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ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) GANJA WASTEWATER PROJECT, AZERBAIJAN STAKEHOLDER ENGAGEMENT PLAN

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ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) GANJA WASTEWATER PROJECT, AZERBAIJAN

STAKEHOLDER ENGAGEMENT PLAN

Prepared by:



Ecoline
International

Ecoline International Ltd.
(Sofia, Bulgaria)



integra
CONSULTING

Integra Consulting Ltd. (Prague,
Czech Republic)



Crowe

ABAK-Az Crowe Ltd.
(Baku, Azerbaijan)



Director: Dr. Tatiana Strizhova
Mob.: +359 876 630 522
E-mail: info@ecoline-int.org

Managing Partner: Martin Smutny
Mob.: +420 724 110 779

E-mail:
martin.smutny@integracom.com

Director: Zamin
Huseynov
Tel.: +994 12 492 7856
Mob.: +99450 326 7448
E-mail: abak@crowe.az

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LIST OF ABBREVIATIONS

ASWRA	Azerbaijan State Water Resources Agency
E&S	Environmental and social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
GCAP	Green City Action Plan
KPI	Key Performance Indicator
NGO	Non-Governmental Organization
OJSC	Open joint-stock company
PE	Population Equivalent
PR	Performance Requirement (of EBRD)
SDG	Sustainable Development Goals
SEA	Strategic Environmental Assessment
SEP	Stakeholder Engagement Plan
WWTP	Wastewater Treatment Plant

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1 INTRODUCTION

The European Bank for Reconstruction and Development (the EBRD or the Bank) is considering providing finance to the Azerbaijan State Water Resources Agency (ASWRA or the Company) for construction of the Ganja Wastewater Treatment Plant (WWTP) (the Project). The proposed Project is one of the components of the wider Ganja Water and Wastewater framework project and Priority Investment Programme being implemented under the Ganja Green City Action Plan (GCAP)¹.

ASWRA, a state-owned company, was established in 2023 to oversee the management and governance of all water resources in Azerbaijan, including providing ASWRA water supply and wastewater collection and sewage treatment services in Ganja City. ASWRA will implement the Project with support of its Ganja branch and the Project Implementation Unit.

The WWTP Project has been categorised as “A” in accordance with the EBRD’s 2019 Environmental and Social Policy. This means that it is required to conduct a formalised and participatory Environmental and Social Impact Assessment (ESIA) of the proposed Project and associated infrastructure. Then, the ESIA documents should be publicly disclosed for a minimum period of 120 days and consultations be held during this period.

A consortium of environmental and social (E&S) consulting companies (the Consultant)² has been commissioned to prepare the ESIA and associated E&S documents. **This Stakeholder Engagement Plan (SEP) has been developed as part of the ESIA package.**

The SEP’s objectives are to:

- present the national legal framework and the EBRD’s requirements in relation to stakeholder engagement process;
- identify all Project stakeholders, including those who might be considered vulnerable and might need support during the consultation process and the project cycle;
- develop a stakeholder engagement programme that will be implemented by ASWRA to ensure that the E&S information on the Project is timely provided and properly communicated to the Project’s stakeholders, and the feedback communication channels are available to them;
- define the means of engaging with the identified stakeholders in a meaningful and culturally appropriate way; and
- propose a procedure or a mechanism for receiving, registering, and addressing grievances and suggestions from stakeholders.

2 PROJECT DESCRIPTION

2.1 Project Rationale

Ganja is the third largest city in Azerbaijan, with a population of approximately 330,663 people³. It embraces the settlements of Hajikend, Javadkhan, Mehseti, Natavan, Sadilli and Shikhzamanli. The city’s population is steadily increasing due to various reasons, including the natural growth, urbanisation processes, and migration. If the population continues to grow

¹ EBRD. 2025. GrCF3 W2 - Ganja Water and Wastewater. <https://www.ebrd.com/work-with-us/projects/psd/55197.html>

² The consortium encompasses Ecoline International Ltd. (Bulgaria), Integra Consulting Ltd. (Czech Republic) and ABAK-Az Crowe Ltd. (Azerbaijan).

³ RA State Statistical Committee. 2024. Demographic indicators of Azerbaijan. https://www.stat.gov.az/menu/6/statistical_yearbooks/?lang=en

at the current rate, it might reach 376,000 people by 2040. The 2022 Ganja Master Plan assumes that the population might even reach 500,000 inhabitants by 2040⁴.

The economy of the city is also developing. Its industrial infrastructure is dominated by metallurgy, followed by food products and machinery/equipment production. The Master Plan for Ganja includes expanding the aluminium plant, restoring a clay soil plant, building a carpet factory, developing specialized industrial zones, including Ganja Industrial Park (metallurgy, cobalt, and clay-soil production), Ganja Chemical Park (fertilizers and chemicals), Ganja Pharmaceutical Industry (medicinal plants and Naftenic fraction), and the Agricultural Production Technology Development Park (meat, dairy, fruit, and vegetable processing).

The lack of wastewater treatment solutions and the related environmental and health risks are expected to exacerbate with the population growth and economic development of the city. The GCAP⁵ identifies the construction of a WWTP as a critical step in addressing the city's pressing environmental and public health challenges. One of the strategic goals is to "implement and maintain a functioning wastewater treatment plant and network." This Project is essential to modernise and significantly improve wastewater management in Ganja, with the primary objective of improving sanitation and ensuring compliance with national and international standards. Currently, the city's wastewater management system is outdated. The discharge of untreated sewage and liquid industrial waste has exacerbated the problem, contributing to the pollution of water bodies, groundwater, and soil. The construction of the WWTP has been identified as one of the 26 Key Actions in the GCAP and is a significant step towards green urban development of Ganja. According to the established Key Performance Indicator (KPI), the goal is to treat at least 40% of wastewater in line with applicable national standards, a substantial improvement from the current level of 0%.

The implementation of the Project will also support the commitments of the Municipality of Ganja within the initiative of the Governor of the Mayor and the implementation of the Sustainable Energy and Climate Action Plan of Ganja⁶.

2.2 Project Characteristics and Location

The proposed WWTP's design capacity is about 100,000 m³/day average flow, which is 400,000 Population Equivalent (PE). The WWTP can serve the entire Ganja city, accommodating the current population and projected growth, and ensure:

- a treated effluent that is EU-compliant as well as meeting national discharge standards, and meeting discharge standards for disposal to receiving waters;
- a stabilized sludge suitable for reuse or final disposal.

Table 1. summarises the basic characteristics of the WWTP.

Table 1. Main characteristics of the WWTP Project⁷

Parameter	Description
Project proponent	ASWRA
Estimated investment cost (CAPEX)	EUR 64,428 million, excl. VAT.
Design capacity for WW treatment	400,000 PE. Average dry weather flowrate of 100,000m ³ /day.
Start and duration of construction phase	Planned construction starts in the first quarter of 2026. Duration of construction 36 months

⁴ Ganja Master Plan, 2022.

⁵ AtkinsRéalis. 2024. EBRD Green Cities - Ganja Green City Action Plan. <https://ebrdgreencities.com/assets/Uploads/PDF/Ganja-Green-City-Action-Plan-EN.pdf>

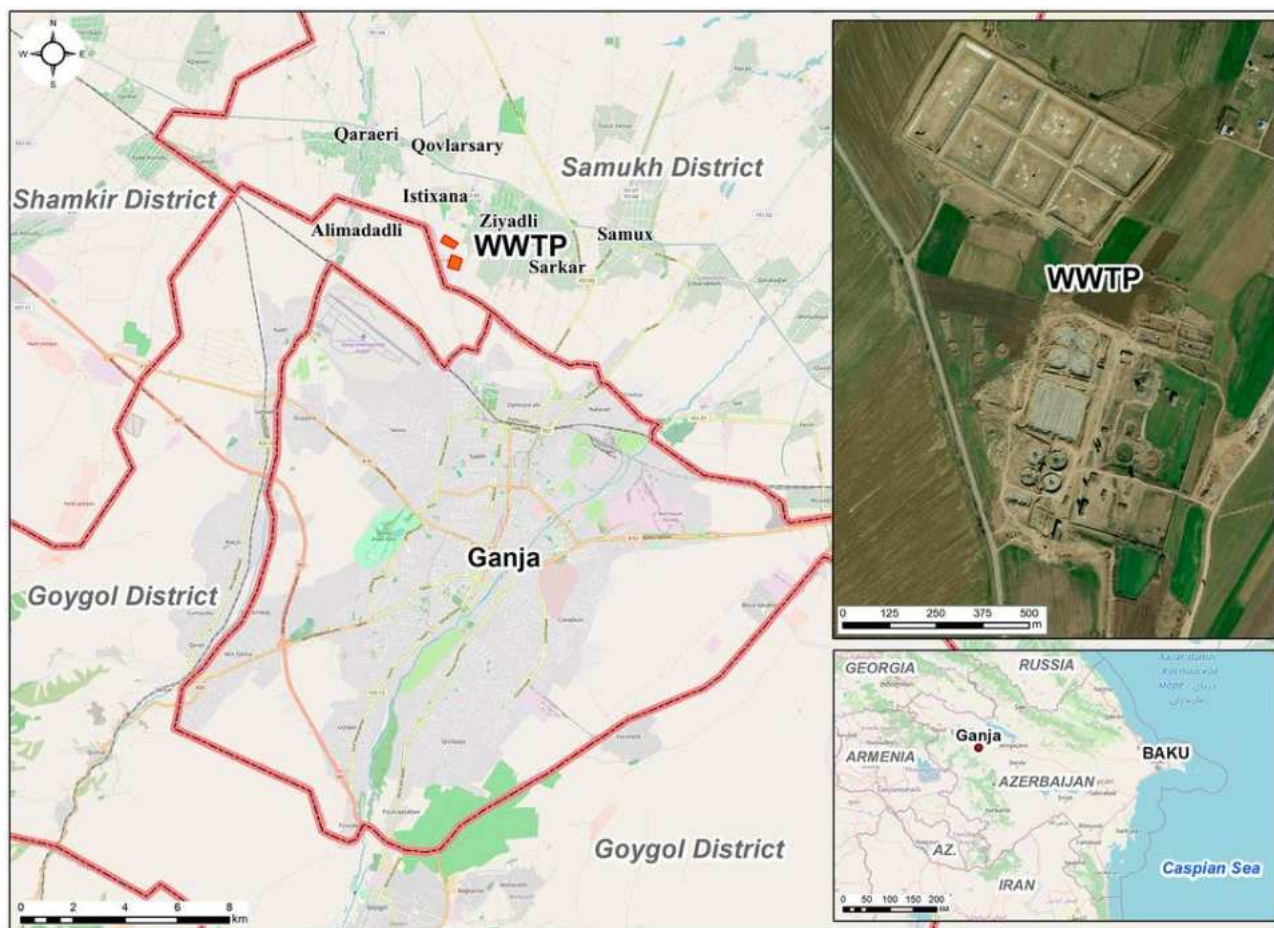
⁶ <https://eu-mayors.ec.europa.eu/en/signatory/28209#contacts>

⁷ Sweco, 2024. Ganja Wastewater Treatment Plan – ESIA Scoping Report, updated based on the information from ASWRA as of April 2025.

Estimated commission date of new WWTP	June 2029
Design lifetime of new WWTP	50 years (Civil works) and 15 years (Mechanical works)
Estimated number of staff during construction	100
Estimated number of staff during operation	21

In 2024, a Feasibility Study Update Report was completed for the wider Ganja Water and Wastewater Project, including the current WWTP Project⁸. Earlier, in 2016, a national Environmental Impact Assessment (EIA) was developed⁹ for the WWTP project and a positive statement (EIA approval) was issued by the Environmental Expertise body of the Ministry of Ecology and Natural Resources in 2016.

The proposed WWTP will be located 2.3 km north of Ganja, on the existing WWTP site where construction commenced in the 1980s, but was never completed (**Figure 1**). The total area of the WWTP site, which is owned by ASWRA, is about 33 ha, including the pond area. The estimated area required for the WWTP Project structures with a capacity of 400,000 PE would be approximately 15 ha. The currently existing facilities are sited at two separate plots: the northern one accommodates effluent ponds that were renovated under the KfW project in 2020; and the southern one hosts some semi-built / abandoned structures and is designated for WWTP construction (**Figure 2**).



Source: prepared by the Consultant

Figure 1. Location of the Ganja WWTP Site

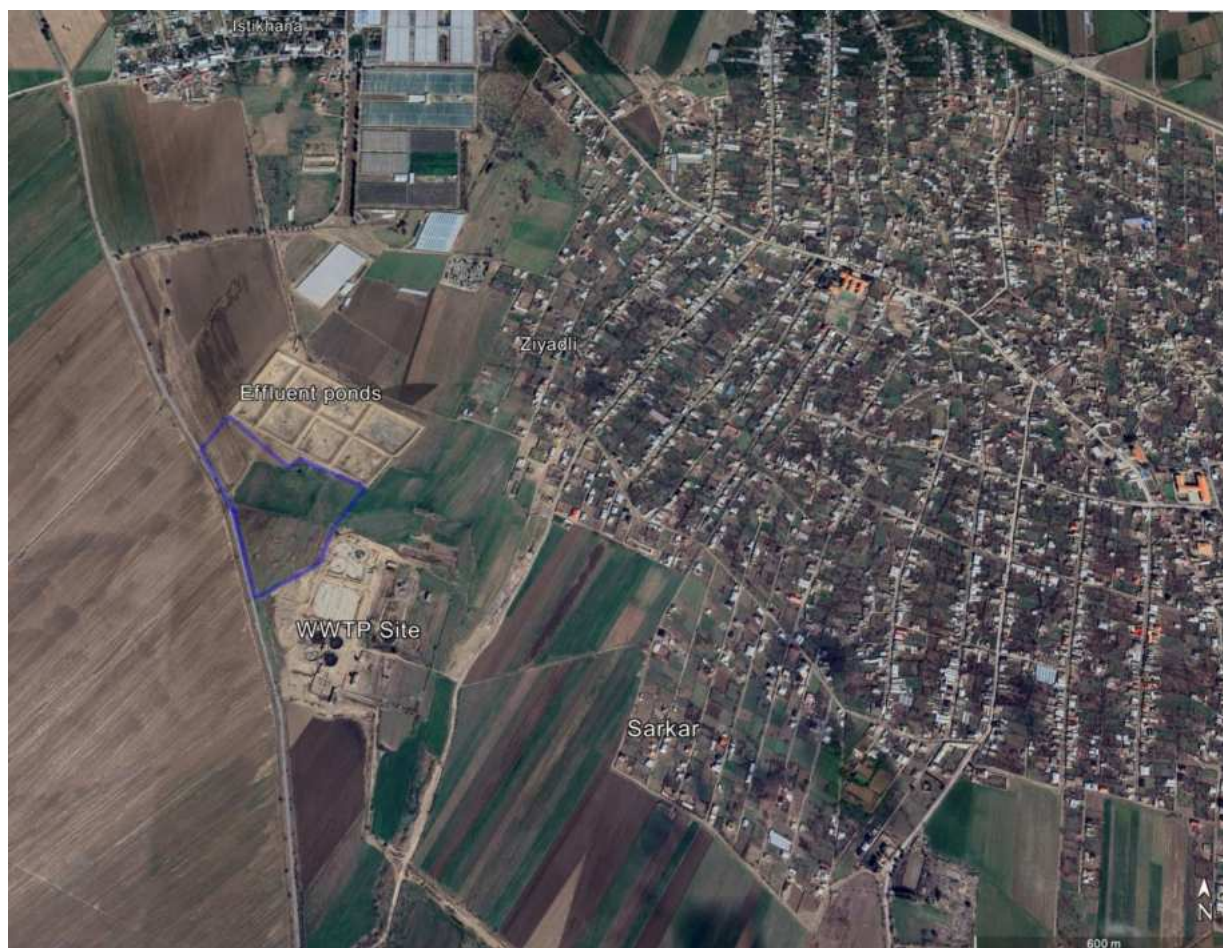
⁸ SWEKO, 2024. Ganja Water and Wastewater Feasibility Study Update, Feasibility Study Report.

⁹ Dornier-Schneider Consulting. 2016. Additional Investigation Study for the Wastewater Treatment Plants in Ganja and Sheki- Programme Phase 3. Part 1.3 Ganja Wastewater Treatment Plant. Volume 3: Environmental Impact Assessment Report.

As the effluent ponds were already renovated, they are not part of the Project. There is a main sewage collector constructed under the KfW project and running from Ganja to the WWTP site, thus this collector is also not part of the Project. The existing sewerage network constructed by the state and KfW financing covers the city centre on both sides of Ganja River and the design is prepared for connecting the remaining areas of the city¹⁰.

The Project site is in the territory of Ziyadli Municipality of Samukh District. It is surrounded by residential areas located at various distances (**Figure 1**). Ziyadli village is the closest, with its nearest structure being 300m northeast from the WWTP site and 125m from the effluent ponds (**Figure 2**). Istixana village lies 1km north from the WWTP, with the effluent discharge pipe planned to run partly through its road. Another nearby village is Sarkar (600m to the east). Other villages in the area are located further from the WWTP/pond site: Govlarsari (1.9 km to the north), Alimamadli (2.2km to the west), and Garayeri (2.3km to the northwest).

The WWTP may require additional space to manage the sludge it will produce. If the sludge cannot be re-used in agriculture, a larger storage area – ca. 16 ha of land – is needed to store the sludge for up to 5 years. As only 4.4 ha are available on the current site, an additional 11.6 ha of land would have to be purchased for long-term sludge storage (**Figure 2**).



Source: prepared by the Consultant using Google Maps and a contour of additional land per SWEKO 2024¹¹

¹⁰ SWEKO, 2024. Ganja Water and Wastewater Feasibility Study Update, Feasibility Study Report.

¹¹ Ibid.

Figure 2. The sites of the WWTP and effluent ponds, and a proposed location of additional land (blue contour) that may be procured for sludge management, if agricultural re-use is not feasible

ASWRA has explored different ways to manage treated wastewater. It is planned to construct a discharge pipe to transport the treated effluent into the irrigation canal during the growing season for reuse in agriculture. During the non-growing season, the treated effluent would be discharged into the Goshgarchay (Goshgar) River. The 2016 EIA suggested sending the effluent 8 km away to the river. However, a shorter route has been proposed and approved, which uses a pipeline starting at the WWTP's existing effluent ponds (Figure 3). This pipeline would follow an old drainage path through farmland, pass through the village of Istixana, cross more fields, and reach the Shemkir irrigation canal. It would then run alongside the canal, cross it near Govlarsari village, and continue to Garayeri village, where the treated water would be released into the Goshgarchay River.



Figure 3. Proposed effluent discharge pipeline route from Ganja WWTP to irrigation canal and river¹²

3 LEGAL REQUIREMENTS PERTAINING TO STAKEHOLDER ENGAGEMENT

3.1 National Legal Requirements

The procedures for public consultations, information disclosure, and grievance mechanisms relevant to this Project are governed by existing Azerbaijani legislation, as outlined below.

The Law on Access to Information, September 30, 2005¹³, aims to provide a legal framework that ensures free, unrestricted, and equal access to information, in line with Article 50 of the Azerbaijan Republic's Constitution. It is based on the principles of an open society

¹² Ibid.

¹³ https://www.ecoi.net/en/file/local/1349326/1226_1335526963_azerbaijan-law-on-right-to-obtain-information-2005-en.pdf

and a democratic, law-governed state, and it facilitates citizen oversight of public duties. Under this law, any individual has the right to apply directly or through a representative to the information holder and to choose the method and format for receiving the information. Applicants are entitled to:

- inquire about the availability of the required information from the information holder;
- obtain supporting details to acquire missing information;
- receive the requested information freely, without restriction, and on an equal basis, provided the information holder possesses it.

Additionally, people can review documented information about themselves, request corrections, and ask who is using such information and for what purposes.

The Law “On the Procedure for Considering Appeals of Citizens”, September 30, 2015 regulates the procedures related to the right of citizens to appeal to state and local government bodies. It outlines the general concepts and principles for considering citizen appeals, defines the law's scope, specifies the requirements for applicants, and sets the procedures for receiving, registering, and considering applications. The law also addresses the specifics of handling appeals related to legal violations and corruption, establishes the obligations of officials dealing with applications, outlines the rights of applicants, and details the procedures for oral (non-written) applications made through the media or by telephone.

The Law on “Public Participation”, November 22, 2013, provides for various types of consultation methods, such as public discussions (including on draft laws), public hearings, public opinion surveys, and written consultations. These can be initiated by state bodies, local self-government entities, civil society organizations, public councils, or individual citizens. However, the law does not oblige the government to hold public discussions or hearings.

Public hearings are part of the national EIA process, as outlined in the environmental impact assessment (EIA) rules issued by the Cabinet of Ministers in October 2022. These rules were approved by Resolution No 362 on September 21, 2022, pursuant to its mandate under the EIA Law enacted on July 17, 2018.

3.2 EBRD Requirements

All projects financed by the EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy, which includes ten Performance Requirements (PRs) for key areas of E&S sustainability. The relevant EBRD requirements pertaining to stakeholder engagement are contained in:

- PR10: Informational Disclosure and Stakeholder Engagement¹⁴;
- Guidance note - PR 10: Information disclosure and stakeholder engagement (2023)¹⁵.

In addition, the EBRD's Independent Project Accountability Mechanism¹⁶, as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy¹⁷; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

¹⁴ EBRD Environmental and Social Policy, 2019 <https://www.ebrd.com/home/news-and-events/publications/institutional-documents/environmental-and-social-policy-2019.html>

¹⁵ EBRD. 2023. <https://www.ebrd.com/home/who-we-are/ebrd-values/ebrd-environmental-social-sustainability/reports-and-policies/ebrd-performance-requirements.html#PR10>

¹⁶ <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/about-ipam.html>

¹⁷ <https://www.ebrd.com/home/who-we-are/strategies-governance-compliance/access-to-information-policy.html>

The EBRD considers stakeholder engagement as an essential part of good business practice and a way of improving the quality of projects. Stakeholder engagement will be an ongoing process throughout the project, to ensure transparency with all stakeholders that may be affected by, or have influence on, the project.

Stakeholder engagement as part of the land acquisition process, where required, should be undertaken in accordance with the national legislation for projects of public interest and EBRD requirements, in particular: PR5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement and associated EBRD guidance.

The following elements of stakeholder engagement are applicable to the Project:

- **identification of stakeholders** including those Project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable and their analysis to determine the level of communication that is appropriate for the Project;
- **stakeholder engagement planning** with the development of a SEP describing how engagement with identified stakeholders will be carried out throughout the Project life cycle;
- **information disclosure** which will ensure that relevant Project information including the one on its E&S impacts, risks and opportunities is provided to the stakeholders together with meaningful consultation - a two-way process which continues on an ongoing basis;
- **grievance mechanism** established to receive and facilitate resolution of stakeholders' concerns and grievances, in particular, the ones on the Client's E&S performance;
- **ongoing reporting** on E&S performance to stakeholders with reports disclosed at least annually.

This SEP is tailored to match the project's scope, nature, and potential effects, ensuring that identified stakeholders are considered in decision-making and future planning, with roles and responsibilities clearly outlined.

4 EXISTING STAKEHOLDER ENGAGEMENT PRACTICE OF THE COMPANY

This chapter provides an overview of ASWRA's general stakeholder engagement activities and its grievance mechanism and overview of arranged consultations that related to the WWTP during the preparation of the strategic documents such as Green City Action Plan and Ganja Master Plan.

4.1 General Practice

The ASWRA uses the following main channels of communication¹⁸:

- website (www.azersu.az)
- social media, such as Facebook, Twitter, Instagram, Telegram, YouTube
- online platforms e-su and e-gov
- television, radio and/or newspapers
- ASWRA Ganja's meter readers and other staff.

¹⁸ Sweco, 2024 Stakeholder engagement plan for project water reservoirs and pipe components.

ASWRA operates an external grievance mechanism for the water supply and wastewater services in Ganja. Stakeholders in Ganja can submit grievances and requests through a variety of channels designed to accommodate diverse preferences:

- 955-hotline;
- ASWRA Website (www.azersu.az);
- online public monitoring platform (www.enezaret.az);
- social media;
- a traditional option for stakeholders to raise issues face-to-face at the office of ASWRA in Ganja.

Each grievance is systematically recorded in a database. National legislation mandates that ASWRA resolve issues within 15 to 30 days, though the agency consistently aims for faster outcomes, resolving most grievances within 2 to 3 days. Feedback from ASWRA's customer department highlights the mechanism's success, affirming its reliability and effectiveness in addressing stakeholder needs.

4.2 Engagement Related to the Planned WWTP

The construction of the WWTP was considered during the development of strategic documents, such as the Green City Action Plan, the Ganja Master Plan, and the associated draft Strategic Environmental Assessment (SEA)¹⁹ report in 2022 and 2023. Representatives from ASWRA, along with stakeholders including academia, experts, NGOs, and the Ganja executive authority, actively participated in a series of interviews, focus groups, and meetings²⁰.

The preliminary discussions with local stakeholders were held on 23 July 2024, during the initial ESIA Scoping stage for the WWTP²¹ and involved a meeting with: ASWRA (Baku), Ganja Sukanal, Department of Ecology and Natural resources of Ganja city; Kapaz Municipality of Ganja city, Municipality of Ziyadli, Nizami Municipality, Ganja city, resident of Ziyadli village, and two residents of Ganja city.

During the stakeholder meeting in Ganja, the background of the WWTP Project was presented, and participants were invited to share their visions regarding the Project's related expectations, potential benefits, and concerns. Representatives from Ziyadli village expressed their support for the Project and conveyed their belief that it would be constructed in accordance with international standards and best practices. They expressed confidence that the impact on local residents would be minimal.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Stakeholder Engagement Approach / Methodology

The initial phase of effective stakeholder engagement involves identifying the parties affected by the project, as well as those who have an interest in it or the capacity to influence its outcomes, whether positively or negatively, permanently or temporarily.

Based on this definition, project stakeholders are divided into two primary categories:

¹⁹ UNECE. 2023. Public Hearing on the Pilot Strategic Environmental Assessment for the draft Master Plan of the city of Ganja. <https://unece.org/info/events/event/382914>

²⁰ AtkinsRéalis. 2024. EBRD Green Cities - Ganja Green City Action Plan. <https://ebrdgreencities.com/assets/Uploads/PDF/Ganja-Green-City-Action-Plan-EN.pdf>

²¹ SWECO. ESIA Scoping Report, July 2024.

- **Affected parties:** individuals or groups who are, or are likely to be, impacted by the project due to real or potential effects on their physical environment, health, security, cultural practices, well-being, or livelihoods;
- **Interested parties:** individuals or groups who may have an interest in the project because of its location, characteristics, impacts, or issues related to public concern.

The identification of stakeholders in relation to the Project was carried out based on the following criteria:

- **Impact:** the implementation of the Project may significantly affect a certain social group (stakeholders);
- **Influence:** the social group is able to significantly influence the process of Project implementation;
- **Partnership:** there are opportunities for building partnerships between the Company and the given social group; and
- **Interest:** a social group or individuals not necessarily directly affected by the Project may (or may not) show interest in it.

5.2 Stakeholder Categories and Groups

All the stakeholders have been grouped into the following two major categories:

- **Internal stakeholders** representing the organisations that undertake the Project and those who work within them such as management, staff, owners, shareholders, as well as contractors and subcontractors involved in the current operations and the Project implementation and benefiting from it (investors and shareholders); and
- **External stakeholders** representing the groups or individuals that are not part of the Company and the Project but are affected in some way by their decisions and actions.

The SEP is intended to cover the Company's engagement **with external stakeholders**, while the stakeholder analysis covers both internal and external stakeholders.

In order to ensure effective and meaningful engagement, the Project's external stakeholders have been clustered into the following groups:

- Potentially affected parties:
 - Potentially affected communities;
 - Potentially vulnerable groups;
 - Potentially affected commercial and public organizations.
- Interested parties:
 - State authorities;
 - Regional/city/district authorities;
 - Communities;

Non-commercial organizations (non-governmental organizations (NGOs), mass media, academia and others);

- Commercial organizations;
- International financial institutions;
- International initiatives and projects.

5.3 Stakeholder Analysis

The interests and /or concerns and influence towards the Project of the abovementioned stakeholder groups are analysed in **Table 2**.

Any stakeholders that are not included in the table but wishes to receive information about the Project and its E&S aspects and impacts can approach ASWRA.

Table 2. Stakeholders, their relation to, interests in, and influence on the Project

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
POTENTIALLY AFFECTED PARTIES		
Potentially affected communities		
Residents of the nearest settlements to the WWTP: - <i>Ziyadli village</i> (appr. in 300m); - <i>Sarkar village</i> (appr. in 600 m); - <i>Istixana village</i> (appr.in 1000m); - <i>Alimamadli village</i> (appr. in 2.3 km); - <i>Garayeri village</i> (appr.2.3 km); - <i>Govlarsary village</i> (appr.1.9 km)	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> • construction-related impacts (such as increased traffic, air emissions and noise); • potential odour that might come from the WWTP facilities during operations and other operation-related impacts (e.g., noise, traffic); • accidental spills or leaks of untreated effluent in the event of plant malfunctions (including emergencies); • possible anxiety about potential risks from WWTP during the operations, e.g., if trust in the facility's management is low; • possible reduction in property values due to proximity to the WWTP related to concerns about odour, aesthetics, or stigma, even if the plant operates efficiently. <p>May be interested in:</p> <ul style="list-style-type: none"> • job opportunities during the construction and operation phases. • transparency and clear communication from ASWRA and local authority, including details about the Project and its impacts; • participating in public consultations and meetings organized by local administration and ASWRA; • operational environmental impact monitoring to guarantee the WWTP's safety 	Medium to Low
<p>Farmers (including herders), who use lands around the WWTP (Samukh District, including Ziyadli village; Sarkar village and Istixana village)</p> <p><i>Note: the closest farm is next to the boundary of the WWTP's site.</i></p>	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> • Possible odours or noise due to proximity to the WWTP; • accidental spills or leaks of untreated effluent during plant malfunctions (including emergencies); • road traffic accidents involving farmers' herded animals during construction or operation; • additional costs to adapt irrigation systems or farming practices (e.g., crop selection) to use treated water and sludge while meeting sanitary standards; • soil contamination from improperly managed sludge; • inadequately treated wastewater or sludge containing pathogens, heavy metals, or chemicals. <p>May be interested in:</p> <ul style="list-style-type: none"> • transparency and clear communication from ASWRA and local authority, including details about the Project and its impacts; • participating in public consultations and meetings organized by ASWRA and local administration; • compensation for disruption or land use (if applicable); • a consistent water source for irrigation and the related increased productivity; • enhanced soil fertility from properly processed and safe sewage treatment sludge; • assurance that treated water and sludge comply with standards and regular monitoring is done. 	Medium to Low
Land-owners affected by a possible sludge storage expansion and possibly by construction of the effluent pipeline (between the WWTP and effluent ponds)	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> • Economic displacement (loss of a primary income source, e.g. crop or livestock production). <p>May be interested in:</p> <ul style="list-style-type: none"> • receiving adequate compensation; • job opportunities or support for transitioning to other income sources, such as trainings and others; 	Medium to High

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
	<ul style="list-style-type: none"> information about the Project, its progress, and its E&S impacts; participation in public consultations and meetings. 	
<p>Residents of Ziyadli and Sarkar villages whose residential houses may fall within the Sanitary Protection Zone²² of the WWTP and who thus could face resettlement</p> <p><i>Note: the distance from the effluent ponds to the nearest residential building is approx. 125m</i></p>	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> physical and economic resettlement (that is relocation and loss of homes, farmland, or access to community spaces, or a primary income source (e.g. crop or livestock production)). <p>May be interested in:</p> <ul style="list-style-type: none"> avoiding resettlement. If resettlement is unavoidable, they would seek fair compensation, adequate resettlement sites (with similar or better living conditions); job opportunities or support for transitioning to other income sources, such as trainings and others; information about the Project, its progress, and its E&S impacts; participation in public consultations and meetings. 	Medium to High
<p>Residents of settlements impacted by the construction of discharge pipeline</p> <p>and</p> <p>Farmers whose land will be crossed by the discharge pipeline:</p> <ul style="list-style-type: none"> -Istixana village; -Govlarsari village; -Garayeri village. 	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> increased air pollution and noise during the construction works; restricted access to land near the pipeline route during the construction works; a risk of accidental leaks of treated wastewater during the operation of the pipeline. <p>May be interested in:</p> <ul style="list-style-type: none"> information about the Project, its progress, and its E&S impacts; participation in public consultations and meetings. Additionally for farmers: compensation for disruption or land use (if applicable) 	Medium to Low
Residents of the city of Ganja (direct beneficiaries of the Project)	<p>Will benefit from:</p> <ul style="list-style-type: none"> the Project activities and improved wastewater treatment services during operations; wider coverage of the city with sewerage services; improved environmental, sanitation and health conditions, including reduced risks of waterborne diseases; <p>May be potentially affected by:</p> <ul style="list-style-type: none"> possible emergency discharges of untreated water into the Goshgar river; traffic during the construction stage as there would be an additional load on the roads leading to the Project area; an increase in the risk of road traffic accidents (during the construction stage). <p>May be interested in:</p> <ul style="list-style-type: none"> information about the Project, its progress, and its E&S impacts; employment opportunities during the construction and operation phases; sanitation tariffs remain affordable, especially for lower-income households. 	Low
Potentially vulnerable groups		

²² The size of the Sanitary Protection Zone may vary from 250m to 1000m depending on the technological solutions, local conditions, expected E&S impacts, and would be determined by the competent environmental and health authorities.

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
Women-headed households, single-parent families, pensioners, families with disabled members, households officially recognized as living in poverty	May be interested in: <ul style="list-style-type: none"> information about new tariffs; employment opportunities, including special opportunities for women; information about security measures during construction and operation of the WWTP; information about the Project, its progress, and its E&S impacts. 	Medium to Low
Children attending schools close to the site, children living in the settlements that are crossed by the existing and connecting roads or that will be located close to the construction sites <i>Note: the closest school is appr. 750 m from WWTP site</i>	May be exposed to risks related to traffic to/from the Project's construction sites and need tailored information on road safety, construction activities, community health and safety risks and benefits, and precautionary measures for children during construction.	Low
Potentially affected organizations		
Public and private enterprises and other organizations within the sewage covering area connected to the WWTP	Will benefit from: <ul style="list-style-type: none"> the Project activities and improved wastewater treatment services during operations; wider coverage of the city with sewerage services; improved environmental, sanitation and health conditions, including reduced risks of waterborne diseases; May be potentially affected by: <ul style="list-style-type: none"> additional investments in infrastructure upgrades to ensure their wastewater meets the required standards for discharge into the system; temporarily disruptions of business operations at the construction phase. May be interested in: <ul style="list-style-type: none"> understanding the connection fees, usage tariffs and maintenance costs associated with the sewage system; technical assistance, including trainings or subsidies to meet the quality standards; information about the Project, its progress, and its E&S impacts; participation in public consultations and meetings. 	Medium
Local businesses (including greenhouse nearby) <i>Note: the closest business (greenhouse infrastructure) in appr. 700 m from the WWTP</i>	May be potentially affected by: <ul style="list-style-type: none"> increased air pollution and noise during the construction works. May be interested in: <ul style="list-style-type: none"> information about the Project, its progress, and its E&S impacts; participation in public consultations and meetings. 	Medium to Low
INTERESTED PARTIES		
National authorities		
Azerbaijan State Water Resources Agency (ASWRA)	The government agency responsible for the management of water resources in Azerbaijan and the beneficiary of the EBRD loan, which will implement the project. Will be interested in: <ul style="list-style-type: none"> successfully implementing the project to meet government's targets for improving urban wastewater infrastructure; implementing infrastructure projects using innovative and environmentally-friendly solutions; improving its technical expertise and operational capacity to implement projects funded by the International Financial Institutions, such as the EBRD and others; establishing partnerships with the International Financial Institutions 	High

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
	<p>to implement large-scale infrastructure projects.</p> <p>ASWRA will:</p> <ul style="list-style-type: none"> • serve as the primary beneficiary and implementing agency for the project design and construction; • review and provide input on the ESIA process and obtain the national EIA approval; • collaborate with other government agencies, local authorities, and communities; • be responsible for stakeholder engagement during planning and construction phases; • be involved in the community consultations and dissemination of information about the Project. 	
<p>Ministry of Ecology and Natural Resources, including its bodies:</p> <p>-State Environmental Safety Service and its regional department in Ganja;</p> <p>-Agency of State Environmental Expertise</p>	<p>The government agency that</p> <ul style="list-style-type: none"> • develops and implements the state policy in the field of environmental protection, organization of nature management, efficient use of groundwater, minerals and surface natural resources, their restoration, as well as observation and forecasting of hydrometeorological processes, including climate change; • maintains state environmental control over the use of the environment and natural resources, including ensuring environmental safety and preserving biological diversity; • through its subordinate organisation and regional branches, holds administrative authority over project approval processes in accordance with environmental protection laws and monitors environmental performance during the project's operational phase; • responsible for issuing the necessary environmental permits and approving the project's EIA; <p>Agency of State Environmental Expertise: carries out a state environmental expertise of projects/facilities; issues conclusions on the EIA documentation; approves environmental limits including waste generation and disposal, wastewaters discharge; provides opinions on spatial planning documents, land categories, and transitions between land categories.</p> <p>The Agency of State Environmental Expertise must be engaged or consulted during the design and implementation stages of the Project to ensure compliance with national legislation throughout the project's implementation and operational phases.</p>	Medium to High
<p>Ministry of Emergency Situations and its regional department in Ganja</p>	<p>May be interested in:</p> <ul style="list-style-type: none"> • ensuring the WWTP is robust and reliable, minimizing the risk of system failures that could trigger emergencies; • construction of disaster-resistant infrastructure to natural hazards, such as earthquakes. <p>Would probably be involved in:</p> <ul style="list-style-type: none"> • assisting in the identification of possible risks and the development of contingency plans to deal with potential emergencies arising from the construction and operation of the WWTP; • issuing conclusions on compliance with safety standards; • requiring prompt notification in the event of an emergency or accident at the construction and operation phases; • inspecting and monitoring WWTP during the operational phase to ensure that safety measures are in place and being followed. 	Medium to High
<p>Ministry of Health and sanitary and epidemiological services</p>	<p>May be interested in:</p> <ul style="list-style-type: none"> • ensuring that the Project aligns with national strategies, including Sustainable Development Goals (SDGs) (primarily focus on SDG3: Good health and well-being, and SDG6: Clean water and sanitation); • reducing health risks associated with poor water quality and 	Medium to High

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
	<p>inadequate sanitation;</p> <p>Would probably be involved in:</p> <ul style="list-style-type: none"> defining and approving a Sanitary Protection Zone of the WWTP; issuing the necessary health-related standards and permits throughout the project's design, construction, and operations; controlling the sanitary-epidemiological situation around the WWTP and workplace health protection measures. 	
Ministry of Agriculture and Food	<p>May be interested in:</p> <ul style="list-style-type: none"> ensuring that the Project is aligned with national strategies; improving food security and promoting sustainable rural development; increasing the productivity of agricultural lands. <p>Would probably be involved in:</p> <ul style="list-style-type: none"> supporting the development of solutions for the use of treated wastewaters and sludge in agricultural practices; training farmers on the benefits and techniques of using treated wastewaters and sludge; establishing standards and monitoring mechanisms to ensure that treated wastewater and sludge meet agricultural safety requirements. 	Medium
Azerbaijan Water Amelioration and Management OJSC	<p>Would probably be involved in:</p> <ul style="list-style-type: none"> discussing the technical feasibility of crossing the effluent pipeline with the Shemkir irrigation canal; issuing the technical requirements for construction works near the Shemkir irrigation canal; monitoring the implementation of the technical requirements during the design and construction phases. 	Medium
State Tourism Agency of the Republic of Azerbaijan	<p>Would probably be involved in:</p> <ul style="list-style-type: none"> consulting to ensure the WWTP design accounts for the needs of tourism development in Ganja. discussing mitigation measures to maintain a positive visitor experience during the Project's construction. 	Low
Electricity supply organizations: Azerenerji OJSC and Azerishiq OJSC	Both institutions will provide technical requirements for connecting the WWTP to the power grid and will oversee their implementation throughout the design and construction phases.	Low to Medium
The State Land and Cartography Committee of Azerbaijan Republic	<p>Would probably be involved in:</p> <ul style="list-style-type: none"> providing cadastral data, ensuring that the land designated for the WWTP is consistent with national land use policies; assisting with resettlement (if necessary) and providing people with the necessary land title documents. 	Low to Medium
State Committee for Urban Planning and Architecture	<p>May be interested in:</p> <ul style="list-style-type: none"> ensuring that the Project is aligned with national strategies. <p>Would probably be involved in:</p> <ul style="list-style-type: none"> ensuring compliance with zoning regulations; issuing necessary construction permits. 	Low to Medium
Regional/city/district authorities		
Ganja City Executive Authority, Samukh Executive Authority (Local authority)	<p>May be interested in:</p> <ul style="list-style-type: none"> successful project's completion and long-term operation of modernized and built infrastructure; improving the inhabitant's health and quality of life, including access to better sanitation; attracting investments for the upgrade of municipal infrastructure; implementing the Green City Plan, Master Plan and improving urban KPIs (SDG11). <p>Local authority would:</p> <ul style="list-style-type: none"> provide administrative assistance, including obtaining permits, land 	High

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
	allocation for infrastructure and resolving bureaucratic hurdles during the design and construction phases; • assist with organizing community consultations and collection of feedbacks on the project; • oversee the project's implementation within the predetermined budget and timeframe; • distribute and collect public grievance forms related to Project; • sending official notifications to affected persons about land acquisition; • pay full compensation to the affected persons; • assist in relocation of affected persons.	
Local municipalities (self-government institutions): Ganja, Samukh, Ziyadli, Sarkar	Would probably be involved in: • participating in the consultation process to gather input from residents, businesses and community leaders in Ganja and Samukh on their specific wastewater management challenges; • distributing information on the E&S impacts of the project; • distributing and collecting the public grievance forms related to Project; • monitoring progress of project implementation.	Medium to High
Regional Department N10 of Ecology and Natural Resources, Ganja city	Would probably be involved in: • monitoring the environmental quality in Ganja city. • controlling the Project's compliance with environmental regulations and standards. • ensuring the efficient use of natural resources within its jurisdiction.	Medium to low
ASWRA (regional division in Ganja)	Would probably be involved in: • stakeholder engagement and solving of grievance during the design, construction and operation phases of the Project; • operation of the WWTP.	Medium to High
Ganja division of Agency for Sustainable and Operational Social Security	Would probably be involved in: • consulting on the environmental and social impacts of the WWTP and ensuring that the rights of vulnerable communities are adequately addressed; • supporting stakeholder engagement by disseminating information about the WWTP project, particularly to affected groups and vulnerable communities, and organising meetings and workshops with local communities to gather feedback and address concerns; • providing training (if necessary) to equip local workers with the necessary skills for construction and operational roles; • distributing and collecting the public grievance forms related to Project; • monitoring progress of project implementation.	Medium
Ganja City Housing and Communal Production Union/ Service	Would probably be involved in: • consulting during the design and construction stages; • distributing the public grievance forms related to Project.	Low
Communities		
Community leaders / Elderly committees (aghsakals) in particularly Ziyadli village	Have deep local knowledge and hold significant authority among community members. Their primary interest is: • to ensure the well-being of the community during both the construction and operation phases of the Project; • keen to understand and promote the Project's benefits, including improved sanitation and potential employment opportunities for the community. Will play a vital role in the Project by facilitating the dissemination of	Medium to High

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
	accurate and timely information about construction activities, Project benefits, and employment opportunities, ensuring residents are well-informed and engaged throughout the process.	
Non-commercial organizations (non-governmental organizations (NGOs), mass media, academia and others)		
NGOs (including "Ekoloji Renesans" İctimai Birliyi, Gəncə Ekologiya Fondu, Gəncə Regional Sosial İqtisadi Araşdırmalar" İctimai Birliyi, Yerli Təşəbbüslər Mərkəzi" İctimai Birliyi, "Tamas" Regional Public Union and others)	May be interested in: <ul style="list-style-type: none"> positive E&S outcomes through the Project's implementation; ensuring the Project aligns with environmental priorities, SDGs, biodiversity protection, sustainable water management and human rights, with a focus on safeguarding vulnerable groups; acting as independent watchdogs to monitor the Project progress and ensure stakeholder's views and suggestions regarding the Project are considered and addressed; ensuring that project information is accessible and that stakeholders are informed about the project's progress and impacts; empowering youth to actively participate in Ganja's environmental and infrastructural development; organizing workshops or training sessions on sustainable wastewater treatment in Ganja for diverse stakeholder groups; using the disclosure Project materials for awareness trainings on water issues. 	Low to Medium
National, regional and district media (including Trend.az, Azernews.az, Report.az, and News.az and others)	May be interested in: <ul style="list-style-type: none"> learning about the Project, its progress, and its environmental, social and economic impacts; collaborating with the Company to share its activities and provide information to the public and other stakeholders; exploring human stories, like how the Project improves daily life for different groups of Ganja residents. 	Low to Medium
Academic and research institutions: -Ganja Division of Azerbaijan National Academy of Science; -Ganja State University; -Azerbaijan State Agricultural University; -Azerbaijan Technological University.	May be interested in: <ul style="list-style-type: none"> conducting research studies related to sludge management and wastewater treatment technologies being engaged in the Project consultations/discussions, especially at the design stage. 	Low to Medium
Health providers (hospitals, medical points in identified settlements) <i>Note: Closest identified health provider in Garayeri village, 2.3 km from the WWTP site</i>	May be interested in: <ul style="list-style-type: none"> positive E&S outcomes through the Project's implementation; Improvement of sanitary services in the region. 	Low
Commercial organizations		
Contractors and subcontractors	Will be interested in: <ul style="list-style-type: none"> correspondence to Social and Environmental Requirements of EBRD; receiving information about tenders in advance; receiving contracts and improving company reputation; timely and qualified implementation of works. 	Low to Medium
International Financial Institutions		
European Bank for Reconstruction and Development (EBRD)	<ul style="list-style-type: none"> provides funding for the construction of WWTP; oversees compliance with social, environmental, and safety standards throughout the Project; monitors progress and implementation to ensure alignment with objectives and timelines; initiates and evaluates Environment, Health, Safety, and Social (EHSS) documentation; approves contract awards and authorizes the signing and initiation of civil works. 	High

Stakeholder/ stakeholder group	Relation to the Project / Interests / Concerns	Impact or Influence level
International initiatives and projects		
Covenant of Mayors for Climate and Energy– Europe ²³	May be interested in: <ul style="list-style-type: none"> • participating in project consultations/discussions, especially in the design phase on adaptation and energy efficiency issues; • disseminating information about the projects; • collaborating on possible joint actions. 	Low

6 STAKEHOLDER ENGAGEMENT PROGRAMME

The preliminary Stakeholder Engagement Programme (**Table 3**) has been prepared to ensure the successful information disclosure, communication, and interaction process with the various stakeholder groups.

The Programme covers the Project design and pre-construction and construction phases. It provides a specific action plan with the distribution of responsibilities and a timeframe for implementation of the suggested activities. If there would be changes during the Project implementation that require modification of the engagement mechanisms and / or new stakeholders are identified, the Programme should also be updated.

²³ <https://eu-mayors.ec.europa.eu/en/signatory/28209#contacts>

Table 3. Stakeholder engagement programme

No	Activity	Target Stakeholder group	Information Materials	Timeframe	Responsible party	Means of communication/ location
PROJECT DESIGN STAGE (2025-2026)						
1.	Developing and launching the Project's webpage on the Company's corporate website	All stakeholders	<ul style="list-style-type: none"> E&S Information about the Project, FAQ leaflets on the Project's E&S impacts and mitigations; E&S documents Newsletters, Tender information, Educational materials and others 	Maintained during the entire project cycle	ASWRA	Webpage on the ASWRA's website
2.	Establishment of a grievance mechanism and notification of the public on the established grievance mechanism	Potentially affected stakeholders	<ul style="list-style-type: none"> SEP, Scoping Report; Notification /information announcement 	April – May 2025	ASWRA	Webpage on the ASWRA's website
3.	Media coverage of the Project progress, planned activities, achievements, and any relevant E&S news	All stakeholders	<ul style="list-style-type: none"> Press-releases, Newsletters; Interviews. 	During the project life-cycle	ASWRA	<ul style="list-style-type: none"> Webpage on the ASWRA's website TV channels social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
4.	Scoping stage disclosure and consultations					
4.1	Announcement about the scoping consultations in Ganja and the villages of Ziyadli, Sarkar and Istixana <i>Alternatively, village representatives can be invited to Ganja</i>	Potentially affected parties, other stakeholders	Brief information about the Project, venue, date, and time of the meetings	April – May 2025	The Consultant ASWRA	<ul style="list-style-type: none"> Webpage on the ASWRA's website social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
4.2	Disclosure of the Scoping Report and this draft SEP for 30 days: - in ASWRA's branch office in Ganja; - ASWRA's webpage	Potentially affected settlements Other stakeholders	<ul style="list-style-type: none"> Scoping Report This draft SEP 	April – May 2025	ASWRA with support of the Consultant	Verbal or written comments can be provided to the Company, ESIA Consultant or local authorities during the 30-day disclosure period.

4.3	Public scoping consultation meetings in: - Ganja - Ziyadli, - Sarkar - Istixana <i>Alternatively, village representatives can be invited to Ganja</i>	Potentially affected settlements; NGOs, media, academia, and any stakeholders	Scoping Report and this draft SEP (in English and Azerbaijani)	April – May 2025	The Consultant, with support of ASWRA and local authorities	Personal participation and communication; meeting with a possibility to get immediate feedback
4.4	Collection and analysis of stakeholder comments after a 30-day disclosure	n/a	n/a	May - June 2025	The Consultant, with inputs from ASWRA and local authorities	Follow-up calls or meetings by the Consultant to clarify the comments and/or provide the requested information.
5	Draft ESIA disclosure and consultations					
5.1	Announcement about the ESIA consultations in Ganja and the villages of Ziyadli, Sarkar and Istixana <i>Alternatively, village representatives can be invited to Ganja</i>	Potentially affected parties, other stakeholders	Brief information about the project, venue, date, and time of the meetings	August 2025	The Consultant ASWRA	<ul style="list-style-type: none"> • Webpage on the ASWRA's website • social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
5.2	Disclosure of the ESIA package for 120 days: - in ASWRA's branch office in Ganja (hard copy); - ASWRA's webpage; - EBRD' website - administrative building of local authorities (hard copies only the SEP and NTS in Azerbaijani)	Potentially affected settlements Other stakeholders	Draft ESIA package: SEP, ESIA report, NTS, ESMP, ESAP and potentially Resettlement Framework (English and Azerbaijani)	August 2025	ASWRA with support of the Consultant	Provision of written or verbal comments to the Company, the ESIA Consultant or local authorities during the 120-day disclosure.
5.3	ESIA public consultation meetings in: - Ganja - Ziyadli, - Sarkar - Istixana <i>Alternatively, village representatives can be invited to Ganja</i>	Potentially affected settlements; NGOs, media, academia, and any stakeholders	Draft ESIA package: SEP, ESIA report, NTS, ESMP, ESAP and potentially Resettlement Framework	October or early November 2025	The Consultant, with support of ASWRA and local authorities	Personal participation and communication; meeting with a possibility to get immediate feedback

5.4	Collection and analysis of stakeholder comments during / after a 120-day disclosure	n/a	n/a	August - December 2025	The Consultant, with inputs from ASWRA and local authorities	Follow-up calls or meetings by the Consultant to clarify the comments and/or provide the requested information.
PRE-CONSTRUCTION STAGE (2026 -2027)						
6.	Notification on the commencement of construction works	Potentially affected stakeholders	<ul style="list-style-type: none"> • Notifications, • Press-releases; • TV; • Social media. 	Prior to the commencement of construction works	ASWRA, Local authorities	<ul style="list-style-type: none"> • Webpage on the ASWRA's website • TV channels • social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
7.	Informing the public on the traffic safety measures to be applied during the construction period	Residents of Ganja and any settlement through which the Project construction transport may pass	<ul style="list-style-type: none"> • Announcements, • Publications in local mass media; • Social media 	Prior to the construction works	ASWRA, Local authorities	<ul style="list-style-type: none"> • Webpage on the ASWRA's website • Local media channels • social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
8.	Installation of information boards with contact details of the person in charge of grievance mechanism implementation and boxes with the Public Grievance Forms	Residents of Ganja	<ul style="list-style-type: none"> • Informational billboards, • grievance forms 	Prior to the construction works	ASWRA, Local authorities	<ul style="list-style-type: none"> • Construction sites • Webpage on the ASWRA's website; • Building of local authority
9.	Prepare Frequently Asked Questions Leaflet outlining: (a) Project summary, (b) EHS impacts, risks and opportunities, (c) mitigations already adopted/to be implemented, (d) other questions asked during the Stakeholder engagement events	All stakeholders	<ul style="list-style-type: none"> • Leaflet 	Prior to the construction works	ASWRA	<ul style="list-style-type: none"> • Webpage on the ASWRA's website • social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
CONSTRUCTION STAGE (2026-2029)						
10.	Keeping a record of the received grievances (suggestions and inquiries) in the specific logbook(s) <i>Note: this is continued starting with the scoping stage – activity 2 above.</i>	All stakeholders	Grievance (Suggestion and Inquiry) Logbook	Throughout the Project lifecycle	ASWRA	Personal responses / resolutions

11.	Provision of updates on the Project's status / progress <i>Note: this is continued starting with the scoping stage – activity 1 above.</i>	All stakeholders	<ul style="list-style-type: none"> Project's progress publications, Announcements, Publications in local mass media; Social media 	Throughout the Project lifecycle	ASWRA	<ul style="list-style-type: none"> Webpage on the ASWRA's website social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
12.	Organization of meetings and consultations with the stakeholders on the topics raised by the stakeholders when needed	All stakeholders	<ul style="list-style-type: none"> Specific information depending on the topics of interest 	Throughout the Project lifecycle	ASWRA, Local authorities	<ul style="list-style-type: none"> Conduct meetings in a remote / online format
13.	Updating SEP based on its monitoring and evaluation	All stakeholders	<ul style="list-style-type: none"> Adjustments to SEP, Notification; Information announcement 	Throughout the Project lifecycle	ASWRA	<ul style="list-style-type: none"> Webpage on the ASWRA's website
14.	Preparation of annual reports on the E&S performance of the Project	All stakeholders	<ul style="list-style-type: none"> A short summary report Publications in local mass media; Social media 	Once a year during the Project life-time	ASWRA	<ul style="list-style-type: none"> Webpage on the ASWRA's website social media platforms (such as Facebook, Twitter, Instagram, Telegram, YouTube)
15	Preparation of annual E&S monitoring reports for the EBRD	EBRD	<ul style="list-style-type: none"> Report as per the EBRD format 	Annually during the Project re-payment period (or as will be agreed with the EBRD)	ASWRA	<ul style="list-style-type: none"> Internal submission to the EBRD
OPERATIONAL STAGE (from 2030 onwards)						
	<ul style="list-style-type: none"> Continue with items 1, 3, 10, 11, 12, 13, 14 and 15 during the Project operations. In case of major rehabilitation works, re-launch the relevant items from 'Project Design Stage', 'Project Pre-construction' and/or 'Construction Stage' In addition – see below: 					
16.	Coordination regarding wastewater services (enterprises and citizens of Ganja)	Potentially affected parties and users of WWTP services	<ul style="list-style-type: none"> Specific information depending on the issue 	When needed during operations	ASWRA	<ul style="list-style-type: none"> Correspondence and Official Letters; Individual / Internal Meetings (if required)
17.	Coordination on environmental and security compliance for the WWTP, including inspections and audits	State authorities; Regional/city/district authorities	<ul style="list-style-type: none"> Specific information depending on the issue 	When needed during operations	ASWRA	<ul style="list-style-type: none"> Correspondence and Official Letters; Individual / Internal Meetings (if required)

7 GRIEVANCE MECHANISM

In line with EBRD requirements, the Client must establish an effective Project Grievance Mechanism early in the project development process to identify and address stakeholders' concerns related to the project. Accordingly, ASWRA will develop a Project Grievance Mechanism for external stakeholders²⁴, using existing communication and engagement channels and enhancing them with actions to fulfil EBRD standards (Figure 4). The Company will inform all stakeholders about the Project Grievance Mechanism as soon as it is established.

Currently, grievances and requests are received by ASWRA through the following channels²⁵:

- The 955-hotline operated by the ASWRA call centre (central level), with transfer of relevant calls to ASWRA in Ganja. The call centre in Baku operates 24 hours, all 7 days of the week, while ASWRA in Ganja operates from 9:00-21:00, all 7 days of the week;
- ASWRA's website, with transfer of relevant grievances and requests to ASWRA in Ganja;
- The Online Public Monitoring Platform: www.enezaret.az, with transfer of relevant grievances and requests to ASWRA headquarters and ASWRA in Ganja;
- Social media, such as Facebook, Telegram, Instagram, etc;
- Grievances received at the office of ASWRA in Ganja.

ASWRA will maintain the existing practice and supplement it, as described below.

Grievances and suggestions can be submitted to ASWRA in writing using a sample Public Grievance Form provided in Annex 1. Such forms will be published in English and Azerbaijani in electronic format on the ASWRA's website and/or Project's webpage, and they will also be available in printed form near the boxes for grievances and appeals located in the ASWRA's office in Ganja, Ganja executive administration and others.

Grievances received by phone, e-mail, mail, text messages (SMS), via instant messengers and/or social media accounts will also be registered and considered. Reporting a grievance is free and does not require payment.

Grievances and suggestions can also be addressed to ASWRA using the following contact details:

Name: Mr. Javid Mehdiyev

Position: Head of International Projects Management Sector, Administration of Facilities under Construction PLE, ASWRA

Address: 69 A Moscow Ave, 5th floor, Baku, Azerbaijan, AZ1012

Email: cavid.mehdiyev@toom.gov.az

Office tel.: +994124314767 (1094)

Mobile tel.: +994505929276

Fax: +994 12 4935165

As per the Law "On the Procedure for considering appeals of citizens" of September 30, 2015 (Article 6), **anonymous grievances** are not considered. However, EBRD requires that the grievance mechanism would allow for anonymous complaints to be raised and addressed.

²⁴ A separate mechanism is developed to address worker grievances.

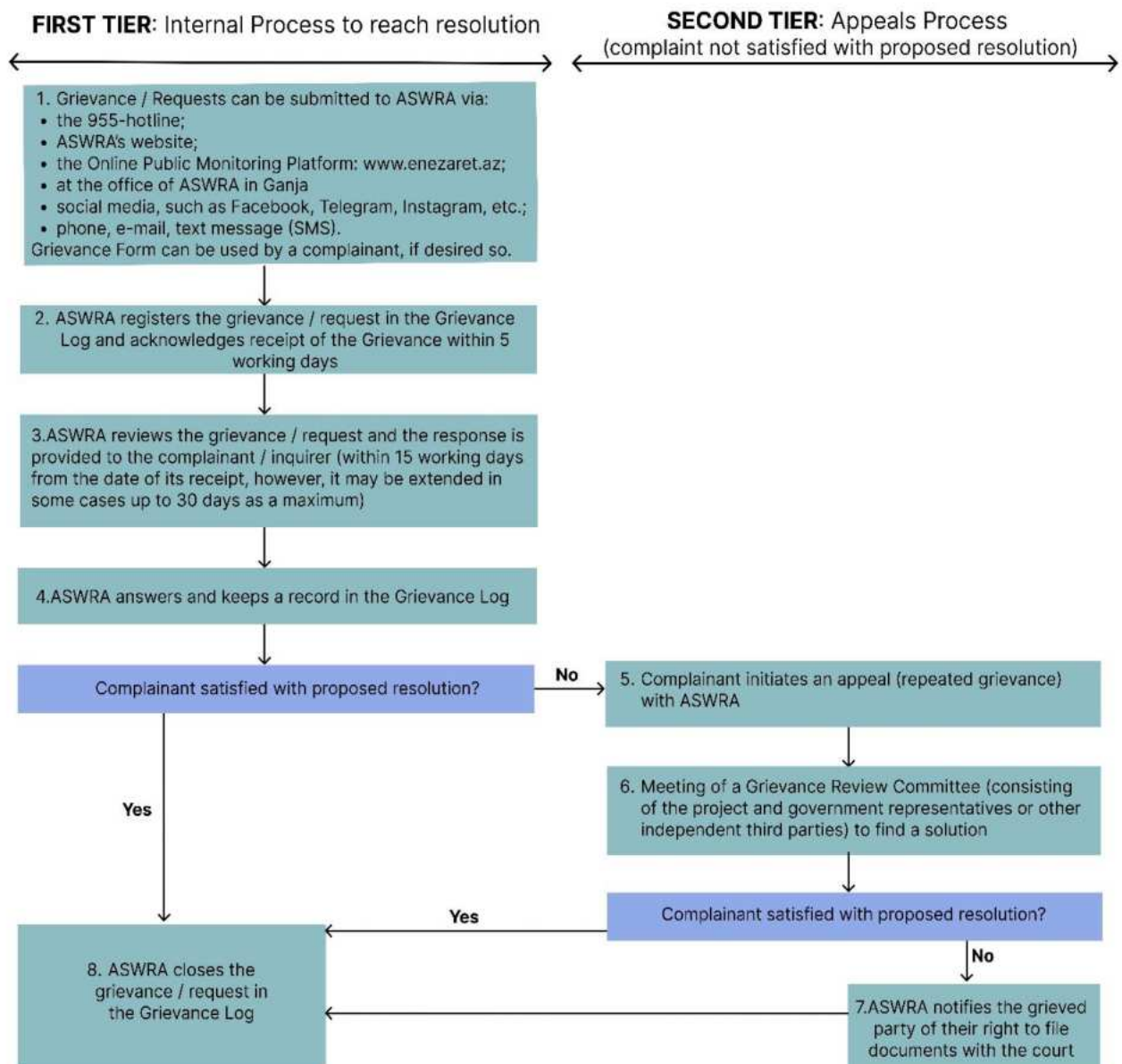
²⁵ Sweco, 2024 Stakeholder engagement plan for project water reservoirs and pipe components.

To address this gap, ASWRA accepts that **grievances can also be submitted anonymously**. If a complainant prefers to submit a grievance anonymously or through a third-party, this will be accepted. However, it is recommended to share contact details of the applicant so that the Company was able to provide a written response to the grievance.

According to the national legislation, the duration of the administrative procedure initiated by an appeal is 15 working days from the date of its receipt, however, it may be extended in some cases but up to 30 days as a maximum.

All the grievances addressed to the Company will be recorded in a Grievance (and Inquiry) Log, which should be maintained and analysed throughout the Project life-cycle.

ASWRA will also establish **the recourse mechanism**, including establishing a grievance review committee. Where a complainant is not satisfied with the proposed resolution offered then they can appeal.



Source: prepared by the Consultant

Figure 4. Project Grievance Process Chart

The complainant will contact ASWRA stating that they would like to raise an appeal to the resolution proposed as they are not satisfied with it. A grievance review committee will meet.

The committee will include the project and government representatives or other independent third parties. The committee will study the complaint and the refused proposed resolution and consider if another solution is appropriate. Any alternative resolution will be discussed with the complainant. Where no alternative resolution is identified during the appeal this shall be communicated to the complainant.

8 MONITORING, EVALUATION AND REPORTING

Successful stakeholder engagement depends on continuous effort, performance monitoring and evaluation, and adaptation to changing conditions and stakeholder information needs. To successfully organise, implement, evaluate, and report on stakeholder engagement activities, ASWRA and its regional office in Ganja will have a dedicated person in charge of these processes.

The monitoring process will ensure that all stakeholders are appropriately and effectively consulted throughout the engagement lifecycle. This ongoing evaluation will enhance the efficiency of stakeholder engagement activities.

Consultation and stakeholder engagement will be maintained throughout **the planning, construction, and operation phases** of the project.

The following indicators will be used for monitoring and improving stakeholder engagement performance in support of the Project implementation:

- The SEP is kept up-to-date and available to the public for review/commenting;
- Actions listed in the SEP are completed in full and as scheduled;
- The topics that were discussed and the questions that were raised during the public consultations;
- Number of stakeholders' comments and suggestions about the Project received by ASWRA through various feedback channels (disaggregated data by gender and location);
- Number of stakeholders' grievances and claims received by ASWRA in relation to the Project (disaggregated data by gender and location);
- Number of publications on the Project implementation process in local, regional, and national media;
- Key categories of grievances received by the ASWRA or its contractors (employment, permanent or temporary land use, environmental issues, labour relations, etc.);
- Number of grievances resolved within the maximum established timeline;
- Number of grievances remaining unresolved;
- Average time (in days) taken to propose a resolution, compared against the set timeframe;
- Changes in the number of grievances per category compared to previous reporting periods (e.g., monthly, quarterly, or annually).
- Total number of anonymous grievances received in the reporting period (disaggregated data by gender and location, if possible);
- Trend in the number of anonymous grievances compared to previous reporting periods (e.g., increase/decrease in percentage or raw numbers).

Stakeholder engagement activities should be recorded in a special log ([Annex 2](#)). All consultations will be documented, and minutes will be prepared, detailing the date, location, purpose of the meeting, participants, and discussion topics. Original written correspondence, including comments, will be preserved as evidence of the consultation process and outcomes.

Meeting minutes, as well as summaries of individual or informal discussions, will be maintained on file and available upon request.

The results of the stakeholder engagement process will be analysed monthly and quarterly, and a summary of the analysis will be included in the annual E&S reports submitted to the EBRD by ASWRA.

The SEP is considered as a living document and should be periodically evaluated by the ASWRA to identify activities that might need any corrective and/or preventative measures with the purpose to improve the efficiency of its performance. In such cases the SEP should be updated and shared with the public with the amendments made.

If there are significant changes to the Project that result in additional or different E&S risks and impacts to project-affected parties, the Company will conduct additional consultations about how these risks and impacts will be mitigated.

Annex 1. EXAMPLE PUBLIC GRIEVANCE FORM

Reference No. (for internal purpose)	
Full name:	First name _____ Last name _____ <input type="checkbox"/> I request not to disclose my identity and contact details without my consent
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail)	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ <input type="checkbox"/> By telephone: _____ <input type="checkbox"/> By e-mail: _____
Preferred Language for communication	<input type="checkbox"/> Azerbaijani <input type="checkbox"/> Russian <input type="checkbox"/> Other, please specify _____
Description of Grievance	_____ _____ _____
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times?) _____ _____ <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see to resolve the problem?	_____ _____ _____
Signature:	_____
Date:	_____

Please return this form to:

ASWRA, Moskva avenue 67, AZ 1012 Baku, Azerbaijan
 Tel: (+99412) 431-47-67/87, WhatsApp (+994 55) 209 95 59
 Call centre: 955, Fax: (+99412)430-28-87
 E-mail: office@azersu.az
 Website: www.azersu.az

OR

ASWRA Ganja
 Ganja, Üzeyir Hacıbəyov str. 76, AZ2001
 Tel: (+99422) 255-77-29, (+99422) 265-00-09

Annex 2. TEMPLATE OF A STAKEHOLDER ENGAGEMENT LOG

ID/No.	Engagement Activity	Participants	Stakeholder Category	Date	Location	Initiated by	Number of participants (women / men)	Engagement purpose	Topics discussed and actions agreed	Minutes of Meeting ref.
1										
2										
3										
...										