CONSTRUCTION OF LAVNA COAL TRANSSHIPMENT TERMINAL
(MURMANSK REGION, RUSSIAN FEDERATION)

STAKEHOLDER ENGAGEMENT PLAN

Ecoline Environmental Assessment Centre

Moscow 2018
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Prepared for: Black Sea Trade and Development Bank (BSTDB)

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**LIST OF ABBREVIATION**

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
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<tbody>
<tr>
<td>BSTDB</td>
<td>Black Sea Trade and Development Bank</td>
</tr>
<tr>
<td>CTT</td>
<td>coal transshipment terminal</td>
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<tr>
<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<tr>
<td>EHS</td>
<td>environmental, health and safety</td>
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<tr>
<td>ESAP</td>
<td>Environmental and Social Action Plan</td>
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<tr>
<td>ESIA</td>
<td>Environmental and Social Impact Assessment</td>
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<tr>
<td>IFC</td>
<td>International Financial Corporation</td>
</tr>
<tr>
<td>IFs</td>
<td>International finance institutions</td>
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<tr>
<td>LLC</td>
<td>Limited Liability Company</td>
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<tr>
<td>MTH</td>
<td>Murmansk Transport Hub</td>
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<tr>
<td>NGO</td>
<td>non-governmental organization</td>
</tr>
<tr>
<td>NTS</td>
<td>non-technical summary</td>
</tr>
<tr>
<td>OVOS</td>
<td>National Environmental Impact Assessment (Russian abbreviation); abbreviated name</td>
</tr>
<tr>
<td>RAS</td>
<td>Russian Academy of Sciences</td>
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<tr>
<td>KAE</td>
<td>Kola Archaeological Expedition</td>
</tr>
<tr>
<td>RF</td>
<td>Russian Federation</td>
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<tr>
<td>SEP</td>
<td>Stakeholder Engagement Plan</td>
</tr>
<tr>
<td>SMEs</td>
<td>small and medium enterprises</td>
</tr>
<tr>
<td>STLC</td>
<td>State Transport Leasing Company</td>
</tr>
<tr>
<td>ToR</td>
<td>Terms of Reference</td>
</tr>
<tr>
<td>UNECE</td>
<td>United Nations Economic Commission for Europe</td>
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1. **INTRODUCTION**

The State Transport Leasing Company (STLC) is financing construction of a greenfield Lavna Coal Transshipment Terminal (“the Lavna CTT” or “the Terminal”) in the Kola Bay in the Murmansk Region (“the Project”).

The STLC established Lavna Commercial Sea Port LLC (“the Company” or “the Project Proponent”) to undertake construction and operate the future Terminal. As a Project Proponent, Lavna Commercial Sea Port LLC received the construction permit and all necessary approvals for the site preparation works; the works are underway since July 2018.

The STLC applied to the Black Sea Trade and Development Bank (“BSTDB” or “the Bank”) to raise external investments to the Project.

BSTDB requires that all projects supported by it should comply with environmental and social requirements of BSTDB Environmental and Social Policy (2014) and the applicable international standards, in addition to the relevant national laws and regulations.

All operations financed by BSTDB are subject to environmental and social assessment. According to BSTDB Environmental and Social Policy, the Project is categorized as a Category A development, therefore being subject to Environmental and Social Impact Assessment (ESIA) and requiring preparation of the following documents:

- Environmental and Social Impact Assessment (ESIA) Report;
- Non-technical summary (NTS);
- Environmental and Social Action Plan (ESAP); and
- Stakeholder Engagement Plan (SEP).

This document is the initial Stakeholder Engagement Plan (the SEP, or “the Plan”) presenting the planned stakeholder consultation and engagement process for the Project. It outlines a systematic approach to stakeholder engagement that will help Lavna Commercial Sea Port LLC develop and maintain constructive relationships with their stakeholders throughout the Project lifetime. The SEP will be regularly monitored, reviewed and updated by on annual basis as minimum based on the results of reviewing the stakeholder engagement process.

The SEP includes:

- Review of regulatory framework for stakeholder engagement on the Project;
- Review of previous stakeholder engagement activities/experience of the Project Proponent;
- Preliminary identification of Project stakeholders and vulnerable groups in particular;
- Proposed Stakeholder Consultations and Engagement Program;
- Proposed external grievance/feedback mechanism; and
- Monitoring and reporting provisions.
2. PROJECT DESCRIPTION

The Lavna CTT’s site is located in the Murmansk Region, the Kola District, on the western shore of the southern knee of the Kola Bay, in the Lavna River mouth (Figure 1). The Terminal will occupy an area of 108 ha. The Project site is situated within the administrative boundaries of Mezhdurechye Rural Settlement. The nearest settlements are Mezhdurechye and Mishukovo Villages located at a distance of more than 500 m of the site.

![Figure 1. Project Location Map](image)

The Terminal is a crucial component of the Project for Integrated Development of the Murmansk Transport Hub (MTH). The proposed MTH is a year-round deep sea marine hub handling various types of cargoes to be integrated into the North-South international transport corridor. As part of the MTH development it is planned to: i) build a coal terminal (Lavna CTT) and an oil terminal, as well as and the Vykhodnoy – Lavna public railroad on the western coast of the Kola Bay, and ii) renovate the existing CTT of the Murmansk Commercial Sea Port on the eastern coast of the Kola Bay. It is *inter alia* planned to relocate the coal transshipment operations to the western coast of the bay and establish a container terminal on the site of the existing CTT. The existing and proposed MTH facilities are shown on Figure 1.
The Lavna CTT is designed to be a modern high technology specialised terminal handling 18 million tonnes of coal per annum to serve the following purposes:

- Increase energy coal exports through the development of new coal transfer capacities across the Russian Federation;
- Shift freight flows from the Baltic ports to the Russian ports;
- Provide access to new coal markets due to possibility to accommodate vessels of high capacity.

The key advantages of the Project are as follows:

- The Project occupies a greenfield site;
- The Terminal has a deep ice-free area protected against storms and is able to accommodate vessels with a deadweight of over 150,000 tonnes;
- It provides direct access to the ocean without the need to pass through the waters of other countries;
- It is located close to the European and American markets.

The coal will be transported to the Lavna CTT via a new railroad which is being currently built for this purpose but is not a part of the Project. The coal will be unloaded in closed hangars, temporarily stored in the outdoor stockpiles and then transferred to vessels via closed conveyors and shipped further by sea.

The Project’s design provides for advanced preventive and mitigation measures to effectively control coal dust emissions. Modern transshipment equipment from market leaders such as the Thyssenkrupp Industrial Solutions AG (Germany) is planned to be installed at the Terminal.

Phase 1 of the Lavna CTT with the capacity of 9 million tonnes of coal per annum is planned to be commissioned in 2020. The Terminal’s capacity will be doubled to reach 18 million tonnes of coal per annum after the completion of the Project. The new coal terminal will increase the capacity of the Murmansk Commercial Sea Port (which handled 51.7 million tonnes in 2017) and create at least 600 new jobs.

The associated projects that are critical for to the construction and operation of the Terminal are as follows:

- Construction of the Vykhodnoy – Lavna public railroad on the western coast of the Kola Bay; financed by the Government);
- Dredging works in the Projects marine area;
- Construction of the access railroad connecting Lavna Railway Station and the Project’s site.
3. REGULATORY FRAMEWORK FOR STAKEHOLDER ENGAGEMENT

This SEP is based on the stakeholder engagement requirements of the Russian legislation, the applicable BSTDB’s policies, international conventions, and good international practice provisions.

3.1. Russian Legislation

In the Russian Federation (RF), public consultations for investment projects are carried out within the framework of the Environmental Impact Assessment (EIA) process (OVOS¹ in Russian). As the Project is subject to the State Environmental Review (SER)², the EIA for it shall be organized according to the OVOS Regulation³.

According to this regulation, the EIA procedure consists of three stages, each including public consultation activities:

1. notification, preliminary assessment (scoping) and OVOS Terms of References (ToR) development;
2. EIA study and Draft EIA Materials preparation; and

The project developer is responsible for organizing public consultations process; he informs the public and ensures access to the information, addresses inquiries, and covers all related costs.

The local (municipal) authorities provide organizational support in conducting public meetings (if applied as a method for public consultations) including inter alia public hearings, referendums, and mediation committees.

For projects involving the land acquisition/land use change, a specific Public Hearings procedure as per RF Urban Planning Code⁴ also applies.

The requirements discussed above are largely harmonised with the requirements of international financial institutions (IFIs) on stakeholder engagement.

3.2. BSTDB Requirements

As it is declared in the BSTDB Environmental and Social Policy (2014)⁵, BSTDB considers transparency and accountability as the key elements of a sustainable business development. The Bank commits to disclose to the general public information on environmental and social performance of its operations, as per the provisions of this Policy, and require its Clients to engage in dialogue with their stakeholders, identify and interact with potentially affected communities, disclose relevant information about their business activities, consult them as appropriate,

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¹ OVOS is a Russian abbreviation for environmental impact assessment, a process to assess environmental and related socio-economic impacts of the planned activity and identify mitigation measures in accordance with the legislation of the Russian Federation.
³ Regulation on Assessment of Environmental Impact of Planned Economic and Other Activities in the Russian Federation (OVOS Regulation) approved by the Order of the State Environmental Protection Committee No. 372 of 16 May 2000 (registered by the Ministry of Justice No. 2302 on July 4, 2000). Available at http://base.garant.ru/12120191/
and ensure their informed participation. Furthermore, the BSTDB provides a grievance mechanism to manage concerns raised by the stakeholders potentially affected by its operations.

The BSTDB Public Information Policy (2018)\(^6\) sets the main principles and objectives of BSTDB in promoting public knowledge and understanding of its mission and activities. This policy is applicable to all BSTDB Business Units.

For Category A projects, the full-fledge ESIA is required, and the following documents are be prepared:

- Environmental and Social Impact Assessment (ESIA) Report;
- Non-technical summary (NTS);
- Environmental and Social Action Plan (ESAP);
- Stakeholder Engagement Plan (SEP).

NTS, ESAP and SEP are to be disclosed for national and international interested parties.

3.3. International Conventions


All projects financed by BSTDB shall comply with requirements of these two conventions no matter whether a project is located in a country being the convention signatory or not.

The Espoo Convention sets out the obligations of Parties – that is States that have agreed to be bound by the Convention – to carry out an environmental impact assessment of certain activities at an early stage of planning. It also lays down the general obligation of States to notify and consult each other on all major projects under consideration that are likely to have a significant adverse environmental impact across boundaries.

The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and transboundary environment. It focuses on interactions between the public and public authorities.

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The Aarhus Convention sets three rights of the public regarding environmental information:

- **Access to information**: public authorities, in response to a request for environmental information, make such information available to the public, within the framework of national legislation, including, where requested (…), copies of the actual documentation containing or comprising such information;

- **Public participation in decision making**: the public concerned needs to be informed, either by public notice or individually as appropriate, early in an environmental decision-making procedure, and in an adequate, timely and effective manner; and

- **Access to justice**: any person who considers that his or her request for information (…) has been ignored, wrongfully refused, whether in part or in full, inadequately answered, or otherwise not dealt with in accordance with the provisions of that article, has access to a review procedure before a court of law or another independent and impartial body established by law.

### 3.4. Good International Practice Resources

The International Finance Corporation’s (IFC) good practice publications are considered as a source of good practice guidance. The following IFC’s publications, which provide additional guidance for achieving good standards of stakeholder engagement, were used during the SEP preparation:

- The 2007 “Good Practice Handbook on Stakeholder Engagement”⁹; and

- The 2009 Good Practice Note on Addressing Grievances from Project-Affected Communities¹⁰.

The handbook describes key stakeholder engagement principles and approaches (in accordance with the IFC’s performance standards) and provides specific examples of implementing these approaches in different countries.

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4. STAKEHOLDER ENGAGEMENT EXPERIENCE OF LAVNA COMMERCIAL SEA PORT LLC

As Lavna Commercial Sea Port LLC was specifically established to implement the Project, its experience in stakeholder engagement is limited to public consultations and information disclosure performed as part of the Project’s EIA.

The Lavna CCT Project is part of the Project for Integrated Development of the Murmansk Transport Hub. The Public Hearings on the Murmansk Transport Hub Integrated Development Project were held on 28 September 2012 in Mezhdurechye and on 19 March 2012 in the administrative centre of the Kola District (Kola Town)\(^{11}\).

Public consultations on the Project were conducted according to requirements of the RF legislation as part the permitting process. The EIA for the Project was conducted in one stage.

Public consultations on the Lavna CTT Project included public hearings (one event) held by the local authorities in March 2018 in Kola Town The consultation event was announced in advance by:

- posting relevant information on the official website of the Kola District Administration\(^{12}\);
- publishing announcements in the regional (The Kolskoye Slovo, The Vecherniy Murmansk) and federal (The Rossiyskaya Gazeta) newspapers; copies of the newspaper issues with the published announcement are provided in Annex 1.

The EIA Materials were disclosed by:

- placing hard copies of the EIA Materials (OVOS) at the Department for Architecture, Construction and Roads of the Kola District Administration and at the Kola District Inter-Settlement Library;
- uploading an electronic copy of the EIA Materials at a webpage of the Department for Architecture, Construction and Roads of the Kola District Administration’s official website\(^{13}\).

The EIA Materials were discussed at the public hearings held at the Kola District Inter-Settlement Library on 20 March 2018. The questions and comments from the attendees are presented in the public hearings minutes provided in Annex 2. The minutes were made publicly available by posting the electronic copy of the document at the official website of the Kola District Administration\(^{14}\).

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\(^{14}\) The respective link is currently unavailable.
A series of publications on the EIA for the Project and the public hearings were posted at *Hibiny.com*, a regional electronic information resource and at the official website of Bellona Environmental NGO.

5. **STAKEHOLDER IDENTIFICATION AND ANALYSIS**

The approach to stakeholder identification and analysis is outlined below, followed by the overview of the identified stakeholder groups, as well as their concerns and expectations related to the Project.

5.1. **Methodology**

The stakeholder identification and analysis presented in this Plan is based on publicly available information sources, consultations with key stakeholders, and the ESIA Consultant’s own observations. The information on stakeholders should be amended and updated as the Plan evolves.

Project stakeholders are defined as those social groups whose interests may be affected by the Project or who express interest in participating in the discussion of the Project’s environmental and/or socio-economic aspects. These are groups with whom the Project Proponent (Lavna Commercial Sea Port LLC) will have to establish a long-term cooperation.

The preliminary stakeholder identification and analysis for the Project drew upon the following criteria:

- **Impact**: Project’s implementation may significantly affect a given social group (affected stakeholders/parties);
- **Influence**: the social group is able to substantially influence the Project implementation process;
- **Partnership**: there are opportunities for building partnership relations between the Project Proponent and a given social group; and
- **Expressed interest**: a group or individuals, not necessarily directly affected by the Project, may express (or not express) interest to it.

In line with the best practice guidance special attention was paid to the identification of vulnerable groups.

For the purpose of this SEP, stakeholders are conventionally divided into internal (working at the Company or for its key contractors, directly involved in and benefitting from the Project) and external (not working at the Company and not involved in the Project). The Project designers and subcontractors are not considered to be external stakeholders, but rather the Project implementers, and, thus, are not included in the engagement programme.

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5.2. **Stakeholder Identification**

The key Project stakeholders, and their concerns and expectations related to the Project are presented in Table 1 and discussed below.

**Affected communities**

The groups directly affected by the Project construction and operations include:

- The residents of Mezhdurechye and Mishukovo Villages:

These settlements are the closest ones to the planned Terminal (the distance from the terminal to each settlement is a little more than 500 meters). Though the legislatively required distance (500 meters for coal terminals) is followed, the terminal may affect the lifestyle of the residents of these settlements, for example, occupy, destroy or modify the recreational areas, pastures, hayfields, wild harvest gathering and hunting lands.

The following issues of concern were raised by the representatives of local communities during the public hearings on the Project:

- Whether the fish spawning periods and restrictions have been considered in the design;
- Access to the cemetery located in the area of the Project site;
- Whether a sanitary protection zone is going to be established;
- The number of stakeholder remarks to the initial Project design;
- The expected date of obtaining the permit from State Expert Review Authority (GlavGosExpertiza);
- The management of coal dust collected by the dust collection system at the Terminal;
- The need for dredging operations.

The Project Proponent provided answers to all issues raised in the public hearings minutes.

As stated by Head of the Mezhdurechye Rural Settlement Administration in the interview, local residents often ask him about their right to land plots occupied by them without a formal title or registration.

As stated by Head of the Mezhdurechye Rural Settlement Administration in the interview, local residents often ask him about their right to land plots occupied by them without a formal title or registration.

The existing practice in Russia entails these land plots are to be sold at auctions which contradicts with the IFIs policies including those adopted by BSTDB.

**Residents of the areas potentially affected by the construction of the associated facilities (the public Vykhodnoy – Lavna railroad and the access railroad to the Project site)**

A new railroad was critical to ensure stable operation of the terminals located on the western coast of the Kola Bay. To this end, a single-track electrified Vykhodnoy – Lavna railroad was designed as part of the first phase of the MTH development. This is a public railroad, and its construction is financed from the federal budget.

At the public hearings on the MTH development project held in 2012, the majority of attendees were against the construction of the Vykhodnoy – Lavna railroad crossing Molochny Settlement. Members of the Molochny community did not agree with the design of the public railroad. The proposed railway route ran along the existing railroad which had not been used since 1961. However, local residents
emphasised that there were residential houses built close to the route. They were also concerned by using the railroad for transportation of hazardous goods, coal and oil products. As a result, almost 300 residents of Molochny present at the public hearings voted against the railroad construction\(^\text{19}\). The railroad’s route was eventually changed to address concerns raised during the public hearings.

The route of the proposed access railroad to the Project site runs in the outskirts of the Mezhdurechye Rural Settlement. A number of Mezhdurechye residents whose houses are close to the route are concerned with the environmental implications of the access railroad construction and operation.

**Residents of the Kola District and in particular the Mezhdurechye Rural Settlement**

This stakeholder group is supposed to receive benefits form the Project such as increased taxes, improved infrastructure, new career opportunities.

Apart from affected stakeholders the following stakeholder groups who may have an interest in the Project were identified:

**Coal producers and consumers**

An important stakeholder group includes power-producing enterprises (coal mining companies that are going to supply coal to the terminal and coal consumers whose operations are considered as associated facilities)\(^\text{20}\).

**Neighbouring companies**

The land plots allocated for Lavna CTT construction are located next to the land of Polyarnye Zory Agricultural Enterprise. In 2011 they had a dispute with Lavna Commercial Sea Port LLC regarding the rights for a land plot.

**Vulnerable groups**

- Retired people of the Kola District;
- people with disabilities; and
- orphans.

**Authorities**

- Government of the RF;
- State controlling and supervisory bodies;
- Murmansk Region Administration;
- Kola District Administration
- Mezhdurechye Rural Settlement Administration.

\(^{19}\) Molochny Voted Against Construction of a Railroad to the Lavna Sea Port. 31 October 2012 // B-Port.Com [a regional Internet portal]. Available at [https://b-port.com/index/item/90825.html](https://b-port.com/index/item/90825.html).

**Non-governmental organizations (NGOs)**

1. Environmental NGOs
   - World Wildlife Fund (WWF) Barents Sea Office
   - Kola Biodiversity Conservation Centre Murmansk Regional NGO
   - Kola Environmental Centre Murmansk Regional NGO
   - Bellona-Murmansk Murmansk Regional Environmental NGO
   - Northern Environmental Coalition Non-profit Environmental Organisation

2. NGOs for indigenous peoples
   - Society for Promotion of Education in Law and Protection of Cultural Heritage of the Murmansk Region’s Saami;
   - Association of the Kola Saami (a Murmansk Region Civic Organisation);
   - Saami Social Fund for Nature Protection; and
   - Saami Heritage and Development Fund.

**Educational, scientific and research organizations**

Various educational institutions in Murmansk Oblast and Russia are interested in finding new employment opportunities for their graduates. Research organisations can take part in the research and development initiatives including the Project itself and other activity areas. The scientific organisations that may have interest in the project are listed below:

- Kola Science Centre of the Russian Academy of Sciences (RAS);
- Murmansk Marine Biological Institute of the Kola Science Centre of the RAS; and
- Kola Archaeological Expedition (KAE) of the Institute for the History of Material Culture of the RAS.

**Small and medium business**

This stakeholder group may expect favourable economic situation as a result of the Project implementation and possible support from the Project Proponent. The interests of small and medium enterprises (SMEs) are represented by the Union of Industrialists and Entrepreneurs of the Murmansk Region.

**Mass media**

Local and regional media regularly cover the Project Proponent’s business and social activities. The Company’s interaction with the media has already proved to be effective. For example, *the Lenta* newspaper serves as a platform for publishing information produced by the Company’s press service. As the Project preparation and implementation proceeds forward, the media can play an important role in managing reputational risks by disseminating crucial information about the Company among various stakeholders and also receiving and communicating their feedbacks. Other regional mass media that may have interest in the project are listed below:

- *The Murmansk Vestnik* daily regional newspaper;
- *The Kolskoye Slovo* weekly district newspaper;
- *The Arctic Star* newspaper;
- Murman State TV and Radio Company;
- TV-21 TV Company;
- Russkoye Radio – Murmansk Radio Station; and
- *The Barents Observer*.

Table 1: Key Stakeholders, Their Concerns and Expectations

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Role in the Project</th>
<th>Expectations</th>
<th>Concerns</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residents of Mezhdurechye and Mishukovo Villages</td>
<td>Stakeholders directly affected by the Project living within the Project’s area of environmental influence</td>
<td>May expect new development opportunities for the area due to the Project implementation</td>
<td>Are concerned about deterioration of the environment during construction and operations stages, loss of lands, population increase and lifestyle changes</td>
</tr>
<tr>
<td>Residents of the Kola District and in particular of the Mezhdurechye Rural Settlement</td>
<td>Stakeholders directly affected by the Project living within the Project’s area of economic influence</td>
<td>Expect economic growth due to budget revenues and economic growth</td>
<td>Are concerned about deterioration of the environment during construction and operations stages</td>
</tr>
<tr>
<td>Communities affected by the construction of the public railroad Vykhodnoy – Lavna (Molochny Settlement) and of the access railroad (Mezhdurechye Settlement)</td>
<td>The public road Vykhodnoy – Lavna and the access road to the Project site will be used for coal transportation which may have negative impact on the local environment. The issue was not considered in the national EIAs (OVOS) for respective projects.</td>
<td>Expectations are not identified.</td>
<td>Are concerned about possible deterioration of the environment in the residential area. NB: in 2012 residents of the Molochny Settlement voted against the public railroad construction at the public hearings on the MTU development project</td>
</tr>
<tr>
<td>Federal authorities</td>
<td>The Project is implemented under the Order of the RF President and will allow to solve some economic tasks of</td>
<td>The Project is supported at the highest level of authority</td>
<td>The Project is not implemented</td>
</tr>
</tbody>
</table>

NB: in 2012 residents of the Molochny Settlement voted against the public railroad construction at the public hearings on the MTU development project.
<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Role in the Project</th>
<th>Expectations</th>
<th>Concerns</th>
</tr>
</thead>
<tbody>
<tr>
<td>RF</td>
<td>..................................................................................................................</td>
<td>Expect budget revenues and economic growth of the Project region</td>
<td>The Project is not implemented.</td>
</tr>
<tr>
<td>Regional authorities of the Murmansk Region and district authorities of the Kola District</td>
<td>Will receive taxes from the built facility</td>
<td></td>
<td></td>
</tr>
<tr>
<td>State controlling and supervisory bodies</td>
<td>Have controlling and approving function</td>
<td>Expect strict compliance of the assignment with the national legislation</td>
<td>Possible incompatibility with national legislative requirements.</td>
</tr>
<tr>
<td>NGOs</td>
<td>Represent interests of local indigenous peoples, environmental activists, vulnerable groups and so on</td>
<td>May expect cooperation with the Company in terms of Project decisions</td>
<td>May be concerned about possible environmental and social adverse impacts</td>
</tr>
<tr>
<td>Educational and scientific organisations</td>
<td>May be interested in implementation of a range of scientific studies for the Project</td>
<td>May expect cooperation with the Company at the Project preparation, construction and operations</td>
<td>May be concerned about potential adverse environmental and social adverse impacts</td>
</tr>
<tr>
<td>Small and medium businesses</td>
<td>May start to develop within in the Project’s area of influence due to favourable economic situation</td>
<td>Expect cooperation with the Project Proponent</td>
<td>Concerns are not identified</td>
</tr>
<tr>
<td>Mass Media</td>
<td>Present the information on Company's operations. May influence the Project’s social image</td>
<td>Expect information transparency in terms of the Project scale, nature, duration, environmental and social impacts of the Project</td>
<td>Are concerned about possible lack of information on the Project</td>
</tr>
</tbody>
</table>
6. PROGRAMME OF STAKEHOLDER CONSULTATIONS & ENGAGEMENT

The proposed Stakeholder Consultations and Engagement Programme is presented in Table 2 and discussed below.

The Program below includes the following components:

- Information disclosure via mass media;
- Public consultations on the ESIA; and
- Ongoing stakeholder engagement and reporting to affected parties.

At all stages, the Project Proponent will:

- Provide timely and meaningful information on environmental and social aspects of the Project and company’s activities;
- Ensure two-ways communications/feedback.

6.1. Information Disclosure

According to BSTDB Environmental and Social Policy (2014), the ESIA disclosure package of this Project will include:

- Non-Technical Summary (NTS);
- Environmental and Social Action Plan (ESAP); and
- Stakeholder Engagement Plan (SEP).

For local disclosure, Russian versions of these documents will be prepared. All documents for international disclosure will be available in English.

The Project leaflet and the other project information will be provided as needed. The information dissemination will be the part of the stakeholder consultation process. For the Project the following channels of information disclosure are proposed:

- The official STLC website (https://gtlk.ru/);
- Mass media: The Kolskoye Slovo and the Murmanskiy Vestnik;
- Project’s Information Centre will be opened in Mezhdurechye Village, at the local Cultural Centre.

6.2. Public Consultations

For efficient consultations, a series of public meetings will be held. The agenda of these meetings will include presentation of the ESIA findings and collecting stakeholders’ feedback.

6.3. Ongoing Stakeholder Engagement Process and Reporting

A more extensive stakeholder engagement program is to be developed for continuing Project operations. This should include specific actions being identified within the process of public consultation. As a minimum the program should include:

- Annual reporting on environmental, health and safety (EHS) performance;
- Annual meetings with stakeholders to discuss environmental and social issues of the Project in particular. Such meetings may be organized for
various stakeholder groups, e.g. regional authorities, district authorities, the Project Proponent’s personnel and the trade union, and residents of affected communities.

More events may be added if specific concerns or interests are identified within the public consultation process.

### Table 2: Stakeholder Consultations and Engagement Programme

<table>
<thead>
<tr>
<th>Engagement Method / Activity</th>
<th>Document / Information</th>
<th>Location</th>
<th>Timeframes</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Establishing communication tools</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1. Publish information in the media</td>
<td>Project progress briefs</td>
<td>Local and regional mass media</td>
<td>As required but at least quarterly</td>
<td>Lavna Commercial Sea Port LLC</td>
</tr>
<tr>
<td>1.2. Launch and maintain the Public Information Center (PIC)</td>
<td>All information available</td>
<td>Mezhdurechye Cultural Center</td>
<td>January 2019</td>
<td>Lavna Commercial Sea Port LLC</td>
</tr>
<tr>
<td>1.3. Maintain the Project webpage at the Company’s website</td>
<td>- New Project information; - Annual public reports</td>
<td>TBD</td>
<td>Quarterly</td>
<td>Lavna Commercial Sea Port LLC</td>
</tr>
<tr>
<td>2. ESIA disclosure and consultations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.1. Disclosure of initial ESIA package</td>
<td>NTS; SEP; ESAP</td>
<td>- PIC (Mezhdurechye); - Project’s Website (TBC)</td>
<td>January, 2019</td>
<td>STLC; Lavna Commercial Sea Port LLC</td>
</tr>
<tr>
<td>2.2. Disclosure of ESIA Report</td>
<td>ESIA Report (or Addendum to ESIA)</td>
<td>- PIC (Mezhdurechye); - Project’s Website (TBC)</td>
<td>Q1 2019</td>
<td>STLC; Lavna Commercial Sea Port LLC</td>
</tr>
<tr>
<td>2.3. Initial meeting with the local communities, authorities, business groups, and NGOs</td>
<td>ESIA Report; NTS; SEP; ESAP</td>
<td>Mezhdurechye Cultural Centre</td>
<td>Q1 2019</td>
<td>Lavna Commercial Sea Port LLC, Mezhdurechye Rural Settlement Administration, Kola District Administration</td>
</tr>
<tr>
<td>2.4. Collection comments from stakeholders</td>
<td>Project’s Information Centre Project’s webpage at the Company’s website</td>
<td>- PIC (Mezhdurechye); - Project’s Website (TBC)</td>
<td>Q1 – Q2 2019</td>
<td>Lavna Commercial Sea Port LLC, Mezhdurechye</td>
</tr>
<tr>
<td>2.5. Feedback meeting to address concerns and comments from</td>
<td>NTS, SEP, ESAP, and leaflets</td>
<td>Mezhdurechye Cultural Centre</td>
<td>Q2 2019</td>
<td>Lavna Commercial Sea Port LLC, Mezhdurechye Rural Settlement</td>
</tr>
</tbody>
</table>

21 All documents should be available in Russian language.
### 3. Ongoing stakeholder engagement

3.1. Publish the annual Environmental and Social Report on the Company’s operations

- "Lavna Commercial Port" Environmental and Social Report
- Project’s Website (TBC)
- Annually
- Lavna Commercial Sea Port LLC

3.2. Carry out stakeholders’ meetings discussing the environmental and social aspects of the Project

- Environmental and Social report, leaflets
- Project’s Website (TBC)
- Annually
- Lavna Commercial Sea Port LLC, Mezhdurechye Rural Settlement Administration, Kola District Administration

### 7. GRIEVANCE MECHANISM

Investment projects may give rise to controversies and potential conflicts between the Project Proponent and various interested/affected parties. An effective grievance mechanism needs to be established and maintained to anticipate, prevent and/or settle any conflicts in a constructive manner, and effectively handle complaints/petitions from various stakeholders.

In order to be able to anticipate and address potential conflicts in a timely manner and in line with the requirements of international lending agencies, the following actions are recommended:

1. The Company should establish a formal grievance mechanism to handle complaints from stakeholders, both internal and external; with details thereof to be publicised. The Project Proponent should have in place publicly available and easily accessible channels (e.g., phone number, website, e-mail address, etc.) to receive external communications and requests for information regarding their environmental and social performance.

2. The following information should be communicated to the Project stakeholders:
   - Contact details of a Company’s officer responsible for collecting and filing petitions and/or complaints (name, telephone, mailing address, and e-mail);
   - Confirmation that complainants will not be victimized in any way if they complain;
   - Methods of submitting a complaint and/or petition (e.g. ordinary mail, telephone call, and possibly, special complaint boxes); and
   - Timeframe for handling a complaint and/or petition and feedback mechanisms.

It is important to ensure that the complaint format is simple and flexible, and each complainant is able to complain anonymously to the Company whilst still receiving a meaningful response.
All incoming complaints should be properly filed and processed. The response to each complaint is to be prepared by a specially appointed officer and approved by management. Each complaint should be responded to not later than within 20 days from date of its submission.

Information about environmental and social aspects of the Project can be obtained, and questions and comments are accepted:

- By Internet:
- By phone:
- By e-mail:

Contact person:

8. MONITORING AND REPORTING
The success of the SEP implementation depends on systematic and ongoing monitoring and analysis of the results. Initial stakeholder engagement performance indicators can be the following:

- Number of public consultation participants registered in the Stakeholder Register;
- Number of recommendations given by stakeholders via different feedback mechanisms;
- Number of complaints and claims to the project implementation process from stakeholders; and
- Number of publications on the Project implementation process in local, regional and national newspapers.
ANNOUNCEMENTS ON THE PUBLIC HEARINGS

nenfelli

13 December 2018

SELF-EMPLOYED

PAPALIA ON CRAWBIES

In the village Tepelkrai in the province Malyi Olen, a public hearing was held to discuss the results of the annual inspection of the crawbiers' group. The annual inspection is conducted by the local authorities to ensure compliance with the regulations governing the cultivation and harvesting of crawberries. The crawbiers of the group have been conducting their activities in a sustainable and environmentally friendly manner, with a focus on preserving the natural habitat and ensuring the long-term sustainability of the crawberries.

The crawbiers reported that the current season has been good, with a healthy yield of crawberries. They also highlighted the importance of maintaining the natural habitat and preserving the environment for future generations. The public hearing was an opportunity for the crawbiers to share their experiences and concerns, as well as receive feedback and suggestions from the authorities.

The authorities expressed their appreciation for the efforts of the crawbiers and emphasized the importance of continued cooperation and communication. They also reminded the crawbiers of their obligations under the regulations and urged them to continue their sustainable practices.
Кредитование
Банк Росси в предложен привлекательной стоимость кредитов к надежной ключевой ставке

Проценты поплыли вниз

В спрещении Банк России предложил привлекательную стоимость кредитов к надежной ключевой ставке, которая, по сути, стала ниже ставки по ЦБ в марте 2015 года.

Важно отметить, что понижение процентных ставок сдерживает инфляцию и уменьшает процентную нагрузку на заемщиков. Однако, это может привести к снижению спроса на кредиты и замедлению экономического роста.

Выводы:
- Понижение процентных ставок - это важный шаг для стимулирования экономики и улучшения условий жизни граждан.
- Однако, необходимо учитывать потенциальное влияние на инфляцию и стабильность рынка.

Таким образом, понижение процентных ставок является важным инструментом для поддержания экономического роста и улучшения условий жизни граждан.
Annex 2. MINUTES OF THE PUBLIC HEARINGS ON THE EIA MATERIALS

Утверждено
Глава администрации Кольского района
А.П. Лихолат
«___» март 2018 г.

ПРОТОКОЛ
общественных слушаний
по материалам оценки воздействия на окружающую природную среду по проектной документации «Комплекс перегрузки угля «Лавна» в морском порту Мурманск»

г. Кола, Кольский район, Мурманская область 20 марта 2018 г.

Дата и время проведения: 20 марта 2018 г. 14-30
Место проведения: МУК «Межпоселенческая библиотека Кольского района», по адресу:
Мурманская область, Кольский район, г. Кола, пер. Островского, д.6.
Организатор общественных слушаний: ООО «Морской торговый порт «Лавна»
Состав Комиссии:
Председатель:
Гуданов Виталий Геннадьевич – Заместитель генерального директора по службе
Заказчика-застройщика ООО «МТП «Лавна».
Секретарь:
Кислов Владислав Николаевич – Комплексный ГИП АО «Ямалтрансстрой».

Члены Комиссии:
Махасин Андрей Сергеевич – Депутат Совета депутатов Кольского района Мурманской области пятое созыва по избирательному округу №3;
Сергиев Сергей Федорович – Заместитель Главы администрации Кольского района;
Рудаков Александр Николаевич – Управляющий делами администрации Кольского района;
Захарова Ольга Андреевна – Заместитель начальника отдела архитектуры, строительства и дорожной деятельности администрации Кольского района;
Борисова Светлана Андреевна – Ведущий эксперт отдела архитектуры, строительства и дорожной деятельности администрации Кольского района;
Яблочкова Елена Валерьевна – Заместитель генерального директора по правовым вопросам ООО «МТП «Лавна»;
Кривошапов Сергей Юрьевич – Исполнительный директор ООО «МТП «Лавна»;
Нек Владимиров Игоревич – Директор Управления перспективных проектов АО «Ямалтрансстрой».

Состав представленных для ознакомления материалов:
11-10/1-17-ПЗ.1.1 Декларация (холатство) о планируемой деятельности;
Техническое задание на проведение Оценки воздействия на окружающую среду по проекту
«Комплекс перегрузки угля «Лавна» в морском порту Мурманск»;
11-10/1-17-ООС8.2 Оценка воздействия на окружающую среду объекта «Комплекс переработки углей «Ларва» в морском порту Мурманск».

Заказчик и разработчик материалов: ООО «Морской торговый порт «Ларва», АО «Ямалтрансстрой», АО «ПЕНИМОРИИПРОЕКТ».

В обсуждении приняли участие 23 человека: жители г. Кола, поселка Молочной, г. Мурманск, с. Тулома, поселка Мурмаш Мурманской области. Граждане зарегистрированы в «Журнале регистрации участников общественных слушаний по предварительному варианту материалов оценки воздействия на окружающую природную среду в результате деятельности, связанной с реализацией проекта строительства «Комплекс переработки углей «Ларва» в морском порту Мурманск», список участников прилагается на 22 листах.

Повестка дня общественных (публичных) слушаний

1. Обсуждение технических решений по строительству «Комплекс переработки углей «Ларва» в морском порту Мурманск».
   Докладчик: Кирилл Алексеев Сергеевич – главный инженер проекта АО «ПЕНИМОРИИПРОЕКТ».

2. Обсуждение оценки воздействия на окружающую среду и природоохранных мероприятий при строительстве и эксплуатации «Комплекс переработки углей «Ларва» в морском порту Мурманск».
   Докладчик: Ариничева Светлана Владимировна – инженер 1 категории АО «ПЕНИМОРИИПРОЕКТ».
   Информация о проведении общественных обсуждений доведена до сведения общественности через средства массовой информации:
   На муниципальном уровне – через газету «Кольское слово» от 15.02.2018г.
   На официальном сайте органов местного самоуправления муниципального образования Кольский район Мурманской области.

Материалы для слушаний были доступны для ознакомления:
- на официальном сайте органов местного самоуправления муниципального образования Кольский район Мурманской области;
- в Администрации Кольского района Мурманской области по адресу: Мурманская область, Кольский район, г. Кола, пр. Советский, д. 50.
- в МУК «Межпоселенческая библиотека Кольского района» по адресу: Мурманская область, Кольский район, г. Кола, пер. Островского, д. 6.

Предложения и замечания общественности внесены в «Журнал учета замечаний и предложений общественности в рамках проведения оценки воздействия на окружающую среду по объекту: «Комплекс переработки углей «Ларва» в морском порту Мурманск», прилагаются на 24 листах.
Слушали:
1. Гудановича Виталия Геннадьевича, выступившего со вступительным словом о регламенте проведения общественных обсуждений;
2. Кирилла Алексея Сергеевича, доложившего о технических решениях возведения проектируемого объекта «Комплекс перегрузки угля «Лавная» в морском порту Мурманск».
3. Арипчину Светлану Владимировну, выступившую с результатами оценки воздействия при строительстве и эксплуатации рассматриваемого объекта на компоненты окружающей среды.

Заданные вопросы и полученные ответы:

1. Как в проекте учтен нерест рыб в Кольском заливе?
   Ответ: В соответствии с представленной информацией по нересту от ФГБНУ «ПИНРО» в проекте организации строительства предусмотрен запрет на строительные работы в акватории Кольского залива в период нереста.

2. В районе проектируемого терминала имеется кладбище, как будет обеспечена доступ людей на данное кладбище?
   Ответ: В проекте предусмотрено устройство автоводорожки с парковкой. Доступ на кладбище будет осуществляться как в период строительства терминала, так и эксплуатации.

3. Будет ли разрабатываться Санитарно-защитная зона?
   Ответ: В составе проектной документации разрабатывается СЗЗ, которая будет согласована в установленном порядке.

4. Сколько было зарегистрировано замечаний в журнале учета замечаний и предложений по предварительному варианту материалов по ОВОС Проекта?
   Ответ: В журнале учета замечаний и предложений по предварительному варианту материалов по ОВОС Проекта зарегистрировано 10 записей (Приложение 1).

5. Какие сроки получения положительного заключения ФАУ «Главосэкспертиза России».
   Ответ: в соответствии с действующим договором получение заключения ФАУ «Главосэкспертиза России» запланировано на октябрь 2018 года.

6. Что происходит с угольной пылью собранной системой аспирации на комплексе?
   Ответ: В соответствии с принятыми технологическими решениями собранная угольная пыль будет отправляться на конвейер.

7. Достаточны ли глубины у проектируемого причала, будет ли дноуглубление?
   Ответ: Расчетная отметка операционной акватории терминала составляет минус 22,6 м Б.С..-77. В объёмы данного проекта не входит производство дноуглубительных работ, проект рассматривает объёмы работ финансируемые частным Инвестором. В настоящий момент объявлен конкурс на выполнение проектных и изыскательских работ по объекту «Комплексное развитие Мурманского транспортного узла. II этап - дноуглубление акватории и водных подходов для угольного терминала. III этап - дноуглубление акватории и водных подходов для нефтеналивного терминала». Заказчик Федеральное казенное учреждение "Лиценция Государственного заказчика по реализации Федеральной целевой программы "Модернизация транспортной системы России", дноуглубительные работы по водным подходам и формированию операционной акватории входят в объём данного проекта.
Выступили:
Секретарь комиссии Кислов Владислав Николаевич объявил об окончании обсуждений, подвел их итог, и предложил одобрить представленную Оценку воздействия на окружающую среду проектной документации «Комплекс перегрузки угля «Лавна» в морском порту Мурманск» и прилагаемые к ней материалы. Сообщил, что протокол общественных обсуждений будет направлен в администрацию Кольского района Мурманской области и представлен в органы Государственной экологической экспертизы.

Постановили:
1. Одобрить представленную Оценку воздействия на окружающую среду проектной документации «Комплекс перегрузки угля «Лавна» в морском порту Мурманск» и прилагаемые к ней материалы.
2. Разместить протокол общественных обсуждений на официальном сайте органов местного самоуправления муниципального образования Кольский район Мурманской области.

Приложения:
1. «Журнал учета замечаний и предложений общественности в рамках проведения оценки воздействия на окружающую среду по объекту: «Комплекс перегрузки угля «Лавна» в морском порту Мурманск» – 1 экз., на 24 л.
2. «Журнал регистрации участников общественных слушаний по предварительному варианту материалов оценки воздействия на окружающую природную среду в результате деятельности, связанной с реализацией проекта строительства «Комплекс перегрузки угля «Лавна» в морском порту Мурманск» – 1 экз., на 23 л.

Подписи:
Председатель
Гуданович В.Г.
Кислов В.Н.
Секретарь
Малхасян А.С.
Сергун С.Ф.
Рудаков А.Н.
Захарова О.А.
Борисова С.А.
Яблочникова Е.В.
Криволапов С.Ю.
Члены комиссии
Нак В.И.

Представитель общественности
Петров В.В.