

**Roads Department of the Ministry of
Infrastructure of Georgia**



STAKEHOLDER ENGAGEMENT PLAN

FOR

**Trans-Caspian Corridor –
Georgia Accessibility and Transport Enhancement Project
(TC GATE)**

FINANCED BY THE WORLD BANK

Draft

Date: January 2025

CONTENTS

ACRONYMS

1.0	INTRODUCTION / PROJECT DESCRIPTION	4
1.1	Introduction	4
1.2	Project Overview	5
1.3	Purpose and objectives of SEP	7
2.0	REGULATIONS AND REQUIREMENTS	9
2.1	Georgian Requirements	9
2.2	World Bank Requirements	10
3.0	BRIEF SUMMARY OF PREVIOUS AND UPCOMING STAKEHOLDER ENGAGEMENT ACTIVITIES	11
3.1	Community meetings for SEP preparation	12
3.2	Informal communication with government agencies	13
3.3	Communication with non-governmental active in the project area	13
3.4	Lessons learned from previous projects	14
3.5	Project-affected parties (PAPs)	15
3.6	Other interested parties (OIPs)	16
3.7	Disadvantaged / Vulnerable individuals or groups	17
3.8	Summary of stakeholder interest in and influence over the project	18
4.0	STAKEHOLDER ENGAGEMENT PROGRAM	20
4.1	Detail on engagement methods to be used	26
4.2	Proposed strategy to incorporate the view of vulnerable groups	27
4.3	Information disclosure	27
5.0	ROLES, RESPONSIBILITIES AND RESOURCES FOR STAKEHOLDER ENGAGEMENT	29
5.1	Implementation Arrangements	29
5.2	Roles and Responsibilities	29
5.3	Estimated Budget	30
6.0	GRIEVANCE REDRESS MECHANISM (GRM)	32
6.1	Grievance Process	32
6.2	Workers' Grievance Mechanism	37
6.3	RD Contact Information	41

7.0	MONITORING AND REPORTING	42
7.1	Monitoring reports during construction	42
7.2	Monitoring reports during operation.....	43
7.3	Involvement of stakeholders in monitoring activities	44
7.4	Reporting back to stakeholder groups.....	44
8.0	REFERENCES	45
	ANNEX 3. PUBLIC GRIEVANCE LEAFLET.....	47

Acronyms

Acronym	Description
AH	Affected Household
AP	Affected Person
CSC	Construction Supervision Consultant
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standard
GATE	Georgia Accessibility and Transport Enhancement Project
GBV	Gender Based Violence
GRC	Grievance Resolution Committee
GRCP	Georgia Regional Connectivity Project
GRM	Grievance Redress Mechanism
HH	Household
IDP	Internally Displaced People
KM	Kilometre
LRP	Livelihood Restoration Plan
MEPA	Ministry of Environmental Protection and Agriculture
NGO	Non-Governmental Organization
OIP	Other Interested Parties
PAPs	Project-Affected Parties
RAP	Resettlement Action Plan
RD	Roads Department of Georgia
ROW	Right of Way
SEP	Stakeholder Engagement Plan
TOR	Terms of Reference
WB	World Bank

1.0 Introduction / Project Description

1.1 Introduction

This document presents the Stakeholder Engagement Plan (SEP), which has been prepared and will be implemented by the Roads Department of Georgia (RD), in preparation for the Trans-Caspian Corridor - Georgia Accessibility and Transport Enhancement Project (TC GATE, or “the Project”) which includes the modernization and construction of three main sections: Badiauri–Bakurtsikhe (Approx. Length Lot 4 - 21.76 km and Lot 5 - 9.12 km) and Gurjaani (Chumlaki)-Telavi (Approx. length is 36.6 km). The overall length is approximately 68 km.

Tbilisi-Sagarejo-Bakurtsikhe is part of the International Tbilisi-Bakurtsikhe-Lagodekhi-Azerbaijan Border (S5) road, which starts at the eastern part of the Sagarejo and ends near Lagodekhi, at the existing Border crossing point to Azerbaijan. This section of the route crosses territories of the Sagarejo and Gurjaani municipalities.

Construction Lot 4 of wider Tbilisi – Bakurtsikhe motorway, extended from the end of Badiauri to Chalaubani. More precisely, the construction lot starts immediately after the end of Badiauri (53+800) and ends in Chalaubani after the designed interchange (Chainage 75+100). The total length of the Construction lot is 21.76 km and it crosses the main settlements of Mzisdguli, Shibliani, Kachreti, Naniani, Arashenda, Melaani and Chalaubani.

Construction Lot 5 of wider Tbilisi – Bakurtsikhe motorway, extended from the eastern to Chalaubani until the eastern part of Bakurtsikhe. More precisely, the construction lot starts immediately after the Chalaubani Interchange (Chainage 75+100) and ends after Bakurtsikhe (Chainage 84+420). The total length of the Construction lot is 9,12km and it is a new connection between Chalaubani and Bakurtsikhe.

Gurjaani (Chumlakhi) - Telavi road section is further north-west of Bakurtsikhe - Tsnori section on the same corridor. The road section connects two cities of Kakheti region - Telavi and Gurjaani and runs through 20 villages. The new bypass design of Section 2 Gurjaani (Chumlakhi) – Telavi is 36.6 km long and will detour from the roundabout at Telavi outskirts avoiding densely populated villages and run through non-agricultural land parcels attached with structures used for commercial activity, and arable agricultural land parcels belonging to local households and wineries.

This SEP outlines the approach, methods, and responsibilities for engaging with project stakeholders throughout the project life cycle. It describes stakeholder engagement activities conducted to date and sets out the planned strategy for ongoing consultation and engagement. The SEP also defines the process for information disclosure and grievance management to ensure that Affected People (APs) and other interested parties are informed and consulted with on issues that could potentially affect them.

1.2 Project Overview

1.2.1 Type of Project impacts

According to the Resettlement Action Plans (RAPs) prepared for the three project sections, approximately 373 households (HHs) (1,496 PAPs) owned 670 land plots under the impact of Lot 4 RAP; 95 HHs (373 PAPs) owned 159 land plots under the impact of Lot 5 RAP and 640 HHs (1,345 PAPs) owned 1,035 land plots under the impact of Gurjaani (Chumlaki)-Telavi RAP¹ will be affected, resulting in physical displacement and economic displacement, as defined under the Environmental and Social Standard (ESS) 5. Total number of HHs under the impact of three RAPs are:

1. According to the census and inventory data of losses for Lot 4 initial RAP, new road section will affect 670 land plots with total area of 1,442,057 sqm. From the mentioned 670 plots, 28 plots (65,267 sqm) are in state ownership, 15 plots are municipal (72,608 sqm), 3 plots are owned by the state company JSC GSE. 18 plots (90,861 sqm) belong to the company JS Georgian Railway. 329 land plots (791,743 sqm) are registered in private ownership, 268 plots (374,628 sqm) are legalizable.
2. According to the census and inventory data of losses for Lot 5 initial RAP, new road section will affect 159 land plots with total area of 76,013 sqm. From the mentioned 159 plots, 9 plots (3,079 sqm) are in state ownership (only 1 plot of 10sqm is illegitimately used by 1 private user) and 1 (1927sqm) belong to the State-owned company JS Georgian Railway. 66 land plots (47,096sqm) are registered in private ownership, 48 plots (23,911sqm) are legalizable.
3. According to the RAP initially prepared for Gurjaani (Chumlaki)-Telavi section, the right of way (ROW) will impact the total of 193 State-owned land parcels with a total area of ROW 257,984 sqm.; and 1,035 private land parcels with the total of 1,290,681 sqm. to be permanently acquired. Total land plots under the impact are 1198.

Map 1: Municipalities and villages within the project area of influence



¹ RAPs for Lot 4 and Lot 5, as well as RAP for Gurjaani (Chumlaki)-Telavi road section are under the update, therefore the presented data is subject for update too.

A field study was conducted to assess the number of roadside vendors operating along Lots 3, 4, and 5, including the Barjiskhevi area. For Lot 3, the field study started on August 15, 2025, and completed on October 13, 2025; the survey for Lot 4 and Lot 5 was started on September 23, 2025, and finalized on October 24, 2025. A total of 189 vendors were identified. Based on the findings, the proposed marketplace in Badiauri (Lot 3) is planned to provide 200 trading spaces to accommodate affected vendors from all three lots. A fully equipped marketplace will be established and handed over to the local municipality for further management and operation. In addition, to support an inclusive and transparent allocation process, the municipality will be provided with a list of vendors, disaggregated by gender and type of trading activity such as bread and cheese sellers; churchkhela, seasonal fruits and meat traders. Based on this information, the municipality will allocate trading spaces accordingly. The preferences of vendors to continue their existing trading activities at the new location will be fully considered. Public consultations will be organized to introduce the model and operational arrangements of the new marketplace, and the views of the affected population will be gathered and duly considered.

Area	Number of vendors	Female	Male
Lot 4 and Lot 5	57	19	35
Lot 3	132	47 ²	88
Barjisxevi marketplace (which is located within Lot 4)	31	Inc. in Lot 4 and 5 figures	Inc. in Lot 4 and 5 figures
Total	189	66	123

The marketplace is expected to attract micro-entrepreneurs and traders located in vulnerable areas along the existing S5 road, exposed to road safety, general safety, climate, and commercial risks. Traders from nearby villages in search of increased business and employment opportunities are also expected to be attracted to this marketplace.

This project will also provide tailored business advice to at least 50 local women to start and/or expand their micro businesses at the premises of the new marketplace, as well as at other locations in the project-targeted areas. This effort will further contribute towards improving opportunities for female traders to expand their businesses and increase job opportunities. The Terms of Reference (TOR) for training was developed in Summer 2025, and the training will be conducted in Winter 2026 by the Engineer of Lot 3, IRD.

1.2.2 Summary of potential environmental and social impacts

Potential environmental and social impacts of the project, as identified in the RAP, Environmental and Social Impact Assessment (ESIA), and socio-economic study, which may need to be paid particular attention to as part of the stakeholder engagement activities, include:

- **Permanent as well as temporary direct and indirect impacts on land use, road vendors and vineyards and gardens**, as well as temporary restrictions on access to land.
- **Erosion and topsoil loss** due to land clearing and vegetation removal and/or excavation, impacts on soil due to blasting, machinery operations, opening borrow pits, quarries or other excavations and earth works.

² Three roadside trading facilities are jointly operated by a woman and a man.

- Potential impacts on **air quality** due to movement of vehicles and equipment, earthworks, open piles of topsoil and spoil, and the using of quarries.
- **Social impact:** impact on local infrastructure and agriculture, as well as temporary impact of access roads.
- **Noise, dust, waste generation and traffic disturbance** from construction vehicles and machinery, as well as earth works.
- **Biodiversity impacts** as the project entails risks to birds, including migrant birds and mammals
- **Visual -landscape changes** due to temporary objects (camps), movement of machinery.
- **Physical or economic displacement** due to the acquisition by RD of houses, property, and land in the ROW; as well as possible damage to crops, grapes, perennials, fences **and related compensation**
- **Generation of local income** through the recruitment of workers from local communities to the project.
- **Occupational and public health, safety and security aspects** during the construction and operation phases, the risks of impact on personnel health and safety may be associated mainly with predictable and unforeseen cases, such as:
 - Deterioration of the air quality in the working zone and increased noise levels as a result of faulty equipment and appliances;
 - Risk of poisoning with drinking water or food;
 - Occupational injury (fractures, electrical injury, etc.).

1.3 Purpose and objectives of SEP

The purpose of the present SEP is to explain how stakeholder engagement will be practised throughout the Project and which methods will be used as part of the process, and to outline the responsibilities of RD, contractors, and other actors in implementing stakeholder engagement activities.

In line with World Bank's Environmental and Social Framework (ESF), the broader objectives of the information disclosure and stakeholder engagement activities presented in SEP is to:

- Establish a systematic approach to stakeholder engagement and build a constructive relationship with all project-affected parties, specifically targeting traditionally vulnerable and disadvantaged groups.
- Assess the level of stakeholder interest and support for the Project and enable stakeholders' views to be considered in project design and environmental and social performance, especially from potentially disadvantaged and vulnerable groups.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project cycle on issues that could potentially affect them as well as expand project benefits to all targeted beneficiaries including ones that may be traditionally vulnerable, disadvantaged, disproportionately affected or excluded from partaking in benefits from local development projects.
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.

This SEP intends to activate the engagement of stakeholders on time during project preparation and implementation. Specifically, SEP serves the following purposes: (a). stakeholder identification and analysis; (b). planning engagement modalities and practical communication tools for consultations and disclosure; (c). defining role and responsibilities of different actors in implementing the SEP; (d). defining the Project's Grievance Mechanism (GRM); (e). providing feedback to stakeholders; and (f). monitoring and reporting on the SEP.

The Project is expected to cause physical resettlement of 29 HHs according to three initial RAPs and economical displacement of 35 acting and 2 non-acting businesses, as well as agricultural land plots owned by around 1000 HHs. The involvement of local population and other stakeholders is essential to the Project's success to ensure smooth collaboration between project staff and local communities and to mitigate environmental and social risks.

2.0 Regulations and requirements

2.1 Georgian Requirements

2.1.1 Constitution of Georgia

“The Constitution of Georgia was adopted in 1995. Although it does not directly address environmental matters, it establishes the legal framework that guarantees environmental protection and public access to information with regard to environmental conditions” (SLR Consulting, 2018: 5).

Article 37(3) provides that *“any person has the right to live in a healthy environment, use the natural and cultural environment. Any person is obliged to take care of the natural and cultural environment.”* Article 37(5) states that *“an individual has the right to obtain full, unbiased and timely information regarding his working and living environment.”*

Article 41(1) states that *“a citizen of Georgia is entitled to access information on such citizen as well as official documents available in State Institutions provided it does not contain confidential information of state, professional or commercial importance, in accordance with the applicable legal rules.”*

2.1.2 Public Consultation in the EIA Process

“In April 2000, Georgia ratified the Aarhus convention. This UNECE (United Nations Economic Commission for Europe) convention facilitates and regulates information availability, public involvement in decision making and access to justice for the field of environmental protection. It implements the principle of the need for involvement of all interested parties in order to enable environmentally responsible development.

The Georgian legislation requires public consultation only for those projects which require Environmental Impact Assessment (EIA). These requirements were recently updated and are set out in the Code of Environmental Assessment (2017). This provides detailed requirements and procedures for conducting public consultations and established timeframes for information disclosure and discussion. The responsibility for the public disclosure now rests with the Ministry of Environment Protection and Agriculture (MEPA), such that the following is required:

- The Scoping Report – a preliminary document prepared by the developer, which sets out the type of information to be gathered and examined during ESIA, is made available by the Ministry on its official website as well as on the notice board of the relevant local authorities and/or representative bodies and upon request, provides hard or soft copies. The public has a right to provide its opinions and comments regarding the Scoping Report to the Ministry within fifteen days of publication. In addition, the Ministry is required to organize a public hearing no earlier than 10th working day and no later than 15th working day after the publication of scoping application. This is chaired and protocolled by the representative of the Ministry and is held in the closest appropriate administrative building to the site of the project or within its vicinity. Any person has a right to participate in it.
- The EIA Report - the Ministry must place the submitted application and attached documents on its official website as well as on the notice board of the relevant local authorities and/or representative bodies and upon request, provide paper copies. The public has a right to submit their opinions and comments to the Ministry regarding the EIA Report, proposed development and conditions of the Environmental Decision, within forty days after the publication of the application. In addition, the Ministry is required to organize a public hearing no earlier than 25th working day and no later than 30th working day after the publication of the application. This is chaired and protocolled by the representative of the Ministry and is held in the closest appropriate administrative building to the site of the project or within its vicinity. Any person has a right to participate in it.

- Environmental Decision - the public must be informed about the decision and be able to access it. Any representative of the public has the right to appeal the decision if it is considered that the public authority in the decision-making process violated the requirements of the legislation” (SLR Consulting, 2018: 5).

2.2 World Bank Requirements

The World Bank’s ESF’s Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice” (World Bank, 2018). Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

A SEP proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Borrower will provide stakeholders with access to the following information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design: (a) the purpose, nature and scale of the project; (b) the duration of proposed project activities; (c) potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures taken to avoid and minimize these; (d) the proposed stakeholder engagement process highlighting the ways in which stakeholders can participate; (e) the time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and (f) the process and means by which grievances can be raised and will be addressed. The information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially

or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility).

3.0 Summary of previous and upcoming stakeholder engagement activities

RD has been engaging with various project stakeholders since the initial stage of projects preparation, namely from beginning of 2018, which coincided with the ESIA process for the (Tbilisi-Bakurtsikhe (Sagarejo-Bakurtikhe Eastern) Part of the International Tbilisi-Bakurtsikhe-Lagodekhi-Azerbaijan Border (S5) Road (Construction Lot 4 and Lot 5) and Gurjaani (Chumlaki) - Telavi) roads. The ESIA for Tbilisi -Sagarejo- Bakurtsikhe project was carried out by Eco-Spectri Consulting Ltd.

The Feasibility studies, engineering design, social and environmental studies for the Gurjaani (Chumlaki)-Telavi) road construction were carried out on the proceeds of the World Bank-supported Third Secondary and Local Roads Project (SLRP III).

Georgian versions of the documents were submitted for review and consultation to MEPA under the Environmental Assessment Code of Georgia. Consistent with the Georgian EA Code the document submitted for government review and public hearing has been titled “EIA”. Four main types of stakeholder engagement activities have taken place to date and are planned to be conducted:

- The initial draft of ESIA report for the Gurjaani (Chumlaki) - Telavi) road was submitted to the MEPA on 28 December 2017. The RD held public consultation meetings with local population in Telavi and Gurjaani municipalities on 21 February 2018.
- Scoping and ESIA (EIA) for Tbilisi-Bakurtsikhe road - public consultations and initial informal meetings (January 2020 and June 2021);
- Community meetings for SEP preparation and finalisation will be conducted in January/February 2026
- Informal communication with government agencies (throughout 2025-26)
- RD Social team meeting during the updated RAPs preparation and disclosure (November 2025 – till February of 2026)
- Updated RAP, SEP, and Labor Management Procedures Public Consultation meetings (February 2026)
- Updated ESIA for Tbilisi-Bakurtsikhe Public Consultation meeting: March 2026

Table 1: Summary of consultations conducted/will be by RD in the frames of ESIA/RAPs update

Stakeholders	Purpose	Method
Project affected persons (PAPs) and their community	To inform the APs, get their views on likely impacts, eligibility and entitlements, procedures for compensation, relocation, rehabilitation and additional assistance for vulnerable HHs	Individual meetings with all affected HHs, (including HHs with vulnerable family members) during the implementation of the socio-economic survey
Other devisions of Roads Department (RDMOI) including its Resettlement Unit	To receive information on government policy, guidelines priorities on the project, and seek work advice.	Frequent individual meetings with the officials of RDMOI

Stakeholders	Purpose	Method
Local Government at Municipality/village Level	To seek cooperation perspectives for implementing the impact assessment survey; To work out solutions for possible issues related to the missing plots (legalizable owners)	Individual meetings with the officials of respective villages and discussions
RD including Environmental, registration and Resettlement Units	Review of information obtained during the plan updates and development and discussion of mitigation and/or compensation approaches.	Individual meetings with the team members

3.1 Community meetings for SEP preparation

At the initial stage of project preparation, meaningful consultations were conducted with PAPs, including vulnerable households, through individual meetings held during the implementation of the initial socio-economic survey (see Table 1) for RAPs preparation. These engagements enabled two-way information exchange and provided opportunities for stakeholders to express their views on anticipated impacts, eligibility and entitlements, compensation and relocation procedures, livelihood restoration measures, and additional assistance needs.

Feedback received through these consultations was reviewed and directly informed the identification of stakeholder groups, the selection of engagement methods appropriate to different stakeholder categories, and the prioritization of key issues reflected in the SEP.

In parallel, consultations with local government representatives and relevant RD divisions, including the Resettlement, Environmental, and Registration Units, as outlined in Table 1, supported coordination on implementation arrangements and informed mitigation and compensation approaches incorporated into the SEP.

Accordingly, the SEP reflects/will reflect the outcomes of past/ongoing and meaningful stakeholder engagement and is a document which incorporates stakeholder inputs and is adopted to the local context.

Following preparation of the draft SEP, the document was reviewed and approved by the World Bank, RD, and local government representatives. Subsequently, RD will commence meaningful consultations through individual and small-group meetings in villages within the Project Area of Influence along the project routes. The initial consultation was held at Gurjaani City Hall on 24 October 2025, and consultations will continue throughout the pre-construction and construction phases. In line with ESS10 requirements, RD representatives will also organize targeted and inclusive consultations to identify and address the needs and concerns of disadvantaged or vulnerable groups.

The RD plans to organize several small-group meetings prior to the start of construction. To date, the main topic of the community meetings has been to share information, communicate with the local population and identify their needs and interests and information gaps.

- To have a designated point of contact in the communities and the local government (The designated contact persons in the local government are the representatives of Mayor of city Gurjaani, Telavi and villages: Chumlaki, Bakurtsikhe, Melaani, Chalaubani etc.).
- Identify the most critical stakeholder activities, e.g., define essential and nonessential activities.

- To develop and adopt multiple channels for communication and grievance mechanism, e.g., informational leaflets, informational boards in the mayors' offices or community houses (where usually locals might gather often) etc., to provide specific information; online communication channels, e.g., Facebook page; messenger, text message etc.
- Develop safe engagement outreach strategies for vulnerable groups who might be in-home isolation or gender roles may limit participation

3.2 Informal communication with government agencies

Starting from October 2025, RD and the consultant responsible for the RAPs update had a meeting representative from all relevant government agencies. The meeting objectives were to introduce the participants to the details of the upcoming project and identify preferred mechanisms for communication (and coordination, as and when needed).

In November 2025, RD and Contractor representatives conducted small group meeting in the Gurjaani municipality affected by the project. RD representatives explained the scope of the project, the definition of the ROW, general principles of RAP compensations packages, as well as the health, environmental and social impacts of Highway construction.

3.3 Communication with non-governmental active in the project area

RD has initiated the process of mapping local stakeholders and stakeholder representative organizations such as Non-Government Organizations (NGOs), local business organisations (for example wine, cheese producers, with which the area is famous) who have been active in project-affected area. The process of stakeholder identification continued throughout the project preparation and will be continuously updated in the course of implementation. During the initial public consultations held October 24, 2025, was announced that local NGOs are invited for further discussions and consultations on SEP, as well as the specific SEP activities listed in this Plan. The main focus of such engagement is to collect feedback from these NGOs and organisations on the proposed project, to assess their interest and eagerness to collaborate with RD, for example in raising public awareness about project or specific aspects of the project, Gender Based Violence (GBV) issues and support RD in possible projects for PAPs in the Project affected area.

RD has identified a preliminary list of NGOs and other community organizations. The preliminary list is presented below, but the number of NGOs/organisations can be changed/increased.

Currently active NGOs in Gurjaani/Telavi municipality are listed in Table 3 below.

Table 3: The list of regionally active NGOs

Name of Organisation	Scope of Activity (ESS10-aligned)
Regional Center for Sustainable Development	Support to civil society for sustainable development and economic empowerment of vulnerable and marginalized populations; implementation of community-based programs that enhance social inclusion, youth engagement, and economic opportunities; facilitation of civic engagement and community participation in local development processes. (based on general NGO development role and sustainability focus)
Kakheti Media Center	Promotion of civic participation and public awareness through independent media and information dissemination; facilitation of informed community engagement; capacity-

	building for socially excluded and marginalized groups, including rural producers and women; support for targeted outreach, awareness raising, and stakeholder dialogue.
Telavi Education, Development and Employment Center	Implementation of capacity building, vocational training, and employment support programs; enhancement of access to educational, social and economic services for vulnerable groups, including persons with disabilities; collaboration with civil society and government actors to strengthen social policies and opportunities for employment and inclusion
Kakheti Regional Development Center	Community development and capacity building for children, youth and families; support for early childhood education and child protection; facilitation of social inclusion, economic empowerment and skills development; engagement with vulnerable populations and local stakeholders to promote inclusive local development.

RD will continue to collect the information regarding the local organizations and contact them for potential future collaboration.

3.4 Lessons learned from previous projects

Several key lessons were learned from the previous experience of the Kakheti Connectivity Improvement Project (KCIP), this section is currently on-going and financed by the World Bank loan. During the implementation of the project, it became apparent that some part of the population had concerns about the indirect social impact, namely loss of access to vineyards. Furthermore, the tractor turning area between the vineyards and the internal access road was assessed as insufficient; therefore, the Roads Department widened the turning strip from 5 m to 8 m. A roadside vendors survey was conducted for all 3 lots and the special livelihood restoration measures will be developed, such as:

1. Establishment of Market area for 200 vendors;
For residential relocates:
Legal/administrative support
 - Transportation support
 - Guidance on housing markets
 - Vocational training
2. For agricultural land owners/illegal users:
 - Provide knowledge and skills on the enterprise management
 - Legal/administrative support (land, assets registration/legalization)
 - Provide information and trainings in tourism development and hospitality
 - Provide information and trainings in agricultural development in the agricultural sectors typical of this region such as: vine cultivation and orchard management; integrated pest management measures, including protection against the brown marmorated stink bug and other harmful insects; establishment and maintenance of almond, strawberry and peach and plantations.
3. For vulnerable groups:
 - Transportation support (especially for persons with disabilities)
 - Vocational training
 - Provide information how to refer to government/NGO services for vulnerable groups
 - Tailored grievance support

RD will incorporate several lessons learned and experience from the past and ongoing project in the new project. RD plans to continue conducting meaningful consultations, which will include:

- (i) early, continuous, and inclusive engagement with stakeholders throughout the project life cycle, starting from planning and continuing through pre-construction and construction phases;
- (ii) timely disclosure of relevant project information in a manner and language that are understandable and accessible to all stakeholders, including project-affected parties;
- (iii) application of engagement methods tailored to stakeholder needs, ensuring culturally appropriate, gender-sensitive, and accessible consultations, including for persons with disabilities, elderly people, and ethnic minorities;
- (iv) targeted consultations with disadvantaged or vulnerable groups to understand their specific needs, concerns, and priorities and to enable their effective participation;
- (v) use of diverse consultation formats, including individual meetings, small-group discussions, and public meetings, to ensure broad and meaningful participation;
- (vi) documentation and disclosure of consultation outcomes, including how stakeholder feedback has been considered and incorporated into project design and implementation; and
- (vii) integration of stakeholder engagement activities with the project Grievance Redress Mechanism (GRM) to ensure that concerns and complaints are systematically recorded, tracked, and addressed.

Also, additional measures will include:

- (i) appoint manager(s) for dedicated project in order to ensure the direct communication between population, contractor and supervision teams, also internally in RD, across the different divisions; (ii) increase engagement of stakeholders, especially project-affected parties, through a range of activities, which are listed in this SEP; (iii) conduct more awareness raising sessions through small meetings on a range of environmental and social issues; and (iv) strengthen and expand the existing project GRM to communities and construction company, by focusing on improved tracking and coordination of submitted grievances and creating a consolidated electronical database of grievances.

3.5 Project-affected parties

For the purpose of the SEP, the term “**project-affected parties**” includes “those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities” (World Bank, 2018b). They are the individuals or households most likely to observe changes from environmental and social impacts of the project.

3.5.1 People affected by land acquisition

In the framework of the current project, a key category of PAPs is going to be people losing assets and/or private land, house, business and/or access to common resources due to project’s land requirements.

According to the initial census and inventory data of losses, mentioned road section will affect 1,108 HHs:

1. According to the census and inventory data of losses for Lot 4 initial RAP, new road section will affect 670 land plots with total area of 1,442,057 sqm. From the mentioned 670 plots, 28 plots (65,267 sqm) are in state ownership, 15 plots are municipal (72,608 sqm), 3 plots are owned by the state company JSC GSE. 18 plots (90,861 sqm) belong to the company JS Georgian Railway. 329 land plots (791,743 sqm) are registered in private ownership, 268 plots (374,628 sqm) are legalizable.
According to the census and inventory data of losses for Lot 5 initial RAP, new road section will affect 159 land plots with total area of 76,013 sqm. From the mentioned 159 plots, 9 plots (3,079 sqm) are in state ownership (only 1 plot of 10sqm is illegitimately used by 1 private user) and 1 (1927sqm) belong to the State-owned company JS Georgian Railway. 66 land plots (47,096sqm) are registered in private ownership, 48 plots (23,911sqm) are legalizable.
2. According to the RAP initially prepared for Gurjaani (Chumlaki)-Telavi section, the ROW will impact the total of 193 State-owned land parcels with a total area of ROW 257,984 sq. m.; and 1,035 private land parcels with the total of 1,290,681 sq.m. to be permanently acquired.

People will be paid for land as required by Georgian law and World Bank requirements. People owning or using land in the ROW will thus be a high-priority stakeholder group which will require active and regular engagement as well as the provision of accurate information, in particular around compensation and livelihood restoration schemes.

3.5.2 People residing in the Project areas

In the framework of the current project, a second key category of PAPs will be people living along the existing road. These PAPs are likely to be affected by construction activities such as disturbances caused by the Project's heavy vehicles traffic, access limitation, etc., but may also benefit from project-related employment opportunities. In the long term these individuals, households, and business owners may also suffer some economic losses as a result of diversion of traffic from their current location. The project will include designated survey and funds to help offset negative economic impact by providing additional and new economic opportunities along the new highway alignment.

3.5.3 Municipality and village representatives

A third category of important PAPs will be municipality and village representatives (general population of villages). Each municipality has a mayor, city council with a chairman, and in each village, there are the trustees of a mayor and governors. Every village has a village representation building, where 5-10 people are employed (funded from the state budget); these are: Representative of Mayor in the village, culture specialist, agricultural specialist, manager.

3.6 Other interested parties

The term “**Other interested parties**” (OIPs) refers to “individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups” (World Bank, 2018b).

3.6.1 Other interested parties – External

The table below summarizes the key categories of OIPs and the respective justification for their interest in the project.

Table 3: Other interested parties - external

Other interested parties	Interest in the project
Ministries and Government agencies - Ministry of Economy and Sustainable Development, Ministry of Finance, Ministry of Infrastructure - Ministry of Environmental Protection and Agriculture - National Agency of Public Registry	Overall: To ensure project compliance with Georgian legislation (e.g., energy policies, environmental performance) during construction and operation - Promote economic development - Specific involvement in some project-related mitigation measures - Engage with the public and disclose the Local Georgian EIA Scoping Report, EIA Report and Environmental Decision - Register land plots as required under the project

Other interested parties	Interest in the project
Ministry of Culture & Agency for National Heritage Preservation	Responsible for sites of potential archaeological interest that could be affected by the project, and monuments of national interest in the vicinity of the Project
Municipalities	Protect the rights of inhabitants in the project area Represent the local communities/PAPs; receive and address any feedback and grievances from them
Non-governmental organisations (local, regional, national)	Ensure the environmental and social performance of the Project is protecting the environment and affected people and complies with international Environmental and Social (E&S) standards
Business and labour organisations	Interest in procurement and supply chain, potential environmental and social impacts as well as community health and safety
Other project developers reliant on or in the vicinity of the Project (e.g., associated facilities) and their financiers (e.g., ADB ³ , EBRD ⁴ , KfW ⁵ , IFC ⁶)	May require operation of the Project to enable the export of power Can help Identify interactions and cumulative impacts with other proposed developments
Press and media	Inform residents in the project area and the wider public about the Project implementation and planned activities
General public, tourists, jobseekers	Interest in the general socio-economic impacts of the project, both adverse and beneficial
Academic institutions (e.g., universities, think tanks, schools), Independent researchers	Potential concerns regarding environmental and social impacts Potential educational/outreach opportunities to increase awareness and acceptance of the project

3.6.2 Other interested parties – Internal

Internal interested parties with stakes in the project include RD Staff; Supervision Consultants; Contractors; Sub-contractors; service providers, suppliers and their workers.

3.7 Disadvantaged / Vulnerable individuals or groups

Disadvantaged /vulnerable individuals or groups are those who may be disproportionately affected by the project and/or less able to benefit from opportunities offered by the project due to specific difficulties to access and understand information about the project and its environmental and social impacts and mitigation strategies.

The project area includes some groups of people classified as vulnerable. Kakheti region has not had a high concentration of Internally Displaced People (IDPs) relocated from the adjacent breakaway Autonomous Republic of Abkhazia or the region of Tskhinvali.

Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an

³ Asian Development Bank

⁴ European Bank for Reconstruction and Development

⁵ Kreditanstalt für Wiederaufbau (Credit Institute for Reconstruction)

⁶ International Finance Corporation

individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend. These are (i) female-headed households with and/or without dependents; (ii) disabled household heads and/or members; (iii) poor households as defined by the official poverty line; (iv) elderly households with no means of support; (v) households without security of tenure; (vi) Ethnic minorities (if any); and (vii) refugees or internally displaced people.

Focus group discussions will be conducted to reach all vulnerable and disadvantaged stakeholder groups that might require special attention in consultation, e.g., women/women-headed households, elderly, disabled people, and other identified vulnerable groups.

Specifically, the Project aims to enhance rural women's economic opportunities in Kakheti region by addressing the two identified gender gaps: lack of local marketplace and lack of business advisory services for women.

Women in rural Georgia, including Kakheti, play an essential role in agriculture, but several gender gaps constrain them. These gaps include unequal access to land, financing, and agricultural training. To address these gender gaps, the Project will construct a marketplace with appropriate facilities conducive to men and women and reserve half of the market stalls for women traders. The advisory support will be provided to women from the area of impact in Winter 2026 before launching the new marketplace.

The Project will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive.

If during the project implementation there will be language or other problems identified with disadvantaged groups/vulnerable individuals, the convenient forms of engagement will be proposed for them: printed information about the project activities in language understood by them; small group consultations, including separate consultations with women will be organized, among other measures.

This SEP ensures that the vulnerable groups outlined above will have the chance to participate in discussion on the Project design, impact, and mitigation plans, as well as benefit from project activities. Where other affected parties, interested parties, and vulnerable groups are identified in the project implementation, their needs will also be considered and reflected in the SEP document.

3.8 Summary of stakeholder interest in and influence over the project

The table provided below summarizes the level of interest in and potential influence over the project of the various stakeholder categories identified above.

Table 4: Analysis and prioritization of stakeholder groups based on level of interest in and influence over the project

	High ability or likelihood to influence or impact the project (engage directly and frequently, e.g., every half a year or more)	Medium ability or likelihood to influence or impact the project (engage at least once a year)	Low ability or likelihood to influence or impact the project (engage indirectly, e.g., through official announcements and mass media)
High level of interest in the project	People affected by land acquisition and Physical resettlement	Municipalities	

	• People residing in project areas • Vulnerable households • outside vendors • vineyards' and other small business owners • Ministries and Government Agencies		
Medium level of interest in the project	• NGOs • Press and Media • Vulnerable households • outside vendors •	• Businesses and workers' organisations	• Academic institutions, independent researchers, • General public, tourists, jobseekers
Low level of interest in the project			• Other project developers and their financiers

4.0 Stakeholder engagement program

The SEP envisages that consultation meetings will take place with relevant interested parties before the commencement of the project and during the project implementation on an as-needed basis. Consultation and engagement activities are required to address current stakeholder suggestions, ideas or concerns. Consultations will take place, as much as possible in face-to-face interactions within the affected and beneficiary settlements.

Planned stakeholder engagement activities

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the three main project stages (RAP preparation, implementation and project design; construction; post-construction and operation phase). A more detailed explanation of the stakeholder engagement methods used is included in section 4.2.

Table 5: Planned stakeholder engagement activities by project phase

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
<i>Preparation and implementation; Detailed Design</i>	Project Affected Parties - People affected by land acquisition and physical resettlement; People residing in project area; Vulnerable households	Land acquisition process; Assistance in gathering official documents for early land registration; Compensation rates and methodology; Project scope and rationale; Project E&S principles; Resettlement and livelihood restoration options; Grievance mechanism process Information and processes will be tailored to the needs of the affected groups in particular taking into consideration needs of vulnerable households in terms of language, literacy, timings and locations of consultations, and accessibility to information and procedures.	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Mass/Social Media Communication – Facebook, webpage; Disclosure of written information – Brochures, posters, flyers, website Information desks – in Municipality and Camps; Grievance mechanism PAP survey – Upon completion of resettlement	Project launch meetings in municipalities; Monthly meetings in affected municipalities and villages; Survey of PAPs in affected villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant; Municipal grievance committee

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Local women	Project design; Project impact, and mitigation plans; Economic opportunities under the Project by addressing the two identified gender gaps: lack of local marketplace and lack of business advisory services for women; <i>Note:</i> Engagement with women groups will continue during the construction phase, and records of environmental and social issues raised, and complaints received during consultations, field visits, informal discussions, formal letters, etc., will be followed up	Consultation Meetings, In-depth interviews; Focus group discussions; Presentations, Project brochures and leaflets; <i>Note:</i> In-depth interviews and focus group discussions will involve intensive individual interviews with a few respondents to explore their perspectives on a particular idea, program, or situation;	Project launch meetings in municipalities; Focus group discussions, meetings in affected municipalities, villages, households;	RD (Environment & Social Team, project manager, local government – Gurjaani mayor office); Municipal grievance committee
	Other Interested Parties (External) National Agency of Public Registry; Municipalities (including Mayor's representatives in villages)	Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance mechanism process	Face-to-face meetings; Joint public/small group/individual meetings with PAPs	Weekly (as needed)	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant;
	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Labour organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers	Land acquisition process; Grievance mechanism process; Project scope, rationale and E&S principles	Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, web-page; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipality and Camps; Grievance mechanism; Project tours for media, local representatives	Project launch meetings; Monthly meetings in affected municipalities and villages; Communication through mass/social media (as needed); Information desks with brochures/posters in	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant;

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
				affected municipalities (continuous)	
	Other Interested Parties (External) Other Government Departments from which permissions/clearances are required; Other project developers reliant on or in the vicinity of the Project and their financiers	Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Grievance mechanism process	Face-to-face meetings; Invitations to public/community/focus group meetings	As needed	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant;
	Other Interested Parties (Internal) Other RD Staff; Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers	Project information - scope and rationale and E&S principles; Training on ESIA and other sub-management plans; Grievance mechanism process	Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings	As needed	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant;
Construction (mobilization, construction, demobilization)	Project Affected Parties - People affected by land acquisition; People residing in project area; Vulnerable households	Land acquisition process (land registration; compensation rates and methodology; livelihood restoration) Grievance mechanism process; Health and safety impacts (EMF, Construction-related safety measures); Employment opportunities; Environmental concerns; GBV awareness-raising Information and processes will be tailored to the needs of the affected groups in particular taking into consideration needs of vulnerable households in terms of language, literacy, timings and locations of consultations, and accessibility to information and procedures.	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; individual outreach to PAPs Mass/Social Media Communication - Facebook; webpage; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipality and Camps; Grievance mechanism Citizen/PAP survey - Upon completion of resettlement and/or construction	Monthly/quarterly meetings in all affected municipalities and villages with ongoing construction; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant; Supervision consultant; Contractor/sub-contractors; NGOs/trainers; Municipal grievance committee

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (External) National Agency of Public Registry; Municipalities (including Mayor's representatives in villages)	Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance mechanism process	Face-to-face meetings; Joint public/community meetings with PAPs	Weekly (as needed)	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant; Supervision consultant; Contractor/sub-contractors; Contractor/sub-contractors;
	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers	Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Health and safety impacts; Employment opportunities; Environmental concerns; Grievance mechanism process	Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, webpage; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipality and Camps; Grievance mechanism; Project tours for media, local representatives	Monthly/quarterly meetings in all affected municipalities with ongoing construction and headquarters; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	RD (Environment & Social Team, project manager, land acquisition and registration unit);

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (Internal) Other RD Staff; Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers	Project information - scope, rationale and E&S Principles; Training on ESIA and other sub-management plans; Grievance mechanism process	Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings	As needed	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant; Supervision consultant; Contractor/sub-contractors;
Post-construction and Operation phase <i>(within life of the Project and defect liability period)</i>	Project Affected Parties - People affected by land acquisition; People residing in project area; Vulnerable households	Satisfaction with engagement activities and GRM; Grievance mechanism process; Community health and safety measures during TL operation; Accessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any) Information and processes will be tailored to the needs of the affected groups in particular taking into consideration needs of vulnerable households in terms of language, literacy, timings and locations of consultations, and accessibility to information and procedures.	Public meetings, trainings/workshops, individual outreach to PAPs Mass/Social Media Communication – Facebook, webpage; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipality and Camps; Grievance mechanism PAP survey - Upon completion of resettlement	Meetings in affected municipalities and villages (six-monthly); Survey of citizens/PAPs in affected villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	RD (Environment & Social Team, project manager, land acquisition and registration unit); RAP consultant; Supervision consultant; Contractor/sub-contractors;

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public, tourists, jobseekers	Grievance mechanism process; Community health and safety measures during construction and operation;	Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, webpage; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information desks - In Municipality and Camp.; Grievance mechanism; Project tours for media, local representatives	Meetings in affected municipalities (six-monthly); Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	RD (Environment & Social Team, project manager, land acquisition and registration unit);

4.1 Detail on engagement methods to be used

4.1.1 Public/community meeting

At the start of the project, RD and consultants will organise project launch meetings in each village of the municipality. From then on, project manager will help organize community meetings/sensitization sessions in the villages on a quarterly basis and additional ones upon request throughout the project's lifecycle. Based on socio-economical study conducted in frames of ESIA and RAP reports, the number of HHs with vulnerable family members were identified, the information regarding the project impact was provided directly to them through family visits, beside to this the special job-related trainings will be offered to them.

4.1.2 Mass/social media communication

The RD public relations division will engage a dedicated person on the Project in order to post information on the RD's webpage, T and Facebook page , and to communicate with the local population via social media campaigns and to monitor media/social media and check if there are any project related issues, in case of any complains related to the Project, these issues will be immediately forwarded to Environmental and Social Affairs division for further review and response. Social media channels will be used as much as possible to disseminate information as rates of social media use (especially Facebook,) appear to be high across users of different age and background in project affected communities.

The RD will periodically, including at key project milestones, publish short communication materials ("feedback cards") on its official Facebook page. These materials will summarize key issues, comments, and suggestions raised by project affected persons and other stakeholders during consultations and explain how such feedback has been considered and addressed by the Project.

The feedback cards will be presented in a concise and accessible format and will serve as a supplementary, non-formal channel for sharing consultation outcomes and demonstrating responsiveness to stakeholder inputs. This approach does not replace the formal Grievance Mechanism (GM) but complements it by enhancing transparency and awareness of how stakeholder feedback is reflected in project decisions.

Stakeholders will continue to be encouraged to use the Project's GM for submitting formal complaints or concerns, while the periodic feedback cards will support broader information disclosure and reinforce trust by visibly closing the feedback loop.

4.1.3 Communication materials

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. RD will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance both in English and Georgian. The website will also provide information about the grievance mechanism for the project (see next sub-section).

4.1.4 Grievance redress mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project. A Grievance Redress Mechanism will be established to allow a PAP to complain about any decision about activities regarding assets or sources of income and their compensation, as well as other problems or concerns regarding the project. All types of grievances will be recorded by the GRM. Anonymous grievances will also be accepted, recorded, and investigated to an extent feasible. A GRM guidebook/manual will also be developed, and suggestion boxes installed in each affected village. The RD planned and established the dedicated GRM electronical System/database to capture and track grievances received under the Project. GRM committees at the municipal level will benefit from training on receiving, responding to, addressing, and closing grievances in line with best international practices. Internal GRM training will also take place for RD contractor staff. The RD's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will consist of the possibility to submit grievances electronically. It will also provide information

on how the GRM committee works, both in-process and deadlines. Multiple channels for receiving grievances will be provided, including phone, email, mail, web-based comment box, social media. Verbal complaints delivered on-site will also be recorded and processed via the GRM. The Project will create dedicated communication materials (GRM pamphlets, posters) to help residents familiarize themselves with the grievance redress channels and procedures.

4.1.5 Project tours for media, NGOs and local governments' representatives

At appropriate points during the construction phase, site visits or demonstration tours will be organised for selected stakeholders from local media outlets, NGOs or local government.

4.1.6 Information Desks

Information Desk in the municipality will provide local residents with information on stakeholder engagement activities, construction updates, contact details of the RD project manager etc. Brochures and fliers on various project related social and environmental issues will be made available at these information desks in the municipality and Camps.

4.1.7 Citizen/PAP perception survey

A perception survey examining citizen's experience and feedback about the project will be carried out twice during the project's lifecycle: once around the mid-implementation phase, and once towards the end of the project's implementation.

4.1.8 Trainings, workshops

Finally, trainings on a variety of social and environmental issues will be provided to RD and contractor staff and possibly relevant government or non-government service providers. Issues covered will include submission of information for vulnerable PAPs in appropriate way (printing materials, translation of materials and moderation of consultations in languages understood by them, providing accessible spaces for consultations, tailoring job-related trainings to their needs, etc.) and a sensitization to gender-based violence risks.

4.2 Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances, as described in section 4.1.4 above. The project manager will ensure proactive outreach to all population groups. Training and awareness raising sessions will be conducted in villages rather than municipal centre to ensure higher participation of targeted population (balanced by gender and age). Focus groups dedicated specifically to vulnerable groups and minorities (if any) may also be envisaged as appropriate.

4.3 Information disclosure

The current RD website (www.georoad.ge) is being used to disclose project documents, including those on environmental and social performance in both Georgian and English. Prior to the project financing support by WB will be effective, RD will create a webpage on the Project on its existing website. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the homepage of RD's website. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on the website. Details about the Project GRM will be posted on the website. An electronic grievance submission form will also be made available on RD's website. Contact details of Social and Environmental Team and headquarters will also be made available on the website. RD will update and maintain the website regularly (at least once a quarterly basis).

RD will continue to disclose project information during project construction and implementation. Information will be understandable, accessible and culturally appropriate. Special measures for groups with specific needs such as ethnicity, disability, literacy, gender, age, mobility, differences in language, or accessibility will be incorporated.

4.3.1 Confidentiality and Privacy Protocols

In accordance with Law of Georgia on Personal Data Protection and ESS10, the project ensures that all stakeholder engagement activities are conducted with due respect for privacy and confidentiality.

Personal and sensitive information will be obtained during consultations, such as names, addresses, telephone numbers, or any other identifiable data, will be collected and managed in compliance with applicable data protection standards.

All such information will be securely stored on a password-protected computer, accessible only to authorized personnel of RD and the Engineer's/Contractor's social team directly involved in stakeholder engagement and grievance management. When project documents, consultation records, or engagement summaries are disclosed publicly (on webpages or in community information boards), any personal identifiers (e.g., participant names or contact details) will be redacted (blurred) to protect individual privacy.

All staff handling stakeholder information will be briefed on confidentiality requirements and are obliged to process such data solely for project-related purposes. Unauthorized access, use, or sharing of personal data will be strictly prohibited and subject to internal review.

5.0 Roles, Responsibilities and Resources for Stakeholder Engagement

5.1 Implementation Arrangements

RD will mobilize human and material resources to implement the SEP and manage the GRM. SEP activities will be led by RD's Environmental and Social Issues Division with relevant responsibilities and the Public Relations Department. A Social and Environmental Team, specifically the project's Stakeholder Engagement Specialist, will take responsibility for, lead and coordinate all aspects of the stakeholder engagement. The team will be supported by consultants, as needed. A communication specialist and facilitator from the Public Relations Department, will be an integral part of the SEP Team. The Head of Environmental and Social Issues Division will be overall in charge of the grievance resolution mechanism. The Project Grievance Focal Point will also be part of the Social and Environmental Team. Furthermore, a number of resettlement specialists from the Resettlement Unit will be engaged to implement the RAP(s). Environmental and Social specialists will be responsible for the environmental and social impact assessment and performance of the Project. Specific named personnel will be established for these roles as the project progresses.

The material resources that RD will mobilize are – (i) a Project specific area on the RD website; (ii) an electronic grievance database; (iii) a stakeholder engagement register; (iv) RD Facebook page; (v) printed documents (manuals, brochures, posters, etc.) that will be used, based on the needs of the SEP.

The implementation of the SEP is under the responsibility of the RD. Contractors and subcontractors (including the PMS contractor) are not allowed to implement engagement activities directly but have to collaborate with the RD within the framework of the SEP. Likewise, contractors will handle grievances, received on local level, but, if approached by stakeholders on this issue, have to address them to the RD. The RD, the contractors and subcontractors have to liaise regularly to discuss on status of activities and on emerging issues that should be included in engagement activities. The contractors and subcontractors have to report to the RD on a periodic basis regarding general activities progress so that the information can be disclosed to stakeholders during the planned activities.

The RD will keep track of all engagement activities performed in a Stakeholder Engagement Activities Register, which will include management forms, minutes of meetings, photos and all relevant material used or prepared for the activity (announcements, posters, brochures, presentations, attendees' sheet, pictures, etc.). The RD will establish and maintain privacy and confidentiality protocols for storing and disclosing personal information.

5.2 Roles and Responsibilities

The Environmental and Social Team comprised of RD with the support of Public Relations Department will take responsibility for and lead all aspects of the stakeholder engagement. However, to implement the various activities envisaged in the SEP, the Social and Environmental Team will need to closely coordinate with other key stakeholders – other national and local government departments/agencies, RD divisions, the Supervision and ESIA/RAP consultants, the contractor along with sub-contractors, affected municipalities and PAPs. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

Table 6: Responsibilities of key actors/stakeholders in SEP Implementation

Actor/Stakeholder	Responsibilities
RD Social and Environmental Team	• Planning and implementation of the SEP and various plans (RAPs ESIA, etc.). • Leading stakeholder engagement activities; • Management and resolution of grievances; • Coordination/supervision of contractors on SEP activities; • Supervision/monitoring of RAP and Implementation Consultants; • Monitoring of and reporting on environmental and social performance to RD management and the World Bank

Actor/Stakeholder	Responsibilities
Supervision Consultants	• Supervision/monitoring of Contractor; • Management of engagement activities during the construction phase
Contractors/sub-contractors	• Inform RD of any issues related to their engagement with stakeholders; • Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by RD/Supervision Consultant and by participating in the local Grievance Resolution Committee; • Prepare and implement various plans (e.g., Contractor's Environmental and Social Management Plan, Labor Management Plan, etc.); • Inform local communities of any environmental monitoring e.g. dust, noise, vibration, water quality monitoring; • Announce important construction activities (such as road closures and available alternatives);
National Government Departments - • Ministry of Economy and Sustainable Development • Ministry of Environmental Protection and Agriculture, • Agency for Protected Areas • Ministry Culture • National Agency of Public Registry	• Monitor Project compliance with Georgian legislation; • Participate in the implementation of some activities under the ESMP and SEP; • Participate in the implementation of the Land Acquisition process; • Make available and engage with the public on the Scoping and EIA Reports.
Affected municipalities and local communities	• Transfer all complaints to the RD GRM Focal Point; • Participate in the local Grievance Resolution Committee (see Section 6.0 Grievance Mechanism); • Make available the disclosed ESIA documents.
Project affected people	• Invited to engage and ask questions about the Project at Project Meetings and through discussions with Environmental and Social Team where it is of interest or of relevance to them; • Lodge their grievances using the Grievance Resolution Mechanism defined in the SEP (Section 6.0 Grievance Mechanism); • Help the Project to define mitigation measures.
Other Project developers	• Engage with RD regarding project design; • Share ESIA information and documentation with RD to enable the assessment of cumulative impacts.

5.3 Estimated Budget

A tentative budget for implementing the stakeholder engagement plan over 24 months (up to 2 years) of USD 75,000⁷ will be allocated for implementation of the SEP. The budget includes staff and consultants involved in SEP implementation, travel costs, printing and media costs, among others to ensure continuous information disclosure

⁷ The tentative budget for SEP is attached to this document.

and engagement. The stakeholder engagement activities will cover a variety of environmental, social and expropriation issues, which may be part of other project documents, so it is possible that they have also been budgeted in other plans. However, RD will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and a new revision distributed. The budget will be revised accordingly.

6.0 Grievance Redress Mechanism

The GRM addresses grievances in an efficient, timely and cost-effective manner, that arise in the Project, either due to actions by RD or the contractor/sub-contractors employed by RD, from affected communities and external stakeholders. Separate mechanisms are being developed to address worker grievances in line with the project Labor Management Procedures. RD is responsible for managing the GRM, but many of the grievances on the Project will likely relate to the actions of the Contractor and so will need to be resolved by the Contractor(s). RD with the support of the Supervision Consultant will administer the GRM process deciding whether they or the Contractor is responsible and determining the best course of action to resolve the grievance. The Supervision Consultant will support RD to monitor grievance resolution being undertaken by the contractor.

The project GRM deals with the issues of land and other assets acquisition (e.g. amount of compensation, suitability of residual land plots, loss of access roads, etc.) as well as the losses and damages caused by construction works, and any other direct or indirect environmental and social impacts including grievances related to Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) related grievances. Therefore, the grievance redress mechanism was in place by the time RD starts preparation of RAP, ESIA and shall function until the completion of all construction activities and beyond till the defect liability period ends. PAPs and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultations meetings and other stakeholder engagement activities.

Typical grievances for highway projects include those related to:

- Land acquisition, economical and physical displacement;
- Construction damages (dust, vibration, noise, limitation of access roads, irrigation channels);
- Environmental impacts; and
- Direct and/or indirect social impacts.

RD implements an effective GRM, with the objective of helping third parties to avoid resorting to the judicial system as far as possible. RD's GRM includes three successive tiers of extra-judicial grievance review and resolution: (i) the first tier is the Grievance Resolution Committee (GRC) at the local level; (ii) the second tier is the GRM RD internal level; and finally, (iii) the third tier is the Grievance Redress Commission (GRC) comprising of senior RD management at RD headquarters level. Complainants can seek redress from the judicial system at any time. The step-by-step process does not deter them from approaching the courts.

All grievance related correspondence is documented, and the grievance resolution process will be systematically tracked. Anonymous complaints will also be recorded and investigated as part of the GRM.

6.1 Grievance Process

The three-stage grievance resolution process involves the following main steps:

- i. Receipt of grievances;
- ii. Screening for standing;
- iii. Grievance Resolution Committee (first stage);
- iv. RD resolution at central (RD) level (second stage);
- v. RD Grievance Redress Commission (third stage);

- vi. Closure of grievances;
- vii. Grievance records and documentation.

These steps are described hereafter.

6.1.1 Receipt of Grievances

Anyone from the affected communities or anyone believing they are affected by the Project can submit a grievance:

- By completing a written grievance registration form that will be available - (i) in the municipality and in the affected villages; (ii) Complainant boxes will be installed at the entrance of each construction site and camp; (iii) on the RD's website; and (iv) to Environmental and Social Issues Division in Tbilisi. An example of a grievance registration form is provided in Annex 4. The Project's manager will review the received grievances and record them in a Grievance Register.
- Via the Mayor of municipality or Mayor's representative of respective village at the Municipality level, Head of RD Environmental and Social Issues Division at the national level, or the environmental and social managers of the Contractor, either by phone, or in person. Grievances received verbally will be written down by the appropriated person on the grievance registration form and logged into the Grievance Register. A notification letter regarding the logged grievance will be sent to the complainant and inform her/him that the grievance has been noted and is under review and consideration.
- Contact information of RD is provided in chapter 6 below.

The contractors social and environmental managers and RD's, Head of RD Environmental and Social Issues Division will explain the possibilities and ways to raise a grievance to local communities or, Head of RD Environmental and Social Issues Division during meetings organised in each affected area at the time of disclosure. The GRM procedures will be disclosed through the RD's website and will also be advertised on billboards/posters in each community and at the entrance of the villages. Information material on the GRM will also be made available at the information desks in the hall of local Municipality.

All grievances will be registered, reported and tracked by RD in the Grievance Register by a Grievance Focal Point who is responsible for receiving, logging, referring and following up on grievances. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to prevent similar grievances. The status number and trends of grievances will be discussed between RD, the Contractor and the Supervision Consultant during weekly E&S meetings during the construction phase.

6.1.2 Screening for 'Standing'

Once a grievance is received, the RD Environmental and Social Issues Division will determine whether the complaint has 'standing,' i.e., whether it is related to the project or received from area where project activities are ongoing and could be related to the project.

The resolution of grievances of all types will follow the same steps, but the stakeholders involved will depend on the nature of the grievance. All grievances will be handled through the system described hereafter, involving respectively the RD Environmental and Social Issues Division Manager, the Grievance Focal Point, the Contractor's grievance resolution representative, and the Supervision Consultant as representatives of the Project. Complaints related to resettlement (land take and its consequences) will also involve RAP consultant in the resolution of grievances related to land acquisition and resettlement.

All grievances will be recorded in a grievance electronical log by RD's Grievance Focal Point. The following information will be recorded: (i) Name and contact details, (ii) Details of the grievance and how and when it was

submitted, acknowledged, responded to and closed out. All grievances will be acknowledged within 7 days; and responded to no later than 30 days. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to ensure proper close-out of the grievance and prevent similar grievances from recurring in the future.

If the grievance is not project related, the RD Environmental and Social Issues Division Manager will record the reason and document that the complainant has been informed of this decision and the basis for this is explained. Ineligible cases will generally be those that RD are confident have not occurred as a result of the actions of RD or its Contractor/Sub-Contractors. If the complainant is not satisfied with this outcome, they can pursue further action by submitting their case to RD's Grievance Redress Commission or the appropriate court of law (Rayon Court).

RD will determine whether the resolution of the grievance is the responsibility of the Contractor (or their sub-contractors), RD or the Supervision Consultant. If the grievance is the responsibility of the Contractor or the Supervision Consultant, RD shall review, comment and approve any corrective actions.

After logging the grievance, the RD Environmental and Social Issues Division Manager and/or the Grievance Focal Point will inform the complainant in writing within 10 days.

6.1.3 Grievance Resolution Committee (Stage 1)

Stage 1, of the GRM involves an informal (oral) review of the complaint (whether written or oral). A local GRC will be established in Municipality, with an office in the municipal building. Once a standing grievance has been logged, the corresponding local GRC will be engaged to define a solution to solve the grievance. At this stage the grievance is reviewed in an informal (oral) way and the Grievance Redress Committee members make and sign the minutes on the matter. If at Stage 1 the PAP's complaint is not resolved the PAP is informed about grievance resolution procedures of Stage 2. A PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 7 days. The GRC shall convene as per necessity (but at least once a month) and shall include eight members. Special provisions will be made for any complaints of a confidential nature. The GRC is an eight-member committee comprising of the following:

- 1) Roads Department of Georgia (RD) representative as a Committee coordinator;
- 2) Regional/municipal representative as a Committee secretary;
- 3) Village attorney as a Committee member;
- 4) Elected two Representative of PAP of which at least one is woman as a Committee member;
- 5) Representative of local non-government organization (NGO) taking into account the grievance character – as a Committee member;
- 6) Local specialist of social and environmental safeguards from the Supervision Consultant – as a Committee member;
- 7) Local specialist of social and environmental safeguards from the Construction Company – as a Committee member.

To ensure GRC's effective functioning, it is not necessarily to have all 8 members on board, at least 3 members: such as representative of local municipality, PAPs representative and construction company representative are sufficient number persons to resolve the grievance on local level. The GRC will have regular meeting once in a week period.

The RD's Environmental and Social Issues Division manager will act as secretary of the GRC (creation, coordination, and documentation). Members of the GRC will be invited in accordance with the types of complaints to be addressed. The meeting will start without the complainants by reviewing all PAP complaints received since the last GRC meeting, and to propose a solution to all grievances within the past one or two weeks. Then, the GRC will welcome the complainants whose grievances had been reviewed during the previous meeting to discuss proposed resolution.

For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting and will also be provided to the PAP before the meeting. The GRC will then inform the PAP about the date, time and place of its review meeting, and invite the PAP accordingly.

The GRC will receive the complainant and discuss with them a solution to their grievance. The committee shall draw up and sign the minutes of their discussion on the matter. If the grievance is satisfactorily resolved, the PAP will also sign the minutes in acknowledgement of the agreement. In cases where the project has agreed to put in place additional measures, these will be specified, with a timetable for delivery, in the minutes of the meeting. If the grievance remains unresolved, the PAP will be explained the Stage 2 escalation process.

Grievance redress procedure of Stage 1 is an informal tool of dispute resolution during the project preparation and implementation stages and allowing PAPs and the project implementation team to resolve the disagreement without any formal procedures, procrastination and impediments. International experience in different projects shows that such informal grievance redress mechanisms help to solve most of the complaints without formal procedures (i.e. without using the procedures specified in the Administrative Code or litigation). If the PAP is not satisfied, the grievance redress mechanism assists him/her in lodging an official grievance in accordance with the procedures of Stage 2 (the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a grievance, format of grievance, terms of grievance submission, etc.).

6.1.4 Grievance Resolution at Central Level (Stage 2)

In this stage, the grievance will be reviewed at the RD level. Unsolved grievances at Stage 1, with the complainant's consent, will be sent to RD in written form. Similarly, aggrieved complainants/PAPs dissatisfied with the GRC decision, can escalate their grievances to RD at the central level. The GRC will assist him/her in lodging an official complaint. RD's GRM Focal point and, RD Environmental and Social Issues Division Manager will review the written complaints of PAPs, which were not satisfied at Stage 1 and send them internally to the appropriate departments (legal, technical, contracts etc.) for redress. The RD internal timeframe for referral is 10 days. The complainant shall be informed of the decision within a maximum of 30 days, in accordance with the response time stipulated in the Administrative Code of Georgia.

6.1.5 RD's Problematic Issues (Social and Environmental) Redress Commission (Stage 3)

If the grievance continues to be unresolved at Stage 2 by the appropriate department, it will be presented to RD's Problematic Issues (Social and Environmental) Redress Commission. The RD's Problematic Issues (Social and Environmental) Commission has regular meetings (At least once in a month) and during the meetings will review and decide upon the grievance in compliance with the Administrative Code of Georgia. The complainant shall be informed in writing of RD's decision. If RD's decision fails to satisfy the aggrieved affected persons, they can pursue further action by submitting their case to the appropriate court of law. The composition of the Problematic Issues (Social and Environmental) Redress Commission is as follows

- 1) Chairman of the Roads Department of Georgia (Chairman RD's Problematic Issues (Social and Environmental) Redress Commission);
- 2) Deputy Chairperson of Roads Department of Georgia (member);
- 3) Deputy Chairperson of Roads Department of Georgia (member);
- 4) Deputy Chairperson of Roads Department of Georgia (member);
- 5) Deputy Chairperson of Roads Department of Georgia (member);
- 6) Head of the Department's State-Budget-Funded Road Projects Management Division (member);
- 7) Head of the Department's Donor-Funded Projects Management Division (member);
- 8) Deputy Head of the Department's Donor-Funded Projects Management Division (member);

- 9) Head of the Department's Environmental and Social Issues Division (member);
- 10) Deputy Head of the Department's Environmental and Social Issues Division (member);
- 11) Deputy Head of the Department's Environmental and Social Issues Division (member);
- 12) Head of the Resettlement Unit of the Department's Environmental and Social Issues Division (member);
- 13) Head of the Registration Unit of the Department's Environmental and Social Issues Division (member);
- 14) Head of the Department's Project Design Division (member);
- 15) Head of the Department's Financial Management Division (member);
- 16) Deputy Head of the Department's Legal Division (member);

6.1.6 Closure of Grievances

A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented to the satisfaction of the complainant, a complaint closes out form will be signed by both parties (Environmental and Social Issues Division Manager or his representative and the complainant), stating that the complainant considers that his/her grievance is closed. The grievance then, will be archived in the Project Grievance database.

In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or the complaint is proven to be fraudulent. In such situations, the Project's efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. RD will not dismiss grievances based on a cursory review and close them unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

6.1.7 Grievance Records and Documentation

RD will nominate a GRM Focal Point to manage a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by the Contractor or other relevant party; the final result; and how and when this decision was communicated to the complainant.

6.1.8 Protocol for Handling Sensitive Complaints including Gender-Based Violence and Sexual Exploitation and Abuse/Sexual Harassment Related Complaints

RD will establish a protocol for confidential survivor-centred approach to handling sensitive complaints, including those related to gender-based violence, sexual exploitation, abuse or harassment involving project personnel. The protocol will establish clear guidelines on the Do's and Don'ts of handling such complaints such as maintaining confidentiality of the complainant, requesting only most essential information, informing the complainant of their choice to register the complaint with other institutions, referring the complainant to urgent medical help or other relevant services, among others. All project workers and local communities will receive awareness training on the availability of the GBV-sensitized grievance mechanism. Grievance focal points will receive in-depth training on applying the protocol for sensitive complaints. For the development of protocol and training RD will engage qualified GBV and SEA/SH expert.

All information regarding the grievances submitted during the project implementation received complaints, and ways and means for their practical and timely solution will be collected in the annual reports prepared by RD and submitted to the WB (e.g. Grievance monitoring and reporting will occur in RD's quarterly and annual reports).

6.2 Workers' Grievance Mechanism

RD, currently, does not have internal grievance mechanism in place which allows its employees to raise workplace concerns. The conciliation procedure is provided by the Labor Code of Georgia. There is no system in place to track grievances received by RD employees.

RD requires contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of civil works. The construction contractors will prepare their labor management procedure in line with the project's LMP before the start of civil works, which will also include detailed description of the workers grievance mechanism.

The workers grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances;
- a register to record and track the timely resolution of grievances;
- a responsible department to receive, record and track resolution of grievances.

The Supervision Consultant will monitor the contractors' recording and resolution of grievances, and report these to RD in their monthly progress reports. The process will be monitored by the GRM Focal Point, a RD representative who will be responsible for the project GRM.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed.

6.2.1 Maintaining Confidentiality Protocol:

This Confidentiality Protocol template will help RD to manage confidential information in complaint process as a formal document defining processes, roles, and responsibilities. To make it work best for the project, it should be tailored to fit project needs and structured in align with WB ESF, Georgian legal requirements, and current systems in your organization. Get feedback from your team and from relevant experts to ensure it covers everything needed before finalizing.

1. Introduction

This protocol outlines the procedures for maintaining confidentiality during the management of grievances and concerns related to the three-road project. Ensuring confidentiality is critical for building trust and protecting the rights of complainants. It encourages reporting of grievances without fear of retaliation. The objective is to protect the confidentiality of complainants at all stages of the grievance mechanism to ensure that information related to complaints is managed securely.

The objective is to protect the confidentiality of complainants at all stages of the grievance mechanism to ensure that information related to complaints is managed securely and to protect complainants from fear of retaliation.

2. Scope

This protocol applies to all personnel involved in the complaint management process within the project implementation unit and other relevant external parties involved in grievance handling and resolution.

3. Responsibilities

- **Grievance Focal Point:**
 - Ensure that all complaint-related information is handled confidentially in line with defined confidentiality procedures.
 - Limit access to confidential information to authorized personnel only and update the list of authorized personnel regularly.
 - Provide regular training to all staff on confidentiality practices and the importance of safeguarding complainant information.
 - Do internal monitoring to ensure all procedures are followed.
 - Investigate breaches of confidentiality, if they occur.
 - **Staff members:**
 - ☑ Follow confidentiality protocol at all times.
 - ☑ Report any breaches of confidentiality to the grievance officer immediately.
- **Confidentiality Procedures:**
 - Record all complaints in a database with restricted access.
 - Ask complainants for their consent before you work on the grievance or share any personal information or complaint details.
 - Ensure that the complainant fully understands what explicit consent means and its potential implications.
 - Write down what information the complainant agrees can be shared, including the date, scope, and any conditions on information-sharing (e.g., "you may share this information but only with certain people" or "you may say the location but not my name or job").
 - Remove identifying information such as names, locations, and jobs from documents that might become publicly available, such as monitoring reports. Be careful with information about the subjects of complaints.
 - Remove all personal names and, if possible, the names of locations from documents circulated within the project, between stakeholders, and included in publicly available reports. Consider using a complaint ID # only for the grievance log.
 - Screen all documents related to the complaint and keep documents with sensitive information in a safe (locked) place.
 - Restrict access to complaint details to specific staff members and authorized personnel only.
 - Consider having a secure and separate database in which the complaint ID # is linked to names and places.
 - Keep an updated record of who is on a data-sharing list. Update the list each time a person with access leaves the project or moves to a different position.

- o Store all documents related to complaints in a secure, locked storage room.
- o Ensure electronic documents are encrypted and has controlled access.
- o Stay alert to new security threats such as office break-ins or computer viruses.
- o Do not disclose any information about complaints to unauthorized parties.
- o Where possible, share information only with individuals who have a need to know, under strict confidentiality agreements.
- Breach of Confidentiality:
 - o Any breach of confidentiality must be reported immediately to the grievance officer to take an action.
- Review and Updates
 - o This protocol will be reviewed and updated [add the term, e.g., annually, biannually, quarterly] as necessary, to reflect changes in regulations, best practices, project requirements, or lessons learned.
- Contact Information

For questions or concerns about this protocol, please contact the designated officer.

6.2.2 Establishing Anonymity: Checklist

the list below is used to establish mechanisms for submitting anonymous complaints and to ensure feedback wherever possible:

Mechanisms to Submit Anonymous Complaints	Mechanisms to Ensure Feedback to Anonymous Complaints
☐ Setting up a physical drop box in an accessible place to receive written anonymous complaints. The project must ensure there are no video surveillance cameras in the area that could capture the drop box.	☐ Announcing the summarized decision with the outcomes or actions taken based in publicly available domains if appropriate and safe to do so.
☐ Establishing a telephone “hotline” directly to the project grievance mechanism (GM) staff.	☐ Digitized GM platforms.
☐ Website portals for dealing with complaints.	☐ Website portals for tracking complaints.
☐ Anonymous online survey tools where respondents can submit complaints without identifying themselves.	☐ Publish anonymous feedback reports that summarize issues raised and actions taken, ensuring that no personal information is disclosed.
☐ Anonymous mobile reporting apps that allow users to report complaints anonymously, with no personal data collected.	
☐ Provide a mail service where individuals can send in anonymous complaints, and ensure that the service does not track or record identities.	

When RD design and operate the grievance mechanism (GM), it is necessary to establish a protocol to maintain confidentiality. The checklist below to establish and maintain confidentiality under your project to protect people, communities, organizations, and the information they share. This can be used for training, onboarding of new staff, or internal monitoring on how confidentiality is maintained.

6.2.3 Workers' GRM structure:

- Construction Company level: Project manager or human resource manager will be assigned as a grievance focal point. If there is a situation in which the complaint cannot be resolved by the contractor management, workers may also file a complaint with the supervision consultant or RD. the respective contact information will be provided to all workers prior to beginning activities on the project.
- Supervision company level: Human resource management, environmental, or social specialist will serve as Grievance Focal Point to file the grievances and appeals. He/she will be responsible to coordinate with relevant departments/organization and persons to facilitate addressing these grievances. If the issue cannot be resolved at the Supervision company level within 14 working days, then it will be escalated to the RD.
- GM will be accessible to all employees through various means (in-person, written, telephone, fax, social media etc.). Grievance logbook will be maintained in the supervision company office.
- Workplace complaints will be treated confidentially, and only necessary information will be reported to other responsible staff as needed for resolving the case.
- RD and every employer (contractor, supervision consultant, etc.) will adopt a protocol for safe, confidential, and survivor-centred approach to handling of sensitive complaints such as those related to SEA/SH. Such protocols will be based on GBV and SEA/SH service provider mapping for the country and project area to ensure safe and confidential referral of SE/AH survivors to adequate services upon their choice.
 - The Project workers' grievance mechanism will not prevent workers to use judicial procedure.
 - Moreover, monitoring of work-related grievances will be carried out by the SC (Social Consultant) of RD on quarterly basis. Same person will review received grievances and their resolution, and prepare a short summary to be included in the annual report to WB.

The Supervision Consultant will monitor the contractors' recording and resolution of grievances, and report these to PIU in their monthly progress reports. The process will be monitored by the GRM Focal Point, a PIU representative who will be responsible for the project GRM.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed.

The project manager of the civil works company will ensure that the sub-contractors have information about GRM and relevant procedure in place for their employees prior to engaging in any project activities.

6.3 RD Contact Information

The point of contact regarding grievance management and the local stakeholder engagement activities is the Head of Environmental and Social Issues Division:

Description	Contact details
Organization:	Roads Department of Georgia (RD)
To:	Head of Environmental and Social Issues Division
Address:	12 Kazbegi ave., Tbilisi 0160, Georgia
E-mail:	info@georoad.ge
Website:	www.georoad.ge

Information on the Project and future stakeholder engagement programs will be available on the Project's website and will be posted on information boards in affected villages in the Project area.

Six-monthly E&S reports that document the implementation of the Stakeholder Engagement Plan (SEP) will be disclosed on the Project website and made available in the local town halls.

In addition, for information on engagement with national and international stakeholders, and for information on the environmental and social performance of the Project, NGOs, civil society organizations, and media are invited to contact RD in Tbilisi.

7.0 Monitoring and Reporting

7.1 Monitoring reports during construction

The SEP will be periodically revised and updated as necessary in project implementation to ensure that the information presented herein is consistent and is the most recent. The identified engagement methods remain appropriate and effective concerning the project context and specific phases of the development

Quarterly and semi-annual Monitoring reports documenting the environmental and social performance of the Project during construction will be prepared by the Social and Environmental Team for submission to RD management and to the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. Table 9 proposes a comprehensive set of indicators related to SEP performance at this stage.

Table 8: SEP Indicators to Be Documented In Progress Reports

Engagement with PAPs
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number of men and women that attended each of the meetings above
Number, location, attendance and documentation of the meetings held with the municipalities and communities or other stakeholders
For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project ESMP.
Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the report. They will summarize the view of attendees and distinguish between comments raised by men and women.
Engagement with other stakeholders
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs)
Issues raised by NGOs and other stakeholders, actions agreed with them and status of those actions
Minutes of meetings will be annexed to the six-monthly report
Number and nature of Project documents publicly disclosed
Number and nature of updates of the Project website
Number and categories of comments received on the website
Grievance Resolution Mechanism
Number of grievances received, in total and at the local level, at Tbilisi office, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.

Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of local GRC meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report)
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods
Workers Grievances
Number of grievances raised by workers, disaggregated by gender of workers and worksite
Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.
Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

The reporting on Environmental and Social activities conducted by RD and the Supervision and ESIA/RAP Monitoring Consultants during the construction phase will be undertaken in accordance with the requirements of the ESMP.

7.1.1 Quarterly and Annual Reports by RD

During the Project development and construction phase, the Social and Environmental Team will prepare brief monthly reports on E&S performance for RD Management which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 8. Monthly reports will be used to develop quarterly and annual reports reviewed by senior RD deputy Heads. The quarterly and semi-annual reports will be disclosed on the RD website and made available in the affected Municipality.

7.1.2 Compliance Reports to the World Bank

compliance reports will be prepared and submitted to the World Bank before and during the construction period. A section on stakeholder engagement will be included in these reports which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 8.

7.2 Monitoring reports during operation

7.2.1 Annual Reports by RD

At the end of each year of operation, Social and Environmental Team will prepare an annual summary report on E&S performance for RD Management which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 8. The annual reports will be disclosed on the Project website and made available in the Town halls of the project affected Municipalities.

7.2.2 Six Monthly E&S Compliance Reports to the World Bank

During the first three years of operation, six-monthly and annual E&S compliance reports will be prepared and submitted to the World Bank. Annual E&S compliance reports will then be prepared and submitted to the World

Bank during the rest of the operation period. A section on stakeholder engagement will be included in these E&S compliance reports.

In addition, RD will prepare Incident Notifications for the World Bank, if and when, required.

7.3 Involvement of stakeholders in monitoring activities

The Project provides several opportunities to stakeholders, especially Project Affected Parties to monitor certain aspects of Project performance and provide feedback. Grievance Resolution Committees in the affected Municipality will allow PAPs to submit grievances and other types of feedback. Citizen/PAP surveys at the project mid-point and end stages will also allow PAPs to provide feedback on project performance. Furthermore, frequent and regular community meetings and interactions with RD staff will allow PAPs and other local stakeholders to be heard and engaged.

7.4 Reporting back to stakeholder groups

RD's Social and Environmental will report back to PAPs and other stakeholder groups, primarily through public meetings in project affected Municipality and/or Villages. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GRM will be responded to in writing and verbally, to the extent possible. SMS and phone calls will be used to respond to stakeholders whose telephone numbers are available. Key Project updates will be posted on RD's website and Facebook Page: საავტომობილო გზების დეპარტამენტი.

8.0 References

1. World Bank. 2018. *Environmental and Social Framework*;
2. World Bank. 2018a. *Template for ESS10: Stakeholder Engagement and Information Disclosure Stakeholder Engagement Plan and Stakeholder Engagement Framework*. Environmental and Social Framework for IPF Operations. ESS10: Stakeholder Engagement and Information Disclosure;
3. World Bank. 2018b. *Guidance Note for Borrowers*. Environmental and Social Framework for IPF Operations. ESS10: Stakeholder Engagement and Information Disclosure;
4. Eco-Spectri Consulting Ltd. Project for Modernization of the Second Lot of Tbilisi-Bakurtsikhe (Eastern part of Sagarejo - Bakurtsikhe) of International Tbilisi-Bakurtsikhe-Lagodekhi-Azerbaijan Border (S5) Road. Prepared for: RD. (2020);
5. Resettlement Action plan (15.03.2021); Project for Modernization of the Second Lot of Tbilisi-Bakurtsikhe (Eastern part of Sagarejo - Bakurtsikhe) of International Tbilisi-Bakurtsikhe-Lagodekhi-Azerbaijan Border (S5) Road;
6. RAP prepared for Lot 5 Tbilisi-Bakurtsikhe (Eastern part of Sagarejo - Bakurtsikhe) of International Tbilisi-Bakurtsikhe-Lagodekhi-Azerbaijan Border (S5) Road. (Under the Update);
7. RAP prepared for Lot 4 Tbilisi-Bakurtsikhe (Eastern part of Sagarejo - Bakurtsikhe) of International Tbilisi-Bakurtsikhe-Lagodekhi-Azerbaijan Border (S5) Road. (Under the Update);
8. RAP prepared for Gurjaani (Chumlakhi) – Telavi (30 km) road section (August 18, 2018).

Annex 1: Grievance Submission Form

Grievance Submission Form	
Gurjaani Municipality village #	
Name, Last name	
Contact Information Please indicate the preferable means of communication (Mail, Telephone, E-mail)	☐ Mail: Please indicate the postal address: _____ _____ _____ ☐ Telephone: _____ ☐ E-mail: _____
The language desirable for the communication	☐ Georgian ☐ English ☐ Russian
Describe the grievance/claim: What is the complaint about? What is the claim?	
Date of Negotiation:	Resolution of Negotiation:
What is the basis of your claim?	
Signature: _____ Date: _____	

Annex 3. Public Grievance Leaflet

The Roads Department is striving to ensure that the construction of the Project will not result in adverse impacts for those living near to its project site or for other potentially affected stakeholders. However, should there be any issues we would like to hear about any concerns or grievances or comments and suggestions that you may have in relation to the project activities.

What kind of grievance can I lodge?

Anyone can lodge a grievance if they feel that project activities are negatively affecting them, their community or their local environment. Example of grievances could include, but are not limited to:

- Mishandling of the land acquisition process (pre-construction);
- Noise of construction works (construction);
- Damage to private and common assets and properties;
- Community health and safety, for instance in relation to impacts of increased traffic (construction);
- Practices that endanger the health, safety and security of employees working on the project;
- Failure to meet the labor rights of employees working on the project.

Comments and information requests will also be accepted; these may be recorded in the same way as grievances and will be answered to the best of the ability of RD.

How can I submit a grievance?

Anyone can submit a grievance to the RD in the following ways:

- By phone hotline: (+99532) 2 31 30 76
By email: info@georoad.ge
- In person by completing the attached Grievance and Information Request Form and posting it to / dropping off at the following address: Georgia 0160, Tbilisi, A.Kazbegi st. N12.

Alternatively drop boxes are be set up during the construction phase at each of the local municipalities affected by the project. These will be emptied at least once a week and reviewed.

How will the RD deal with my grievance?

RD will go through the following steps to deal with your grievance:

Step 1: Acknowledgement: RD will contact you to acknowledge your grievance and request within the following timescales:

- From 5 to 21 business days for a grievance depending on the issue;
- Immediately acknowledge and record a verbal complaint and within 5 to 10 business days for a written complaint;
- Comments may take longer to process and response to comments will be completed within 21 working days depending on the issue.

This acknowledgement will include your grievance reference number, the person at AGL responsible for tracking your grievance and their contact details and the expected a date for completing the investigation into your grievance (where appropriate).

Step 2: Investigation: RD will then set up an investigation into your grievance. They may need to contact you during this investigation for further information.

Step 3: Resolution: once your grievance has been investigated you will be contacted with the findings and RD's proposed response. If the investigations find that the grievance does not relate to the projects activities or that RD is working within the relevant Georgian and international standards in relation to grievance, we will explain this in writing to you.

Step 4: Follow Up: RD may contact you at a later stage to check our activities pose no further problems.

Confidentiality: if you would like your grievance to remain confidential. RD will ensure that your name and contact details are not disclosed without your consent and only the RD team directly working on the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

Annex 4: SEP Public Consultation Minutes⁸

⁸ will be amended as soon as the draft will be reviewed and confirmed

Annex 5 Meetings Summary Template

Date	Location	Stakeholder Group	Stakeholder Category	Format	No. of Participants (F/M/T)	Key Concerns Raised	Proposed Actions / Next Steps