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REGULATORY IMPACT ASSESSMENT ON THE STANDARDS FOR COMMUNITY ENGAGEMENT FOR NEW DEVELOPMENT PROJECTS

FINAL REPORT

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24 JULY 2020

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ABSTRACT

Under the framework of the USAID Energy Program (the Program), the Policy and Management Consulting Group's (PMCG) prepared the Regulatory Impact Assessment (RIA) on the Community Engagement Standards. The objective of the Program is to support strengthening Georgia's energy security and economic growth by facilitating investment in power generation capacity. The USAID Energy Program supports the Government of Georgia in reforming the energy market in compliance with the European Union Energy Acquis.

RIA on the Community Engagement Standards comprises of an extensive desk review of the existing legislative framework and international best practice, as well as situational analysis and stakeholder consultations. At the initial stage stakeholder consultations/interviews were designed to study the existing situation in terms of community engagement, identifying the problems and gaps in this light, best practices, and lessons learned. To develop alternative scenarios of community engagement addressing the main challenge and its causes, the research team set respective goals and specific objectives.

The situational analysis revealed that the main problem in need of a solution is the lack of effective and timely communication with the community regarding the existing and planned energy projects. Whereas the main goal of this report is to suggest activities of meaningful engagement within the context of an overall communications program and help the Government and respective energy units to bridge the communication gap through the application of the commended communications program.

The research team developed alternative scenarios addressing various identified problems and discussed with the energy stakeholders. For more enhanced results, a multifactor analysis was administered to identify the economic, social and environmental impacts of each scenario. As a result of the consultations and multifactor analysis which comprised of the feasibility levels of the scenarios, the research team selected the most appropriate and feasible scenario. The suggested scenario focuses on the mobilization of financial and human resources, capacity development through developing guidelines and training to ensure the meaningful consultation process at the Environmental Impact Assessment (EIA) stage. The scenario also aims at practicing community engagement at all phases of the project development through awareness-building efforts.

ACRONYMS

ADB	Asian Development Bank
CENN	Caucasus Environmental NGO Network
EAC	Environmental Assessment Code
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESCO	Electricity Market Operator
GEDF	Georgian Energy Development Fund
GNERC	Georgian National Energy and Water Supply Regulatory Commission
GREDA	Georgian Renewable Energy Development Association
GSE	Georgian State Electrosystem
IAP2	Association of Public Participation
IDB	Inter-America Development Bank
IFC	International Finance Corporation
IFI	International Financial Institution
M&E	Monitoring and Evaluation
MEPA	Ministry of Environmental Protection and Agriculture of Georgia
MoESD	Ministry of Economy and Sustainable Development of Georgia
MW	Megawatt
NGO	Non-Governmental Organization
PMCG	Policy and Management Consulting Group's
PPP	Public-Private Partnership
RIA	Regulatory Impact Assessment
SEP	Stakeholder Engagement Plan
USAID	United States Agency for International Development
WEG	World Experience for Georgia

CONTENTS

EXECUTIVE SUMMARY

The purpose of this document is to develop a RIA on community engagement standards. This RIA was administered by the Policy and Management Consulting Group's (PMCG) within the frame of the USAID Energy Program.

Over the last decade, it has been claimed that decisions on energy projects in Georgia lacked the appropriate level of community engagement. The adoption of the Environmental Assessment Code (EAC) in 2017 significantly enhanced the level of public participation in the environmental decision-making process[1]. The EAC is the first piece of Georgian legislation which requires comprehensive public participation, specifically during this process. The EIA procedure, however, is only a small part of energy projects. Although, the local community is an important stakeholder in energy projects, sector-specific energy legislation fails to provide adequate consideration to community engagement.

Currently, Georgia faces challenges among which are the inability to utilize its energy resources and produce a self-sufficient amount of energy annually and thus has to balance an increased demand for energy through imports. As stated in the paper drafted by World Experience Georgia "The public protest is an important reason for stalling or delaying the execution of 124 announced projects."[2] Among many other factors determining whether renewable energy projects will succeed or not, community engagement is prominent.

The EIAs and public hearings are frequently treated only as licensing requirements, rendering them mere 'box-ticking exercises' with just enough community engagement to obtain government approval to proceed with the project. Even though community engagement has become a commonly used term internationally, its application is inconsistent, often disregarding the perception of meaningful consultations and the various levels of engagement.

The key focus for this RIA is the lack of meaningful engagement of communities affected by energy projects, often leading to a lack of broad acceptance of such projects by the said communities. Obtaining broad community support and a social license to operate requires financial, human and time resources. Without the allocation of resources in this direction, the project will almost certainly face delays and incur extra costs to smooth-out relations with the affected communities.

While broad acceptance might be achieved by addressing non-engagement issues related to energy projects, meaningful engagement ought to be one of the pillars of such acceptance. Without practicing meaningful timely engagement, community protests will remain as a hindering factor to the implementation and sustainability of energy projects. Additionally, if broad acceptance is not ensured, projects run a high risk of being suspended.

Based on the consultations with the stakeholders and the multifactor analysis utilized in scopes of RIA, the most feasible scenario addressing the identified problems of the current community engagement was chosen. The main highlights of the scenario are as follows:

- The selected scenario aims at capacity building and resource mobilization for the community engagement within the scope of the existing legal framework. The scenario envisages the creation of positions for the community engagement specialists within the respective agencies, design of appropriate job description and required funds allocation for the personnel or outsourcing options;
- A guideline for stakeholder analysis and engagement should be in place, that will ensure the following aspects are considered: stakeholder analysis is performed; Stakeholder Engagement Plan (SEP) is drafted based on surveys and studies; all stakeholders are identified, including the community and the various subgroups of the community, central and local government, Non-Governmental Organizations (NGOs). The SEP should set out clear roles and responsibilities among various stakeholders, including communities, NGOs, etc.;
- A guideline describing practical tools for internal and external monitoring and evaluation should be drafted. All the relevant stakeholders, including NGOs participating in the community engagement or monitoring the process of the engagement, should be trained according to the newly drafted guidelines;

[1] Public participation in decision-making on energy projects, Policy Brief 2018, Green Alternative
[2] Problems of Hydro plant Constructing in Georgia – Dead-end or Opportunity? Opinion, World Experience Georgia, 2018 http://weg.ge/sites/default/files/hpps_eng.pdf

- The first level of engagement (Inform Phase) of IAP2 Spectrum should be practiced throughout the project cycle. Informing level entails providing stakeholders balanced and objective information throughout the project, even though it is not a two-way process, it serves a solid basis for community engagement.

Rendering the results of the consultative engagement, the implications of any scenario developed within the scope of the present RIA serve as a legal basis for their implementation. Without legal reinforcement of recommendations, the anticipated results and impact might be disputable.

INTRODUCTION

The purpose of this document is to provide a RIA on the community engagement standards. USAID Energy Program aims at supporting Georgia's energy security through the improved legal and regulatory framework and increased investments in the energy sector. Energy legal and regulatory framework that complies with European requirements and encourages competitive energy trade and private sector investments can be considered as a supreme expected outcome of the project. The Program is being carried out by Deloitte Consulting LLP as a contractor to the United States Agency for International Development (USAID).

The present RIA is administered by the PMCG. The document aimed to collect evidence for policymakers through the assessment of possible results of different problem-solving alternatives. The RIA is a consistent process comprising of the following stages: (i) definition of the problem; (ii) determination of the goals; (iii) elaboration of policy options; (iv) evaluation of policy options; (v) comparison of policy options; (vi) monitoring and assessment mechanism; and (vii) consultations with stakeholders.

1. DOCUMENT STRUCTURE

The document is prepared in line with the best international practices and Recommendations on the RIA National Framework of Georgia. The report consists of the following chapters:

- Consultations with Stakeholders: Reviews the key issues identified in the process of consultations with stakeholders;
- Problem Identification: Identifies the problem and describes its characteristics; in addition, analyzes the main causes of the problem;
- Setting Objectives: Based on the problems identified through research, defines the basic and specific goals;
- Identifying Scenarios: Describes different ways of achieving the outlined goal (including the status quo);
- Assessment and Comparison of Alternative Scenarios: Qualitatively evaluates the cost and benefits of each option; analyzes the impact of the scenario in economic, social and environmental contexts;
- Recommendations: Based on the results of the alternative scenario comparison, the recommendations for the best scenario are drafted.

2. CONSULTATION WITH STAKEHOLDERS

In the course of the present RIA, consultations with stakeholders aimed to reveal the essence of the discussed problem for different groups to define goals and objectives as well as to determine the attitude of stakeholders towards different policy options and create awareness on the planned changes.

At the initial stage of the project, the research group identified a wide range of stakeholders, including the following categories directly and indirectly related to community engagement in renewable energy projects in the country: Representatives of Central and local governments; Companies/organizations funding and developing the projects; Media; Companies responsible for drafting various mandatory documents including but not limited to EIAs and SEPs; NGOs; Communities affected by energy projects (Annex 1). To ensure the effectiveness of the consultations, the research group administrated tailored questionnaires for each category of stakeholders (Annex 2).

Consultations with stakeholders had two cycles. The initial stage of consultations consisted of 18 interviews with various stakeholders. At the initial stage stakeholder consultations/interviews mainly aimed to study the existing situation in terms of community engagement, identifying the problems and gaps in this light, best practices, and lessons learned.

The questionnaires were tailored to the specifics of each group, but all of them covered the following key issues:

- General Assessment of the situation / general satisfaction with the engagement level existing currently;
- Assessment of the community engagement mechanisms in light of legal regulations and requirements;
- Barriers and difficulties faced by energy projects;
- Stakeholders of the energy projects, identification, communication of the project activities, including awareness-raising, etc.

The second cycle of the stakeholder consultations aimed at identifying the attitudes of the stakeholders on the alternative scenarios developed by the working group. During the consultation, the research team offered a brief presentation regarding the identified problem and suggested solutions to the problems, followed by discussions and sharing of insights.

POLICY CONTEXT

Over the last decade, it has been claimed that decisions on energy projects in Georgia lacked the appropriate level of community engagement. The adoption of the EAC in 2017 significantly enhanced the level of public participation in the environmental decision-making process[3]. The EAC is the first piece of Georgian legislation which requires comprehensive public participation specifically during this process. The Code is applicable to all types of infrastructure projects (including energy projects) requiring an EIA. The EIA procedure, however, is only a small part of energy development projects, which include five important phases: preliminary development; development; implementation; operation; and decommissioning. Environmental decision-making, for which an EIA is required, is a part of the development phase. For some projects with a lesser environmental impact (for example, a hydropower plant with less than 2 MW), public participation is not required by the law, and community engagement is merely down to the project developer's goodwill. Aside from the EAC, other laws related to the energy sector at the moment do not include specific public participation requirements. For example, the new Law on Energy and Water Supply fails to reflect the importance of community engagement during the project development process. Despite the fact that the local community is an important stakeholder in energy projects, sector-specific energy legislation pays inadequate regard to community engagement.

WHY COMMUNITY ENGAGEMENT MATTERS

The Georgian energy sector currently faces several challenges. The country is unable to utilize its energy resources and produce a self-sufficient amount of energy annually, therefore faces need to balance an increased demand for energy through imports. As stated in the paper drafted by World Experience Georgia "a protest wave against the construction of hydropower stations in Georgia has

[3] Public participation in decision-making on energy projects, Policy Brief 2018, Green Alternative

reached its peak recently. For a majority of citizens, HPPs are associated not so much with useful electricity and progress, as with environmental damage, involuntary resettlement, threats to interests and health of population. The public protests are often the reason for stalling or delaying about 124 announced projects."[4]Among many other factors determining whether renewable energy projects will succeed or not, community engagement is prominent. Indeed, community engagement is believed to be a vital part of any energy project, since without the strong support of the communities affected by or interested in the project, success can be difficult if not impossible to achieve. Poor stakeholder engagement might result in a lack of trust, and delayed engagement might even incite protests and blockades. Protests against the energy projects are referred in Situating Social Practices in Community Energy Projects by Angela Pohlmann; 'it is notable, that protests against energy projects are a key obstacle facing energy projects. Protests are particularly strong if communities have no or limited opportunities to take part in the planning of the energy projects"[5].

As stated in the Guide to Community Engagement for Power Projects in Kenya "stakeholder and community engagement is a continuous process required throughout a project's life cycle. If conducted well, community engagement can both benefit local communities and pay important dividends in terms of avoiding or lessening delays due to unresolved community concerns, or even avoid costly lawsuits"[6].

In cases where the local communities have not been engaged in meaningful, timely, or productive way, projects have suffered from delays or derailment. Meaningful engagement is conducive to achieving mutual goals for the investor/developer as well as the relevant communities. Investor/developer goals may include an efficient project development cycle and a profitable business model, while community goals may include appropriate mitigation of project impacts, compensation for land use, cultural protection, and/or other forms of benefit sharing[7].

Delayed and unmeaningful engagement might also encourage pro-environment NGOs to mobilize communities. Moreover, communities might also refuse to participate in consultations, obstruct construction work, and impede project implementation. Contrarily, early and meaningful consultations with the communities adds value to projects. It enables the affected persons to arrive at informed views which are then considered by the project management, thereby contributing to better project design and implementation. It also enhances the sense of trust, project acceptance and local ownership among the communities[8].

Nevertheless, developers and the Government have concerns about community engagement in the consultation process. Many believe that early engagement may delay project planning and implementation, will add costs, and bring about unreasonable expectations thereby stirring tensions. Even though these can be considered valid concerns, avoiding transparent engagement with stakeholders would not eliminate such problems. On the contrary, it may even exacerbate them, for example by fomenting rumors and suspicion which fuels local opposition to a project[9].

Community engagement largely entails building relationships and trust between the parties. It is best to allow sufficient time for relationships to grow, or to engage from an early stage. This helps to create a sense of co-ownership, and a sense of being a partner in the project. Establishing a sense of ownership, as well as trusting relationships, are sustainable endeavors and enable community members to engage genuinely. Therefore, it is important to find the right balance in public participation and to be clear on its meaning. In 1969, Arnstein proposed a ladder of citizen participation (ranging from manipulation to citizen control).[10] Elaborating on this further, the International Association of Public Participation (IAP2) more recently developed the Spectrum of Public Participation in order to classify the levels of engagement. The Spectrum identifies five levels of community engagement, where higher levels are not necessarily "better" and, indeed, lower levels may be appropriate in certain cases. If the covered issues are complex and controversial and thus carry greater social risk, however, adopting higher levels of engagement is necessary and can help to prevent conflict and

[4] Problems of Hydroplant Constructing in Georgia – Dead-end or Opportunity? Opinion, World Experience Georgia, 2018 http://weg.ge/sites/default/files/hpps_eng.pdf
[5] Angela Pohlmann. (2018). Situating Social Practices in Community Energy Projects. 10.1007/978-3-658-20635-2
[6] Guide to Community Engagement for Power Projects in Kenya, USAID, Power Africa, January 2018 www.usaid.gov/powerafrica/kenya
[7] Ibid
[8] Meaningful Stakeholder Consultation, IDB, 2017, https://publications.iadb.org/en/meaningful-stakeholder-consultation
[9] ibid
[10] Sherry R. Arnstein's "A Ladder of Citizen Participation," Journal of the American Planning Association, Vol. 35, No. 4, July 1969, pp. 216-224.

save time in the long run. According to recent guidance on meaningful consultation by some of the main international financial institutions, the *principle of proportionality* should guide the degree of effort to be applied in this regard: in projects with low or no risk, the consultation process can be limited to simple disclosure and information dissemination. Projects carrying moderate risk should entail two-way dialogue with affected stakeholders, while complex, large-scale or higher-risk projects require more systematic and thorough engagement with stakeholders through all phases of the project[11].

WHAT MEANINGFUL ENGAGEMENT MEANS

The EIAs and public hearings are frequently treated only as licensing requirements, rendering them mere 'box-ticking exercises' with just enough community engagement to obtain government approval to proceed with the project. According to Guide to Community Engagement for Power Projects in Kenya, "the approach of only engaging communities specifically to meet licensing and permitting requirements, or when troubles arise, is a practice that leads to dissatisfaction and a combative or defensive engagement with the community"[12].

Above all, community engagement should not be thought of as one or more isolated event(s). Instead, it should be preceded by an analysis of the project, its context and potential impacts, as well as the relevant stakeholders; and it should be followed by genuine consideration of stakeholders' views and concerns in decisions related to project planning and implementation.

Even though community engagement has become a commonly used term internationally, its application is inconsistent, often misinterpreting the value of meaningful consultations and the various levels of engagement. Several criteria should be met for a stakeholder consultation process to be considered meaningful. According to the Inter-American Development Bank, and supported by a working group of the main international financial institutions involved in large-scale project financing (including the Inter-American Development Bank (IDB), the Asian Development Bank (ADB), the World Bank (WB), the International Finance Corporation (IFC), and the European Bank for Reconstruction and Development (EBRD)), meaningful consultation is characterized by the following 10 key principles[13]:

1. The stakeholder consultation process should be **ongoing and iterative** throughout the project cycle, starting **as early as possible**;
2. It should ensure that **different categories of stakeholders** are represented and involved. This may include individuals and groups, as well as formal and informal local institutions;
3. Sufficient **resources** should be allocated. This includes monetary budgets as well as staffing and capacity, the willingness of project authorities to take stakeholders' views seriously, and the ability to modify designs and implementation to reflect stakeholders' concerns where possible. This may also include the need for the capacity building of affected stakeholders, or the need to establish a level playing field for different groups to engage;
4. It should be **transparent** and based on **factual information**, including the scope of the consultation and the ability of stakeholders to influence project decisions;
5. It should be **equitable** and **non-discriminatory**, and ensure that poorer or more vulnerable members of the group of affected stakeholders are given a voice;
6. Stakeholders should have prior **information** about relevant aspects of the project in a language, format, and manner that is appropriate for them;
7. Consultation events and other forums or **means of engaging** with stakeholders should be **respectful and free of coercion**. Stakeholders who express concerns or criticism about the project or authorities should be protected from retaliation;
8. **Confidentiality** of information and stakeholders should be ensured where appropriate;
9. To be meaningful, a consultation process should also **avoid consultation for consultation's sake**, or excessive discussions that do not lead to anything;
10. The process should be **systematically documented**, and relevant aspects of it should be **disclosed publicly**.

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[11] Meaningful Stakeholder Consultation, IDB, 2017, https://publications.iadb.org/en/meaningful-stakeholder-consultation
[12] Guide to Community Engagement for Power Projects in Kenya, USAID, Power Africa, January 2018 www.usaid.gov/powerafrica/kenya
[13] *Meaningful Stakeholder Consultation*, IDB, 2017, https://publications.iadb.org/en/meaningful-stakeholder-consultation ; and *Meaningful stakeholder engagement: a joint publication of the MFI working group on environmental and social standards*, IDB, 2019, https://publications.iadb.org/en/meaningful-stakeholder-engagement-joint-publication-mfi-working-group-environmental-and-social

It is worth noting, that no readymade formula for successful engagement exists, and all communities need to be approached in a tailored manner according to their cultural backgrounds as well as their genuine interests that may change throughout the project cycle.

CHALLENGES IN COMMUNITY ENGAGEMENT IN THE GEORGIAN ENERGY SECTOR

The main area of focus for this Regulatory Impact Assessment is the **lack of meaningful engagement of the communities** affected by energy projects, leading to a **lack of broad acceptance** of such projects by said communities. Our consultations with stakeholders identified the following root causes of this problem:

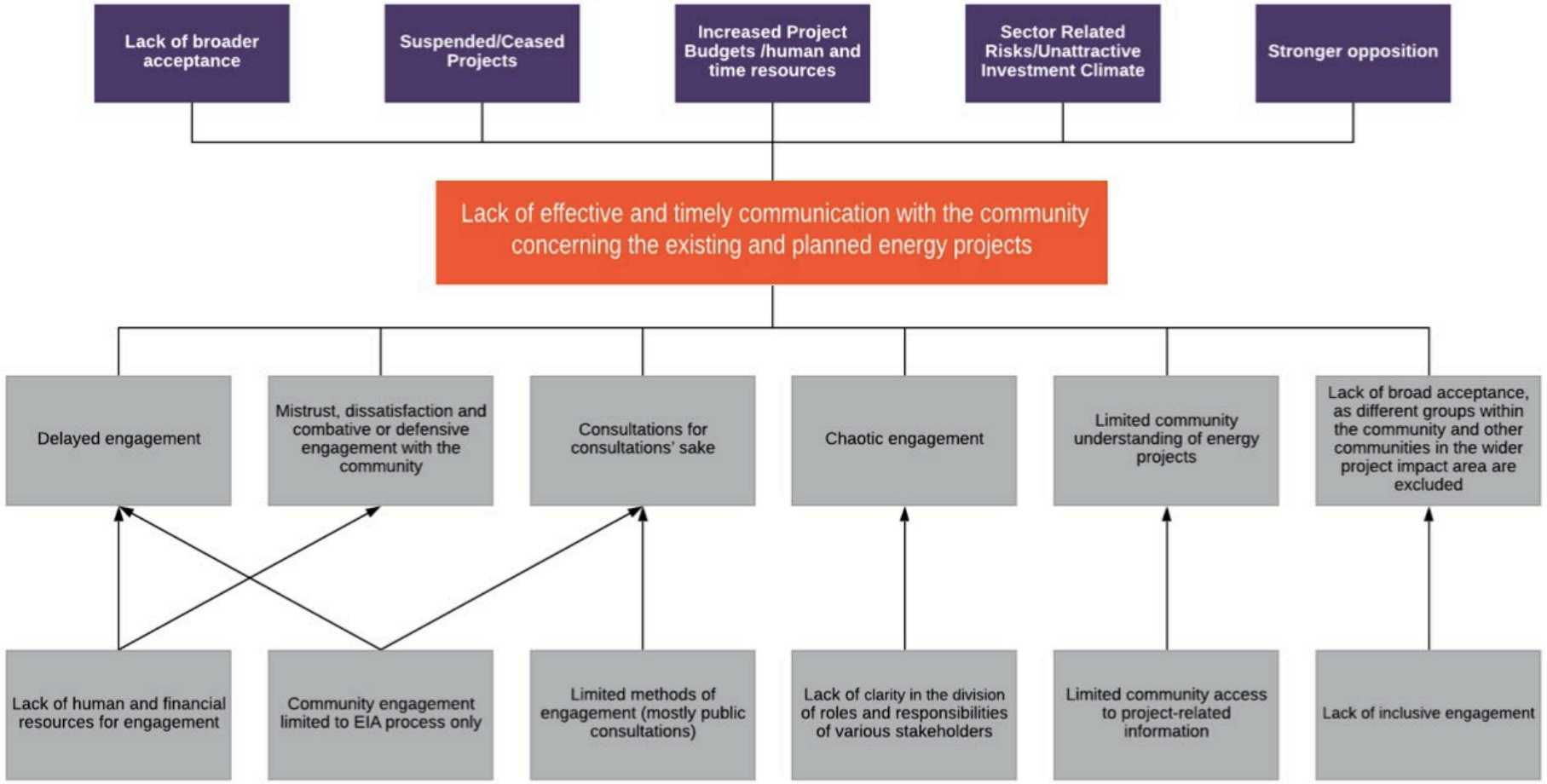
- Community engagement limited to EIA process only;
- Lack of clarity on the division of roles and responsibilities of various stakeholders;
- Lack of human and financial resources for engagement;
- Limited methods of engagement (mostly public consultations);
- Limited community access to project-related information; and
- Lack of inclusive engagement.

These root causes of the main problem result in one or more of the following consequences:

- Delayed engagement, causing mistrust, dissatisfaction and combative or defensive engagement with the community;
- Increased human, financial and time resources for the investor/developer or the Government;
- Limited community understanding of energy projects; and
- Lack of broad acceptance, as different groups within the community and other communities in the wider project impact area are excluded.

Based on our findings, these root causes and consequences are linked to insufficient consideration of the above-mentioned principles of meaningful consultation. The problem, causes and consequences, as well as their relation can be] viewed in Figure 1

Figure 1: Problem Tree



Meaningful Consultation Principle #1: Early, ongoing and iterative engagement

Current Reality in Georgia: Delayed engagement

Cause: Community engagement limited to EIA process only

As mentioned above, the adoption of the EAC significantly changed the level of public participation in the environmental decision-making process, although it should be highlighted that the EIA procedure represents only one of five phases of energy development projects.

In the stakeholders' view, the process of engagement envisaged by the EIA process is treated as the lowest priority on the list of necessary criteria to be met to obtain permits. As indicated above, this type of approach leads to a 'box-ticking' approach, resulting in non-meaningful consultations. Genuine engagement is important and requires meaningful processes to be planned, followed and fulfilled.

As community engagement in energy projects currently only happens at the stage where all project-related decisions have already been made, the affected communities have no real impact on the design and footprint of the project. At the initial level of the Project implementation, when communication with the public, in terms of creating awareness on the benefits of the project, is essential, the vision presented of energy sector development is unclear which hinders the trust-building process. If communities are informed about a project at a stage where no more changes can be made, they will often mistrust and oppose the project. Moreover, currently consultations 'benefit-sharing' is not often highlighted or explained and the 'social' plans and activities are not clearly presented to communities. As a result, the communities primarily focus on the environmental and social risks related to the project and largely neglect the benefits. Meanwhile, with no room for community input in the project, communities sometimes use whatever leverage they have such as blocking the public hearings by not attending, which leads to permits not being approved or opposing the projects by requesting high levels of compensation for project impacts, etc.

Community engagement limited to the EIA process only results in **delayed engagement** with the communities, leading to increased financial and human resources as well as increased time required for project implementation.

Meaningful Consultation Principle #2: Involvement of different categories of stakeholders

Current Reality in Georgia: Chaotic engagement; increased opposition

Cause: Lack of clarity in the division of roles and responsibilities of various stakeholders

The law and the respective regulations do not specifically address the engagement of various stakeholders and do not assign the corresponding roles and responsibilities among various stakeholders including NGOs and investors/developers. As community engagement is not the direct responsibility of the investor, few resources are allocated thereto. Engagement is formal and completed exclusively to comply with the law, or is completed as a reaction to a community protest. Since the roles and responsibilities in the process are not clearly defined, the community ends up with various "advisors" some of whom oppose the project.

A lack of clear assignment of roles and responsibilities of stakeholders opens up space for various stakeholders to get involved. These stakeholders might use the opportunity to advocate their own interests and priorities. The process can result in **chaotic engagement** leading to **increased opposition** and **increased human, financial and time resources** required for project implementation.

Meaningful Consultation Principle #3 and 9: Sufficient resources and meaningful consultations

Current Reality in Georgia: Delayed consultations; consultations for consultations' sake

Cause: Lack of human and financial resources for engagement; limited methods of engagement (mostly public consultations)

The practical implementation of community engagement in the EIA decision-making process is considered to be the responsibility of the Ministry of Environmental Protection and Agriculture of Georgia (MEPA), however in view of the stakeholders' there is a lack of respective resources and expertise. Past experience of engagement shows that the communities are inclined to oppose energy projects. Even though engagement is required by the law, it is expected to be unsuccessful so few resources of the responsible parties are directed towards it.

At the moment, public consultation is the only method used to engage with communities according to the stakeholders. No other means of engagement are required by law or practiced widely except for obtaining written feedback in the early stages of the EIA or gathering grievances through a grievance redress mechanism. The attitude towards the communities, as well as the general provision of engagement by law and the lack of respective regulations leaves the process up to the willingness of the investor/developer to engage meaningfully. The current practices undermine the possibility of meaningful engagement.

Furthermore, engagement needs to be monitored, evaluated and adjusted in order to become meaningful. The engagement could be to go beyond the standard consultation processes typically employed to meet planning approval and compliance requirements, although, as mentioned by the stakeholders, no mechanism for internal or external monitoring of the engagement process currently exists. Since both the planning and conducting of the engagement as well as the monitoring of the process are the responsibility of the MEPA with no provision for the involvement of external parties, the process complies only with minimal requirements and going no further than brief reports of the consultation process attached to the documents required by the EAC.

A lack of human and financial resources as well as a lack of understanding as to why engagement matters result in a **consultation that are only conducted for the sake of it;** as there is no willingness to engage meaningfully it is **rendered a tick-the-box activity.** As the consultations are being conducted only for consultation's sake, communities might feel disrespected, and might **mistrust** and strongly **oppose** the energy projects. All of this is hindering the **broad acceptance** of projects.

Meaningful Consultation Principle #4: Accessible, transparent and factual information

Current Reality in Georgia: Limited community understanding of energy projects

Cause: Limited community access to project-related information

Misinterpretation can be problematic when speaking of publicly accessible project documentation. Project-related documentation, once agreed and approved, is accessible, mostly in electronic format. Hardcopies can also be obtained at local government offices. The format of obtained public information on a project might be neither easily accessible nor understandable for all community members. Not all community members are able to fully absorb information regarding projects and struggle to digest large volumes of technical documentation. Additionally, a lack of information regarding the project triggers doubt in the project documentation, hinders project awareness, and leads to various interpretations of information (most of which are wrong). As a result, communities often oppose projects due to unsubstantiated perceptions of risk (e.g. the risk of springs drying out, or the increased risk of floods).

Media is considered one of the main sources for disseminating information on energy projects, although even media outlets lack sufficient information and/or understanding to cover the project in an impartial and balanced way. Currently, media outlets primarily broadcast sponsored (i.e. paid-for) coverage or articles that only serve the interests of the particular party that pays for the media report (e.g. the Ministry, the investor / developer, and NGOs). Conversely, sometimes media prefer to broadcast negative stories, covering conflicts rather than success stories. Meanwhile, no trainings are yet provided for media representatives in order to boost their awareness of the relevant process, terminology, etc.

Limited access to project-related information results in **limited awareness about a project**, heightening the project-related risks and concealing the benefits.

Meaningful Consultation Principle #5: Equitable and non-discriminatory engagement

Current Reality in Georgia: Lack of broad acceptance, as different groups within the community and other communities in the wider project area are excluded

Cause: Lack of inclusive engagement

Communities are among the main stakeholders in energy projects, although they are consulted less often than other stakeholders. Communities are generally perceived as potential "consumers" of the end-product, and not suppliers of information or resources. They are not considered as potential partners, or even supporters who are able to build up successful cases and advocate for energy projects, which could help to reverse the trend of negative attitudes towards such projects.

When communities are consulted, it is important to consider who is actually included in the term "community." Formally, only those representatives of communities whose immovable property and/or whose economic activity is directly affected by the project receive the highest level of engagement. Communities that are indirectly impacted (e.g. by noise or dust and are living in the nearby area) are usually excluded from this process. Furthermore, the fact that the communities are not homogenic and consist of various vulnerable groups is often overlooked; their voices are often not heard in consultations in their current form. Investors must adapt their communication strategies and adjust their budget for social activities according to the needs of various groups from the beginning, instead of doing so only after facing community protests and problems.

A lack of inclusive engagement neglects particular groups within communities and hinders the possibility of **broad acceptance**.

Principles #7, 8 and 10 regarding the consultations needing to be **respectful**, **confidential** and **systematically documented** were not valid in the relevant time and context according to stakeholders, although they might become important once the consultation process is improved.

Impact

The interviewees acknowledge that the current method of community engagement in the Georgian energy sector has a number of negative impacts. Obtaining broad community support and a social license for operation requires financial, human and time resources. Without the allocation of respective resources in this direction, the project will face delays and extra costs to smooth-out relations with the affected communities. While broad acceptance might be achieved by addressing non-engagement issues related to energy projects, meaningful engagement ought to be one of the pillars of such acceptance. Without practicing the meaningful engagement, including the crucial principle such as early engagement, community protests will remain as a hindering factor to the implementation and sustainability of energy projects. In extreme cases, when project developers and investor were unable to handle the protest, state measures such as the calling in of special forces were applied. Additionally, if broad acceptance is not ensured, projects run a high risk of being suspended. Suspended or delayed projects, apart from increased financial costs, send a negative signal to potential investors that has knock on effect on the overall investment climate. Investors usually acknowledge the potential problems they might face within communities and therefore are skeptical towards investing in large projects. Among the referred concerns were the lack of the Governments' proactive engagement in problem-solving processes to smooth-out relationships with the communities, and disregard towards overspending in the investor's allocated 'social' budget to counter community opposition. These factors discourage international investors and thus make the country less attractive in terms of future energy projects.

3. SETTING OBJECTIVES

To develop alternative scenarios of community engagement addressing the main problem and its causes, the research team set respective goals and specific objectives.

The main problem to be addressed is the lack of effective and timely communication with the community concerning the existing and planned energy projects. Whereas the main goal of the present RIA is to suggest meaningful engagement within the context of an overall communications program and help the Government and respective energy units to bridge the communication gap through the application of the commended communications program. Ten principles of meaningful engagement listed above can be leveraged to measure the level of meaningful engagement. However, identified causes of the problem need to be addressed as well.

The delayed engagement was one of the causes of the poor engagement envisaged only at EIA stage. In contrast, the meaningful engagement entails not only the early engagement, but also the engagement throughout the project cycle. According to the Inter-American Development Bank, and supported by a working group of the main international financial institutions involved in large-scale project financing (including the IDB, the ADB, the WB, the IFC, and the EBRD), the principle of proportionality should guide the level of engagement: in projects with low or no risk, the consultation process can generally be limited to simple disclosure and information dissemination, while projects with moderate risk should have a two-way dialogue with affected stakeholders and complex, large scale or higher risk projects require more systematic and thorough engagement with stakeholders throughout the project cycle.

The lack of human and financial resources assigned for the engagement task results in delayed intervention. It is relevant for the energy projects to plan community engagement well ahead of the project through the allocation of financial and human resources. Preliminary assessment should define the risks/impacts of the energy project and define the share of the budget to be allocated to the community engagement based on the level of the risk/impact. The lower the risks/impacts, the smaller the budget. Respective budgets as well as effective tools and mechanisms for internal and external monitoring and evaluation specifically focusing at community engagement process need to be in place. Capacities of the people responsible for the engagement require advancement in line with the developed practical guidelines to ensure the sustainability of the process.

Guideline for identification of stakeholders, including communities, to make sure that the engagement captures all groups of the community should be in place. The guideline should also define the roles and responsibilities of each actor in the engagement process.

Low awareness of the energy project should be addressed with increased accessibility of the project related information via multiple ways that are tailored to the communities' capabilities and interests. Low awareness and broader acceptance should be also achieved via incorporating multiple ways of engagement (consultation, forums, councils, etc.) with the communities that are also tailored to their capabilities and interests.

It is also important to identify the desired outcome. In case the meaningful engagement is achieved, in line with the "10 principles" lenses, several more indicators need to be measured. As soon as the size of the community affected is defined for each project, the evidence-based information regarding the broader acceptance should be collected. The vast majority of the community members have to demonstrate broader acceptance through surveys, acceptance of compensation packages, etc. The number of new or ceased/suspended energy projects opposed by the communities that have achieved broader recognition will be an important source of information. Monitoring and assessment of the project budgets as well as timelines can be measured to define whether the community opposition has led to additional time or human resources required to implement the projects or whether the budget, time and resources were planned in an adequate way.

4. POLICY OPTIONS

Three alternative scenarios, apart from the Status Quo option are developed in compliance with the identified problem and the defined objectives. The causes of the problem and the possible solutions to the causes are grouped in the table below. The table also lists the scenarios which possibly address the cause of the problem.

Figure 2: Causes of the Problem vs Scenarios

What Causes the Problem	How the Problem Can be Addressed / Measures	Alternative Scenario
Community engagement limited to EIA process only	Community engagement is practiced throughout the entire project cycle	Partially Scenario III; Scenario IV
Lack of clarity in the division of roles and responsibilities of various stakeholders/ Lack of inclusive engagement	The stakeholder identification and analysis are performed, Stakeholder Engagement Plan is drafted; Plan sets out the roles and responsibilities of the stakeholders; the process is participatory; implies monitoring and evaluation tools; definition of community and engagement of various sub-groups with particular focus on vulnerable groups is ensured	Scenario II, III, IV
Lack of human and financial resources for engagement;	Human capacities are enhanced, appropriate funds are allocated for capacity development, or the expertise is outsourced; Monitoring and Evaluation (M&E) measures are enhanced internally, and external M&E is outsourced to stakeholders	Scenario II, III, IV
limited methods of engagement (mostly public consultations)	The engagement means vary based on the community needs and project stakeholder engagement aims	Scenario II, III, IV
Limited community access to project-related information	Project-related information is accessible in various formats and is "friendly."	Partially Scenario II, Scenarios III and IV

The alternative scenarios are described below.

Status Quo

As of today, community engagement is limited to the EIA process only. International Financial Institution (IFI) standards are applicable only in case the projects are funded by the international banks or in some instances investors and developers are voluntarily following the IFI standards for community engagement. In the stakeholders' view, currently, there is a lack of meaningful engagement. The engagement is being conducted for consultation's sake; the involvement of various stakeholders is chaotic, and no clear roles and responsibilities are defined for multiple actors. Community engagement can be characterized as a reaction to the opposition rather than a systematic and manageable process. No proper funds are allocated to hire or train the respective staff in the responsible agencies and there is a limited requirement and expertise for monitoring and evaluation processes, internally as well as externally. The accessibility of the project related documents and the means of consultation practiced do not reach the targeted audience.

In case the status quo remains, the causes of the identified problem such as delayed, non-meaningful and chaotic engagement might cause even stronger opposition of the communities towards the energy projects not to mention the financial implications the projects might face.

Alternative Scenario II

Alternative Scenario II aims at capacity building and resource mobilization of the community engagement responsible parties in scopes of the existing legal framework.

To address one of the causes of the identified problem – **lack of financial and human resources**, an accurate job descriptions of the staff responsible for community engagement has to be drafted. If such a position is not envisaged within the structure, the position has to be created, and the respective budget has to be allocated for the additional staff. If the creation of such a position is impossible, the expertise should be outsourced.

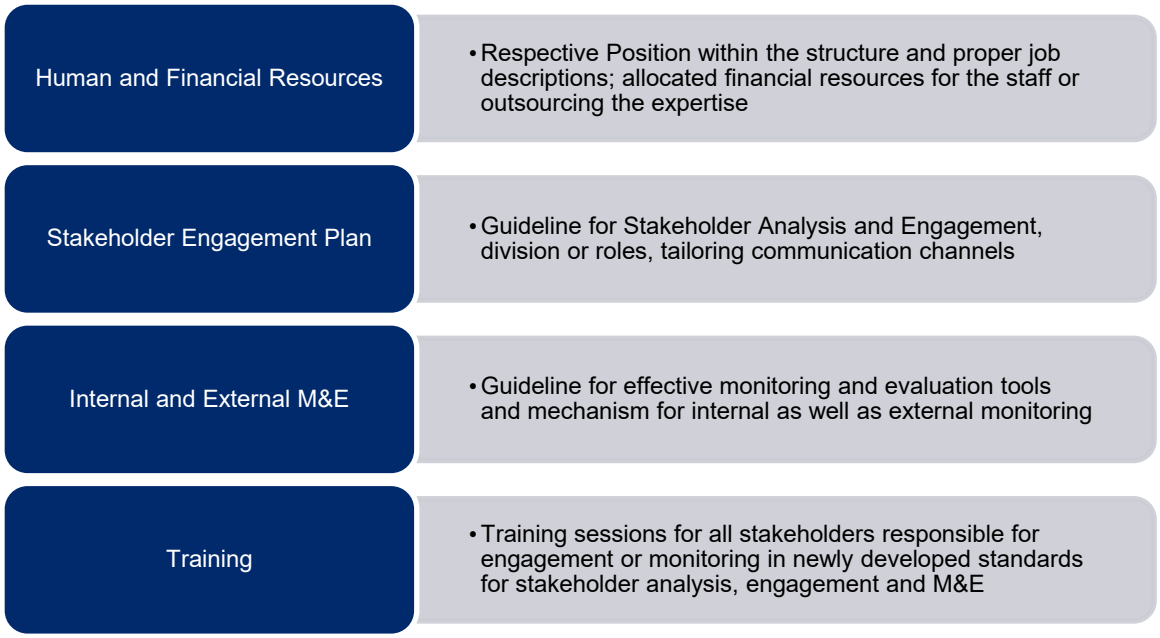
For addressing another cause of the problem – **chaotic engagement and lack of division of roles**, a guideline for stakeholder analysis and engagement have to be drafted. The guideline should be based on the best international practices and should envisage surveys and studies, identification of all the stakeholders, including the community and the various subgroups of the community, central and local government, NGOs. The identification and the analysis of the stakeholders should include tailoring the communication channels to the audience, ensuring the maximum outreach. The guideline should also focus on establishing clear roles and responsibilities among various stakeholders, including communities, NGOs, etc.

To address **the problem of ineffective monitoring and evaluation mechanisms**, guidelines describing practical tools for internal and external monitoring and evaluation should be drafted.

All the relevant stakeholders, including NGOs participating in the community engagement or monitoring the process of the engagement should be trained according to the newly drafted guidelines.

The figure below describes the four main blocks of the scenario.

Figure 3: Alternative Scenario II



Alternative Scenario III

Alternative Scenario III aims at the capacity building and resource mobilization of the community engagement responsible parties in scopes of the existing legal framework. Additionally, Scenario III includes IAP2 Spectrum - the first level of engagement (Inform Phase) throughout the project cycle partially addressing the cause of the problem related to engagement limited to the EIA process only.

The figure below describes the four main blocks of the scenario III similar to the previous options while additionally having another block regarding informing the communities throughout the project cycle.

Figure 4: Alternative Scenario III

Human and Financial Resources	• Respective Position within the structure and proper job descriptions; allocated financial resources for the staff or outsourcing the expertise
Stakeholder Engagement Plan	• Guideline for Stakeholder Analysis and Engagement, division or roles , tailoring communication channels
Internal and External M&E	• Guideline for effective monitoring and evaluation tools and mechanism for internal as well as external monitoring
Training	• Training sessions for all stakeholders responsible for engagement or monitoring in newly developed standards for stakeholder analysis, engagement and M&E
Informing	• Informing the communities regarding the energy projects throughout the cycle of the project including the all project phases

The Informing phase is the first level of engagement of the Spectrum of Public Participation developed by the International Association of Public Participation (IAP2). The Spectrum includes five levels of engagement, while scenario III only consists of the first level. Informing level entails providing the stakeholders with balanced and objective information throughout the project, even though it is not a two-way process, it serves a solid basis for community engagement.

Alternative Scenario IV

Alternative Scenario IV aims at capacity building and resource mobilization for the community engagement in the scope of the existing legal framework. Additionally, the scenario IV includes full IAP2 Spectrum of engagement addressing one of the leading causes of the identified problem – lack of engagement throughout the project cycle.

The figure below describes the four main blocks of Scenario IV, similar to the previous options while additionally having another block regarding the Spectrum of Engagement.

Figure 5: Alternative Scenario IV

Human and Financial Resources	• Respective Position within the structure and proper job descriptions; allocated financial resources for the staff or outsourcing the expertise
Stakeholder Engagement Plan	• Guideline for Stakeholder Analysis and Engagement, division or roles, tailoring communication channels
Internal and External M&E	• Guideline for effective monitoring and evaluation tools and mechanism for internal as well as external monitoring
Training	• Training sessions for all stakeholders responsible for engagement or monitoring in newly developed standards for stakeholder analysis, engagement and M&E
IAP2 Spectrum of Engagement	• Choosing the engagement level of IAP2 Spectrum based on the risk assessment

The Scenario uses the principle of proportionality to select the level of effort for community engagement. The IFIs categorize projects based on environmental and social risks, mainly into three categories: 1. High-risk projects are Category A; 2. moderate risk projects are Category B, 3. low-risk projects are Category C. The same approach can be used for defining the risk level of the project. Once the risk level is identified, the level of engagement can be selected. The higher the risks, the higher the engagement level. The table below describes the project phases and some examples of engagement with the stakeholders based on the project risk.

Table 1: Project Cycles and Engagement Levels

	Projects With low or Minimal Risks	Projects with Moderate Risks	Controversial Projects / Significant Risks
Preliminary Development	Engaging with local government through interviews and information sharing	Engaging with local government and key informants through interviews and information sharing	Engaging with local government, stakeholder representatives and key informants through interviews and information sharing Stakeholder planning forum/workshop
Development / Implementation	Engaging with stakeholder representatives and key informants through interviews Public Meetings Grievance Mechanism	Engaging with stakeholder representatives and key informants through interviews and information sharing Public Meetings Open houses Grievance Mechanism	+ Engaging through Community Liaison Officers Full scale qualitative and quantitative studies
Operation and Maintenance	Open Houses Grievance Mechanisms	Annual/Quarterly consultations with Stakeholders Regular Studies	+ Participatory Monitoring/availability of the monitoring results
Decommissioning	Communicate the exit strategy to stakeholders Grievance Mechanism	+ Studies	+ Communicate impacts/ opportunities Model after decommissioning life in a participatory manner, alleviate fears.

5. ASSESSMENT OF ALTERNATIVE SCENARIOS

During the consultations with the stakeholders, alternative scenarios were elaborated through the economic, social and environmental impact lenses. The sub-chapters below describe the various impacts associated with alternative scenarios.

Economic Impacts

In the case of the Status Quo enforcement, the economic impact of the scenario is severe: the investors/developers might face financial implications as more time, money and human resources have to be spent on every single protester. Additionally, budgetary consequences are faced by the public authorities at different levels, as the reaction to the opposition often entails broadening the representation on the project site through high-level political figures or security (police, special forces). Economic impact through job creation is also hindered as the community opposition inhibits the business process, and the competitiveness of the business decreases.

In the case of the second scenario enforcement, administrative resources are increased and well managed due to the better distribution of the roles; thus, the risks are reduced. The scenario implies one-time direct costs for drafting guidelines. However, the scenario also might impose indirect costs such as aligning the structures of the agencies with the new requirements as per newly developed guidelines. Even though this scenario creates a friendlier environment for job creation, the competitiveness of the business is still expected to be lessened.

Enforcement of the third scenario directly affects the developer's costs and administrative burden. However, the business performing well in the communities becomes reputable, more attractive and competitive compared to others facing strong oppositions. The scenario similar to the previous one (scenario II) implies direct one-time costs for developing the guidelines and some indirect costs for business process optimization. Well managed process might result in decreased opposition and manageable process and have sustainable consequences on economic growth and employment.

Similarly, to Scenario III, direct and indirect costs of scenario IV are increased, although based on the project risks financial resources required for the engagement might be similar to the ones in scenario III. Low-risk projects might only require information campaign throughout the project cycle and the engagement required by the law at the EIA stage, although the costs might be higher if the project falls under medium or high-risk profiles. Both scenarios – III and IV increase the feasibility of the projects therefor the number of successful energy projects might increase. Implemented projects might lead to fair competition and as a result, affect the prices and the quality of the goods and services.

Social Risks

Even though the energy projects in the status quo scenario create jobs, the risk of suspending or cancelling the project creates unsustainable conditions for the employment. Also, increased opposition might lead to a highly stressful environment, physical injuries, and in some instances violation of property rights.

In the case of Scenario II, new jobs are created on the central and local government level, as the new guidelines require more expertise, competitiveness is increased. As the engagement becomes more meaningful, the community engagement process might become more constructive, but opposition and confrontation may still lead to health problems, such as stress, physical injuries, etc. The specific associated risk for the developers is that Public -Private Partnership (PPP) collaboration can take place even though the energy project might not be implemented. The same risk applies to scenarios III and IV, although the risk is not that high in the fourth scenario since the success rate is higher due to the improved engagement.

Similarly, to Scenario II, scenarios III and IV create more jobs as the compliance with guidelines requires to create additional jobs, as well as increases the competitiveness and expertise on the market. Well informed community experiences less stress and correspondently has broader acceptance for the project. However, the early spread of information regarding the potential project and the economic resettlement might cause speculations over land and other properties.

Environmental Impacts

None of the scenarios has direct environmental impacts as they are mainly focused on capacity development, financial resource mobilization and community engagement exercises. The

environmental impacts before, during or after the energy projects implementation is beyond the scope of the current assignment.

The table below lists the economic, social, and environmental impacts of the scenarios.

Table 2: Economic, Social and Environmental Risks of the Alternative Scenarios

Impact Categories	Key Impacts	Status Quo	Scenario II (*Improved Implementation of Existing Regulation*)	Scenario III (*Improved Engagement during EIA*)	Scenario IV (*Meaningful Consultation and Participation throughout Project Cycle*)
Economic	**Operating costs and conduct of business**	Poor implementation of community participation in the energy projects limited only to the specific means of engagement and on a particular phase of the project, the process can be characterized as transactional, as more resources have to be spent on single community protesters. The process will lead to a more vigorous opposition, imposing the increased direct and indirect cost of the project implementation, as well as the increased time and human resources.	As the administrative resources are increased (human and financial) and well managed due to the better distribution of the responsibilities and clear roles, the risks are reduced. Correspondently smaller deviation in direct and indirect costs is anticipated.	The direct costs are clearly increased on the developers' side, as the scenario implies the additional human resources. It also requires the information campaigns throughout the whole lifecycle of the project implementation, and therefore the direct costs are increased. An additional indirect effect of the alternative regarding the impact on new business acceleration, it will definitely create more expertise on the market, as well as new actors.	The direct costs are increased on the developers' side in cases of intermediate-risk and high-risk level projects, as the alternative implies the additional human resources. It also requires the information campaigns throughout the whole lifecycle of the project implementation; therefore, the direct costs are increased. As for the projects with a low-risk level, the costs might not increase. An additional indirect effect of the alternative regarding the impact on new business acceleration, it will definitely create more expertise on the market, as well as new actors.
	Administrative burdens on businesses	Not affected.	Not affected.	The administrative burden on business is increased as the developers are obliged to develop a Stakeholder Engagement Plan and a Community Grievance Mechanism with related monitoring systems according to the predefined guidelines and report within the proposed timeframe.	The administrative burden on business is increased as the developers are obliged to develop a Stakeholder Engagement Plan and a Community Grievance Mechanism with related monitoring systems according to the predefined guidelines and report within the proposed timeframe.
	Competitiveness	Business competitiveness lessens as the business processes are hindered due to strong community oppositions.	Business competitiveness lessens as the business processes are hindered due to strong community oppositions.	The business performing well in the communities becomes reputable, more attractive and competitive compared to others facing strong oppositions.	The business performing well in the communities becomes reputable, more attractive and competitive compared to others facing strong oppositions.

Impact Categories	Key Impacts	Status Quo	Scenario II (*Improved Implementation of Existing Regulation*)	Scenario III (*Improved Engagement during EIA*)	Scenario IV (*Meaningful Consultation and Participation throughout Project Cycle*)
	Public authority budgets and management	This scenario has continuous budgetary consequences for public authorities at different levels. As the given alternative limits the forms and timeframe for the community engagement in the energy projects, conflicts and opposition are the typical scenarios for the communities to react. The authorities either chose to broaden/increase representation on site, mainly via high-level political figures from the ministries or local self-governments visiting the communities or via security methods to manage the opposition, involving Police or Special military forces.	This scenario has the one-time budgetary consequences for public authorities at different levels. On both – central and municipality levels, additional human resources are required. The alternative also implies the capacity building for the administrative bodies. The one-time direct cost is also required for the preparation of the guidelines. Some direct and indirect costs might also be required for the business process optimization due to the new guideline requirements. For example- the changes might be needed in DocFlow system, etc.	This scenario has the one-time budgetary consequences for public authorities at different levels. On both – central and municipality levels, additional human resources are required. The alternative also implies the capacity building for the administrative bodies. The one-time direct cost is also required for the preparation of the guidelines. Some direct and indirect costs might also be required for the business process optimization due to the new guideline requirements. For example- the changes might be needed in DocFlow system, etc.	The alternative has the one-time budgetary consequences for public authorities at different levels. On both – central and municipality levels, additional human resources are required. The alternative also implies the capacity building for the administrative bodies. The one-time direct cost is also required for the preparation of the guidelines. Some direct and indirect costs are also anticipated for the business process optimization due to the new guideline requirements. For example- the changes might be needed in DocFlow system, etc.
	Consumer energy prices and services	Not affected.	Not affected.	The alternative might have a positive effect on the prices, quality and availability or choice of consumer goods and services. As the alternative reduces the risks of the project implementation by improving community participation/engagement, the number of successful energy projects might increase. The increased number of energy projects will lead to fair competition and as a result, affect the prices and the quality of the goods and services.	The alternative might have a positive effect on the prices, quality and availability or choice of consumer goods and services. As the alternative reduces the risks of the project implementation by improving community participation/engagement, the process of the project implementation will be more feasible; therefore, the number of successful energy projects will increase. The increased number of energy projects will lead to fair competition and as a result, affect the prices and the quality of the goods and services.

Impact Categories	Key Impacts	Status Quo	Scenario II (*Improved Implementation of Existing Regulation*)	Scenario III (*Improved Engagement during EIA*)	Scenario IV (*Meaningful Consultation and Participation throughout Project Cycle*)
	Local economic development	Few jobs and small businesses are created due to the high risks of conflicts and opposition to the projects, resulting in contractors bringing in their own personnel or postponed or cancelled projects. Local economic development is not realized.	New jobs are created, as well as new small businesses are created.	New jobs are created, as well as new small businesses are created.	New jobs are created, as well as new small businesses are created. Due to the improved community engagement and a better match between local skills and local business needs and skills training the success chances for the projects is higher, resulting in more sustainable local economic development.
	Macroeconomic environment	The alternative has positive consequences on economic growth and employment.	The alternative has clear positive consequences on economic growth and employment.	The alternative has sustainable consequences on economic growth and employment.	The alternative has sustainable consequences on economic growth and employment.
Social	**Employment**	Jobs are created due to energy projects.	As the regulatory framework is more precise and requires more active participation from the administrative bodies, new jobs are created on the central and local government administrative level. As the regulatory demands from the state becomes more precise, more expertise is required, there for the new jobs are created.	As the regulatory framework is more precise and requires more active participation from the administrative bodies, new jobs are created on the administrative level. As the regulatory demands from the state become more precise and stricter, more expertise is required, therefore the new jobs are created.	As the regulatory framework is more precise and requires more active participation from all parties involved: administrative bodies, central and municipal governments, business, new jobs are created. As the regulatory demands from the state become more precise and stricter, more expertise is required, therefore the new jobs are created.
	Effects on income	Public-Private Partnerships are the common forms of collaboration for the parties involved in this process. Public goods and services are often supplied within the PPP.	Public-Private Partnerships are the common forms of collaboration for the parties involved in this process. Public goods and services are often supplied within the PPP. The associated risk for the developers is that PPP collaboration can take place	Public-Private Partnerships are the common forms of collaboration for the parties involved in this process. Public goods and services are often supplied within the PPP. The associated risk for the developers is that PPP collaboration can take place	Public-Private Partnerships are the common forms of collaboration for the parties involved in this process. Public goods and services are often supplied within the PPP. The associated risk for the developers is that PPP collaboration can take place even though the energy project might not be implemented. The risk is not high as the success rate is higher due to the improved engagement.

Impact Categories	Key Impacts	Status Quo	Scenario II (*Improved Implementation of Existing Regulation*)	Scenario III (*Improved Engagement during EIA*)	Scenario IV (*Meaningful Consultation and Participation throughout Project Cycle*)
	Governance, participation and good administration	Not affected.	The implementation of the proposed measures affects public institutions and administrations, in regard to their responsibilities for the monitoring process.	The implementation of the proposed measures affects public institutions and administrations, in regard to their responsibilities for the monitoring process. As the alternative implies to apply the community engagement methods throughout the whole project implementation cycle, it has an impact on all parties involved.	The implementation of the proposed measures affects public institutions and administrations, in regard to their responsibilities for the monitoring process. As the alternative implies to apply the community engagement methods throughout the whole project implementation cycle, it has an impact on all parties involved.
	Public health and safety and health systems	Opposition and confrontation may lead to stress, physical injuries, etc.	Opposition and confrontation may lead to stress, physical injuries, etc.	Well informed community experiences less stress and correspondently has broader acceptance for the project.	Well informed and engaged community experiences less stress and correspondently has broader acceptance for the project.
	Property rights and the right to conduct a business.	Due to the poor engagement the property rights might be violated.	As the engagement becomes more meaningful, the process will be more constructive.	As the engagement becomes more meaningful, the process will be more constructive. However, the early spread of information regarding the potential project and the economic resettlement might cause speculations over land and other properties.	As the engagement becomes more meaningful, the process will be more constructive. However, the early spread of information regarding the potential project and the economic resettlement might cause speculations over land and other properties.
Environmental	**Air quality**	Not affected.	Not affected.	Not affected.	Not affected.
	Water quality and resources	Not affected.	Not affected.	Not affected.	Not affected.
	Biodiversity, flora, fauna and landscapes	Not affected.	Not affected.	Not affected.	Meaningful engagement might help hazards for biodiversity to decrease.
	Soil quality or resources	Not affected.	Not affected.	Not affected.	Not affected.
	Efficient use of resources	Not affected.	Not affected.	Not affected.	Not affected.
	Land use	Not affected.	Not affected.	Not affected.	Not affected.

The multi-criteria analysis was leveraged for scenario comparison. Each of the listed impacts is assessed against several criteria, such as reaching the objectives, results and feasibility. The impacts were assessed as low, medium and high. The table below describes the assessment of each scenario against the criteria.

Table 2. Multi-Criteria Analysis of the Alternative Scenarios

Criteria	Scenario I	Scenario II	Scenario III	Scenario IV
Negative Economic impact	High	Medium	Medium	Medium/High
Negative Social impact	Low	Medium	Medium	High
Negative Environmental impact	Low	Low	Low	Low
Effectiveness in achieving objective 1 / Engagement throughout the project cycle	Low	Low	Medium	High
Effectiveness in achieving objective 2/ Proper financial and human resources	Low	High	High	High
Effectiveness in achieving objective 3/External and Internal M&E	Low	High	High	High
Effectiveness in achieving objective 4/Inclusive Engagement	Low	High	High	High
Effectiveness in achieving objective 5/Increased Accessibility to project information	Low	High	High	High
Effectiveness in achieving objective 6/Multiple ways of Engagement	Low	High	High	High
Political feasibility	High	Medium	Medium	Low
Technical feasibility	High	Medium	Medium	Low

Even though in terms of achieving the objectives forth scenario performs the best, it political and technical feasibility is low. Closest to attaining all the objectives, having medium economic risks, as well as political and technical feasibility, is the scenario III.

6. RECOMMENDATIONS

The assessment of the alternative scenarios reveals that the balance between reaching objectives and economic impacts is reached in Scenario III.

The Scenario III focuses on the mobilization of financial and human resources and capacity development through guidelines development and trainings to ensure meaningful consultation at the EIA stage. Also, the scenario aims at practicing community engagement at all phases of the project development by community awareness. Interviews with stakeholders show that the implications of the scenario are the legal basis of their implementation. Therefore, if recommendations are not reinforced thought a legal basis, the results and impacts are anticipated to be disputable. It is also worth noting, that although the scenario implied mobilization of financial and human resources at the central and local governmental levels, stakeholders highlighted the importance of increasing the role of the developer and investor in the community engagement process. The proper distribution of roles can be achieved though stakeholder engagement plan for each separate energy project.

The working group has developed recommendations for enforcing scenario III.

Recommendation I - Human and Financial Resources

It is crucial to ensure that units responsible for community engagement in central and local governments have appropriate financial and human resources for meaningful engagement with the community. A respective position for a Community Engagement Specialist has to be created within the units with a clear job description to select a suitable person with the required background and skillset to perform assigned tasks. Mobilization of financial resources implies allocating budget not only for additional staff, but also for the engagement process. Stakeholder analysis should identify the sub-groups of the communities and based on their needs tailor customer friendly means and channels with sufficient financial support.

In case the engagement process is led by the developer/investor, the central and local government units, responsible for community engagement, need to be equipped with adequate skills and capacity to monitor and evaluate the process.

In case the units are unable to create a position of the community engagement specialist, outsourcing the expertise should be an option. Outsourcing can also be split into actually leading the process of engagement or monitoring and evaluation of the process of engagement led by the developer/investor.

Recommendation II - Stakeholder Engagement Analysis and Plan

Guidelines for Stakeholder Analysis, based on the best international practice, are highly recommended. Stakeholder Analysis should be performed at the initial stages of the project development and updated and revised thought the lifecycle of the project. The units responsible for stakeholder engagement should have financial and human resources to perform the analysis or have funds to outsource the task.

The stakeholder analysis must ensure that the community is adequately defined and all sub-groups of the community are considered in the process. Stakeholder Analysis should also map all the respective parties of the project with clearly distributed roles and responsibilities. The stakeholder analysis process should be accurately explained in the Stakeholder Engagement Plan, which guides the process. The plan must be the subject of constant monitoring, evaluation and revision throughout the project cycle.

The stakeholder analysis process should identify all sub-groups of communities, select and tailor communication channels and define the frequency and means of communication, including the accessibility of project relevant information.

Recommendation III - Internal and External Monitoring and Evaluation Mechanisms

The creation of Guidelines for effective internal and external monitoring and evaluation mechanisms is essential. The stakeholder engagement plan should include monitoring and evaluation mechanisms that regularly check the effectiveness of the process and advise on revising the plan.

It is important to ensure both internal and external monitoring and evaluation process. Based on the stakeholder engagement plan and distribution of the roles and responsibilities, internal and external

monitoring and evaluation process can be distributed among central and local government levels, investor/developer and NGOs, community representatives.

Recommendation IV – Training and Capacity Building

Capacity building of the central and local government units responsible for the community engagement, communities and NGOs is essential. The tailored trainings need to create the required expertise to ensure that trained personnel are capable of performing accomplished stakeholder analysis, drafting practical stakeholder engagement plan and effectively monitoring and evaluating the process.

Recommendation V – Informing Phase

The informing phase has to ensure information flow regarding the energy project throughout the project cycle; thus, it is crucial to have adequately selected communication strategy with respective communication channels and instruments serving long-term goals. Substantial engagement of local communities, requires choosing the following options in view regional specifications:

- Communication channels;
- Timing of commencement of communication;
- Language, contents, terminology of providing information.

The stakeholder engagement plan should define all the above-listed parameters of informing process based on the stakeholder analysis. The stakeholder analysis, through qualitative and quantitative studies, should identify the most effective timing, channels and accessibility of the communication contents for community subgroups. The informing phase should be carefully planned to avoid possible speculations over the property (land registration, illegal uses of the land in the investment area).

ANNEX 1. STAKEHOLDER CONSULTATIONS

First Cycle of Consultations			
Stakeholder Group	**Name**	**Title**	**Date**
Government Organizations			
Ministry of Economy and Sustainable Development of Georgia (MoESD)	David Chachkiani	Energy Policy and Investment Projects Department/ Head of Division	08.04.2020
Georgian Energy Development Fund (GEDF)	George Chikovani	CEO	20.03.2020
GEDF	Anuki Batiashvili	Adviser of CEO	20.03.2020
Georgian State Electrosystem (GSE)	Vladimer Giorgazde	Head of Environmental, Social Affairs and PermissionDepartment	22.04.2020
Electricity Market Operator (ESCO)	Mikheil Tavberidze	Deputy Director	23.03.2020
Georgian National Energy and Water Supply Regulatory Commission (GNERC)	Maia Melikidze	Commissioner	23.03.2020
MEPA	Maiko Beradze	Head of the Environmental Impact Permits Department	27.03.2020
Public-Private Partnership Agency (PPP Agency)	Levan Batiashvili	Head of Unit, Public-Private Partnership Center	08.04.2020
Funds			
Georgian Renewable Energy Development Association (GREDA)	Giorgi Abramishvili	CEO	14.04.2020
Developers			
Nenskra Hydro	Ana Magradze Ana Dolidze	CIP Coordinator Environmental Law Manager	21.04.2020
Gori Wind Power / GEDF	Nugzar Khaindrava	Projects Manager	19.03.2020
Bakhvi Dam	Giorgi Abramishvili	CEO	14.04.2020
Consulting Companies			
Gross Energy Group	Zurab Tsomaia		10.03.2020
GAMMA Consulting	Zurab Mgaloblishvili Juguli Akhvlediani	Director	14.03.2020
Media			
Publika	Natia Amiranashvili	Journalist	03.04.2020
TV 1 / BMG	David Jalagonia Shota Tkeshelashvili	Journalist Journalist	14.04.2020
NGOs			
Caucasus Environmental NGO Network (CENN)	Rezo Getiashvili	Environmental Projects Coordinator	31.03.2020
Green Alternative	Manana Kochladze	Director of Green Alternative	01.04.2020
WEG	Murman Margvelashvili	Managing Partner	31.03.2020
Local Government			
Adjara	Shuakhevi Khulo Keda	Deputy Mayor, Khulo Aslan Shainidze	30.04.2020
Adjara	Shuakhevi Khulo Keda	Khulo, Gurta	30.04.2020
Second Cycle of Consultations			
GEDF	Anuki Batiashvili	Adviser of CEO	24.06.2020
GEDF	Giorgi Chikovani	CEO	24.06.2020
GREDA	Giorgi Abramishvili	CEO	24.06.2020
Cebrerus Frontier	Mikheil Nibladze	Managing Director	24.06.2020
Gori Wind Power / GEDF	Nugzar Khaindrava	Projects Manager	24.06.2020
GAMMA Consulting	Zurab Mgaloblishvili Juguli Akhvlediani	Director	26.06.2020
Gross Energy Group	Sophio Chichagua	Deputy General Director	26.06.2020
DG Consulting	Maia Batsatsashvili	Environmental Specialist	26.06.2020
CENN	Rezo Getiashvili	Environmental Projects Coordinator	03.07.2020

MoESD	Marita Arabidze	Deputy Head of Energy Policy Departament	07.07.2020
MoESD	Anna Maisuradze	Acting Head of Division of International Relations in Energy Sector	07.07.2020
MoESD	Tornike Kazarashvili	Head of Energy Policy and Projects Development Department	07.07.2020
MoESD	Zaza Chikhradze	Head of Energy Reforms and International Relations Department	07.07.2020

ANNEX 2. CONSULTATION GUIDE

თემების ენერგო პროექტებში ჩართულობის სტანდარტების რეგულაციების გავლენის შეფასება
სახელმძღვანელო დაინტერესებული მხარეებისათვის
მთავრობის წარმომადგენლები

მოგესალმებით, მე გახლავართ (სახელი, გვარი), PMCG Deloitte-სა და USAID დაფინანსებით ახორციელებს თემების ენერგო პროექტებში ჩართულობის სტანდარტების რეგულაციების გავლენის შეფასებას. აღნიშნული დავალების ფარგლებში მოხდება ენერგო პროექტებში თემების ჩართულობის პრობლემის იდენტიფიცირება, განისაზღვრება და შეფასდება თემების პროექტებში ჩართულობის რამდენიმე სცენარი დაინტერესებული მხარეების ჩართულობით და შერჩეულ სცენარზე დაყრდნობით შეიქმნება თემების ჩართულობის სტანდარტები. დღევანდელი ინტერვიუს/კონსულტაციის მიზანია შეისწავლოს თემების ჩართულობის კუთხით არსებული მდგომარეობა, გამოყენებული პრაქტიკები, დაშვებული შეცდომები თუ სამომავლო გეგმები ამ მიმართულებით. ინტერვიუ/კონსულტაცია დაახლოებით 50-60 წუთი გაგრძელდება, თქვენი მონაწილეობა ნებაყოფლობითია და თქვენ უფლება გაქვთ არ გასცეთ თქვენთვის არასასურველ ნებისმიერ კითხვას პასუხი. ასევე, აღსანიშნავია, რომ თქვენი მონაწილეობა, როგორც ჩართული და დაინტერესებული მხარის ძალიან მნიშვნელოვანია.

ინტერვიუს/კონსულტაციის მიმდინარეობისას განხორციელდება აუდიო ჩანაწერი, რათა არ მოხდეს მოწოდებული ინფორმაციის დაკარგვა ან დამახინჯება. აუდიო ჩანაწერი მხოლოდ პროექტში დასაქმებული ხალხისათვის იქნება ხელმისაწვდომი და პროექტის დასრულების შემდეგ განადგურდება.

შესავალი

გთხოვთ, გვითხრათ თქვენი სახელი და გვარი და მოკლედ თქვენი პოზიციისა და/ან საქმიანობის შესახებ.

ზოგადი შეფასება

10 ქულიან სკალაზე (სადაც 1 ნიშნავს სრულებით არ არიან, ხოლო 10 ნიშნავს მაქსიმალურად არიან ჩართულები), რამდენად ჩართულები არიან თემები ენერგო პროექტებში?

10 ქულიან სკალაზე (სადაც 1 ნიშნავს სრულებით არა, ხოლო 10 ნიშნავს მაქსიმალურად უნდა იყვნენ ჩართულები), რამდენად უნდა იყვნენ თემები ენერგო პროექტებში? რატომ?

საკანონმდებლო აქტების დონეზე მოქალაქეთა ჩართულობის მექანიზმების შეფასება

რამდენად არის ენერგო პროექტის განხორციელების დროს მოქალაქეთა ჩართულობის ვალდებულება დღევანდელი კანონდებლობის შესაბამისად? რა არის საკვანძო რეგულაციები, რომლებიც უზრუნველყოფენ/განსაზღვრავენ მოქალაქეთა ჩართულობას/ჩართულობის პროცესს/ფორმებს?

რამდენად ერგება აღნიშნული კანონმდებლობა/რეგულაციები ენერგო სექტორს? არსებობს თუ არა ენერგო პროექტებისთვის განსაკუთრებული რეგულაციები? (ენერგეტიკისა და ბუნებრივი გაზის შესახებ ახალი კანონი რამდენად ითვალისწინებს მოქალაქეთა ჩართულობას?) უნდა არსებობდეს თუ არა? რატომ?

გარემოსდაცვითი შეფასების კოდექსში ვკითხულობთ ასეთ ჩანაწერს: *მუხლი 31. ადმინისტრაციული ორგანოს მოვალეობები: "ამ კოდექსით გათვალისწინებული უფლებამოსილი ადმინისტრაციული ორგანო ვალდებულია: ა) უზრუნველყოს გადაწყვეტილების მიღების პროცესში, შეძლებისდაგვარად ადრეულ ეტაპზე (როდესაც შესაძლებელია საზოგადოების ეფექტიანი მონაწილეობა), საზოგადოების მონაწილეობა ამ თავის შესაბამისად;* რამდენად საკმარისია აღნიშნული ჩანაწერი საზოგადოების ჩართულობის უზრუნველყოფის კუთხით? რატომ?

ენერგო პროექტების განხორციელების პროცესში რომელ ეტაპზე არიან ან არ არიან ჩართული მოალაქეები და სად არის მათი ჩართულობის ყველაზე დიდი დეფიციტი? რატომ?

არსებობს თუ არა რაიმე პროცედურა, რომლის საფუძველზე ხდება საზოგადოებრივი ინტერესის დადგენა ამა თუ პროექტის მიმართ? ხდება თუ არა საზოგადოებრივი აზრის გათვალისწინება პროექტების დაგეგმვისას?

თემების ჩართვა რა ფორმით ხდება? არსებობს თუ არა ფორმების შესახებ რაიმე მოთხოვნა/რეგულაცია? უზრუნველყოფს თუ არა ჩართულობის ეს ფორმები რეალურ/შინაარსის მქონე ჩართულობას? რითი იზომება „შინაარსიანი“ ჩართულობა? მზად არის თუ არა ზოგადად ადგილობრივი თემები/ზემოქმედების ქვეშ მოქცეული თემები/დაინტერესებული თემები ჩაერთონ პროექტის სხვადასხვა ეტაპზე? რატომ?

ჩვენი რეგულაციებიდან გამომდინარე ვისი "ტვირთია" მოქალაქეთა ჩართულობის უზრუნველყოფა? ვის ეხება ჩართულობის მონიტორინგი? დარღვევების შემთხვევაში ხდება თუ არა რეაგირება? შეგიძლიათ რაიმე მაგალითის გახსენება, როდესაც მსგავსი რამ მოხდა? როგორ დასრულდა შემთხვევა?

ენერგო პროექტების განხორციელების პროცესში არსებული ბარიერები

ზოგადად, ენერგო პროექტები რა სახის ბარიერების წინაშე დგას? რა არის მათი გამოწვევის მიზეზი? რა გავლენა აქვთ ამ ბარიერებს პროექტების განხორციელებაზე?

ენერგო პროექტების განხორციელების პროცესში ძირითადად რა პრობლემები იჩენს თავს? რამდენად მნიშვნელოვანია ეს პრობლემები? რამდენად უშლის ხელს პროექტის განხორციელებას? როგორ შეიძლება მათი მოგვარება? ყველაზე მეტად ვის აზარალებს ეს პრობლემები და ვინ უნდა გადაჭრას/მოაგვაროს ეს პრობლემები?

ზოგადად თუ გახსენდებათ შემთხვევა, როდესაც თემთა პროტესტის ან ინტერესთა კონფლიქტის გამო მოხდა პროექტის დაგვიანება ან შეჩერება? შეგიძლიათ უფრო დეტალურად გაიხსენოთ ეს შემთხვევები? დაგვიანების შემთხვევაში როგორ აისახა ეს პროექტის საბოლოო განხორციელებაზე ვადების, ფინანსების ან სხვა რესურსების კუთხით? შეწყვეტის შემთხვევაში როგორ აისახა ზოგადად სექტორზე, სახელმწიფოზე, სხვა დაინტერესებულ მხარეებზე? შეგვიძლია შეჩერების ან შეწყვეტის შედეგად დამდგარი შედეგის ფინანსურ ან სხვა ტიპის მაჩვენებლებში გადატანა? მაგ. დაგვიანების შემთხვვაში პროექტის ადმინისტრაციული ხარჯი გაიზარდა N-ჯერ, ან საჭირო გახდა დამატებითი ფინანსური ან ადამიანური რესურსების მობილიზება, ა.შ.

თქვენი აზრით,შეიძლებოდა თუ არა თემებთან არსებული კონფლიქტების თავიდან არიდება? როგორ? ვინ არის ამაზე პასუხისმგებელი? არსებული გამოცდილებიდან გამომდინარე, იცვლება თუ არა მიდგომა შემდგომი პროექტების განხორციელებისას? რატომ? რა არის საჭირო იმისათვის, რომ წარსული გამოცდილება გაზიარდეს?

ენერგო პროექტების დაინტერესებული მხარეები

ვინ არიან დაინტერესებული მხარეები? დაინტერესებულ მხარეებში შედის თუ არა თემი? ერთნაირია თუ არა თემთან და სხვა დაინტერესებულ მხარეებთან კომუნიკაციის მიზანი, ხარისხი, სიხშირე?

ზოგადად როგორ განისაზღვრება თემი? როდესაც თემის ჩართულობაზე ვსაუბრობთ მოიაზრება თუ არა თემში გენდერული სპეციფიკა ან სხვადასხვა უმცირესობები? რა უზრუნველყოფს მათ ჩართულობას?

რა მიზნით ხდება თემის ჩართვა? რა ევალება თემს? რა ევალება პროექტის განმახორციელებელს? ხდება თუ არა ამ მოვალეობების პირნათლად შესრულება?

რა შეიძლება იყოს თემის ჩართულობის ბარიერი? რატომ უნდა უნდოდეს თემს ჩართულობა? რატომ შეიძლება არ ერთვებოდეს თემი პროექტში?

ამბობენ, რომ თემების ჩართულობა ფორმალურ მხარეს ატარებს და კონსულტანტები ხშირად საუბრობენ „შინაარსიან/meaningful” კონსულტაციებზე, თქვენი აზრით, რამდენად ატარებს თემების ჩართულობა დღეს ფორმალურ ხასიათს და როგორ უნდა გახდეს ის უფრო „ შინაარსიანი“?

რა დოზით მონაწილეობს თემი პროექტების ზემოქმედების ქვეშ მოქცეული მიწის აღწერისას? დემარკაციის დროს? როგორ ხდება დაურეგისტრირებელი მიწების მართვა, მონაწილეობს თუ არა თემი მიწის აღიარების კომისიაში?

რამდენად ჩართულია თემი გარემოს დაცვის საკითხებში? რა სახით არის ჩართული? რა სახით უნდა იყოს ჩართული? რატომ?
ვის ინტერესებს ემსახურება თემების ჩართულობა? რატომ?

რა ხდება კონფლიქტების/საჩივრები მოგვარების ეტაპზე? რამდენად მონაწილეობრივია პროცესი? რა შეიძლება გამოსწორდეს ამ მიმართულებით, რატომ?

რა შედეგის მოტანა შეუძლია თემების ჩართულობას პროექტებისათვის? რატომ? რა შედეგი მოაქვს დღეს თემების ჩართულობას? შეიძლება თუ არა არსებული მდგომარეობის გამოსწორება? როგორ?

რას ნიშნავს თემის წარმატებული ჩართულობა პროექტებში? რამდენად შორს არის დღევანდელი მდგომარეობა წარმატებულისგან? რატომ?

ენერგო პროექტების კომუნიკაცია

ზოგადად, ხდება თუ არა პროექტის შესახებ თემების ცნობიერების ამაღლება პროექტთან დაკავშირებით? საჭიროა თუ არა პროექტის მედია კამპანია? რატომ?

როგორ ხდება ადგილობრივი შეხვედრების დანიშვნა? როგორ/ რა გზებით მიეწოდება ინფორმაცია თემს შეხვედრის შესახებ? საკმარისია თუ არა გამოყენებული რესურსები? რამდენი ხნით ადრე ხდება შეტყობინების გაგზავნა? ადეკვატურია თუ არა გამოყოფილი დრო? რატომ?

რა შეიძლება შეიცვალოს ამ მიმართულებით? უზრუნველყოფს თუ არა დღევანდელი პრაქტიკით დანიშნული შეხვედრები/საჯარო განხილვები თემის ყველა ჯგუფის/უმცირესობის ჩართულობას? როგორ უნდა მოხდეს სხვადასხვა ჯგუფების ჩართულობა? სად არის პრობლემა სხვადასხვა ჯგუფების ჩართვისას - ინფორმაციის მიწოდების ეტაპზე თუ უშუალოდ ჩართულობის ეტაპზე?

როგორ ხდება თემის მიერ პროექტის დოკუმენტაციის გაცნობა? რა არის მიზეზი იმისა, რომ თემი არ იცნობს პროექტის დოკუმენტაციას? როგორ შეიძლება პროცესი გახდეს უფრო ინტერაქტიული/მონაწილებრივი? სჭრიდებოდა თუ არა პროექტის დოკუმენტაციას თემის დასტური? უნდა სჭირდებოდეს თუ არა პროექტის დოკუემნტაციას თემის დასტური? რატომ?

შეჯამება

საჭიროა თუ არა თემის არსებული მდგომარეობასთან შედარებით მეტი ან ნაკლები ჩართულობა? რატომ? რა მექანიზმებით უნდა იქნეს უზრუნველყოფილი ნაკლები ან მეტი ჩართულობა? რა არის საჭირო ამ მექანიზმების ამუშავებისათვის? ვინ უნდა უწევდეს მონიტორინგს/ კონტროლს ამ პროცესს?

რამის დამატება ხომ არ გინდათ?

დიდი მადლობა

ANNEX 3: DESK REVIEW OF EXISTING GEORGIAN REGULATORY FRAMEWORK, RELEVANT EU DIRECTIVES, AND STANDARDS FOR THE INTERNATIONAL MARKET FOR NEW DEVELOPMENT ENERGY PROJECTS

Attached as a separate file.

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