

# **Uzbekistan: Cotton Farming Project**

Summary Consultation Report

16 December 2020



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# Uzbekistan: Cotton Farming Project

## Summary Consultation Report

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# Contents

1	Introduction	9
2	ESIA Disclosure Process	10
2.1	General principles and approach overview	10
2.2	Disclosure in Uzbekistan	10
2.2.1	Specific approach during COVID-19 restrictions	10
2.2.2	Project SEP	11
2.2.3	Community Liaison Officers	11
2.2.4	Local community representatives	11
2.2.5	Women's Affair Committees	12
2.2.6	Confidentiality and anonymity	13
2.2.7	ESIA feedback mechanism for communities	13
2.3	Table 2.2 International disclosure	15
2.4	Disclosure of the final ESIA package	15
3	ESIA Disclosure Outcomes	17
3.1	Feedback received from the affected communities	17
3.2	Comments received from NGOs and other interested stakeholders	21
3.3	New stakeholders identified during the Draft ESIA Disclosure and Consultation Period	23
4	Conclusions	24
	Appendices	26
A.	Amended Draft ESIA Disclosure Programme in the i-SEP	27
B.	Project Leaflet	31
C.	ESIA Feedback Form	34
D.	Mahallas Approached during the Draft ESIA Disclosure	35
E.	TV Consultation Advertisements Programme	39
	Syrdarya region TV adverts programme	39
	Kashkadarya region TV adverts programme	39
F.	ESIA Comments on Raised Concerns	40

## G. Updated Project Stakeholders Matrix 45

### Tables

Table 2.1: Project Community Liaison Officers during the ESIA disclosure period	11
2.3 Table 2.2 International disclosure	15
Table 2.3: Contact details to request hard copies of the full ESIA documentation	15
Table 3.1: ACs in Kashkadarya region subject to quarantine restrictions coincided with the Draft ESIA consultation period	17
Table 3.2: Positive and negative opinions of the Project	18
Table 3.3: NGOs and local human rights activists	21
Table 3.4: Feedback from NGOs/CSOs/human rights activists received during the ESIA consultation	21

### Figures

Figure 3.1: Respondents from the ACs in the ESIA consultation by region and gender	17
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# List of Abbreviations

Abbreviation	Description
ACs	Affected communities
CLOs	Community Liaison Officers
Company	FE "Indorama Agro" LLC
CSR	Corporate Social Responsibility
CSOs	Civil society organisations
GIP	Good international practice
GoU	Government of Uzbekistan
ILO	International Labour Organization
i-SEP	Interim Stakeholder Engagement Plan
IFC	International Financial Corporation
EBRD or Bank	European Bank for Reconstruction or Development
EHS	Environment, health and safety
ESAP	Environmental and social action plan
ESIA	Environmental and social impact assessment
NGOs	Non-governmental organisations
NTS	Non-Technical Summary
Project	Cotton Farming Project of Indorama Agro LLC in Uzbekistan
PRs	Performance Requirements
PSs	IFC Performance Standards on Environmental and Social Sustainability
RoU	Republic of Uzbekistan
SCR	Summary Consultation Report
SEP	Stakeholder Engagement Plan



# 1 Introduction

This Summary Consultation Report (SCR) focuses on describing the information disclosure, public consultation and participation activities during the disclosure period the Environmental and Social Impact Assessment (ESIA) for the cotton farming project of FE “Indorama Agro” LLC (the Company) with operations covering Kashkadarya and Syrdarya regions of Uzbekistan (the Project).

The Draft ESIA disclosure and consultation, although challenged by the COVID-19 limitations, continues the stakeholder engagement and disclosure process that accompanied the scoping and subsequently impact assessment phases of the ESIA process. For the previous stakeholder engagement and disclosure refer to Chapter 4 in Volume II (Impact Assessment) of the ESIA Report.

The SCR constitutes an integral part of the ESIA (it is included in Volume III – Appendices of the ESIA Report) and provides a summary of the disclosure and consultation process, the responses received from the affected communities (ACs) within the Project area and other interested stakeholders, and the outcomes of the disclosure period. It also discusses how the disclosure and consultation findings have been taken into account in the finalisation of the ESIA documentation, including Environmental and Social Management Plans and the Project Environmental and Social Action Plan (ESAP).

The SCR structure includes the following chapters:

- Chapter 1 – Introduction
- Chapter 2 – ESIA Disclosure and Consultation Process
- Chapter 3 – ESIA Disclosure and Consultation Outcomes
- Chapter 4 – Conclusions and Recommendations

## 2 ESIA Disclosure Process

### 2.1 General principles and approach overview

The ESIA disclosure and consultation approach of the Project is aimed at generally following the national requirement for informing the decision-making process based on the assessment of environmental hazard and proposals for mitigation, and the key principles of international lenders, namely:

- Early, ongoing and meaningful consultation with a full range of stakeholders
- Timely disclosure of transparent, easy to understand and accessible information, including information on potential adverse environmental and social impacts and risks, opportunities for sharing project benefits as well as mitigation and enhancement measures proposed
- Encouraging an open and respectful dialogue with the ACs and other stakeholders
- Provision of a grievance mechanism for the affected communities to raise their concerns and complaints or share opinions so that these are appropriately addressed

However, because of COVID-19 restrictions, a specific approach, involving no meetings and limited direct interaction, had to be developed, as detailed below.

### 2.2 Disclosure in Uzbekistan

#### 2.2.1 Specific approach during COVID-19 restrictions

The ESIA disclosure and consultation process was guided by general objectives of the Stakeholder Engagement Plan (SEP). The Project SEP was produced at the ESIA scoping phase and updated for the ESIA disclosure period. The ESIA documents including the SEP and Project Leaflet in Uzbek and English were published on the Company's website (<http://www.indorama-agro.com>) on 24 April 2020.

The COVID-19 restrictions delayed the start of the proactive outreach informing stakeholders about the disclosed documentation and inviting feedback. It was not possible to deliver the planned public events with the ACs in the Project regions during the disclosure period and alternative means for engagement were therefore deployed. The overall disclosure period was extended to 96 days, ending on 30 July 2020, in order to ensure meaningful consultation took place in spite of the limitations.

Due to limited access to internet and smartphones in Uzbekistan<sup>1</sup> and the Project affected areas, alternate approaches for engagement have focused on disclosing information to affected stakeholders by means of paper Project flyers and feedback forms as well as advertisements via popular television channels. The focus was on increasing television communications to ensure wider dissemination and outreach. Video advertisements were prepared by the Company and broadcast via local TV channels in the Project regions (refer to Section 2.2.7 for details).

Interested human rights activists, non-governmental organisations (NGOs) and civil society organisations (CSOs) were engaged by e-mail and telephone as they had sufficient internet connectivity to access the ESIA documents.

A tool was provided for such NGOs/CSOs/human rights activists to comment of the Draft ESIA documentation via the Company's e-mail box ([info@indorama-agro.com](mailto:info@indorama-agro.com)) and their feedback is summarised in section 3.2 below.

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<sup>1</sup> In 2018, smartphone penetration in Uzbekistan stood at just over 30% and the number of internet users was around 52%.

## 2.2.2 Project SEP

The challenges posed by the COVID-19 pandemic starting in March 2020 as well as the flooding disaster that severely affected Sardoba district communities in May 2020 meant that the schedule details in the original SEP could not be followed (refer to Appendix A for amendments to the SEP programme). In response, an Interim Stakeholder Engagement Plan (i-SEP) was developed in April 2020 to ensure continued meaningful stakeholder engagement during the COVID-19 crisis, including during the Draft ESIA disclosure period. This considered respect of mandatory social distancing measures, travel restrictions, and restrictions on public meetings and gatherings stipulated by the Government of Uzbekistan (GoU).

The i-SEP was published on the Company’s website (<http://www.indorama-agro.com>) with the other Draft ESIA documents (together the “ESIA package”). Once the restrictions currently in place are lifted, the Company will revert to implementing the detailed Project SEP during the project implementation phase.

The updated Project SEP will be disclosed with the Final ESIA documents via the Company website <http://www.indorama-agro.com> and internationally as described in Section 2.3.

## 2.2.3 Community Liaison Officers

The Company has appointed two Project Community Liaison Officers (CLOs); one for each of Kashkadarya and Syrdarya regions to lead the ESIA disclosure process in four Project districts, with two assistants for each CLO.

**Table 2.1: Project Community Liaison Officers during the ESIA disclosure period**

Contacts	Project CLO in Kashkadarya region	Project CLO in Syrdarya region
Company:	FE “Indorama Agro” LLC, Kashkadarya Branch	FE “Indorama Agro” LLC, Syrdarya Branch
Name:	Ravshan Tadjiev	Jasur Khusankhodjaev
Tel.:	+998905066863	+998998212000
Email:	<a href="mailto:rtadjiev@indorama.uz">rtadjiev@indorama.uz</a>	<a href="mailto:jkhushankhodjaev@indorama.uz">jkhushankhodjaev@indorama.uz</a>

Source: FE “Indorama Agro” LLC

An ESIA Disclosure Group headed by the Project CLOs and four assistants was established by the Company for the ESIA disclosure period. The Company used the Telegram app to facilitate prompt internal communication and coordination between the Project CLOs, their assistants, management of the branch offices and headquarters based in Tashkent – all being key members of the Group.

The CLOs were responsible for distribution of the Project flyers and feedback forms in the respective mahallas (refer to Appendix D for the full list of mahallas covered by the ESIA disclosure), publication of advertisements, arranging comment boxes, community liaison, receiving and channelling feedback from the ACs and other interested stakeholders in their respective regions.

A summary table with comments/concerns raised in the ACs during the ESIA disclosure period and the respective responses is included in Appendix F.

## 2.2.4 Local community representatives

For the ESIA disclosure process the Project CLOs liaised with the community self-government units in the Project area – the ‘mahallas’. Mahallas are chaired by elected “aqsaqals” of citizens’ assemblies and supported by advisers and consultants (advisers on elderly and veteran, youth and women affairs, advisers on religious education, community safety, sports, etc.).

The mahallas were used to reach those members of the communities adjacent to the Project who do not have access to the internet, such as the elderly or poor households and other vulnerable groups (the disabled, jobless, etc.).

Two weeks prior to the distribution of the Project leaflets and feedback forms in the mahallas, the CLOs initiated meetings with the mahallas in Kasbi, Nishon, Sardoba and Oqoltyn districts about the importance of the leaflets and feedback mechanism. These meetings lasted for one week starting from June 1, 2020. The mahallas were requested to provide assistance in disclosing the Project flyers and feedback forms (all prepared in Uzbek language). The mahallas encouraged community participation in the ESIA consultation process and invited feedback from their communities via comment boxes. In total 49 comment boxes were installed across the Project area as referenced in Appendix D). All feedback forms were channelled to the CLOs by their assistants who collected and registered comments.

After the Draft ESIA disclosure period is closed and the ESIA package is finalised, the mahallas in the Project area will also be provided with the access to the hard copies of the non-technical summary of the final ESIA (NTS), final SCR and final SEP in Uzbek language to make them available to the local communities upon request. The distribution of hard copies may take some time and will only be possible if no pandemic-related quarantine measures are in place for the respective mahallas. It is estimated that distribution will occur before the end of 2020.

### 2.2.5 Women's Affair Committees

Each mahalla operates a Women's Affair Committee that supports and represents the interests of the local women living in the affected communities. The representatives of these committees were involved in all coordination meetings in mahallas to encourage participation of women in the public consultation and explain to them the feedback mechanism used in the ESIA disclosure campaign. As a result, 1,908 women in the two regions (or 32% of the total respondents who indicated their gender in the feedback form) participated in the disclosure process and provided their responses and suggestions.

**Photo 2.1: Disclosure with the Women's Affair Committee in Shodlik mahalla, Oqoltyn district**



Source: FE Indorama Agro LLC

### 2.2.6 Confidentiality and anonymity

The Project aims to protect stakeholders' confidentiality when requested and guarantees anonymity in disclosing the feedback on the Project received from local communities. No grievances were received from communities via the grievance mechanism during the ESIA disclosure period. Nevertheless, when grievances are received, individuals will be asked for their permission to disclose their identity if this helps the resolution of a particular grievance. Investigations on grievances will be undertaken in a manner that is respectful of the aggrieved party and based on the principle of confidentiality. Reprisals will not be tolerated under any circumstance.

### 2.2.7 ESIA feedback mechanism for communities

The web-based ESIA disclosure took place on 24 April, 2020 and coincided with the GoU-imposed ban on public gatherings<sup>2</sup> and restrictions on movement within the Project-affected districts resulting in additional time being needed for adopting the consultation approach under the constraints of the COVID-19 restrictions. However, the proactive outreach and distribution of Project leaflets and feedback forms in the ACs started on the 1 June 2020 after restrictions on movement had been partially lifted<sup>3</sup> in the Project districts, which allowed for small gatherings in the mahallas with social distancing and protective masks. The ESIA disclosure and consultation period ended on the 30 July 2020.

As described in section 2.2.1, alternate approaches for community engagement were used and focused on distribution of the Project flyers (Appendix B) and ESIA feedback forms (Appendix C) via the mahallas. The Project also placed advertisements in the mahallas in the ACs and Project offices to make sure that directly affected individuals such as farmers, women, seasonal workers and Indorama staff were aware of the distribution of the Project leaflets and feedback forms in the mahallas and invited to comment.

The ESIA feedback form invited comments on any issues/gaps that have not been addressed sufficiently or appropriately in the ESIA and suggestions on how to respond to such gaps in the ESIA document. The feedback form gave the option for stakeholders to provide their contact details or to submit the form without contact details, thereby remaining anonymous. The mahallas made the leaflets and feedback forms available in hard copies in their buildings for those people who decided to come and pick them up in person and distributed them during two weeks among households who could not come (e.g., the disabled, elderly and people with mobility issues, etc.). Comment boxes and ESIA feedback forms have been provided in all locations of the Project to allow for comments to be submitted, including anonymous comments.

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<sup>2</sup> According to the Ministry of Health of the Republic of Uzbekistan the ban on public gatherings for all regions was introduced on March 23, 2020 and lasted to August 15, 2020.

<sup>3</sup> According to the Ministry of Health of the Republic of Uzbekistan, restrictions on movement within the Project districts were introduced on 23 March 2020, partially lifted on May 15, 2020 and fully lifted on August 17, 2020

**Photo 2.2: Comment box in Ahilik mahalla, Oqoltyn district**



Source: FE "Indorama Agro" LLC

**Photo 2.3: Collecting community feedback in Nishon district**



Source: FE "Indorama Agro" LLC

A telephone number and email address for the local CLO have also been provided. Comment boxes were also installed in the Company office in Karshi, Nishon, Oqoltyn and Sardoba districts and two gin plants to allow comments by the Indorama staff who in their majority are residents of the local communities.

With a focus on reaching out to the affected stakeholders, video announcements were made on local television – Uzbekistan TV and Syrdarya TV. Both are widely watched TV channels in the respective regions. The announcements were featured for six days in each region during one month between 22 June and 22 July 2020, six times a day at prime time in the mornings and in the evenings so that local people including individuals with literacy issues were made aware of and invited to participate in the consultation (refer to Appendix E for the details of the TV advertisement programme).

**Photo 2.4: Comment box in the Sardoba Office of FE “Indorama Agro” LLC in Sardoba district**



Source: FE “Indorama Agro” LLC

**Photo 2.5: Distribution of the Project flyers and ESIA feedback forms among local households in Kasbi district**



Source: FE “Indorama Agro” LLC

Comments were collected up to 30 July 2020. Community disclosure outcomes are described in Chapter 3, section 3.1.

### 2.3 Table 2.2 International disclosure

The ESIA package was disclosed on the EBRD ([www.ebrd.com](http://www.ebrd.com)) and IFC ([www.ifc.org](http://www.ifc.org)) websites starting from 24 April 2020 in English and Uzbek language for the duration of the Project in accordance with the EBRD Environmental and Social Policy and IFC Environmental and Social Sustainability Policy. One comment was received by the EBRD through this mechanism as detailed below in section 3.2.

### 2.4 Disclosure of the final ESIA package

Following the 96-day disclosure period and the updating of the ESIA to address stakeholders and Lenders’ comments and queries, the ESIA documentation is being finalised. The final ESIA package will be disclosed on the Company and Lenders’ websites in September 2020.

Once the COVID-19 restrictions are lifted, hard copies of the full ESIA documentation will be made available locally at the locations detailed in Table 2.3:

**Table 2.3: Contact details to request hard copies of the full ESIA documentation**

No.	Location	Contact details
1.	FE Indorama Agro LLC Tashkent office 11/1 Amir Temur Avenue, Mirobod district	Mr. Amit Jain Tel: +998 909 630 155

No.	Location	Contact details
	100100 Tashkent, Republic of Uzbekistan	Email: a_jain@indoramaglobal.com
2.	Karshi office of FE Indorama Agro	Mr. Ravshan Tadjiev Tel: +998 905 066 863 Email: rtadjiev@indorama.uz
3.	JSC Kasbi Paxta Tozalash	Muglon, Qashqadaryo Region Republic of Uzbekistan
4.	Syrdarya office of FE Indorama Agro	Mr. Jasur Khusankhodjaev Tel: +998 998 212 000 Email: jkhusankhodjaev@indorama.uz
5.	Sardoba Gin in Oqoltyn district	Sardoba city Gulistan-Gagarin Main Road Zip code 120500
6.	EBRD Resident Office in Tashkent	Tel: +998 78 140 44 00 3 <sup>rd</sup> floor, Banking Association of Uzbekistan 1, Qoratosh Street, Tashkent, 100027 Republic of Uzbekistan

For environmental, social or general enquiries please contact FE Indorama Agro LLC via:

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Tel: +998 71 2332264

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E-mail: [Info@indorama-agro.com](mailto:Info@indorama-agro.com)

[www.indorama-agro.com](http://www.indorama-agro.com)



## 3 ESIA Disclosure Outcomes

### 3.1 Feedback received from the affected communities

In total 16,470 flyers and feedback forms were printed and distributed by the Company across the Project area (including 4,000 in Syrdarya region and 12,470 in Kashkadarya region). The 49 mahallas were approached initially and feedback forms and comment boxes placed in mahalla buildings were provided to them to encourage community participation. Seven communities in Kasbi and Nishon districts (Kashkadarya region) or 3% of the total ACs approached, could not participate by providing their comments or opinions on the ESIA package because the quarantine restrictions in these ACs (refer to Table 3.1 for details) coincided with the Draft ESIA consultation period.

**Table 3.1: ACs in Kashkadarya region subject to quarantine restrictions coincided with the Draft ESIA consultation period**

ACs in Kasbi district	ACs in Nishon district
Mustakilobod	Yangiobod*
Okjangal	
Maymanok	
Korakungirotd	
Kungirotd	
Pandiron	

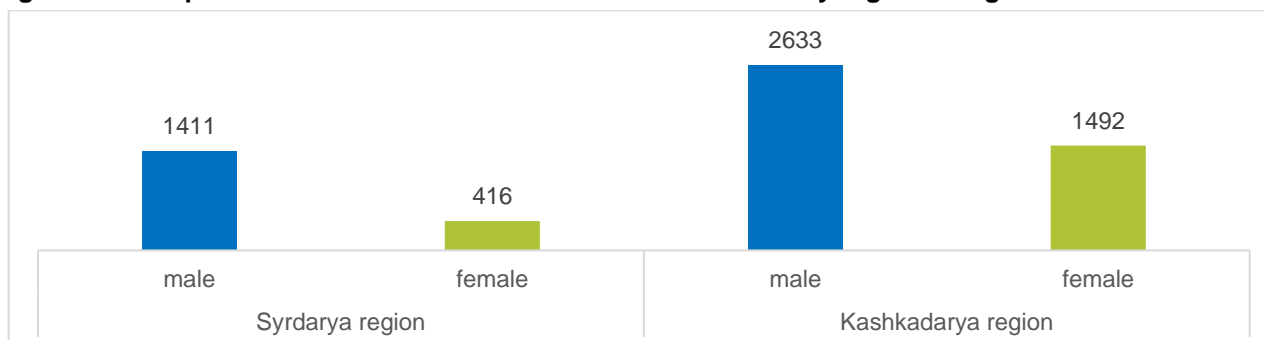
Source: FE "Indorama Agro" LLC

\* Only six people in Yangiobod (all male) were able to comment before quarantine started.

The Company will keep comment boxes and feedback forms in these seven ACs and as soon as restrictions are lifted people may share their comments on the Project.

In total 6,210 people from the ACs provided their comments on the Project or general feedback or requests. Nearly one-quarter (23%) of respondents in Syrdarya region were female and 36% of respondents were female in Kashkadarya region. It is expected that the actual ratio for women's participation is slightly higher considering that 258 (4%) respondents in Kashkadarya region (with higher ratio for female engagement) have not indicated their gender.

**Figure 3.1: Respondents from the ACs in the ESIA consultation by region and gender**



Source: FE "Indorama Agro" LLC

Of the total comments received, only 902 (15%) respondents clearly expressed their opinion of the Project. Of these, the majority (89%) stated the positive impact of the Project (refer to Table 3.2). However, women in Kashkadarya region were less positive about the Project (in total 67% of women with positive opinion), commenting on low salaries and unemployment among women, expressing their concerns in the use of fertilizers and chemicals in cotton farming resulting in adverse impact on the environment and occupational health and safety (OHS) issues. About 92% of all male respondents were positive about the Project. The key negative comments from men in the affected communities were associated with low salaries and delays in paying salaries, international staff employed on local jobs, extensive use of chemicals as well as community disturbance and odour.

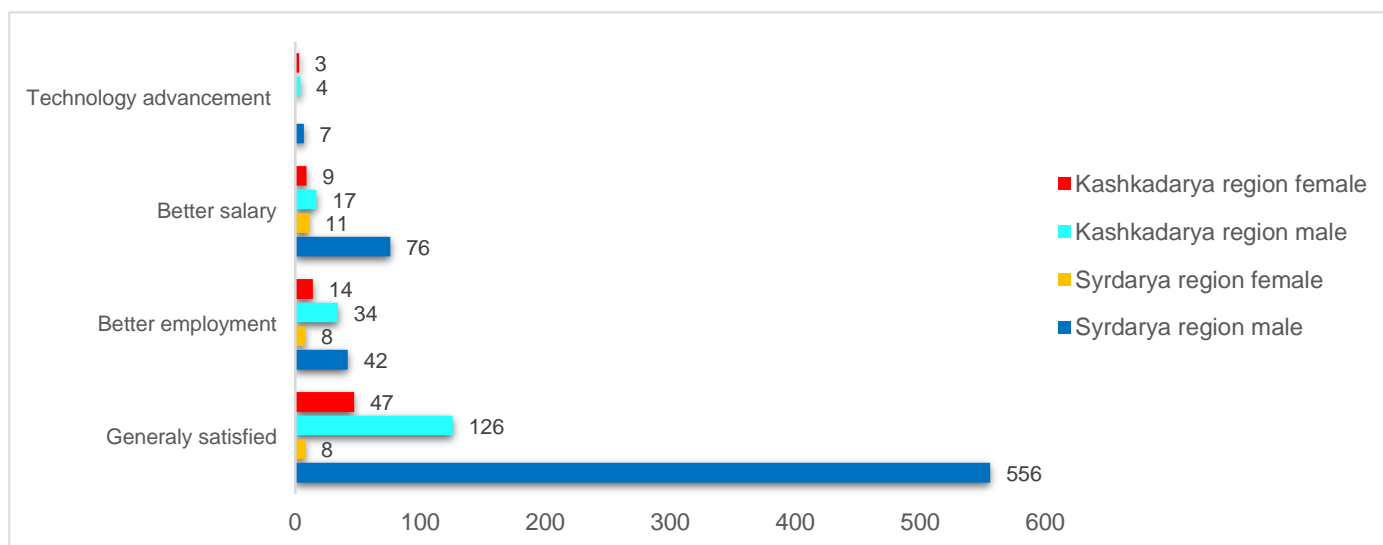
**Table 3.2: Positive and negative opinions of the Project**

Topic	Syrdarya region		Kashkadarya region		Total		
	men	women	men	women	men	women	all
Positive about the Project	554 (97%)	27 (96%)	150 (77%)	72 (67%)	<b>704 (92%)</b>	<b>99 (73%)</b>	<b>803 (89%)</b>
Negative about the Project	17 (3%)	1 (4%)	46 (23%)	35 (33%)	<b>63 (8%)</b>	<b>36 (27%)</b>	<b>99 (11%)</b>
<b>Total</b>	<b>571 (100%)</b>	<b>28 (100%)</b>	<b>196 (100%)</b>	<b>107 (100%)</b>	<b>767 (100%)</b>	<b>135 (100%)</b>	<b>902 (100%)</b>

Source: Community feedback in the Draft ESIA consultation, June-July 2020

The mainly positive feedback demonstrates a largely positive perception of the Project presence in the ACs. Key perceived benefits are associated with the modern technology that the Project brought in the cotton farming, better employment and incomes. Key topics of the positive feedback are summarised in Chart 3.1 below.

**Chart 3.1: Positive feedback of the Project from the ACs<sup>4</sup>**



Source: Community feedback in the Draft ESIA consultation, June-July 2020

The review of the feedback provided has identified ten key categories of community concerns:

1. Community disturbance and odour
2. Unemployment in communities and lack of local jobs, including jobs for women and young adults
3. Low salaries and delays in paying salaries

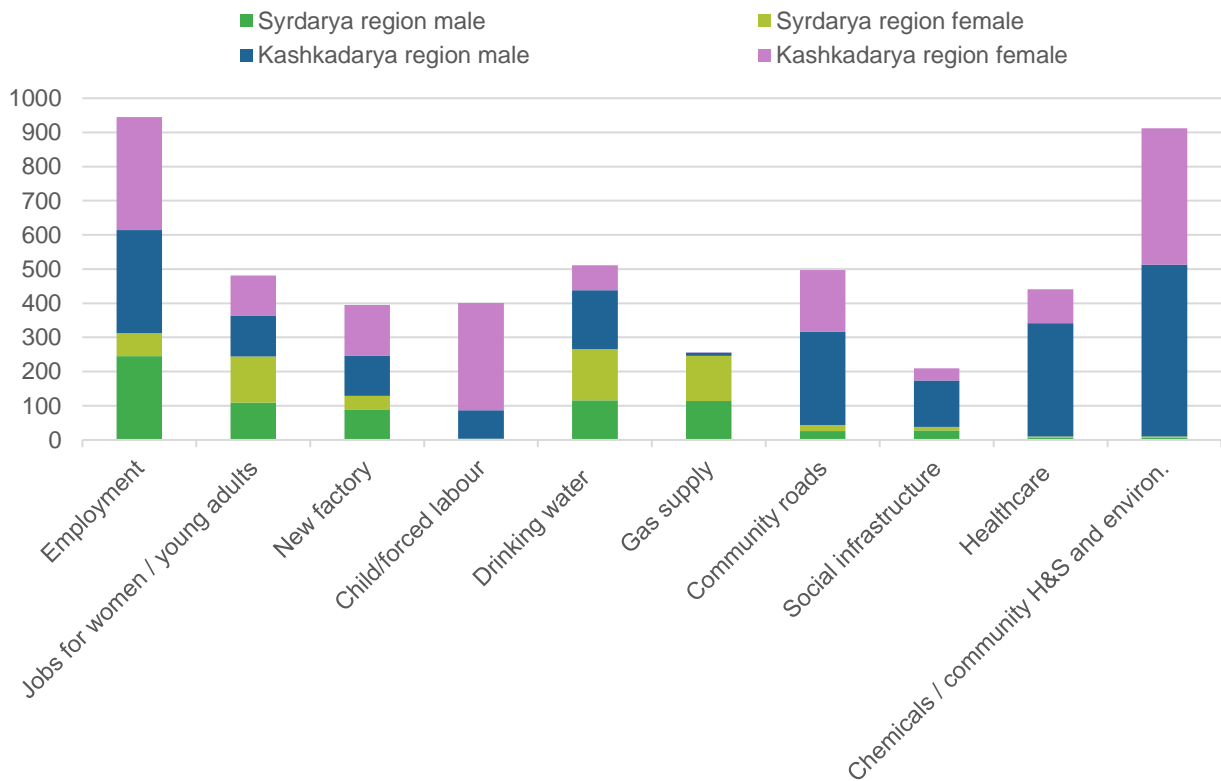
<sup>4</sup> Some respondents stated in their feedback several benefits associated with the Project and these were treated under different topics as summarised in the chart.

4. Lack of public utilities in communities (water, electricity and gas supply networks)
5. Availability of water
6. Use of hazardous chemicals (herbicides) by the Project and impact on the environment
7. Impact on community health and safety (H&S) (use of pesticides and agrochemicals)
8. Occupational health and safety (use of agrochemicals)
9. Poor public and social infrastructure (community roads, schools, healthcare facilities)
10. Impact on livelihoods (reduced supplies in fodder/straw and dry cotton plants used as fuel by local communities)

All of the aforementioned issues have been considered by the impact assessment and respective comments are provided in Appendix F with the reference to mitigation measures envisaged in the ESIA and ESAP.

The majority of the 6,210 respondents (85%) used the ESIA consultation as a mechanism for requesting individual support or investments in social infrastructure and utilities in their communities rather than commenting on the ESIA itself and the gaps in assessment and proposed mitigation. Ten key improvement topics have been identified from the communities’ feedback: (i) enhance local employment, (ii) enhance community H&S (use of hazardous chemicals), (iii) eradicate child and forced labour, (iv) provide connection to tap water supply infrastructure, (v) provide connection to gas supply infrastructure, (vi) enhance healthcare services in communities, (vii) jobs for women and young adults, (viii) rehabilitate/construct community roads, (ix) rehabilitate/construct social infrastructure (nurseries, schools, colleges, libraries, playgrounds, etc.) and (x) increase cotton processing facilities (build a new factory). Chart 3.2 below illustrates the community proposals for improvement, disaggregated by the Project regions and respondents’ gender.

**Chart 3.2: Top ten community improvement suggestions segregated by region and gender**



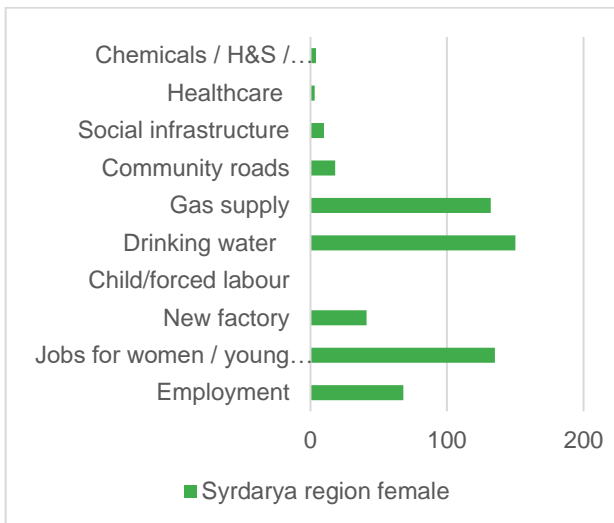
Source: FE “Indorama Agro” LLC

The communities' perception of the proposed improvement measures varies between the two Project regions. The key expectation of the ACs in both regions is associated with the employment opportunities that can be enhanced if a new manufacturing facility starts operation in the neighbourhood and offers more jobs for the local households. Respondents from both regions (53 respondents in total) also commented on the employment opportunities with the Project for young adults as there are no jobs for young people in the ACs.

The feedback from women in Syrdarya region indicates a big demand for improvements associated with the public utilities so that their houses are connected to tap water and gas supply services. The women from the ACs also prioritise jobs that are made available specifically for women (Chart 3.3).

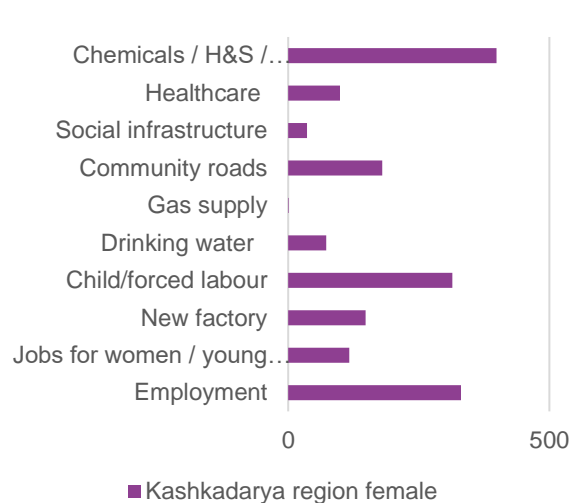
The women from Kashkadarya region suggest that the control over use of chemicals, local employment and prevention of child and forced labour are the priority issues that the Project is expected to address (Chart 3.4).

**Chart 3.3: Suggestions for improvement by women, Syrdarya region**



Source: Community feedback in the Draft ESIA consultation, June-July 2020

**Chart 3.4: Suggestions for improvement by women, Kashkadarya region**

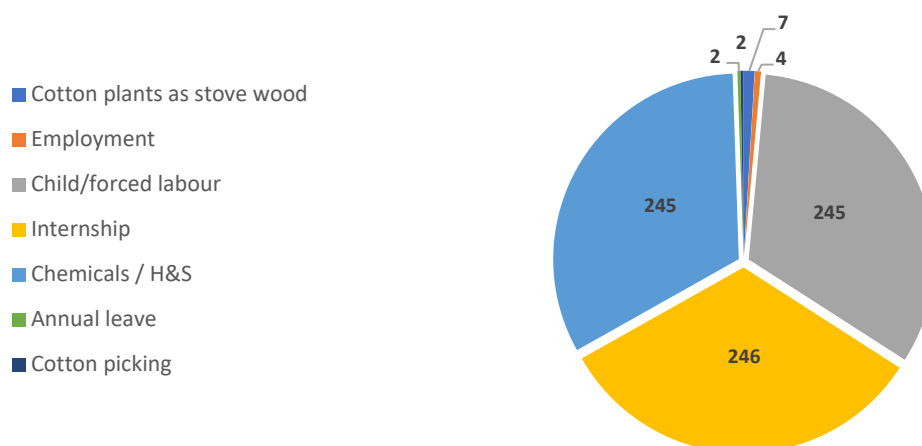


Source: Community feedback in the Draft ESIA consultation, June-July 2020

Unspecified gender respondents also provided their comments/suggestions for improvement.<sup>5</sup> Top three improvement topics suggest (i) possibility for internship in the Company; (ii) enhancement in the use of hazardous chemicals as these adversely impact human health; (iii) support in eradicating child labour and forced labour in the Project area (Chart 3.5).

<sup>5</sup> Most of respondents stated in their feedback several benefits associated with the Project and these were classified under different topics as summarised in the chart.

**Chart 3.5: Unspecified gender comments**



Source: Community feedback in the Draft ESIA consultation, June-July 2020

The feedback review has identified that most of the comments do not refer to the direct Project impacts or mitigation measures but identify the areas where the Project need to focus on community investment and stakeholder engagement and participation, specifically as it relates to monitoring and information disclosure.

The impact on households’ livelihoods is clearly reflected in the feedback received from local communities. Recognising that the Project will not be able to provide employment for many of the directly affected households, the Project Livelihood Restoration Plan remains the key management plan for mitigating economic displacement as it focuses on livelihood restoration activities related to the agriculture sector.

### 3.2 Comments received from NGOs and other interested stakeholders

FE “Indorama Agro” LLC consulted interested stakeholders to ensure that stakeholders who would have been able to participate in the public exhibition events under normal circumstances were also able to provide their feedback on the ESIA and ESAP package.

The table below summarises stakeholders approached in the ESIA disclosure process.

**Table 3.3: NGOs and local human rights activists**

NGOs/CSOs	Local human rights activists
Farmers’ Association	Shuhrat Ganiev
Uzbek-German Forum for Human Rights	Elena Urlaeva
Anti-Slavery International	Zohid Zokirov
International Labor Rights Forum	Arslabai Utepov
NGO “Bankwatch”	

Source: FE “Indorama Agro” LLC

In total nine comments/questions about the Project, ESIA package, consultation and disclosure process were received from Bankwatch and local human rights activists. These and the Company’s responses are detailed in Table 3.4 below.

**Table 3.4: Feedback from NGOs/CSOs/human rights activists received during the ESIA consultation**

No.	Comment/question received	Response provided by the Company
	NGO “Bankwatch”	

No.	Comment/question received	Response provided by the Company
1.	When do you plan to finish the public consultations and prepare an initial response summary?	We will close it by 30 July 2020 and an initial response summary should be available by 10 August 2020 <sup>6</sup>
2	Will it be available for the public?	The summary comment and response table will be made public together with the finalised ESIA package.
3	Could you please share the indicators or expectations you have for the public engagement (e.g., a number of respondents, specific groups involvement, specific locations, etc.)?	We have not set ourselves specific targets given the uncertainty caused by the COVID-19 restrictions in place. However, we will look at the numbers and diversity of respondents in our four districts and on this basis, we will be able to determine whether there are any gaps in coverage. As restrictions continue to be in place, we have a limited set of engagement tools at our disposal and we do not know how much more can be achieved in the absence of face-to-face interactions. However, as stated previously, stakeholder engagement is an iterative process, which will continue after the disclosure period ends
<b>Shuhrat Ganiev – local human rights activist</b>		
4	Regarding the draft ESIA package and measures for the disclosure of information on environmental and social impact assessment: "Here I was very interested in the Feedback Mechanism and its scheme ... I also propose if it is possible to include GM human rights defenders in the presented scheme as persons of the complaint providers and considering the effectiveness of the response to them. The inclusion of representatives of the Civil Community in the feedback mechanism will give confidence in increasing transparency and increasing the degree of trust in the project"	We welcome any suggestions as proposed by human rights activists and will consider them on the basis of their practical implementation. The feedback mechanism will be open to all the stakeholders and the Company will take effective measures to ensure transparency of the process and its results.
5	Regarding the Project ESAP: "Monitoring the risks and impacts associated with the environment, the social sphere, health and safety is of interest to the members of the GM and I believe we could monitor in partnership with the first two parameters. Thank you again for your trust on the part of Indorama and with the hope of cooperation"	The ESAP consists of various aspects related to environment, social, H&S aspects, etc. And monitoring of the ESAP implementation will be done by third parties to ensure neutrality. We are open to evaluate the merits including human rights activists to monitor areas where they may have relevant specialisation and contribute in a positive way to the process.
<b>Elena Urlaeva – local human rights activist</b>		
6	"The situation in the regions with cotton is not good for farmers, they are forced to grow cotton, everything continues secretly on rutted tracks, farmers are not profitable for cotton at all, there is no drinking water in the regions it is environmentally disadvantageous. I personally oppose cotton planting, all the shops are clogged with clothes, not to mention the bazaars, rural people are hungry, water does not reach the Aral because of cotton, why should we act against health for the benefit of American brands. This looks like a new project and we didn't finish the old one."	The Project undertakes optimized water use as a key objective. The intent is to get maximum crop for every drop. This shall be achieved through modern laser land levelling techniques together with improved water irrigation infrastructure. This will reduce current water transmission and application losses. Further, developed fields will result in improved yields, which is expected to reduce the current arable land allocated to cotton in future. This will allow diversity of crops and reduced pressure on water. We should also keep in mind that the textile industry is one of the largest employment-generating sectors. It is not a matter of brands only, but it is a matter of thousands of people who are earning their livings from this sector.
7	"Did I understand Indorama correctly that the project 36098 with a loan of up to 40 million US dollars of the IFC project with the client Indorama with the expansion of a textile plant in the Fergana Valley was recognized as problematic and therefore a new Indorama project with the EBRD bank with project areas in Kashkadarya and	a) The comments about Project 36098 are neither correct nor relevant to the current Project as both are two independent projects. This project is aiming to apply modern technology and farming practices. This project also aims to bring efficiencies to the agriculture sector, thereby reducing costs and increasing output with optimum and sustainable utilization of resources. There are no plans to merge the two Projects referred to. Any activity which will be done by the project

<sup>6</sup> Due to reopening of COVID-19 restrictions in Uzbekistan, response summary will be available in September 2020. The Company has updated the NGO "Bankwatch" on expected dates for release of the updated ESIA and the Summary Consultation Report.

No.	Comment/question received	Response provided by the Company
	<p>Syrdarya regions entered the country. Question – If it is possible to give legal expertise to the merger of these two projects and whether our monitoring in Kashkadarya and Syrdarya regions will be legal.</p> <p>To what extent, according to the available information, the farmers in the indicated areas of the new project are independent of state quotas - quotas are in effect, but this is secret information if the farmers let it out, they are threatened with taking away land and being imprisoned for loans.”</p>	<p>will be under legal framework of this country and there are no current restrictions on independent monitoring.</p> <p>b) We are not aware of any quota. Financing of any farmer having contract with the Project Company is being done by the Project Company and the farmers are under no obligation to the State or any other third party. So, there is no purpose of governmental intervention or threat in imprisonment for loan. For any default by either party, existing legal provision shall apply. The farmers are given land on lease by the government. The Project Company checks the lease rights of farmers whom we are contracting, are having a valid lease agreement in place which will help farmers in defending their rights under the legal system of this country.</p>
<b>Zohid Zokirov – local human rights activist</b>		
8	<p>Please tell me know if there will be permission from Indorama for our participation in the monitoring of the new cotton farming project?</p>	<p>Under the ESAP, monitoring of the project harvesting will be done with participation of various agencies including International Labour Organization (ILO). This ESAP is not a permission to do monitoring. It puts responsibility on the Project to ensure that monitoring should be conducted. We are working with ILO to formulate a monitoring methodology to create local capacity of independent monitors who shall be engaged in the monitoring.</p> <p>The ESAP consists of various aspects related to environment, social, H&amp;S aspects, etc. And monitoring of the ESAP implementation will be done by third parties to ensure neutrality. We are open to evaluate the merits including human rights activists to monitor areas where they may have relevant specialisation and contribute in a positive way to the process.</p>
<b>Arslabai Utepov – local human rights activist</b>		
9	<p>What does the Indorama cotton farming project expect from the Group i mediation in terms of the new project: do they need third party monitoring (that I believe should be done by human rights activists) for the new project to be sustainable?</p>	<p>FE “Indorama Kokand Textile” JSC aims to source cotton from the Project Company without having any risk poor labour practices in the supply chain. Hence, the Project aims to engage independent monitors who shall carry out the work under the methodology determined by ILO and/or other independent organizations.</p>

Source: FE “Indorama Agro” LLC

### 3.3 New stakeholders identified during the Draft ESIA Disclosure and Consultation Period

During the ESIA disclosure and consultation period new Project stakeholders have been identified as follows:

- Local human rights activists
  - Shuhrat Ganiev
  - Elena Urlaeva
  - Zohid Zokirov
  - Arslabai Utepov
- NGOs
  - Bankwatch

All new stakeholders will be included in the Project SEP to ensure that consultation and disclosure with the key stakeholders continues beyond the ESIA process throughout the lifecycle of the Project. The young adults in the Project affected area are added in the vulnerable group of stakeholders taking into consideration comments that arrived from the ACs and on the basis that the young adults are experiencing difficulties in finding skilled jobs locally. The updated Project stakeholder analysis matrix is included in Appendix G.

## 4 Conclusions

The Draft ESIA disclosure and consultation is considered to have been effective in engaging all of the four Project-affected districts and has been largely positive in its outcomes. Despite the COVID-19 restrictions that coincided with the ESIA disclosure and consultation period, the Project managed to adjust the engagement programme for ensuring a large-scale outreach (6,210 people from the directly and indirectly affected communities) and promote participation of women (1,902 female respondents or 32% of the total respondents who indicated their gender in the feedback forms) in the consultation process under the circumstances associated with the pandemic. Almost all (97%) of the ACs approached in the ESIA consultation provided their feedback/comments/concerns associated with the Project.

In the post disclosure period, there will be targeted efforts to reach out to people who were not able to comment on the Project because of the pandemic's protective measures imposed by the government. Seven communities that were locked in quarantine in Kashkadarya region (Table 3.1) and were not able to share their comments on the Project will be able to share their feedback when quarantine restrictions are lifted. The Project will keep comment boxes and feedback forms in these seven ACs for this purpose. The Project CLOs will bring to these and other mahallas hard copies of the NTS, this SCR and SEP in Uzbek language to share the final ESIA findings, consultation outcomes as well as information of key Project stakeholders, forthcoming engagement programme and grievance mechanism. It is estimated that these documents will be shared before the end of 2020 subject to restrictions being lifted.

The feedback received from the ACs generally mirrors the findings of focus group discussions undertaken with the local farmers and the ACs during the ESIA assessment phase. The review did not identify any major, undiscovered issues or gaps that are likely to require modification to the Project, its impact assessment or the resulting Project ESAP.

The Project LRP is considered to be the key mechanism in mitigating economic displacement and promoting community engagement with the affected people. The Company will allocate qualified human resources and an appropriate budget to sustain LRP implementation, as well as ensure continuous internal and external monitoring and reporting, including to the interested NGOs/CSOs and human rights activists.

Young adults in the Project affected areas have been identified as a vulnerable group of stakeholders taking into consideration the ACs' comments regarding difficulties which the young adults are experiencing in finding employment locally. The proposed mitigation/enhancement measures will be updated in the ESIA Report in order to target economic opportunities and other benefits to this and other vulnerable groups.

The Project consultation and disclosure outcomes and this SCR will be included in the final ESIA package, which will be available to all interested stakeholders before the end of 2020. Local human rights activists expressed their interest in being engaged in third-party monitoring arrangements and have a particular interest in ensuring the Project avoids child and forced labour during the cotton weeding and harvesting season (April-November). The Project is committed to preventing any forms of child labour and forced labour in the Project supply chain or any other operations it will be dealing with. This commitment is included in the ESIA and Project ESAP. The Company will continue its engagement with all interested stakeholders including the ILO and other local civil society organisations on this matter during the Project lifetime as detailed through the consultation programme included in the SEP.

New Project stakeholders have been identified during the ESIA disclosure, including local human rights activists and NGOs (section 3.2) who expressed their interest in receiving the updates on the outcomes of the ESIA consultation process, proposed partnership for the Project monitoring activities or are in opposition to the Project. The Project SEP will be updated and disclosed as part of the Final ESIA package to these and other groups. The SEP will take into account the changes that are still occurring due to the pandemic and will



establish consultation mechanisms and grievance channels that are tailored to respond to any ongoing or future restrictions on social gatherings or physical movement in the Project areas.

# Appendices

A.	Amended Draft ESIA Disclosure Programme in the i-SEP	27
B.	Project Leaflet	31
C.	ESIA Feedback Form	34
D.	Mahallas Approached during the Draft ESIA Disclosure	35
E.	TV Consultation Advertisements Programme	39
F.	ESIA Comments on Raised Concerns	40
G.	Updated Project Stakeholders Matrix	45

## **A. Amended Draft ESIA Disclosure Programme in the i-SEP**

**Table A.1: ESIA Phase Engagement – Draft ESIA Report Disclosure**

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
Announcement of the forthcoming disclosure of the draft ESIA Package and the planned public exhibition events	<p>Two weeks prior to Draft ESIA Report presentation at the public exhibition event (before 20 April 2020).</p> <p>Adverts to be placed in local newspapers, on local radio, and Hokimiyats' web-sites for one week identifying dates and locations of the disclosed documents and the public exhibition events, and how to submit comments.</p> <p>Adverts will include links and addresses where draft ESIA Report and NTS will be accessible in electronic and hard copies.</p> <p>Letters of invitation to Hokimiyats, mahallas, environmental authorities and other Project stakeholders if relevant.</p>	The Project CLOs and Consultant.	<p>Within two weeks of the disclosure of the ESIA package (during the first two weeks of May 2020):</p> <ul style="list-style-type: none"> <li>• Adverts will be placed in local newspapers and on local radio and on Hokimiyats' web-sites identifying the online locations where the ESIA package has been disclosed and notifying the local affected communities of the forthcoming delivery of project leaflets and feedback forms to nearest mahallas.</li> <li>• Hard copies will not be available in public places due to the risk of contamination.</li> <li>• Email invitations for a video-call with interested NGOs to be sent two-weeks prior to such video-call occurring.</li> </ul>
Disclosure of the Draft ESIA Report and related documents	<p>At least two weeks prior to the public exhibition, for 60 days (target date is 20 April 2020).</p> <p>NTS document and Draft ESIA Report to be disclosed in Uzbek via the District Hokimiyats' web-sites in Project districts.</p> <p>NTS to be made available in hard copy in the ACs via mahallas in the same locations as the Project leaflet and SEP.</p> <p>Comment boxes and a feedback form will be provided in mahallas to allow for anonymous comments to be submitted.</p>	<p>The Consultant to prepare NTS and Draft ESIA Report in Uzbek language.</p> <p>The Project CLOs to post documents on the District Hokimiyats' web-sites in four districts and take NTS to the mahallas in hard copies.</p>	<p>Within four weeks of the disclosure of the ESIA package (during the month of May 2020):</p> <p>NTS document and Draft ESIA Report to be disclosed in Uzbek via the District Hokimiyats' web-sites in Project districts.</p> <ul style="list-style-type: none"> <li>• Project leaflet and feedback forms to be distributed to local affected communities through Local Mahallas whose details will be published and pasted on office of the Company.</li> <li>• Comment boxes will be provided in mahallas to allow for comments (including anonymous comments) to be submitted using the ESIA feedback form distributed to local affected communities.</li> <li>• Hard copies will not be available in public places due to the risk of contamination.</li> </ul>
Public exhibition events	<p>By 20 May 2020.</p> <p>Project exhibition events in Kashkadarya and Syrdarya regions will be arranged in all four districts. Events will be held in District Hokimiyats. Exact dates and time to be confirmed by the Consultant and agreed with the Company.</p>	<p>Event arranged and advertised by the Company with support from the Consultant.</p> <p>Event attended by the Consultant, Project CLOs, Company and Branch Managers, Environmental Specialist, PU Managers and other staff as deemed appropriate.</p>	<p>No public exhibition events will take place due to Covid-19 restrictions currently in place.</p> <p>As soon as Covid-19 restrictions are lifted, Indorama Agro will re-assess the possibility of conducting face-to-face consultation with local affected communities.</p>

	<p>Location and date to be announced in advert/announcement detailed above. Separate invitations will be sent to women's affair committees in mahallas as women's representatives to facilitate their participation in the exhibitions.</p> <p>The Company to present information about the Project and the findings of the ESIA as well as proposed mitigation measures.</p> <p>A comment boxes and feedback form will be provided to allow for anonymous comments to be submitted.</p>	<p>The CLOs to record meeting, attendance and collect feedback forms and report outcomes to the Consultant.</p> <p>The Consultant to lead the focus groups and report on findings.</p>	<p>Any such public meetings will be advertised widely at least two weeks before taking place.</p> <p>Based on the outcomes of the disclosure and consultation activities that have taken place while the restrictions were in place, Indorama Agro will also assess to what extent vulnerable persons in the local affected communities have been able to participate in the consultation process and undertake further consultation with vulnerable persons as necessary.</p>
Collecting comments and suggestions on the Draft ESIA Report	<p>Via grievance mechanism for the disclosure period after public exhibition event (till 20 June 2020).</p> <p>Feedback received by the Company will be forwarded to the Consultant for consideration by technical specialists and inclusion in revised the ESIA Report and/or related documents.</p> <p>Responses will be provided to each interested party presenting questions as soon as is reasonably possible depending on the complexity of the issue and source of information needed to provide the answer.</p>	The Project CLOs to collect and feedback to the Consultant.	<p>Feedback and comments on the ESIA Package will be collected via feedback forms (see Appendix B), which will be distributed to the households in the local affected communities.</p> <p>Anyone can provide their comments (including anonymously) by sending back the feedback form via postal mail or electronic mail, or by calling the Community Liaison Officers in Kashkadarya and Syrdarya (see contact information in the Project SEP).</p> <p>Feedback boxes will also be available at the local mahallas.</p>
Media communications	As requested, or when press releases deemed relevant.	The Project CLOs.	<p>This activity will be increased to ensure wider dissemination and outreach during the period when Covid-19 restrictions are in place.</p> <p>Regular updates will be shared via local newspapers and local radio in respective regions</p>
Disclosure of the Final ESIA package	<p>After the ESIA disclosure period is ended (total 60 days). Final NTS document and Final ESIA Report to be disclosed in Uzbek via the District Hokimiyats' websites in Project districts.</p> <p>Final NTS to be made available in hard copy in the ACs via mahallas in the same locations used for disclosure of the Draft NTS.</p>	<p>The Consultant to prepare the Final NTS and Final ESIA Report in Uzbek language.</p> <p>The Project CLOs to post documents on the District Hokimiyats' websites in four districts, make available in hard copy upon request as well as take NTS to the mahallas in hard copies.</p>	No changes required based on the assumption that Covid-19 restrictions will have been lifted by early July 2020.
Lenders Disclosure	Draft ESIA Report and related documents to be disclosed by Lenders in English and links to Company's disclosure provided (April 2020).	The Consultant to prepare the English version of the Final ESIA Report and disclosure package.	No changes required.

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Video/audio-call with interested stakeholders/NGOs/CSOs	n/a	n/a	In order to ensure that the interested stakeholders/NGOs/CSOs, who would have been able to participate in the public exhibition events under normal circumstances, are also able to provide their feedback on the ESIA package, Indorama Agro proposes to organise a video/audio-call following the first month of disclosure and no later than 2 weeks before the disclosure period ends (i.e. during the first two weeks of June 2020). The interested stakeholders/NGOs/CSOs, will share their concerns and issues via email beforehand to ensure focused discussion during video/audio-calls. Dates and invite for video/audio-call will be shared 7 days in advance.
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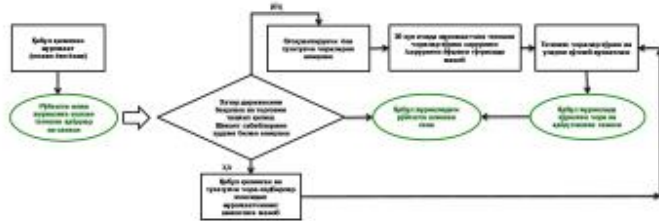
## **B. Project Leaflet**

**Feedback on the draft ESIA Disclosure Pack**

This leaflet along with a feedback form will be placed in all Mahallas and in Company's premises along with comment boxes for receiving written feedback during the 60-day disclosure period, which will end on June 22, 2020. To the extent possible, leaflets and feedback forms will also be distributed directly to the households in the Project communities. Comments can also be submitted via email, telephone or regular mail. Additionally, the feedback form can be downloaded from the Company's website and duly filled forms can be sent to the email addresses displayed below. Following the disclosure period, the comments received will be collated and considered in the finalisation of the ESIA.

**Project Grievance Mechanism**

Indorama Agro values the feedback from affected persons and interested stakeholders. The Company's grievance mechanism aims to provide an easily accessible, transparent and consistent process for submitting and processing complaints. All complaints will be treated confidentially and they can also be submitted anonymously (although we cannot respond to complaints directly where the complainant is not known). There shall be no negative repercussions for speaking up and retaliation against complainants will not be tolerated. We propose the following procedure:



All grievances (verbal or written) will be logged, acknowledged and investigated before a formal response is shared with the complainant. The procedure will be at no cost to Project affected persons and other stakeholders.

**Community Liaison Officers**

The Project has two assigned Community Liaison Officers ("CLOs") who will be responsible for liaising and communicating with the Project area communities in the two Project regions. The CLOs will be channelling and managing community feedback and grievances during Project planning, construction and operation in their respective regions. The CLOs will also maintain lines of communication with the affected communities on an ongoing basis.

The CLOs will summarise grievances weekly during construction and bi-annually during operation removing identifying information to protect the confidentiality of the complainants and guaranteeing their anonymity.

<b>Contacts</b>	<a href="#">Project CLO in Kashkadarya region</a>	<a href="#">Project CLO in Syrdarya region</a>
<b>Company:</b>	<b>FE Indorama Agro, Kashkadarya Branch</b>	<b>FE Indorama Agro, Syrdarya Branch</b>
<b>Name:</b>	<b>Ravshan Tadjiev</b>	<b>Ja sur Khusankhodjaev</b>
<b>Tel.:</b>	<b>+998905066863</b>	<b>+99898212000</b>
<b>Email:</b>	<b>rtadjiev@indorama-agro.com</b>	<b>jkhusankhodjaev@indorama-agro.com</b>

Comment boxes and grievance forms will be available in each Project area community.



# Indorama Cotton Farming Project

**About the Project**

**National Strategy and Cotton Farming Schemes**

The Government of the Republic of Uzbekistan has formulated a national strategy towards modernising the cotton sector and developing the textile industry via extensive involvement of the private sector in cotton farming. It aims to reduce the role of the State in the agricultural production, stimulate direct investment, introduce effective methods of cotton farming, and increase productivity and wages in the agricultural sector.

**Project Company**

In response to this strategy, Indorama Corporation Pte. Ltd. (the Sponsor) has started growing cotton to supply its existing spinning facility in Kokand (operated by JSC Indorama Kokand Textile, Uzbekistan). A project company – FE Indorama Agro LLC, Uzbekistan (the Company) was established by a subsidiary of the Sponsor to develop and implement the cotton farming scheme.

**Project Definition**

The Project will grow and process cotton, and grow wheat and mung bean or any other crops suitable for rotation with cotton.

**Project Location**

The Government of the Republic of Uzbekistan has allocated 54,000 hectares (ha) of cotton land to FE Indorama Agro LLC under 49-year lease agreements for direct cotton farming within the Kasbi and Nishon districts of the Kashkadarya region and the Sardoba and Oqotyn districts of the Syrdarya region. The land consists mainly of existing cotton farms re-allocated on a voluntary basis. Land parcels allocated to FE Indorama Agro LLC have been consolidated into 22 cotton-growing sub-districts. Along with FE Indorama Agro LLC direct cotton farming, a Contract Farming programme has been launched in Kasbi district in 2019, which has been extended further to Nishon district in 2020. The contract farming program in Kasbi and Nishon involves ten sub-districts covering the total area of 13,000 ha and 10,000 ha respectively.

**Project components**

- The Project will involve the following key components:
- Procurement of machinery and equipment for field works
  - Procurement of equipment for gin plants, depots and warehouses
  - Construction of gin plants, seeds de-linting and cotton seed chemical treatment facilities
  - Construct of two residential complexes in Karshi and Gulistan for staff and their families
  - Rehabilitation and construction of cotton and grain storages, storage for crop inputs, mechanical work shop, equipment parking yards
  - Restructuring and laser levelling of land plots
  - Rehabilitation of irrigation and drainage systems including construction of drainage water collection and recycling facilities, pumps etc.
  - Reclamation of abandoned fields, including desalination

New facilities will be connected to utilities: electricity, gas, water and sewerage.



#### Associated Project

The construction of a 5km power transmission line to connect the new ginning facility in Sardoba to electricity from the main grid constitutes an associated component of the Project.

#### Environmental and Social Impact Assessment

##### Requirements to Assessment and Programme

Financing for the Project will be sought from the European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC). The Project has undertaken an environmental and social impact assessment (ESIA) in line with their environmental and social policies and performance requirements and standards. The objective of this ESIA is to identify the likely impacts of the Project on the environment and people and propose mitigation to prevent or minimise adverse impacts and identify potential opportunities. The ESIA addresses effects arising from the construction, operation and decommissioning of the Project.

The ESIA was disclosed on 24.04.2020 for a period of 60 days to comply with the applicable international requirements and to collect opinions and comments on the draft ESIA findings and the Project from stakeholders. It is available online at the following address: <http://www.indorama-agro.com/news.php>

##### ESIA Phases and Deliverables

The ESIA Study involved two major phases: (i) Scoping and (ii) Assessment.

The Scoping Phase deliverables included:

- ESIA Scoping Report
- Stakeholder Engagement Plan

The Final ESIA Report contains the following volumes:

- Volume I – Non-Technical Summary
- Volume II – Main Assessment Report
- Volume III – Appendices – this includes supporting information, baseline studies and modelling outputs
- Volume IV – Environmental and Social Management Plan (ESMP).

The draft ESIA documentation was prepared and disclosed in Uzbek and English languages. Due to restrictions related to Covid-19, hard copies were not made available at this time.

##### Public Consultation

The initially planned public exhibition events in the four districts of the Project cannot be arranged as intended because public gatherings are not possible at the current time due to the Covid-19 crisis. Instead, we are presenting a summary of the findings of the draft ESIA in this leaflet and proposing to collect comments from the key Project stakeholders via the attached comments form that can be emailed back to us or deposited in the comment boxes made available at the nearest Mahallah office and Company offices. A list of key addresses will be displayed at all Mahallah offices, administration offices and Company's premises. Once restrictions on public meetings are lifted, Indorama Agro will reassess the need for any additional consultation meetings. Information about the availability online of the draft ESIA will be advertised in local newspapers, on local radio, and Hokimiyats' web-sites. Adverts will include links and addresses where the Draft ESIA and Non-Technical Summary will be accessible in electronic format. Comment boxes and feedback forms provided also allow for anonymous comments to be submitted.

#### Project Effects

Potential impacts from the Project were identified in the ESIA Scoping Study and their magnitude and significance assessed during the Assessment Phase.

The assessment of the significance of the effects and the identification of residual impacts took into account any mitigation measures already adopted by the Project as well as the extent and duration of change, the number of people affected by the changes and the size of the resources affected and their sensitivity to the change. The criteria for determining the significance of the Project impact are specific for each environmental and social aspect but, generally, the magnitude of each impact and the sensitivity of each receptor have been defined (quantitatively where possible).

##### Positive Environmental and Social Effects of the Project Identified in the ESIA

- Generation of permanent and temporary employment

- Training, improving skills and know-how transfer
- Procurement opportunities
- Local and regional economic development
- Improved irrigation water management
- Improved soil quality
- Reduction in air emissions
- Reduction in greenhouse gas emissions

##### Potential Environmental and Social Risks and Impacts

The following environmental and social issues were considered and their related risks and impacts outlined in the draft ESIA Report, along with an assessment of their significance and the identification of appropriate management measures:

- Labour and working conditions, including child and forced labour
- Community health, safety, security and well-being
- Occupational health and safety
- Socio-economic impacts, especially on women and vulnerable groups
- Disturbance/nuisance during construction and operation (including noise and vibration, dust, etc.)
- Influx of workers and population changes
- Land acquisition and economic displacement, including land re-allocation processes
- Air quality
- Hydrology
- Hydrogeology / land contamination
- Ecology
- Waste management
- Traffic and transport
- Cultural heritage

##### Proposed Mitigation Measures

The draft ESIA and ESMP identify the management measures aimed at preventing, minimising and/or mitigating adverse environmental and social impacts covering all the potential adverse impacts listed above. Separately, a Livelihood Restoration Plan has also been developed to address the economic displacement impacts of the Project. The ESMP identifies which environmental and social management and monitoring policies, plans and/or procedures will need to be developed by the Company. This includes contractor management, labour management, water resources, water quality, drainage water and wastewater management and monitoring, agrochemicals storage and handling, emergency preparedness, and biodiversity, among many others.

The Stakeholder Engagement Plan aims to ensure that affected and interested stakeholders are involved in providing feedback on the measures put forward in the draft ESIA and ESMP during the disclosure period and have access to grievance channels subsequently. Community Liaison Officers will be working with the local communities to ensure their concerns are heard and acted upon as necessary.

An environmental and social action plan (ESAP) has been developed by the prospective lenders and published in draft format as part of the ESIA disclosure package. It provides for the establishment of a dedicated environmental and social management team and the involvement of an independent environmental and social monitor. It also seeks to enhance women's access to project benefits through increased female employment.



## C. ESIA Feedback Form

<b>ESIA Feedback Form</b>	
<b>Reference Number:</b>	
<p><i>Please enter below your contact information and comments on the ESIA. This information will be dealt with as confidential. If you still wish to remain anonymous, please enter your comment / feedback in the box below without indicating any contact information – your comment / feedback will still be considered and addressed. Please be advised that no direct response will be provided to these comments. Responses will be compiled and published as part of the final ESIA Package to be published following the 6-day disclosure period.</i></p>	
<b>Full Name</b>	
<b>Contact Information</b>	By Post: Please provide mailing address
<b>Please identify how you wish to be contacted (mail, telephone, e-mail)</b>	By telephone:  By e-mail:
<b>Preferred language of communication?</b>	<input type="checkbox"/> Uzbek <input type="checkbox"/> Russian <input type="checkbox"/> Other (please specify) .....
<b>Description of your feedback/comments</b> (What document in the ESIA Package are you referring to? What do you think has not been addressed sufficiently or appropriately in this document?):	
<b>What would you suggest to respond to this gap in the ESIA document?</b>	
<p><b>Please return this form to:</b>                      Project CLO                      _____                      _____</p> <p><i>Internal Use Only</i>                      Feedback received by: _____                      Date: _____</p>	

## **D. Mahallas Approached during the Draft ESIA Disclosure**

Table D.2 below summarises information on how many copies of the ESIA feedback forms were provided in each mahalla within the Project area.

**Table D.2: List of mahallas covered by the Draft ESIA disclosure process**

Region	District	Subdistrict	Mahalla	Comment boxes	Feedback forms distributed	Comment
Syrdarya	Oqoltyn	Toirov	Shodlik MFY	1	500	
		Sardoba	Sardoba MFY	1	300	Flood-affected
		Sardoba	Sakhovat MFY	1	500	Flood-affected
		Ukuboev	Kurmak Diyodor MFY	1	500	
		Bobur	Ahilik MFY	1	500	
		Musamukhammedov	Navoiy MFY	1	500	Flood-affected
	Sardoba	Sh. Rashidov	Birlik MFY	1	500	
		Sh.Rashidov	Ota Yurt MFY	1	500	
		Istiqlol	Sardoba Office	1	200	
<i>Sub-total Syrdarya region</i>				9	4000	
Kashkadarya	Kasbi	Nasafiy	Sohibkor MFY	1	250	
		Nasafiy	Katag'an MFY	1	250	
		T. Malik	Shakarjoy MFY	1	250	
		Talishbe	Talishbe MFY	1	250	
		Khujakulov	"Muskoki" MFY	1	200	
		Khujakulov	Hojaki MFY	1	200	
		Khujakulov	Nurobod MFY	1	200	
		Khujakulov	Kamashi MFY	1	200	
		Navruz	Nazartepa QFY	1	200	
		Komilon	Komilon MFY	1	250	
		A. Navoiy	Hodja Kasbi MFY	1	200	
Pakhtakor	Fazli MFY	1	200			

Region	District	Subdistrict	Mahalla	Comment boxes	Feedback forms distributed	Comment
		Pakhtakor	Jarkocha MFY	1	250	
		Pakhtakor	"Pakhtakor" MFY	1	200	
		Sh. Rashidov	Obod Yurt MFY	1	250	
		A. Navoiy	Qoratepa MFY	1	200	
		Sh. Rashidov	HojaHayran MFY	1	250	
		Kashkadarya	Pandiroq MFY	1	250	Quarantine
		A. Navoiy	Mustakilobod	1	200	Quarantine
		Komilon	Mesit	1	250	
		Nasafiy	Istiklol	1	250	
		Nasafiy	Okjanganl	1	250	Quarantine
		Nasafiy	Maymanok	1	200	
		T.Malik	Korakungirotd	1	250	Quarantine
		T.Malik	Kungirotd	1	250	Quarantine
		Sh. Rashidov	Jizza	1	250	
		A. Navoiy	Muglon	1	200	
		Beruniy	Chulkuvord	1	200	Quarantine
		A. Navoiy	Dustiik	1	200	
		A. Navoiy	Tinchlik	1	200	
	Nishon	Uch mula	"Yangiabad" MFY	1	700	
		Oydin	"Kaptarli" MFY	1	500	
		Samarqand	Samarkand MFY	1	500	
		A.Qodiriy	A.Qodiriy MFY	1	400	
		Hamza	"Istixon"	1	420	
		Guliston	"Balkhiyak" MFY	1	500	

Region	District	Subdistrict	Mahalla	Comment boxes	Feedback forms distributed	Comment
		Turkmaniston	"Aydin" MFY	1	500	
		Nurli kelajak	Qirqquloch	1	700	
		Shirinobod	Shirinobod	1	700	
		Nishon centre		1	800	
<i>Sub-total Kashkadarya region</i>				<i>40</i>	<i>12470</i>	
<b>Total in two regions</b>				<b>49</b>	<b>16470</b>	

## E. TV Consultation Advertisements Programme

### Syrdarya region TV adverts programme

Date	Media/TV Channel	Number of adverts in a day
22.06.20"	Syrdarya TV	6 times a day at 07:15, 08:05, 19:30, 20:30, 21:00, 21:30
23.06.20	Syrdarya TV	6 times a day at 07:15, 08:05, 19:30, 20:30, 21:00, 21:30
24.06.20	Syrdarya TV	6 times a day at 07:15, 08:05, 19:30, 20:30, 21:00, 21:30
17.07.20	Syrdarya TV	6 times a day at 07:15, 08:05, 19:30, 20:30, 21:00, 21:30
18.07.20	Syrdarya TV	6 times a day at 07:15, 08:05, 19:30, 20:30, 21:00, 21:30
19.07.20	Syrdarya TV	6 times a day at 07:15, 08:05, 19:30, 20:30, 21:00, 21:30"

Source: FE "Indorama Agro LLC"

### Kashkadarya region TV adverts programme

Date	Media/TV Channel	Number of adverts in a day
01.07.20	Kashkadarya TV	6 times per day at 06:25, 08:05, 18:05, 19:25, 20:00, 20:30
02.07.20	Kashkadarya TV	6 times per day at 06:25, 08:05, 18:05, 19:25, 20:00, 20:30
03.07.20	Kashkadarya TV	6 times per day at 06:25, 08:05, 18:05, 19:25, 20:00, 20:30
20.07.20	Kashkadarya TV	6 times per day at 06:25, 08:05, 18:05, 19:25, 20:00, 20:30
21.07.20	Kashkadarya TV	6 times per day at 06:25, 08:05, 18:05, 19:25, 20:00, 20:30
22.07.20	Kashkadarya TV	6 times per day at 06:25, 08:05, 18:05, 19:25, 20:00, 20:30

Source: FE "Indorama Agro LLC"

## F. ESIA Comments on Raised Concerns

The table below categorizes key concerns raised by the ACs and provides the ESIA response and mitigation measures.

**Table F.3: ESIA responses to community concerns**

No	Comment category	ESIA response and mitigation measures
1.	Community disturbance and odour.	<p>Some chemical used by the Company can cause odour impact near the fields. These odour emissions are not harmful to health. During the fields treatment the Company applies the best available technology to prevent dispersion of chemicals from the threatened area. The Company prohibits access to the treated fields to prevent any impact on community health and safety.</p> <p>As construction works are associated with noise. Specific mitigation measures for this period include:</p> <ul style="list-style-type: none"> <li>› All noisy works to be conducted during the daytime;</li> <li>› Unnecessary revving of engines to be avoided, and equipment will be shut down when not in use;</li> <li>› Internal haul routes to be well maintained;</li> <li>› Plant and vehicles to be started up sequentially rather than all together;</li> <li>› Effective exhaust silencing systems or acoustic engine covers to be used as appropriate;</li> <li>› Machines to be operated in accordance with manufacturers' instructions;</li> <li>› Site equipment to be kept away from noise-sensitive areas;</li> <li>› Loading and unloading to be carried out away from such areas;</li> <li>› Regular and effective maintenance to keep plant and equipment working to manufacturers' specifications.</li> </ul>
2.	Unemployment in communities and lack of local jobs, including jobs for women and young adults	<p>In 2019 the Project required 2,720 new skilled jobs in the agricultural sector (direct farmers mainly) in Kasbi, Nishon, Sardoba and Oqoltyn districts, as well as ten administrative jobs in the city of Tashkent. About 98% of all staff originates from Uzbekistan. Women occupy 7% of all jobs, however their representation varies significant between the Project districts (4-9%) and the headquarters in Tashkent (27%). In 2020 the Project will offer additional 430 jobs upon commissioning of residential complexes in Gulistan and Karshi and two gin plants and cotton depots in Kasbi and Sardoba districts. By the end of 2020, the Company estimates it will directly employ about 3,150 people locally.</p> <p>In addition to these permanent jobs, 2,000 seasonal jobs (weeds chipping) will remain in the Company and will be made available for the directly affected communities during weeding, as well as approximately 2,500 unskilled seasonal jobs will be offered by the Company-contracted farms.</p> <p>In order to maximise the employment benefits to the directly and indirectly affected local communities the Company will adopt the following measures:</p> <p>Development of a Project Recruitment Policy based on principals of non-discrimination and equal opportunities at recruitment for the Project jobs</p>



No	Comment category	ESIA response and mitigation measures
		<p>Inclusion in the Project Recruitment Policy a requirement to prioritise local employment ('local' will be specifically defined in the policy as people originating from directly affected ACs, and secondary priorities will be assigned to people from the wider Aol and Uzbekistan, in that order) for positions that become available</p> <p>Inclusion in the Project Recruitment Policy of specific targets for employment and engagement of women in all aspects of farming</p> <p>Wide disclosure of the Project Recruitment Policy</p> <p>Advertising permanent and seasonal jobs availability and recruitment processes including information about required skill levels, indicative timeframes for recruitment and likely duration of contracts to provide opportunities for the vulnerable groups in the ACs (such as the unemployed, unskilled or seasonal workers) to benefit from the Project. Notification of the local employment centres in the Project districts of the available jobs to prioritise recruitment of the people in the ACs.</p> <p>Prioritise employment of women and jobless from the ACs.</p>
3.	Low salaries and delays in paying salaries	<p>The Company started operation in 2019. By the end of 2019 the average monthly wage for operational staff in the Project districts varied between UZS950,000 (Nishon district) to UZS 2,250,000 (Sardoba district). The ESIA estimates and assesses potential impacts on incomes. However, more detailed monitoring of income or salary changes will be undertaken by the Company to better understand the impacts as they unfold and, where necessary, identify and implement mitigation measures.</p> <p>All Company staff are employed through labour contracts and salary payments are made in compliance with the labour contracts. The Company operations are monitored by labour authorities and any non-compliance with the labour law is subject to penalties and monitored by the government.</p> <p>In safeguarding labour and working conditions of the operational staff the Company is committed to be consistent with the RoU labour law and requirements of EBRD PR2 and IFC PS2 governing labour and working conditions. The following commitments are taken by the Company on workers' rights including but not limited to:</p> <ul style="list-style-type: none"><li>● Ensuring acceptable conditions of work including by observing national statutory requirements related to minimum wages and hours of work</li><li>● Meeting international standards related to paying all wages, including bonuses and premium pay for overtime work, to all employees in a timely fashion and in a manner consistent with ILO Convention 95</li><li>● Commitment to ensure that all workers continue to be paid during any periodic maintenance outage periods (for instance at gin plants)</li><li>● Not taking any action to prevent employees from exercising their right of association and their right to organise and bargain collectively</li><li>● Ensuring workers are not charged fees to gain employment on the Project</li><li>● Ensuring rigorous standards for occupational health and safety are in place</li><li>● Basing employment decisions on principles of non-discrimination and equal opportunity, in particular fair and equal pay, especially for women carrying out the same work as men.</li></ul> <p>A grievance mechanism has been established for the Project. Should you have any concern or labour grievance to be raised, please contact the Project CLOs (Chapter 1) for obtaining a grievance form and details on how to submit it. A grievance form is also provided in the Project SEP.</p>

No	Comment category	ESIA response and mitigation measures
4.	Lack of public utilities in communities (water, electricity and gas supply networks).	Indorama Agro is not responsible for the tap water, gas and electricity supply in communities; however, the Company makes efforts in providing support and investment in improving public infrastructure in the ACs. Over 2017-2019 the Company implemented a rehabilitation programme to upgrade or replaced the deteriorated irrigation infrastructure, including ground ditches, concrete canals, irrigation flumes (lotoks), water pipes, wells, pumps and water access points along the main canals. These efforts are helping to save irrigation water losses and reduce water consumption by the Project as well as to improve water supply to the local communities connected to the irrigation network.
5.	Availability of water.	<p>FE "Indorama Agro" LLC is reducing water losses and consumption through rehabilitation of the irrigation systems, replacing pipelines, using laser levelling and deep ploughing in the fields.</p> <p>The Project is using the existing irrigation and drainage infrastructure and has rehabilitated concrete canals, irrigation flumes, water pipes, wells, pumps and water access points along the main canals as well as collectors, open drainage ditches and underground pipes to reduce water losses and introduce water saving technologies.</p> <p>A stand-alone water study has been undertaken for the Project area to understand potential impacts of the Project on availability of water and other water users. Based on the findings of the Water Balance Model and its recommendations the Project will develop and implement a Water Resources Management Action Plan based to ensure efficient and sustainable use of agricultural water in the Project area. The Project will set up on-going monitoring and metering of water requirements for cotton plantations. The Project will continue to engage with Water Consumer Associations (WCA), government and other water users in the Project regions. In coordination with the Ministry of Water Resources and the existing WCA, the Project will establish a Water Stewardship Programme to ensure allocation of sufficient water resources to the Project without compromising access by other users in four Project's districts. This programme will be based on findings of the water balance model and the ongoing monitoring of water distribution for the agricultural operations. Moreover, Indorama Agro will submit meeting records and action items relevant to different Water Consumer Associations across four districts covering the Project areas and addressing two priority issues: (i) Reliability and volume of releases from government delivery channels, and (ii) Transmission losses between the main canals and the fields.</p>
6.	Use of hazardous chemicals (herbicides) and impact on the environment	<p>For operations in the fields the Company applies modern herbicides that are approved by the Government for application in Uzbekistan. These approved chemicals are being used by other local cotton farms and/or other clusters.</p> <p>Application of fertilizers and herbicides is controlled by automated operations of the modern machinery and equipment. Modern machinery minimizes herbicides application while ensuring the maximum effect for the crops and preventing contamination of soil.</p> <p>Contamination from excessive application of defoliant, pesticides and fertilizers is managed through the strict instructions for preparation of solutions of fertilizers, pesticides and other agrochemicals, and accurate identification of dosing rates for individual crops. All excessive pesticides solutions are collected and sold/donated to other farmers or transferred to the municipal wastewater treatment plant or to a licensed contractor for neutralization.</p> <p>Moreover, to avoid soil contamination, Indorama Agro ensures that (i) hazardous materials are suitably stored to prevent leaks and spills with adequate bunding provided for all fuel and chemicals storage; (ii) fertilizers and pesticides solutions are prepared in application machinery tanks or at a dedicated site with impermeable paving and a drainage system.</p>

No	Comment category	ESIA response and mitigation measures
		<p>The Company will also develop an Emergency Action Plan to respond to accidental discharge of petroleum products, pesticides and other agrochemicals into soil, drainage collectors and irrigation canals so that the prompt response measures are in place to minimize contamination of soil in case of any accident.</p> <p>To manage environmental, health and safety aspects of the Project and prevent accidents, injuries and occupational diseases a comprehensive Environmental, Health and Safety (EHS) Plan will be developed and implemented by the Company. The EHS Plan will identify and prioritize key physical, chemical and biological hazards, prevention and mitigation measures as well as monitoring and control actions.</p>
7.	Impact on community health and safety (application and use of pesticides and agrochemicals).	<p>The Company will develop and implement a Community Health and Safety Action Plan. The Plan will cover and address community H&amp;S risks associated with the application of fertilisers, pesticides and agrochemicals. The Company has established a corporate procedure for notification of all households in the vicinity to the fields of all operations with herbicides and agrochemicals and prohibits community access to the fields during and after completion of herbicides/agrochemicals spraying operations.</p> <p>No cases of herbicide poisoning are known to the Company or have been reported in the Project area. Please contact the Project CLOs (contact details are provided in Chapter 1) or any of Indorama Agro's offices as detailed in Table 2.1 to investigate any issues associated with herbicides application.</p>
8.	Improvement of occupational health and safety.	<p>The Company is committed to set up and implement an efficient management system in safeguarding OHS risk during operation. Specific measures are recommended by the ESIA study and will include as follows:</p> <ul style="list-style-type: none"> <li>● Introduce and implement the OHSAS 18001 management system</li> <li>● Develop and implement on the corporate level an OHS Policy and Procedures (as part of OHSAS management system)</li> <li>● Allocate respective OHS staff to implement OHS management system and manage OHS risks during operation</li> <li>● Updated the Company's organisation structure (including branch offices) to include staff to manage OHS issues during operation</li> <li>● Employ or assign a suitably qualified EHS Managers (at least two) to monitor construction projects in two Project regions</li> <li>● Develop the OHS training programme and provide necessary OHS briefings</li> <li>● Provide training to security staff to be employed in human rights and use of forces</li> <li>● Maintain PPE Register and monitor PPE use by the Company's staff</li> <li>● Encourage staff to report incidents and accidents and include toolbox talks on how to report them</li> </ul>
9.	Poor public infrastructure (community roads, schools, healthcare facilities)	<p>The Company is committed to share the Project benefits with the ACs. This commitment underpins the Corporate Social Responsibility (CSR) Strategy of the Company.</p> <p>Jointly with the RoU Ministry of Pre-school Education FE "Indorama Agro" LLC has identified that rehabilitation of the nurseries in Sardoba and Oqoltyn Districts need to be included as a matter of priority in the Indorama's Community Engagement Programme (CEP). The Company has undertaken consultation with the Ministry of Pre-school Education on the scope of this programme and identified two nurseries in Sh. Rashidov and T. Malik Sub-districts in Sardoba district piloted in 2019.</p> <p>As a part of the CSR Programme the Company is planning to build a modern school in Kasbi district and rehabilitate local nurseries so that the Project has potential to share benefits with the ACs.</p> <p>Also, construction of the Project facilities (gin plants and cotton depots) includes construction and/or rehabilitation of all access roads.</p>

No	Comment category	ESIA response and mitigation measures
10.	Impact on livelihoods (reduced supplies in fodder/straw and dry cotton plants used as fuel by local communities).	<p>To offer employment with the Company to farmers after land acquisition for the Project was a key mitigation measure to the land acquisition impacts on local farmers. Each household had the option to have at least one family member work on the Project. Recognising that many of these directly affected households did not take the job option, a Livelihood Restoration Plan (LRP) has been developed and will be implemented by the Company. The LRP is available in hard copies and electronically via the Company CLOs (refer to Chapter 1 for the CLOs' contact details).</p> <p>The LRP presents a multi-pronged approach in addition to the creation of permanent and seasonal jobs through livelihood restoration activities related to the agriculture sector.</p> <p>The Company is currently creating community assets aligned with community interests and develop income generating activities in order to mitigate income losses associated with the project. A Community Engagement Programme (CEP) has been designed with the support of IFC Agri Advisory. The Community Asset Programme (CAP) is the first initiative under the CEP. The Company has identified mulberry tree plantations to be the key element of the CAP because there is existing local capacity, culture and tradition around silk farming.</p> <p>The CAP commenced in 2019 and is currently designed to continue until 2026. Some of the mulberry trees have now been planted and the first harvest is expected three years from first planting, in 2021. The mulberry plantation will include 13,888 trees per one hectare with the leaf harvest expected to produce 97,000 kg per ha. The CAP's mulberry plantations will cover an area of 450 ha in total and is expected to engage the two Project regions and four affected districts, including 30 villages, 21,874 households and over 80,000 people by 2024.</p> <p>The Company will provide agronomist support and take care of the mulberry plantations during the first three years after planting to make sure that trees are growing successfully and that leaves are of good quality. Currently approximately 910 households in the four subdistricts are engaged in silk farming with support from the Project. Going forward, monitoring be used to determine the relationship between the households involved in mulberry plantation and silk farming activities and the provision of land for direct farming, for instance whether the households are former farm managers or farm workers.</p> <p>If you are interested in the CAP or would like to understand more details about it please contact the Project CLOs via contact details as provided in Chapter 1.</p>

## G. Updated Project Stakeholders Matrix

**Table G.4: Project stakeholders and consultation methods**

Stakeholders Identified	Status			Engagement Methods																
	Affected	Interested	Decision-makers/regulators	Face-to-face meeting	Formal communications	ESIA Disclosure Package	Public Exhibition Event	Disclosure of the Project leaflet	Employment advertisements	Disclosure of the Project HR Policy	Engagement with PU Managers	Engagement with the Project CLO	Engagement with EHS Officer(s)	Engagement with HR Manager	Community grievance mechanism	Workers' grievance mechanism	Monitoring missions	Progress and monitoring reports	Project web-site	
<b>(I) Project affected communities, vulnerable and marginalised groups</b>																				X
● Residents of Kasbi and Nishon districts in Kashkadarya and Oqoltyn and Sardoba District in Syrdarya regions, including vulnerable and disadvantaged groups:	X					X	X	X		X		X			X					X
– disabled	X					X	X	X				X			X					X
– elderly	X					X	X	X				X			X					
– the poor	X						X	X	X			X			X					X
– unemployed	X					X	X	X	X	X		X			X					X
– women and female-headed households	X					X	X	X	X			X			X					X
– children under 16 years old	X						X	X				X			X					X
– young adults	X					X	X	X	X	X										
<b>(II) Employees, job seekers and non-employee workers and their representatives</b>																				
● Contracted farmers (394)	X					X	X			X	X	X	X	X		X				X
● Employees of FE "Indorama Agro" LLC	X					X	X			X				X		X				
● Construction workers (tbc)	X									X			X	X		X		X		

● Trade Unions and employee representatives	X	X	X	X	X	X	X	X	X	X	X
<b>(III) International Lenders</b>											
● EBRD		X	X	X	X	X		X		X	X
● IFC and associated consultants		X	X	X	X	X		X		X	X
<b>(IV) International Organisations</b>											
● International Labour Organization	X				X					X	X
● International Cotton Advisory Committee	X			X	X				X	X	X
● Better Cotton Initiative	X			X	X			X		X	X
<b>(V) National, Regional and Local Governments and Authorities</b>											
● Ministry of Agriculture		X	X	X	X	X		X	X		
● Ministry of Employment and Labour relations		X	X	X	X	X		X	X		
● Oblast Hokimiats (2)		X	X	X	X	X		X			X
● District Hokimiats (4)		X	X	X	X	X		X			X
● Coordination councils of citizens self-governance (mahallas)	X		X	X	X	X	X	X			X
● Local environmental authorities	X		X	X	X	X		X	X		X
● Local labour and employment authorities	X		X	X	X	X		X			X
<b>(VI) Sector organisations</b>											
● «Uztextileprom» Association	X			X	X			X			X
● «Uzpakhtasanoat» JSC	X			X	X						X
<b>(VII) Civil society organisations and non-governmental organisations</b>											
● Farmers Association	X			X	X	X		X		X	X
● Uzbek-German Forum for Human Rights											
● Anti-Slavery International											
● International Labor Rights Forum											
● Bankwatch											
● Uzbekistan's Women Committee											
● Others (to be identified through SEP disclosure)											
<b>(VIII) Human rights activists</b>											
● Shuhrat Ganiev	X			X	X	X		X		X	X

● Elena Urlaeva												
<b>(IX) Suppliers, Contractors and Private Businesses</b>												
● Local supplier	x		x	x		x	x	x	x		x	x
● Local contractors	x		x	x		x	x	x	x	x	x	x
● Other businesses (to be identified through SEP disclosure)	x			x								x
<b>(X) Other stakeholders</b>												
● Local public newspapers, local radio, local TV channels	x		x	x	x			x				x



