of such approach for the Project life-cycle is provided in Annex 5.

## 7. GRIEVANCE MANAGEMENT AND REDRESS

### 7.1 Key principles

EBRD, 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 will be established as of early stages of the Project and 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 of this Plan, 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 Project leaflet shall contain a brief description of all opportunities for lodging a grievance provided by the Company. Additionally, the leaflet will be accompanied with an external grievance form as indicated in Appendix 2. The leaflet will be made available to core Project stakeholders at various venues as described in Section 6.2.

UE "Minskvodokanal" shall provide necessary arrangements to ensure that grievance forms disclosed together with the Project leaflets may be placed to the grievance boxes. 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 2 shall be preferred. The external grievance boxes shall be installed at the venues where the Project leaflets with the grievance forms attached are disclosed as indicated in Section 6.3 and Appendix 5. The grievances received via the grievance boxes shall 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" shall ensure that contractors' and subcontractors' workers have an opportunity to lodge their grievances, too. This may be achieved via installing grievance boxes aimed at collecting Project construction personnel grievances and comments/propositions. Such boxes shall be installed in the buildings where workers may gather, including the WWTP office, canteens (if used), accommodation 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 3 and should be located in the areas close to the grievance boxes. Grievances received by the Company or contractor in any other form shall be also considered. The grievances of contractors' workers received via the grievance boxes shall 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 digital control system (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 will be 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 will be 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

Olga Mikhailovona Zaitseva, the Head of Department of Environment and Development of UE "Minskvodokanal", was appointed as a key contact person for stakeholders. The Company will allocate stakeholder engagement responsibilities to the specialists from the existing departments (see Section 3 for details).

Additionally, the Company has a public relations department who will be specifically in charge of stakeholder engagement, including liaising with local community organisations, local government agencies, the local press and other mass media in the Project area of influence. Other Company specialists will be involved on as needed basis.

It is expected that 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 (revised in 2014) includes Performance Requirement 10 on "Information Disclosure and Stakeholder Engagement", which requires the following:

- Identify people or communities that are or could be affected by the project, as well as 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 on an ongoing basis through meaningful engagement during project implementation.

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 is bound to abide by both the Aarhus and the Espoo conventions.

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

<b>Public Enquiry Form</b>			
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 3. GRIEVANCE FORM FOR INTERNAL STAKEHOLDERS**

<b>Personnel Enquiry Form</b>			
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 4. 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.

#### *Information repositories*

The information repositories will be established by the Company in collaboration with local institutions serving as public spaces for local communities: libraries, administration offices, post offices, hospitals and schools. Use of information repositories will allow reaching broader public with Project-related information.

The information repositories will be equipped with the following:



- Grievance box (grievance forms will be available at the repository);
- Printed public information materials;
- Response sheets.

The following stakeholders will be targeted by this method:

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

#### *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).

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

The Project will develop 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 disclosed on the Project's website, and will also be available at the information repository and at local administration offices (including Zavodskoy district administration, public buildings in Shabany neighbourhood and Novodvorsky rural council administration).

The leaflet will be updated on as-needed basis.

The following stakeholders will be targeted by this method:

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

#### *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 5. CONSULTATION AND DISCLOSURE ACTION PLAN**

N°	Stakeholder	Consultation Activity	Information Disclosure	Indicative Timeline	Responsibility
1	<b>All stakeholders</b>	<b>Development of a Project webpage at Minskvodokanal website</b> to be maintained during the whole life of the Project (Construction and Operations phases).	Disclosure of information on Project webpage per details in section <b>Ошибка! Источник ссылки не найден..</b>	Project website to be established in Q1, 2018.	UE "Minskvodokanal" or IT service provider to set up the webpage
2	<b>All stakeholders</b>	<b>Opening of Information repositories</b> in Novodvorsky rural district and in Shabany neighbourhood (see section 276 and Appendix 4), to be maintained during the construction phase of the Project.	Disclosure of information at Project information repository per details in section <b>Ошибка! Источник ссылки не найден..</b> Former Shabany village community will be informed directly.	Project information centres to be established in April, 2018.	UE "Minskvodokanal"
3	<b>All stakeholders</b>	<b>Tailor the Minskvodokanal feedback and grievance mechanism to the Project specifics</b> per details presented in section 7, to be maintained during the whole life of the Project (Construction and Operations phase).	Project leaflet to include details on the grievance mechanism, including relevant contact information. Information repositories will have a grievance form, a response sheet and grievance boxes.	Mechanism to be updated in Q1, 2018.	UE "Minskvodokanal"
5	<b>Residents of the territory of 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> may be potentially required (Construction and Operations phase).	Individual disclosure of general Project objectives and timeline and information on Project's impacts on natural resources use.	Throughout construction and operations as necessary.	UE "Minskvodokanal"
6	<b>Residents of local rural and urban communities (Shabany neighbourhood, Novodvorsky rural council communities and former Shabany village community)</b>	<b>Negotiation and consultations via face-to-face meetings and public consultations regarding the land use issues and potential relocation</b> (for former Shabany village) (Construction and Operations phase).  <b>Regular consultation and information disclosure</b> , as follows: <u>In Construction phase:</u>	Disclosure of Project leaflet and other relevant documentation (see Annex 5) in offices of all relevant rural settlements' administrations to communities' elected representative as applicable. Disclosure of all relevant Project documentation on Project website (see	April 2018 (Public meeting for ESIA package discussion)  Throughout the Project life (construction and operations).	UE "Minskvodokanal" (Ramboll assistance if required)

N°	Stakeholder	Consultation Activity	Information Disclosure	Indicative Timeline	Responsibility
		<ul style="list-style-type: none"> <li>• Public meeting for ESIA package discussion (April 2018)</li> <li>• General public meetings on a six-monthly to yearly basis to present 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.</li> </ul> <p><u>In Operations phase:</u></p> <ul style="list-style-type: none"> <li>• Information disclosure via media entries and information repositories.</li> </ul>	<p>section <b>Ошибка! Источник ссылки не найден..</b>).  Direct information disclosure to community representatives (in case of former Shabany village).</p>		
7	<b>Residents of broader area of Zavodskoy district and Minsk in general</b>	<p><b>Regular consultation and information</b>, as follows:</p> <p><u>In Construction phase:</u></p> <ul style="list-style-type: none"> <li>• Regular face-to-face meetings with Zavodskoy district administration to discuss Project progress and any issues;</li> <li>• Information disclosure via media entries and information repositories.</li> </ul> <p><u>In Operations phase:</u></p> <ul style="list-style-type: none"> <li>• Information disclosure via media entries and information repositories.</li> </ul>	<p>Disclosure of Project leaflet (see section 6) in Zavodskoy district administration. Disclosure of all relevant Project documentation on Project website (see section <b>Ошибка! Источник ссылки не найден..</b>).</p>	Throughout the Project life (construction and operations).	UE “Minskvodokanal”

N°	Stakeholder	Consultation Activity	Information Disclosure	Indicative Timeline	Responsibility
8	<b>Project contractors and sub-contractors</b> (current and future)	<p><b>Informing potential contractors and sub-contractors about Project opportunities</b> and Project employment/procurement policies:</p> <p>In both <u>Construction and Operations phase</u>:</p> <ul style="list-style-type: none"> <li>Informing potential contractors and sub-contractors in face-to-face meetings organised directly for local entrepreneurs;</li> <li>Dissemination of Project procurement policies via information repositories, media and the Project webpage.</li> </ul>	<p>Disclosure of Project leaflet (see Appendix 4) via information repositories, media and the Project Website.</p> <p>Disclosure of all relevant Project documentation on the Project website (see Appendix 4).</p> <p>Creation of a page on the website about procurement opportunities and Project procurement policies and rules.</p>	<p>From start of construction until the commissioning.</p> <p>During operations as required.</p>	UE "Minskvodokanal"
9	<b>Project workers</b>	<p><b>Inform the workers on Minskvodokanal grievance mechanism</b> and relevant Project policies via hand-out materials (e.g. with assistance from the head of the trade union)</p> <p><b>Install</b> the grievance boxes where workers can lodge nominative or anonymous grievances for consideration by management.</p> <p><b>Inform of potential workers</b> about work opportunities and recruitment procedures.</p>	<p>Disclosure of Project leaflet and recruitment procedures and vacancies via information repositories, media and the Project Website.</p> <p>Dissemination of the Code of Conduct</p> <p>Informing the workers on adopted Minskvodokanal grievance mechanism via hand-out materials.</p>	From commissioning and throughout the Project operations	UE "Minskvodokanal"
10	<b>Government authorities at State level</b>	<b>Face-to-face meetings</b> with individuals in charge on specific issues, when warranted.	Documentation to be provided per specific request of individuals in charge.	Throughout Project life.	UE "Minskvodokanal"
11	<b>Government authorities at Regional level</b>	<b>Face-to-face meetings</b> with individuals in charge on specific issues, when warranted.	Documentation to be provided per specific request of individuals in charge.	Throughout Project life.	UE "Minskvodokanal"
12	<b>Administration of Zavodskoy District</b>	<p><b>Regular meetings</b> on a six-monthly basis (construction phase; when warranted during operations).</p> <p><b>Face-to-face meetings</b> with individuals in charge on specific issues, when warranted.</p>	Documentation to be provided per specific request of individuals in charge.	Throughout Project life.	UE "Minskvodokanal"
13	<b>Administration of Novodvorsky rural council</b>	<p><b>Regular meetings</b> on a six-monthly basis</p> <p><b>Face-to-face meetings</b> with individuals in charge on specific issues, when warranted.</p>	Documentation to be provided per specific request of individuals in charge.	Throughout Project life.	UE "Minskvodokanal"

N°	Stakeholder	Consultation Activity	Information Disclosure	Indicative Timeline	Responsibility
14	<b>Regional and Local Mass-Media</b>	<b>Press-releases</b> for further publication in mass-media. <b>Site tours</b> for journalists during construction to report the progress <u>if requested</u> .	Press-releases. Media entries.	Throughout Project life.	UE "Minskvodokanal"
15	<b>Civil Society Organisations (if necessary)</b>	<b>Potentially – site visits</b> with representatives of civil society organisations in the event of their interest in the Project.	Press-releases. Documentation available on the website.	Throughout Project life.	UE "Minskvodokanal"

