



**Bakhvi HPP**

# **Stakeholder Engagement Plan**

## **Bakhvi 2 HPP**

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Abbreviations	Definition
Holding	Caucasus Clean Energy Holding
HPP	Hydro Power Plant
GWh	Gigawatt-Hour
kV	Kilovolt
ESG	Environmental, Social and Governance
ESMS	Environmental and Social Management System
SEP	Stakeholder Engagement Plan
H&S	Health and Safety
KPI	Key Performance Indicators
NGO's	Non-Governmental Organization's
PAC	Project Affected Community
IFC	International Financial Corporation
EIB	European Investment Bank

## **1. Information about Bakhvi 2 HPP**

Bakhvi 2 HPP is a hydropower plant located on the Bakhvistkali River in Guria Region, Ozurgeti Municipality, Georgia. Bakhvi 2 HPP comprises two run-of-river hydropower plants, Bakhvi 2A HPP and Bakhvi 2B HPP, with two intake structures, two buried pressure pipelines, and two powerhouses, integrated through a mutual grid connection solution. The total installed capacity of Bakhvi 2 HPP is 35.4 MW, consisting of 11.6 MW for Bakhvi 2A and 23.8 MW for Bakhvi 2B, with an expected annual generation of approximately 134.3 GWh, including 45.5 GWh from Bakhvi 2A HPP and 88.8 GWh from Bakhvi 2B HPP. The generated electricity is connected to the national grid through a 35 kV transmission line and associated substation infrastructure.

The closest villages to the area include Ukanava, Mtispiri, Vaniskedi, and Okroskedi. Both hydropower plants are located within the administrative territory of Ozurgeti Municipality, Guria Region.

Bakhvi 2 HPP maintains routine generation and maintenance activities. Although community interaction has significantly decreased compared to the construction phase, Bakhvi 2 HPP remains committed to maintaining open, accessible, and transparent communication with local stakeholders.

Implementation of this Plan supports compliance with applicable national legislation, environmental permit conditions issued for the Bakhvi 2 Hydropower Plant, and relevant international environmental and social standards, including the requirements of the International Finance Corporation (IFC) and the European Investment Bank (EIB) related to stakeholder engagement and transparency.

The Plan is implemented in coordination with other environmental and social management plans developed under the ESMS, including the Community Liaison Implementation Plan and the grievance mechanism procedures.

### **1.1. Objectives**

The objectives of the SEP are to ensure that relevant and accessible information regarding the Bakhvi 2 HPP is communicated to stakeholders who may be interested in or affected by HPP activities.

The Plan also aims to establish clear procedures for receiving and considering stakeholder feedback, questions, and concerns related to the environmental and social performance of the HPP.

In addition, the SEP incorporates a grievance mechanism that provides stakeholders with an accessible channel for submitting concerns or complaints and enables the HPP to address such issues in a timely and transparent manner.

## **2. Roles and Responsibilities**

Roles and responsibilities for the implementation of this Stakeholder Engagement Plan during the operational phase of the Bakhvi 2 HPP are defined as follows:

The Company Director ensures that adequate organizational support and resources are available for effective implementation of the Stakeholder Engagement Plan. The Company Director is responsible for reviewing

material stakeholder-related issues escalated by the ESG Manager, supporting their timely resolution, and ensuring that significant matters are reported to the Holding and, where relevant, to the Supervisory Board.

The Company ESG Manager is responsible for coordinating and supervising stakeholder engagement activities at the HPP level and for ensuring that engagement processes are implemented in accordance with the ESMS.

The Holding ESG and Sustainability Lead is responsible for overall oversight of the SEP.

To support accountability and effective implementation of the Stakeholder Engagement Plan during operations, the following monitoring and management measures are applied:

1. Key performance indicators (KPIs) related to stakeholder engagement are monitored on a periodic basis. These include grievance resolution rate (percentage of grievances resolved within 30 days), participation levels in stakeholder meetings where conducted, and stakeholder satisfaction indicators where applicable;
2. The grievance management procedures and complaint forms support monitoring of grievance handling processes, responsibilities, and response timelines.
3. ESG performance related to stakeholder engagement is reviewed periodically, including quarterly internal ESG reviews. The results of these reviews are documented in internal meeting records.

Based on monitoring results, stakeholder feedback, and operational observations, the ESG Manager prepares proposed updates or amendments to the SEP where necessary. Proposed revisions are communicated to the Holding ESG and Sustainability Lead for approval and subsequent implementation within the ESMS framework.

### **3. Compliance Framework**

#### **3.1. Legal Requirements of Georgia**

The Constitution of Georgia (1995) guarantees public access to information and the right of individuals to obtain full, unbiased and timely information about their working and living environment. In the context of the Power Plant, the Georgian legislation presently rules only the stakeholder engagement activities related to the environmental permitting process: as of 2018, there are no legal requirements applicable to the construction or operation phase.

With the progressive integration of the EU legislation into the Georgian legislation, the Power Plant is likely to see new stakeholders with whom it will have to engage, such as the basin agencies. The SEP will for that reason be updated on an annual basis.

#### **3.2. International Financing Institutions Requirements**

The HPP is subject to IFC Performance Standards and to EIB Environmental and Social Standards.

These standards can be summarised as follows:

Stakeholder consultation as an ongoing process continuing throughout the life of the Hydro Power Plant.

Stakeholder engagement involves:

1. stakeholder identification
2. proactive stakeholder engagement

3. availability of a grievance mechanism openness to all stakeholders
4. regular monitoring

## 4. Stakeholders

### 5.1 Categories of stakeholders

The HPP stakeholders include all people who have a direct or indirect interest in relation with the HPP:

Local stakeholders:

- Community members; ;
- Local business holders;

Parties affected by the Hydro Power Plant:

- Neighboring communities
- Land or natural resources users (pastureland, forest) Ecosystem services users

River and water users:

- Fishermen
- River water consumers

Government and local authorities:

- Municipality representatives
- Central Governmental authorities (and their regional branches) involved in authorizations, permits, and inspections: Ministry in charge of Environment, Energy, Regional Development and Infrastructure  
Technical services: GSE, Energo-Pro
- Police
- Civil security, first aid and medical services

Civil society organizations:

- Local civil society organizations
- Local NGOs

Media:

- Local Journalists
- Local Newspapers
- Local online informational portals

Employment:

- Personnel hired by the Hydro Power Plant

Third-parties:

- HPPs located downstream of the HPP

### 5.2 Vulnerable stakeholders

Vulnerable stakeholders are stakeholders, who for a variety of individual reasons, might be disproportionately affected by the HPP or might have difficulties to assert their rights. They include:

1. Elderly people
2. Multi-children families
3. Single-parent families (including women-headed ones)
4. Families registered as living below the poverty level

## 5. People with disabilities

## 5. STAKEHOLDER ENGAGEMENT ACTIONS

### 6.1 Preparatory activities

These activities are to be implemented at the beginning of the operation phase, and maintained across the lifetime of the Hydro Power Plant.

Activity	Means	Key messages	Targeted stakeholders
Webpage	Stakeholder engagement through the web	<ul style="list-style-type: none"> <li>- Brief description</li> <li>- ESG impacts management</li> <li>- Public documentation</li> <li>- Grievance mechanism</li> <li>- ESG Manager identification, address, and contact</li> </ul>	<ul style="list-style-type: none"> <li>- All stakeholders</li> </ul>
Worker's information folder	Information binder in the Powerhouse	<ul style="list-style-type: none"> <li>- Organizational chart;</li> <li>- Grievance mechanism/form;</li> <li>- Grievance box;</li> <li>- ESG manager identification, address, and contact</li> </ul>	<ul style="list-style-type: none"> <li>- workers</li> </ul>
Set-up a stakeholder register	Internal register	<ul style="list-style-type: none"> <li>- Record of all stakeholder engagement activities and enquiries</li> <li>- Keep a minute of specific meetings</li> </ul>	<ul style="list-style-type: none"> <li>- All stakeholders</li> </ul>
Identification of vulnerable persons	Internal document	<ul style="list-style-type: none"> <li>- List of households / individuals eligible as vulnerable in the Hydro Power Plant area of influence, and specific stakeholder engagement measures required</li> </ul>	<ul style="list-style-type: none"> <li>- Vulnerable stakeholders</li> </ul>

## 6. SPECIFIC ENGAGEMENT ACTIVITIES

Activity	Means	Key messages	Targeted stakeholders
Periodic communication with local community focal points	Direct communication / phone / meetings as needed	operational updates, road access, community concerns, safety matters	The Mayor, Trustee, Advisory Council members, nearby villages
Social Fund communication and implementation coordination	Coordination meetings, municipality communication, community consultations where needed	annual Social Fund priorities, implementation updates, community benefit distribution	Ozurgeti Municipality, Advisory Council, beneficiary communities
vulnerable persons	vulnerable stakeholders in the HPP area of influence	grievance accessibility, emergency communication, support measures where relevant	-Women-headed households Elder-headed households ≥ 60/65 years Households with members with disabilities Economically vulnerable (leaving below the poverty)
NGO and Civil society	Company website, formal written response, direct meetings where needed	environmental monitoring, biodiversity protection, community development activities, Social Fund implementation, grievance mechanism	Interested NGO and Civil society organizations
Media	Company website, formal written response, ESG annual report disclosure	ESG performance, community investments, environmental monitoring, grievance mechanism, Social Fund updates	Interested Media

## **7. Grievance Mechanism**

The Hydro Power Plant operation may potentially lead to disagreements or disputes related to community safety, ecological flow release, river use, environmental performance, Social Fund implementation, or other concerns raised by stakeholders. In order to timely and effectively prevent them, or help resolving them in an amicable way, the Hydro Power Plant has established a permanent mechanism for receiving and handling stakeholders' grievances and concerns.

The grievance mechanism is open to all stakeholders, notably the PACs and workers. Only inquiries related to the HPP activities are eligible. They can be sent to the ESG manager verbally, in writing, via email or telephone.

The grievance mechanism will be coordinated by the ESG manager who will enter any received inquiries in the Grievance Database. Questions and requests that have not been answered to the satisfaction of a stakeholder twice will be escalated to the Holding level. If the Holding cannot answer satisfactorily the complainant twice, the complainant is informed about its right to the court.

Both signed and anonymous inquiries might be received by the Company. However, if an inquirer would like to receive a reply, he/she has to provide contact details. Depending on the form of the inquiry, the Company ESG manager will reply within minimum 10 days and maximum 30 day to the complainant, ensuring that the inquiry will not be closed until the party is satisfied with the answer or chose to follow further complaint procedures.

## **8. STAKEHOLDER ENGAGEMENT REGISTER**

Successful stakeholder engagement depends on continuous effort, performance monitoring, analysis and adapting to changed circumstances and stakeholder information needs. A systematic record of all stakeholder inquiries, questions and grievances will be kept. In addition to the grievance and community request records, a separate stakeholder interaction log is maintained and regularly updated at the HPP level. This log captures the full history of stakeholder engagement activities, including interactions not only with local residents, but also with municipality representatives, Advisory Council members, NGOs, civil society organizations, external institutions, and other relevant stakeholders.

## **9. REVISION**

The Stakeholder Engagement Plan (SEP) shall be formally reviewed on an annual basis by the end of January. Any necessary revisions will be proposed and implemented by the personnel responsible for ESG management of the Hydro Power Plant, based on monitoring results, stakeholder feedback, and HPP developments.

The SEP is revised by the Company ESG Manager, approved by the Company Director, with oversight from the Holding ESG and Sustainability Lead.

## 9.1. Annex 1: Stakeholder Engagement Plan Implementation

### Bakhvi 2 HPP

#### Stakeholder Engagement Plan implementation

##### FORM 1: MEETING NOTES

Date: \_\_\_\_\_

Place: \_\_\_\_\_

Written by: \_\_\_\_\_

**Participants (Name, First name, position):** Total number : \_\_\_\_\_ M : \_\_\_\_\_ F :

- 
- 

*If available, appendix the whole list of participants.*

**Objective of the meeting and agenda:**

- 
- 

**Topics discussed:**

- 
- 

**Points raised by the HPP:**

- 
- 

**Points raised by other stakeholders:**

- 
- 

**Decisions made and follow-up actions:**

- 
-

**Actions to be undertaken by the HPP as a result of the meeting:**

Bakhvi 2 HPP

Stakeholder Engagement Plan implementation

FORM 2: GRIEVANCE FORM

Bakhvi 2 HPP Complaint Form	
ჰიდროელექტროსადგური ბახვი 2-ის საჩივრის ფორმა	
<i>PART A: COMPLAINANT DETAILS / ნაწილი ა: ინფორმაცია მომჩივნის შესახებ</i>	
<i>Complaint Ref Number / საჩივრის ნომერი -----</i>	
<i>Date Received / მიღების თარიღი</i>	<i>Method of Complaint/ საჩივრის შემოტანის მეთოდი</i>
<i>Location / ქალაქი</i>	Verbal/ზეპირი <input type="checkbox"/> Written/წერილობით <input type="checkbox"/>
<i>District / უბანი</i>	Other (indicate)/სხვა (მიუთითეთ):
<i>Complainant Name / მომჩივნის სახელი</i>	Original (White copy) - for official use Pink copy - to Applicant
<i>ID Number/ პირადი ნომერი</i>	Yellow copy - Returned to Applicant upon decision ორიგინალი (თეთრი კოპია) – ოფიციალური გამოყენებისთვის ვარდისფერი კოპია – რჩება მომჩივანს ყვითელი კოპია – უბრუნდება მომჩივანს გადაწყვეტილებასთან ერთად
<i>Complainant Address / განმცხადებლის მისამართი</i>	
<i>Complainant Telephone განმცხადებლის ტელეფონი</i>	
<i>Cadastral Land Parcel No / მიწის ნაკვეთის საკადასტრო №</i>	

Filled By (name, last name)/ შეივსო(სახელი, გვარი):			
Complaint Category:/საჩივრის კატეგორია:			
Access/მისასვლელის დაზიანება ან შეზღუდვა <input type="checkbox"/> Damage/საკუთრების დაზიანება <input type="checkbox"/> Traffic Accident /საგზაო შემთხვევა <input type="checkbox"/> Livelihood /საარსებო შემოსავალზე ზემოქმედება <input type="checkbox"/> Disturbance /შეწუხება <input type="checkbox"/> Air Quality/ჰაერის ხარისხი <input type="checkbox"/> Personnel /დასაქმებული <input type="checkbox"/> Other(specify)/სხვა (მიუთითეთ): <input type="checkbox"/>			
PART B: DETAILS OF COMPLAINT /ნაწილი ბ: საჩივრის დეტალური აღწერა			
Date of Incident/შემთხვევის თარიღი:		Supporting Documentation/თანმდევი დოკუმენტაცია:	
Description of Complain/საჩივრის აღწერა:			
This part will be signed by the complainant to indicate acceptance of the complaint details described above: აქ ხელმოწერით მომჩივანი ადასტურებს საჩივრის აღწერის სისწორეს:			
Name /სახელი გვარი: _____		Signature/ხელმოწერა: _____	
PART C: DETAILS OF RESOLUTION/ნაწილი გ: გადაწყვეტილება			
Define immediate action taken/ დაუყოვნებლივ მიღებული ზომები			
Summary of complaints assessment/ საჩივრის შეფასების მოკლე ანალიზი			
Corrective Actions and Sign Off / გამოსწორებითი ქმედებები და საჩივრის დახურვა			Due Date/ შესრულების თარიღი
1			
2			
3			

<i>Sign off Date /</i> თარიღი		Signature/ ხელმოწერა	Name/სახელი, გვარი
<b>PART D: COMPLAINANT SIGN OFF /ნაწილი დ: მომჩივნის ხელმოწერა</b>			
<p><i>This part will be signed by the complainant to indicate acceptance of the complaint resolution described above:</i></p> <p>აქ ხელმოწერით მომჩივანი გამოხატავს თანხმობას მიღებულ გადაწყვეტილებასთან დაკავშირებით:</p> <p>Name/სახელი, გვარი: _____ Signature/ხელმოწერა: _____</p>			

**Response to the grievance:**

[insert date]

[insert name]

[insert address]

Our ref: [insert if any]

Your ref: [insert if any]

Our contact details (email & phone): [insert]

Dear [insert name]

Heading, eg Complaint about ...

Thank you for bringing your concerns to our attention in [your letter/your email/our conversation] of [date].

As we understand it, you are concerned that [insert your understanding of the issues of concern, using a bulleted or numbered list if there is more than one point].

We are going to be investigating your concerns. We would be happy to meet you to discuss the issues you have raised and our investigation procedures. [Suggest a date and/or provide contact details.]

I am looking into the points you have made as a matter of urgency and shall be in touch with you with a full response by [insert anticipated response time – not longer than 28 working days].

Please do contact me again in the meantime if I can be of further assistance. My email and phone number are given above.

Yours sincerely

Name

Job title

### 9.1. Annex 2: Grievance/Protest/Request Log



### 9.2. Annex 3: Stakeholder Matrix



### 9.3. Annex 4: Guidance Note on Stakeholder Identification

