



Stakeholder Engagement Plan for 35kV Skhalta-Shuakhevi Overhead Transmission Line

December, 2016

Rev C

Adjaristsqali Georgia LLC

Issue and Revision Record

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Acronyms and Abbreviations

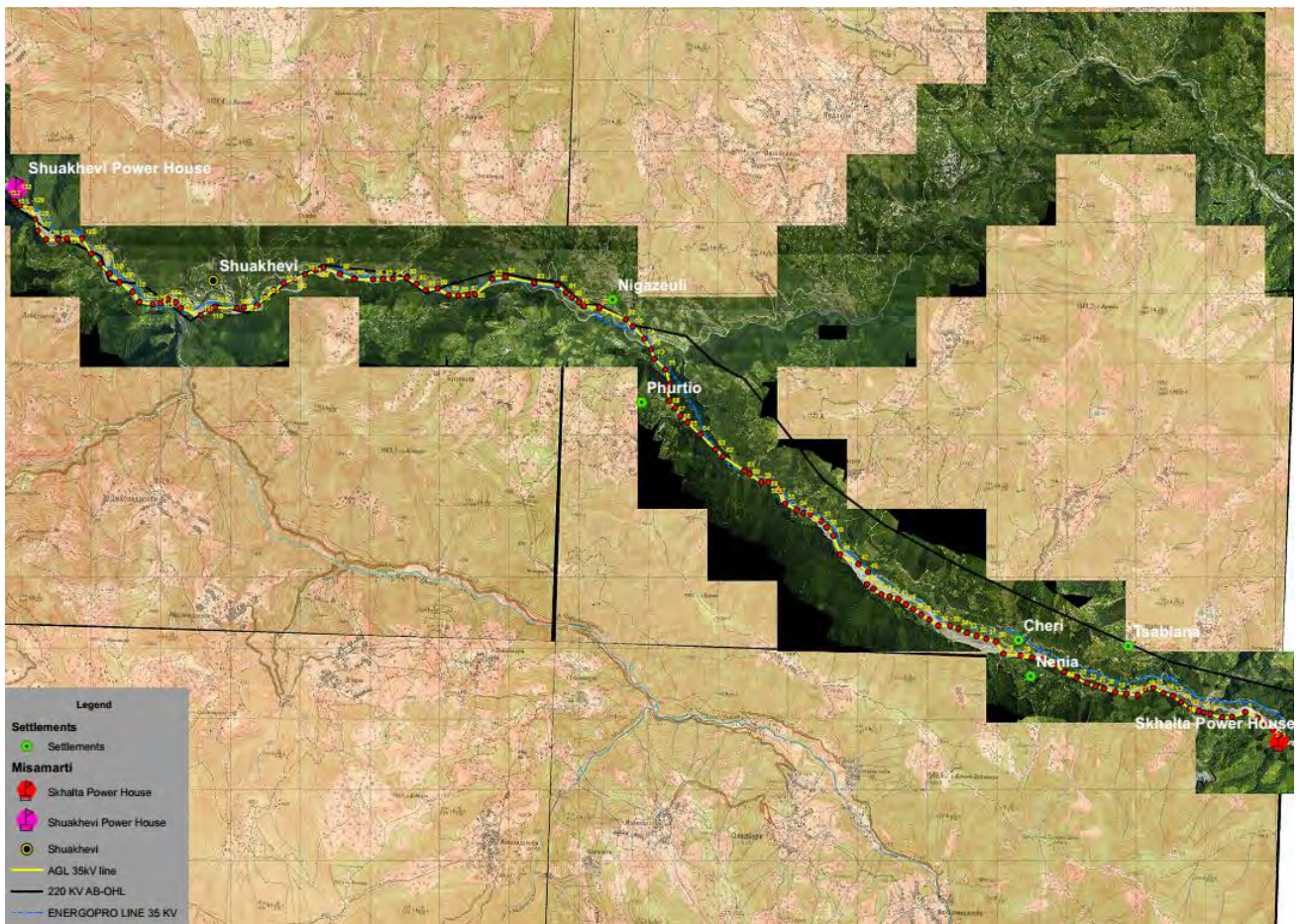
AGL	Adjaristsqali Georgia LLC
NMG	New Metal Georgia
SEP	Stakeholder Engagement Plan
EIA	Environment Impact Assessment
ESIA	Environment and Social Impact Assessment
GSE	Georgian State Electrosystem
OHL	Overhead Transmission Line
IFC	International Finance Corporation
EBRD	European Bank for Reconstruction and Development
ADB	Asian Development Bank
MW	Mega Watt
kV	Kilovolt
PAP	Project Affected Person
HPP	Hydro Power Project
EHS	Environment, Health and Safety
CLO	Community Liaison Officer

1. Project Description

The 35kV Skhalta-Shuakhevi Overhead Transmission Line (OHL) (hereinafter referred to as “the Project”) represents an around 22.3 km, 35kV, single circuit overhead power line to be constructed between two separate hydropower stations (Shuakhevi HPP and Skhalta HPP) to be built under the scope of the Shuakhevi hydropower station (with a design capacity of 187MW) (see Figure 1). The line will allow the project to evacuate power from the Skhalta HPP to the Georgian transmission line network. Part of the generated electricity will be sold in Turkey and the rest will be used to meet the winter energy deficit in the Georgian electric network as per the Build-Own-Operate Agreement signed with Government of Georgia.

The Shuakhevi Hydropower plant (HPP) is located in the vicinity of Shuakhevi town - at the upper part of the Adjarisqali and Chvanisqali rivers’ flow, and the Skhalta HPP is located on the Skhalta River. The Shuakhevi HPP Project is planned in Georgia, in the Adjara region, on the territories of the Shuakhevi and Khulo municipalities. The Shuakhevi HPP Project is developed under the policy frameworks of Government of Georgia aimed at reaching economic independence and sustainability of power supply and providing energy security through internal power generation. The electric power is considered as an export product by Georgia due to its well-connected transmission network with other countries and the Government of Georgia is planning to develop hydroelectric power potential.

Figure 1 Project layout map



This document forms a separate document prepared in line with the Stakeholder Engagement Plan (SEP) rev G of the Shuakhevi HPP Project (available at <http://agl.com.ge/uploads/media/SEP-G-Revision-Final-07-July-2016.pdf>). This SEP will guide stakeholder engagement throughout the life of the project and will cover the construction and operation regimes of the transmission line. The Skhalta-Shuakhevi 35 kV OHL will be constructed by New Metal Georgia LLC (NMG), as a Contractor, with Adjaristsqali Georgia LLC being the developer and owner of the Project. Within the framework of the Project, land acquisition and livelihood restoration plan development has been assigned by the Contractor to Tbilisi-based consulting company ACT.

The SEP for the construction phase will be implemented by AGL, ACT and NMG, while for the operation phase, AGL will be in charge of implementing the SEP.

2 Regulations and requirements

2.1 Overview

As part of AGL's on-going commitment to good corporate governance and to communicating with the project stakeholders, this SEP is designed to meet international best practices and the laws of Georgia. Georgia has signed and ratified the United Nations Economic Commission for Europe's Aarhus Convention, which relates to access to information, public participation in decision-making, and public access to justice in relation to the environment. Therefore, the laws of Georgia are broadly aligned with the lenders' stakeholder engagement requirements.

2.2 Georgian requirements

The Constitution of Georgia guarantees public access to information and states the right of an individual to obtain full, unbiased and timely information regarding his/her working and living environment. The environmental permitting system is governed by the Law of Georgia on Environmental Impact Permit (2007); Law of Georgia on Protection of Environment (enacted 1996, amended 2000, 2003, 2007); Law of Georgia on Licenses and Permits (2005); and Law of Georgia on Ecological Expertise (2007). Public participation in project development is regulated under the Law on Environmental Impact Permit (2007). Under the Law, the project developer is required to prepare an EIA and is responsible for public engagement, which includes making public disclosure of the document in both central and local media. The law states that public participation and provision of access to information are obligatory procedures of the environmental permitting process. This is conducted in the form of a public discussion of the proposed activity with participation by the investor, the Ministry of Environment and Natural Resources Protection and local administrative authorities.

2.3 International Finance Corporation (IFC) requirements

Public consultation, disclosure and stakeholder engagement are key requirements of the IFC's Policy on Social and Environmental Sustainability (2012) embodied within the Performance Standards (PS). The requirements for stakeholder engagement in projects are:

- Start as early as possible in the project cycle;
- Continue throughout the life of the project;
- Be free of external manipulation, interference, coercion, or intimidation;
- Where applicable enable meaningful community participation; and
- Be conducted on the basis of timely, relevant, understandable, and accessible information in a culturally appropriate format.

IFC seeks to provide accurate and timely information regarding its investment and advisory activities as well as more general institutional information in accordance with its Access to Information Policy. IFC's Access to Information Policy states that for all Category A projects (this project is a sub-component to the Shuakhevi HPP Project that is Category A), a summary of its review findings and recommendations will be disclosed and include as a minimum the following information:

- Reference to the performance standards and any applicable grievance mechanisms, including the compliance advisor/ombudsman;
- The rationale for IFC's categorization of the project;
- A description of the main social and environmental risks and impacts of the project;
- Key measures identified to mitigate those risks and impacts, specifying any supplemental measures and actions that will need to be implemented to undertake the project in a manner consistent with the Performance Standards.
- Electronic copies or weblinks to any relevant environmental and social impact assessment (ESIA) prepared by the developer
- Any additional documents such as Action Plans, Stakeholder engagement plans, Resettlement action plans, etc.

Published project or investment information will be disclosed through their Disclosure Portal at <http://www.ifc.org/disclosure>.

2.4 European Bank for Reconstruction and Development (EBRD) requirements

The Environmental and Social Policy (2008) and Public Information Policy (2008) documents outline EBRD's key policies with regards to information disclosure and stakeholder engagement. Similar to IFC requirements, EBRD requires the project sponsor to provide the public, including NGOs, with information about the project during scoping stage and to prepare an SEP. The 2008 EBRD policy requires project sponsors to engage with stakeholders from the earliest stages of the project throughout the life of the project. Stakeholder engagement must be open, meaningful, and in an appropriate manner acceptable to the potentially affected communities. The engagement program must actively address the needs of vulnerable populations who may be affected by the project. The ESIA documents must remain in the public domain for the life of the project, and if changes to project plans are necessary, these have to be made public as well.

EBRD's Public Information Disclosure Policy requires ESIA documents to be available through their Business Information Centre and resident offices as well as their website.

2.6 Asian Development Bank requirements

ADB has similar requirements to EBRD and IFC with regards to consultation and disclosure for category A projects (this project is a sub-component to the Category A Shuakhevi HPP). The ADB's 2011 Public Communication Policy outlines the need to disclose impact assessment results and allow stakeholders to provide comments during a disclosure period. The Policy supports the right of people to seek, receive, and impart information and ideas about ADB-assisted activities. Through the Policy, ADB seeks to provide information in a timely, clear, and relevant manner and to share information with project-affected people early enough to allow them to provide meaningful inputs into project design. The requirements are reaffirmed in the ADB's Safeguard Policy Statement (SPS) of 2009, which defines 'meaningful consultation in the following way:

A process that:

- (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle;
- (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people;
- (iii) is undertaken in an atmosphere free of intimidation or coercion;
- (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and
- (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

Within the SPS, Safeguard Requirements 1-3: states that the borrower/client will carry out meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation in Project development.

3. Initial Stakeholder Engagement

AGL is committed to engaging stakeholders early in the development process to encourage their support and input in pursuit of improved outcomes and long-term sustainability.

AGL has been conducting stakeholder engagement activities in the area as part of the framework SEP for the Shuakhevi HPP Project since 2011. Activities under this SEP will be implemented following the principles of the framework of SEP rev G (available on AGL website at <http://agl.com.ge/uploads/media/SEP-G-Revision-Final-07-July-2016.pdf>). This section describes the information disclosure, consultation and participation activities already undertaken in relation to the 35kV OHL project component.

Following the award of the tender to New Metal Georgia (NMG) for undertaking the construction works for the 35kV Skhalta-Shuakhevi Transmission Line, NMG together with its sub-contractor company ACT and with support of AGL commenced informational meetings with affected communities. Totally 9 informational meetings were conducted where representatives from 13 affected villages participated. Table 1 below shows the meetings conducted, and also key issues raised during these meetings.

The objectives of the informational meetings were to:

- Inform the proposed development of the project to local communities and municipality officials both from Khulo and Shuakhevi
- Engage affected communities by introducing the project design, land acquisition and ESIA process for 35kV line Transmission Project and inviting the participants to comment and provide feedback;
- Identify additional potential and key stakeholders
- Identify concerns and opportunities to be addressed by the feasibility study and ESIA process
- Provide stakeholders with points of contact to address further concerns

The meetings were held in both affected municipalities where representatives of ACT and NMG presented the project in detail and also gave information about the land acquisition procedures, grievance mechanism and answered all queries from the public. The meetings were attended by the heads of affected communities, affected persons. A list of attendees is included in Appendix B within the Minutes of Meetings.¹ AGL land team and social officers, Expert 21 a Company which was assigned a role of valuations of land, tree, and crops attended these meetings.

During the meetings ACT distributed brochures on land acquisition procedures (See Appendix A). The content of the brochures was agreed and approved by AGL. The main concerns raised during the meetings were related to the impact of radiation from the transmission line. NMG explained that overhead transmission lines do not have radiation as the electricity is pure. It has only a magnetic field which does not exceed a 2 meter radius, and while installing towers safety standards will be maintained. Some of the affected persons addressed AGL land officers to purchase the entire area and not only the affected portion of the land as they believe that after the construction the remaining part becomes useless. Meeting participants were told that AGL will purchase those land plots which are needed for the construction of the transmission lines. As for land plots under transmission lines, there will be a clearance zone of 20m and a buffer zone of 40m. Servitude agreements will be made with land users and owners both for the clearance and buffer zones. Servitude means restriction on land usage such as for planting tree taller than 4m, and building construction. Otherwise there are no limitations to use the land as they desire.

Table 1 below summaries meetings conducted and answers provided.

Table 1 Summary of meetings conducted.

Date	Meeting Venue	Representatives/ Presented Villages	N of participant	Key comments/questions raised	Responses
Apr 13, 2016	Zamleti administrative unit, Shuakhevi	Representative of Zamleti administrative unit in Shuakhevi, representative of Shuakhevi Mayor in	34	General informational meeting with the owners/users of the needed land parcels	NMG together with AGL land officer explained the procedure for land plot acquisition, namely that all land parcels and fruit bearing trees will be valued and market prices

¹ Appendix B provides Minutes of 4 Meetings prepared in the English language. As for MoM for other meetings they are in Georgian and available upon request.

Date	Meeting Venue	Representatives/ Presented Villages	N of participant	Key comments/questions raised	Responses
		Shuakhevi administrative unit, local land owners/users			identified. AGL will compensate both for registered and non-registered land plots.
Apr 13, 2016	Skhalta administrative unit, Khulo	Representative of Khulo Mayor in Skhalta administrative unit, landowners/users.	23	General informational meeting with the owners/users of the needed land parcels	NMG together with AGL land officer explained the procedure for land plot acquisition, namely that all land parcels and fruit bearing trees will be valued and market prices identified. AGL will compensate both for registered and non-registered land plots.
Apr 15, 2016	Shuakhevi administrative unit, Shuakhevi	Representatives of Shuakhevi Mayor and Zamleti administrative units, local land owners/users	40	The participants discussed identification of affected land parcels in Dabadzveli, Chanchkhalo and Daba Shuakhevi.	Initiative group was created with the participation of local residents (Irakli Davitadze, Paata Davitadze) which assisted NMG to identify land parcels and owners in the mentioned villages.
Apr 15, 2016	Skhalta administrative unit, Khulo	Representative of Khulo Mayor in Skhalta administrative unit, landowners/users.	26	General informational meeting with the owners/users of the needed land parcels	Initiative group was created with the participation of local residents (Dariko Tsetsckhladze, Temur Vashakmadze) which assisted NMG to identify land parcels and owners in Kinchauri village.
Apr 16, 2016	Skhalta administrative unit, Khulo	Representative of Khulo Mayor in Skhalta administrative unit, local landowners/users.	18	General informational meeting with the owners/users of the needed land parcels	Initiative group was created with the participation of local residents (Beglar Shainidze, Bezhan Shainidze) which assisted NMG to identify land parcels and owners in Tsublana villages.
May 17, 2016	Shuakhevi administration building	Nenia, Dabadzveli, Shuakhevi center, Purtio, Chanchkhalo, Nigazeuli, Okropilauri	57	Land compensation; type of contracts signed with landowners/users; restrictions on tree planting; privileges on electricity tariff.	ACT with Expert 21 and AGL land officer explained how the land acquisition will be conducted, that compensation will be paid for registered as well as for non-registered land plots, two types of contracts will be signed one - land purchase and the other – servitude; AHS will have restrictions to plant 4 m and higher tree but they can have small tree or even crops under the lines. As for the privilege on electricity rate, this is GoG's call and private company cannot interfere in it.
May 28, 2016	Skhalta Museum building	Kinchauri, Cheri, Dzmagula	23	Tree compensation; project design and route, impact of transmission line on health (radiation)	All fruit bearing trees will be compensated, as for non-fruit bearing trees which stands on your land plots belongs to the municipality. According to the law the Company is obliged to deliver the chopped tree to the local municipality. Transmission lines do not have radiation and safety zone during construction will be followed.

Date	Meeting Venue	Representatives/ Presented Villages	N of participant	Key comments/questions raised	Responses
May 28, 2016	Tsablana public school	Tsablana villagers	19	Impact of the Project on agriculture; compensation for non-fruit bearing trees; employment	The project cannot have impact on agricultural product and the electricity is pure and does not have emission which can influence the agriculture. If
June 8, 2016	Shuakhevi Administration building	Beselashvilebi villagers	12	Land compensation; land registration; project route and technical details	Both land owners and user will be compensated, if land user has an archive document than the land will be registered on his name and after that purchased by AGL, if land user fails to provide such document than the land will be registered on State though land user still receives the compensation. Project route was selected in such a way that has less environmental and social impact. Namely, it avoids residential houses, agricultural land plots, forest area and impact on biodiversity is less. The construction of the transmission line does not require physical relocation of households. There will be only economic displacement and temporary restriction of land use leading to crop and fruit tree loss. 110kV transmission towers will be used for the project, this reduces the number of towers and at the same time impact on land.

On July 14, 2016 the Public Consultations (hearings) on the 35kV OHL EIA were held in Khulo Municipality at 13.00 and Shuakhevi municipality at 16.00. The meetings were opened by the NMG Director Mr. David Mzhavanadze who talked about the project scheme and goals, introduced technical details, environmental policy and principles; he briefly described the EIA structure, potential impacts on the natural and social environment and relevant mitigation measures. Then he invited attendees for comments and questions. Any comments or questions raised by stakeholders were responded by NMG and recorded. A number of key themes were brought up; these included different type of towers to be selected for erection, whether chopped trees could be delivered to communities, land compensation, etc. Representatives of the affected communities, municipality public officers, a representative from the Ministry of Environment and Natural Resources Protection, and AGL community officer attended the meetings. All comments and questions were collected and used to produce minutes of meetings which were submitted to the Ministry of Environment and Natural Resources Protection as a part of the EIA².

Information about the date and venue of the public consultations on the 35kV line EIA was published in central newspaper (Sakartvelos Respublika - Georgian Republic). Hard and soft copies of the EIA, technical and non-technical summary were available at the administrations of Khulo and Shuakhevi municipalities 50 days prior

² MoMs of the public hearings are available in Georgian language.

to public consultations. In addition, public announcements were published on information boards of the both municipalities.

4. Stakeholder Identification and Analysis

Stakeholders are persons or groups who are directly or indirectly affected by a project as well as those who may have interests in a project or the ability to influence its outcome, either positively or negatively.

AGL ensures that stakeholders are well informed about the project throughout its implementation lifecycle. Stakeholders have the opportunity to express their opinion about the Project, including complaints. The names of specific stakeholder bodies under each of these groups and their relevance to the Project are presented in Table 2 below.

Table 2 Internal and External Stakeholder Groups

Stakeholder Groups	Stakeholder Bodies	Relevance to the Project	Communication Tool	Frequency
Internal Stakeholders				
Project construction employees	National NGOs and local employees	Will benefit from employment opportunities but also face potential health and safety risks and labour rights violations. National NGOs will safeguard the welfare and rights of workers.	Public meetings Private meetings Disclosure of written information Site visits	Monthly
Temporary workers			Public meetings Private meetings Disclosure of written information	Monthly
External Stakeholders				
Local Project Affected Communities – Khulo Municipality	Tsablana, Kinchauli, Skhalta, Tcheri	Local communities may be adversely affected by construction and operational impacts but also may benefit from employment and indirect economic opportunities.	Public meetings Disclosure of written information / Letters Information Centers	Daily Weekly Monthly
Local Project Affected Communities- Shuakhevi Municipality	Nigazeuli, Dabadzveli, Purtio, Nenia, Okropirauli, Chanchkhalo, Shuakehvi		Focus Groups Mass media communication Community liaison	

Stakeholder Groups	Stakeholder Bodies	Relevance to the Project	Communication Tool	Frequency
Physically and economically displaced Project Affected People (PAPs)	Landowners within the project area and those living in the areas where access roads, towers will be located Landowners within the project area that may be affected by the transmission line.	Entitled to compensation for land acquired in accordance with the Addendum to the Land Acquisition and Livelihood Restoration Plans (LALRP).	Public meetings Private meetings and workshops Disclosure of written information /Letters Information Centres Focus Groups Mass media communication Community liaison	Daily Weekly Monthly
International Financial Institutions	International Finance Corporation, European bank for Reconstruction and Development, Asian Development Bank	Financiers and regulators	Meetings Site visits E-mails Conference calls Website	Monthly
National Government Departments	Ministry of Energy	Meeting the requirements of country's energy policy during the implementation of the planned activities	Public meetings Private meetings E-mails Letters / Disclosure of written information Phone calls	Monthly Weekly
	Ministry of Environment and Natural Resources Protection	Meeting the requirements of Environmental Law of Georgia and International Environmental standards during the	Public meetings Private meetings E-mails Letters / Disclosure of written information	Monthly Weekly

Stakeholder Groups	Stakeholder Bodies	Relevance to the Project	Communication Tool	Frequency
		implementation of the planned activities	Phone calls	
	Georgian State Electrosystem	Meeting the requirement for the connectivity to the grid	Public meetings Private meetings E-mails Letters / Disclosure of written information Phone calls	Monthly
	Administration of Khulo Municipality	Expectations for improvement of socio-economic conditions of the municipality. Meeting the requirements for the construction permit	Public meetings Private meetings E-mails Letters / Disclosure of written information Phone calls	Monthly Weekly
	Administration of Shuakhevi Municipality	Expectations for improvement of socio-economic conditions of the municipality. Meeting the requirements for the construction permit	Public meetings Private meetings E-mails Letters / Disclosure of written information Phone calls	Monthly Weekly
Industry & Business	Energopro Georgia	The transmission line pylons may be relocated before the start of construction	Meetings Letters / Disclosure of written information Calls E-mails	When needed
Civil Society, NGO's, Research Bodies	Greens Movement of Georgia / Friends of Earth	Protection of rights of residents of the local communities and the environment during	Information meetings Workshops	Quarterly

Stakeholder Groups	Stakeholder Bodies	Relevance to the Project	Communication Tool	Frequency
	<p>Green Alternative Georgian Young Lawyers Association Batumi Office</p> <p>Transparency International, Batumi Office</p> <p>Union of Young Scientists "Intellect"</p> <p>Free Journalists House</p> <p>Institute of Democracy</p> <p>Environmental Association "Psovi"</p> <p>Flora & Fauna Association Mta-Bari</p>	the project implementation	<p>Letters</p> <p>Disclosure of written information</p> <p>E-mails</p> <p>Calls</p>	
Media & Press	<p>Television of Adjara</p> <p>Newspaper Batumelebi</p> <p>Television TV25</p> <p>Radio "Adjara"</p> <p>Newspaper "Adjara"</p> <p>Newspaper "Shuakhevi"</p> <p>Newspaper "Khulo"</p>	Informing residents living in the Ajara region and the project affected area about the planned activities.	<p>Public meetings</p> <p>Mass Media communication</p>	Monthly

5. Stakeholder Engagement Program

AGL will ensure that stakeholders are well informed about the Project throughout its lifecycle. Stakeholders will have the opportunity to express their opinion, including complaints, about the project activities. Table 3 below shows the information to be disclosed to stakeholders and authorities and the methods for communication. The delivery of information will meet all applicable legal requirements of Georgia.

Table 3 Public Consultation and Disclosure Programme

Information to be disclosed	Timeframe	Communication/media tool	Opportunity for stakeholder comment	Frequency
Internal Stakeholder Engagement				
Workers' grievance mechanism	From the commencement of Project activities	Bulletin board in break room, tool box talks, induction information when new groups of workers commence work on the Project	Workers (including non-employees) can lodge grievances at any time throughout their employment on the Project	Weekly
Employment terms and conditions	From the commencement of Project activities	Included in contracts	Through staff grievance mechanism	Monthly
Human resources and Environment, Health and Safety (EHS) policies and procedures	From the commencement of Project activities	Included in contracts	Through staff grievance mechanism	Monthly
External Stakeholder Engagement				
Project schedules provided to directly affected stakeholders to notify them in advance of construction works. Inform them about planned livelihood restoration activities and CSR program	Prior to start of construction works During the construction and operation phases	Signposts at Project locations; Leaflets; Community Liaison Officer to submit to relevant municipalities, local authorities, and inspection authorities website: www.agl.com.ge	During the planning, construction and operation phases through communication exchange and public grievance mechanism	Monthly
Project progress, performance on environmental and social issue management, and new activities	Monthly as soon as the construction permit is obtained	Monthly progress Reports, Press releases Personal communication on specific issues for relevant stakeholders Community Liaison Officer Public Information Centers Website: www.agl.com.ge	During the construction and operation phases through communication exchange and public grievance mechanism	Monthly

Information to be disclosed	Timeframe	Communication/media tool	Opportunity for stakeholder comment	Frequency
Public grievance mechanism	From the commencement of Project activities	Community Liaison Officer Website: www.agl.com.ge	Public can lodge grievances any time throughout the lifecycle of the Project	Weekly

Information disclosure will be extended through the Public Informational Centres set up by AGL in Shuakhevi, Khulo and Skhalta. AGL community and land offers have daily interaction with affected villages and provide all information related to construction works, also record grievances, and are directly engaged in social projects implemented by AGL.

6. Grievance Mechanism and Company Contact Information

A grievance can be defined as an actual or perceived problem that might give grounds for complaint. As a general policy, AGL will work proactively towards preventing grievances through the implementation of impact mitigation measures and community liaison. These activities are designed to anticipate and address potential issues before they become grievances. This will be the responsibility of the Director of Land and Social Issues and the AGL Community Liaison Officer (CLO).

Anyone will be able to submit a grievance to the Project if they believe a practice is having a detrimental impact on the community, the environment, or on their quality of life. They may also submit comments and suggestions.

Any comments or concerns can be brought to the attention of the company verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on the Project website (www.agl.com.ge) alongside a description of the grievance mechanism. Grievance forms can then be submitted to the company representative whose contact details are provided below.

All grievances will be acknowledged within 10 days. If immediate corrective action is available it will be taken within 10 days; if no immediate corrective action is available, a response will be provided within 21 days. The response to a comment will be provided within twenty-one working days, unless there are exceptional circumstances. Grievances during construction will be categorized based on validity and risk level by AGL and their CLO. Where investigations are required, project staff and outside authorities as appropriate, will assist with the process. The CLO will collaborate with the AGL to identify an appropriate investigation team with the correct skills to review the issue raised and to decide whether it is Project related or whether it is more appropriately addressed by a relevant authority outside the Project.

The CLO will explain in writing (or orally where literacy is an issue) the manner in which the review was carried out, the results of the review, any changes to activities that will be undertaken to address the grievance and how the issue is being managed to meet appropriate environmental and social management systems and requirements. Grievance information will be recorded in a grievance log. This information will include:

- Stakeholder name and contact details
- Details of the nature of the grievance
- Date received, responded to and closed out

- How it was submitted, acknowledged, responded to and closed out. Individuals do not have to give their name, and also can request their name be kept confidential.

AGL cannot communicate responses to anonymous grievances. It is important to note that this mechanism does not take replace the legal rights that people have. Even if a person submits a grievance, he or she may use other legal avenues to achieve their goals.

AGL current CLO Indira Kekelidze will be the point of contact for grievances and comments for the 35kV line Project as well. Grievances and comments should be sent to the address below, where possible by using the Grievance and Information Request Form provided in Appendix B.

Name: Indira Kekelidze

Address: Khichauri Main Camp, Shuakhevi Municipality

E-mail: Indira.kekelidze@agl.com.ge

Mob: 593 68 25 25

Website: www.agl.com.ge

During the construction phase complaints will be received either by AGL, ACT and/or NMG. Though, AGL will set up a separate grievance log and whenever a complaint is received by ACT and/or NMG it will be re-directed and communicated to AGL so as to prevent parallel processes being followed. AGL will be a grievance owner, whose responsibility is to investigate the grievance, follow up and close out. All complaints received will be registered in a log and tracked down until close out. AGL will inform ACT/NMG about the decision made on a complaint and status. During the operation phase, only AGL will be in charge of receiving, acting and solving complaints.

7. Monitoring and reporting

This SEP identifies various activities that require monitoring and reporting including the following:

- The updating of the SEP for 35 kV line on an annual basis.
- CLO activities: minutes of consultation meetings will be produced and all original written consultation correspondence will be retained as evidence of the process and outcomes.
- Grievance logging and tracking: each grievance will be logged by the CLO, given an identification number and followed through by recording details and timing for their resolution and closing out.
- Reporting: Report summarizing project performance, CLO activities including grievances and annual updates to the SEP will be provided through semi-annual monitoring report.

Public domain documents will be distributed widely to stakeholders including regulatory agencies, project financiers, NGOs, local authorities, and local communities.

As part of the ESIA, an Environmental and Social Management and Monitoring Plan will detail specific monitoring and reporting requirements for environmental and social project performance.

8. Appendices

Appendix A. Information Brochure

Appendix B. Minutes of Information Meetings with Affected Communities

Appendix C. Public Grievance Form

Appendix A

“Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Project Information Brochure 2016

“Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Construction Project is implemented by LLC “New Metal Georgia” – as a builder -contractor of “Adjaristsqali Georgia”.

Within the frameworks of the “Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Construction Project, land acquisition and livelihood restoration plan development is provided by the consulting company “ACT”.

The following brochure aims to disseminate information regarding the “Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Construction Project. Brochure provides information concerning the project, impact assessment of the project affected area residents, as well as project affected land owners and users, along with land acquisition and resettlement policy.

Project Description

Project Sceme

The following project is located along the Adjaristskali river and its tributaries. 35 kV Skhalta-Shuakhevi Overhead Transmission Line will be constructed for 185 MW Shuakhevi Hydro Power Project located in Autonomous Republic of Adjara in Georgia. The power transmission line will be located near Chirukhistsqali and Skhalta rivers valley with 24 km length. 35 kV transmission Line will be located nearby seven settlements (Nigazeuli, Dabadzveli, Purtio, Nenia, Okropirauli, Chanchkhalo and Shuakehvi) in Shuakhevi district and three villages (Tsablanga, Kinchauli and Tcheri) in Khulo district.

The scope of work also includes preparing and implementation of Environmental Impact Analysis (EIA) and addendum to the Land Acquisition and Livelihood Restoration Plan (LALRP) developed in 2014.



Resettlement policy and principles

The project will be implemented in compliance with the Georgian Legislation on Involuntary Land Acquisition and Resettlement, along with the following international standards: IFC – 2012 Performance standard 5: Land Acquisition and Involuntary Resettlement, EBRD – 2014 Performance requirements 5: Land Acquisition, Involuntary Resettlement and Economic Displacement and ADB - 2009 Safeguard Requirement 2: Involuntary Resettlement. Project related land acquisition and resettlement principles were developed and approved as a result of the congruence of legal norms operating in Georgia and the IFC, EBRD ADB standards. Land Acquisition and Livelihood Restoration Plan represents an integral part of the project. The following principles are to be upheld helceforth early stages of the project:

- Land acquisition and resettlement will be minimised or avoided where possible.
- AGL will aim to achieve negotiated agreements on land acquisition with all affected persons based on the LALRP. AGL will negotiate fairly and openly with all APs to reach mutually acceptable agreements on compensation.
- All land acquisition and resettlement activities will be managed through resettlement action plans (where there is physical displacement) or LALRPs (when there is loss of economic displacement). Implementation results will be documented and monitored.
- All APs will be meaningfully consulted and be active participants in the negotiated settlements. Consultations will consider gender issues and take into account the needs of stakeholders who may be considered vulnerable. In the Project context, many if not all of the affected households are considered vulnerable.

Regarding compensation rights

Affected persons either receiving compensation or at least subjected to rehabilitation measures within the project, are defined as follows:

- All project affected persons deprived of land, regardless of possession of property rights on it or legal registry of land ownership;
- Proprietors of buildings, crops, trees and other units located on the affected land;
- All affected persons subjected to income losses such as loss of harvest or revenue, and/or business closure as a result of the project implementation.

Right to compensation will be limited to the "cut-off" date determined within the project, whence description of project affected persons together with the detailed measurement study will be conducted. Persons settled on the project area subsequent to the above mentioned date will not be eligible for a compensation, however, they will be notified to vacate residences and to demolish all affected buildings/structures prior to the project implementation. Dismantled building materials will not be confiscated; concurrently the aforementioned persons will not be subjected to any penalties or sanctions.

Compensation terms for the project affected persons subjected to land, residence, and income losses as well as rehabilitation subsidies, will include compensation for permanent or temporary land and building losses, harvest and tree losses, transportation subsidy, in addition to the aid for business closures based on tax returns and/or lost net amount. Besides, all affected households will be invited to financial management seminars organized by AGL to help them make good long term investments with their cash compensation. The above mentioned rights are as follows:

Land loss and land consumption restrictions

Type of Loss	Application	Project affected persons	Compensation
Permanent land loss	Permanent loss occurs for the lands located in the vicinity of overhead transmission line towers, underground stations, or permanent access roads	Proprietor fully registered land/proprietors of the land plot subject to legalization	Financial compensation of full land replacement costs. Proprietors of affected land plots subject to legalization will be provided full property rights as well as financial compensation of full land replacement costs.
Restrictions on land consumption	Affected families, who do not lose OHL Project corridor affected agricultural land, however are limited in the consumption of the said land (prohibition of tree growth beyond 4 meters; prohibition of building construction)	Proprietor fully registered land/proprietor of the land plot subject to legalization	Servitude agreement provides compensation for land consumption restrictions. The amount of compensation shall correspond to the market price difference between real servitude and lack thereof.

Building losses as a result of land loss and land consumption restrictions

Type of Loss	Application	Project affected persons	Compensation
Residential and non-residential buildings / assets	(Along the entire strip of the OHL Project, wherein construction of residential and non-residential buildings is forbidden)	All affected families regardless of legal ownership/registration status (including proprietors of the land plot subject to legalization and illegal residents)	All impacts will be considered full regardless of factual percentage figure to impact exposure. Financial compensation of full land replacement costs will be provided, notwithstanding depreciation and operation costs.

Loss of public infrastructure / resources

Type of Loss	Application	Project affected persons	Compensation
Loss of public infrastructure	Community / State assets	Community / Government	Restoration and recommencement of infrastructural constructions on the basis of public consultations

Loss of income or livelihood

Type of Loss	Application	Project affected persons	Compensation
Annual agricultural crops (permanent land loss due to the OHL Project towers or as a result of deployment of other permanent structures)	Impact on agricultural crops	All affected families regardless of legal ownership/registration status (including proprietors of the land plot subject to legalization and illegal residents)	Financial compensations will be provided according to the gross market value of current or future harvests. The above mentioned compensation will be provided regardless of harvest yield at the time of impact.
Along the entire strip of OHL Project, wherein tree planting is forbidden	Trees situated on affected areas	All affected families regardless of legal ownership/registration status (including proprietors of the land plot subject to legalization and illegal residents)	Compensations will be provided according to the gross market value of the tree type, age, and fructification.

Allowances

Type of Loss	Application	Project affected persons	Compensation
Severe impact	>50% loss of productive land	All affected families, including proprietors of the land plot subject to legalization and illegal residents)	Special assistance will be provided to affected families who loss more than 50% of their productive land holding. In kind assistance for livelihood restoration will be provided, namely productive land that is considered suitable and reasonably distanced. Rough unsurfaced land will be prepared with soil and grass seed to allow cattle to graze and crops to grow.
Vulnerability allowance		All affected families, including proprietors of the land plot subject to legalization and illegal residents) <i>(According to AGL's policy all affected households are treated in an equal manner)</i>	Total amount of compensation for project affected household lands (as a result of the permanent land loss) will increase by 10%.

Temporary losses

Type of Loss	Application	Project affected persons	Compensation Rights
Temporary impacts due to construction and maintenance works	Within and beyond the OHL Project strip	All project affected households	Compensation within the course of construction the will be calculated and issued on the basis of the following LALRP.
Unforeseen impacts (if occurred)			Contractor will reduce impacts/issue compensation in case of unforeseen impacts according to the above-mentioned compensation principles.

Complaints consideration and redress mechanism

Complaints mechanism will allow affected individuals to appeal against a decision or action, whereupon they do not agree in regards with the land or other unit compensation.

- On an initial stage, complaint redress will be attempted via unofficial intermediaries. Complaint shall be examined within 10 days of its submission.
- In the case complaint is unresolved on an initial stage, it shall be submitted to Adjaristskali Land and Social Team, who will review the appeal within 21 days.
- Where the complaint/grievance remains unresolved, it may be submitted to the complaint consideration and redress committee for further consideration. Complaint consideration and redress committee will review the complaint within 21 days of its submission.
- If the decision regarding complaint/grievance remains indeterminable subsequent to the complaint consideration and redress committee intervention or if the affected person remains unsatisfied with the outcome of the complaint consideration and redress mechanism, such complaint/grievance may be filed with the relevant jurisdiction court (district court).

Project-related comments and inquiries should be addressed to the following addresses:

LLC "AGL"

Address: I. Abashidze Street 6, Batumi, Georgia, 6010

Tel: 0422 27 12 17

Website: www.agl.com.ge

E-mail: info@agl.com.ge

Ltd "New Metal Georgia" (NMG)

Address: Ateti Street 18 G, Tbilisi, Georgia.

Tel: 032 2 220355

Website: www.nmg.ge

E-mail: dmb-7@mail.ru

Ltd ACT

Address: 51 Sairme Hill, 0194, Tbilisi, Georgia, 0194

Tel: +995 32 2422 322

Website: www.act-global.com

E-mail: geo@act-global.com

All project related information will be updated on a regular basis and will be available on the website:

www.agl.com.ge



Appendix B

“Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Project

Community Meetings

Meeting 1

Meeting Location: Shuakhevi Gamgeoba building – Shuakhevi municipality

57 local residents from Shuakhevi, Nigazeuli, Dabadzveli, Purtio, Nenia, Chanchkhalo, Okropilauri villages attended the meeting. Please see Table A below for the list of attendees.

Date: 17.05.2016

ACT representative Shorena Tchokhnelidze introduced herself to the project affected people from Shuakhevi settlements. She also introduced representative of New Metal Georgia Zaza Kachkachishvili and independent experts from “Expert Audit” Emzar Katamadze and Davit Sharashidze. She briefly presented the main purpose of the meeting and its agenda to the audience and distributed Information Brochures of “Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Project. After that Shorena Tchokhnelidze presented the project itself. Then project affected people were asked to express their opinions and raise questions regarding the introduced project.

- Project Affected Person - *We met company representatives. Their conditions were 90 per cent satisfactory for us. The draft was the following that they would study the situation and evaluate it. The territory where towers are installed would be purchased and agreements would be made. All above-mentioned was acceptable. Is there anything else?*

ACT Representative Shorena Tchokhnelidze – Yes, it would be like that. Besides, at this stage inventory process is under way. Information meetings are conducted with project affected population. In the nearest future our representatives will come to your families for interviews as socio-economic survey is planned to be implemented. Only after that negotiation process regarding compensations and agreements will start on individual level.



- Project Affected Person – *I do not understand, what survey? Why does our private social condition matter when transmission line runs over my private land? How is this study connected with all this? What kind of compensations are we talking now? For example, if I am a millionaire, how would my economic situation influence the compensations? Why are you interested in it?*

ACT Representative Shorena Tchokhnelidze - According to international standards in case of such infrastructural projects implementation of social surveys is required. In the frames of such surveys project affected person is interviewed face to face however the data of each interviewee is generalized and the final report is written about the whole PAP community. All the planned activities including socio-economic survey aim to reveal all possible negative effects of the project in order to eliminate them or minimize.

- Project Affected Person – *We either simplify or deteriorate the situation. People who do not have land in the project zone will not be satisfied of course because the whole land plot of their neighbors are in the project zone while only one per cent of their land is affected. And one is given much more money than other. Of course such people will not be satisfied. What if with the help of such surveys people who did not have right at all would claim for the money while the right owners will not receive anything.*

ACT Representative Shorena Tchokhnelidze - We will survey only project affected people and will not meet or interview those who are not affected by the project. Besides, compensation amount will be defined on the basis of inventory process and evaluation of independent expert. Similar approach and standard will be applied in case of all project affected people.

- Project Affected Person – *Somebody mentioned that audit company has already finished their works.*

New Metal Georgia Representative Zaza Kachkachishvili – No, it is not right. We are just beginning works. We have just visited all plots recorded details, took pictures and we are going to continue with inventory process.

- Project Affected Person – *People came last year too because of transmission line of 220 kV.*

New Metal Georgia Representative Zaza Kachkachishvili – No, it was not us. We came 20 days ago. We are now talking about 35 kV Overhead Transmission Line.

- Project Affected Person – *We were told that it would be 35 kV but as a result we would get 220 kV, would not we?*

ACT Representative Shorena Tchokhnelidze – Of course not. We are now talking about 35 kV Overhead Transmission Line Project. That is a different project.

- Project Affected Person - *When will construction begin?*



New Metal Georgia Representative Zaza Kachkachishvili - We could not begin constructions at the moment because works are done now at Hydropower Plant. We will begin construction from there. First of all trees will be cut, roads will be made to the construction line and only after that we will start building.

ACT Representative Shorena Tchokhnelidze – As I have already mentioned at this stage we are trying to inform project affected population about the details of the planned project. Inventory process, social surveys, auditory assessments are also under way. Only after developing final plan and when the negotiation process with land users and owners are finished and compensations are agreed, construction of 35 kV Overhead Transmission Line will begin.

- Project Affected Person - *For example, if one tower is installed in one land plot and another tower in another land plot and transmission line will run over. What will happen with the land plots under this transmission line?*

ACT Representative Shorena Tchokhnelidze - Servitude contracts will be signed with the users/owners of such land plots under the transmission line. It means that such users/owners will have some restrictions on land usage. For example, they will not be allowed to plant high trees which are four meters in height or higher. They will not be allowed to build buildings there as well. However, they can do anything else under this line and continue other agricultural or any other activities. Compensations will be made on the basis of what was cultivated in such land plots during inventory process.

- Project Affected Person - *If it happens that land plot is under transmission line, however workers will have no need to enter those plots. What will happen in such case, will not they be compensated?*

ACT Representative Shorena Tchokhnelidze – Of course they will be compensated because land usage restrictions in the Right of Way zone. Restrictions like planting high trees or constructing buildings. They will be compensated and can continue land usage but with above-mentioned restrictions.

- Project Affected Person - *Your representative visited us and talked with us. Will this new tower be next to the old tower and will the line run next to the old one?*

New Metal Georgia Representative Zaza Kachkachishvili - It almost runs next to the old line. We could not be more specific at this stage.

- Project Affected Person - *Old tower that is already there, will it be moved to somewhere else? The old is already there and will there be the new one instead on its place?*

New Metal Georgia Representative Zaza Kachkachishvili - We will have only new towers and line will not run on old towers.

- Project Affected Person - *If I have a nut-tree planted in my land plot or if I want to plant it. What happens in this case?*



Expert Audit Representative Emzar Katamadze - Territories of posts will be purchased from land owners by the company. The price will be defined according to existed market prices. As for land plots under transmission line, there will be “cut off” zone 20 meters on the right and on the left of the line and buffer zone 40 meters on the right and on the left of the line. Servitude agreements will be made with land users and owners in cut off and buffer zones. Servitude agreements mean that they will have some restriction on land usage like planting four meter and higher trees and building constructions. Otherwise they will use those land plots as they wish. They will be paid one-time compensation because of already mentioned restrictions. We will come to every project affected person and evaluate everything.

- Project Affected Person - *There are people who have their land plots officially registered. However, there are category of families who do not have officially registered land plots. The government has taken their land plots from them. What happens in such cases?*

New Metal Georgia Representative Zaza Kachkachishvili - Land users will be compensated even if they do not have registration document on the land. However, each case will be studied separately in order to identify the right user of the land.

- Project Affected Person - *I have a vineyard. You say that 35 kV Overhead Transmission Line and then 220 kV line will run over it. And now you say that I will have restrictions on usage of my land. If I want to plant something on that land in the future, what will happen then?*

New Metal Georgia Representative Zaza Kachkachishvili - Servitude agreement, its content and idea includes such restrictions. This restriction is made because of high voltage and that is why high trees or building are restricted under the transmission line. That is why compensation amount for such restrictions is calculated and then paid to you. We do not have any private interests for not paying you appropriate compensations however we have some timeframes and agreements should be made during that period.

- Project Affected Person - *(Khimshiashvili and Kekelidze case) Our lands were illegally appropriated by three people. We were not in the village at that time. We do not have legal document on the land plot which can be purchased or compensated with servitude agreement. No agreement has been made on land ownership so far.*

ACT Representative Shorena Tchokhonelidze - In case of disputed cases regarding land ownership, it would be better to settle such issues inside your communities with the help of neighbors and official representatives of the village. Your local community should make a decision. Company could not settle such disputes. You should try to settle this argument locally and negotiate with each other.

- Project Affected Person - *I have a nut-tree which is 25-meter-high and 25 years old. They did not record this tree and told me that it would be cut when construction work begins. I asked them to record the tree but I do not know if they did it*



New Metal Georgia Representative Zaza Kachkachishvili - Inventory process has not finished yet and we will contact you and study the case.

- Project Affected Person - *Where is the rout of the line and how will it run? If agreements are not made between the owner and the company, what will happen then? Are there any alternative ways because the government has no right to enter private property? What mechanisms do you use during negotiation? What will be the amount of compensation? Will population have free electricity or some privileges on electricity tariffs? If we take compensations of 5000 or 10000, will not such projects have more severe impact in our region?*

ACT Representative Shorena Tchokhnelidze - At this stage there is a draft plan of the line rout. Evaluation process is being made. Also audit company defines prices. Only after that negotiation process with project affected people begins and in case of achieved agreement, compensations will be made. Agreements will be made individually with each project affected person. If agreement is not reached than alternative ways will be used by the company. As for free electricity, this issue could not be settled within the frames of this project. As for negative impact on environment, environmental assessments are made preliminary in order to identify all negative effects and eliminate or minimize them. Only after that final plans are confirmed.

Table A: List of attendees

	Name and Surname	Settlement	Municipality
1	Mikheil Kametadze	Nenia	Shuakhevi
2	Otar Zoidze	Dabadzveli	Shuakhevi
3	Mukhamed Davitadze	Okropilauri	Shuakhevi
4	Merab Davitadze	Shuakhevi	Shuakhevi
5	Gia Davitadze	Shuakhevi	Shuakhevi
6	Levan Khiladze	Purtio	Shuakhevi
7	Pridon Davitadze	Shuakhevi	Shuakhevi
8	Nodar Mikeladze	Purtio	Shuakhevi
9	Mukhasheka Shakharadze	Purtio	Shuakhevi
10	Shakro Diasamidze	Chanchkhalo	Shuakhevi
11	Levan Zoidze	Dabadzveli	Shuakhevi
12	Tamaz Meradze	Purtio	Shuakhevi
13	Gocha Zurabashvili	Purtio	Shuakhevi
14	Tamara Zurabashvili	Dabadzveli	Shuakhevi



	Name and Surname	Settlement	Municipality
15	Ioseb Zoidze	Dabadzveli	Shuakhevi
16	Jumber Zoidze	Dabadzveli	Shuakhevi
17	Davit Zoidze	Dabazdveli	Shuakhevi
18	Zhuzhuna Saparidze	Dabadzveli	Shuakhevi
19	Mukhran Zoidze	Dabadzveli	Shuakhevi
20	Tengo Zoidze	Dabadzveli	Shuakhevi
21	Nodar Zoidze	Dabadzveli	Shuakhevi
22	Teimuraz Zoidze	Dabadzveli	Shuakhevi
23	Garsevan Zoidze	Dabadzveli	Shuakhevi
24	Tariel Zoidze	Dabadzveli	Shuakhevi
25	Levan Zoidze	Dabadzveli	Shuakhevi
26	Alexandr Kekelidze	Nigazeuli	Shuakhevi
27	Guram Kekelidze	Nigazeuli	Shuakhevi
28	Mukhamed Kekelidze	Nigazeuli	Shuakhevi
29	Vazha Khimshiashvili	Nigazeuli	Shuakhevi
30	Shukri Kekelidze	Nigazeuli	Shuakhevi
31	Roman Kekelidze	Nigazeuli	Shuakhevi
32	Bezhan Khimshiashvili	Nigazeuli	Shuakhevi
33	Medea Kartsivadze	Nigazeuli	Shuakhevi
34	Ineza Kekelidze	Nigazeuli	Shuakhevi
35	Meri Kekelidze	Nigazeuli	Shuakhevi
36	Zhiguli Turmanidze	ღაბღ Shuakhevi	Shuakhevi
37	Guguli Zoidze	Dabadzveli	Shuakhevi
38	Nazibrola Tarieladze	Dabadzveli	Shuakhevi
39	Vakhtang Khimshiashvili	Nigazeuli	Shuakhevi
40	Avtandil Khimshiashvili	Nigazeuli	Shuakhevi
41	Levan Resulidze	Nigazeuli	Shuakhevi
42	Murad Resulidze	Nigazeuli	Shuakhevi
43	Albert Diasamidze	Purtio	Shuakhevi



	Name and Surname	Settlement	Municipality
44	Nodar Surmanidze	Purtio	Shuakhevi
45	Edvard Diasamidze	Purtio	Shuakhevi
46	Anzor Dumbadze	Purtio	Shuakhevi
47	Merab Kamdadze	Nenia	Shuakhevi
48	Shota Kamdadze	Nenia	Shuakhevi
49	Levan Shavadze	Gurdzauli	Shuakhevi
50	Irakli Davitadze	Shuakhevi	Shuakhevi
51	Revaz Zoidze	Dabadzveli	Shuakhevi
52	Liana Kartsivadze	Dabadzveli	Shuakhevi
53	Guram Davitadze	Okropilauri	Shuakhevi
54	Roin Dumbadze	Chanchkhalo	Shuakhevi
55	Gulnara Dumbadze	Chanchkhalo	Shuakhevi
56	Revaz Dumbadze	Chanchkhalo	Shuakhevi
57	Davit Dumbadze	Chanchkhalo	Shuakhevi



Meeting 2

Meeting location: Skhalta Community – Skhalta Museum building

23 local residents from Kinchauri, Tcheri, Dzmagula villages attended the meeting. Table B shows the list of attendees

Date: 28.05.2016

ACT representative Shorena Tchokhnelidze introduced herself to the project affected people from Khulo settlements. She also introduced representatives of “New Metal Georgia” Zaza Kachkachishvili and Davit Mzhavanadze and representative of “Adjaristskali Georgia” Avto Ivanadze. She briefly presented the main purpose of the meeting and its agenda to the audience and distributed Information Brochures of “Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Project. After that Shorena Tchokhnelidze presented the project itself. Then project affected people were asked to express their opinions and raise questions regarding the introduced project.

- Project Affected Person - *What about land parcels which are not registered? Will they be registered?*

Adjaristskali Georgia Representative Avto Ivanadze - 90 per cent of land plots are not registered in upper Adjara in total. We will help you to save and register your land if it is possible. The document certifying legacy of ownership on land in Khulo and upper Adjara in the period of communists was given to population according to civil code. It is juridical document and when this legacy is certified by the government now, it will become official registration. Then in 1998 land reform was implemented in upper Adjara. In the frames of this reform land parcels are given to each household by protocols. Those protocols are now kept in the archive and families are aware of them. You should withdraw those protocols from the archive in order to register your land. We would like you to register your land. All other land within the project will be registered as government land. Accordingly, in such cases servitude agreement will be made with the government and the company. As for compensations, they will be given on registered as well as not registered land, unless they are disputed land parcels.

- Project Affected Person - *I know whose property the land is. Is such land governmental property? If I do not have any documents on land, what would happen in that case? Who is to blame for this?*

Adjaristskali Georgia Representative Avto Ivanadze – I could answer with Shuakhevi example. The land used to be governmental property before the civil law enactment. After it the term given on possession appeared and the owner could have any right to on it (sell, buy, give on rent etc.). Land plots of 2500



which were given to the households during communist period, those land plots were given as a property to the families. After that inventory process was made in the villages and marginal norm was defined.

- Project Affected Person – *What will happen if the government needs this land?*

New Metal Georgia Representative Zaza Kachkachishvili - If it is the project is of governmental importance and if the government needs the land, it could take the land even if it is somebody's property. Of course in the frames of existed legislation.

- Project Affected Person - *If there is a spruce in my land, where will it go, when it is cut?*

New Metal Georgia Representative Davit Mzhavanadze - For example, if those are fruit trees, of course they will be compensated according to tariff preliminary defined by the audit company. But if it is spruce and part of the forest is on your land, then such trees are property of the government and the municipality. All such trees are registered and they are given to the municipality after they are cut. All trees have their legal owners and we will give them to appropriate agencies.

- Project Affected Person - *For example, If the territory you need is water protection zone. What would you do to avoid landslides? What kind of activities will be implemented?*

ACT Representative Shorena Tchokhnelidze - Safety measures should be kept by all means. All possible danger will be identified before construction process in order to plan appropriate preventive actions.

- Project Affected Person - *If the village does not want to allow building towers in our territory, what will happen in this case?*

New Metal Georgia Representative Davit Mzhavanadze - If agreement is not reached in your village, we will find alternative ways. We will go over mountains in that case. However, planned rout is safer and more acceptable for us. Accordingly, it would be good if agreement is reached.

- Project Affected Person - *How much would alternative way cost for you? You know better that it would cost much more than agreement with local population. Would not adding money to land owner be better?*

ACT Representative Shorena Tchokhnelidze – Negotiations have not begun yet and you do not have reason for such statements. How you could know preliminary if you agree or not or what will be suggested. All land owners and users will be treated equally.

- Project Affected Person - *I'd like to know if negotiation is possible. For example, if audit rated my land six Lari and if alternative ways for the project were expensive, could not we ask audit to rate our lands higher?*

New Metal Georgia Representative Davit Mzhavanadze - We could meet about 400 families like you and if each of them asks the same, in that case alternative ways seem much cheaper and more appropriate.



ACT Representative Shorena Tchokhnelidze - As I have already mentioned all affected land owners and land users will be treated equally within the project. Tariffs will be defined by an independent audit company.

- Project Affected Person - *When there is such meeting in the village, representatives from municipal government should be here. When they are not here it means they are neglecting us.*

New Metal Georgia Representative Zaza Kachkachishvili - There is one representative of local government here.

- Project Affected Person - *Inadequate amount was suggested. Population is paid almost nothing. 1.50 GEL was given to population.*

ACT Representative Shorena Tchokhnelidze - What amount are you talking about?

- Project Affected Person - *This mountain is over our heads. When you cut it, where will it go?*
- Project Affected Person - *Why does the government take those lands from people? It is our land. Yes, we could not register it but what did the government do for us? We are peasants and what does the government do for us?*

ACT Representative Shorena Tchokhnelidze - We all live in 21st century when everything is recorded and registered. You should do your best to register your land. As I see land registration is global problem in your region. In the frames of this project you will be paid anyway notwithstanding registration because company takes into consideration existed situation. However, I will repeat that you'd better try and the company will help you in this process as it would be possible in the frames of this project. For example, with consultation, maps etc.

- Project Affected Person - *Who pays to us in this project? The company or the government?*

Adjaristskali Georgia Representative Avto Ivanadze - Agreements will be made with "Adjaristskali Georgia" and accordingly it will pay you compensations. It has agreement with "New Metal Georgia" and in the frames of this contract "New Metal Georgia" leads negotiation process with you but "Adjaristskali Georgia" will pay.

- Project Affected Person - *I have one question. What is the length of transmission line? Where does it start and where ends? What are the negative effects of this line? Please tell me about negative and positive sides.*

Adjaristskali Georgia Representative Avto Ivanadze - It is 35 kV and around 24 kilometers in length. Its positive side is transmission of electricity and negative side is that there will be restrictions on constructing buildings and planting high trees in its corridor.



- Project Affected Person - *As I know it has magnetic radiation. For example, in case of 220 kV line, there is emission around it.*

New Metal Georgia Representative Davit Mzhavanadze - Even cell phones emit radiofrequency energy. That is why such transmission lines have their required size and safety norms like not approaching them in 6-9 meters. You will not be endangered at all except restrictions on high trees. You can plant anything else even under the posts. Its emission will not reach your harvest unless it is high tree.

- Project Affected Person - *What will be the height of towers?*

New Metal Georgia Representative Davit Mzhavanadze - We will mainly use posts required for 110 kV transmission lines and 35 kV line will run there. The type of towers will be chosen according to terrain of each location.

- Project Affected Person - *I have grapes, walnuts and nuts planted there. Will not the line ruin my harvest?*

ACT Representative Shorena Tchokhnelidze - As we have already mentioned, it will have no impact on harvest. There is restriction only on high trees.

- Project Affected Person - *There are disputed land plots and will the company help with them?*

ACT Representative Shorena Tchokhnelidze - You should solve those issues inside your community. It is desirable to be settled as soon as possible because company can begin negotiations only if such disputes are solved. If there are some other problems, as I have already mentioned you could address grievance procedure. You were given special forms for this.

- Project Affected Person - *What if the line falls and my harvest is ruined or people are damaged? What will happen in this case?*

ACT Representative Shorena Tchokhnelidze - In case of all such unforeseen losses, the company is obliged to compensate the impacts.

- Project Affected Person - *Energy company obliges us to pay bills no later than 19-20 and if we do not pay on time we will be fined. However, neither energy company nor the government take responsibility for giving us 120 V or 300 V instead of 220 V and burn our gadgets or leave us without electricity. Energy Company does not take such responsibilities and what about you?*

ACT Representative Shorena Tchokhnelidze - When you are talking about electricity bills or quality of electricity you should address appropriate company. This issue is beyond this discussion about the project.

- Project Affected Person - *I have to pay for electricity on 19-20 and I can't do it. Quality of electricity is responsibility of electricity utility company.*



- Project Affected Person - *We are 50 households in the village and we live in terrible conditions. We are in danger of landslides from above, floods underneath and now these transmission lines. What will happen to us? Government does not want to take any responsibility for anything.*

ACT Representative Shorena Tchokhnelidze - Before starting such projects all possible negative effects of the project are studied and risks are taken into consideration. Only after that the plan of the project is presented to the government and only after its approval works can start. This project is implemented in accordance of high international standards.

- Project Affected Person - *I think instead of giving us compensations on the basis of a single paper, the company should help us with registration process. Why do not you do this?*

ACT Representative Shorena Tchokhnelidze - As I have already mentioned the company will help in some extend with land registration process, however nobody else could register land for you. First of all, you should withdraw appropriate documents in the archive.

- Project Affected Person - *As I understand audit company decides amount of our compensations, does not it? Will we be involved in this process or they will evaluate and decide? Has it been already decided?*

ACT Representative Shorena Tchokhnelidze - As I have already mentioned according to the company policy all project affected land users and land owners will be treated equally. Tariffs are defined by an independent audit company.

- Project Affected Person – *It is 220 kV transmission line, is not it?*

ACT Representative Shorena Tchokhnelidze – No, Madam. As I have already mentioned and as it presented in the information brochures, it is 35 kV transmission line.

- Project Affected Person – *Who could we give this completed grievance form to?*

ACT Representative Shorena Tchokhnelidze - Before completing those forms, try to negotiate with the company and only if agreement is not reached, complete the form and send to “Adjaristskali Georgia” and you will be given answers in 21 days.

Table B List of attendees

	Name and Surname	Settlement	Municipality
1	Goderdzi Abashidze	Kinchauri	Khulo
2	Akaki Shanidze	Kinchauri	Khulo



3	Dato Abashidze	Kinchaure	Khulo
4	Levan Shonia	Kinchaure	Khulo
5	Serozha Surmanidze	Kinchaure	Khulo
6	Roman Abashidze	Kinchaure	Khulo
7	Revaz Iremadze	Kinchaure	Khulo
8	Giorgi Shanidze	Kinchaure	Khulo
9	Tornike Shanidze	Kinchaure	Khulo
10	Omar Surmanidze	Kinchaure	Khulo
11	Guram Shanidze	Kinchaure	Khulo
12	Amiran Basiladze	Tcheri	Khulo
13	Nugzar Gorgiladze	Tcheri	Khulo
14	Mikehil Davitadze	Tcheri	Khulo
15	Bukhuti Surmanidz	Tcheri	Khulo
16	Givi Bolkvadze	Dzmagula	Khulo
17	Zviad Surmanidze	Tcheri	Khulo
18	Irakli Surmanidze	Kinchaure	Khulo
19	Lado Surmanidze	Kinchaure	Khulo
20	Dariko Tsetskhladze	Kinchaure	Khulo
21	Merab Shanidze	Kinchaure	Khulo
22	Zauri Gorgiladze	Tcheri	Khulo
23	Resan Srmanidze	Tcheri	Khulo



Meeting 3

Meeting location: Village Tsablana – Khulo municipality

19 people from Tsablana village attended the meeting. See Table C for the list of attendees.

Date: 28.05.2016

ACT representative Shorena Tchokhnelidze introduced herself to the project affected people in Tsablana. She also introduced representatives of “New Metal Georgia” Zaza Kachkachishvili and Davit Mzhavanadze and representative of “Adjaristkali Georgia” Avto Ivanadze. She briefly presented the main purpose of the meeting and its agenda to the audience and distributed Information Brochures of “Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Project. After that Shorena Tchokhnelidze presented the project itself. Then project affected people were asked to express their opinions and raise questions regarding the introduced project.

- Project Affected Person - *We are interested in land registration issues and also about safety measures of this transmission line.*

ACT Representative Shorena Tchokhnelidze - In the frames of presented project specificity of the region is taken into consideration and all project affected real land users will be given compensation even if they do not have registration documents on land. However, I will repeat that it will happen in the frames of this project accordingly you would better register land plots that you claim to be yours. The company will do its best to help you in this process.

New Metal Georgia Representative Davit Mzhavanadze - Compensations will be paid even if there is no registration document on land. As for negative impact of the project, I would like to explain that there are required standards and sizes for each type of transmission line and such standards are taken into consideration and will be kept during construction process. Accordingly, no harm will be made on your harvest. The only restriction will be on four meter and higher trees. You can work as usual in buffer (RoW) zone and take compensation for restriction on trees and buildings there.

- Project Affected Person - *If there is no harm on harvest nor people, then we could discuss this issue. However, in recent years the whole harvest of potatoes has been damaged in Khulo probably because of radiation.*



New Metal Georgia Representative Davit Mzhavanadze - It could not have happened because of overhead transmission lines because electricity is pure and has no radiation. Your mobile phones have more radiation than transmission lines. It has only magnetic field which does not exceed 2 meters of radius. As I have already told you appropriate size standards will be kept.

ACT Representative Shorena Tchokhnelidze - Only high trees and buildings are dangerous in the Right of Way (RoW) of transmission line. That is why there are restrictions in this zone and you are compensated because of these restrictions. And of course if productive tree is cut in your land, you will be given compensation too.

- Project Affected Person - *Does this line come from Akhaltsikhe? If a tree, for example oak was cut on my land, will the government be compensated for this? If a tree was cut and no compensation was given, what then?*

ACT Representative Shorena Tchokhnelidze – No, not from Akhaltsikhe. I would like to differentiate fruit trees from for example Spruce which is governmental property. Of course if such spruce is cut, its timber is given to the municipality and municipality government will decide how to use it.

- Project Affected Person - *If we could not agree after the negotiations, it means you will implement the project anyway.*

ACT Representative Shorena Tchokhnelidze - If you are affected land user nobody will begin any works on your land without agreeing with you.

New Metal Georgia Representative Davit Mzhavanadze - We apply European standards and there is no reason for not achieving agreement. You have cultivated, cultivate and will cultivate harvest in your lands. You will just be given additional compensations. Notwithstanding the fact that mainly this land is governmental property, the company, World Bank, Adjaristskali have taken into consideration existed situation and you will be given compensation notwithstanding registration issues. You will not lose anything anyway. The line will be of 35 kV and will have no harm on your harvest nor your health.

- Project Affected Person - *Who will we be depended on electricity?*

New Metal Georgia Representative Davit Mzhavanadze - Electricity supplier is “Energopro Georgia” and you should address them regarding this issue.

- Project Affected Person - *What about employment?*

New Metal Georgia Representative Davit Mzhavanadze - We are willing to employ local population, however our specializations are very specific and requires adequate experience. However, we will have positions like a guard and besides we will need to rent accommodation, purchase food and it would be good for the village of course.



- Project Affected Person - *Two companies are working in our village at the moments. And we are pleased. They helped us when there was a fire and in case of rain on the roads as well.*
- Project Affected Person - *Could you give your cars for a day and if we pay for fuel could you help us to carry stones or there are some restrictions on it.*

New Metal Georgia Representative Davit Mzhavanadze - We could not let our machinery for a whole day however we could help for an hour or two if you need digging ground or carry something or straighten road. Unfortunately, we could not help for a whole day.

Table C: list of attendees

	Name and Surname	Settlement	Municipality
1	Nodar Shanidze	Tsablana	Khulo
2	Revaz Makharadze	Tsablana	Khulo
3	Zebur Shanidze	Tsablana	Khulo
4	Natela Shanidze	Tsablana	Khulo
5	Temur Shanidze	Tsablana	Khulo
6	Raul Makharadze	Tsablana	Khulo
7	Beglar Shanidze	Tsablana	Khulo
8	Rolando Davitadze	Tsablana	Khulo
9	Ramaz Shanidze	Tsablana	Khulo
10	Ramaz Shanidze/Topan	Tsablana	Khulo
11	Nodar Davitadze	Tsablana	Khulo
12	Omar Davitadze	Tsablana	Khulo
13	Lado Davitadze	Tsablana	Khulo
14	Nodar Shanidze/Osman	Tsablana	Khulo
15	Badri Shanidze	Tsablana	Khulo
16	Murman Shanidze	Tsablana	Khulo
17	Nazi Shanidze	Tsablana	Khulo
18	Tengiz Shanidze	Tsablana	Khulo
19	Otar Shanidze	Tsablana	Khulo



Meeting 4

Meeting location: Shuakhevi Gamgeoba building – Shuakhevi municipality

12 residents from the village Beselashvilebi attended the meeting. See Table D for the list of attendees

Date: 08.06.2016

ACT representative Shorena Tchokhnelidze introduced herself to the project affected people from the village Beselashvilebi. She also introduced a representative of “New Metal Georgia” Zaza Kachkachishvili and a representative of “Adjaristskali Georgia” Avto Ivanadze. She briefly presented the main purpose of the meeting and its agenda to the audience and distributed Information Brochures of “Skhalta-Shuakhevi” 35 kV Overhead Transmission Line Project. After that Shorena Tchokhnelidze presented the project itself. Then project affected people were asked to express their opinions and raise questions regarding the introduced project.

- Project Affected Person - *Will it be in 50-60 meters radius? What will be the height?*

ACT Representative Shorena Tchokhnelidze – There are special international standards for the size of towers and the height will be calculated accordingly for each location taking into consideration specifications of the place. Mainly 110 kV transmission line towers will be used for 35 kV OTL project.

- Project Affected Person - *Will not it be dangerous?*

New Metal Georgia Representative Zaza Kachkachishvili - We provide sizes and drawings in line with international standards and then AGL/GSE/Energopro will discuss the details and decide the height and construction standards.

ACT Representative Shorena Tchokhnelidze - Anyway safety measures will be thoroughly kept.

- Project Affected Person – Will not it be overload? Is it like 220 kV line?

New Metal Georgia Representative Zaza Kachkachishvili - There is already 35 kV transmission line in your territory.

- Project Affected Person - *What about unregistered lands? Most of local population have not registered land plots and what will happen to them?*

ACT Representative Shorena Tchokhnelidze - Considering specificities and existed situation regarding land registration in the region, in the frames of presented project land users without land registration will be compensated too. However, I would like to repeat that it applies to the presented project. Accordingly,



our recommendation for you will be the following: register your land plots and the company will help you whatever it can do.

Adjaristskali Georgia Representative Avto Ivanadze - We will give you consultation on land issues and in the frames of legislation help you in registration process if it is not disputed land plot.

- Project Affected Person - *We were refused to register land nearby river banks, what can we do?*

Adjaristskali Georgia Representative Avto Ivanadze - In case of governmental property like forest funds or river banks, compensation will not be given. Compensation will be given only on land plots that you use: pastures, arable land, land covered with greens even if they are not registered.

- Project Affected Person - *What about forests?*

Adjaristskali Georgia Representative Avto Ivanadze - As I have already mentioned there will be no compensation on forest funds.

- Project Affected Person - *Could not we use our land anymore? If I have 200 meters registered and 300 meters not registered, will it stay aside?*

ACT Representative Shorena Tchokhnelidze - Audit company will study productiveness of trees, harvest amount and compensations will be calculated accordingly. Besides, as Adjaristkali Georgia's policy intends to treat all affected people in equal manner, accordingly all project affected population are given additional compensation of vulnerable households which means that total amount of compensation for project affected household lands (as a result of the permanent land loss or servitude) will increase by 10 per cent. Furthermore, special assistance will be provided to affected families who loss more than 50 per cent of their productive land holding. In kind assistance for livelihood restoration will be provided, namely productive land that is considered suitable and reasonably distanced. Rough unsurfaced land will be prepared with soil and grass seed to allow cattle to graze and crops to grow.

- Project Affected Person - *In the times of communists 3000 square meters of land was registered, maximum 5000, only arable lands where corn or any other culture was cultivated. 1500 square meters was registered while a family owned 2 hectares of land. Accordingly, most of my land is not registered and will I receive more on registered land? As in case of shared land plots, it will be between us to negotiate.*

ACT Representative Shorena Tchokhnelidze - Compensation on registered and not registered land will be equal. However, I would like to repeat that it happens in the frames of this particular project and our recommendation for you is to register land plots which are used by your families.



Adjaristskali Georgia Representative Avto Ivanadze - The basis for registration are household records which are kept in the archives. Land plots of 2500-5000 square meters which were given to peasants in the Soviet times. Those land plots on the basis of land legislation are automatically given into the property. However, additional cadastral maps and registration is needed to be done. As for other land plots, according to land reform of 1998 land parcels in all villages were distributed among local households. Those protocols are kept in the archive, the recordings about who is the owner and how much land is owned by whom. Documentation should be taken from the archive and register land plots.

- Project Affected Person - *What if the owner is dead? What would happen in this case?*

Adjaristskali Georgia Representative Avto Ivanadze - Land parcels are registered on households and not a person. Accordingly, unless nobody left alive from the family, there will be no problem.

- Project Affected Person - *Does it apply to land parcels nearby river banks?*

Adjaristskali Georgia Representative Avto Ivanadze - This legislation is valid for homestead land plots. Water law came on force afterwards.

- Project Affected Person - *Social vulnerability status was abolished by the minister and what will be with that?*

ACT Representative Shorena Tchokhnelidze - It will have no influence on compensation amount. Additional 10 per cent is considered for all project affected people.

- Project Affected Person - *How much will square meter of land be?*

ACT Representative Shorena Tchokhnelidze - Audit company will define tariffs.

Table D: list of attendees

	Name and Surname	Settlement	Municipality
1	Nodar Diasamidze	Beselashvilebi	Shuakhevi
2	Murman Diasamidze	Beselashvilebi	Shuakhevi
3	Levan Diasamidze	Beselashvilebi	Shuakhevi
4	John Diasamidze	Beselashvilebi	Shuakhevi
5	Egnate Diasamidze	Beselashvilebi	Shuakhevi
6	Zviad Diasamidze	Beselashvilebi	Shuakhevi



	Name and Surname	Settlement	Municipality
7	Ramaz Diasamidze	Beselashvilebi	Shuakhevi
8	Nuri Diasamidze	Beselashvilebi	Shuakhevi
9	Nodar Diasamidze /Shukri	Beselashvilebi	Shuakhevi
10	Kazima Diasamidze	Beselashvilebi	Shuakhevi
11	Svetlana Davitadze	Beselashvilebi	Shuakhevi
12	Nodar Zoidze	Beselashvilebi	Shuakhevi



Appendix C

Complaint and Remarks Application Form

Name, Last Name:	
Contact information: <i>Please indicate your preferred form of communication (mail, telephone, e-mail)</i>	<input type="checkbox"/> <i>Mail: Please indicate a mailing address:</i> _____ _____ _____ <input type="checkbox"/> <i>Phone Number:</i> _____ <input type="checkbox"/> <i>E-mail:</i> _____
<i>Please indicate your preferred language of communication</i>	<input type="checkbox"/> Georgian <input type="checkbox"/> English <input type="checkbox"/> Russian
Please describe the incident or complaint: <i>What happened? Where did it happen? Involved individuals? What has the problem resulted in?</i>	
Incident complaint date:	<input type="checkbox"/> Single incident/complaint (Date _____) <input type="checkbox"/> Reoccurring incident (Multiple instances: _____) <input type="checkbox"/> Ongoing (existant problem)
How, in your opinion, can the problem be resovled?	
Signature: _____	Date: _____

Project-related comments and inquiries should be addressed to the following addresses:

Adjaristsqali Georgia LLC

Address: I. Abashidze Street 6, Batumi, Georgia, 6010

Tel: 0422 27 12 17

Website: www.agl.com.ge

E-mail: info@agl.com.ge

Ltd "New Metal Georgia" (NMG)

Address: Ateti Street 18 G, Tbilisi, Georgia.

Tel: 032 2 220355

Website: www.nmg.ge

E-mail: dmb-7@mail.ru

Ltd ACT

Address: 51 Sairme Hill, 0194, Tbilisi, Georgia, 0194

Tel: +995 32 2422 322

Website: www.act-global.com

E-mail: geo@act-global.com

All project related information will be updated on a regular basis and will be available on the website:

www.agl.com.ge