



# **Uzbekistan: Cotton Farming Project ESIA**

Stakeholder Engagement Plan

December, 2020



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# Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	02.09.2019	E. Mokrinskaya	A. Strokina	M. Melinte	Draft SEP
B	06.09.2019	E. Mokrinskaya	A. Strokina	M. Melinte	Final SEP
C	20.09.2019	E. Mokrinskaya	A. Strokina	M. Melinte	Final SEP. Second revision
D	02.09.2020	E. Mokrinskaya	A. Strokina	M. Melinte	Final SEP. Third revision
E	28.09.2020	E. Mokrinskaya	A. Strokina	M. Melinte	Final SEP. Forth revision
F	28.09.2020	A. Strokina	H. Mills	M. Melinte	Final SEP. fifth revision
G	13.11.2020	A. Strokina	H. Mills	M. Melinte	Final SEP. sixth revision
H	16.12.2020	A. Strokina	H. Mills	M. Melinte	Final SEP for disclosure

**Document reference:** C42484 | 02 | H

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# Contents

<b>Executive summary</b>	<b>1</b>
<b>1 Introduction and Project Summary</b>	<b>2</b>
1.1 Overview	2
1.2 Project Background and Description	2
1.3 Project Area of Influence	5
<b>2 Stakeholder Engagement Requirements</b>	<b>7</b>
2.1 Overview	7
2.2 National Requirements	7
2.3 Applicable International Requirements	8
2.3.1 EBRD Requirements	8
2.3.2 IFC Requirements	9
<b>3 Stakeholder Engagement Status</b>	<b>11</b>
3.1 Who are Project Stakeholders?	11
3.2 Indorama's Communications and Public Disclosure	11
3.2.1 Internal	11
3.2.2 External	11
3.3 Previous Stakeholders' Engagement	12
<b>4 Identification of Stakeholders and Communication Methods</b>	<b>13</b>
4.1 Stakeholder Engagement and Disclosure for the ESIA Process	13
4.1.1 Scoping Phase Consultation and Disclosure	13
4.1.2 Assessment Phase Consultation	13
4.1.3 ESIA Disclosure Consultation	14
4.2 Stakeholders Analysis	17
<b>5 Stakeholder Engagement Programme</b>	<b>22</b>
5.1 Overview	22
5.2 Gender considerations	22
5.3 Inclusion and Continuity	22
5.3.1 Web-resources	23
5.4 Community Liaison Officer	23
5.5 Specific approach during COVID-19 Restrictions	23
5.5.1 Attention to vulnerable groups	23
5.6 Engagement Programme	24

<b>6</b>	<b>Public Grievance Mechanism</b>	<b>32</b>
6.1	Overview	32
6.2	Confidentiality and Anonymity	32
6.3	Grievance Reporting and Resolution	32
<b>7</b>	<b>Monitoring and Reporting</b>	<b>35</b>
7.1	SEP Reporting	35
7.2	CLO Reporting	35
7.3	Annual Reporting	35
7.4	Project Environmental and Social Management Plan	35
7.5	Performance Evaluation	35
	<b>Appendices</b>	<b>36</b>
<b>A.</b>	<b>Grievance Form</b>	<b>37</b>
<b>B.</b>	<b>Alternate i-SEP for the ESIA Disclosure Phase</b>	<b>38</b>
	<b>Tables</b>	
	Table 1.1: Summary of direct farming land acquired for the Project	3
	Table 1.2: Contract farming in Kasbi district	3
	Table 1.3: Expansion of the contract farming footprint, five years outlook	4
	Table 1.4: Affected communities (ACs) in Kashkadarya and Syrdarya regions	5
	Table 4.1: Focus group discussions	14
	Table 4.2: Meetings with Project stakeholders	14
	Table 4.3: Positive and negative opinion of the Project	15
	Table 4.4: Project Stakeholders and Engagement Methods	19
	Table 5.1: Stakeholder engagement timescales and responsibilities	25
	Table 6.1: Grievance classification criteria	33
	Table 6.2: Project Community Liaison Officers	33
	<b>Figures</b>	
	Figure 4.1: Positive feedback of the Project from the ACs	15
	Figure 6.1: Flowchart for Processing Grievances	34
	<b>Maps</b>	
	Map 1.1: Project location	3

## Tables - Appendices

Table B.1: ESIA Phase Engagement – Draft ESIA Report Disclosure

39



# Executive summary

Abbreviation	Description
ACs	Affected communities
CLO	Community Liaison Officer
Company	FE "Indorama Agro" LLC
Consultant	Mott MacDonald Limited and Ecostandart Expert
CSOs	Civil society organisations
GIP	Good international practice
Goskomekologiya	State Committee on Ecology and Environment Protection of the Republic of Uzbekistan
GoU	Government of Uzbekistan
IFC	International Financial Corporation
i-SEP	Interim Stakeholder Engagement Plan
EBRD or Bank	European Bank for Reconstruction or Development
EHS	Environment, health and safety
EIA	Environmental impact assessment
EPE	European Principles for the Environment
ESAP	Environmental and social action plan
ESIA	Environmental and social impact assessment
ESMP	Environmental and social management plan
ESP	Environmental and Social Policy of the EBRD
EU	European Union
International Lenders	EBRD and IFC
NGOs	Non-governmental organisations
NTS	Non-Technical Summary
PER	Public environmental review
Project	Cotton Farming Project in Uzbekistan
PRs	Performance Requirements
PSs	IFC Performance Standards on Environmental and Social Sustainability
RoU	Republic of Uzbekistan
SCR	Summary Consultation Report
SEE	State Environmental Expertise
SEP	Stakeholder Engagement Plan
SIA	Social impact assessment
Sponsor	Indorama Corporation Ltd.
UGF	Uzbek German Forum
WB	World Bank

# 1 Introduction and Project Summary

## 1.1 Overview

This document is the Stakeholder Engagement Plan (**SEP**) prepared as part of the Environmental and Social Impact Assessment (**ESIA**) of the Cotton Farming Project in Uzbekistan (the **Project**).

The purpose of this SEP is to manage stakeholder engagement activities for the lifetime of the Project. It has been prepared in line with the national law and international requirements.

SEP is structured in seven chapters. After the introduction, the second chapter includes a brief description of the stakeholder engagement requirements. Chapter 3 is dedicated to the findings with respect to stakeholders' engagement. The fourth chapter includes a brief description of the stakeholder's analysis methodology and a draft table with the generic stakeholders identified during the ESIA scoping phase. Chapters 5 and 6 represent the main part of this document and Chapter 5 includes the stakeholders' engagement programme and methods of engagement while Chapter 6 illustrates the grievance mechanisms. The last chapter presents the monitoring and evaluation procedures for SEP.

SEP will be reviewed periodically during Project implementation and updated as necessary prior to the Project major phases, any new or changed operations, modifications in the Project design or if new stakeholders are identified.

## 1.2 Project Background and Description

### National Strategy and Cotton Farming Schemes

The Government of Uzbekistan (**GoU**) has set up a priority to further develop the textile industry and formulated a national strategy towards transforming and upgrading the cotton industry via extensive involvement of the private sector in cotton farming to reduce the role of the State in the agricultural production, stimulate direct investment, introduce effective methods of cotton farming, promote deep processing technologies and increase productivity and wages in the agricultural sector.

In 2017 Uzbekistan declared its intention to abandon the export of cotton fibre to fully process it within the country and export finished products only. In 2018, cotton farming clusters were established in 20 districts at the area of 164k ha. The plan for 2019 is to farm cotton in 61 clusters out of total 66 clusters with a total land of 660,000 ha targeted by the end of 2020 when a transition will be made to the complete processing of cotton fibre.

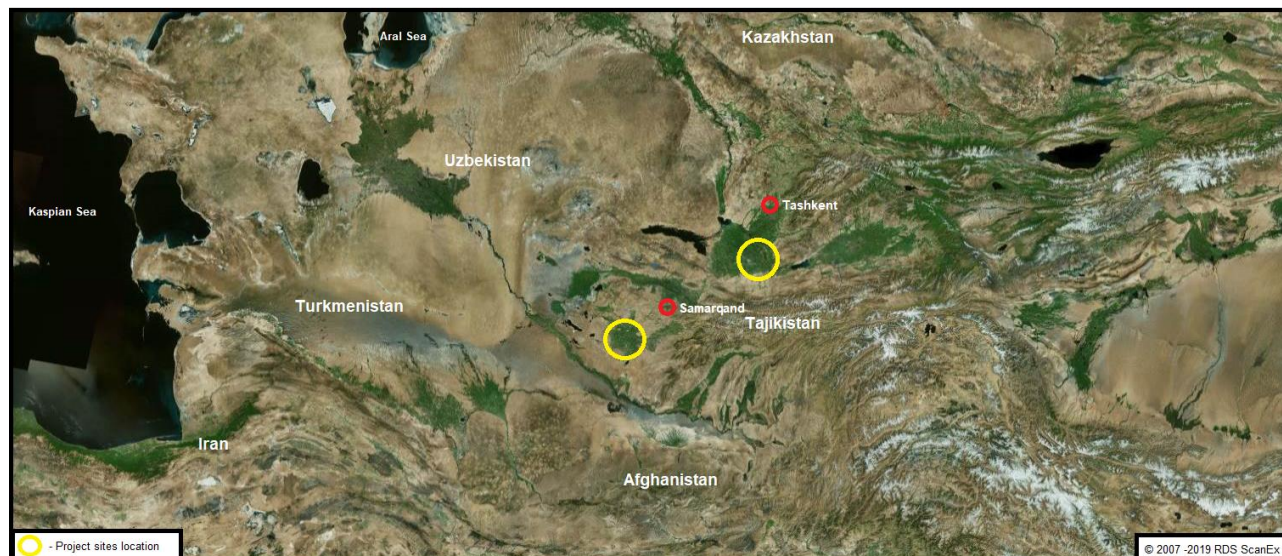
### Project Company

To respond to the GoU initiative, Indorama Corporation Pte. Ltd. (the Sponsor) decided to start growing cotton primarily for its own consumption at the existing spinning facility in Kokand (operated by JSC Indorama Kokand Textile, Uzbekistan an indirect subsidiary of the Sponsor). 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 Location

The Project is located in Kashkadarya and Syrdarya regions of the Republic of Uzbekistan (**RoU**) – two regions with developed agricultural sector and extensively irrigated cropping areas. Map 1.1: Project location below demonstrates the location of the Project areas. The Project will be located within the existing land plots previously used by local farmers for planting of primarily cotton and wheat under contract with entities of the RoU, and minor crops like melons and watermelons in a relatively very small area.

**Map 1.1: Project location**



Source: <http://kosmosnimki.ru/?permalink=4ZIRD>

### Project Definition and Components

The Project will establish production of cotton, wheat and mung bean or any other suitable rotation crop to rotate with cotton

The GoU has allocated cotton land to the Company under a lease agreement for 49 years within Kasbi and Nishon districts of Kashkadarya region and Sardoba and Oqoltyn districts of Syrdarya region for direct cotton farming. The land allocation process followed specific selection criteria to ensure that land acquisition proceeded on a voluntary basis. The Project established 22 cotton farming sub-districts to facilitate and manage farming operations across a total area of 54,196 ha as detailed in Table 1.1.

**Table 1.1: Summary of direct farming land acquired for the Project**

Region	District	Sub-districts	Allocated land, ha
Kashkadarya	Kasbi	4	13,088
	Nishon	9	14,549
Syrdarya	Oqoltyn	5	12,770
	Sardoba	4	13,789
<b>Total:</b>		<b>22</b>	<b>54,196</b>

Source: FE Indorama Agro LLC

Along with the Company's direct cotton farming, a contract farming programme has been launched in Kasbi district in 2019 and will be implemented for local farmers eventually in all four cotton districts. The contract farming scheme now involves ten sub-districts covering the total area of 12,536 ha as summarised in Table 1.2 below.

**Table 1.2: Contract farming in Kasbi district**

No.	Sub-Districts	Contracted Farms	Producer Units (PUs)	Cotton Area, ha
1.	Kashkadaryo	58	PU-1	2,053
2.	Pakhtakor	24	(82 farmers / 2,662 ha)	609

3.	Galaba	52	PU-2 (118 farmers / 3,893 ha)	1,829
4.	T. Malik	35		1,004
5.	M. Ulugbek	18		672
6.	Talishbe	13		388
7.	Maymanoq	40	PU-3 (84 farmers / 2,574 ha)	1,373
8.	Komilon	44		1,201
9.	A Navoi	58	PU-4 (110 farmers / 3,408 ha)	1,435
10.	Sh. Rashidov	44		1,973
<b>TOTAL</b>		<b>394</b>	<b>4 Producer Units</b>	<b>12,536</b>

Source: FE Indorama Agro LLC

The contract farming area in Kasbi is divided into four Producer Units, each responsible for two to four cotton farming sub-districts managed by PU Manager who reports directly to the Sub-district Manager. PU Managers are supported by local agronomist and manage and monitor local farmers on a regular basis. The existing contract farming management approach will apply to all contracted farms across the Project area.

Contracted farmers are receiving financial support (pre-financing, seeds, fertilizers, defoliant and chemicals), continuous agronomic support and training, and in return will deliver cotton to Indorama at a price no less than the price set by the governmental gins.

To date Indorama Agro's contract farming involves 394 farms. The Project plans to introduce contract farming across the Project area and reach 1,000 farmers, covering a total area of 27,000 ha by 2023 (Table 1.3).

**Table 1.3: Expansion of the contract farming footprint, five years outlook**

Period	Contracted Farms	Cotton Area, ha
2019	394	12,536
2020	700	20,000
2021	900	25,000
2022	1000	27,000
2023	1000	27,000

Source: FE Indorama Agro LLC

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 delinting and cotton seed chemical treatment facilities
- Rehabilitation and construction of cotton and grain storages, storage for crop inputs, mechanical workshop, 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 desalinization.

### International Financing of the Project

The European Bank for Reconstruction and Development (**EBRD**) and International Financial Corporation (**IFC**) (jointly referred to as **International Lenders**) are considering co-financing the Project's investments in agricultural machinery, buildings, ginning facilities, land redevelopment and irrigation.

## Associated Projects

Three associated projects have been identified for the Project:

- Construction of the residential complex in Karshi to accommodate staff and families working in Kashkadarya branch of Indorama Agro
- Construction of the residential complex in Gulistan to accommodate staff and families working in Syrdarya branch of Indorama Agro
- Linking of utilities like electricity, gas, water, sewerage as required from main supply lines to the battery limit of all the facilities of the Project.

### 1.3 Project Area of Influence

The Project footprint will affect the following communities in Kasbi, Nishon, Sardoba and Oqoltyn districts.

**Table 1.4: Affected communities (ACs) in Kashkadarya and Syrdarya regions**

Kashkadarya Region		Syrdarya Region		
Kasbi District	Nishon District	Sardoba District	Oqoltyn District	
Aqzantal	Komilon	Azad	Birlik	Ahillik
Baydakchy	Maymanoq-1	A. Qodiriy	Dustlik	Barlas
Beruniy	Maymanoq-2	Balkhiyak	Gulzar	Bustan
Chavkay	Mesit	Charagan	Gulistan	Fergana
Chilimbash	Muglan	Dustlik	Imeni Volkova	Galaba
Chimkurgan	Mustakylabad	Gulistan	Navbakhor	Kurkam Diyor
Denav	Navkat	Istiqboi	Navoi	Nayman
Dorman	Nazartepa	Kaptarly	Ota Yurt	Sardoba
Duraza	Nurobod	Katta Amkhor	Pakhtaabad	Shadlik
Esabay	Pakhtakor	Kuksoy	Pakhtaabad township	Shodlik
Fazli	Pandiran	Mekhatabhad	Qurg'ontepa	
Jarkucha	Sargudzhum	Navruz	Uchtam	
Kadyrabad	Shakardzuy	Oydin	Yordosh	
Kamashi	Talishbe	Pakhtazar		
Karakhodzha	Talliulgun	Qirqquloch		
Karakungyrat	Tashkuduk	Shirinobod		
Karatepa	Tashkurgan	Yangiabad		
Karshi	Tersaul	Yangi Nishon		
Kasbi	Ukatar			
Kazak	Unikki			
Kerait	Uyrat			
Khitai	Uqsalish			
KhodzhaKhairan	Zarkurgan			

Khodzharluk	Zhat
Khudiyon	Zhizza
Khujaki	Zumrad

Source: Analysis by Mott MacDonald

Other neighbouring settlements beyond the administrative boundaries of these four districts that may potentially be affected by the Project include: Mirichkar, Akmachit, Yangi-Mirishkor, Komsomolabad, Elabad, Yangikhayat, Tura-Kul, Shirkent, Chodshar, Pandyrn, Naymankishlak, Kakhraman, Navbakhor.

## 2 Stakeholder Engagement Requirements

### 2.1 Overview

This SEP has been undertaken to meet national legislative requirements of Uzbekistan. Financing for the Project will be sought from International Lenders and it means that the Project will have to adhere to the EBRD Environmental and Social Policy (**EBRD ESP**) and incorporated Performance Requirements (**PRs**), IFC Performance Standards on Environmental and Social Sustainability (**IFC PSs**) and European Union (**EU**) directives and good international practice (**GIP**) related to information disclosure and stakeholder engagement. These requirements are explained in this chapter.

### 2.2 National Requirements

All developments under the Project as well as the associated project are subject to national Environmental Impact Assessment (**EIA**). Stakeholder engagement and disclosure of planning and environmental information is regulated as part of the EIA process.

The EIA process in Uzbekistan is governed by the following main legislation:

- RoU Law No.754-XII dated December 9, 1992 "On Environmental Protection"
- RoU Law No.73-II3 dated May 25, 2000 "On Environmental Expertise" (Law on Environmental Expertise)
- Decree of the Cabinet of Ministers of the Republic of Uzbekistan dated 22 November 2018 No.949 "On Approval of the "Regulation on State Environmental Expertise in the Republic of Uzbekistan" (**SEE Decree**)
- Decree of the RoU Cabinet of Ministers No.KM14 dated January 21, 2014 "On Approval of "the Regulation on Manual for Development and Approval of Environmental Impacts".

The EIA procedure is subject to State Environmental Expertise. SEE is the process of establishing environmental compliance of a project and determining adequacy of environmental impact assessment conducted by the State Unitary Enterprise "Centre of State Environmental Expertise" or the regional bodies of the SEE of the State Committee on Ecology and Environmental Protection (the "**Goskomekologiya**") at both the national and regional levels, depending on the project category. The SEE Decree stipulates four categories of development within the SEE context, ranging from Category 1 (High Risk) to Category 4 (Local Impact). As defined in Annex 2 of the SEE Decree, the Project components are:

- (19) Channels with a capacity of less than 50 m<sup>3</sup>/s – classified as Category 3 (low risk)
- (31) Ginning facilities – classified as Category 2 (medium risk)
- (43) Reclamation and improvement of irrigated land with the area of over 1,000 ha – falls into Category 3 (low risk)
- (9) Grain storage facilities are classified as Category 4 project. Processing and preservation of agricultural products (local impact).

Pursuant to the SEE Decree, the national EIA is a staged process and involves four major phases: (i) Draft Statement on Environmental Impact (at the planning phase prior to financing), (ii) Statement on Environmental Impact (if additional surveys are recommended by the SEE), (iii) Statement on Environmental Consequences (during the commissioning phase) and (iv) Emission, Discharge and Waste Generation Permit (for the operation phase). Category 4 projects will need to complete Draft Statement on Environmental Impacts only.

The national requirement specifies two non-mandatory mechanisms for consultation during the EIA process: the public environmental review (**PER**) and public hearings. PER might be undertaken by an independent expert panel and the opinion granted by PER will not have mandatory implications.

There is no official regulatory guidance as to which type of project requires a public hearing or how public hearings should be conducted. The EIA Procedure Manual provides some guidance. It recommends that public hearings are held when the draft EIA is ready and suggests few patterns of how to organise such events and potential attendees.

The Law on Environmental Expertise (2017) states, that a project promoter could announce locally that the EIA procedure is underway. In this case, after completion of the EIA process, the results of conclusions or EIA findings should be made public within one-month period. However, there is no specific legislation that guides the disclosure procedure. The SEE Decree specifies that results of public hearings and disclosure should be included in the EIA documentation to be submitted for SEE review. The Statement on Environmental Consequences shall detail *inter alia* all comments received through the public hearings, if undertaken.

Since the existing approach to public consultation in Uzbekistan does not involve extensive engagement of the general public and is sometimes limited to consultation with local authorities, rather than the general public, the approach to planning engagement and disclosure for the Project has been guided by GIP embodied in the applicable international requirements as summarised below.

### 2.3 Applicable International Requirements

According to EBRD and IFC categorisation definition the Project is considered as Category A project.

A project is categorised A when its implementation may result in potentially significant adverse future environmental and/or social impacts, and therefore the project will require a comprehensive environmental and social impact assessment to international standard including stakeholder engagement and disclosure of ESIA findings to general public and key project stakeholders.

The Project categorisation is driven by the large geographical footprint of the proposed farming scheme, vulnerability of water resources in the Project area and other environmental risk of the cotton farming as well as potentially significant economic displacement and the Project sector and country previously associated with the child and forced labour that may potentially result in significant adverse E&S impacts.

In line with consultation and disclosure requirements of the International Lenders applied to category A projects a Project SEP needs to be developed and shall include the Project grievance mechanism.

#### 2.3.1 EBRD Requirements

EBRD is committed to promoting environmentally sound and sustainable development in line with:

- EBRD ESP (2014) and *PR10: Information Disclosure and Stakeholder Engagement*
- Public Information Policy (2014)

The EBRD's ESP defines stakeholder engagement as an on-going process which involves the following elements: (i) stakeholder identification and analysis; (ii) stakeholder engagement planning; (iii) disclosure of information; (iv) meaningful consultation and participation; (v) an effective grievance procedure or mechanism, and (vi) ongoing reporting to relevant stakeholders. The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the project life.

For this Project EBRD requires that the Company will:

- Built disclosure and consultation requirements into each stage of the ESIA process
- Identify and document the various individuals or groups who are or will be directly or indirectly affected by the Project or may have an interest in it
- Define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for stakeholder engagement activities including implementation and monitoring



- Engage in a scoping process with interested parties and make sure that stakeholders are able to provide comments and recommendations on the draft SEP and other scoping documents.
- Develop and implement a Stakeholder Engagement Plan
- Disclose the Environmental and Social Action Plan (**ESAP**) and other documents to be prepared by the ESIA study to the affected parties in accordance with the SEP
- Keep the ESIA in the public domain throughout the life of the Project which may be amended from time to time, with additional information
- Provide annual reports to the Project stakeholders on E&S performance (as publication or via web-site) throughout the life of a project. These reports will be in a format accessible to the affected communities
- Disclose additional information at key stages in the project cycle (prior to construction start, start-up of operations, decommissioning)
- Inform the ACs if there are material changes to the Project which result in additional adverse impacts or issues of concern and report how these impacts and issues are being addressed including disclosure of the Environmental and Social Management Plan (**ESMP**) in accordance with the SEP
- Carry out additional disclosure and consultation if additional adverse impacts on the ACs are significant
- Respond to stakeholders' concerns related to the Project in a timely manner
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances

Special provisions shall be made to allow disadvantaged or vulnerable groups or individuals to be informed about the Project and give their views on the Project where appropriate.<sup>1</sup>

### 2.3.2 IFC Requirements

The IFC, established in 1956, is known as the private sector arm of the World Bank Group. Public consultation, disclosure and stakeholder engagement are key requirements of the IFC's Policy on Environmental and Social Sustainability embodied within the Performance Standards.

The eight IFC PSs are applicable to private sector projects in emerging markets. Each PS has specific consultation requirements, and these are embedded in the general requirements specified in PS 1: Assessment and Management of Environmental and Social Risks and Impacts. These requirements specifically refer to the need for and means of achieving community engagement, disclosure of relevant project information, appropriate consultation processes, grievance mechanisms throughout the project lifecycle and on-going reporting to ACs. The requirements for stakeholder engagement in projects are:

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

IFC PSs seek to provide accurate and timely information regarding Project investment and advisory activities. IFC's Access to Information Policy states that for Category A projects proposed for financing, a summary of review findings and recommendations must be disclosed and include as a minimum the following information:

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<sup>1</sup> As defined in the EBRD's ESP vulnerable groups refer to people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. Vulnerable individuals and/or groups may also include, but not be limited to, people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and /or international law.

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

## 3 Stakeholder Engagement Status

### 3.1 Who are Project Stakeholders?

Stakeholders are persons or groups who are directly or indirectly affected by the Project, as well as those who may have interests in the Project and/or the ability to influence its outcome, either positively or negatively. Stakeholders for the Project may include locally affected communities and their formal and informal representatives, national or local government authorities, civil society organisations and groups with special interests, the academic community, or businesses.

### 3.2 Indorama's Communications and Public Disclosure

In order to improve performance and public image, a company has to continuously pay attention to all stakeholders relevant to its activities. Indorama Agro is aware about this and is making efforts to keep the communication channels open with local, regional, national and international stakeholders. The Company uses internal and external channels to communicate with relevant stakeholders, although neither are elaborate. Most communication is one-way (from the Company towards stakeholders) with only a few options for internal and external stakeholders to provide feedback to the Company.

#### 3.2.1 Internal

**The Company communicates with employees through:**

- Letters, internal notes, notice-board announcements at visible locations in offices and on sites
- E-mail
- Telegram channel with PU managers and HR that provide support in all issues related to business activities and EHS
- Verbally during everyday business communication
- An 'open door' policy with PU managers and HR offering support in daily operations and EHS aspects
- Notifying employees of objectives and programmes via staff responsible for the related objective/programme

Being a newly established company, Indorama Agro has not yet formalised a mechanism on how to process and respond to concerns and resolve workers' grievances. The established practice encourages employees to discuss their problems and concerns with the immediate line manager and/or respective PU manager, and in case of escalation with the HR Manager and even with the Indorama senior management, although the latter is very rare. Indorama Agro will formalise the existing informal process with clear guidance on whom to contact for different types of grievances and what actions need to be taken when suggestions or grievances are submitted. Indorama Agro is negotiating with the trade unions to have representation in the Company and may use the future Trade Union Committee as an instrument for workers grievance resolution.

#### 3.2.2 External

**The Company communicates with external stakeholders through:**

- Direct communication with the stakeholders (by telephone, face-to-face meetings, e-mail, etc.)
- Official announcements to the public (incl. coverage in newspapers and on radio)
- Through answers to remarks, complaints and inquires received in writing or verbally from external stakeholders

### 3.3 Previous Stakeholders' Engagement

The Project is managed in line with the 2020-2024 National Strategy for Developing Textile, Garment and Knitwear Goods Industry in Uzbekistan and under the respective governmental monitoring and support.

Indorama Agro has a very good partnership with the local Hokimiyats with established regular communication. Hokimiyats provide the Company with regular feedback from local communities and contracted farmers in Project and jointly discuss challenges and find mutually beneficial solutions.

During the land allocation process, managed by District Hokimiyats, the Company collaborated with the local governments and the Farmers' Association who was consulted and involved in the land acquisition process as a representative of the farmers. The farmers general meeting was gathered in each district to discuss the decision of the Government and ensure that land acquisition by the Project is proceeded on a voluntary basis. After general meeting individual consultations with the farmers were initiated (involving two-three rounds for each farmer). All farmers who agreed to terminate their respective LLAs were proposed to join Indorama Agro and work full time on the basis of long-term labour contracts.

Indorama Agro is also in a continuous transparent dialogue with industry stakeholders such as Uztextileprom and private textile producers, local and international non-governmental organisations (**NGOs**), such as Better Cotton Initiative, International Cotton Advisory, civil society organisations (**CSOs**) and local human rights activists transferring best practices and implementing various training and coaching programmes for the contracted farmers. Contracted farmers are in day-to-day contact with PU managers and agronomists from Indorama and they communicate via WhatsApp application to receive advice and support.

The independent third-party monitoring is regularly undertaken by the International Labour Organization (**ILO**) and Uzbek German Forum (**UGF**) during the harvest season promoting decent work conditions for all women and men. This activity meets the Better Cotton Initiative's requirement of multi-stakeholder participation in the Project and develops a sustainable cotton supply chain in Uzbekistan.

## 4 Identification of Stakeholders and Communication Methods

### 4.1 Stakeholder Engagement and Disclosure for the ESIA Process

#### 4.1.1 Scoping Phase Consultation and Disclosure

As part of the ESIA scoping phase series of consultation events were undertaken in July 2019 with the following Project stakeholders:

- Kasbi District Hokimiyat
- Sardoba District Hokimiyat
- Kamashi mahalla including Commission on Women's Affairs of Kamashi mahalla
- Sardoba and Oqoltyn mahalla
- Environmental Expertise of the Kashkadarya Region
- Employment Support Department in Sardoba district
- Employment Support Department in Kasbi district
- Commission on Women's Affairs of Akaltyn District Hokimiyat
- International Finance Corporation Office in Tashkent

These meetings were used to disclose information about the Project, explain the forthcoming ESIA process, request data, identify associated projects and additional potential stakeholders and their interests, identify opportunities and listen to any concerns raised about the Project. The key concerns defined relate to: land acquisition procedure, child and forced labour, employment, community health, safety, security and wellbeing, vulnerable groups' involvement. The identified environmental concerns involved air and water quality, vulnerability of water resources in the Project area, noise and vibration, land contamination as a result of using pesticides in cotton farming, soil salination and transportation.

#### 4.1.2 Assessment Phase Consultation

While drafting the ESIA Report, the Project held another round of stakeholder engagement and consultation activities from 1-7 December 2019 to have focus group discussions (FGDs) and meetings with Indorama, local government in the affected districts, hokimiyats, farmers' representatives, Indorama workers (both direct and contract farmers) and local community members. The following consultations were undertaken:

- Eleven focus group discussions in four districts, involving:
  - Local communities
  - Women in communities
  - Former farmers, including farmers employed by Indorama
  - Contract farmers
- Short social surveys at each focus group
- Four District Hokimiyats were consulted
- Two Farmers' Associations were consulted

Table 4.1 below provides a list of FGD meetings undertaken.

**Table 4.1: Focus group discussions**

No.	Date	Region	District	Attendees	Type of attendees
1	2 December 19	Syrdarya	Oqoltyn	7	Women from local communities
2	2 December 19	Syrdarya	Oqoltyn	9	Men from local communities
3	2 December 19	Syrdarya	Oqoltyn	13	Direct farmers (13 men)
4	3 December 19	Syrdarya	Sardoba	10	Women from local communities
5	3 December 19	Syrdarya	Sardoba	11	Direct farmers (3 women and 8 men)
6	4 December 19	Kashkadarya	Kasbi	14	Direct farmers (1 woman and 13 men)
7	4 December 19	Kashkadarya	Kasbi	13	Contract farmers (3 women and 10 men)
8	5 December 19	Kashkadarya	Kasbi	14	Women from local communities
9	5 December 19	Kashkadarya	Kasbi	11	Men from local communities
10	6 December 19	Kashkadarya	Nishon	13	Women from local communities
11	6 December 19	Kashkadarya	Nishon	10	Direct farmers (10 men)
<b>Total</b>				<b>125</b>	

Source: Mott MacDonald December 2019

The following meetings with other stakeholders were undertaken to inform the ESIA study. See Table 4.2 for a list of meetings held.

**Table 4.2: Meetings with Project stakeholders**

Date	Region	District	Attendees	Type of attendees
3 December 2019	Syrdarya	Oqoltyn	6	Meeting with Oqoltyn District Hokimiyat and Indorama
3 December 2019	Syrdarya	Sardoba	2	Meeting with Sardoba District Hokimiyat and Indorama
5 December 2019	Kashkadarya	Kasbi	6	Meeting with Kasbi Hokimiyat, Indorama and Kasbi Farmers Association
6 December 2019	Kashkadarya	Nishon	6	Meeting with Nishon District Hokimiyat, Indorama and Farmers Association

Source: Mott MacDonald December 2019

These meetings were used to describe the Government-led land acquisition process completed for the project back in 2018, parties involved and their roles, role of the Company and gaps identified in meeting international compliance in respect of land acquisition and livelihood restoration planning.

#### 4.1.3 ESIA Disclosure Consultation

The ESIA documentation was disclosed via the Company website (<http://www.indorama-agro.com>) on 24 April 2020. The COVID-19 restrictions delayed the start of the public events with the ACs in the Project regions, so the overall disclosure period was extended to 96 days (against initially planned 60 days) to end on 30 July 2020. In response to pandemic restrictions an Interim Stakeholder Engagement Plan (i-SEP) was developed in April 2020 to ensure continued meaningful stakeholder engagement during the COVID-19 crisis. The i-SEP (Appendix B) was published on the Company's website with the other Draft ESIA documents (together the "ESIA package").

ESIA disclosure in the ACs started on the 1 June 2020 when the COVID-19 pandemic restrictions were lifted in the Project regions. Alternate approaches for community engagement were used and focused on distribution of the paper Project flyers and feedback forms via the 49 mahallas in directly and indirectly affected communities (Table 1.4). Seven (or 3%) of the 49 ACs in Kasbi and Nishon districts (Kashkadarya region) could not participate by providing their comments or opinions on the ESIA package because the quarantine

restrictions in these ACs<sup>2</sup> coincided with the Draft ESIA consultation period. 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.

No grievances were received from communities via the grievance mechanism during the ESIA disclosure period. 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.

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. 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 (Table 4.3).

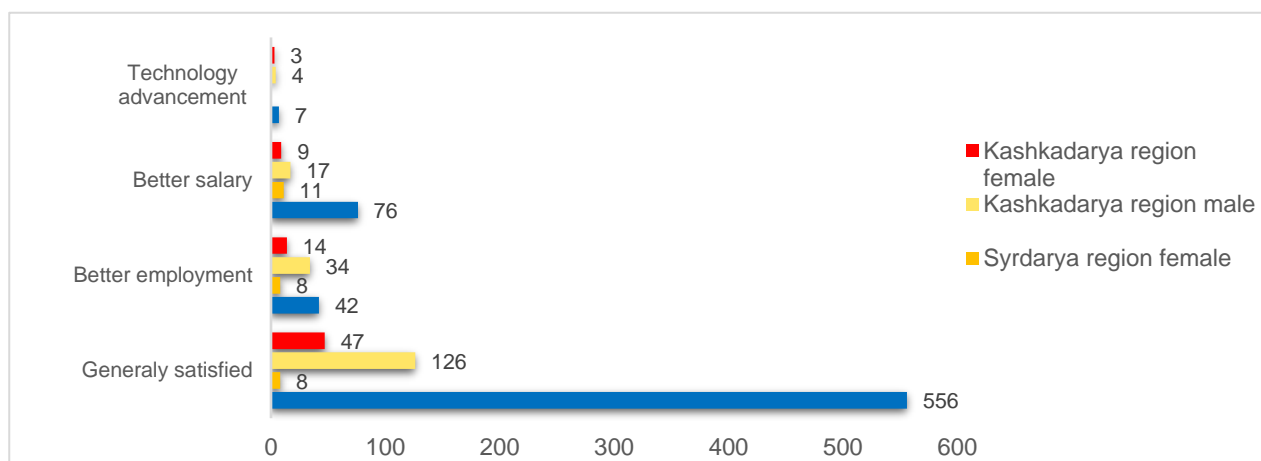
**Table 4.3: Positive and negative opinion of the Project**

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 Figure 4.1: below.

**Figure 4.1: Positive feedback of the Project from the ACs<sup>3</sup>**



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

<sup>2</sup> Mustakilobod, Okjanganl, Maymanok, Korakungiro, Kungiro, Pandiron in Kasbi district and Yangiobod in Nishon district. Only six people in Yangiobod (all male) were able to comment before quarantine started.

<sup>3</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.

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
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 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 have been provided to these identified community concerns with the reference to mitigation measures envisaged in the ESIA and ESAP. Details of the ESIA disclosure process including comments to community concerns and feedback overview are provided in the Summary Consultation Report (**SCR**) in Volume III of the ESIA Report – Appendices. The SCR describes in detail how the disclosure process was arranged and what were the consultation outcomes.

Respondents from both regions (53 respondents in total) also commented on the lack of employment opportunities for young adults as there are no skilled jobs for young people in the ACs and the young adults in the Project affected area are added in the vulnerable group of stakeholders (Table 4.4).

The Company has also consulted interested stakeholders. The objective was to ensure that interested NGOs/CSOs and human rights activists (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.

Six comments/questions were received from local human rights activists. These included: (i) a question on the Project feedback mechanism and access of CSOs to such a mechanism, (ii) a proposal for a partnership and cooperation in monitoring environmental and social performance of the Project, (iii) a comment expressing an opposition to the Project and cotton farming in general, (iv) a question on interrelationship between this cotton farming project of the Company in Kashkadarya and Syrdarya regions and IFC-funded project in Fergana region, and state quotas imposed on the farmers, (v) and (vi) two questions on the possibility for human rights activists to be involved in third-party monitoring of measures against child labour and forced labour. The key point of human rights activists' interest is thus on building up a partnership with the Project to carry out monitoring during the cotton weeding and harvesting period (April-November). Since continuous monitoring is a commitment of the Company stipulated in the Project ESAP, engagement of third parties will be further discussed with all interested stakeholders and promoted by the Project with support from ILO. The ILO is currently developing the monitoring methodology for the Project and will provide training of independent monitors to be engaged in the Project labour monitoring activities.

International disclosure of the ESIA package was undertaken via 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. Three questions arrived via this mechanism, all were from the NGO "Bankwatch" and related to (i) the timing of the public consultation, (ii) availability of the response summary for the public and (iii) indicators/expectations for the public engagement.

Responses have been provided to all comments and questions received from NGOs and human rights activists as described in detail in the CSR in Volume III of the ESIA Report – Appendices.



## Conclusions on the Draft ESIA consultation and disclosure

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 ACs) and promote participation of women (1,908 female respondents or 32% of the total respondents who indicated their gender in the feedback forms). Almost all (97%) of the ACs approached in the ESIA consultation provided their feedback/comments/concerns associated with the Project.

The latest consultation results conducted in June-July 2020 as part of ESIA disclosure have informed the ESIA, this SEP and stakeholder engagement programme (Section 5.6) to address certain concerns and/or consultation outcomes, identified as follows:

- Improve gender sensitivity in consultation activities
- Improve attention to vulnerable groups in consultation and general Project activities
- Improve the warning system around spraying
- Seek solutions to the stalks and straw issue (to address the associated loss of livelihoods).

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 pandemics protective measures imposed by the government. Seven communities that were locked in quarantine in Kashkadarya region 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, SCR and SEP in Uzbek language to share the final ESIA findings, consultation outcomes as well as information of the 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.

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.

New Project stakeholders have been identified during the ESIA disclosure:

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

All new stakeholders are included in the Project stakeholder matrix in this SEP (Table 4.4) to ensure that consultation and disclosure with the key stakeholders continues beyond the ESIA process throughout the lifecycle of the Project.

## 4.2 Stakeholders Analysis

At this stage, the Project has identified ten groups of key stakeholders, reviewed their interests and suggested communication and consultation methods for each group as summarised in Table 4.4.

The Project recognises that marginalised and disadvantaged groups are likely to experience impacts differently from the mainstream society. Consultation activities will be used to gather information and opinions on how different groups are affected. Project consultation and information disclosure will take into consideration logistical and cultural factors such as language, physical access, literacy levels, and time availability of these groups.

If you are a stakeholder who has not been identified in the table below but would like to be kept informed about the Project, please contact the Project CLO at the address provided in Chapter 6.

**Table 4.4: Project Stakeholders and Engagement 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	Project monitoring methodology	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 website
<b>(I) Project affected communities, vulnerable and marginalised groups</b>																				
● 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									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					
● 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	X
● IFC and associated consultants			X	X	X	X	X		X					X	X	X
<b>(IV) International Organisations</b>																
● International Labour Organization	X					X		X						X	X	
● International Cotton Advisory Committee	X				X	X						X		X	X	X
● Better Cotton Initiative	X				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			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			X	X	X

• Elena Urlaeva											
• Zohid Zokirov											
• Arslabai Utepov											
<b>(IX) Suppliers, Contractors and Private Businesses</b>											
• Local supplier	x		x	x			x	x	x	x	x
• Local contractors	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

## 5 Stakeholder Engagement Programme

### 5.1 Overview

The stakeholder engagement activities serve two key purposes:

1. Disclosing appropriate information about the Project – Disclosure of relevant Project information helps stakeholders understand the risks, impacts and opportunities of the Project. Consultation activities are more informed and constructive if stakeholders have accurate and timely information about the Project, its potential environmental and social impacts, how these will be avoided or mitigated, and how the Project's positive impacts will be maximised.
2. Providing relevant stakeholders with the opportunity to voice their opinions, preferences and grievances – This enables participation and involvement in the planning and design process and the enhancement of proposed impact mitigation measures.

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

### 5.2 Gender considerations

The EBRD expects its clients to identify any potential gender-specific and disproportionate, adverse impacts, and undertake to develop mitigation measures to reduce these. Where relevant, clients will be requested to enhance the positive gender impact of projects by promoting equality of opportunity and women's socio-economic empowerment, particularly with respect to access to finance, services and employment.

The Presidential Decree dated 2 March 1995, 'On measures to increase the role of women in state and public building in Uzbekistan, provides for larger representation of women at decision-making levels. In addition, in the Cabinet of Ministers there is a position of Deputy Prime Minister responsible for protection of women's rights and interests; similar positions have been created at all subnational government levels. The Government of Uzbekistan focuses on both supporting the role of women in all areas of social life and social protection of women at work.

Uzbekistan is not included into the 2018 Gender Gap Index due to the lack of gender statistics. In Women, Business and the Law index Uzbekistan was given 70.63 by the World Bank Group. The average global score is 74.71. Uzbekistan economy shows better index, than Jamaica, Indonesia and Egypt, but worse than all the CIS countries.

The key NGOs focusing on gender issues have been identified as stakeholders (also included in Table 4.4) and will be continuously engaged throughout the Project in line with this SEP.

### 5.3 Inclusion and Continuity

The consultation process will capture both men and women's views and reflect their different concerns and priorities about impacts, mitigation mechanisms, and benefits. Consultation and disclosure will be carried out as a continuous process throughout the design, construction and operations phases of the Project.

All communication and disclosure will be in Uzbek language. Local communication channels and public mass media will be used to enable accessibility of information to the greatest number of people. Different forms of media such as television and radio will be used to communicate information to those with literacy problems.

### 5.3.1 Web-resources

The Company's web-site (<http://www.indorama-agro.com>) will be used to advertise the Project documentation, report on the progress and publish relevant news of interest to the public about the Project.

## 5.4 Community Liaison Officer

The Company has appointed two male CLOs; one each for Kashkadarya and Syrdarya regions. The Project will appoint two additional female CLOs, one for each region. So, in total, there will be four CLOs, one male and one female for each region. CLOs will be responsible for community liaison and arranging communications with project affected communities in the two Project regions. The CLOs will be constant throughout the Project and will be largely responsible for implementation of the SEP in their respective regions, particularly receiving and channelling comments and concerns during Project preparation phase and management of the community grievance mechanism during the construction and operational phases. The CLOs will also attend and record stakeholder engagement activities and maintain lines of communication with the ACs.

## 5.5 Specific approach during COVID-19 Restrictions

The mandatory COVID-19 pandemic restrictions that coincided with the active stage of the ESIA consultation and may continue for some time in the coming future, have been taken into account and alternate plans for stakeholder engagement and disclosure have been included in the engagement programme to substitute some traditional consultation approaches initially elaborated at the ESIA scoping phase as summarised in Table 5.1.

Due to limited access to internet and smartphones in Uzbekistan<sup>4</sup> and the Project affected areas, alternate approaches for engagement with the ACs include disclosing information to affected stakeholders by means of paper Project flyers and feedback forms. The focus on television communications with the ACs will promote wider dissemination and outreach.

Since other interested stakeholders (none-ACs) have sufficient access to online services and telephone connectivity, engagement by e-mail, telephone and via the Project site is a preferred option for their engagement during the COVID-19 crisis.

As soon as travel and social distancing restrictions, restrictions on public assembly are lifted, the Project will revert to traditional methods of engagement. Should any new restrictions or circumstances apply to the Project in the longer term, the engagement strategy and methods will be reconsidered by the Project and the SEP updates will be disclosed to all interested stakeholders.

### 5.5.1 Attention to vulnerable groups

Elderly and disabled members of the community may find it difficult to access information online which will be one of the preferred option during Covid-19 restrictions. There may also be mobility restrictions on these stakeholders which could impact their ability to access hard copies of documentation and feedback forms. As such, engagement channels will include TV adverts, mahallas centres to display Project information and dedicated telephone line communication (via Project CLOs) to receive comments and / or grievances.

Women within the local communities may also be restricted in relation to time which can be allocated to attending consultation and accessing information. Information will readily be available in mahallas and can be accessed at convenient timeframes that can accommodate family life and household responsibilities. The CLOs will monitor feedback from vulnerable groups and additional ways of engaging them in the decision-making process will be developed as required. Project information and feedback forms will also be available online so that young people with good access to online resource are engaged in the consultation process.

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<sup>4</sup> In 2018, smartphone penetration in Uzbekistan stood at just over 30% and the number of internet users was around 52%.

## 5.6 Engagement Programme

Table 5.1 below outlines the sequence, timing and responsibilities of disclosure and consultation activities for the Project.

The alternate engagement programme used for the ESIA disclosure during the COVID-19 crises in June-July 2020 is detailed in Appendix B.



**Table 5.1: Stakeholder engagement timescales and responsibilities**

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
<b>1) Scoping Phase Engagement</b>			
Consultations, interviews and meetings with the key Project stakeholders during the ESIA scoping phase	<p>July 2019 (completed).</p> <p>Meetings to disclose information about the proposed investment, receiving views and comments about the Project from key stakeholders, data collection to inform the comprehensive Feasibility Study.</p>	The Consultant.	No changes required.
Disclosure of the ESIA Scoping Report Project leaflet and SEP	<p>By 23 September 2019 (completed).</p> <p>Documents to be disclosed in Uzbek language.</p> <p>Adverts to be placed for one week in local newspapers, the Hokimiyats' webs-sites in Project districts that the ESIA Scoping Report and SEP are available for review identifying where to locate the documents and how to submit comments.</p> <p>The ESIA Scoping Report and SEP will be published via Hokimiyats' webs-sites in Project districts, disclosed via e-mail to interested stakeholders and made available in hard copy upon request.</p> <p>Project leaflet with a summary of the Project scoping findings will be made available in hard copy in the ACs via mahallas.</p>	<p>The Consultant will prepare documents in Uzbek language.</p> <p>The Consultant will issue the Project leaflet.</p> <p>Project CLOs to disclose ESIA Scoping Report and SEP to key Project stakeholders, publish at the District Hokimiyats' web-sites (and make them available in hard copies upon request.</p> <p>The CLOs to disclose the Project leaflet in hard copies in the ACs via mahallas.</p>	No changes required.
Comments on SEP and ESIA Scoping Report	<p>Feedback collection will stay open till 20 May 2020.</p> <p>All comments will be received by the Company via Project CLOs and forwarded to the Consultant for consideration and inclusion in the ESIA Documentation.</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 and the Consultant.	No changes required.

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
<b>2) ESIA Phase Engagement – Draft ESIA Report Disclosure</b>			
Consultations, social study	December 2019 (completed) Site visit to meet meetings with local government to fill identified information gaps. Focus group discussions with different categories of affected farmers (former farmers, contracted farmers, Indorama employees, community members, men and women) to further address information gaps and identify livelihood impact, needs and opportunities to inform the LRP	The Consultant. The Consultant will issue the Project leaflet. To support the consultations and the FGDs.	No changes required.
Announcement of the forthcoming disclosure of the draft ESIA Package and the planned public exhibition events	Two weeks prior to Draft ESIA Report presentation at the public exhibition event (before 20 April 2020). 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. Adverts will include links and addresses where draft ESIA Report and NTS will be accessible in electronic and hard copies. Letters of invitation to Hokimiyats, mahallas, environmental authorities and other Project stakeholders if relevant.	The Project CLOs and Consultant.	Within two weeks of the disclosure of the ESIA package (during the first two weeks of May 2020): <ul style="list-style-type: none"> <li>• Adverts will be place 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> </ul> Email invitations for a video-call with interested NGOs to be sent two-weeks prior to such video-call occurring.
Disclosure of the Draft ESIA Report and related documents	At least two weeks prior to the public exhibition, for 60 days (target date is 20 April 2020). NTS document and Draft ESIA Report to be disclosed in Uzbek via the District Hokimiyats' webs-sites in Project districts. NTS to be made available in hard copy in the ACs via mahallas in the same locations as the Project leaflet and SEP. Comment boxes and feedback form will be provided in mahallas to allow for anonymous comments to be submitted.	The Consultant to prepare NTS and Draft ESIA Report in Uzbek language. The Project CLOs to post documents on the Company website and take NTS to the mahallas in hard copies.	Within four weeks of the disclosure of the ESIA package (during the month of May 2020): NTS document and Draft ESIA Report to be disclosed in Uzbek via the District Hokimiyats' webs-sites in Project districts. <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</li> </ul>

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
Public exhibition events	<p>By 20 May 2020.</p> <p>Project exhibition events in Kashkadarya and Syrdarya region 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>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>Comment boxes and feedback form will be provided to allow for anonymous comments to be submitted.</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>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>feedback form distributed to local affected communities.</p> <p>Hard copies will not be available in public places due to the risk of contamination.</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. 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>	<p>The Project CLOs to collect and feedback to the Consultant.</p>	<p>Feedback and comments on the ESIA Package will be collected via feedback forms, 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 CLOs in Kashkadarya and Syrdarya.</p> <p>Feedback boxes will also be available at the local mahallas.</p>
Media communications	<p>As requested, or when press releases deemed relevant.</p>	<p>The Project CLOs.</p>	<p>This activity will be increased to ensure wider dissemination and outreach during the period when Covid-19 restrictions are in place.</p>

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
Disclosure of the Final ESIA and related documents	<p>After the ESIA disclosure period is ended (total 96 days) before the end of 2020.</p> <p>The Final ESIA and related documents to be disclosed in Uzbek and English via the Company's webs-site..</p> <p>The Final NTS, Final CSR and Final SEP to be made available in hard copy in the ACs via mahallas in the same locations used for disclosure of the Project Leaflet and feedback forms.</p>	<p>The Consultant to prepare the Final ESIA package in Uzbek and English languages.</p> <p>The Project CLOs to post documents on the Company website, make available in hard copy upon request as well as take NTS, SCR and SEP to the mahallas in hard copies.</p>	<p>Regular updates will be shared via local newspapers and local radio in respective regions</p> <p>No changes required based on the assumption that Covid-19 restrictions have been lifted by mid-August 2020.</p> <p>A link to the Project site to access NTS, SCR and SEP to be provided by the Project CLOs to all mahallas via e-mail communication or Telegram group if COVID-19 restrictions are reinstated in the Project area going forward.</p>
Lenders Disclosure	<p>Draft ESIA Report and related documents to be disclosed by Lenders in English and links to Company's disclosure provided (on April 2020).</p>	<p>The Consultant to prepare the English version of the Final ESIA package.</p>	<p>No changes required.</p>
Engagement with interested stakeholders/NGOs/CSOs/human rights activists	<p>-</p>	<p>The Company.</p>	<p>A video/audio-call and e-mail communications by the Company with interested stakeholders/NGOs/CSOs/local human rights activists following the first month of disclosure and no later than 31 July 2020). The interested stakeholders/NGOs/CSOs/human rights activists to share their concerns and issues via e-mail beforehand to ensure focused discussion during video/audio-calls. Dates and invite for video/audio-call to be shared 7 days in advance.</p>
Post-disclosure engagement with the ACs after quarantine restrictions are lifted	<p>Keep comment boxes and feedback forms in Mustakilobod, Okjangal, Maymanok, Korakungiro, Kungiro, Pandiron communities in Kasbi district and Yangiobod community in Nishon district for one month after quarantine restrictions are lifted to reach out to people who were not able to comment on the ESIA.</p> <p>Make advertisements via mahallas and provide CLOs contact details for vulnerable groups who may not come in person but are interested to share their concerns and opinions of the Project.</p>	<p>The Project CLOs.</p>	<p>No changes required on the assumption that Covid-19 restrictions have been lifted by mid-August 2020.</p> <p>A link to the Project site to access NTS, SCR and SEP to be provided by the Project CLOs to these mahallas via e-mail communication or Telegram group if COVID-19 restrictions are reinstated in the Project area going forward.</p>

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
	<p>Make sure that mahallas centres are opened in hours convenient for women to come and share their views and opinions.</p> <p>Make sure that links are provided to online feedback forms and the Project materials to engage young people in the consultation.</p> <p>Collect and review comments from the ACs and update the Summary Consultation Report as necessary.</p> <p>The CLOs to monitor feedback from vulnerable groups to inform the SEP and general Project activities.</p> <p>The Final NTS, Final SCR and Final SEP to be made available in hard copy in the ACs via mahallas in the same locations used for disclosure of the Project Leaflet and feedback forms (before the end of 2020).</p>		
<b>3) Development Phase Engagement</b>			
<p>Ongoing community liaison and grievance logging, resolution and reporting</p>	<p>Communications with the ACs via mahallas.</p> <p>CLOs contact details to be provided to vulnerable groups.</p> <p>Weekly grievance reporting by the Company and Branch Management.</p> <p>Prior to the start and end of construction, and other key changes to inform the ACs on likely impacts and mitigation.</p> <p>Disclosure of leaflets with construction schedules to the ACs.</p>	<p>The Project CLOs. Contractor.</p>	<p>Distribution of the Project updates via Telegram notifications to mahallas.</p> <p>E-mail communications on grievance reporting.</p> <p>Construction schedule updates via Telegram notifications and Project website.</p>
<p>Regular updates on the Project website, social media, in newspapers and on radio</p>	<p>Updates when activities change, milestones are reached, etc.</p> <p>Provision of public domain information (via Project website, newspapers, TV and radio) as it becomes available, such as information on management of construction impacts, monitoring reports and annual reports.</p>	<p>The Project CLOs.</p>	<p>Updates via Project site and Telegram notifications.</p> <p>Public domain information via popular local TV channels.</p> <p>Publication on monitoring reports and annual reports on the Project website.</p> <p>A link to the Project site to access monitoring reports and annual reports to be provided by the Project CLOs to the mahallas via e-mail communication or Telegram group.</p>

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
Engagement with interested stakeholders/NGOs/CSOs/human rights activists	Monitoring methodology to create local capacity of independent monitors who shall be engaged in the monitoring of measures to prevent any forms of child labour and forced labour in the Project supply chain or any other operations it is dealing with. Training of independent monitors. Notification of any changes in the Project programme, activities change, reached milestones.	ILO. The Company. Project CLOs.	Video/audio calls with interested NGOs/CSOs/human rights activists. On-line training for monitors. E-mail communication and notifications.
Updating Environmental and Social Management Plan (ESMP)	Regular updates of the ESMMP during the construction phase.	The Company. Contactors.	No changes required
Updating SEP	Prior to the start and at the end of construction, when any changes to the Project occur. Upload updated versions to the Project website. Make available in hard copy upon request as well as take updated SEP to the mahallas in hard copies.	The Project CLOs.	A link to the Project site to access the updated SEP to be provided by the Project CLOs to the mahallas via e-mail communication or Telegram group.
Annual Reporting	Project specific annual report to the International Lenders summarising Project performance, CLOs' activities including grievances and updates to the SEP.	The Company.	No changes required.
<b>4) Operation Phase Engagement</b>			
Engagement with interested stakeholders/NGOs/CSOs/human rights activists	Third party monitoring missions during the cotton harvesting period. Disclosure of third-party monitoring mission reports to the interested stakeholders via Project website. The CLOs to make the monitoring report available in hard copy in the ACs via mahallas.	The Company. Project CLOs.	Virtual monitoring missions (optional). Conference calls, e-mail communication and notifications to the interested stakeholders. A link to the Project site to access the third-party monitoring mission reports to be provided by the Project CLOs to the mahallas via e-mail communication or Telegram group.
Notifications to communities before spraying operations in the fields	Establish a Telegram group with mahallas to warn communities of spraying operations in the fields. Written notifications to be placed in mahallas centers. Project CLOs contact details to be provided to collect any grievances.	The Company. Project CLOs.	No changes are required.

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
Grievance logging, resolution and reporting	Bi-annual grievance reporting to the Company's and branch management.	The Project CLOs.	No changes required.
Updating SEP	Annually for the duration of the Loan Agreement.	The Project CLOs.	No changes required.
Annual reporting	Annual E&S Reporting to International Lenders	The Company.	No changes required.

## 6 Public Grievance Mechanism

### 6.1 Overview

Having a grievance mechanism is a national<sup>5</sup> and international requirement the Project needs to comply with. Like all good grievance mechanisms, this one permits anonymous complaints, respects the confidentiality of the complainant(s) involved, and protects both the complainant and the Project from retaliation. The public grievance mechanism is based on the principles of being legitimate, accessible, predictable, equitable, and transparent, rights compatible, and dialogue based. The grievance mechanism can help identify critical issues, encourages learning and identifying ways for continuous improvement.

A grievance can be defined as an actual or perceived problem that might give grounds for complaint. As a general policy, the Project will work proactively towards preventing grievances through the implementation of impact mitigation measures (as identified by the ESMP) and community engagement. Anyone will be able to submit a grievance to the Project if they believe a practice is having a detrimental impact on the community, the environment, or on the quality of life. They may also submit comments and suggestions. The sections below consider confidentiality and anonymity and the Project's grievance resolution process.

### 6.2 Confidentiality and Anonymity

The Project will aim to protect a person's confidentiality when requested and will guarantee anonymity in annual reporting. Individuals will be asked permission to disclose their identity. Investigations will be undertaken in a manner that is respectful of the aggrieved party and the principle of confidentiality. The aggrieved party will need to recognise that there may be situations when disclosure of identity is required, and the Project will identify these situations to see whether the aggrieved party wishes to continue with the investigation and resolution activities.

### 6.3 Grievance Reporting and Resolution

In order to introduce and implement the public grievance mechanism and the Project will establish and provide an operational mechanism to communities to send their feedback or grievances via Project CLOs.

The main steps in handling grievances are to: receive and record, categorise, acknowledge, investigate, respond, allow for recourse/appeal and follow-up, and close out.

Receive and record / acknowledge grievances will be logged in a formal logging system for which the CLO will be responsible. People may register grievances using the form in Appendix A or by contacting the CLO directly, reporting to their settlement representative or online using the Project website. Contact details for the CLO will be included in appropriate Project communication materials such as the Non-Technical Summary document.

Categorise: the CLO will classify grievances according to Table 6.1.

Investigate: where investigations are required, Project staff and outside authorities as appropriate, will assist with the process. The CLO will collaborate with the Company management to identify an appropriate investigation team with the correct skills to review the issue raised. The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities.

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<sup>5</sup> RoU Law "On Appeals from Individuals and Legal Entities" of 03.12.2014 No.378.



**Respond/follow-up/close out:** the CLO will explain in writing to the complainant (or where literacy is an issue orally) the review process, the results, any changes to activities that will be undertaken to address the grievance and how the issue is being managed to meet appropriate environmental and social management systems. In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions.

**Table 6.1: Grievance classification criteria**

Classification	Risk Level (to health, safety or environment)	Response
Low	No or low	The grievance may not be related to Project performance, it may be a comment, or a request. CLO will acknowledge complaint within 7 days and conduct an investigation if required. The CLO will document findings and provide a response within 30 days of receiving. Response is likely to have minimal cost in addition to time spent on addressing the issue.
Medium	Possible risk and likely a one-off event	CLO will acknowledge complaint within 7 days. The CLO and an appropriate investigation team will conduct investigation. The Site Manager or EHS Officer may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response within 30 days of receiving complaint. The corrective action is likely to be straight forward involving changing a piece of equipment or procedure which does not take long or have substantial cost implications to implement.
High	Probable risk and could reoccur	CLO will acknowledge the complaint within 7 days and will get the Project Manager to organise a major investigation team for prompt investigation and resolution. Work may be stopped in the affected area. The CLO will provide a response within 30 days of receiving complaint. If more time is needed to complete the investigation this will be communicated to complainant within 15 days of receiving complaint. As necessary the response will include a press release. The corrective action may be complex or sensitive involving changing equipment or a procedure which requires training of staff and has substantial cost implications.

Grievance will be closed out in the register as:

- **Resolved.** The resolution has been communicated, agreed and/or implemented.
- **Unresolved.** The complainant did not accept the proposed resolution and has appealed to other entities for resolution.
- **Abandoned.** The complainant is no longer contactable and efforts to trace whereabouts have been unsuccessful.

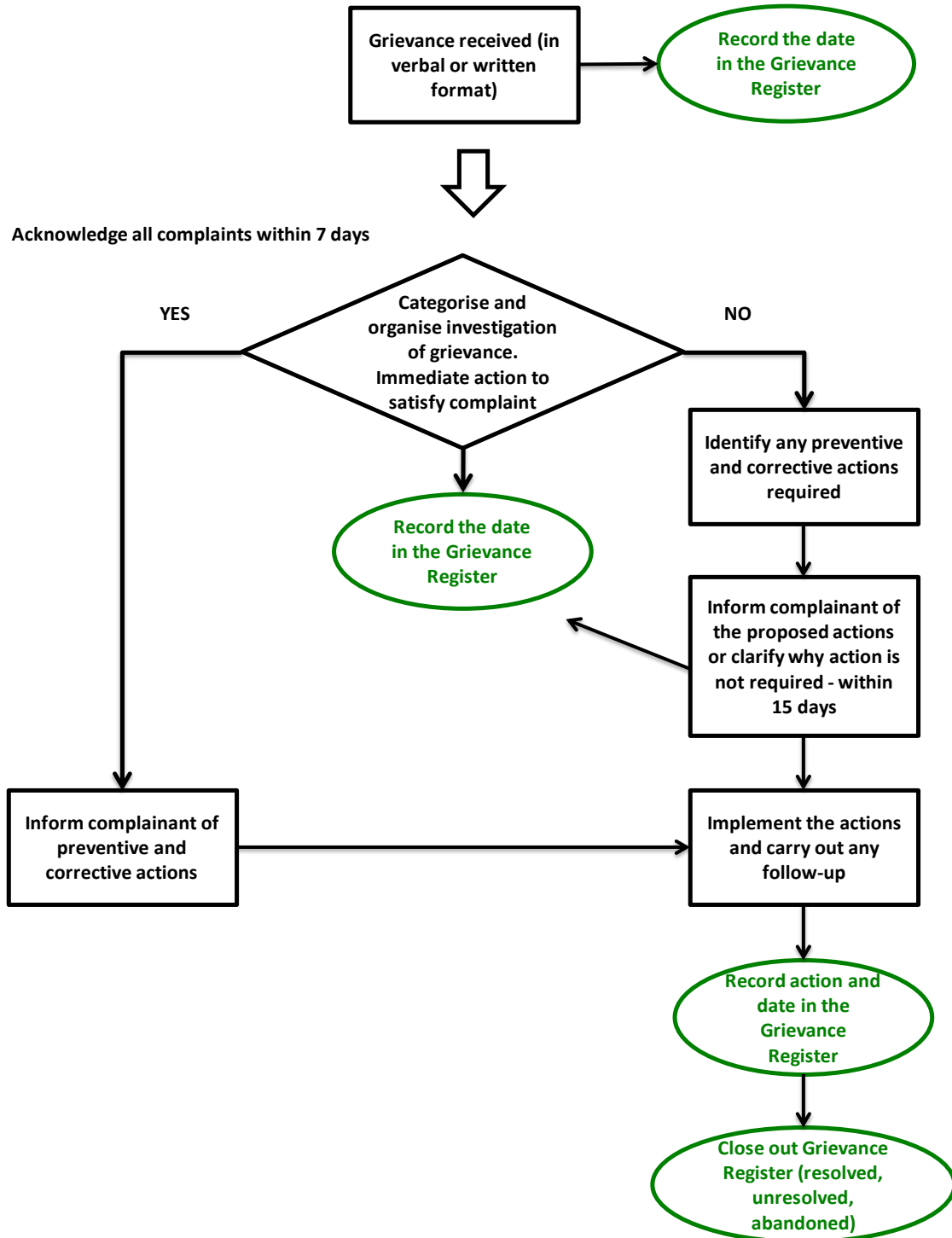
The CLO will summarise grievances weekly during construction and bi-annually during operation removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity. The procedure will be at no cost and without retribution to Project affected persons and stakeholders. The grievances processing procedure is depicted in Figure 6.1.

During the planning, construction and operation phases of the Project, the Company has nominated two male CLOs, Ravshan Tadjiev in Kashkadarya region and Jasur Khusankhodjaev in Syrdarya region. The Project will appoint two additional female CLOs, one for each region. So, in total, there will be four CLOs, one male and one female for each region. Grievances and comments should be sent to the contacts below, where possible by using the form provided in Appendix A.

**Table 6.2: Project Community Liaison Officers**

Contacts	Project CLOs in Kashkadarya region	Project CLOs in Syrdarya region
Company:	FEE Indorama Agro, Kashkadarya Branch	FEE Indorama Agro, Syrdarya Branch
Name:	TBN Ravshan Tadjiev	TBN Jasur Khusankhodjaev
Tel.:	+998905066863	+998998212000
Email:	<a href="mailto:rtadjiev@indorama.uz">rtadjiev@indorama.uz</a>	<a href="mailto:jkhusankhodjaev@indorama.uz">jkhusankhodjaev@indorama.uz</a>

Figure 6.1: Flowchart for Processing Grievances



## 7 Monitoring and Reporting

### 7.1 SEP Reporting

The SEP will be reviewed by the CLOs throughout the Project planning phase as deemed necessary or at least once, before and after the Project construction phase and annually once the Project is operational in order to assess whether:

- Type of consultation and disclosure activities are appropriate for different groups of stakeholders
- The frequency of consultation activities is sufficient
- Grievances are being adequately dealt with, and
- The stakeholder list remains appropriate and whether engagement should cease or be extended to any stakeholders.

Additional updates influenced by the Project development may be required.

### 7.2 CLO Reporting

The CLOs' reporting will include:

- Monthly grievance reporting to the Company at the Project planning phase
- Weekly grievance reporting to the Company during the Project development phase
- Biannual grievance reporting to the Company during the operation phase, and
- Annually to inform Annual E&S Report to the International Lenders (for the duration of the Loan Agreement) and SEP updates.

### 7.3 Annual Reporting

A Project specific Annual Report to the International Lenders will be produced for the duration of the Loan Agreement summarising Project EHS performance, ESAP progress, CLO activities including grievances and updates to the SEP.

### 7.4 Project Environmental and Social Management Plan

As part of the ESIA, an ESMP will be prepared to detail specific monitoring and reporting requirements for environmental and social performance of the Project.

### 7.5 Performance Evaluation

Performance in stakeholder engagement will be evaluated by the Company and the Project CLOs against the goals and objectives set out in this SEP. The evaluation will review to what extent the SEP activities have been completed and how the identified goals have been achieved. Evaluation results and any lessons learned will be incorporated in the respective SEP updates.

# Appendices

A.	Grievance Form	37
B.	Alternate i-SEP for the ESIA Disclosure Phase	38

# A. Grievance Form

<b>Public Grievance Form</b>	
<b>Reference Number:</b>	
<p><i>Please enter below your contact information and grievance. This information will be dealt with as confidential. If you still wish to remain anonymous, please enter your comment / grievance in the box below without indicating any contact information – your comment / grievance will still be considered and addressed. Please be advised that no response or feedback will be provided to anonymous grievance forms.</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 incident or grievance</b> (What happened? Where did it happen? Who did it happen to? What is the result of the problem?):	
<b>Date of incident / grievance</b>	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
<b>What would you like to see to resolve this problem?</b>	
<p><b>Please return this form to:</b>  <b>Project CLO</b>                  _____                  _____</p> <p><i>Internal Use Only</i>                  Grievance received by: _____                  Date: _____</p>	

## **B. Alternate i-SEP for the ESIA Disclosure Phase**

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

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
<p>Announcement of the forthcoming disclosure of the draft ESIA Package and the planned public exhibition events</p>	<p>Two weeks prior to Draft ESIA Report presentation at the public exhibition event (before 20 April 2020). 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. Adverts will include links and addresses where draft ESIA Report and NTS will be accessible in electronic and hard copies. Letters of invitation to Hokimiyats, mahallas, environmental authorities and other Project stakeholders if relevant.</p>	<p>The Project CLOs and Consultant.</p>	<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>
<p>Disclosure of the Draft ESIA Report and related documents</p>	<p>At least two weeks prior to the public exhibition, for 60 days (target date is 20 April 2020). NTS document and Draft ESIA Report to be disclosed in Uzbek via the District Hokimiyats' web-sites in Project districts. NTS to be made available in hard copy in the ACs via mahallas in the same locations as the Project leaflet and SEP. 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. 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): 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>
<p>Public exhibition events</p>	<p>By 20 May 2020. 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. 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. 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. Any such public meetings</p>

Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
	<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>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).</p> <p>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.



Activity	Timing / Detail	Responsibility	Alternative Approach during Covid-19
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.

