

Approved by: Vladimir Malinov
Executive Director
Bulgartransgaz EAD

**STAKEHOLDER
ENGAGEMENT PLAN**

**WHEN IMPLEMENTING THE
CHIREN UGS CAPACITY EXPANSION PROJECT**

BULGARTRANSGAZ EAD

July 2023



Stakeholder Engagement Plan – Chiren UGS Capacity Expansion Project

1. INTRODUCTION

This Stakeholder Engagement Plan for the Chiren UGS Capacity Expansion Project (the Project) has been developed based on the concept for public participation pursuant to Article 9(3) of Regulation (EU) No 347/2013, in conjunction with the requirements of the IFC Performance Standards on Environmental and Social Sustainability and the Equator Principles (EP4), as well as the requirements of the applicable national legislation.

The International Finance Corporation (IFC) Sustainability Framework and IFC Performance Standards (2012) are applicable to this Project and include the following:

- ✓ Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- ✓ Performance Standard 2: Labor and Working Conditions
- ✓ Performance Standard 3: Resource Efficiency and Pollution Prevention
- ✓ Performance Standard 4: Community Health, Safety, and Security
- ✓ Performance Standard 5: Land Acquisition and Involuntary Resettlement
- ✓ Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ✓ Performance Standard 8: Cultural Heritage

Performance Standard 7: We have scoped out PS7 applicability as Roma are not directly or especially impacted by the Project, although Roma people live in the Project AoI. PS7 may be triggered depending on the impact on Roma communities, lives, languages, habits, and cultures. Having excluded PS7 applicability, we agree they are a marginalized group with restricted ability to profit of Project's opportunities, therefore special attention shall be paid when engaging with them.

Stakeholder engagement is an on-going process throughout the Project cycle and this document will therefore be updated periodically and supplemented in line with the implementation stages of this Project.

Stakeholder engagement is an essential part of the good business practices and corporate social responsibility, as well as a way to improve the quality of projects and implies:

- The provision of reliable public information that is timely, relevant to the public interest, understandable and adequate;
- Bidirectional information exchange;
- Possibility to submit complaints and a regulated procedure for their timely consideration and judgement.

Bulgartransgaz EAD shares the understanding that real public engagement is of fundamental importance for the successful management of risks and impacts on the communities affected by the implementation of projects, as well as for achieving greater benefits for the public.

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2. PROJECT DESCRIPTION AND OBJECTIVES

2.1. Project objective

Chiren UGS Capacity Expansion Project (the Project) covers three aspects:

1. Design, construction and commissioning of new above ground facilities – a compressor station with all of the auxiliary equipment to ensure a reliable and continuous operation for natural gas injection and withdrawal and a new gas metering station (GMS). The new facilities are envisaged to be located in the lands of Chiren village, Vratsa Municipality, Vratsa District, close to the existing facilities of Chiren UGS.;
2. Design, construction and commissioning of a new gas pipeline in the section VA Butan - Chiren UGS. The route of the section from VA Butan to Chiren UGS runs through northern Bulgaria and the territory of Vratsa District.
3. Design, construction and commissioning of underground facilities - ten new high flowrate exploitation and three observation wells, as well as new gatherings (gas pipelines) connecting the exploitation wells with the above ground facilities, including the compressor station. Location of the project component - In northern Bulgaria, Vratsa District - the area of the Chiren structure (concerning the wells and gas gatherings) and the site of CS Chiren on the territory of Chiren UGS (for the individual separation, measurement and telemetry).

Activities Map



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3. IDENTIFYING THE STAKEHOLDERS

The following categories of stakeholders have been identified in relation to the construction and operation of the facilities of the Chiren UGS Expansion Project:

- **Local community: general public, host communities for workers, potential suppliers, road users, worker communities, elderly communities (i.e. pensionaries’ clubs), vulnerable groups.**
- **Owners/lessees/users of land properties**
- **Local authorities**
- **Competent authorities and organisations (control bodies, central government authorities and their agencies/directorates/local units, European institutions, audit bodies)**
- **The operators of transmission systems, network users and users of natural gas in Bulgaria and the entire region**
- **Lenders**
- **Civil society and NGOs**
- **Bulgartransgaz EAD personnel**
- **Providers, contractors and subcontractors and their personnel**

The table below provides a specific list of stakeholders with an indication of which project component they relate to:

Stakeholders category	Name	Project component
EXTERNAL STAKEHOLDERS		
Local community (incl. general public, host communities for workers, potential suppliers, road users, worker communities, elderly communities (i.e. pensionaries’ clubs))	The population of Chiren village, the town of Vratsa	Above ground equipment and wells
Local community (incl. general public, host communities for workers, potential suppliers, road users, worker communities, elderly communities (i.e. pensionaries’ clubs))	The population of Chiren village, the town of Vratsa and Vratsa municipality, Borovan municipality, Hayredin municipality, the town of Mizia and Mizia municipality, the town of Kozloduy and Kozloduy municipality, village of Butan, Borovan municipality, the town of Krivodol and Krivodol municipality	Gas pipeline
Vulnerable groups	Elderly above 65 years of age living alone	All

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	and Roma living in Chiren village, the town of Vratsa and Vratsa municipality, Borovan municipality, Hayredin municipality, the town of Mizia and Mizia municipality, the town of Kozloduy and Kozloduy municipality, village of Butan, Borovan municipality, the town of Krivodol and Krivodol municipality	
Owners/lessees/users of land properties	An accurate identification of all owners and those affected by easements, as well as the lessees and land users is done for the aboveground facilities and the connecting gas pipeline and will be done for the new wells as well as part of the Land Management and Livelihood Restoration Management Plan implementation.	All
Local authorities	Vratsa Municipality, Chiren village	Above ground equipment and wells
Local authorities	Chiren village, Vratsa Municipality, Butan village; Hayredin, Mizia, Kozloduy, Borovan, Krivodol municipalities	Gas pipeline
Competent authorities and organisations (control bodies, central government authorities and their agencies/directorates/local units, European institutions, audit bodies)	- Ministry of Energy: Sofia - Ministry of Regional Development and Public Works: Sofia Ministry of Agriculture: Sofia - Ministry of Environment and Water: Sofia Basin Directorate Danube Region: Pleven. Executive Environment Agency: Sofia	All
The operators of transmission systems, network users and users of natural gas in Bulgaria and the entire region	Neighbouring transmission system operators in Romania, Greece, North Macedonia, Serbia, Türkiye Large commercial/industrial consumers of natural gas Population with gas supply access	All
Lenders	Citibank IFC	All
Civil society and NGOs	Public figures and public organisations National environmental NGOs Local NGOs Branches of international environmental NGOs	All

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INTERNAL STAKEHOLDERS		
Bulgartransgaz EAD personnel	Employees at Sofia Headquarters -260 employees Employees at Chiren UGS - 66 employees.	All
Providers, contractors and subcontractors and their personnel	DZZD TECH ENERGY EXPANSION, including personnel of subcontractors and suppliers	Above-ground part
Providers, contractors and subcontractors and their personnel	DZZD STROYGAZSYSTEM, including personnel of subcontractors and suppliers	Gas pipeline
Providers, contractors and subcontractors and their personnel	DZZD UGS DRILLING CHIREN, including personnel of subcontractors and suppliers	Wells

The following table presents the risks to the identified stakeholder groups. On this basis the Project company can identify what issues need to be addressed in communication with them.

Stakeholders risk matrix of Chiren UGS Capacity Expansion Project			
	Risk	Project phase	Level of risk
Design, construction and commissioning of above ground facilities, new connecting gas pipeline, new operation and exploitation wells	Local community		
	Discrimination	Design and construction/ operation	LOW
	Violation of human rights in the use of armed security	Design and construction/ operation	LOW
	Forced displacement	Design and construction	LOW
	Social services/ deterioration of infrastructure	Construction / operation	LOW
	Health and safety of the local community	Construction / operation	LOW
	Employment/livelihood	Construction / operation	LOW
	Transport/moving heavy machinery and equipment	Construction	LOW
	Vulnerable groups		
	Discrimination (particularly Roma)	Design and construction/ operation	MODERATE
Violation of human rights in the use of armed security	Design and construction/ operation	LOW	

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	Forced displacement	Design and construction	LOW
	Social services/ deterioration of infrastructure	Construction / operation	LOW
	Health and safety	Construction / operation	LOW
	Employment/livelihood	Construction / operation	LOW
	Transport/moving heavy machinery and equipment	Construction	LOW
Owners/lessees/users of land properties			
	Forced land acquisition	Design and construction	LOW
	Fair compensation for lost profit/damaged land/crops not provided	Design and construction	LOW
	Affected lands not restored to previous condition	Construction	LOW
Local authorities			
	Social services/ deterioration of infrastructure	Construction / operation	LOW
	Health and safety of the local community	Construction / operation	LOW
	Transport/moving heavy machinery and equipment/deterioration of roads	Construction	MODERATE
Civil society and NGOs			
	Project non-compliant with environmental protection regulations	Design and construction/ operation	LOW
	Project to impose social risks, particularly to vulnerable groups	Design and construction/ operation	LOW
Competent authorities and organisations (control bodies, central government authorities and their agencies/directorates/local units, European institutions, audit bodies)			
	Project non-compliant with the applicable statutory and regulatory requirements and other voluntarily applied principles	Design and construction/ operation	LOW
The operators of transmission systems, network users and users of natural gas in Bulgaria and the entire region			
	Security of gas supply	Design and construction/ operation	LOW

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	Access to natural gas as energy resource	Design and construction/ operation	LOW
Lenders			
	The Project does not comply with the PS 1-6 and 8 and other voluntarily applied principles	Design/ Construction/ Operation	MODERATE
Internal stakeholders			
	Working conditions (working hours and breaks, etc.)	Design and construction/ operation	MODERATE
	Forced labour	Design and construction/ operation	LOW
	Child labour	Design and construction/ operation	LOW
	Joining trade unions, collective bargaining	Design and construction/ operation	LOW
	Risks related to OHS	Design and construction/ operation	MODERATE
	Accommodation conditions for workers from outside the area	Construction	LOW
	Installation// transport/ moving heavy machinery and equipment	Construction	MODERATE

4. PRINCIPLES FOR THE ENGAGEMENT OF STAKEHOLDERS AND PUBLICATION OF INFORMATION

Stakeholder engagement is based on principles and values of openness and transparency that are key to successful relationships and interaction with them:

- All stakeholders have the right to receive timely, understandable and adequate **public information about the Project**;
- All stakeholders can use the grievance mechanism **and can be assured that their complaints will be addressed and resolved in a timely manner**;
- Regular **updating of this Stakeholder Engagement Plan** ensures that these principles are maintained throughout the different stages of the Project implementation.
- **Transparency and openness to dialogue** – open and active relationships with stakeholders exist when all issues raised by any stakeholder are dealt with quickly, transparently and efficiently.
- **Commitment and Responsibility** – the Company makes every effort to build and maintain constructive and sustainable relationships with all stakeholders. The company also takes all measures to monitor and mitigate the possible risks and impacts of the Project.
- **Respect** – the rights, cultural beliefs, values and interests of all stakeholders are taken into account;
- **Inclusion** – broad participation is encouraged and supported through fit-for-purpose means to include all ways of communication which are used by the different stakeholders;

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- **Trust** – through an open and constructive dialogue that demonstrates respect for the beliefs of all stakeholders.

The public consultations give the Company the opportunity to gain clarity about the attitude and expectations of the people towards the Project.

5. PUBLIC PARTICIPATION AND CONSULTATIONS HELD

Separate consultations with the affected parties have been conducted for each component of the Project. Bulgarian legislation provides for opportunities at various stages of the project development for broad participation of the public, NGOs, and all stakeholders. It should be noted that a number of national and international NGOs (their branches) are active in the country in the field of environmental protection and biodiversity. Local NGOs are also present as identified in the SIA.

The local community is also generally active in major infrastructure projects close to their residence, which in this case is not valid up-to-date although BTG has taken all efforts to encourage the local community to express their concerns and raise questions about the project. In general there are positive expectations among the local people that the project will bring some jobs/business opportunities in the area and no particular concern, objections were raised during the communication process so far. In the future stakeholder engagement, the Project company would reevaluate the consultation approach and strategy used so far and will try to achieve more proactive stakeholder engagement.

The consultation process is at different stages depending on the progress of the individual project components. For Project components: Expansion of the Chiren UGS capacity - above ground part and a gas pipeline connecting the Chiren UGS to the existing gas transmission network of Bulgartransgaz EAD in the area of Butan village, consultations and other awareness raising and communication activities with the affected parties have been carried out on numerous occasions - both in the process of environmental procedures and in the process of elaboration of the DSP-Parcelling Plan and detailed spatial plan.

For Project component: Design, construction and commissioning of new exploitation and observation wells to date there have been activities carried out under this Plan at the time of the Investment Intention Notice sent to the MoEW, and as this procedure progresses this Plan will be updated with the activities carried out.

The following pages provide a detailed summary of the awareness raising and stakeholder engagement activities carried out to date.

➤ **Expansion of Chiren UGS capacity - above-ground part**

- An Investment Proposal Notice for the project was submitted to the Ministry of Environment and Water (MoEW) on 5 February 2021. The notice was published on the website of Bulgartransgaz EAD <https://bulgartransgaz.bg/news/proektirane-i-izgrazhdane-na-novi-nadzemni-saorazheniya-pgh-chiren-640.html> and the MoEW website - <https://www.moew.government.bg/bg/proektirane-i-izgrajdane-na-novi-nadzemni-suorujeniya-kompresorna-stanciya-s-vsichkite-prilejasti-tehnicieski-suorujeniya-za-obezpechavane-nadejdna-i-neprekusnata-rabota-v-rejimi-nagnetyavane-i-dobiv-na-gaz-kakto-i-nova--10391/>, in order to inform the affected population. A notice was published in a local newspaper Severozapad Dnes (“Northwest Today”).
- MoEW response including the establishment of the applicable procedure under the Environmental Protection Act (EPA) is published on the Ministry's website:

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<https://www.moew.government.bg/bg/otgovor-na-uvdomlenie-za-ip-proektirane-i-izgrajdane-na-novi-nadzemni-suorujeniya-kompresorna-stanciya-s-vsichkite-prilejasti-tehnicheski-suorujeniya-za-obezpechavane-nadejdna-i-neprekusnata-rabota-v-rejimi-nagnetyavane-10515/> In the course of preparing the terms of reference (ToR) for the scope and content of the EIA report in the period from 16 September 2021 to 11 October 2022, in compliance with the EPA, consultations were held with the MoEW, Regional Inspectorate for Environment and Water (RIEW) Vratsa, Basin Directorate Danube Region (BDDR), Executive Environmental Agency (ExEA), Ministry of Health, Ministry of Energy, Municipality of Vratsa and Town Council of Chiren village..

- Environmental Impact Assessment Report (EIA Report) was submitted to MoEW on 21 January 2021 requesting the issuance of an Environmental Impact Assessment (EIA) Decision and the issuance of a Complex Permit (CP), according to an opinion received from the Competent Environmental Authority. In the course of the EIA procedure, consultations on the scope and content of the EIA were held with MoEW, RIEW Vratsa, BDDR, ExEA, Ministry of Energy, Municipality of Vratsa, Town Council of Chiren village, Ministry of Health, Town Council of Chiren village, Ministry of Health. A positive assessment of the EIA Report quality was received on 13 July 2022.
- The EIA Report has been published on the MoEW website for public consultation on the investment proposal at: <https://www.moew.government.bg/bg/doklad-za-ovos-za-investicionno-predlojenie-proektirane-i-izgrajdane-na-novi-nadzemni-suorujeniya-kompresorna-stanciya-s-vsichkite-prilejasti-tehnicheski-suorujeniya-za-obezpechavane-nadejdna-i-neprekusnata-rabota-v-reji-13271/>. It has been also published on Bulgartransgaz EAD website at: <https://www.bulgartransgaz.bg/news/doklad-za-otsenka-na-vazdeystvioto-varhu-okolnata-sreda-za-investitsionno-predlozhenie-proektirane-i-izgrahdane-na-novi-nadzemni-saorazheniya-kompresorna-stantsiya-s-vsichkite-y-prilezhashti-tehnicheski-saorazheniya-za-obezpechavane-nadezhdna-i-neprekasn-717.html> and the Municipality Vratsa website at: <https://www.vratza.bg/bg/1657886273.html>. A notice was also published in the national daily newspaper 24 Chasa (“24 Hours”) about the forthcoming public consultation on the EIA Report. Notices have been posted in the Chiren village town hall and Vratsa Municipality.
- A public discussion on the EIA Report was held on the territory of Vratsa Municipality on 19 August 2022, and no questions or objections were raised to the report during the discussion, as evidenced by the Minutes. A public discussion of the EIA report was also held on 19 August 2022 on the territory of Chiren village and no questions or objections were raised to the report during the discussion, as evidenced by the Minutes .
- Order of the Minister of Environment and Water dated 6 October 2022, schedules a meeting of the High Expert Environmental Council (HEEC) to the MoEW for 14 October 2022 for EIA Report review.
- EIA Decision No. 2-2/2022 of the Minister of Environment and Water was issued on 4 November 2022, including a Complex Permit No. 611-H0/2022 and updated Safety Report. It has been published on the MoEW website at: <https://www.moew.government.bg/bg/reshenie-po-ocenka-na-vuzdejstvioto-varhu-okolnata-sreda-ovos-2-2-2022-g-za-investicionno-predlojenie-za-proektirane-i-izgrajdane-na-novi-nadzemni-suorujeniya-kompresorna-stanciya-s-vsichkite-prilejasti-tehnicheski-suoru-13897/>. A notice of the decision has been published in the national daily newspaper 24 Chasa on 8 November 2022. The decision was published in order to further inform the public about the investment proposal. Within the 14-day statutory period for objections and proposal on the decision, none were submitted and the

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decision has entered into force as of 23 November 2023, according to a MoEW letter Ref. No. OBOC-17/29.11.2022.

- Decision No. K33-20 of 5 December 2022 of the Agricultural Land Commission of the Ministry of Agriculture approved the design sites and routes. The decision has been published on the Ministry's website <https://www.mzh.government.bg/bg/uslugi/komisiya-za-zemedelskite-zemi/resheniya-komisiyata-zemedelskite-zemi/> No objections have been submitted within the 14-day statutory period and the decision has entered into force .
- The ToR for the development of a Detailed Spatial Plan - Parcelling Plan and Detailed Spatial Plan - Construction Plan and Order No. ПД-02-15-118/16.12.2021 of the Deputy Minister of Regional Development and Public Works authorizing the development of the Detailed Spatial Plan - Construction Plan (DSP-CP) and Detailed Spatial Plan - Parcelling Plan(DSP-PP) for site: Expansion of Chiren UGS capacity - above-ground part on the territory of the lands of Chiren village, Vratsa Municipality, Vratsa Region have been published on the website of the Ministry of Regional Development and Public Works in the public register under Article 3, para. 4 of the Spatial Development Act (SDA) of the issued acts for the development of spatial plans and their amendments, serial number 15 - <https://www.mrrb.bg/bg/publicchen-registur-po-chl-3-al-4-ot-zut-na-izdadenite-aktove-za-izrabotvane-na-ustrojstveni-planove-i-na-tehnite-izmeneniya-prez-2021-g/> and have been published on the official website of Vratsa Municipality in accordance with Article 124b, para.2 and para. 3 of SDA. A notice has been also placed on the information board of Vratsa Municipality and the Town Hall of Chiren village and with letter Ref. No. 2600-3167/1/02.12.2022. the Municipality of Vratsa informed that no objections have been submitted.
- The elaborated draft DSP has been promulgated in State Gazette issue 12 of 11 February 2022 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=168777>, and no objections or proposals on the draft have been submitted within the statutory period of one month - Protocol of findings and an official note from Vratsa Municipality.
- The elaborated draft of a Detailed Spatial Plan - Parcelling Plan (DSP-PP) and a Detailed Spatial Plan – Construction Plan (DSP-CP) for site: “Expansion of Chiren UGS capacity - above-ground part” was approved by the National Expert Board on Spatial Development and Regional Policy at the Ministry of Regional Development and Public Works at a meeting held on 22 December 2022 in accordance with Order of 2 December 2022 of the Minister of Regional Development and Public Works, which was attended by representatives of the competent state control bodies, affected operating companies and the Municipality of Vratsa.
- Order No. ПД-02-15-144/22.12.2022 of the Minister of Regional Development and Public Works was issued for the approval of the DSP for the site, which is published on the website of the Ministry in the public register under Article 3, para 4 of the SDA of the issued acts for approval of spatial plans serial number 18 - <https://www.mrrb.bg/bg/publicchen-registur-po-chl-3-al-4-ot-zut-na-izdadenite-aktove-za-odobryavane-na-ustrojstveni-planove-i-na-tehnite-izmeneniya-prez-2022-g/>. It was promulgated in the State Gazette No. 104 of 30 December 2022 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=182400>. We have been informed by letter of the Ministry of Regional Development and Public Works No. AY-14-2 dated 17 January 2023 that no objections have been submitted to the notice and the order entered into force on 14 January 2023.
- An investment design has been prepared - detailed design phase, coordinated with all concerned operating companies and administrations.

As indicated above, at the stage of conducting the environmental procedure and at the stage of approval of the draft Detailed Spatial Plan, a series of announcements of the Investment Proposal were made to the affected population.

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➤ **Gas pipeline connecting Chiren UGS to the existing gas transmission network of Bulgartransgaz EAD in the area of Butan village**

In the period 2010 - 2015 Bulgartransgaz EAD had awarded activities on studies and investment design and search for archaeological sites at the site “High-Pressure Gas Transmission Pipelines with AGRS from Chiren UGS to the towns of Kozloduy and Oryahovo in view of expanding the existing gas transmission network, owned by Bulgartransgaz EAD and supplying natural gas to customers in the region of the towns of Kozloduy and Oryahovo. A transmission gas pipeline has thus been designed DN350 (14” -Ø355.6) starting from the town of Chiren to the town of Kozloduy with a length of approximately 46 km. Procedures under the Environmental Protection Act (EPA) and the Biological Diversity Act (BDA) have been carried out in the above-mentioned period, a Detailed Spatial Plan - Parcelling Plan (DSP-PP) - Final Design Phase has been developed and approved by Order No. ПД-02-15-51/01.04.2015 of the Minister of Regional Development and Public Works, which has entered into force. A Decision No. BP-29-ПР/2011 assessing the need of carrying out an Environmental Impact Assessment has been issued for the site. The information and public consultation activities envisaged are carried out in the framework of these procedures

Circumstances requiring a temporary suspension of the project have been identified following the entry into force of the DSP-PP Order for the site in 2015. Opinion No. OBOC-EO-313/19.08.2022 of the Director of RIEW Vratsa states that Decision No. BP-29-ПР/2011 assessing the need of EIA for the site has lost its legal effect.

The amendment of the DSP-PP approved under Order No. ПД-02-15-51/01.04.2015 of the Minister of Regional Development and Public Works for the site High-Pressure Gas Transmission Pipelines with AGRS from Chiren UGS to the towns of Kozloduy and Oryahovo aims at DSP-PP being updated for using it for the site: **Gas pipeline connecting Chiren UGS to the existing gas transmission network of Bulgartransgaz EAD in the area of Butan village**. The new design route of the gas pipeline to Chiren UGS follows the route according to the approved DSP-PP from the hot tapping to the existing gas transmission pipeline DN1200 at Butan village within the established easement at the connection point until reaching the area of Chiren UGS, and the easement being increases on both sides compared to the approved DSP (15 m wide strips on both sides of the axis of the new gas pipeline).

- Order No. ПД-02-15-8/17.01.2023 of the Deputy Minister of Regional Development and Public Works authorizes the development of a draft amending the DSP-PP for the site: High-Pressure Gas Transmission Pipelines with AGRS from UGS Chiren to the town of Kozloduy and Oryahovo and a power supply plan of LVA Manastirishte for using it for site: Gas pipeline connecting Chiren UGS to the existing gas transmission network of Bulgartransgaz EAD in the area of Butan village. Order No. ПД-02-15-12/01.02.2023 instructs to correct an obvious factual error in the spelling of the of the site’s name. The orders and the assignment for the development of the draft amendment to DSP-PP are published on the MRDPW website in the public register under Article 3 para.4 of the SDA of the acts issued for the development of spatial plans and their amendments, serial numbers 3 and 4 <https://www.mrrb.bg/bg/publicen-registur-po-chl-3-al-4-ot-zut-na-izdadenite-aktove-za-izrabotvane-na-ustrojstveni-planove-i-na-tehnite-izmeneniya-prez-2023-g/>.
- The assignment for the development of the DSP and the Orders have been published on the official websites of all municipalities through the territory of which the gas pipeline passes, in accordance with Article 3 of the SDA:

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- ✓ Kozloduy Municipality
 - ✓ Mizia Municipality – <https://www.obshtinamizia.com/2023/02/09/%d0%be-%d0%b1-%d1%8f-%d0%b2-%d0%bb-%d0%b5-%d0%bd-%d0%b8-%d0%b5-2/>
 - ✓ Hayredin Municipality – <https://www.hayredin.com/news/16758348083100/proekt-za-izmenenie-na-pup-pp-za-obekt-prenosimi-gazoprovodi-s-visoko-nalyagane-s-agrs-ot-pgh-chiren-do-gr-kozloduy-i-gr-oryahov>
 - ✓ Borovan Municipality – <https://borovan.bg/news/16757757227389/popravka-na-ochevidna-fakticheska-greshka-v-zapoved-na-zamestnik-ministar-na-mrrb-polya-zaneva-dimitrova>
 - ✓ Krivodol Municipality – <https://www.krivodol.com/bg/obyavlenie-po-chl124b-al2-ot-zut/>
 - ✓ Vratsa Municipality – <https://www.vratza.bg/files/559b722330b98b85bed7b7558d100b85.pdf>
- On the basis of the announcements made, the municipalities informed us by letters and Protocols of findings that no objections had been received to the orders authorising the development of DSP.
 - The developed draft amendment of the DSP-PP was announced in the State Gazette in order to inform the affected population and the public with publications, as follows:
 - Kozloduy Municipality – issue 18 of 24 February 2023 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=187027>;
 - Mizia Municipality - issue 23 of 14 March 2023 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=188020>
 - Hayredin Municipality – issue 23 of 14 March 2023 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=187966>;
 - Borovan Municipality – issue 22 of 10 March 2023 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=187592> ;
 - Vratsa Municipality – issue 19 of 28 February 2023 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=187392> ;
 - Krivodol Municipality – issue 18 of 24 February 2023 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=187184>.
 - After the deadline for submitting objections and proposal on the draft, the municipalities inform us whether any objections have been received. Letters and protocols have been received from all municipalities along the pipeline route - Vratsa, Krivodol, Kozloduy, Hayredin and Borovan - stating that no objections to the plan have been received.
 - The draft amendment of the DSP is in the process of coordination; pending is only the completion of the procedure for approval of the sites by the Agricultural Land Commission to the Ministry of Agriculture for which an application was submitted on 27 April 2023. In the period 15 May - 19 May 2023 the draft amendment of the DSP is to be submitted to the MRDPW for review by the National Expert Board on Spatial Development and Regional Policy (NEXSDRP) at the MRDPW and its approval.
 - An Investment Proposal Notice for the gas pipeline was submitted to the MoEW on 12 August 2022. The notice has been published on MoEW website at: <https://www.moew.government.bg/bg/gazoprovod-svurzvast-pgh-chiren-sus-sustestvuvastata-gazoprenosna-mreja-na-bulgartransgaz-ead-v-rajona-na-s-butan/>. At the same time the notice

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was published on Bulgartransgaz EAD website – <https://bulgartransgaz.bg/news/o-b-ya-v-a-do-zainteresovanite-litsa-i-obshtestvenost-720.html>. A notice was published in a local newspaper Severozapad Dnes (“Northwest Today”) issue dated 12 August 2022.

- By letter Ref. No. OBOC – 43/04.01.2023 г. (our Ref БТГ 04-09-137 (1) of 9 January 2023) MoEW establishes the applicable procedure under the Environmental Protection Act (EPA), and the response has been published on the Ministry's website: <https://www.moew.government.bg/bg/otgovor-na-uvdomlenie-za-investicionno-predlojenie-gazoprovod-svurzvast-pgh-chiren-sus-sustestvuvastata-gazoprenosna-mreja-na-bulgartransgaz-ead-v-rajona-na-s-butan-s-vuzlojitel-bulgartransgaz-ead/>
- After establishing the applicable procedure under the EPA by the MoEW, Bulgartransgaz EAD submitted a request for assessing the need for EIA and information under Annex 2 of the EPA for assessing the need for EIA (letter No. OBOC-43/26.01.2023). The information has been published on the MoEW website for public access at: <https://www.moew.government.bg/bg/gazoprovod-svurzvast-pgh-chiren-sus-sustestvuvastata-gazoprenosna-mreja-na-bulgartransgaz-ead-v-rajona-na-s-butan-14332/>. Information has also been sent to all affected municipalities and town halls for posting of notices. Chapter IV of Decision No. 2-IIP/2023 of the MoEW, which determines that no EIA shall be carried out for the Investment Proposal, indicates that the MoEW has received letters from the affected municipalities and town halls stating that the investment proposal has been communicated to the affected population for a period of at least 14 days and that no objections or proposals have been received regarding it.

All affected municipalities have published the Information on assessing the need to carry out an EIA on their websites as follows:

- Kozloduy Municipality – <https://kozloduy.bg/wps/portal/municipality-kozloduy/municipality/marketing/investment.opportunities>
- Mizia Municipality - <https://www.obshtinamizia.com/2023/02/08/%d1%81%d1%8a%d0%be%d0%b1%d1%89%d0%b5%d0%bd%d0%b8%d0%b5-%d0%b3%d0%b0%d0%b7%d0%be%d0%bf%d1%80%d0%be%d0%b2%d0%be%d0%b4-%d0%b1%d1%83%d0%bb%d0%b3%d0%b0%d1%80%d1%82%d1%80%d0%b0%d0%bd%d1%81%d0%b3%d0%b0/>
- Hayredin Municipality - <https://www.hayredin.com/news/16758430073038/iskane-ot-pretsenyavane-izvarshvaneto-na-ovos-za-investitsionno-predlozhenie-gazoprovod-svarzvasht-pgh-chiren-sas-sashtestvuvash>
- Borovan Municipality - <https://www.borovan.bg/news/16757762616551/saobshtenie-dozhitelite-na-obshtina-borovan-kmetstvo-malorad>
- Krivodol Municipality - <https://www.krivodol.com/bg/ovos-bulgartransgaz-ead/>
- Vratsa Municipality - <https://www.vratza.bg/bg/1675684572.html>
- Decision No. 2-IIP/2023 was issued on 26 April 2023 by the Minister of Environment and Water for assessing the need of EIA for the investment proposal with the opinion not to carry out EIA. The decision was published on MoEW website - <https://www.moew.government.bg/bg/reshenie-2-pr-2023-g-za-investicionno-predlojenie-gazoprovod-svurzvast-pgh-chiren-sus-sustestvuvastata-gazoprenosna-mreja-na-bulgartransgaz-ead-v-rajona-na-s-butan/>
- Decision No. 80/02.05.2023 of the Minister of Environment and Water granted preliminary implementation of Decision No. 2-IIP/2023 of the Minister of the Environment and Water for assessing the need for EIA. The decision was published on MoEW website - <https://www.moew.government.bg/bg/reshenie-80-02-05-2023-g-na-ministura-na-okolnata-sreda-i-vodite-za-dopuskane-na-predvaritelno-izpulnenie-na-reshenie-2-pr-2023-g-na->

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[ministura-na-okolnata-sreda-i-vodite-za-precenyavane-na-neobhodimostta-ot-izvurshvane-n-14852/](https://www.moew.government.bg/bg/proektirane-izgrajdane-i-vuvejdane-v-eksploataciya-na-podzemni-suorujeniya-deset-novi-eksploacionni-i-tri-novi-nablyudatelni-sondaji-novi-shlejfi-i-dovejdsti-putista-svurzani-s-razshirenje-na-podzemnoto-gazohraniliste-14924/)

As indicated above, at the stage of conducting the environmental procedure and at the stage of approval of the draft Detailed Spatial Plan, a series of announcements of the Investment Proposal were made to the affected population.

➤ **Design, construction and commissioning of new exploitation and observation wells**

- An Investment Proposal Notice for the wells was submitted to the MoEW on 10 May 2023. The notice has been published on MoEW website at: <https://www.moew.government.bg/bg/proektirane-izgrajdane-i-vuvejdane-v-eksploataciya-na-podzemni-suorujeniya-deset-novi-eksploacionni-i-tri-novi-nablyudatelni-sondaji-novi-shlejfi-i-dovejdsti-putista-svurzani-s-razshirenje-na-podzemnoto-gazohraniliste-14924/> At the same time the notice was published on the website of Bulgartransgaz EAD - <https://bulgartransgaz.bg/news/o-b-ya-v-a-do-zainteresovanite-lica-i-obshtestvenost-770.html> - A notice was published in the newspaper “24 Chasa” (“24 Hours”) dated 10 May 2023.

By letter Ref. No. OBOC-33/05.06.2023 (our Ref БТГ 04-09-80(4)/05.06.2023) MoEW establishes the applicable procedure under the Environmental Protection Act (EPA), and the response has been published on the Ministry's website: <https://www.moew.government.bg/bg/otgovor-na-uvedomlenie-za-investicionno-predlojenie-proektirane-izgrajdane-i-vuvejdane-v-eksploataciya-na-podzemni-suorujeniya-deset-novi-eksploacionni-i-tri-nablyudatelni-sondaji-novi-shlejfi-i-dovejdsti-putista-svur-15030/>

In this case the stakeholder engagement up-to-date has shown very little or no interest among the stakeholders in the Project although BTG has taken all efforts to encourage them and especially local community to express their concerns and raise questions about the project. In general there are positive expectations among the local people that the project will bring some jobs/business opportunities in the area and no particular concern, objections were raised during the communication process so far. In the future stakeholder engagement, the Project company would reevaluate the consultation approach and strategy used so far and will try to achieve more proactive stakeholder engagement with special attention given to vulnerable groups.

6. GRIEVANCE MECHANISM

This mechanism is part of Bulgartransgaz EAD commitment to ensure transparency and accountability of its activities. It is fully consistent with the internal rules of the company, the current legislation in the country, as well as Standard 1 of the International Finance Corporation (PS-1). It ensures that all grievances received will be addressed in a timely manner and resolved, whenever possible, in the best way for all parties concerned.

6.1. Who can use the grievance mechanism

In accordance with PS-1, without impeding the access to judicial or administrative remedies, the grievance mechanism is intended for grievances and feedback under the Project from:

- the affected public;

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- Bulgartransgaz EAD employees and workers under the Project (Bulgartransgaz EAD personnel, personnel of contractors, subcontractors and suppliers);
- other Project Stakeholders.

In connection with the Project, anonymously submitted grievances shall also be accepted, registered and considered.

The affected public and other Project stakeholders are notified and familiarized with the possibility of filing grievances under this mechanism through the current Stakeholder Engagement Plan, published on the website of Bulgartransgaz EAD and communicated to the stakeholders during consultations. There is a grievance box at the entrance of UGS Chiren and grievance forms are made available there to all parties wishing to file one. The local Mayor's office in Chiren has informed the population for the opportunity to raise grievances and in the town hall of Chiren also has installed a grievance box and provides for opportunity to file a grievance directly there.

In addition, the workers and employees of Bulgartransgaz EAD, contractors, subcontractors and suppliers under the Project become familiar with the possibility to submit complaints under this mechanism by receiving information from the relevant Employer.

6.2 Ways of filing grievances

Grievances related to the Project can be filed through:

- **Standard grievances form**, Appendix 1, attached to this Plan and published on Bulgartransgaz EAD website: *Business development/Projects of common interest (PCIs)/ 6.20.2 Chiren UGS Expansion – completed and sent to the email info@bulgartransgaz.bg* .
- **An electronic message in free text sent to email info@bulgartransgaz.bg**
- **A letter in free text or by using the grievance form, placed in a mailbox located at the entrance of Chiren UGS;**
- **The local authorities in the respective settlements.**

6.3 Registration of any complaints received

All grievances will be placed in Bulgartransgaz EAD Registry system and tracked in a special register of grievances under the Project, Appendix 2 to this Plan. Within 5 days of receiving the grievance, Bulgartransgaz EAD official contacts the complainant and confirms its receipt.

6.4 Consideration, undertaking actions and response to grievances received

Any comments brought to the attention of the Company verbally or in writing (by post or online) or by filling in a grievance form (Appendix 1) will be taken in consideration.

In line with PS-1 a grievance assessment procedure is carried out. The company will make all reasonable efforts to address the issue raised in the grievance.

Grievances received electronically at info@bulgartransgaz.bg or at Chiren UGS (in a mailbox or through the local government bodies), will be registered in Bulgartransgaz EAD Registry system and will be brought to the attention of the Executive Director. The Executive Director appoints a person responsible for the particular grievance.

- Confirms receipt of the grievance to the complainant within 5 days of its receipt;

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- Performs at first screening of the grievance and assesses the departments/expert level to be involved in its consideration and possible solving; Performs a grievance assessment by analysing the circumstances of the submitted grievance and prepares a report to the management of the company, with a proposal to take timely corrective measures.
- If the Company is not able to address the issues raised in a time fashion way through immediate corrective actions, a long-term corrective actions will be identified.
- Following a decision of the management, a response will be sent to the complainant sent within a deadline no more than 30 days as of its filing, containing the proposed solution (containing information on the corrective actions based on the assessment of the raised issue.
- If the issue cannot be addressed through the grievance mechanism or if actions are not required, the Company will provide a detailed explanation, including justification on why the grievance was rejected. The complainant is notified of other ways to resolve the issue, if any.

7. STAKEHOLDERS COMMUNICATION PLAN

In the course of the project Bulgartransgaz EAD shall carry out the communication process in the following ways:

- company's website;
- information boards placed at visible places at the respective municipalities;
- newspapers (local and/or national);
- direct letters to interested stakeholders/ representatives of certain stakeholder groups (i.e. Roma mediator, local social NGO representatives, authorities, infrastructure operators, etc.)
- Meetings with Local Communities that will be documented in Minutes of meeting, Appendix 3. Meetings will be held in a location which is convenient for the local community to attend (i.e. the local town hall), as often as required by national legislation or before any important step in the project implementation is going to happen which would have impacts on the respective community. The invitations are to be sent via the channels described in the previous bullets.
- Meetings and written communication with contractors, subcontractors and suppliers.

In addition to the already implemented consultation and information exchange, the Company should verify, through direct consultation with the local community and relevant stakeholder representatives, which groups are potentially affected by which impact(s) and confirm mitigation measures that are to be applied during the works by Contractors, subcontractors and suppliers (e.g. access to the construction site, night time shifts, etc.).

The Contractors, subcontractors and suppliers shall inform beforehand (in writing or orally) the affected people (people living or businesses operating in vicinity to the construction site) by providing information on works timeline, planned activities, potential nuisance (access and dust) and availability of the public grievance procedure.

The Social Impact Assessment for the Project has identified two vulnerable groups: people aged above 65 years of age living alone and Roma. The project will not lead to the risk of vulnerable groups falling into greater poverty, especially as it is expected to create additional employment.

This Communication Plan is a summary of all the interests/needs of the stakeholders under the Project, as well as the methods of communication with them.

Interested party	Stakeholder interests/ needs	Methods of communication	Phase of project implementation
EXTERNAL STAKEHOLDERS			
Local community	<ul style="list-style-type: none"> • Awareness of the risks of an accident 	<ul style="list-style-type: none"> • Information related to the Emergency plan 	Design, construction

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	<p>with hazardous chemical substances and limiting its consequences</p> <ul style="list-style-type: none"> • Awareness to possible increases in traffic/ dust/ noise and movement of heavy machinery in the area; • Awareness of possible temporary closures of roads during construction; • Need of jobs opportunities; • Awareness of business opportunities and possibility to host workers in local places for accommodation; 	<p>of Chiren UGS and notification schemes</p> <ul style="list-style-type: none"> • Local system for disclosure of Chiren UGS • Enabling raising alerts and proposals electronically (through a special section on the company's website and on paper through a mailbox in Chiren UGS and on-site at the municipal administration of the village of Chiren) • Communication via meetings, local town halls, electronic media; • Awareness of the possibilities for filing a grievance; • Communication and implementation of the Traffic Management Plan. 	and operation
Vulnerable groups (elderly above 65 years of age living alone and Roma)	<ul style="list-style-type: none"> • Awareness of the risks of an accident with hazardous chemical substances and limiting its consequences • Awareness to possible increases in traffic/ dust/ noise and movement of heavy machinery in the area; • Awareness of possible temporary closures of roads during construction; • Awareness of jobs opportunities; • Awareness of business opportunities and possibility to host workers in local places for accommodation; 	<ul style="list-style-type: none"> • In addition to the communication to the local community a Roma mediator will be involved to facilitate the communication to them; • Communication materials with visuals and easy text to comprehend will be hanged in each village's town hall. 	Design, construction and operation
Owners/lessees/users of land properties	<ul style="list-style-type: none"> • Restoration and reclamation of affected areas • Fair compensation for use/damage 	<ul style="list-style-type: none"> • Written correspondence • Enabling raising alerts and proposals electronically (through a special 	Design and construction

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	suffered/crop lost	section on the company's website and on paper through a mailbox in Chiren UGS)	
Local authorities -	<ul style="list-style-type: none"> • Awareness of the risks of an accident with hazardous chemical substances and limiting its consequences • Mediation in the implementation of the grievance mechanism 	<ul style="list-style-type: none"> • Emergency plan of Chiren UGS and notification schemes • Local system for disclosure of Chiren UGS • Grievances 	Design, construction and operation
Competent authorities and organizations	<ul style="list-style-type: none"> • Compliance with the applicable statutory and regulatory requirements and other voluntarily applied principles; • Execution and successful implementation of the project according to the imposed requirements; <p>Public interest, awareness and participation in the project implementation process</p>	<ul style="list-style-type: none"> • Provision of documented information about the actions performed, reports, analyses, references, internal regulatory documents 	Design, construction and operation
Transmission system operators, network users and natural gas consumers in Bulgaria and the entire region	<ul style="list-style-type: none"> • Security of natural gas supplies • Economic benefit from project implementation • Access to energy resources (natural gas) 	<ul style="list-style-type: none"> • Consultations • Publishing information on the website of analyses, reports and business plans • Enabling raising alerts and proposals electronically (through a special section on the company's website and on paper through a mailbox in Chiren UGS) 	Design, construction and operation
Lenders	<ul style="list-style-type: none"> • Compliance with the applicable statutory and regulatory requirements and other voluntarily applied principles; • Execution and successful implementation of the project according to the imposed 	<ul style="list-style-type: none"> • Provision of documented information about the actions performed, reports, analyses, references, internal regulatory documents 	Design, construction

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	<p>requirements;</p> <ul style="list-style-type: none"> • Public interest, awareness and participation in the project implementation process 		
Civil society and NGOs	<ul style="list-style-type: none"> • Compliance with the applicable environmental legislation; • Quality implementation and successful implementation of the project; • Public interest, awareness and participation in environmental impact assessment consultations; • Awareness of the risks of an accident with hazardous chemical substances and limiting its consequences • Awareness of job opportunities to local community and vulnerable groups 	<ul style="list-style-type: none"> • Publication of information on the website and in local daily newspapers, as well as in other publicly accessible places • Public consultations • Publication of annual environmental reports by the competent authority • Information related to the Emergency plan of Chiren UGS and notification schemes • Awareness of the possibilities for filing a grievance • Communication of available jobs by the Project company and its' contractors 	Design, construction and operation
INTERNAL STAKEHOLDERS			
Bulgartransgaz EAD personnel	<ul style="list-style-type: none"> • Safe working conditions and compliance with ethical norms • Compliance with the applicable environmental legislation • Good working environment, including professional development, remuneration, recreation • Stability of the Company and security in the long term - successful project implementation 	<ul style="list-style-type: none"> • Risk assessment • Internal communication • Information boards • Boxes for proposals related to Occupational H&S • Personnel Qualification and Retraining Programme; • Meetings of trade unions, WCC/WCG; • Collective labor agreement; • Business plan; • Awareness of the possibilities for filing a grievance; • others. 	Design, construction and operation

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Suppliers, contractors and subcontractors and their personnel	<ul style="list-style-type: none"> • Safe working conditions and compliance with ethical norms • Compliance with the applicable environmental legislation • Quality implementation and successful implementation of the project 	<ul style="list-style-type: none"> • Risk assessment and other measures under Occupational health and safety agreement • Declaration by suppliers and contractors on compliance with obligations related to taxes and insurance, environmental protection, employment protection and working conditions in force in the Republic of Bulgaria • Periodic reports on compliance with the conditions in the issued environmental impact assessment decisions and mandatory monitoring of individual environmental components • Periodic reports on project progress; • Reports of performed current, periodic and inspection controls by the contracting authority • Second-party audit reports of the contracting authority • Awareness of the possibilities for filing a grievance 	Design and construction
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8. ROLES AND RESPONSIBILITIES

The roles and responsibilities for implementing this Stakeholder Engagement Plan and activating the grievance mechanism are shown in the following organizational scheme:

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- **The roles and responsibilities linked with the overall implementation of this Plan are, as follows:**
 - Management Board: Approval of the Stakeholder Engagement Plan;
 - Executive Director: approval of the Stakeholder Engagement Plan and control over its implementation;
 - Head of Key Projects for Expansion and Interconnection Department – implementation of the activities from the design and construction phases of the Stakeholder Engagement Plan;
 - Director General Directorate General Technical Operations – implementation of the activities from the design, construction and operation phases of the Stakeholder Engagement Plan;
 - Head of Chiren UGS – implementation of the activities from the design, construction and operation phases of the Stakeholder Engagement Plan.

- **The roles and responsibilities related to the information exchange under this Plan, including the grievances mechanism:**
 - Executive Director: official correspondence under the Project, including correspondence on grievances; resolutions to grievances; overall process control;
 - Head of Chiren UGS: official correspondence under the Project; registration of grievances in Bulgartransgaz EAD Registry system, received at Chiren UGS (mailbox or through the local authorities); publications on the information boards in accessible places in the respective municipalities; meetings with representatives of local authorities, as well as with contractors, subcontractors and suppliers;
 - Head of Key Projects for Expansion and Interconnection Department: publications on the company's website and in newspapers; meetings with representatives of local authorities, as well as with contractors, subcontractors and suppliers;
 - Director, General Directorate Technical Operations: meetings with representatives of local authorities, as well as with contractors, subcontractors and suppliers.

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9. MONITORING AND ACCOUNTABILITY

BTG will follow an effective and permanent regime of monitoring and accountability of the activities of communication with the affected parties and follow-up of submitted grievances, which will ensure compliance of the project throughout its implementation and operation with the interests of all affected parties and with the requirements of the lenders (Performance Standards and the EP) and the national legislation.

The activities indicated in the current plan are monitored thank to the preparation of a monthly Report on the implementation of the activities under the Stakeholder Engagement Plan under the Expansion of Chiren UGS capacity project in the form of Appendix 4.

Appendix 1: Grievance Form

Appendix 2: Grievances Register

Appendix 3: Minutes of a Meeting

Appendix 4: Report on the Implementation of the Activities under the Stakeholder Engagement Plan