

Spetskomuntrans

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# KHMELNITSKY SOLID WASTE PROJECT

Stakeholder Engagement Plan



Spetskomuntrans

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## Stakeholder Engagement Plan

**FINAL PUBLIC**

**PROJECT NO. 70057536**

**OUR REF. NO. 70057536/SEP**

**DATE: AUGUST 2020**

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# 1 INTRODUCTION

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## 1.1 THE PROJECT

1.1.1. The European Bank for Reconstruction and Development (herein known as 'the EBRD') is considering providing a senior loan to the communal enterprise Spetskomuntrans, a municipal company in the city of Khmel'nitsky (herein known as the 'City'). The proposed loan will be used to facilitate the development of an integrated Solid Waste Management (SWM) system by:

- Closing and rehabilitating the existing landfill;
- Constructing a new engineered landfill (the 'proposed landfill'); and
- Constructing a new Mechanical Biological Treatment (MBT) Facility (the 'proposed MBT Facility').

1.1.2. The development is herein referred to as the 'Project'.

## 1.2 PROJECT NEED

1.2.1. The City's MSW generation was approximately 92,000 tons per annum in 2017 and is anticipated to increase to approximately 107,000 tons per annum within 10 years. Nearly all this waste is landfilled, with no prior treatment, at the existing landfill Site. The current leachate management process consists of the collection and recirculation of leachate into the landfill. The existing landfill Site has been in operation since 1956, and is approaching maximum capacity, thus the need for replacement is increasingly pressing.

1.2.2. The existing landfill is not engineered or operated to European Union (EU) Standards and several major fire events have occurred, most recently in April 2018. These events have not resulted in casualties but re-emphasize the need for an integrated SWM system for the City.

## 1.3 PROJECT DESCRIPTION

1.3.1. The Project consists of the following elements:

- The closure, capping and rehabilitation of the existing landfill which will include:
  - The capping of the disposal area, including measures to prevent excessive rainwater input and leachate generation, and to prevent interference with the Landfill Gas (LFG) Collection System;
  - A review of the LFG Collection System; and
  - Reshaping the existing landfill body to stabilise the slope and prevent sliding, including surface water runoff measures and treatment options for the existing leachate pond from which leachate is currently collected for recirculation.
- Construction of a new engineered landfill cell (total capacity will be between 500,000 to 700,000 tons of MSW), the proposed landfill will include:
  - A natural geological barrier, improved with geosynthetic clay liners and a High-Density Polyethylene (HDPE) lining system;
  - A leachate collection drainage layer and piping system for leachate collection;
  - A LFG collection layer and system (above the waste layer); and

- Construction of a proposed MBT Facility to the north of the existing landfill. The proposed MBT facility will have a processing capacity of approximately 107,000 tons of MSW per annum (approximately 300 tons per day);
- Upgrading equipment with at least one additional bulldozer and a compactor;
- The provision of road improvements, signage, fencing and fire prevention / fire extinguishing measures; and
- Overall improvements to the operational procedures.

1.3.2. In total, the Project will cover an area between 20.5 hectares (ha), divided into the following components:

- Closure and rehabilitation of existing landfill – 8.9 ha;
- Proposed Landfill – 6 ha; and
- Proposed MBT Facility – 5.6 ha.

1.3.3. In the interests of clarity, the areas covered by the existing landfill, the proposed landfill and the proposed MBT facility are referred to as the Project Site throughout this report.

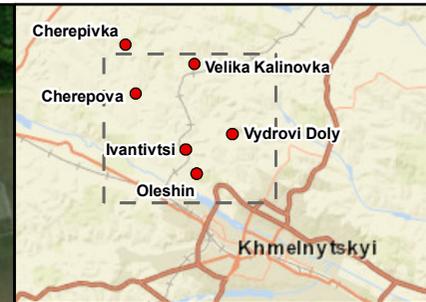
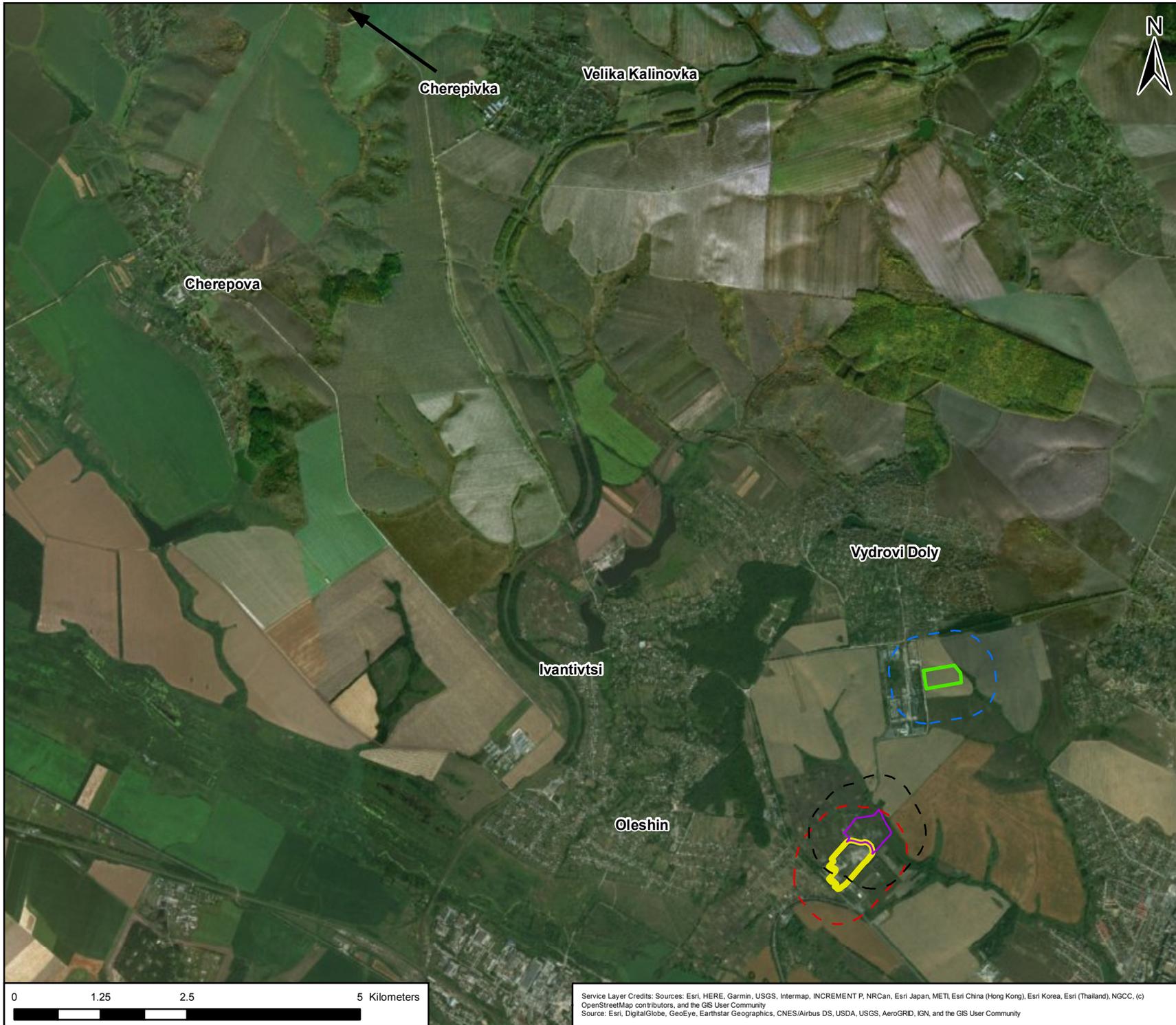
## **1.4 PROJECT LOCATION**

1.4.1. The Project is located to the north of the centre of Khmelnytsky, in the Khmelnytskyi Oblast in western Ukraine. The existing landfill is located on the northern outskirts of the city, to the north of the Pivdennyi Buh River (the 'main river'). The existing landfill lies to the north of Myru Avenue. To the south of Myru Avenue the land slopes downhill towards the Pivdennyi Buh River. The major roads servicing the Site are Zakhidna Okruzhna Street and Myru Avenue which run adjacent to the Project Site (the south-western edge).

1.4.2. The landfill is located outside the urban area of the city and is bound by agricultural land and/or villages on all sides. The villages surrounding the existing landfill include Oleshin, Velika Kalinovka, Ivankivtsi, Cherepova and Cherepivka. The villages contain community facilities in the form of schools, an emergency centre, local hospital, dentist and shops. There are residential properties associated with these villages located in the vicinity of the Site, with the closest being located 70m to the south of the existing landfill.

1.4.3. The proposed landfill will be located directly adjacent to the existing landfill, to the north-east, while the proposed MBT Facility will be located approximately 1km north of the existing landfill.

1.4.4. Figure 1-1 shows the Project location.



**Key**

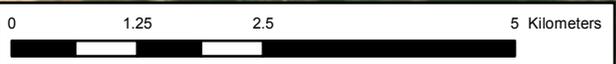
- Proposed MBT Facility
- Potential Sanitary Protection Zone (MBT)
- Existing Landfill
- Proposed Landfill
- Sanitary Protection Zone
- Potential Sanitary Protection Zone (Landfill)



Client:  
EBRD

Project:  
KHMELNITSKY SOLID WASTE PROJECT

Title:  
Figure 1-1  
Project Location Plan



Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community  
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Date: 08/08/2019 Scale: 75,000 @ A4  
Drawn: PM Checked: DE Approved: JW

## 1.5 STAKEHOLDER ENGAGEMENT PLAN

- 1.5.1. This Stakeholder Engagement Plan (SEP) is a live document, which sets out the implementing bodies' commitments in relation to stakeholder engagement, consultation and disclosure activities in connection with the Project.
- 1.5.2. The City of Khmelnytsky has overall responsibility for the Project, and the implementation of the Project at the local level will be the responsibility of Spetskomuntrans. As per EBRD requirements there will be a 120-day disclosure period, within which time relevant Project documents will be available for review at the City Council Office, in the Mayor's Office in Khmelnytsky and in the schools (or equivalent) in all adjacent villages.
- 1.5.3. Stakeholder engagement and consultation is undertaken with the aims of informing and improving Project decision-making and building understanding by actively involving individuals, groups and organisations in the Project. Stakeholder engagement helps to:
- Identify and involve all potentially affected groups and individuals;
  - Generate a good understanding of the Project amongst those that will be affected;
  - Identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders;
  - Ensure that mitigation measures are appropriate (implementable, effective, and efficient); and
  - Establish a system for long-term communications between the Project and communities that is of benefit to all parties.
- 1.5.4. This SEP details engagement undertaken with stakeholders during the feasibility stages of the Project and serves as a guide during future phases. This SEP will need to be revised following Project approval, to inform on-going stakeholder engagement through the various stages of Project development (construction and operation).
- 1.5.5. The SEP was disclosed to the public in February 2020. Since this disclosure COVID-19 restrictions were implemented in the Ukraine. As such a number of changes were made to the engagement activities undertaken during the disclosure period (February 2020 to July 2020), these are detailed in a 'Short-Term Stakeholder Engagement Plan' which is shown in Appendix B. Furthermore, as part of its status as a 'live' document will be reviewed prior to the beginning of construction and updated if required to reflect COVID-19 measures in the City of Khmelnytsky.

## 2 REGULATORY AND REQUIREMENTS FRAMEWORK

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### 2.1 NATIONAL REQUIREMENTS

2.1.1. The Project is required to comply with all applicable Ukrainian legislation. The key Ukraine legislation is as follows:

- Law No. 2059-VIII 'On Environmental Impact Assessment' (2017): The EIA Law implements the principles of Directive 2011/92/EU (which preceded the current EU EIA Directive (2014/52/EU)). The EIA Law divides Projects into two categories (1<sup>st</sup> and 2<sup>nd</sup>) and consists of 17 articles. Article 7 and 8 are of particular relevance to this SEP, as they detail the requirements for public hearings;
- Law No. 187/98-VR 'On Waste' (2018): The Law prohibits the disposal of non-recycled waste to landfill; and
- No. 2939-VI 'On access to public information' (2011): Which supports equal access to information for everyone and creates mechanisms for every person to access public information.

### 2.2 EBRD REQUIREMENTS

2.2.1. The Project needs to adhere to EBRD's Environmental and Social Policy (2014) and the ten EBRD Performance Requirements (PRs). The Project has been assessed against PRs 1, 2, 3, 4, 5, 6, 8 and 10. PR 7: Indigenous Peoples and PR 9: Financial Intermediaries are not applicable, as there are no indigenous peoples within close proximity to the Project, and no financial intermediaries are involved. The main PR associated with this SEP is PR 10: Information Disclosure and Stakeholder Engagement. The key pertinent requirements of this PR are:

**Table 2-1 – PR10: Key Requirements**

- Identify the various individuals or groups i) who are affected or likely to be affected by the Project; or ii) may have an interest in the Project.
- Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status.
- The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.
- Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.
- Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.
- Information for Category A Project shall be disclosed to the public for a period of 120 days.

## 3 EXISTING STAKEHOLDER / COMMUNITY ENGAGEMENT AND AWARENESS PROGRAMMES

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### 3.1 EXISTING PROCESS

- 3.1.1. The City has a public relations department which is responsible for the disclosure of information to the public and manages social media accounts. The City has a Facebook account (<https://www.facebook.com/hmmiskrada>) with 13,000 subscribers. Information about the City's activities and developments is published on both the City website (<http://khm.gov.ua/>) and the Facebook account. In accordance with the City's processes, public consultation notices are published on the City's website.
- 3.1.2. The City has a grievance department which is responsible for citizens appeals. During the site visit, a meeting was conducted with the deputy head of the grievance department. The City follows the Law of Ukraine On Appeals of Citizens (1996 (No. 394/96), as most recently amended in 2016 (No. 1404/16)). According to this law, citizens can appeal either via personal appointment, via the hot line number or via a written letter. In accordance with Article 20 of this Law, appeals are considered and resolved no later than one month from the date of receipt, and not later than 15 days from the date of receipt, where no further investigation is required. If issues raised in the appeal cannot be resolved within a month, then the recipient will be informed about the further timeline needed to resolve the issue. The grievance department registers all letter and emails in an electronic database.
- 3.1.3. In the first half of the year in 2019, approximately 32,000 queries were raised, and the majority of them were resolved positively. The queries were mainly related to obtaining free land plots or requesting disabled / medical help financial assistance. Specific waste management grievances were raised mostly by women and covered the following issues:
- Creating better system for waste management;
  - Community health and safety in relation to fire incidents at the existing landfill which had led to smoke nuisance;
  - Waste pickers who reside close to the landfill site and cause a nuisance to local residuals living areas and surroundings; and
  - Odour associated with the landfill, predominantly during windy weather.
- 3.1.4. At the City's first Economic Development Forum in the Spring of 2017, the Mayor presented broad conceptual plans describing the aims of the SWM system, and approximately 650 local residents and businesses were present.
- 3.1.5. No formal stakeholder consultation was undertaken with local residents on the Project prior to the start of the Environmental and Social Impact Assessment (ESIA) process. The Head of the Village Council in Oleshin and a few of village deputies have been briefly informed about the Project, however, no specific information on the Project location, layout and timeframes have been disclosed.

## 3.2 ESIA PROJECT CONSULTATION

### CONSULTATIONS UNDERTAKEN TO DATE

3.2.1. As part of undertaking the ESIA for the Project, the following consultations have been undertaken up to date:

- 4<sup>th</sup> – 6<sup>th</sup> June 2019 - during the initial stage the core environment team undertook a site visit, to refine their understanding of the Project, collect baseline environmental and social data and consulted with interested parties; and
- 1<sup>st</sup> – 5<sup>th</sup> July 2019 - a second site visit was undertaken by the core environment team and technical specialists to collect further baseline data, undertake environmental and social surveys and undertake scoping consultation activities.

3.2.2. A summary of the two site visits are provided below.

**Table 3-1 – Meetings and Site Visit Summary – June 2019**

Meeting / Site Visit	Date	Attendees	Summary
Site visit	5 <sup>th</sup> June 2019	<ul style="list-style-type: none"> <li>■ Project Director, WSP</li> <li>■ Assistant Project Manager, WSP</li> <li>■ Local Consultant, WSP</li> <li>■ Representatives, City of Khmelnitsky</li> <li>■ Deputy Major,</li> <li>■ Landfill Operator, Spetskomuntrans</li> </ul>	<ul style="list-style-type: none"> <li>■ General tour of the existing landfill, the proposed landfill site and the proposed MBT site to gain some initial baseline information and an understanding of the key constraints.</li> <li>■ Visit to the nearest residential villages in Vydrovi Doly (north), Ivankivtsi (north west) and Oleshin (west).</li> <li>■ Visit to the Bio Gas Energy Facility located on the southern side of the existing landfill site.</li> <li>■ Visit to Spetskomuntrans vehicle storage and maintenance area in Khmelnitsky.</li> <li>■ Tour of waste collection facilities within the City of Khmelnitsky.</li> </ul>
Meeting with Head of Village Council and the City of Khmelnitsky	6 <sup>th</sup> June 2019	<ul style="list-style-type: none"> <li>■ Project Director, WSP</li> <li>■ Assistant Project Manager, WSP</li> <li>■ Local Consultant, WSP</li> <li>■ City of Khmelnitsky, economy department</li> <li>■ Deputy Mayor</li> <li>■ Representative, City of Khmelnitsky</li> <li>■ Head of Village Council for Oleshin Village, Velika Kalinovka, Ivankivtsy, Cherepova, and Cherepivka.</li> </ul>	<ul style="list-style-type: none"> <li>■ Meeting with the Head of the Village Council to discuss their general understanding of the Project and to hear their general views with regards to key issues, ESIA focus and experiences with the existing landfill, and any community feedback on the proposed Project and the land acquisition process.</li> <li>■ Visit to see the closet residential receptors (located adjacent to the road on the southern side of the existing landfill).</li> <li>■ Visit to one of the City of Khmelnitsky's offices to discuss outstanding queries, questions raised during the site visit and the next steps.</li> </ul>

**Table 3-2 – Meetings and Site Visit Summary – July 2019**

<b>Meeting / Site Visit</b>	<b>Date</b>	<b>Attendees</b>	<b>Summary</b>
Proposed Landfill Preliminary Design Meeting	2 <sup>nd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP Project Manager,</li> <li>■ WSP and IDOM team, and</li> <li>■ Local Consultant, WSP</li> </ul>	<ul style="list-style-type: none"> <li>■ Meeting to discuss the baseline Project information gathered as part of the design activities and the design of the proposed landfill.</li> </ul>
Site Visit	2 <sup>nd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP Assistant Project Manager,</li> <li>■ WSP and IDOM team, and</li> <li>■ Representative, City of Khmelnytsky</li> </ul>	<ul style="list-style-type: none"> <li>■ General tour of the existing landfill, the proposed landfill and the proposed MBT Facility to gain further baseline information and to further understand the key constraints.</li> </ul>
Environmental and Social Surveys	2 <sup>nd</sup> July – 3 <sup>rd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP Project Manager,</li> <li>■ WSP Assistant Project Manager</li> <li>■ WSP team</li> <li>■ Representative, City of Khmelnytsky</li> </ul>	<ul style="list-style-type: none"> <li>■ Morning and afternoon noise / air quality / odour surveys at representative receptors.</li> <li>■ Observations of the waste picking activities.</li> <li>■ Visual water surveys of wells and the stream in close proximity to the existing landfill.</li> <li>■ Meetings with residents to discuss their experience of the land acquisition process and the proposed Project.</li> </ul>
Waste Pickers Focus Group	2 <sup>nd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP team</li> <li>■ Representative, City of Khmelnytsky</li> </ul>	<ul style="list-style-type: none"> <li>■ Focus Group meeting with the waste pickers to discuss their types of work, working conditions, average wage and their general understanding of the Project.</li> </ul>
Group of local landowners	2 <sup>nd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP team</li> <li>■ Representative, City of Khmelnytsky</li> </ul>	<ul style="list-style-type: none"> <li>■ Meeting to understand the local land owners' view on the land acquisition process undertaken to date</li> </ul>
Legal Team / Land Acquisition Meeting	2 <sup>nd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP team</li> <li>■ Land Acquisition Officer from the City of Khmelnytsky</li> <li>■ Land Acquisition Officer from Spetskomuntrans</li> </ul>	<ul style="list-style-type: none"> <li>■ Meeting to understand the land acquisition process undertaken to date and the land acquisition process moving forwards with the Project.</li> </ul>
Village Councils Meeting	3 <sup>rd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP Project Manager</li> <li>■ WSP and IDOM team</li> <li>■ Local Consultant, WSP</li> <li>■ National EIA Team</li> </ul>	<ul style="list-style-type: none"> <li>■ Meeting with the Head of the Village Council (Oleshin) and four other heads from the surrounding villages to hear their views with regards to key issues and to answer topic specific questions posed by the specialists.</li> </ul>
Bio Gas Energy Facility Meeting	3 <sup>rd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP and IDOM team</li> </ul>	<ul style="list-style-type: none"> <li>■ Meeting with Bio Gas Energy Facility operator to discuss operating regimes and plant specifications.</li> </ul>

Meeting / Site Visit	Date	Attendees	Summary
City of Khmelnytsky and Spetskomuntrans Meeting	3 <sup>rd</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP and IDOM team</li> <li>■ Local Consultant, WSP</li> <li>■ National EIA Team</li> <li>■ Representatives from the City of Khmelnytsky and Spetskomuntrans</li> </ul>	<ul style="list-style-type: none"> <li>■ Representatives from the City of Khmelnytsky and Spetskomuntrans to discuss:</li> <li>■ Organisational arrangements and policies;</li> <li>■ Health and safety (H&amp;S) procedures;</li> <li>■ National / regional waste management legislation / policy; and</li> <li>■ Existing and Projected waste collection procedures / vehicles / system and source segregation processes.</li> </ul>
Scoping / ESIA Methodology Presentation	4 <sup>th</sup> July 2019	<ul style="list-style-type: none"> <li>■ WSP team</li> <li>■ Representatives from the City of Khmelnytsky</li> <li>■ Representatives from Oleshin (including the Head of the Village Council).</li> </ul>	<ul style="list-style-type: none"> <li>■ Presentation to summarise the Project and the scoping / ESIA methodology for the Project. All residents were invited to attend via the City of Khmelnytsky's website, the City also agreed to notify the heads of the surrounding villages.</li> </ul>

- 3.2.3. During the Scoping / ESIA Methodology Presentation (4th July), a WSP ESIA Specialist in collaboration with Spetskomuntrans provided a presentation about the Project to local representatives. The meeting was advertised on the City's website (<http://khm.gov.ua/>) a week prior to the presentation. The meeting was undertaken in one of the City's meeting rooms. Key attendees in this meeting included the local village council lawyer, a resident who lived near to the landfill site and is the Head of the Village Council, and representatives from the City of Khmelnytsky. The meeting provided a useful platform to further develop the attendees understanding of the Project, which it was understood would be distributed to the heads of the surrounding villages through their community meetings. The Head of the Village Council was also able to provide feedback on the local community's key concerns and issues which had been obtained since the first site visit.
- 3.2.4. The meeting that was held in Oleshin Village Hall the previous day (3<sup>rd</sup> July), and was attended by the head of the Village Council (Oleshin) and four other village heads from the surrounding villages, also provided further information on the concerns and aspirations expressed by residents near to the landfill, and this information is included here for completeness.
- 3.2.5. Key concerns and issues raised during the presentation included:
- Potential obstruction of local community access rights particularly during the construction;
  - Previous concerns expressed with regards to Roma waste pickers chopping local woodlands during winter;
  - Potential concerns as to how the Project would affect the surrounding villages masterplan which included for the provision of potential new housing adjacent to the existing and proposed landfills – no timing for the housing are known; and
  - Lack of awareness and information about the Project in particular the process of closing and rehabilitating the existing landfill.
- 3.2.6. Apart from the issues and concerns aforementioned, the attendees were generally positive about the Project.

**Figure 3-1 – Presentation to Explain the Scoping / ESIA Methodology**



**FURTHER MEETINGS AND CONSULTATIONS**

3.2.7. During the development of the ESIA and the national Environmental Impacts Assessment (EIA), additional meetings / consultations will take place. The consultation activities are summarised in the table below.

**Table 3-3 – Further Meetings / Consultations**

<p>Consultations on the ESIA:</p> <ul style="list-style-type: none"> <li>■ According to the EBRD PR 10, for Category A Projects, a public hearing will be conducted at the Village Hall in Oleshin (or equivalent) and the ESIA will be disclosed for a period of 120 days. The ESIA, Non-Technical Summary and LRF will be made available at the City Council Office, in the Mayor’s Office in Khmelnytsky and in the schools (or equivalent) in all adjacent villages. The addresses of the schools (or equivalent) are:             <ul style="list-style-type: none"> <li>• Oleshyn School – 13a Shkilna Street, Village of Oleshyn, 31312</li> <li>• Ivankivtsi Lyceum – 2 Shkilna Street, Village of Ivankivtsi, 31314</li> <li>• Cherepova School – 2 Centralna Street, Village of Cherepova, 31316</li> <li>• Cherepivka School – 25 Trublaini Street, Village of Cherepivka, 31305</li> </ul> </li> </ul> <p>Consultations on the national EIA:</p> <ul style="list-style-type: none"> <li>■ Consultations with the public, providing sufficient time and opportunities to review EIA materials and participate in the decision-making process according to the detailed procedures outlined in the applicable Ukrainian Law (25-35 business days);</li> <li>■ Review of the EIA by the ‘Authorised Body’ (i.e. the Ministry of Ecology and Natural Resources), considering public opinion and an analysis of the information gathered by business entities during the public debate; and</li> </ul>
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- The Ministry of Ecology and Natural Resources shall also establish the Unified EIA Registry (to be available online, with a free access for public).

## 4 STAKEHOLDER IDENTIFICATION

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- 4.1.1. The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project's zone of influence. In this approach, by mapping the zone of social influence, stakeholders are identified by area.
- 4.1.2. As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:
- Primary stakeholders – the individuals and groups who are affected directly by the Project; and
  - Secondary stakeholders – those parties which have influence on, but are not necessarily directly affected by, the Project.
- 4.1.3. The stakeholders which will be directly affected by the Project are summarised below.

### 4.2 WASTE-PICKERS

- 4.2.1. The waste-pickers who are formal employees of one of Spetskomuntrans' Contractors, were observed to reside in containers adjacent to the boundary of the existing landfill. It is estimated that there were approximately 12 'containers' in total. Out of approximately 40 waste pickers, 35-36 reside within the 'containers'. The 'containers' are in a poor condition and do not provide many basic features of adequate quality accommodation.

### 4.3 LOCAL LAND OWNERS (SELLING LAND TO SPETSKOMUNTRANS)

- 4.3.1. As presented below, Spetskomuntrans is carrying out its land acquisition programme in three phases. Phases I and II are associated with the Project. Phase I covers approximately 14 land plots and phase II approximately 20 land plots. The land acquisition programme for phases I and II has been completed.
- 4.3.2. The plots acquired during Phase I and II had all been officially designated as being in 'agricultural use', although in reality the land plots were not used for agricultural activities, due to their proximity to the existing landfill. After the sale has been agreed, the land plots ownership rights are being transferred to Spetskomuntrans, and the land use is then changed to 'industrial use'.
- 4.3.3. Spetskomuntrans acquires the land on the 'willing seller-willing buyer' basis, which is in compliance with national regulations. The gaps between the Ukrainian legislation and EBRD PR 5 requirements (particularly those related to compensating land at full replacement cost, and the disclosure of the land acquisition process to the local communities) are addressed in the Livelihood Restoration Framework (LRF) for the Project.

**Figure 4-1 – Spetskomuntrans' Phased Land Acquisition Programme**



**4.4 HOUSES LOCATED WITHIN THE SANITARY PROTECTION ZONE (SPZ)**

- 4.4.1. Approximately 27 residential dwellings are located within the SPZ of the existing landfill (the closest of which is located approximately 70m from the edge of the existing landfill boundary).
- 4.4.2. Spetskomuntrans understands the importance of the SPZ and will carefully consider its specification as the design process continues. The outcomes and mitigation measures included in the design, may facilitate the re-determination of the extent of the SPZ, which is undertaken through a separate legislative process to the consent. The extent of the SPZ will take into account the footprint of the access roads, cabling or pipes (as appropriate).
- 4.4.3. During discussions with local residents, it was established that many of these residential dwellings are likely to be legal, i.e. where land owners initially built houses on the land designated as “agricultural” but then subsequently changed the land use to “residential”. Based on the existing legislation and Local Development Plan approved by the village council, the owners of the land plots that surround the Project, can construct summer houses (i.e. not a permanent residential structure) on their land even when it is designated as “agricultural”. However, permanent residential structures can only legally be built only on land designated as “residential” . As a result, the number of residential dwellings that could be affected could increase, if land owners decide to build residential dwellings on their land and then change their land plot designation to “residential”, thus putting additional properties within the SPZ.

## 4.5 VULNERABLE GROUPS

- 4.5.1. In Ukraine, vulnerable groups are described as groups or individuals "...that are more likely to suffer social damage from the impact of economic, environmental, industrial and other factors of modern life"<sup>1</sup>. This definition is broadly aligned with the EBRD definition of vulnerable people<sup>2</sup>.
- 4.5.2. Within the context of the Project, some individuals or groups are more vulnerable than the majority of the affected population and, if affected by the Project, will require the implementation of special livelihood restoration and / or assistance measures. Such groups might include:
- Roma waste pickers (men and women) who work at the existing landfill;
  - Owners of structures (it is possible that some residential dwellings were built without necessary permits), with no other property or place of residence;
  - Elderly and women single headed households, single parent households, households with multiple members, or those living below the poverty line or affected / displaced by the ongoing Ukraine-Russia conflict;
  - Persons whose socio-economic status is low, for example beneficiaries of social welfare; and
  - People with low-literacy levels who may have difficulties accessing information about the Project and or understanding contracts and other important documents, etc.
- 4.5.3. Vulnerability will be further assessed and confirmed as part of implementation of LRF.
- 4.5.4. Key primary and secondary stakeholders are identified in Table 4-1.

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<sup>1</sup> Agency for legislative initiatives (2015). Monetisation of Benefits: Experience of Other Countries and Conclusions for Ukraine (Policy Paper).

<sup>2</sup> EBRD PR1, footnote 7, page 4.

**Table 4-1 – Key Identified Stakeholders and Methods of Engagement**

Type	Stakeholder Name	Impact / Influence on Stakeholders (Direct, Indirect, Induced)	Preferred Method of Engagement
Project Shareholders / Internal Stakeholders	<ul style="list-style-type: none"> <li>■ EBRD;</li> <li>■ City of Khmelnytsky; and</li> <li>■ Spetskomuntrans.</li> </ul>	The group will directly influence and impact the Project through decision-making process.	Spetskomuntrans is to submit annual Environment and Social (E&S) reports to the EBRD. Spetskomuntrans employees will be consulted through the HR department and a grievance form is to be made available for use.
Permitting Bodies, Local Government Agencies	<ul style="list-style-type: none"> <li>■ Ministry of Ecology and Natural Resources;</li> <li>■ Ministry of Health Ukraine;</li> <li>■ Ministry of Social Policy;</li> <li>■ Ministry of Internal Affairs of Ukraine;</li> <li>■ Ministry of Regional Development, Building and Housing and Communal Services of Ukraine;</li> <li>■ Ministry of Social Policy of Ukraine;</li> <li>■ Emergency Services;</li> <li>■ Ministry of Culture of Ukraine;</li> <li>■ The National Commission on the State Regulation in the Field of Energy and Utility Services;</li> <li>■ The State Ecological Inspection of Ukraine; and</li> <li>■ The State Agency of Energy Efficiency and Energy Saving of Ukraine.</li> </ul>	This group will have a direct influence / impact on the Project through approving permits and enforcing legislation.	Spetskomuntrans is to write official letters / e-mails and undertake meetings with the permitting bodies and local government agencies (as appropriate).
Local residents	<ul style="list-style-type: none"> <li>■ Local residents from the villages of Oleshin, Velika Kalinovka, Ivankivtsi, Cherepova and Cherepivka;</li> <li>■ Residents within the existing and new SPZs; and</li> <li>■ Residents living along access roads.</li> </ul>	These residents will be directly and indirectly affected as part of the Project, where the risks may include nuisances and obstruction of community rights of way mainly during the construction stage of the Project. The Project would benefit this group through creation of direct, indirect and induced employment. Induced employment is created as a result of increased expenditure mainly during the construction stage.	Spetskomuntrans to facilitate monthly public meetings in local meeting halls / public centres (i.e. the Village Hall in Oleshin Village) during the construction phase, and first year of operation, reducing to annual meetings (once a year) during Operation. The existing Grievance Mechanism of Spetskomuntrans will be used to register and respond to any queries or grievances.
Local land owners	<ul style="list-style-type: none"> <li>■ Land Owners (individuals and businesses) selling land to Spetskomuntrans</li> </ul>	This group of stakeholders are interacting with Spetskomuntrans on the basis of a “willing buyer-willing seller” basis and Spetskomuntrans will make sure that the agreed compensation is at full replacement cost (see LRF for more details).	Spetskomuntrans will continue to have individual meetings with those selling land and disclose the LRF until all the landowners have been compensated as agreed and the land purchase process is complete. The existing Grievance Mechanism of Spetskomuntrans will be used to register and respond to any related queries or grievances.
Non-Governmental Organisations (NGOs)	Roma of Ukraine Ternipe and other national / international NGOs.	This group could directly and indirectly influence the Project through consultation with local communities and the facilitation of environmental and social campaigns.	The level of Spetskomuntrans engagement with this group of stakeholders will depend on partnership formed (i.e. for engaging with and supporting Roma.)
Recycling Organisations	Recycling organisations-Contractors working with Spetskomuntrans.	This group will directly influence the Project through the incorporation of stakeholders’ input / comments into their practices and activities and ensuring compliance with the EBRD standards (PR2: Labour and Working Conditions) during different stage of the Project.	Spetskomuntrans to negotiate contracts which include recycling references/obligations and monitor their implementation.
Vulnerable Groups	<ul style="list-style-type: none"> <li>■ Waste pickers;</li> <li>■ Single women headed households;</li> <li>■ Households with more than three children; and</li> <li>■ People with low literacy levels.</li> </ul> <p>Additional vulnerable groups include those earning below minimum wage, receiving</p>	This group will be directly and indirectly affected as a result of the Project. Vulnerable groups could be affected as a result of the Project construction and operation activities.	Spetskomuntrans to facilitate regular focus groups and workshops in order to consult with this group through face to face meetings organised by the Community Liaison Officer (CLO), where the frequency of these meetings will depend on the phase of the project and the amount and the nature of grievances submitted.

Type	Stakeholder Name	Impact / Influence on Stakeholders (Direct, Indirect, Induced)	Preferred Method of Engagement
	subsidies the elderly requiring assistance and those living with chronic illness.		
Universities	<ul style="list-style-type: none"> <li>■ Khmeltsky City University; and</li> <li>■ Local colleges.</li> </ul>	This group will indirectly influence the Project through student research, innovation and training the field of waste management.	Spetskomuntrans to interact with key universities / colleges on research and development and training provision.

## 5 STAKEHOLDER ENGAGEMENT PROGRAMME

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### 5.1 POTENTIAL ENVIRONMENTAL / SOCIAL EFFECTS

5.1.1. Beneficial environmental and social effects may be inclusive of but not limited to:

- Improved waste management (in accordance with waste hierarchy);
- Creation of job opportunities;
- Establishment of community initiatives and programmes;
- Upgrade of the road between the proposed landfill and the proposed MBT Facility;
- Reduced risk of fires;
- Improved landfill stability;
- Reduction of future impacts of waste disposal; and
- Increased waste disposal capacity.

5.1.2. Adverse environmental and social effects may be inclusive of but not limited to:

- Construction Phase:
  - Temporary loss of livelihood / income for affected waste pickers resulting from the closure of the exiting landfill and Project construction activities;
  - General community Health and Safety risks from construction, including the risk of children entering the Project site;
  - Lack of community engagement with local people with regard to the Project (notably construction activities);
  - Poor occupational health and safety practices which could potentially lead to increased illnesses and accidents among construction workers (fire, slips and falls);
  - Odours resulting in community nuisance;
  - Increases in local traffic movements and effects on community rights of way;
  - Potential noise and vibration effects relating to offsite and onsite construction vehicle movements / activities;
  - Visual effects during the construction, e.g. from lighting and the stockpiling of materials;
  - Soil excavation which could result in the migration of contaminants to agricultural lands. Risk of oil / petrol leaks / spills from machinery and vehicles which could result in soil / groundwater contamination; and
  - Increased accident risk, as a result of increased vehicles.
- Operational Phase:
  - Poor occupational health and safety practices which could potentially lead to increased illnesses and accidents among operational workers (fire, slips and falls);
  - Odours resulting in community nuisance;
  - Effects on air quality due to vented gas (methane and bio-aerosols) from the Project;
  - Potential operational effects (from air quality, water quality and noise) on habitats and species adjacent to the site and access route;
  - Increased accident risk, as a result of increased vehicles;

- Soil excavation which could result in the migration of contaminants to agricultural lands. Risk of oil / petrol leaks / spills from machinery and vehicles which could result in soil / groundwater contamination; and
- Potential health effects associated with vermin and bio-aerosols.

5.1.3. This SEP has been developed to address community concerns, with regard to potential environmental and social effects through the implementation of appropriate stakeholder consultation and information disclosure activities as outlined in Table 4-1.

## 5.2 STAKEHOLDER CONSULTATION AND INFORMATION DISCLOSURE

5.2.1. The stakeholder consultation and information disclosure will cover the following main activities:

- Timely disclosure of Project information in Ukrainian to the key stakeholders;
- Informed participation and meaningful two-way consultation with the affected stakeholders; and
- Development and implementation of a grievance mechanism to ensure that the affected stakeholders' concerns and issues are addressed in a timely manner.

### INFORMATION DISCLOSURE ACTIVITIES

5.2.2. The City of Khmelnytsky through the Spetskomuntrans, will disclose relevant information about the Project during the preliminary design stage, during detailed design stage, and then in an ongoing manner as the Project evolves. The information will be provided in Ukrainian and will cover all the key stages of the Project including the construction and operational phases. At this stage, the following documents will be disclosed for effective stakeholder communication:

- Non-Technical Summary (of the Environmental and Social Impact Assessment);
- Environmental and Social Impact Assessment;
- Environmental and Social Management Plan;
- Environmental and Social Action Plan;
- Stakeholder Engagement Plan; and
- Livelihood Restoration Framework.

5.2.3. The information above will be accessible to the public, including the affected communities / businesses. Hard copies of the documents will be made available at the City Council Office, at the Village Council in Oleshin, and in the Mayor's Office in Khmelnytsky. All the information will also be available at the City of Khmelnytsky website (<http://khm.gov.ua/>).

5.2.4. In addition, hard copies of the SEP, ESAP, LRF, ESMP and the ESIA NTS (which details where the full ESIA is available) will also be made available in the following locations:

- Oleshyn - 29/1 Centralna Street, Village Club, 31312
- Velyka Kalynivka - 1/3 Centralna Street, Village Club, 31312
- Ivankivtsi - 5/1 Levytskogo Street, Village Club, 31314
- Cherepova - 2 Provulok Centralnyi, Village Club, 31316
- Cherepivka - 13 Trublaini Street, Village Club, 31305

## CONSULTATION METHODS

5.2.5. Spetskomuntrans will use different consultation approaches and methods for different stages of the Project activities and stakeholder groups. The main communication methods and mechanisms that will be used to consult with key stakeholders are:

### Spetskomuntrans

5.2.6. Meetings will be undertaken every month to discuss two aspects (i) high level issues associated with SWM pertinent to the Project; and (ii) technical issues associated with the Project. The content and purpose of each meeting is described below.

#### High-level SWM

- In this meeting, the Spetskomuntrans will discuss pertinent legislation and high level national waste management policies / procedures, including:
  - Project review and update;
  - Resolving issues, obstacles or conditions that with the potential to hinder the implementation of the Project; and
  - Making of recommendations on high-level strategic and political matters, including objectives and priorities.
- Where appropriate, key shareholders such as the Ministry of Regional Development, Building and Housing and Communal Services of Ukraine, the Ministry of Ecology and Natural Resources and the City of Khmelnytsky will participate.

#### Technical Meeting

- In this meeting, Spetskomuntrans will discuss technical issues pertinent to the Project, including:
  - Overview of recent technical developments associated with the Project; and
  - Spetskomuntrans consult with the key regulators, including, for example, the Ministry of Ecology and Natural Resources, on all the related permits or licences and any additional ESIA / EIA requirements for the Project.
- Where appropriate, this meeting would comprise of representatives involved in technical Project delivery.

## PROJECT IMPLEMENTATION UNIT (PIU)/WORKING GROUP

5.2.7. The PIU would comprise representatives of Spetskomuntrans and the City of Khmelnytsky. Monthly meetings will be undertaken to:

- Review overall Project activities (concerning both technical and financial Project delivery);
- Review overall integration of the service provision associated with day-to-day Project activities, from preparation to implementation, monitoring to evaluation and financial reporting;
- Review management of local and international consultants;
- Escalate unresolved issues;
- Discuss common issues related to the Project and overcome any obstacles;
- Ensure the appropriate implementation of training / information exchange; and
- Hold seminars / workshops to ensure the development of the PIU (particularly with regards to measuring performance indicators).

## **CITY PUBLIC RELATIONS DEPARTMENT**

- 5.2.8. The City's public relations department which is responsible for the disclosure of information to the public and manages social media accounts. The social media counts should be used to: publish updates, share key Project milestones, make key Project-related announcements and provide Project news.

## **PUBLIC MEETINGS**

- 5.2.9. Spetskomuntrans will undertake public meetings to consult with the affected communities and businesses on the Project. In these meetings, Spetskomuntrans will discuss potential risks associated with the Project, including any road closures, effects associated with community rights of way and key construction activities.
- 5.2.10. Initial public meetings will be conducted at the early stage of the Project to ensure the local communities' concerns and comments are incorporated into the detailed Project design. Spetskomuntrans will allocate a Community Liaison Officer (CLO) who has the main responsibility for consultation with the affected communities / businesses.
- 5.2.11. Subsequent to the initial meetings, regular public meetings will be undertaken to ensure the affected community and business livelihoods are managed and concerns are properly addressed (see the LRF for further details).
- 5.2.12. As per EBRD requirements there will be a 120-day disclosure period, within which time relevant Project documents will be available for review at the City Council Office, in the Mayor's Office in Khmelnytsky and in the schools (or equivalent) in all adjacent villages.

## **FOCUS GROUPS AND WORKSHOPS (TARGETING VULNERABLE GROUPS)**

- 5.2.13. The identified vulnerable groups associated with the Project are; waste pickers who earn their living from collecting wastes at the sites, single women headed households, elderly people in need of assistance, those earning below minimum wage, those receiving allowances or subsidies, and other categories as defined in the EBRD PR1 (footnote 7, page 4).
- 5.2.14. Direct consultation in the form of focus groups will be conducted with the affected waste pickers to discuss livelihood restoration measures and the assistance they may require accessing benefits they are entitled to in line with existing legislation.
- 5.2.15. In addition, it is recommended that a separate focus group meeting is organised by Spetskomuntrans with local women to ensure gender aspects are considered at each stage of the Project. To ensure maximum attendance it is recommended that transport should be arranged, and that women are allowed to bring their children, if they need to.
- 5.2.16. Table 5-1 details all the stakeholder engagement activities that will be undertaken by Spetskomuntrans.

**Table 5-1 – Stakeholder Engagement Actions for the Project**

Activity	Stakeholders	Information Materials	Timeframe/Frequency	Responsibility	Location
Allocate a CLO and provide training to on dealing with grievances relating to the Project.	Local Communities / Businesses	<ul style="list-style-type: none"> <li>■ Project Leaflets;</li> <li>■ Non-Technical Summary;</li> <li>■ SEP; and</li> <li>■ LRF.</li> </ul>	Immediate / Prior to Construction	Spetskomuntrans	City of Khmelnytsky Offices
Engagement with local land owners during the disclosure of LPR	Local land owners who are willing to sell their land to Spetskomuntrans	<ul style="list-style-type: none"> <li>■ LRP</li> <li>■ Presentation with key slides – on compensation process</li> </ul>	During the disclosure period, and also during negotiations with each land selling land owners	Spetskomuntrans	Spetskomuntrans offices (where negotiations typically take place)
Place hard copies of related documents at the City Council Office, in the Mayor's Office in Khmelnytsky and in the schools (or equivalent) in all adjacent villages.	All	<ul style="list-style-type: none"> <li>■ Project Leaflets;</li> <li>■ Non-Technical Summary;</li> <li>■ ESIA; and</li> <li>■ LRF.</li> </ul>	Immediate / Prior to Construction	Spetskomuntrans	<ul style="list-style-type: none"> <li>■ City Council Office;</li> <li>■ Mayor's Office in Khmelnytsky; and</li> <li>■ In the schools (or equivalent) in all adjacent villages.</li> </ul>
Consult with related Ministries to obtain applicable environmental permits for the Project.	Ministry of Ecology and Natural Resources	<ul style="list-style-type: none"> <li>■ Non-Technical Summary;</li> <li>■ ESIA;</li> <li>■ Design Documents; and</li> <li>■ Monitoring Plans.</li> </ul>	Immediate / Prior to Construction During Operation (subject to requirements)	Spetskomuntrans	Ministry Office (or consultation through emails / formal letter)
Consult with related Ministries with regards to the legislative framework of relevance to the waste pickers.	<ul style="list-style-type: none"> <li>■ Ministry of Regional Development, Building and Housing and Communal Services of Ukraine; and</li> <li>■ Ministry of Social Policy.</li> </ul>	<ul style="list-style-type: none"> <li>■ SEP;</li> <li>■ LRF;</li> <li>■ Design Documents; and</li> <li>■ Monitoring Plans.</li> </ul>	Immediate / Prior to Construction	Spetskomuntrans	Ministry Office (or consultation through emails / formal letter)
Consult with the Ministry of Culture for Ukraine on the development of a Cultural Heritage Management Plan and Chance Finds Procedure.	Ministry of Culture	<ul style="list-style-type: none"> <li>■ Non-Technical Summary;</li> <li>■ ESIA;</li> <li>■ Design Documents; and</li> <li>■ Monitoring Plans.</li> </ul>	Prior to Construction	Spetskomuntrans	Ministry Office (or consultation through emails / formal letter)
Consult and collaborate with local emergency services.	Local Emergency Services	<ul style="list-style-type: none"> <li>■ Emergency Response Plan; and</li> <li>■ HSE Procedures.</li> </ul>	Immediate	Spetskomuntrans	City of Khmelnytsky Offices
Hold ESIA public meetings.	Affected communities / businesses and wider public.	<ul style="list-style-type: none"> <li>■ Project Leaflets;</li> <li>■ Non-Technical Summary;</li> <li>■ ESIA;</li> <li>■ SEP; and</li> <li>■ LRF.</li> </ul>	Immediate (then monthly)	Spetskomuntrans (CLO)	<ul style="list-style-type: none"> <li>■ City Council Office;</li> <li>■ Mayor's Office in Khmelnytsky; and</li> <li>■ In the schools (or equivalent) in all adjacent villages.</li> </ul>
Facilitate focus groups and workshops for affected vulnerable groups.	<ul style="list-style-type: none"> <li>■ Waste pickers;</li> <li>■ Single women headed households;</li> <li>■ Households with more than three children; and</li> <li>■ People with low literacy levels.</li> </ul> <p>Additional vulnerable groups include those earning below minimum wage, receiving subsidies the elderly</p>	<ul style="list-style-type: none"> <li>■ Project Leaflets;</li> <li>■ Non-Technical Summary;</li> <li>■ SEP; and</li> <li>■ LRF.</li> </ul>	Prior to Construction	Spetskomuntrans (CLO)	<ul style="list-style-type: none"> <li>■ City Council Office;</li> <li>■ Mayor's Office in Khmelnytsky; and</li> <li>■ In the schools (or equivalent) in all adjacent villages.</li> </ul>

Activity	Stakeholders	Information Materials	Timeframe/Frequency	Responsibility	Location
	requiring assistance and those living with chronic illness.				
Post-employment opportunities on the City website and on the Spetskomuntrans Office bulletin board, inform the waste pickers about employment opportunities through the aforementioned meetings.	Affected communities (including the waste pickers).	Employment adverts.	Immediate / Prior to Construction During Operation (subject to requirements)	<ul style="list-style-type: none"> <li>▪ City of Khmelnytsky; and</li> <li>▪ Spetskomuntrans.</li> </ul>	<ul style="list-style-type: none"> <li>▪ City website; and</li> <li>▪ Spetskomuntrans Office.</li> </ul>
Establish a grievance process and register and publish complaints summary on their website.	Affected communities / businesses.	Corrective measures.	Immediate / Prior to Construction During Operation	Spetskomuntrans (CLO)	<ul style="list-style-type: none"> <li>▪ Hotline number dedicated for the Project; and</li> <li>▪ Register of complaints published on Spetkomuntrans website.</li> </ul>

## 6 GRIEVANCE MECHANISM

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### 6.1 SPETSKOMUNTRANS / CITY HANDLING GRIEVANCES

- 6.1.1. Spetskomuntrans, will implement a formal grievance procedure during the early stages of the Project to receive the affected communities' / businesses' concerns and views. The City has already a grievance mechanism system in place in accordance with national law (Section 3.1). The City's grievance procedure will be used as a tool to assist the timely and successful resolution of stakeholder concerns, as well as to monitor the Project's relationship with the affected communities / businesses throughout all Project phases (including design, construction and operation). It is important that the mechanism is impartial, transparent and fair. A summary of complaints and the measures taken to resolve them will be made public on a regular basis, in accordance with PR10.
- 6.1.2. The appointed CLO will be responsible for coordination and handling of all grievances received from the community. A central grievance register will be created by the CLO, to record and manage any raised grievances. Any concerns / views can be brought to the attention of the PIU verbally (personally or by telephone) or in writing by filling the grievance form (by personal delivery, post, fax or e-mail to the address provided) without any costs incurred to the complainant.
- 6.1.3. Any verbal or written complaints can be raised using the hotline number as provided on the City website (<http://khm.gov.ua/uk/content/zvernennya-gromadyan>) or via the details provided below:
- Attention: Ms Ksenia Kosiuk
  - Head of Local Population Enquiries Department (Grievance Manager)
  - Postal Address: 29008, 1 Tolstoho Street, City of Khmelnytskyi, Ukraine
  - Telephone +38 097 893 35 16
  - E-mail address: [ksenia.kosyuk@gmail.com](mailto:ksenia.kosyuk@gmail.com)
- 6.1.4. An electronic and hard copy of the complaint's procedure and grievance form (Appendix A) is available in this SEP for use by the public. The grievance form will also be available on the websites of Spetskomuntrans, the City of Khmelnytsky and the Village Council.
- 6.1.5. All received complaints will be recorded in the grievance register within 15 working days and responded to within a maximum period of 30 working days. Both signed and anonymous grievances will be accepted. However, if the person filing a grievance wants to receive a written reply, they must provide reliable contact details. Each complaint will initially be screened, and the facts of the case verified by the CLO.
- 6.1.6. The agreed solution or response will be signed off by the CLO and where applicable the PIU. The corrective action and status of a complaint (closed, open) will be recorded in the grievance registry. The CLO is responsible for maintaining this register. All claims and answers will be kept at Spetkomuntrans Office. Any gender specific complaints will be addressed confidentially and will be handled by a relevant person.
- 6.1.7. In cases where the complainant is not satisfied with the way their grievance has been dealt with, Spetkomuntrans will invite representatives of the relevant local community / business to participate in the process so that a mutually agreed solution is identified and implemented in a timely manner. At all times, complainants can seek a legal remedy in accordance with the laws and regulations of Ukraine.

## **6.2 CONTRACTORS' HANDLING GRIEVANCES**

- 6.2.1. The grievance form may also be submitted directly to the Contractor(s) during the construction works. The Contractor(s) will forward any received grievances / comments to Spetskomuntrans without delay to allow for processing of the grievance / comments (i.e. record, acknowledge and respond to the grievance in the timeframes defined).
- 6.2.2. The Contractor(s) is obliged to hand out the grievance form and also explain the form to workers with low literacy / concerned citizen(s) and take actions to resolve grievances which relate to their scope of work. Other grievances which are not related to the Contractors' scope will be forwarded to Spetskomuntrans. The complaints procedure and grievance form (Appendix A) will be available at the construction site(s) at all times, whether the construction site is closed or open. The leaflet will be plasticised and hung on the construction information board(s) so as to be publicly available at all times.

## 7 MONITORING, REPORTING AND RESPONSIBILITIES

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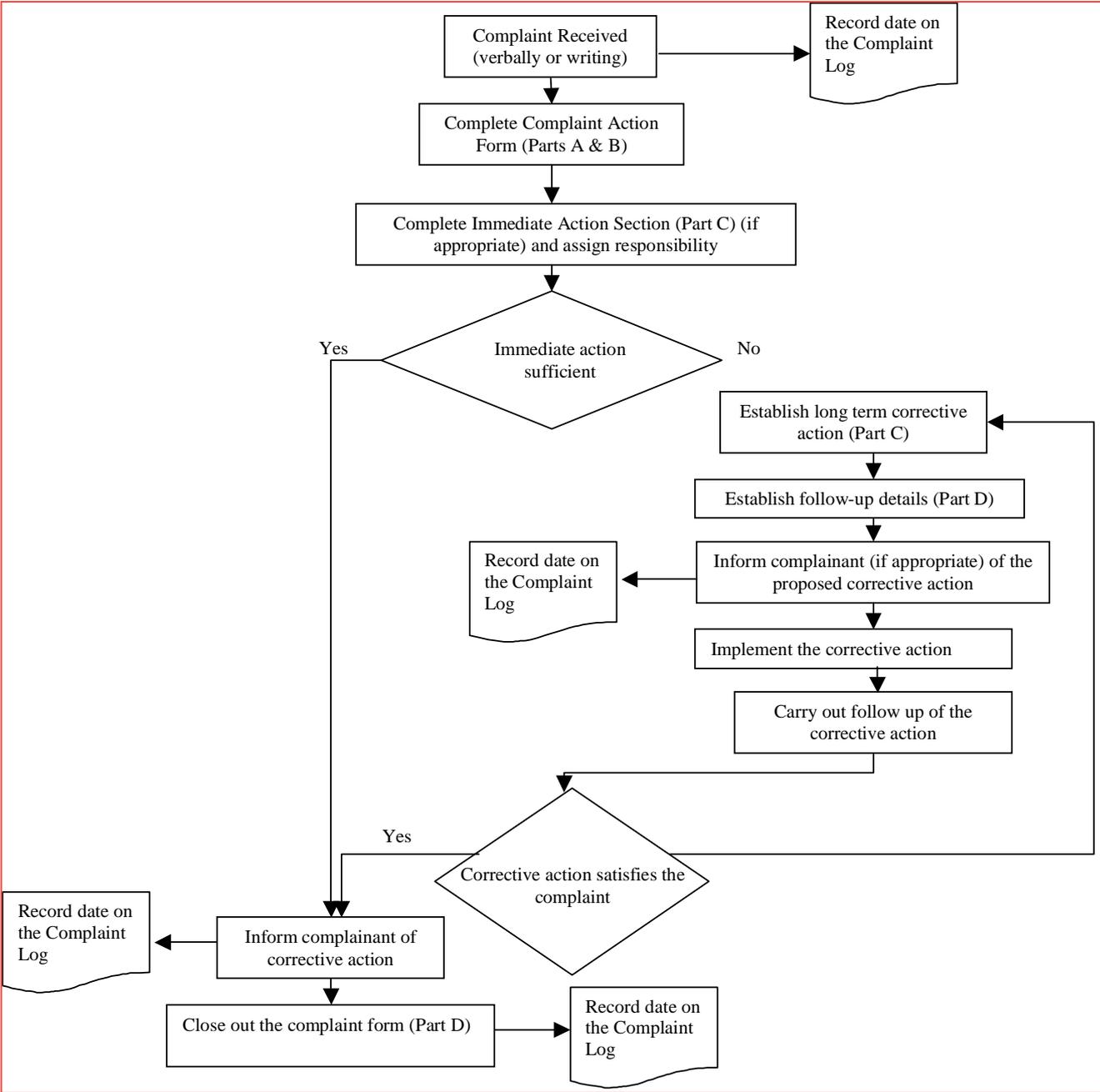
- 7.1.1. Successful stakeholder engagement depends on performance monitoring, analysis and adapting to changed circumstances and stakeholder information needs. The Spetskomuntrans will implement the SEP and will update it regularly during the different stages of the Project. The CLO in collaboration with the PIU is responsible for management and monitoring of the SEP. The PIU will also review the SEP regularly to ensure that all the consultation activities are implemented and are in accordance with the planned schedule.
- 7.1.2. The PIU will produce Annual E&S Reports for submission to key stakeholders. The Annual report will be posted on the City's website.
- 7.1.3. Any verbal or written complaints can be raised using the hotline number as provided on the City website (<http://khm.gov.ua/uk/content/zvernennya-gromadyan>) or via the details provided below:
- Attention: Ms Ksenia Kosiuk
  - Head of Local Population Enquiries Department (Grievance Manager)
  - Postal Address: 29008, 1 Tolstoho Street, City of Khmelnytskyi, Ukraine
  - Telephone +38 097 893 35 16
  - E-mail address: [ksenia.kosyuk@gmail.com](mailto:ksenia.kosyuk@gmail.com)

# Appendix A

COMPLAINTS PROCEDURE AND  
GRIEVANCE FORM



# COMPLAINTS PROCEDURE AND GRIEVANCE FORM



## PUBLIC GRIEVANCE FORM

Reference No:	
Full Name:	
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent.</i>	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information:  Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail: _____
Language: Please mark your preferred language for communication.	<input type="checkbox"/> Ukrainian <input type="checkbox"/> Other (Please specify) _____
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Please return this form to:

- Attention: Ms Ksenia Kosiuk
- Head of Local Population Enquiries Department (Grievance Manager)
- Postal Address: 29008, 1 Tolstoho Street, City of Khmelnytskyi, Ukraine
- Telephone +38 097 893 35 16
- E-mail address: [ksenia.kosyuk@gmail.com](mailto:ksenia.kosyuk@gmail.com)

# Appendix B

## SHORT-TERM STAKEHOLDER ENGAGEMENT PLAN



Spetskomuntrans

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# KHMELNITSKY SOLID WASTE PROJECT

Short-term Stakeholder Engagement Plan



Spetskomuntrans

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# KHMELNITSKY SOLID WASTE PROJECT

## Short-term Stakeholder Engagement Plan

**FINAL PUBLIC**

**PROJECT NO. 70057536**

**OUR REF. NO. 70057536/SHORT-TERM SEP**

**DATE: MAY 2020**

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## INTRODUCTION

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- 1.1.1. This Short-term Stakeholder Engagement Plan (SEP) details the engagement activities which will be undertaken with stakeholders in light of the COVID-19 restrictions during the 120-day disclosure period.
- 1.1.2. This Short-term SEP is supplementary to the SEP (<https://www.ebrd.com/work-with-us/projects/esia/khmelnitsky-solid-waste-project.html>) published prior to the disclosure of the Project. The SEP, rather than this Short-term SEP, will continue to be the document which is revised following Project approval, to inform on-going stakeholder engagement through the various stages of Project development (construction and operation).

## SHORT-TERM STAKEHOLDER ENGAGEMENT PLAN

1.1.3. The table below details the short-term engagement plan for each of the key identified stakeholders.

### Key Identified Stakeholders and Methods of Engagement

Stakeholder (Priority stakeholders noted in <b>bold</b> )	Impact on Stakeholders	Purpose of Engagement	Engagement Methods (during the disclosure period)		Methods (Long Term - Deferred)	Limitations
			Current Restrictions	Amended Restrictions <sup>1</sup>		
<b>Local residents from the villages of Oleshin, Velika Kalinovka, Vydrovi Doly, Ivankivtsi, Cherepova and Cherepivka.</b>	<ul style="list-style-type: none"> <li>These residents will be directly and indirectly affected as part of the Project, where the risks may include nuisances and obstruction of community rights of way mainly during the construction stage of the Project.</li> <li>The Project would benefit this group through creation of direct, indirect and induced employment.</li> </ul>	<ul style="list-style-type: none"> <li>Project information (i.e. scope, programme, nature of works etc.).</li> <li>Project impacts and effects during the construction and operational phase (adverse and beneficial).</li> <li>Mitigation measures to reduce adverse effects.</li> </ul>	<ul style="list-style-type: none"> <li>Disclosure focussing on on-line methods, radio / TV / newspaper announcement (one for each source).</li> <li>Produce a short accessible webinar which is recorded in Ukrainian. The webinar will be promoted and subsequently the recording shared with the local communities via the City's website, the City's twitter / Instagram / Facebook accounts. The Village Head and his representative will also be requested to share the webinar via their social media accounts (where / if available).</li> <li>The webinar will also be broadcast on a local TV channel.</li> <li>Provide questionnaires, which includes a short description of the Project, an accompanying map and further contact details will be issued to each household within the surrounding villages. The questionnaires will be accompanied by a self-addressed and pre-paid envelope which will enable individuals to raise queries. The questionnaires will be deposited directly by the employee of the local post service (2,400 properties). The basis for providing a number of questionnaires to each household is to increase participation (i.e. female representation). Returned questionnaires will be complied by the City.</li> <li>After the questionnaires are returned a short question and answer response will be prepared, if appropriate.</li> </ul>	As per 'Current Restrictions' column but with face to face sessions with booked slots.	<ul style="list-style-type: none"> <li>Further fully advertised presentation prior to construction commencing.</li> <li>For vulnerable groups Spetskomuntrans to facilitate regular focus groups and workshops in order to consult with this group through face to face meetings organised by the Community Liaison Officer.</li> </ul>	<ul style="list-style-type: none"> <li>Short term engagement may not capture vulnerable people holistically.</li> <li>Some individuals may not be able to complete or return the questionnaires.</li> <li>Some individuals may not have internet access.</li> </ul>
<b>Residents / landowners within the existing and new SPZs.</b>						
<b>Residents living along access roads.</b>						
<b>Vulnerable Groups:</b> <ul style="list-style-type: none"> <li>Single women headed households;</li> <li>Households with more than three children; and</li> <li>People with low literacy levels.</li> </ul>	<ul style="list-style-type: none"> <li>This group will be directly and indirectly affected as a result of the Project.</li> <li>Vulnerable groups could be affected as a result of the Project construction and operation activities.</li> </ul>					

<sup>1</sup> This assumes that non-essential travel within the Project area is permitted for residents, but mass gatherings may still be prohibited.

Stakeholder (Priority stakeholders noted in bold)	Impact on Stakeholders	Purpose of Engagement	Engagement Methods (during the disclosure period)		Methods (Long Term - Deferred)	Limitations
			Current Restrictions	Amended Restrictions <sup>1</sup>		
			<p><i>Note: Vulnerable individuals who may not be able to access the webinar will be able to view the local TV broadcast.</i></p>			
<b>Roma waste pickers (vulnerable group).</b>	This group will be directly affected as a result of the Project during construction and operation (employment and accommodation).	<ul style="list-style-type: none"> <li>Project information (i.e. scope, programme, nature of works etc.).</li> <li>Project impacts and effects during the construction and operational phase (adverse and beneficial).</li> <li>Mitigation measures to reduce adverse effects, notably those relating to employment and accommodation.</li> </ul>	<ul style="list-style-type: none"> <li>City of Khmelnytsky will liaise with Roma representative (who is able to speak both Ukrainian and Roma) to discuss the Project by going through the Non-Technical Summary for the Project (<a href="https://www.ebrd.com/work-with-us/projects/esia/khmelnytsky-solid-waste-project.html">https://www.ebrd.com/work-with-us/projects/esia/khmelnytsky-solid-waste-project.html</a>).</li> </ul>	As per 'Current Restrictions' column however the video could be viewed by numerous Roma.	<ul style="list-style-type: none"> <li>Further Roma presentation prior to construction commencing.</li> <li>Engagement as part of the Livelihood Restoration Plan (LRP).</li> <li>Roma to be provided with Alternative employment and accommodation opportunities.</li> <li>Spetskomuntrans to facilitate regular focus groups and workshops in order to consult with this group through face to face meetings organised by the Community Liaison Officer.</li> </ul>	<ul style="list-style-type: none"> <li>Only key individuals' questions may be raised and not all of the Roma's views may be heard.</li> <li>There may be some nervousness in relation to viewing the recorded video.</li> </ul>
<b>Potential landowners in the new Sanitary Protection Zone (SPZ).</b>	<ul style="list-style-type: none"> <li>Land owners (individuals and businesses selling land to Spetskomuntrans).</li> <li>Restrictions on usage of the land owned.</li> </ul>	<ul style="list-style-type: none"> <li>Project information (i.e. scope, programme, nature of works etc.).</li> <li>Potential restrictions on land use.</li> </ul>	<ul style="list-style-type: none"> <li>Directly target landowners registered in the public register for distribution of hard copy Project information (Non-Technical Summary). The addresses will be those registered by the tax administration.</li> <li>Provide a questionnaire, which includes a short description of the Project, an accompanying map and further contact details, will be issued to each landowner within the SPZ (300m for the proposed Mechanical Biological Treatment Facility and 500m for the proposal and existing landfill). The questionnaires will be accompanied by a self-addressed and pre-paid envelope which will enable landowners to raise queries. The questionnaires will be deposited directly by the employee of the local post service.</li> <li>After the questionnaires are returned a short question and answer response will be prepared, if appropriate.</li> </ul>	As per 'Current Restrictions' column but with face to face sessions with booked slots.	<ul style="list-style-type: none"> <li>Engagement as part of the Livelihood Restoration Plan (LRP).</li> </ul>	<ul style="list-style-type: none"> <li>Some landowners may not be able to complete or return the questionnaires.</li> </ul>

Stakeholder (Priority stakeholders noted in bold)	Impact on Stakeholders	Purpose of Engagement	Engagement Methods (during the disclosure period)		Methods (Long Term - Deferred)	Limitations
			Current Restrictions	Amended Restrictions <sup>1</sup>		
			<i>Note: It is possible that some addresses will be missing however most will be captured via the residential route (first row).</i>			
<b>Landowners in the existing SPZ.</b>	See 'Local residents from the villages of Oleshin' and 'Potential landowners in the new Sanitary Protection Zone' (first and fourth rows).					
Residents within the wider Project area (such as the City of Khmelnytsky).	Indirectly affected as part the Project.	Project information (i.e. scope, programme, nature of works etc.).	<ul style="list-style-type: none"> <li>Produce a short accessible webinar which is recorded in Ukrainian. The webinar will be promoted and subsequently the recording shared with the local communities via the City's website, the City's twitter / Instagram / Facebook accounts. Councillors within the Project area will also be requested to share the webinar via their social media accounts (where / if available).</li> <li>The webinar will also be broadcast on a local TV channel.</li> </ul>	As per 'Current Restrictions' column.	Not applicable.	Some individuals may not have internet access.
Non-Governmental Organisations (NGOs).	This group could directly and indirectly influence the Project through consultation with local communities and the facilitation of environmental and social campaigns.				The level of Spetskomuntrans engagement with this group of stakeholders will depend on partnership formed (i.e. for engaging with and supporting Roma waste pickers).	
Khmelnytsky City University and local colleges.	This group will indirectly influence the Project through student research, innovation and training the field of waste management.				Spetskomuntrans to interact with key universities / colleges on research and development and training provision.	
Recycling organisations.	This group will directly influence the Project through the incorporation of stakeholders' input / comments into their practices and activities .	<ul style="list-style-type: none"> <li>Project information (i.e. scope, programme, nature of works etc.).</li> <li>Project impacts and effects during the construction and operational phase (adverse and beneficial), notably associated with working practices.</li> <li>Mitigation measures to reduce adverse effects, notably those relating to employment and accommodation of those working for the recycling organisations.</li> </ul>	<ul style="list-style-type: none"> <li>Directly target the organisations and provide a hard copy Project information, such as the Non-Technical Summary for the Project (<a href="https://www.ebrd.com/work-with-us/projects/esia/khmelnytsky-solid-waste-project.html">https://www.ebrd.com/work-with-us/projects/esia/khmelnytsky-solid-waste-project.html</a>).</li> <li>Engage in email, and where appropriate telephone, dialogue with the organisations.</li> </ul>	As per 'Current Restrictions' column but face to face meetings.	Spetskomuntrans to negotiate contracts which include recycling references / obligations and monitor their implementation.	Not applicable.

