

Indorama Agro – Interim Stakeholder Engagement Plan

April 2020

Information disclosure and stakeholder engagement are cornerstones of project social impact management. This Interim Stakeholder Engagement Plan (i-SEP) was developed to ensure continued meaningful stakeholder engagement during the COVID-19 crisis and mandatory social distancing measures and other restrictions on movement and public meetings stipulated by the Government of Uzbekistan (GoU).

Keeping in view current situation on COVID-19, GoU has put in place various restrictions ranging from prohibition on meetings, limited number of gatherings, travel restrictions for free movement of people, Restrictions on movement between regions and period of such restrictions are extended frequently. Schools and Other educational institutions are closed and moved to Virtual learning mode. This limits traditional measures of Stakeholder engagement.

This SEP focuses on the information disclosure and consultation to take place during the 60-day disclosure period of the Environmental and Social Impact Assessment (ESIA) and associated documents (together the “ESIA package”, which are available online at [insert Indorama website address where ESIA package is disclosed]. It is a complement to the project’s regular Stakeholder Engagement Plan (SEP). Once the restrictions currently in place are lifted, Indorama Agro will revert to implementing the detailed SEP.

General approach during COVID-19 restrictions

Several possible alternative approaches for disclosing information and engaging with stakeholders have been considered and are presented in more detail in Table 1 below. Due to limited access to internet and smartphones in Uzbekistan¹ and the project affected areas, alternate approaches will focus on reaching affected stakeholders by means of paper leaflets and feedback forms as well as traditional media. Awareness about SEP and how to access these documents will be spread on regular intervals through local radio and Television channel.

However, it is assumed that engagement with interested stakeholders, in particular NGOs active at the national level and involved in the protection of human rights, labour rights as well as other social development initiatives, enjoy sufficient internet connectivity to access the ESIA package electronically and engage with Indorama Agro directly via email and other means. In addition, Indorama Agro will organize a direct video-consultation with those NGO keen to participate. To register your interest to participate in such a video call, please contact: murojaat.ial@uz.indorama.com

Comments on the ESIA Package.

Comments on the ESIA Package can be submitted via email, telephone call or regular mail to Indorama. These comments will be aggregated, assessed and, where relevant, used to finalize the ESIA Package. A summary table with responses to all comments will be published alongside the final ESIA Package following the 60-day disclosure period. 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:	Shahnoza Imomova	Shoxista Sotiboldieva
Email:	murojaat.ial@uz.indorama.com	

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

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Table 1: ESIA Phase Engagement – Draft ESIA Report Disclosure

Activity	Timing/Detail	Responsibility	Alternative Approach during Covid-19
Announcement of the forthcoming disclosure of the draft ESIA Package and the planned public exhibition events	<p>Two weeks prior to Draft ESIA Report presentation at the public exhibition event (before 06 March 2020).</p> <p>Adverts to be placed in local newspapers, on local radio, and Hokimiyats' web-sites for one week identifying dates and locations of the disclosed documents and the public exhibition events, and how to submit comments. Adverts will include links and addresses where draft ESIA Report and NTS will be accessible in electronic and hard copies.</p> <p>Letters of invitation to Hokimiyats, mahallas, environmental authorities and other Project stakeholders if relevant.</p>	The Project CLOs and Consultant.	<p>Within two weeks of the disclosure of the ESIA package (during the first two weeks of May):</p> <p>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.</p> <p>Hard copies will not be available in public places due to the risk of contamination.</p> <p>Email invitations for a video-call with interested NGOs to be sent two-weeks prior to such video-call occurring.</p>
Disclosure of the Draft ESIA Report and related documents	<p>At least two weeks prior to the public exhibition, for 60 days (target date is).</p> <p>NTS document and Draft ESIA Report to be disclosed in Uzbek via the District Hokimiyats' web-sites in Project districts.</p> <p>NTS to be made available in hard copy in the ACs via mahallas in the same locations as the Project leaflet and SEP.</p> <p>A comment boxes and feedback form will be provided in mahallas to allow for anonymous comments to be submitted.</p>	<p>The Consultant to prepare NTS and Draft ESIA Report in Uzbek language.</p> <p>The Project CLOs to post documents on the District Hokimiyats' web-sites in four districts and take NTS to the mahallas in hard copies.</p>	<p>Within four weeks of the disclosure of the ESIA package (during the month of May):</p> <p>NTS document and Draft ESIA Report to be disclosed in Uzbek via the District Hokimiyats' web-sites in Project districts.</p> <p>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 Company.</p> <p>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.</p> <p>Hard copies will not be available in public places due to the risk of contamination.</p>
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>A 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>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 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</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 below), 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</p>

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	complexity of the issue and source of information needed to provide the answer.		Syrdarya (see contact information above). Feedback boxes will also be available at the local mahallas.
Media communications	As requested, or when press releases deemed relevant.	The Project CLOs.	This activity will be increased to ensure wider dissemination and outreach during the period when Covid-19 restrictions are in place. Regular updates will be shared via local newspapers and Local radio in respective regions.
Disclosure of the Final ESIA package	After the ESIA disclosure period is ended (total 60 days) Final NTS document and Final ESIA Report to be disclosed in Uzbek via the District Hokimiyats' web-sites in Project districts. Final NTS to be made available in hard copy in the affected communities via mahallas in the same locations used for disclosure of the Draft NTS.	The Consultant to prepare the Final NTS and Final ESIA Report in English and Uzbek language. The Project CLOs to post documents on the District Hokimiyats' web-sites in four districts, make available in hard copy upon request as well as take NTS to the mahallas in hard copies.	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 Uzbek; links to Company's disclosure provided (April 2020).	The Consultant to prepare the English and Uzbek versions of the Final ESIA Report and disclosure package.	No changes required
Video-call with interested stakeholders/NGOs/CSOs	n/a	n/a	In order to ensure that 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 (ie during the first two weeks of June). Interested stakeholders/NGOs/CSOs, will share their concerns and issues via email beforehand to ensure focused discussion during Video/audio-call. Dates and invite for Video/Audio-call will be shared 7 days in advance.

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