

# Sarimay-Muruntau OHTL

## Environmental & Social Impact Assessment (ESIA): Volume V – Stakeholder Engagement Plan

Consulting Firm:

**Juru**

**Juru Ltd**

Suite 1, One George Yard, London, United Kingdom,  
EC3V 9DF

[www.juru.org](http://www.juru.org)

Prepared for:



**JSC "National Electric Grid of Uzbekistan"  
(NEGU)**

Osiye street, 42, Yunusabad district, Tashkent city,  
Uzbekistan, 100084

[www.uzbekistonmet.uz](http://www.uzbekistonmet.uz)

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<b>Juru’s Project Manager</b>	Nicola Davies
<b>Juru’s Project Director</b>	Jushkinbek Ismailov

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## Abbreviations

AOI	Area of influence
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
EU	European Union
FGD	Focus Group Discussions
GBV	Gender-Based Violence
GIP	Good Industry Practice
GM	Grievance Mechanism
JSC	Joint Stock Company
KII	Key Informant Interviews
LARF	Land Acquisition and Livelihood Restoration Framework
LLC	Limited Liability Company
NEGU	National Electric Grid of Uzbekistan
NGO	Non-governmental Organisation
NTS	Non-Technical Summary
OHTL	Overhead Transmission Line
O&M	Operations and Maintenance
PAP	Project Affected People
PEF	Purchase Electric Facilities
PIU	Project Implementation Unit
PPA	Power Purchase Agreement

PRs	Performance Requirements
PSD	Project Summary Document
ROW	Right of Way
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
S-M	Sarimay-Muruntau
SS	Substation
SWID	State Committee of Sericulture and Wool Industry Development

## Glossary

Term	Definition
Khokimiyat	Administrative body that is responsible for executing and managing region/district/city on behalf of state. The term “Khokimiyat” is equal to “municipality”.
Mahalla	Self-governing organization that manages administrative and social issues of certain living community.

# 1 Introduction and Project Summary

## 1.1 Project background and location

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing a sovereign loan to the Republic of Uzbekistan to Joint-Stock Company National Electric Grid of Uzbekistan (JSC NEGU) to finance the construction of a 500 kV overhead transmission line (the Project) in Uzbekistan between the existing Sarimay substation in Khorezm region and the Muruntau substation (currently under construction) in Navoi region (see Figure 2).

The Project's main purpose is to facilitate the evacuation to the national power grid of the electricity generated by renewable energy power plants currently under development. Implementation of the Project will also significantly improve the transmission network's reliability, efficiency, stability, quality and security of the electricity supply.

All EBRD projects are required to follow its Environmental and Social Policy 2019 (ESP 2019) and supporting Performance Requirements (PRs). EBRD PR1, Appendix 2: (paragraph 24) makes specific reference to “construction of high voltage overhead electrical power lines” and states that such projects have the potential to generate significant adverse environmental and social (E&S) impacts. Considering the statement in EBRD PR1 Appendix 2 and the findings of the Project Scoping Report, the Project has been categorised as Category “A” under EBRD’s categorization.

Category A projects require a comprehensive Environmental and Social Impact Assessment (ESIA) and associated documents, followed by public disclosure of key documents for a minimum period of 120 days on the EBRD’s website. This requirement aligns with the European Union (EU) environmental impact assessment (EIA) Directive requirements for Annex I projects. EBRD has appointed Juru Ltd. (Juru) to perform the ESIA for the Project. The sequence of steps for the ESIA study is presented in Figure 1

According to the list of activities subject to Uzbekistan environmental approval, established by the Resolution of Cabinet of Ministers No. 541 “On further improvement of the environmental impact assessment mechanism’ (2020)”<sup>1</sup>, a 500 kV power transmission line is categorised as Category II under the national categorization. A national environmental impact assessment (EIA) has been prepared by Juru on behalf of JSC NEGU as part of the national feasibility study including public hearings performed in December 2023.

This document is the stakeholder engagement plan (SEP), and is Volume V of the full ESIA package. It has been prepared on behalf of the NEGU to maintain and guide stakeholder engagement over the lifetime of the Project. This SEP is currently focusing on engagement during the ESIA preparation, and this iteration of the document presents the findings of stakeholder engagement activities undertaken for the scoping and ESIA phase. The SEP will remain a live document and will be subject to further updates during the construction and operations phases. This document also

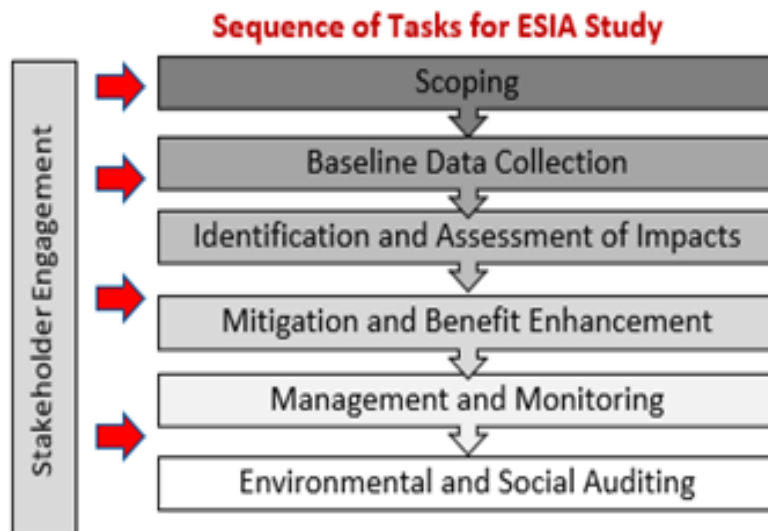
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<sup>1</sup> Under the Resolution of Cabinet of Ministers of Uzbekistan No 541, Power transmission lines of state and interstate significance – Category I (high risk); Power transmission lines of the Republic of Karakalpakstan, regions and the city of Tashkent significance – Category II (medium risk); Power transmission lines of district and city (except Tashkent) significance – Category III (low risk).



documents consultation and engagement exercises undertaken to support the development of the Land Acquisition and Livelihood Restoration Framework (LARF), Volume VI, ESIA.

Figure 1: ESIA process – sequence of steps (source: Juru)



## 1.2 Project location

The proposed Overhead Transmission Line (OHTL) is set to be situated in the southwestern part of the Kyzylkum Desert. It starts from the existing Sarimay substation (SS) in the Khorezm region, which is in close proximity to both the Nukus village (approximately 300 meters) and the Sarimay village (approximately 4.3 kilometers), and extends to a planned Muruntau substation located in the Navoi region. The OHTL will traverse through four different regions and five districts, including:

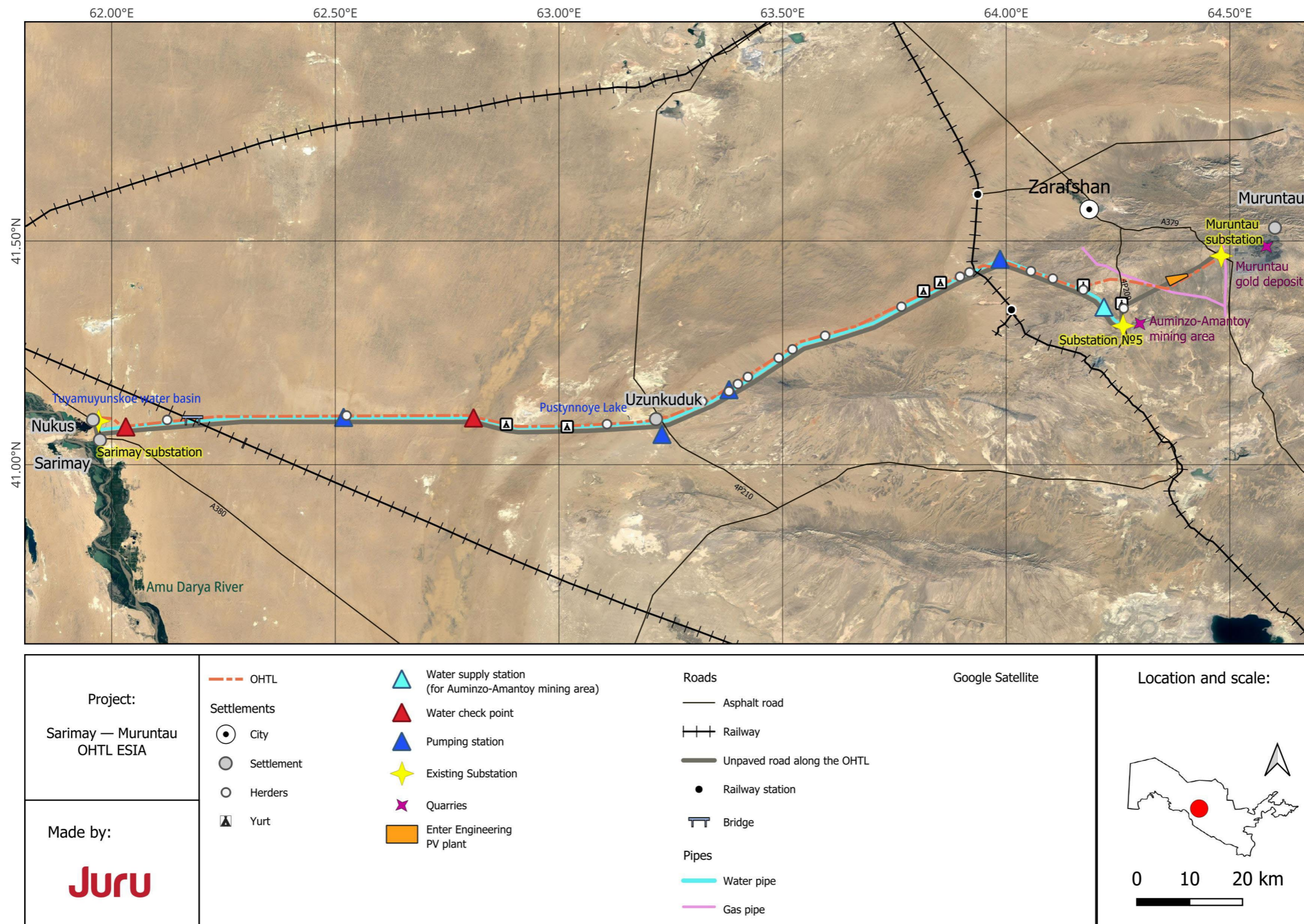
- Khorezm region (Tuprokkala district);
- Republic of Karakalpakstan (Turtkul district);
- Bukhara region (Peshku district);
- Navoi region (Uchkuduk and Tamdi districts).

The Project location is illustrated in Figure 2 and following that Figure 3 provides the location of receptors at and close to the Project route.

Figure 2: Project location



Figure 3: Receptor map (project right of way and indirect area of impact)



### 1.3 Socio-economic overview

There are three communities located near to the proposed OHTL. The location of the communities is illustrated in Figure 11. Sarimay and Nukus communities are located around 4.3 km and around 300 m away from existing Sarimay substation respectively, while the third community called Uzunkuduk is situated near to the middle of the OHTL. The nearest house in Uzunkuduk to the OHTL is located 210 m away from the OHTL.

Initial baseline observations determined that the land along the OHTL right of way (ROW) is used by local herders for grazing activities (see Figure 10). No social structures, other than shepherd huts (including both fixed physical structures and movable yurts), were identified along the OHTL route. The infrastructure in the area of influence (AOI) includes local transmission lines, underground water pipelines, communication lines, and a gas pipeline. To monitor and provide technical services to the water pipeline, local water stations are placed at a distance of every 500 m to 1 km along the pipeline (Figure 4 shows an example of a water station checkpoint). Some of these water stations have a water pump and/or borehole that can be used by herders to water their animals (see Figure 6). The Project will also cross 4P209 and 4P210 roads and two railway lines.



Figure 4: Water checkpoint



Figure 5: Water pipeline



Figure 6: Water pump boreholes for livestock

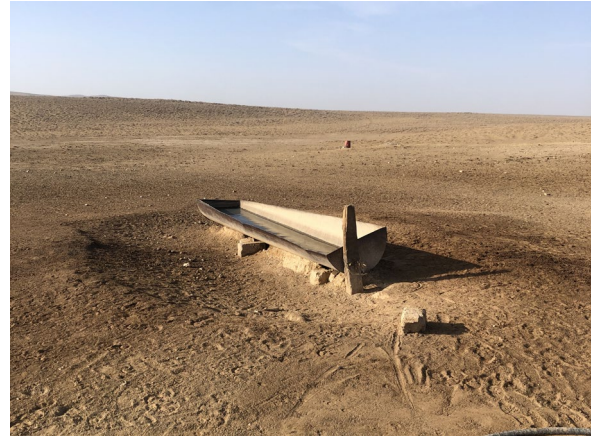


Figure 7: Drinking trough for animals

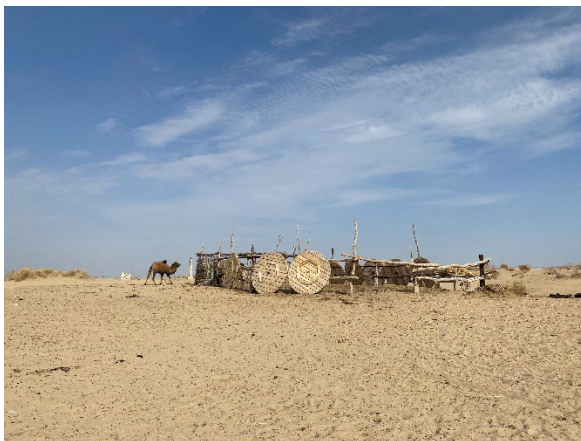


Figure 8: Common animal pen

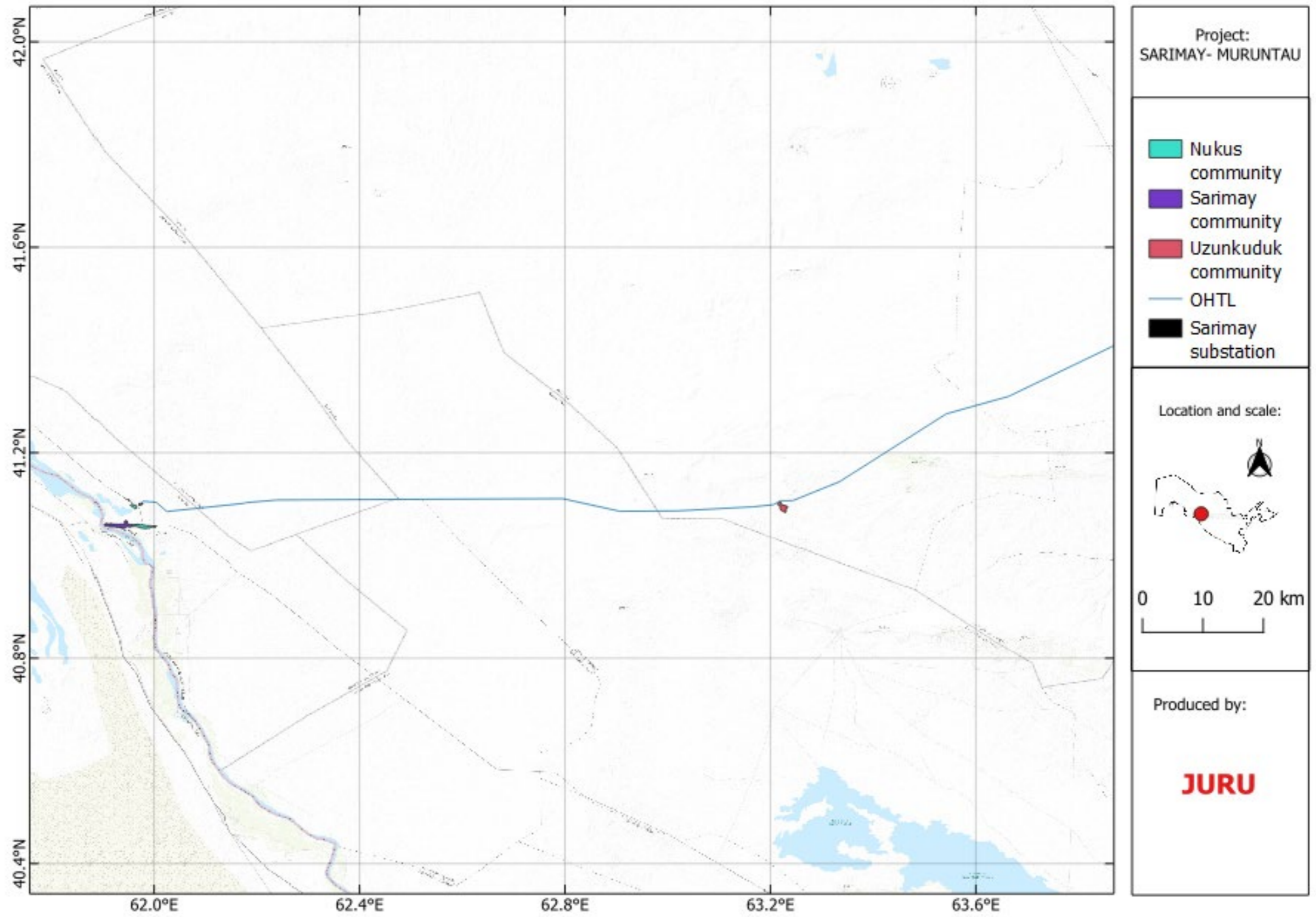


Figure 9: Buildings used by herders



Figure 10: Livestock grazing

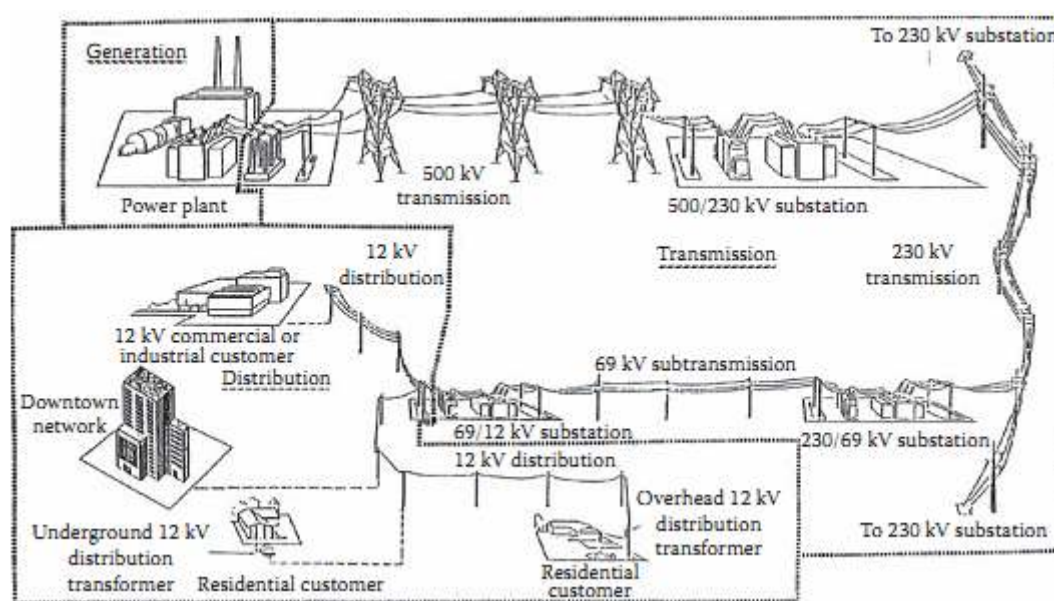
Figure 11: Location of AOI Communities



## 1.4 Project components

The concept of energy transmission is illustrated in Figure 12 shows the key features of a typical energy transmission and distribution system. The generating station produces electric energy at around 15-25 kV. At the generating station, a transformer is used to increase (“step up”) the voltage to a voltage more appropriate for transmission (e.g., 500 kV as for this Project). The higher the voltage, the less energy loss is incurred during transmission. In Uzbekistan, 500 kV OHTLs are used to transmit electricity between 500 kV substations. At these substations, energy may then be stepped down to 220 kV for transmission at a more regional level and then to even lower voltages for distribution around cities from which it is reduced to 110 kV for distribution along streets and then finally to 240/110 V to supply homes.

Figure 12: Concept of electric energy transmission



The main components of an OHTL are the following:

- Towers,
- Foundations
- Insulators,
- Conductors (wires), and
- Earth wire.

All the OHTL's components are illustrated in Figure 13. All components will be designed following the relevant statutes and norms of the Republic of Uzbekistan and good industry practice (GIP). Towers are typically self-supporting or guyed towers depending on the final design choice and are made from galvanised steel.

Figure 13: Components of an OHTL (source: Juru)



A summary of the key characteristics of the OHTL is provided in Table 1. A final decision on many of the technology choices, e.g., type of OHTL tower or the number of towers, has not yet been made.

Table 1: Summary of OHTL characteristics

<b>Circuit type</b>	Single or double
<b>Number of phases</b>	2 or 3
<b>Approximate length of OHTL</b>	229 km
<b>Tower Type</b>	Combination of suspension, angle and terminal towers
<b>Number of suspension towers</b>	~500
<b>Number of angle towers</b>	~72
<b>Tower height</b>	30 to 40 m
<b>Typical Span</b>	300 m to 400 m
<b>Optical Ground Wire (OPGW)</b>	Yes



Related activities required to support the main OHTL include:

- end-user works at the existing Sarimay SS;
- end-user works at the Muruntau SS;
- establish 60 m<sup>2</sup> ROW under the OHTL (including the provision of any related livelihood compensation);
- upgrade existing road suitable to provide access to the OHTL tower worksites.

The Sarimay SS is already in operation under the control of JSC NEGU. Private third parties are currently constructing the Muruntau SS. Once operational, both facilities will be transferred to JSC NEGU, which will assume responsibility for operations and maintenance (O&M) activities.

## 1.5 Land take requirements

There is a possibility of both temporary and permanent land take requirements as a result of the Project. The main laydown area will be identified at a later date, but is likely to be within land at either end of the OHTL near or within the substation boundaries. Worker accommodation will be in nearby towns of Nukus, Sarimay or Muruntau, with some small worker camps along the ROW. There will also be servitude rights required for the area underneath the OHTL right of way.

The following is a summary of the land ownership in each district:

- **Tuprokkala district** – land belongs to the State Committee of Sericulture and Wool Industry Development (SWID). The lands of SWID were given to “Khorezm sheep-breeding cluster” Limited Liability Company (LLC) for rent based on a long-term contract.
- **Turtkul district** – the land plots belong to SWID and are leased to two farms called “Dilmurod-chorva” and “Oq-darband-chorva”.
- **Peshku district** – the areas OHTL passes through belong to only SWID and is leased to Jonkeldi LLC
- **Uchkuduk district** – the land plots the OHTL crosses are owned by SWID that leases the land to “Uchquduq chorva klasteri” LLC as well as three farms called “Uchquduq Zamin Gulshani”, “Dilmurod Sharif”, and “Chorvador Rajab Narzulla”. All three farms are owned by one person.
- **Tamdi district** – OHTL intersects lands of JSC Navoi Mining and Metallurgical Company, JSC “Navoiyazot” and SWID that leases its land to Darxan 2019 LLC. They all own extremely large areas.

## 1.6 Objectives of the stakeholder engagement plan

Stakeholder engagement assumes the process of identifying, mapping and prioritizing stakeholders that might be impacted due to the Project activities or have a certain interest or decision-making status.

The main objectives of the current SEP are as follows:

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<sup>2</sup> 30m either side of the ROW

- Identifying and mapping potential Project stakeholders;
- Preparing a stakeholder matrix that includes all impacted and interested stakeholders as well as key organizations that have decision-making responsibilities for the Project (e.g., the State Committee on Ecology and Environmental Protection);
- Establishing relevant communication approaches for each stakeholder group to deliver Project information and conduct consultations;
- Recording feedback, concerns, and views of stakeholders regarding the Project;
- Developing and maintaining relevant grievance mechanisms (GMs) to accommodate all stakeholders; and
- Establishing proper/suitable means of communication with vulnerable groups and women to ensure they are sufficiently consulted about the Project and to identify any risks relating to gender-based violence (GBV) including sexual exploitation and abuse (SEA).

## **2 Completed Stakeholder Engagement**

### **2.1 Overview**

This section includes a summary of all stakeholder engagement undertaken to the date of writing of this SEP as defined in section 1.0. This section will be live and continuously updated throughout the Project's lifetime.

### **2.2 Scoping stakeholder engagement**

During the scoping site visit (21-25 October 2023) to inform the preparation of the Scoping report, consultations took place with the following key stakeholders:

- Hazorasp District Municipality;
- Turtkul District Municipality;
- Peshku District Municipality;
- Uchkuduk District Municipality;
- Tamdi District Municipality;
- Tuprokala District Municipality.
- Uzunkuduk community;
- Sarimay community;
- Nukus community;
- Reservoir of 5th hydrometallurgical plant of JSC Navoi Mining and Metallurgical Company;
- Sarimay substation representatives; and
- Muruntau substation representatives.

During the meetings, participants were provided with leaflets that provided the key information about the planned Project as well as contact details of the ESIA Consultant. A sample of the leaflet is provided in Annex A.

During the scoping meetings, two grievances or issues were raised by the community: one from makhalla deputy chairman regarding work opportunities, the second from a local farmer who asked for rerouting around his property which was subsequently reflected in the routing design.

## 2.3 Stakeholder consultation at ESIA stage

During site visits in December 2023-January 2024, the following activities were undertaken to inform the preparation of the ESIA and LARF:

- Notifications to key stakeholders (no response required);
- Business correspondence;
- Focus group discussions (ESIA and LARF) (FGDs);
- Key informant interviews (KIIs);
- Public hearing for national EIA

As with the scoping phase, during the meetings, participants were provided with project information about the planned Project in the form of an ESIA Brochure (Annex A) as well as contact details of the ESIA Consultant. The summary of meetings with local social receptors is summarised in Table 3 below.

Table 2: Summary of public consultation meetings and disclosure activities

No	Stakeholder (Organization/Job Title)	Type of Consultation	Date	Location	No. of participants	Summary of discussion	Questions/ Concerns Raised by Stakeholder	Provided Response	Information disclosed
1	Peshku district municipality	Focus group discussion	January 15,2024	Peshku municipality	13 participants	Disclosure of ESIA outcomes (Project description, technical specification, Project schedule, Project impacts and mitigation measures and etc.)	The question regarding job opportunities were asked by participant.	Job positions will be awarded to a competitive selection process.	Project presentation
2	Uchkuduk district municipality	Focus group discussion	January 17,2024	Uchkuduk municipality	11 participants	Disclosure of ESIA outcomes (as above)	When does the construction phase of Project start?	Construction phase of Project will be implemented in the 1st quarter of 2025 and it will be completed in the first quarter of 2026.	Project presentation

No	Stakeholder (Organization/Job Title)	Type of Consultation	Date	Location	No. of participants	Summary of discussion	Questions/ Concerns Raised by Stakeholder	Provided Response	Information disclosed
3	Tamdi district municipality	Focus group discussion	January 17, 2024	Tamdi municipality	11 participants	Disclosure of ESIA outcomes (as above)	Will there be any job opportunities for residents of Tamdi district?	Job positions will be awarded to a competitive selection process.	Project presentation
4	Tuprokkala district municipality (Sarimay and Nukus villagers)	Focus group discussion	January 18, 2024	At School No. 11 Tuprokkala district	11 participants from Sarimoy village and 11 participants from Nukus village	Disclosure of ESIA outcomes (as above)	1) How important is the project to Uzbekistan?	The Project contributes to the development of the energy sector of Uzbekistan. It will serve to connect the north-western and south-western power grid systems of Uzbekistan.	Project presentation

No	Stakeholder (Organization/Job Title)	Type of Consultation	Date	Location	No. of participants	Summary of discussion	Questions/ Concerns Raised by Stakeholder	Provided Response	Information disclosed
5	Uchkuduk district municipality of Navoi region (Uzunkuduk village)	Focus group discussion	January 18, 2024	At Uzunkuduk makhalla	14 participants from Uzunkuduk village	Disclosure of ESIA outcomes (as above)	1. Does the project affect houses?	The project does not affect houses.	Project presentation
6	Turtkul district municipality	Focus group discussion	January 19, 2024	Turtkul district municipality	11 participants	Disclosure of ESIA outcomes (as above)	What is the purpose of the Project?	The Project contributes to the development of the energy sector in Uzbekistan. It will serve to connect the north-western and south-western power grid systems of Uzbekistan.	Project presentation

## **3 Stakeholder Engagement Requirements**

### **3.1 Overview**

The Project, including this SEP, will comply with Uzbekistan's legal requirements and procedures and the Lender's E&S requirements, summarised in the following sections. In addition, the most effective modes of engagement for each stakeholder will be considered.

### **3.2 National requirements**

Uzbek legislation does not require projects to undertake a stakeholder engagement and communication process. It does not oblige project developers to conduct consultations to assess possible project impacts on local communities and businesses, and there is no requirement to disclose the environmental assessment results.

The Resolution of Cabinet of Ministries №541 "On Further Development of Mechanisms for Conducting National Environmental Impact Assessment in the Republic of Uzbekistan" does, however, require projects to conduct a public hearing with relevant organizations as well as local communities, to receive their support regarding the Project implementation. The public hearing should be recorded and documented with the evidence of participants' signatures. This requirement is mandatory only for projects under Category I and II. This Project is considered Category II, and therefore this requirement will apply. Juru conducted the public hearing on January 15-19, 2024 under national feasibility study.

Law № 781 "On Procedures for the Withdrawal of Land Plots for Public Needs with Compensation" requires meaningful consultations with Project affected people (PAP) who can be physically or economically displaced as a result of the Project. The Project expects a small number of PAPs will be economically displaced by the Project, and therefore this requirement will also apply.

Furthermore, the Law of the Republic of Uzbekistan № 378 "On Appeals of Individuals and Legal Entities" dated 3.12.2014 (as amended on 17.08.2017), provides a legal basis for communication between individuals and legal entities with state organizations as well as their officials. According to this Law, individuals and legal entities can send their grievances and appeals in any form (verbal, written, or electronic). Submitted appeals should be reviewed within 15 days from the date of receipt. If additional investigation is required, a response should be sent within one month.

### **3.3 Lender requirements**

The following section discusses Lender requirements relevant to the implementation of this SEP. The stakeholder engagement requirements of EBRD are discussed below.

#### **3.3.1 EBRD Environmental and Social Policy**

The Project will follow the stakeholder engagement requirements found in the EBRD Environmental and Social Policy (ESP 2019). EBRD Performance Requirement 10 (PR10) requires identification of stakeholders and establishment of a means of communication with them. All communication, as well as the stakeholders identified, should be documented in a Stakeholder Engagement Plan (SEP) that is subject to public disclosure.



The amount of communication required under PR10 is subject to the nature of the project as well as the need for the project to receive baseline information to identify possible project risks and impacts.

PR10 establishes the following key elements for stakeholder engagement:

- Stakeholder identification and analysis;
- Stakeholder engagement planning;
- Information disclosure;
- Consultations and participation;
- Grievance mechanism; and
- Ongoing reporting to relevant stakeholders.

This Project is proposed to be categorised as Category “A” under the categorization of the ESP 2019. A project is categorised as A when it could result in potentially significant environmental and/or social impacts, including direct and cumulative environmental and social impacts, which are new and additional and, at the time of categorisation, cannot readily be identified or assessed.

EBRD will determine the scope of environmental and social appraisal on a case-by-case basis. Category A ESIA's need to be disclosed for a total of 120 days prior to project financing. Additional information to be disclosed includes; the Project summary document (PSD, developed by the EBRD), environmental and social management plan (ESMP), non-technical summary (NTS), and environmental and social action plan (ESAP) as applicable.

## **4 Identification of Stakeholders and Communication Methods**

### **4.1 Overview**

Stakeholders can be considered to be people, groups or organizations affected by a Project, either directly or indirectly, and those that may have interests in the Project. Stakeholders interested in the Project may be able to influence its outcome, either positively or negatively.

This SEP includes a Stakeholder Engagement Matrix consisting of individuals, communities, organizations, and Government agencies that are considered stakeholders of the Project. The Stakeholder Engagement Matrix is based on the outcomes of consultations during the Scoping Phase site visit and ESIA engagement and will be changed or modified, i.e., new stakeholders' groups can be added and removed throughout the Project lifecycle as stakeholders and their interest in the Project change.

By applying a systematic approach, the current stakeholder matrix has been classified into three main categories based on the type of interest:

- (A) – Affected/impacted stakeholders (these can be directly or indirectly affected by the Project).
- (I/D) – Interest-based stakeholders (those with a specific interest in the Project, i.e., the Project's beneficiaries, NGOs, and civil society) and decision-making stakeholders (groups/individuals/organizations that make a decision regarding the Project, i.e., Project lenders, local regulators etc.)

### **4.2 Stakeholder identification**

This matrix will be subject to further modifications and amendments throughout the lifecycle of the Project.

Table 3: Stakeholder engagement matrix (last updated March 18, 2024)

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
Project-affected landowners and land users	Lease holders – Farmers/herders (to be confirmed)	<b>A:</b> Lease holders subject to economic displacement as a result of land acquisition for the Project’s development.	<ul style="list-style-type: none"> <li>• Disclosure of project plans, potential E&amp;S impacts, and mitigation strategies.</li> <li>• Request for information on potentially impacted property, resources and land tenure.</li> <li>• Establishment of the Project’s external Grievance Mechanism (GM).</li> </ul>	<ul style="list-style-type: none"> <li>• Official announcements.</li> <li>• Community meetings.</li> <li>• Focus Group Discussions (if needed).</li> <li>• Key Informant Interviews (KIIs) (if needed).</li> <li>• Household surveys (during LARF-stage).</li> <li>• Local disclosure of ESIA and LARF documents package.</li> <li>• Social media/Telegram.</li> </ul>
	Land users – Informal settlers	<b>A:</b> Land users (without legally demonstrable entitlements to the land) subject to economic displacement as a result of land acquisition for the Project’s development.		
	Land users – Informal herders	<b>A:</b> Land-users subject to economic displacement as a result of land acquisition for the Project’s development.		
	Land users – Farmworkers (to be confirmed)	<b>A:</b> Indirect land-users subject to economic displacement as a result of land acquisition for the Project’s development.		

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
<b>Project-Affected Communities (PACs/ Makhallas)</b>	Uzunkuduk	<b>A:</b> Communities subject to E&S impacts from various project aspects.	<ul style="list-style-type: none"> <li>• Disclosure of project plans, potential E&amp;S impacts, and mitigation strategies.</li> <li>• Request for information on potentially impacted public infrastructure and resources.</li> <li>• Request for specific information on local demography, household economy and social services.</li> <li>• Establishment of the Project's external Grievance Mechanism (GM).</li> </ul>	<ul style="list-style-type: none"> <li>• Official announcements.</li> <li>• Community meetings.</li> <li>• FGDs.</li> <li>• Household surveys (ESIA-stage).</li> <li>• Local disclosure of ESIA and LARF documents package.</li> <li>• Social media/Telegram.</li> </ul>
	Sarimay			
	Nukus			
<b>Projected Affected LLCs</b>	"Uchkuduk Chorva Cluster" LLC	<b>A:</b> Lease holders subject to economic displacement as a result of land acquisition for the Project's development.	<ul style="list-style-type: none"> <li>• Disclosure of project plans, potential E&amp;S impacts, and mitigation strategies.</li> <li>• Request for information on potentially impacted property, resources and land tenure.</li> <li>• Establishment of the Project's external Grievance Mechanism (GM).</li> </ul>	<ul style="list-style-type: none"> <li>• Official announcements.</li> <li>• Community meetings.</li> <li>• Focus Group Discussions (if needed).</li> <li>• Key Informant Interviews (KIIs) (if needed).</li> <li>• Household surveys (during LARF-stage).</li> <li>• Local disclosure of ESIA and LARF documents package.</li> <li>• Social media/Telegram.</li> </ul>
	"Darxan 2019" LLC	<b>A:</b> Lease holders subject to economic displacement as a result of land acquisition for the Project's development.		
	"Jonkeldi" LLC	<b>A:</b> Lease holders subject to economic displacement as a result of land acquisition for the Project's development.		

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
	"Khorezm Sheep-breeding Cluster" LLC	<b>A:</b> Lease holders subject to economic displacement as a result of land acquisition for the Project's development.		
<b>Local governmental authorities</b>	Khoresm region	<b>I/D:</b> Regional planning and administration of development projects (if needed).	<ul style="list-style-type: none"> <li>• Disclosure of Project plans (objectives, design and activities).</li> <li>• Request for information on potentially impacted public infrastructure and resources.</li> <li>• Request for general information on local demography, household economy and social services.</li> <li>• Request for general information on socioeconomically vulnerable community groupings.</li> <li>• Request for information on local biodiversity and ongoing conservation initiatives.</li> <li>• Establishment of the Project's external Grievance Mechanism (GM).</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence</li> <li>• Phone calls</li> <li>• Face to face meetings.</li> </ul>
	Republic of Karakalpakstan			
	Bukhara region			
	Navoi region			
	Peshku district	<b>I/D:</b> District-level planning and administration of development projects. Preparation of land-use proposals, approval of subsequent land-use plans, commissioning of cadastral registration of landholdings, and administration of Land Lease Agreements (LLAs).		
	Turtkul district			
	Tamdi district			
	Uchkuduk district			

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
	Tuprokkala district			
National Ministries, Departments, and Agencies (MDAs) – Energy.	Ministry of Energy.	<b>I/D:</b> Review and approval of project design, land acquisition, operational off-take and O&M of planned power generation facilities post power purchase agreement (PPA) term completion.	<ul style="list-style-type: none"> <li>• Disclosure of plans and designs for the main project facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>
	National Electricity Grids of Uzbekistan (NEGU)	<b>I/D:</b> Review and approval of project design, land acquisition, operational off-take and O&M of planned interconnection facilities post PPA term completion.	<ul style="list-style-type: none"> <li>• Responsible for the operations and maintenance of Purchase Electric Facilities (PEF).</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>
	Hududgaztaminot JSC	<b>I/D:</b> Provision of general information on planned and existing gas pipelines (if any) within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of gas supply infrastructure (e.g., appropriate buffer zones).	<ul style="list-style-type: none"> <li>• Disclosure of project plans (objectives, design and activities).</li> <li>• Request for information on existing gas pipelines located in and around the project area.</li> <li>• Request for regulatory buffers for gas pipelines</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
			located in and around (if any) the project area.	
	Uztransgaz JSC	<b>I/D:</b> Provision of general information on planned and existing gas pipelines (if any) within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of gas supply infrastructure (e.g., appropriate buffer zones).	<ul style="list-style-type: none"> <li>• Disclosure of project plans (objectives, design and activities).</li> <li>• Request for information on existing gas pipelines located in and around the project area.</li> <li>• Request for regulatory buffers for gas pipelines located in and around (if any) the project area.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>
	Ministry of Water Resources of the Republic of Uzbekistan	<b>I/D:</b> Provision of general information on planned and existing water pipelines (if any) within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of water supply infrastructure (e.g., appropriate buffer zones).	<ul style="list-style-type: none"> <li>• Disclosure of project plans (objectives, design and activities).</li> <li>• Request for information on existing water pipelines located in and around the project area.</li> <li>• Request for regulatory buffers for water pipelines located in and around (if any) the project area.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
	Uzsuvtaminot JSC	<p><b>I/D:</b> Provision of general information on planned and existing water pipelines (if any) within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of water supply infrastructure (e.g., appropriate buffer zones).</p>	<ul style="list-style-type: none"> <li>• Disclosure of project plans (objectives, design and activities).</li> <li>• Request for information on existing water pipelines located in and around the project area.</li> <li>• Request for regulatory buffers for water pipelines located in and around (if any) the project area.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>
<b>Mining Industry</b>	Ministry of Geology and Mining Industry	<p><b>I/D:</b> Provision of general information on planned and existing gas pipelines (if any) within the Project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of gas supply infrastructure (e.g., appropriate buffer zones).</p>	<ul style="list-style-type: none"> <li>• Request for information on any existing or planned prospecting areas in and around the project sites.</li> <li>• Request for information on any geotechnically hazardous land in and around the project sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>



Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
MDAs – Environment and Climate Change	Ministry of Ecology, Environmental Protection and Climate Change (MEEPCC)	<p><b>I/D:</b> Provision of information on biodiversity and ecologically important water resources within the project-affected areas. Execution of laws and regulations pertaining to environmental management. Review of national EIA reports for planned project facilities. Issue of environmental permits for construction and operation. Follow-up monitoring of E&amp;S compliance.</p>	<ul style="list-style-type: none"> <li>• Disclosure of Project plans (objectives, design and activities).</li> <li>• Request for information on the presence of species and habitats of conservation concern within the project-affected areas.</li> <li>• Request for information on ongoing conservation programs and protected areas in and around Project-affected areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>
	Institute of Zoology of the Academy of Sciences of the Republic of Uzbekistan.	<p><b>I/D:</b> Provision of information on biodiversity and technical support on ad-hoc baseline surveys for specific faunal species and habitats.</p>	<ul style="list-style-type: none"> <li>• Ad-hoc request for information on the extent of occurrence and are of occupancy (or population statistics), for any potentially affected faunal species or habitats of conservation concern.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>
	Institute of Botany of the Academy of Sciences of the	<p><b>I/D:</b> Provision of information on biodiversity and technical support on ad-hoc baseline surveys for specific floral species and habitats.</p>	<ul style="list-style-type: none"> <li>• Ad-hoc request for information on the extent of occurrence and are of occupancy (or population statistics), for any potentially</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
	Republic of Uzbekistan.		affected faunal species or habitats of conservation concern.	
<b>MDAs-Land Administration</b>	Cadastral department of Khoresm region.	<b>I/D:</b> Cadastral registration of landholdings, based on approved land-use plans developed by Uzdaverloyiha State Research and Design Institute.	<ul style="list-style-type: none"> <li>Ad-hoc requests for cadastral information for delineation of potentially affected landholdings.</li> </ul>	<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>
	Cadastral department of Republic of Karakalpakstan			
	Cadastral department of Bukhara region			
	Cadastral department of Navoi region			
	State Committee on Sericulture and Wool Development Industry	<b>I/D:</b> Custodianship of land reserved for governmental, communal and private pastoral use.	<ul style="list-style-type: none"> <li>Request information on any existing pastoral land parcels in and around the Project site</li> <li>Request for information on tenure of pastoral land.</li> <li>Information on number of potentially affected herders.</li> </ul>	<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>
<b>MDAs - Health, Sanitation,</b>	Sanitary and Epidemiological			<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
<b>Safety and Security</b>	Welfare and Public Health Service of The Republic of Uzbekistan	<b>I/D:</b> Execution of laws and regulations pertaining to public health and safety. Establishment of sanitary and health and safety buffer zones. Regular monitoring of E&S compliance in relation to impacts on environment and public health and safety.	<ul style="list-style-type: none"> <li>• Disclosure of project plans (objectives, design and activities).</li> <li>• Request for information on sanitary and safety buffers for planned project facilities and existing utility assets and water bodies located in and around the project sites.</li> </ul>	
	Ministry of Emergency Situations of the Republic of Uzbekistan <sup>3</sup>	<b>I/D:</b> Emergency response to natural disasters and other contingencies, and mobilization of humanitarian aid.	<ul style="list-style-type: none"> <li>• Ad-hoc request for information on emergency response capacity and protocols, for natural and other contingencies in relation to the project (i.e., fire outbreak and river flooding).</li> </ul>	<ul style="list-style-type: none"> <li>• Formal consultative letters/ correspondence.</li> </ul>

<sup>3</sup> No consultation is required at this stage. The further consultations will be provided by NEGU.

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
MDAs – Transport and Communication	Ministry of Transportation	I/D: Provision of information on the transport infrastructure within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of related infrastructure (e.g., tonnage, drainage, upgrade or extension of existing roads and traffic regulation).	<ul style="list-style-type: none"> <li>Ad-hoc request for feedback on any upgrades to the existing roads for the Project’s construction and operational phases (in addition to directives from regional and/or district departments).</li> </ul>	<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>
	Uzbektelekom	I/D: Provision of information on planned and existing telecommunication facilities (e.g., transmission cables) within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of these facilities (e.g., appropriate buffer zones).	<ul style="list-style-type: none"> <li>Request for information on existing telecommunication facilities in and around the project sites</li> <li>Request for regulatory buffers for above-ground and sub-surface telecommunication facilities (i.e., cables, towers etc.) located in and around the project sites, during the Project’s construction and operational phases.</li> </ul>	<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
<b>MDAs – Labour</b>	Ministry of Employment and Labour Relations of the Republic of Uzbekistan	<b>I/D:</b> Execution of laws and regulations pertaining to the labour in Uzbekistan, and provision of guidelines to implement new legal requirements.	<ul style="list-style-type: none"> <li>Ad-hoc request for guiding information on any newly enacted legal requirements for local employment.</li> </ul>	<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>
<b>MDAs – Cultural Heritage</b>	Academy of Sciences – Institute of Archaeology.	<b>I/D:</b> Provision of information on tangible and intangible cultural heritage within the project-affected areas, and completion of archaeological surveys for the national inventory of cultural heritage sites.	<ul style="list-style-type: none"> <li>Request for information on any ongoing archaeological surveys in and around the project sites.</li> <li>Request for information on any archaeological findings and/or cultural heritage sites in and around the project sites.</li> </ul>	<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>
	Academy of Sciences – Cultural Heritage Agency	<b>I/D:</b> Provision of information on tangible and intangible cultural heritage within the project-affected areas, and execution of laws and regulations pertaining to the labour in Uzbekistan.	<ul style="list-style-type: none"> <li>Request of information regarding any existing cultural heritage sites, or the potential for the existence any physical cultural resources within the sites</li> <li>Request for information on any requisite archaeological surveys in and around the project sites.</li> </ul>	<ul style="list-style-type: none"> <li>Formal consultative letters/ correspondence.</li> </ul>

Administrative order	Stakeholder	Relevance category Impact-based (A), or Interest-based/ Decision maker (I/D),	Consultation agenda	Method of communication
<p><b>Non-Governmental Organizations (NGOs)</b></p>	<p>NGO organizations in the region such as Uzbekistan Society for the protection of birds and Sanoat Energetika Guruhi” LLC</p>	<p><b>I/D:</b> Provision of information relevant to the NGO’s interests, such as avifaunal species and habitats of conservation importance, and related conservation programs.</p>	<ul style="list-style-type: none"> <li>• Request for information related to the NGO’s area of specialty, such as avifaunal species and habitats of concern, which occur in and around the Project sites.</li> <li>• Request for any additional considerations and recommendations with regard to potential impacts of avifauna.</li> </ul>	<ul style="list-style-type: none"> <li>• Official announcements.</li> <li>• Community meetings.</li> <li>• Formal consultative letters/ correspondence.</li> <li>• Social Media</li> </ul>

### 4.3 Consultation activities

The following methods will be used to inform stakeholders about the stakeholder engagement process during the ESIA process and beyond:

- Face-to-face meetings (also known as key informant interviews – KIIs) – this method will be applied to directly affected and decision-making groups of stakeholders. Also, to be implemented with vulnerable groups where relevant.
- Meetings with community leaders – these will be formal and informal meetings held with community leaders to maintain good relations with the community and address any concerns the community might have.
- Visual aids and leaflet distribution – such method will be suitable to inform large groups of stakeholders, such as local communities, about the Project, and grievance mechanism process.
- Social Media – can be used for communication with stakeholder groups who are not able to meet due to long distances.
- Public meetings – these may be in the form of large group meetings and will disclose Project information at key implementation phases throughout the Project lifecycle.
- Focus groups discussions (FGDs) – they will be used to gain information for the ESIA phase as well as conduct consultations with vulnerable groups.
- Written correspondence – used to invite stakeholders to public meetings. This may be in the form of letters, or business correspondence. Also used to disclose information at key Project phases to a wider distribution of both impacted and interested stakeholders.
- Phone calls – used to contact key national and local government stakeholders and also an alternative for vulnerable groups that have difficulty accessing information in other formats. It can also be used in lockdown situations when the health or security of stakeholders or staff may be at risk.
- Media releases – may be used at key Project phases to disclose information to wider stakeholder groups.

The method for communication selected in Table 5 is based on the interest of the stakeholder group and the influence it has as explained below:

- **In-depth engagement:** regular, one-on-one meetings, task groups, committees, and updates (via letter, telephone calls or emails).
- **Focused engagement:** periodic focus groups, letters, telephone calls and emails, where practicable.
- **Informed engagement:** occasional public meetings, project information through letters, flyers, internet, and advertisements in local media.
- **Opportunity to comment:** opportunities to lodge comments with the Community Liaison Officer (CLO) or Social Officer responsible for GBV directly or via Feedback Forms (during construction) or to provide comment via other means (to be determined at the appropriate

time) during operation. In each case, feedback forms will be available as well as opportunities to provide verbal feedback.

- **Information disclosure:** specific information disclosure events, flyers, advertisements in conventional media, e.g., radio and newspapers. Social media may be used, but a Telegram channel is more likely to be used by community members.

All stakeholder engagement will be carried out in a culturally appropriate manner and languages understood by stakeholders, these will include Uzbek, Kazakh (the predominant language of Uzunkuduk community), Turkmen (the predominant language in Sarimay and Nukus communities) and Russian as relevant.

Planning for engagement activities will consider cultural and economic elements to ensure the greatest number of stakeholders can attend (for example, when women can attend or when herders are at their houses and not out grazing their animals).

All meetings are arranged in advance and communicated via local and district leaders and other means. All meetings will include visual material and handouts in the local language. Meetings will be held at venues easily accessible to stakeholders, and transportation will be provided when necessary. All outputs will be documented (photos/video, completion of attendance registers and minutes of meetings) for circulation.

#### **4.4 Encouraging the participation of women**

Considering the local culture and traditions, stakeholder engagement will focus on implementing measures to ensure the active participation of women from local communities and farm workers, by arranging separate consultations and meetings.

Female moderators will lead these meetings, FGDs and consultations to create a comfortable atmosphere for women to be informed about the Project and actively participate, providing their views and concerns and sharing feedback.

#### **4.5 Vulnerable groups**

In addition to women (discussed above), vulnerable groups include low-income families, the unemployed, youth, older adults, children, and people with disabilities. They can also include people with poor literacy or the illiterate. These people will all have difficulty receiving information about the Project, providing their opinions, or raising their concerns about the Project.

To ensure the involvement of vulnerable groups, especially those who cannot attend the meetings due to physical disabilities, targeted stakeholder engagement will be held. Where possible, these consultations will be conducted in their homes or a location accessible to them.



## 5 Planned Stakeholder Engagement

### 5.1 Overview

This section summarises stakeholder engagement plans for the ESIA phase, pre-construction and construction phase of the Project. This SEP focuses on planned stakeholder engagement at the ESIA stage. This section will be continuously updated as engagement is undertaken and new requirements for engagement are defined for subsequent phases, including pre-construction, construction, commissioning, operation, and decommissioning. The next update of this SEP will be undertaken following completion of the Environmental and Social Impact Assessment disclosure process and prior to notice to proceed.

### 5.2 Stakeholder engagement planning

Table 6 outlines the stakeholder engagement and public disclosure activities for the remainder of the ESIA phase.

Table 4: Planned stakeholder engagement (last updated March 18, 2024)

No	Type of engagement	Stakeholder Group	Planned date	Notes
<b>Consultation during the ESIA phase</b>				
1	Business correspondence and meetings via telephone	Local governmental authorities, government bodies and NGO	On-going from October 2023	Some correspondence has already been completed.
2	Grievance mechanism	All stakeholder groups	On-going from October 2023	The grievance mechanism is in operation and will continue to be accessible.
3	ESIA disclosure (Lenders)	All stakeholder groups, focusing on community leaders, NGOs and local community members	March 2024	Disclosure of final draft ESIA package LARF, ESMP, NTS, SEP (framework), and the grievance mechanism (following inclusion of Lender comments and comments from the public consultation on draft ESIA).

No	Type of engagement	Stakeholder Group	Planned date	Notes
<b>Information disclosure after the ESIA Phase</b>				
4	Information disclosure, social media, and media releases prior to commencement of construction	All stakeholders	Prior to commencement of construction (expected to be Q3 2024)	
5	Public meetings prior to commencement of construction /finalisation of the ESIA	All stakeholders with specific attention to community leaders, the NGO and local community members	Prior to commencement of construction (expected to be Q3 2024)	Disclosure of the working draft NTS (including Grievance Mechanism) plus supporting leaflets in publicly accessible locations (e.g., for 2 weeks before the meetings and 2 weeks after the meetings). Meetings in all three communities. The materials will be translated in Uzbek language. Some notices may also be made in other local languages e.g contact information. NTS to be disclosed online on the EBRD website.
6	Face to face meetings/telephone calls before work commences in the identified grazing areas	Directly affected land users	Regularly until work commences, and at least two weeks before work commences in their grazing area (expected to be between	These meetings will include (but not be restricted to): <ul style="list-style-type: none"> <li>• LRP development (based on LARF)</li> <li>• Notification of payment of compensation;</li> <li>• Notification and implementation of the livelihood restoration training;</li> </ul>

№	Type of engagement	Stakeholder Group	Planned date	Notes
			Q3 2024 and Q1 2025)	<ul style="list-style-type: none"> <li>• Disclosure of the dates the land ownership will be transferred.</li> </ul>
7	Information disclosure, social media, and media releases	All stakeholders	At key milestones during construction	Upcoming project activities (e.g., material transportation, employment opportunities, grievance mechanism)
8	Public meetings	Community leaders, NGO and local community members	At key milestones during construction	To inform about upcoming project activities (e.g., material transportation, employment opportunities, grievance mechanism)
9	Information disclosure, media releases and social media prior to commencement of operations	All stakeholders	Prior to commencement of operations (expected Q1 2026)	Information on NEGU corporate complaints system.
10	Information disclosure, media release, social media, and annual reporting	All stakeholders	At key milestones during operations or at least annually	Part of NEGU corporate reporting process.

## **6 Responsibilities and Implementation**

### **6.1 Overview**

To ensure the effective functioning of the SEP and grievance mechanism, it is important to determine responsible parties and allocate responsibilities between them. This section will be updated should more responsible parties (such as the Main Contractor) join the Project. As of now, there are three main parties:

- The ESIA Consultant team – Juru;
- Project Implementing Unit (PIU) – JSC NEGU (Construction phase) / JSC NEGU (corporate) (operation phase); and
- The Lenders – EBRD.

The responsibilities for each key party are discussed in the sections below.

### **6.2 Key responsible parties**

#### **6.2.1 Juru**

Juru will be responsible for the implementation of stakeholder engagement throughout the Scoping and ESIA preparation of the Project until finalisation of ESIA disclosure. Juru's responsibilities include:

- Undertake high-level stakeholder engagement to inform the Scoping Report (undertaken in October 2023).
- Undertake stakeholder engagement, FGDs, and information disclosure to inform the ESIA preparation and disclosure (undertaken in December 2023/January 2024).
- Provide relevant stakeholders with information on the grievance mechanism, including contact details (ongoing).
- Public disclosure meetings on findings from the draft ESIA (including disclosure of the working draft non-technical summary in public locations) (undertaken in December 2023-January 2024)
- Assist in registering, monitoring, and responding to grievances received via the grievance mechanism in coordination with NEGU, EBRD, and other organisations as necessary (construction phase).
- Hand over stakeholder engagement and grievance requirements to NEGU following the completion of the ESIA disclosure phase.

#### **6.2.2 PIU - JSC NEGU / JSC NEGU (corporate)**

The PIU of JSC NEGU will take over stakeholder engagement requirements and grievance management following the completion of the ESIA phase. It will be ultimately responsible for stakeholder engagement for the construction phase. JSC NEGU (corporate) will be responsible for grievance management and stakeholder relations in the operation phase. During construction a project GM will be implemented. As the Project moves into the operation phase, the NEGU corporate grievance management process will be adopted for complaints related to the OHTL. JSC NEGU's general responsibilities are outlined below:

- Disclose this SEP on JSC NEGU's website.

- Investigate and close grievances following completion of the ESIA phase.
- Update this SEP for the construction phase.
- Take over and implement stakeholder engagement activities for all phases following the ESIA phase.
- Identify qualified staff to implement stakeholder engagement as per the SEP (for example, Community Liaison Officer (CLO) and a person responsible for receiving and responding to grievances) (project and corporate).
- Take over the receipt, response, and closure of grievances, after the ESIA phase of the Project, following the requirements of the grievance mechanism (included in Section 7 of this SEP).
- Provide relevant information and training to personnel and the EPC Contractor (and other contractors as relevant) about the grievance mechanism.

### **6.2.3 EBRD**

EBRD has specific requirements for stakeholder engagement under its loan modalities. It also has disclosure requirements that a project must comply with before loan disbursement. EBRD will also monitor the implementation of stakeholder engagement per its requirements. EBRD's responsibilities are as follows.

- Disclosure of redacted SEP on EBRD's website.
- Disclosure of the ESIA on the EBRD website.
- Monitor stakeholder engagement is completed per EBRD PR10 requirements throughout the loan disbursement period.
- Receive and manage any grievances about the Project raised directly to EBRD.

## **7 Grievance Mechanism**

### **7.1 Overview**

EBRD PR10 requires clients to establish an effective grievance mechanism (GM) in order to keep communication with stakeholders, i.e., be aware of their concerns, and provide responses to their inquiries. A well-functioning grievance mechanism can identify issues and address them before they escalate.

The GM has been and will continue to be disclosed during all public consultations and focus group discussions. A statement on the GM has been included in the Project Non-technical Summary (NTS) and grievance contact details will be included on all documents/ brochures a leaflet for disclosure to stakeholders.

For the ESIA phase, Juru acted as the Grievance Manager and is responsible for receiving grievances, with assistance from NEGU. Following the ESIA phase, the Grievance Manager's responsibilities will be entirely the responsibility of the PIU of JSC NEGU.

The ESIA process did not identify any significant GBV risks that would justify a parallel grievance mechanism to process possible Project related GBV grievances from the community. At this time and GBV grievances that are routed through the Project GM will be addressed following specific steps to be defined in the Project management plans.

As the Project moves into the operation phase, JSC NEGU corporate complaints process will be adopted as the means for raising grievances in the future.

## 7.2 Grievance reporting and resolution

A grievance is a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a Project activity which, if not addressed effectively, may pose a risk to operations and the livelihood, well-being, or quality of life of the claimant(s).

Grievances can be raised during meetings, Project site visits, via phone calls and in written form (text messages via email, mobile applications, written requests etc.). Grievance boxes with grievance forms will also be installed in the following locations:

- Khokimyat Offices in Peshku, Tamdi, Turtkul, Tuprokkala, and Uchkuduk districts.
- At the entrance to the Project temporary work sites.

Upon receiving a grievance by any means of communication, the Grievance Manager will enter the grievance into the grievance log to ensure that all raised concerns/inquiries are investigated and addressed.

After receipt and registration of a grievance, a complainant will receive written notification that includes a proposed timeline for investigation depending on the request and the preliminary time of receipt of a response. Juru has developed a grievance form and log to keep a tracked record of each grievance received. The grievance form is provided in Annex B, and the grievance log is in Annex C.

The grievance form is completed based on the location, language preferences, and communication opportunities of identified stakeholders. Responses will be provided in a language suitable for the complainant, i.e., Uzbek, Russian, Kazakh or Turkmen.

Submitting a grievance through the grievance mechanism will not preclude a complainant in any way from also seeking recourse through the national legal system, and the complainant can take this course of action should they not be satisfied with the response they receive to their grievance if they wish.

## 7.3 Contact details

Contact details of representatives that will be responsible for receipt of grievances during the ESIA stage and the pre-construction stage are provided in Table 5 below:

Table 5: Contact details

Company	Contact Details
<b>Juru</b> Lidia Bakhova – Environmental Consultant	Email: <a href="mailto:l.bakhova@juru.org">l.bakhova@juru.org</a> Phone: +998 (91) 009-16-39
<b>Juru</b> Gulchekhra Nematullaeva – Social Consultant	Email: <a href="mailto:g.nematullaeva@juru.org">g.nematullaeva@juru.org</a> Phone: +998 (97) 445-95-04

<b>NEGU – Project Company (construction)</b> Shuhrat Badalov – Head of Project Implementation Unit (PIU)	Email: <a href="mailto:piu.sarimay.muruntau@gmail.com">piu.sarimay.muruntau@gmail.com</a> Phone: +998 (99) 856-56-92
<b>NEGU – Project Company (operation)</b> <b>(Corporate Relations Department)</b>	Website: <a href="https://www.uzbekistonmet.uz/en">https://www.uzbekistonmet.uz/en</a> Phone: <a href="tel:+998712366035">+998 71-236-6035</a>

It is expected that a Community Liaison Officer will be identified by JSC NEGU. This person will be the main point of contact between the Project and the local communities. Until then the point of contact for JSC NEGU will be the Head of PIU.

#### **7.4 Confidentiality and anonymity**

The grievance mechanism will keep strict data confidentiality, including all complainants' personal information. Although grievances may be reported during the ESIA period, names and identifying features of complainants will be withheld in any public disclosures. At the grievance receipt/registration stage, the complainant will be informed that they can submit a grievance anonymously. Complainants will be informed that some grievances may not be able to be responded to if they are made anonymously.

#### **7.5 Grievance resolution options and response**

The approaches taken to resolve grievances will depend on the nature, frequency of occurrence and the number of grievances. The resolution of grievances will be formally communicated to the complainant in written form. If a complainant cannot receive a written response, the complainant will be contacted via phone and informed of the results of their grievance. Table 6 provides the timeframes for response to grievances.

Table 6: Grievance Processing Timeline

Stage	Timeline
Receipt and registration of grievance	Day 0
Providing acknowledgement of grievance receipt to the complainant	Maximum three days after submission of grievance
Assessment/investigation of the received grievance	Maximum two weeks after submission of grievance
Providing the complainant with a response	Maximum three days after assessment has been completed
Reassessment of grievance in case the complainant is not satisfied with the previously provided response	Maximum two weeks after notification of dissatisfaction by the complainant

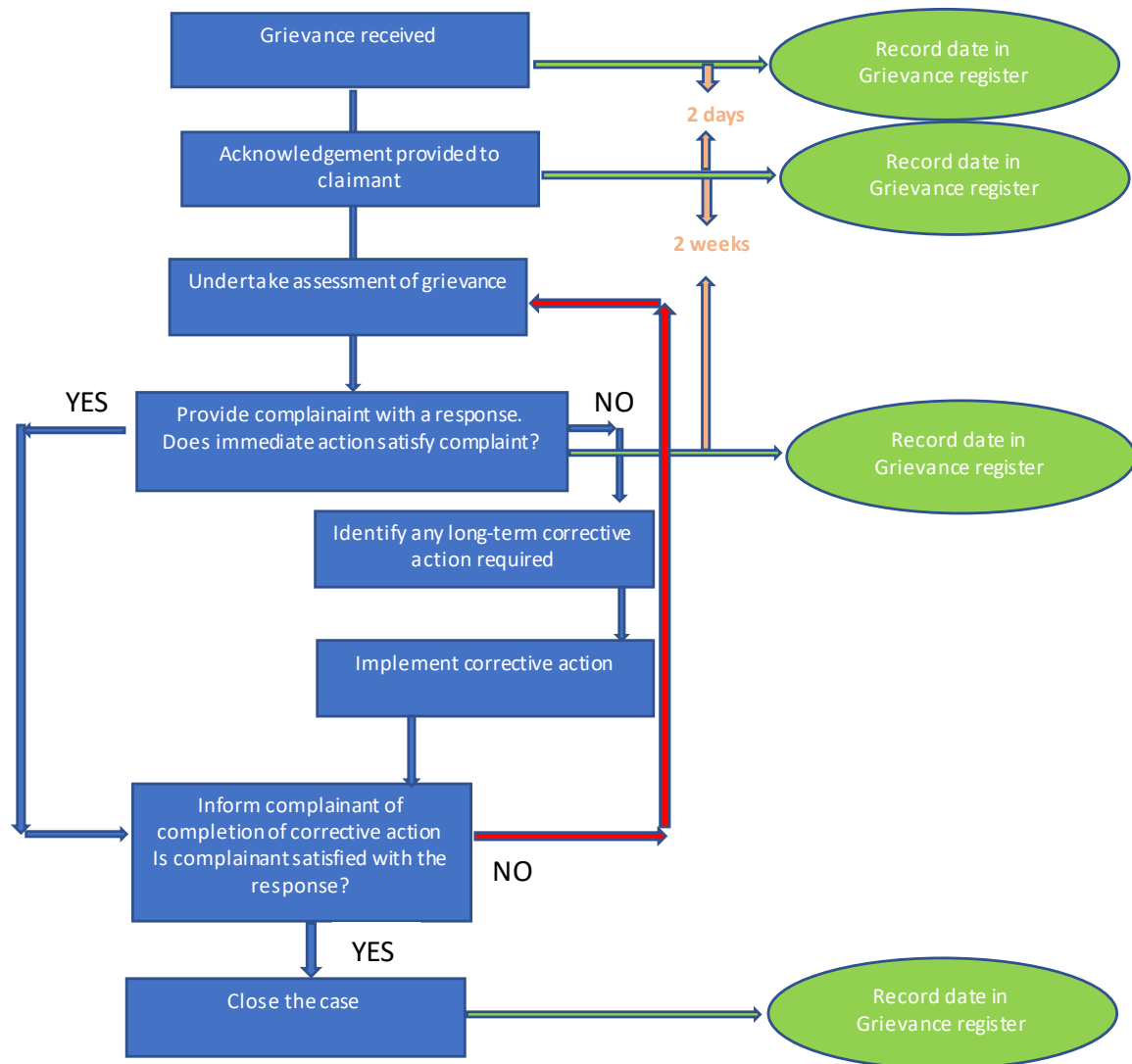
Where complex grievances or other factors are extending the investigation time, the complainant will be informed of this delay, advised of an updated expected timeline for a response, and provided regular updates.

## 7.6 Grievance logging

Tracking and logging each grievance will be recorded in a grievance log. Each grievance will be given a unique identification number, followed by registering details and the timing of its resolution and close-out. A copy of the Project grievance log has been included as Annex C. An overview of the grievance management process is provided in Figure 14.



Figure 14: Grievance Mechanism



## **8 Reporting**

### **8.1 Overview**

Various activities require monitoring and reporting as part of this SEP. They are discussed in the following sections.

### **8.2 SEP reporting**

An SEP is a live document that reflects the changing nature of stakeholder engagement throughout the Project life cycle. It is also an important location to log stakeholder engagement activities that have been undertaken.

This SEP is intended for the ESIA stage only. It will be subject to further amendments during the construction stage to reflect the completion of stakeholder engagement for the ESIA and to include any additional stakeholders identified during the ESIA preparation. The final version of this SEP will be disclosed as part of the ESIA suite of documents.

This SEP will be reviewed and updated for the pre-construction phase (and at each subsequent Project phase, or at least annually) to identify new and different stakeholders and any changes to engagement activities and the grievance mechanism. All future versions of this SEP will also be disclosed to stakeholders.

### **8.3 PIU reporting**

The CLO under the PIU will be responsible throughout the Project life cycle, to undertake and regularly report on stakeholder engagement activities. Reporting by the CLO should include the following:

- A summary of disclosure activities undertaken by the CLO, including meeting minutes, attendance sheets, photographic evidence and copies of advertisements placed in newspapers and other media.
- Minutes of gender-specific consultations and consultations with members of vulnerable groups.
- The originally written correspondence concerning stakeholder engagement, including records of media and social media disclosures. Comments and feedback will also be retained and appended to the SEP.

The CLO will be hired to work on the Project as early as possible in the mobilization phase; they will be expected to report on their activities at least monthly.

### **8.4 Grievance reporting**

Monthly reporting on the status of grievances will need to be prepared by NEGU on an ongoing process during the ESIA phase and throughout the Project life cycle. This is to monitor the timely close out of grievances and grievance satisfaction. All information included in grievance reporting will be anonymised and all personal and identifiable information will be removed.

## **8.5 Annual reporting**

JSC NEGU will prepare annual reporting on the SEP status with the help of the CLO. A Project specific annual report will be prepared to summarise Project performance, CLO activities, including anonymized grievances and updates to the SEP. The first report will be prepared during the construction phase. An external version of this report will also be prepared for disclosure to Affected Communities and implementation of the Project commitments on issues that involve ongoing risks to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern.

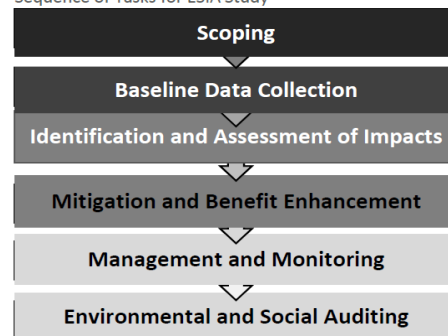
## Annex A: Scoping Project Leaflet

a) English version

### ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA)

The Project is currently in the scoping phase of the ESIA process. Next steps include collecting physical, biological and socio-economic baseline data within the Project site and nearby communities. Potential positive and negative impacts for the construction, operation and decommissioning phases will then be assessed for significance and management and mitigation measures identified to reduce risk to acceptable levels. The ESIA process will:

- Identify actions that can be taken to eliminate, or at least reduce any negative impacts as a result of the Project, to acceptable levels, and enhance Project benefits.
- Confirm that costs are not levied on the public or individuals that are greater than the benefits they will receive.
- Sequence of Tasks for ESIA Study



### SARIMAY-MURUNTAU OHTL INTRODUCTION

The European Bank for Reconstruction and Development (“EBRD”) is considering providing a corporate loan to JSC National Electric Grid of Uzbekistan (“NEGU”) to finance construction of a 230 km 500 kV transmission line between the settlements of Sarimay (Khoesm region) and Muruntau (Navoi region), Uzbekistan (“Project”).

The Project will be implemented by NEGU, a state power company in charge of the country’s transmission network. NEGU is the EBRD’s existing client via sovereign loans for the Uzbekenergo Muruntau Substation, Navoi Transmission Upgrade, and Sarimay-Djankeldy Transmission projects.

This leaflet has been produced to provide information about the basic characteristics of the Project and its surroundings, and how the environmental and social impacts will be assessed and managed.

### PROJECT DESCRIPTION AND LOCATION

The 230 km OHTL starts from the existing Sarimay substation (Khoesm region), which is located close to Sarimay village, to the Mutuntau substation located in Muruntau village (Navoi region) passing close to Uzunkuduk village (Navoi region). The OHTL routes through four regions and five districts:

- Khoesm region (Tuprokkala district)
- Republic of Karakalpakstan (Turtkul district)
- Bukhara region (Peshku district)
- Navoi region (Uchkuduk and Tamdi districts)

The site is accessible from the A379 in the west and A380 in the east, there is an unpaved road along the OHTL route and 4P210 roadway crossing the OHTL route near Uzunkuduk village. It’s a predominantly

desert landscape due to the location in the southwestern part of the Kyzyl-Kum Desert. The Amu Darya River passes close to the western part of the OHTL.

Construction of the Project will consist of the following basic infrastructure components:

- Grounding, foundations and tower installation;
- Insulators and aluminum steel conductor installation;
- Modification of internal access roads and maintenance paths.

The preliminary route and layout are presented in Figures 1&2. Stakeholder engagement shall be undertaken during the preparation of the scoping report and ESIA in accordance with national regulations and good practice. Stakeholder engagement activities will include Project Affected Persons (“PAP”) and communities concerned by the Project e.g., local and traditional leaders, representatives of the communities, land users, potential vulnerable groups such as youth and women.

Figure 1. Sarimay-Muruntau OHTL’s route



Figure 2. Sarimay-Muruntau OHTL’s layout

## CONTACT DETAILS

All complaints, comments or queries relating to the ESIA for the Sarimay-Muruntau OHTL Project should be sent to:

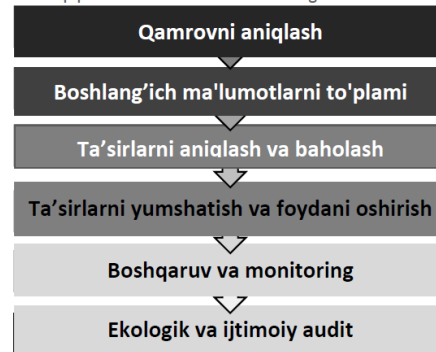
JURU	NEGU
<b>Name:</b> <u>Dostonjon Kuldoshov</u> <b>Address:</b> <u>10A, Chust Str., Tashkent, Uzbekistan, 100077</u> <b>Email:</b> <a href="mailto:srmy-murn-esia@juru.org">srmy-murn-esia@juru.org</a> <b>Phone:</b> +998 (94) 379-87-47	<b>Name:</b> <u>Shuhrat Badalov (Head of Project Implementation Unit)</u> <b>Email:</b> <a href="mailto:piu.sarimay.muruntau@gmail.com">piu.sarimay.muruntau@gmail.com</a> <b>Phone:</b> +998 (99) 856-56-92

b) Uzbek version

**Atrof-muhit va ijtimoiy ta'sirni baholash (AITB)**

Loyiha hozirda AITB jarayonining qamrovini aniqlash bosqichida. Keyingi qadamlar loyiha hududida va yaqin atrofdagi jamoalarda jismoniy, biologik va ijtimoiy-iqtisodiy boshlang'ich ma'lumotlarni to'plashni o'z ichiga oladi. So'ng qurilish, foydalanish va foydalanishdan chiqarish bosqichlari uchun potensial ijobiy va salbiy ta'sirlar baholanadi, xavfni maqbul darajalarga kamaytirish uchun aniqlangan boshqarish va kamaytirish choralari va ahamiyati uchun. AITB jarayoni quyidagilardan iborat:

- Loyiha natijasida yuzaga keladigan salbiy ta'sirlarni maqbul darajaga olib chiqish yoki hech bo'lmaganda kamaytirish va Loyihaning afzalliklarini oshirish uchun amalga oshirilishi mumkin bo'lgan harakatlarni aniqlash.
- Jamoat yoki jismoniy shaxslardan oladigan foydadan kattaroq xarajatlar undirilmasligini tasdiqlang.
- AITB tadqiqoti uchun vazifalar ketma-ketligi



**SARIMOY-MURUNTOV HAVO UZATISH LINIYASIGA KIRISH**

Yevropa tiklanish va taraqqiyot banki ("YTTB") Sarimay (Xorazm viloyati) va Muruntov (Navoiy viloyati) aholi punktlari o'rtasida 230 kmlik 500 kV havo elektr uzatish liniyasi qurilishini moliyalashtirish uchun "O'zbekiston milliy elektr tarmoqlari" AJ ga korporativ kredit ajratish imkoniyatini ko'rib chiqmoqda.

Loyiha mamlakat elektr uzatish tarmog'iga mas'ul bo'lgan "O'zbekiston milliy elektr tarmoqlari" AJ davlat energetika kompaniyasi tomonidan amalga oshiriladi. "O'zbekiston milliy elektr tarmoqlari" AJ YTTBning "O'zbekenergo Muruntov" nimstansiyasi, Navoiy elektr uzatish tarmog'ini yangilash va Sarimoy-Jonkeldi elektr uzatish loyihalari uchun suveren kreditlar bo'yicha mavjud mijozidir.

Ushbu broshura Loyihaning asosiy xususiyatlari va uning atrofidagi ma'lumotlar, atrof-muhit va ijtimoiy ta'sirlar qanday baholanishi va boshqarilishi haqida ma'lumot berish uchun ishlab chiqilgan.

**LOYIHA TAVSIFI VA JOYLASHUVI**

230 km uzunlikdagi havo uzatish liniyasi Sarimoy qishlog'iga yaqin joylashgan mavjud Sarimoy podstansiyasidan (Xorazm viloyati) Muruntov qishlog'ida joylashgan Mutuntau podstansiyasigacha (Navoiy viloyati) cho'ziladi va Uzunquduq qishlog'i (Navoiy viloyati) yaqinidan o'tadi. Havo uzatish liniyasi to'rtta viloyat va beshta tumandan o'tadi:

- Xorazm viloyati (Tuprokkala tumani)
- Qoraqalpog'iston Respublikasi (To'rtko'l tumani)
- Buxoro viloyati (Peshku tumani)
- Navoiy viloyati (Uchquduq va Tomdi tumanlari)

Ushbu maydonga g'arbda A379 va sharqda A380 dan kirish mumkin, asfaltlanmagan yo'l va Uzunquduq qishlog'i yaqinida havo uzatish

liniyasini kesib o'tuvchi 4P210 yo'li bor. Qizilqum cho'lining janubi-g'arbiy qismida joylashganligi sababli u asosan cho'l landshaftidir. Amudaryo havo uzatish liniyasining g'arbiy qismiga yaqin joyda o'tadi.

Loyihaning qurilishi quyidagi asosiy infratuzilma komponentlaridan iborat bo'ladi:

- Grounding, poydevor va minora o'rnatish;
  - izolyatorlar va alyuminiy po'lat o'tkazgichlarni o'rnatish;
  - ichki kirish yo'llari va texnik xizmat ko'rsatish yo'llarini o'zgartirish.
- Dastlabki marshrut va sxema 1 va 2-rasmlarda keltirilgan. Manfaaddor tomonlarning ishtiroki milliy qoidalar va ilg'or amaliyotga muvofiq qamrovni aniqlash hisoboti va AITBni tayyorlash jarayonida amalga oshiriladi. Manfaaddor tomonlarni jalb qilish tadbirlari Loyiha ta'siri ostidagi shaxslar va Loyihadan manfaaddor jamoalarni, masalan, mahalliy va an'anaviy rahbarlar, jamoalar vakillari, yerdan foydalanuvchilar, yoshlar va ayollar kabi potentsial zaif guruhlarni o'z ichiga oladi.

1-rasm. Sarimoy-Muruntov havo uzatish liniyasi yo'nalishi



2-rasm. Sarimoy-Muruntov havo uzatish liniyasi joylashuvi

## BOG'LANISH UCHUN

Sarimay-Muruntov havo uzatish liniyasi loyihasi uchun AITBga tegishli barcha shikoyatlar, sharhlar yoki so'rovlar quyidagi manzilga yuborilishi kerak:

<p><b>JURU ENERGY CONSULTING MCHJ</b></p> <p><b>Ismi:</b> Dostonjon Kuldoshov  <b>Manzil:</b> 10A, Chust Str., Tashkent, Uzbekistan, 100077  <b>Email:</b> <a href="mailto:srmy-murn-esia@juru.org">srmy-murn-esia@juru.org</a>  <b>Tel:</b> +998 (94) 379-87-47</p>	<p><b>NEGU</b></p> <p><b>Ismi:</b> Shuhrat Badalov (Head of Project Implementation Unit)  <b>Email:</b> <a href="mailto:piu.sarimay.muruntau@gmail.com">piu.sarimay.muruntau@gmail.com</a>  <b>Tel:</b> +998 (99) 856-56-92</p>
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## Annex B: Grievance form

a) English version

<b><u>SARIMAY-MURUNTAU OHTL GRIEVANCE FORM</u></b>	
<i>To be used for grievance(s) comments, suggestions, or/and inquires or any other matters</i>	
Reference number	<i>(to be filled in by Juru representative)</i> REF:
INSTRUCTIONS	<p>Please fill in this Grievance form in clear handwriting and submit through one of the following means:</p> <ul style="list-style-type: none"> <li>- Directly to Juru</li> <li>- By email to:                             <ul style="list-style-type: none"> <li><a href="mailto:g.nematullaeva@juru.org">g.nematullaeva@juru.org</a></li> <li><a href="mailto:l.bakhova@juru.org">l.bakhova@juru.org</a></li> </ul> </li> <li>- Phone Number:                             <ul style="list-style-type: none"> <li>+998 97 445 95 04</li> <li>+998 91 009 16 39</li> </ul> </li> </ul>
Full Name	First Name:
	Last Name:
	<input type="checkbox"/> I wish to raise my grievance anonymously <i>(You can remain anonymous if you prefer but we may not be able to contact you with a response to your concern)</i>
	<input type="checkbox"/> I wish to raise my grievance confidentially <i>(You can remain confidential in all reporting if you prefer)</i>
Contact Information  Please mark how you wish to be contacted (mail, telephone, e- mail)	<input type="checkbox"/> By Post: <i>Please provide:</i>
	<input type="checkbox"/> By telephone: <i>Please provide:</i>
	<input type="checkbox"/> By email: <i>Please provide:</i>
Preferred Language of Communication	<input type="checkbox"/> Uzbek
	<input type="checkbox"/> Russian



	<input type="checkbox"/> Turkmen		
	<input type="checkbox"/> Kazakh		
	<input type="checkbox"/> English		
<p>Description of Incident/Grievance</p> <p><i>What happened?</i></p> <p><i>Where did it happen?</i></p> <p><i>Who did it happen to?</i></p> <p><i>What is the result of the problem?</i></p>			
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (date...)		
	<input type="checkbox"/> Happened more than once (how many times?)		
	<input type="checkbox"/> Ongoing (currently experiencing problem)		
What would you like to see happen to resolve the problem?			
Signature:		Date:	

b) Uzbek version

<b>SHIKOYAT MUROJAATNOMASI SHAKLI</b>	
<i>Izohlar, takliflar yoki/va yoki boshqa masalalarni ko'tarish uchun foydalanilmaydi</i>	
YO'RIQNOMA	<p>Iltilmos, ushbu shikoyat murojaati shaklini aniq yozuvda to'ldiring va quyidagi aloqa vositalari orqali taqdim eting:</p> <ul style="list-style-type: none"> <li>- To'g'ridan-to'g'ri Juru ga</li> <li>- Elektron manzil orqali: <a href="mailto:g.nematullaeva@juru.org">g.nematullaeva@juru.org</a> <a href="mailto:l.bakhova@juru.org">l.bakhova@juru.org</a></li> <li>- Telefon orqali: +998 97 445 95 04 +998 91 009 16 39</li> </ul>
F.I.Sh	Ismi:
	Familiyasi:
	<input type="checkbox"/> Murojaatimni anonim tarzda bo'lishini istayman. (Hohishingizga ko'ra anonim tarzda murojaat qilishingiz mumkin, ammo u holda masalangiz yuzasidan sizga javob bilan murojaat qila olmaymiz )
Aloqa ma'lumotlari	<input type="checkbox"/> Pochta orqali: <i>Iltilmos, manzilni ko'rsating:</i>
Murojaatga javob olish shaklini ko'rsating (pochta, telefon, e-mail).	<input type="checkbox"/> Telefon orqali: <i>Iltilmos, manzilni ko'rsating:</i>
	<input type="checkbox"/> Email orqali: <i>Iltilmos, manzilni ko'rsating:</i>
Afzal ko'riladigan aloqa tili	<input type="checkbox"/> O'zbek
	<input type="checkbox"/> Rus
	<input type="checkbox"/> Turkman
	<input type="checkbox"/> Qozoq
	<input type="checkbox"/> Ingliz
<b>Murojaat/shikoyat mazmuni</b>	

<p><i>Nima sodir bo'ldi?</i></p> <p><i>Qayerda?</i></p> <p><i>Kim buni boshidan o'tkazdi?</i></p> <p><i>Natijada nima sodir bo'ldi?</i></p>			
<p>Murojaat/shikoyat sanasi</p>	<p><input type="checkbox"/> Bir martalik murojaat/shikoyat (sana _____)</p> <p><input type="checkbox"/> Bir necha marta yuborilgan murojaat/shikoyat (necha marotaba _____)</p> <p><input type="checkbox"/> Davom etayotgan (ayni paytda yechimi topilayotgan murojaat)</p>		
<p>Muammoni hal qilish uchun qanday choratadbirlar qo'llanishini xohlaysiz?</p>			
<p>Imzo:</p>		<p>Sana:</p>	

## Annex C: Project Grievance Log (template)

ID	Date	Name of Grievant	Contact Details	Preferred Language	Requested Anonymity?	Description of the problem	Responsible Person	Acknowledgement date	Actions to be undertaken	Due date	Results of the Actions	Closing date	Evidence (if applicable)	Evidence of acceptance by Complainant