
Revised

**Sustainable Mercury Management in
Non-ferrous Metal Industry
Stakeholder Engagement Plan**

FECO

April, 2024

Content

1.	Introduction.....	1
1.1.	Background	1
1.2.	Project Content.....	1
2.	Introduction to the Stakeholder Engagement Plan.....	6
2.1.	Purpose, Scope of Application and Main Content	6
2.2.	Working Methods	6
3.	Project Activities and Potential Environmental and Social Impacts and Risks	8
4.	Legal and Regulatory Framework	13
4.1.	Domestic Legal and Regulatory Framework.....	13
4.2.	World Bank ESF Environmental and Social Standard 10	15
5.	Stakeholder Engagement Plan.....	17
5.1.	Identification and Analysis of Stakeholders.....	17
5.2.	Stakeholder Engagement Plan.....	30
5.2.1.	Information Disclosure	30
5.2.2.	Public Participation	37
5.2.3.	Implemented Stakeholder Engagement	45
6.	Grievance Mechanism.....	51
6.1.	Community Grievance Mechanism.....	51
6.2.	Labor Grievance Mechanism.....	54
6.3.	Grievance Recording and Reporting System	55
7.	Organizations.....	58
8.	Monitoring and Reporting	62

1. Introduction

1.1. Background

The *Minamata Convention on Mercury* (hereinafter referred to as the "*Mercury Convention*") entered into force on August 16, 2017. The smelting of non-ferrous metals such as lead, zinc and copper is a key source of atmospheric mercury emissions that is prioritized and controlled by the *Mercury Convention*. In accordance with the requirements of Article 8 of the *Mercury Convention*, measures such as Best Available Technology (BAT) and Best Environmental Practice (BEP), emission limits, and coordinated control of multiple pollutants are required to take to control atmospheric mercury emissions.

In order to promote the non-ferrous metal smelting industry to fulfill the obligations of the *Mercury Convention*, the Foreign Environmental Cooperation Office of the Ministry of Ecology and Environment and the World Bank jointly developed the "*Sustainable Mercury Management and Green Production Project in China's Non-Ferrous Metal Smelting Industry*" (hereinafter referred to as the "*Project*").

1.2. Project Content

The content of the project is divided into two types of activities: physical engineering and technical assistance.

- i. **Physical Engineering Class.** It is mainly for the demonstration and promotion of mercury-emission-reduction-related production line upgrade and equipment transformation.
- ii. **Technical Assistance Class.** It is mainly about revision research of policies and standards, publicity and promotion activities and project management.

The project implementation period is six years, and the specific activities are shown in Table 1-1.

Table 1-1 Project Activity

Name	No.	Content	Type of Activity
Activity 1: Carry out research on the formulation and revision of relevant policies, laws, regulations and standards and promotion of demonstration results	1.1	Carry out research on policies and standards related to whole-process management in the non-ferrous smelting industry	Technical assistance
	1.1.1	Research and formulate policies and standards for mercury-containing raw materials and by-products in lead-zinc-copper non-ferrous smelting industry, including: <ul style="list-style-type: none"> • According to the typical production process and pollution control facility technology route, carry out the study of mercury flow direction in lead, zinc and copper smelting industry, obtain reliable mercury input and output data in different materials, and update the list of mercury emission and release in non-ferrous metal industry; • Aiming at mercury-containing ores, study and propose the limit of mercury content in ores and revised the <i>Specification for the Limit of harmful Elements in Heavy metal Concentrate Products</i> (GB 20424-2006); • Focus on the copper smelting industry to carry out research on the production and application of by-products (sulfuric acid), and put forward policy suggestions on the optimization of sulfuric acid product application structure; • Conduct research on the impact of increased production of recycled lead and zinc products on the production of primary lead and zinc products in accordance with other industry plans and the implementation plan of "carbon peaking and carbon neutrality" and other policy documents. 	
	1.1.2	Evaluated the <i>Guidelines for the Best Available Techniques for the Prevention and Control of Pollution from Lead Smelting (Trial)</i> (HJ-BAT-7) (2012), and compiled a guideline for feasible techniques for the prevention and control of air pollution in the lead and zinc industries	
	1.1.3	Studying and compiling feasible technical guidelines for the prevention and control of air pollution in the copper smelting industry	

Sustainable Mercury Management in Non-ferrous Metal Industry Stakeholder Engagement Plan

Name	No.	Content	Type of Activity
	1.1.4	Research and propose guidelines for the environmental management of mercury-containing general industrial solid wastes and suggestions for improving the environmental management guidelines for mercury-containing hazardous wastes	
	1.1.5	Establish a mercury-containing waste management system for non-ferrous metal smelting industry and put forward harmless management measures for mercury-containing waste, including: <ul style="list-style-type: none"> • Research on mercury-containing waste management system in non-ferrous smelting industry (e.g., best management practices, harmless management improvement strategies, etc.); The retrospective analysis of site risks around the demonstration enterprises will provide reference for the future development of soil remediation and management plans to reduce the release and migration of mercury into the environment 	
	1.2	Carry out demonstration effect evaluation (for the effect of each demonstration enterprise before and after technological transformation, combined with pollution reduction and carbon reduction, energy saving, and clean production, design index items)	
	1.3	Formulate a non-ferrous metal smelting demonstration technology promotion plan and carry out publicity and promotion activities	
	1.4	Carry out environmental and social security assessment and supervision	
	1.4.1	Enterprise Environmental and Social Assessment	
	1.4.2	Third party monitoring and assessment activities (invite a third party to supervise and assess the implementation of environmental and social security guarantees in the process of technology demonstration and demonstration technology promotion)	
	1.5	Coordination and communication support of local management departments (invite the environmental management departments of the provinces where the project demonstration enterprises are located to assist in relevant communication, coordination and organization. Assist to promote the development and	

Sustainable Mercury Management in Non-ferrous Metal Industry Stakeholder Engagement Plan

Name	No.	Content	Type of Activity
		implementation of the overall project activities in the jurisdiction, including relevant policies, regulations, standards, technical guidelines research and preparation, daily supervision of demonstration enterprises and public awareness raising, etc.)	
	1.6	Establish technical consultation team for project activities	
Activity 2: Demonstration of atmospheric mercury emission control and mercury-containing waste concentration technology	2.1	Carry out special mercury removal technology demonstrations in lead and zinc smelting demonstration enterprises to accumulate experience for further improving the effect of flue gas mercury emission control	Physical engineering
	2.2	Carry out improving and upgrading of conventional pollutant control and mercury cooperative control in flue gas of lead and zinc smelting enterprises (upgrade smelting furnaces, dust removal facilities, desulfurization facilities, denigration facilities and other equipment of lead and zinc smelting demonstration enterprises, and improve the control level of conventional pollutants and the effect of mercury cooperative control in flue gas of demonstration enterprises)	
	2.3	Carry out the demonstration of mercury-containing waste concentration technology in lead-zinc smelting industry (carry out the demonstration of mercury-containing waste concentration and recovery technology in demonstration enterprises to promote the reduction of the proportion of primary mercury production and use, and at the same time reduce the release of mercury into the environment during the management and disposal of mercury-containing waste)	
	2.4	Carry out capacity building of mercury monitoring in flue gas of enterprises (Install online mercury monitoring equipment in lead and zinc smelting demonstration enterprises, improve their capacity to monitor mercury emissions, and support demonstration enterprises in implementing and meeting the requirements of the emission permit system and the environmental tax law)	
Activity 3: Carry out project implementation	3.1	Hold a project kick-off meeting and summary meeting	Technical assistance
	3.2	Employ project assistant to assist in the communication, coordination and organization of the project implementation process	
	3.3	Project implementation management expenses (administrative expenses, staff salaries, etc.)	

Sustainable Mercury Management in Non-ferrous Metal Industry Stakeholder Engagement Plan

Name	No.	Content	Type of Activity
supervision and management	3.4	Carry out performance evaluation of the project implementation	

2. Introduction to the Stakeholder Engagement Plan

2.1. Purpose, Scope of Application and Main Content

The Stakeholder Engagement Plan (SEP) is a part of the environmental and social management documents of the Global Environment Facility "*Sustainable Mercury Management and Green Production Project in China's Non-Ferrous Metal Smelting Industry*". The purpose is to establish a set of stakeholder engagement mechanism and develop management plans and methods for the mechanism.

The stakeholder engagement plan applies to all sub-project activities involved in this project, and associated project activities. The stakeholder engagement plan runs through the entire project cycle, including the stakeholder engagement in the project preparation stage and the project operation stage. In addition, the stakeholder engagement plan includes a set of grievance mechanism to receive and resolve project-related concerns and grievances.

The stakeholder engagement plan (SEP) will be incorporated into the *Environmental and Social Commitment Plan* (ESCP) of the project and should be implemented in accordance with the corresponding management mechanism and schedule.

2.2. Working Methods

Desk research. The desk research is mainly based on the information provided by FECO and related project companies, domestic laws and regulations, the World Bank's *Environmental and Social Standards*, and network information, to conduct analysis and research, identify project objectives, content, potential impacts, applicable regulatory requirements, as well as the current overall status of the industry, etc.

Industry representatives' visit and discussion with enterprises. Visit the representative enterprises and potential project-related facilities of the lead, zinc and copper smelting industry, and hold discussions with the management personnel of the relevant companies to understand the company's overall production and operation business, main stakeholders of the company, and the relevant environmental and social systems and management of the company.

Employee interview and community discussion. Hold discussions with the front-line employees, and consulted with surrounding community management personnel, community resident representatives and major public facility management personnel to understand how employees feel about the project environment, their cognition of

social impacts and opinions on the project construction and operation, surrounding communities' understanding of the overall image of the project company, perception of the project, perception of the company's environmental and social management, and their opinions on the project construction and operation.

3. Project Activities and Potential Environmental and Social Impacts and Risks

The project intends to carry out two activities, the nature of which includes i) technical assistance, including research and project evaluation, management and technical exchange, ii) physical engineering, including equipment procurement and upgrading, supporting facilities construction or capacity expansion, etc. Among them, the equipment procurement and upgrading of Activity 2 may prompt some enterprises to construct supporting facilities or expand production capacity, thus resulting in related activities. Combined with World Bank *Environmental and Social Standards*, after these activities are constructed and put into operation, there may be various potential environmental and social impacts and risks, as shown in Table 3-1. Based on these potential environmental and social impacts and risks, the stakeholder engagement plan identifies and analyzes stakeholders and formulates corresponding engagement plans.

Table 3-1 Project Activities and Potential Environmental and Social Impact and Risk Analysis

Project Activities	Nature of Activity	Potential Environmental Impacts and Risks	Potential Social Impacts and Risks
<p>Activity 1: Carry out research on the formulation and revision of relevant policies, laws and regulations, and promote the demonstration results. Including (1) conducting research and formulation of policies and standards related to environmental management in the whole process of lead-zinc-copper non-ferrous smelting industry; (2) Evaluation of the effect of demonstration activities; (3) Formulate popularization plans for demonstration technologies in the non-ferrous metal smelting industry and carry out publicity and promotion activities; (4) Carry out environmental and social security assessment and supervision; (5) Coordination and communication support of local administrative departments; (6) Establish a technical consulting team for project activities.</p>	<p>• Technical assistance: research, project evaluation.</p>	<p>The implementation of the standards or guidelines may produce indirect and potential environmental risks and impacts on downstream enterprises, which may lead to the transformation of production lines and environmental protection facilities by relevant industrial enterprises, and may involve small construction projects, resulting in relevant environmental impacts.</p>	<p>Participation of technical assistance experts in research, assessment and supervision of management and health and safety risks in the work process, such as COVID-19 issues; Inadequate stakeholder engagement; Downstream extension impacts, such as the promotion and implementation of various research findings, may lead to social risks for downstream related enterprises, such as labor management and working conditions risks, community health and safety risks, land use and resettlement risks.</p>
<p>Activity 2: Demonstration of atmospheric mercury</p>	<p>• Physical engineering:</p>	<p>Discharge of waste-</p>	<p>Worker safety and working</p>

<p>emission control and mercury-containing waste concentration technology, including (1) the demonstration of mercury removal technology in flue gas of lead-zinc smelting industry; (2) Upgrading the control of conventional pollutants and co-control of mercury in flue gas of lead-zinc smelting enterprises; (3) Carry out the demonstration of mercury-containing waste concentration technology in lead-zinc smelting industry; (4) To build the capacity of mercury monitoring in flue gas of enterprises, improve the recovery rate of mercury containing waste, promote the reduction of the proportion of primary mercury production and use, realize the reduction of hazardous waste containing mercury, and reduce the environmental risk of hazardous waste.</p>	<p>equipment upgrade and procurement, supporting facilities construction or capacity expansion.</p>	<p>water, waste gas, solid waste and noise during the construction period and operation period; Leakage of hazardous chemicals/toxic and harmful substances causes environmental pollution; Energy consumption and carbon emissions.</p>	<p>environment: during project construction, worker equipment procurement and transportation safety; Health and safety of construction personnel during equipment installation and commissioning; After the project is put into operation, some workers' work scope and skills will be updated and workers need to master new technologies. Compared with the original process, the new equipment may produce some new health and safety hazard factors; The risk of exposure to dangerous environment during the field investigation of non-ferrous metal smelting waste acid residue personnel.</p> <p>Community health and safety: environmental pollution, road traffic safety, transmission of communicable diseases, influx of workers, etc.</p> <p>Land use and land acquisition</p>
--	---	--	--

		<p>migration: upgrading facilities and equipment or capacity expansion will be involved within existing factory without involving new land acquisition, which will affect the production and living of the households.</p> <p>Rights and interests of vulnerable people: When the project is located in an ethnic minority area, the environmental or land impact of the project will affect ethnic minority personnel.</p> <p>Stakeholder engagement and information disclosure: Among the impacts of the project on workers and their working environment, the impacts on poor employees, disabled employees, minority employees and female employees need to be evaluated. If the participation and information disclosure of stakeholders are insufficient, the construction and operation of the project will be</p>
--	--	--

			affected.
<p>Activity 3: Carry out supervision and management of project implementation, including holding the project kickoff meeting and summary meeting, employing project assistant, assisting in the communication, coordination and organization of the project implementation process, project implementation management, carrying out project implementation performance evaluation, etc., managing and supervising the implementation of project activities, and promoting the completion of project activities on schedule and with quality.</p>	<ul style="list-style-type: none"> • Technical assistance: project supervision, management and communication. 	<p>No obvious environmental impact.</p>	<p>Involvement of project supervisors, health and safety risks, such as COVID-19 issues, or possible exposure to toxic and hazardous substances and other production emissions when entering work and construction sites during project monitoring.</p>

4. Legal and Regulatory Framework

China's legal and regulatory system and the World Bank's environmental and social standards stipulate management requirements for project design, construction, operation management and monitoring with stakeholder participation. Enterprises and related units participating in this project are required to abide by these laws and regulations of the company and the requirements of the World Bank's environmental and social standards. This chapter summarizes the domestic laws and regulations applicable to this project, as well as the World Bank's environmental and social standards.

4.1. Domestic Legal and Regulatory Framework

During the project preparation and construction period, the relevant laws and regulations concerning stakeholder participation to be referred to are as follows:

- *The Constitution of the People's Republic of China* (amended in 2018);
- *Measures for Public Participation in EIA*, Order No. 4 of the Ministry of Ecology and Environment of the People's Republic of China (effective on January 1, 2019);
- *Environmental Impact Assessment Law* (as amended in 2018);
- *The Land Administration Law of the People's Republic of China* (as amended on August 26, 2019);
- *Regulations on Letters and Visits* (2005.5.1)
- *The Organization Law of Village Committees* (effective in 2010);
- *Measures for the Announcement of Land Acquisition* (amended in 2010);
- *Notice on Interim Measures for Social Stability Risk Assessment of Key Projects* (effective in 2012).

Information Disclosure and Public Participation in the EIA Process of the Project:

The *Environmental Impact Assessment Law* (as amended in 2018) requires ongoing consultation with stakeholders throughout the EIA process. In addition, the Ministry of Ecology and Environment's *Measures for Public Participation in Environmental Impact Assessment* issued in 2019 clarifies the requirements for public participation in special planning environmental impact assessment and environmental impact assessment application projects. In practice, EIA reporting projects generally adopt the following

requirements:

- Disclose the name of the project sponsor, the name of the EIA contractor and the period for conducting the EIA;
- Disclosure of relevant project information;
- Consultation through written questionnaires, household surveys, town hall meetings or other means; and
- Disclose non-technical summaries of EIA reports and findings.
- The project implementing agency and the EIA assessment agency should carefully consider the results of stakeholder consultation and record the adoption or other reasons in the EIA report.

Information Disclosure and Public Participation in Project Social Stability Risk Assessment: *Interim Measures for Social Stability Risk Assessment of Major Fixed Asset Investment Projects* (NDRC Investment [2012] 2492 No.) requires social stability risk assessment for major fixed asset investment projects. Specifically, it requires projects to take steps to avoid or minimize social impacts and risks. Project implementing units should:

- Carry out research on social stability risks;
- Conduct public consultation;
- Identify social risks and conduct impact assessments;
- Propose mitigation measures to manage the identified risks;
- Assess the level of project social stability risk after mitigation measures are implemented; and
- Submit a social stability risk analysis (either as a chapter of a feasibility study or as a separate topic-specific report).

It should be noted that the applicability of social stability risk assessment depends on the nature and scale of sub-projects, especially whether land acquisition is involved, and is not applicable to all sub-projects.

Subprojects Involving Land Acquisition: Projects involving land acquisition and

demolition should follow the requirements of the *Land Administration Law* (as amended on August 26, 2019). After the approval according to legal procedures, the local people's government at or above the county level should announce the project land acquisition information, and the expropriation scope, land status, purpose of expropriation, compensation standards, resettlement methods and social security should be announced in the township where the land to be acquired is located, villages and villagers' groups should make public announcements for at least 30 days, and listen to the opinions of the rural collective economic organizations whose land is expropriated and their members, village committees and other stakeholders.

Grievance Mechanism: Grievance mechanisms include community grievance mechanisms and labor dispute resolution mechanisms.

- **Community Grievance Mechanism.** According to the *Regulations on Letters and Visits of the People's Republic of China* (2005), the letter-and-visit departments of the governments at or above the county level perform the duties of accepting, assigning, undertaking, coordinating, handling, and supervising the handling, including handling complaints through the county government's letter and visit office or the county magistrate's hotline/email. , the process includes the mechanism of collection, start within 7 days, processing and feedback within 2 months. In addition, residents can resolve disputes through civil proceedings in the courts.
- **Labor dispute resolution mechanism.** According to the relevant provisions on labor arbitration in the *Civil Code of the People's Republic of China* (2021.1), in the event of labor and personnel disputes, relevant employees can seek help from the labor security supervision and law enforcement agencies of the labor department, or they can directly submit labor dispute arbitration; Article 1010 of the Civil Code of PRC stipulates that a person who has been sexually harassed again will by another person through oral words, written language, images, physical acts, or the like, has the right request the actor to bear civil liability in accordance with law. Article 40 of the Law of the People's Republic of China on the Protection of Women's Rights and Interests stipulates that sexual harassment against women is prohibited and victims have the right to file complaints with relevant units. Article 11 of the Special Rules on the Labor Protection of Female Employees stipulates that employers in the workplace must prevent and stop sexual harassment against female workers.

4.2. World Bank ESF Environmental and Social Standard 10

The World Bank publishes an independent standard under the *ESF* for managing

stakeholder engagement and disclosure in projects. The World Bank ESS10 and corresponding guidance notes contain clear requirements for stakeholder engagement. As such, it is a key guide for project stakeholder engagement throughout the project cycle. ESS10 specifies the following elements of stakeholder engagement:

- Engage with stakeholders throughout the project life cycle, starting this engagement early in the project process;
- Develop and implement a stakeholder engagement plan that describes when and how to engage with stakeholders throughout the project life cycle;
- Disclosure of project information so that stakeholders understand the risks and impacts of the project, as well as potential opportunities;
- Conduct meaningful consultations with all stakeholders. Provide timely, relevant, understandable and accessible information to stakeholders and consult with them in a culturally appropriate manner free from manipulation, interference, coercion, discrimination and intimidation;
- Maintain written records of stakeholder engagement, including a description of the stakeholders consulted, a summary of feedback received, and a brief explanation of how feedback was considered or why it was not considered;
- Develop and implement grievance mechanisms to receive and facilitate resolution of concerns and grievances from project-affected parties.

5. Stakeholder Engagement Plan

Combined with the domestic and World Bank legal and regulatory requirements for stakeholder participation in Chapter 4, this chapter designs a stakeholder participation plan for companies and project activities involved in this project.

Basic Principles of Stakeholder Engagement

- Stakeholder participation runs through the entire project cycle, and the earlier the project is started, the better;
- Stakeholder participation will be conducted in a free and free manner, and any stakeholder participation will not be subject to any coercion;
- The project will try to set up channels and methods that are convenient for the participation of the most stakeholders, and encourage stakeholders to participate in the project;
- Stakeholder engagement will be designed, documented and monitored.

Basic Steps for Stakeholder Engagement

- Identify project activities and potential environmental and social impacts of each activity;
- Identify the stakeholders corresponding to the project impacts, including those affected by the project's environment and society, as well as units that have influence on the project implementation, as well as individuals and NGOs interested in the project;
- Prepare a stakeholder engagement plan based on the above two steps;
- Project grievance mechanism;
- Project stakeholder engagement plan and organizational setup of the grievance mechanism.

The following will analyze and formulate the stakeholder engagement framework for this project based on these basic principles and steps.

5.1. Identification and Analysis of Stakeholders

Based on the introduction of the project activities in Chapter 1, especially the conclusions of the analysis of potential environmental and social impacts of each

activity in Chapter 3, this section identifies the potential stakeholders that may be affected or involved by each project activity, and combines legal and regulatory requirements, on-site investigations Interviews with stakeholder representatives to analyze potential interests and concerns of stakeholders, so as to provide legal and realistic basis for formulating targeted stakeholder engagement plans.

The main criteria for identifying stakeholders include i) the subjects affected by the project's environment and society, ii) the units that have influence on the project implementation, and the individuals and non-governmental organizations interested in the project.

Table 5-1 shows the result of stakeholder identification and analysis combined with project background data analysis and on-site investigation. Each project enterprise should adjust and improve it according to its actual situation.

Table 5-1 Stakeholder Identification and Analysis

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
1. Technical assistance	FECO	The project is completed safely according to the corresponding technical requirements and time requirements	<ul style="list-style-type: none"> Establish a good communication mechanism with technical assistance agencies and experts to keep abreast of project information and needed support
	Technical assistance agencies and experts	Access to project information and a fair chance to participate	<ul style="list-style-type: none"> Have a good information preservation and disclosure mechanism Publish project information early Free and unconditional access
		Able to participate in projects, and at the same time want to provide flexible working methods to avoid and control security risks. For example, during the Covid-19 epidemic, it is not required to conduct on-site research, but online and other virtual methods can be used to conduct research, etc.	<ul style="list-style-type: none"> According to the actual situation, adopt flexible working methods Develop strategies for epidemic disease control and management such as Covid -19 , HIV, etc.
	Downstream related users or	Relevant research results, which may have an impact on later downstream activities,	<ul style="list-style-type: none"> During the formulation of relevant guidelines and plans, the opinions of downstream users

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
	enterprises	including cost impact, institutional impact, etc.	or enterprises shall be fully listened to. <ul style="list-style-type: none"> The Terms of Reference (TOR) is provided to FECO and the World Bank for review prior to the recruitment of technical assistance specialists
	Other NGOs or individuals	Continue to pay attention to relevant research, hope to obtain certain innovations, etc.	<ul style="list-style-type: none"> Have a good information preservation and disclosure mechanism Free and unconditional access
2. Physical Factory: Equipment Upgrade and Procurement	FECO	Achieve the mercury emission reduction targets of the project and promote technological progress in the industry.	<ul style="list-style-type: none"> Regularly understand the progress and effects of project implementation.
		Understand the views, opinions and suggestions of all parties on the environmental and social risks and problems during the project operation, and solve the relevant appeals in a timely manner.	<ul style="list-style-type: none"> The project can listen to and collect the opinions of various stakeholders according to the stakeholder participation plan, and obtain the implementation status of the stakeholder participation plan on a regular basis
		Health and safety of participating	<ul style="list-style-type: none"> Understand the work environment health and

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
		enterprises and experts.	safety management of the project.
	Project management	Improve production efficiency and reduce pollution emissions	<ul style="list-style-type: none"> • Regularly understand the progress and effects of project implementation.
	Workers of project companies	Know in advance information about the equipment procurement and upgrade projects the company intends to implement, and understand how these projects may affect workers	<ul style="list-style-type: none"> • Have a good information preservation and disclosure mechanism • Publish project information early • Free and unconditional access • Organize employee symposiums to introduce and explain to employees the possible impact of equipment upgrades and procurement activities on workers, including possible update of work scope and requirement on skills, OHS risks, what necessary learning and preparation workers should make, and what support the company can provide during this period. • Listen to workers' opinions on equipment upgrading and procurement projects through effective channels, and incorporate these

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
			<p>opinions into project design and operation management.</p> <ul style="list-style-type: none"> • Establish and operate an effective employee grievance mechanism
	Residents or other job seekers on the market	Whether new job opportunities will be created during the upgrade and operation phase of the enterprise facilities	<ul style="list-style-type: none"> • Have a good information disclosure mechanism, including information on employment created during the construction and operation of new facilities and equipment • Free and unconditional access
	Local health department	What occupational health hazards are involved in the new equipment and processes, and whether the enterprise has conducted assessments in accordance with regulations and formulated a reasonable management plan	<ul style="list-style-type: none"> • Carry out occupational disease assessment and declaration according to the requirements of laws and regulations, and formulate reasonable occupational disease health management plans, including formulating or updating employee security systems, formulating or updating employee security training plans, and equipping employees with safety and health protection equipment, etc.
	Local people's	Whether the project help increase local	<ul style="list-style-type: none"> • Grasp the information of the company's

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
	bureau	employment.	employment needs.
	Workers of the construction side of the project and relevant investigators	Efficient, safe and smooth completion of project construction and equipment commissioning.	<ul style="list-style-type: none"> • Establish a communication mechanism with project companies.
		Project workplace health and safety management.	<ul style="list-style-type: none"> • Acquire information and knowledge of workplace health and safety management.
	Residents of the surrounding communities where the project is located	New facilities and equipment contribute to a better community environment	<ul style="list-style-type: none"> • Have a good information disclosure mechanism, including a description of the impact on the environment after the operation of new facilities and equipment. • Publish project information early. • Free and unconditional access.
In the process of construction, transportation and operation of the new facility, whether it will have an impact on the health and safety of community residents; which community residents will be affected; whether the enterprise has a corresponding management		<ul style="list-style-type: none"> • Have a good information disclosure mechanism, including i) a detailed description of the health and safety impacts that new facilities and equipment may have on the surrounding community residents during the construction, transportation and operation; ii) 	

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
		plan; what needs to be done by the community.	<p>the company's potential health and safety impact and risk assessment and main conclusions; iii) what kind of cooperation is required from community residents.</p> <ul style="list-style-type: none"> • Publish project information early. • Free and unconditional access to relevant information. • Organizing community leaders to hold discussions with residents when necessary. • Establish a community grievance mechanism
	Local bureau of ecology and environment	Whether the new equipment upgrade is conducive to the improvement of the local environment	<ul style="list-style-type: none"> • The company has established a good information disclosure mechanism
			<ul style="list-style-type: none"> •
			<ul style="list-style-type: none"> •
			<ul style="list-style-type: none"> •

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
	Affected minority residents	The impact of the project on the community environment, as well as the health and safety impact of the project during construction, transportation and operation, and equal and timely access to employment opportunities.	<ul style="list-style-type: none"> • According to the location of the project, establish an information disclosure mechanism that is convenient for ethnic minorities to obtain. For example, when an enterprise is located in an ethnic minority area and the ethnic minority has its own language, the relevant project information shall also be disclosed in Chinese and specific ethnic languages. • According to the location of the project, establish an ethnic minority management mechanism suitable for the communication habits of local ethnic groups, including setting up specific ethnic minority management agencies, arranging specific employees to manage ethnic affairs, and carrying out local exchange activities.
	Minority employees	Whether minority employees have equal and timely access to relevant project information	<p>When the project is located in an ethnic minority area:</p> <ul style="list-style-type: none"> • According to the location of the project,

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
			<p>establish an information disclosure mechanism that is convenient for ethnic minorities to obtain. For example, when an enterprise is located in an ethnic minority area and the ethnic minority has its own language, the relevant project information shall also be disclosed in Chinese and specific ethnic languages.</p> <ul style="list-style-type: none"> • According to the location of the project, establish an ethnic minority management mechanism suitable for the communication habits of local ethnic groups, including setting up specific ethnic minority management agencies, arranging specific employees to manage ethnic affairs, and carrying out local exchange activities.
		Whether ethnic minority employees be treated equally when the project has an impact on their jobs.	<ul style="list-style-type: none"> • Have a good information preservation and disclosure mechanism • Publish project information early
	Employees from	When the project has an impact on the jobs	

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
	poor families	of employees, whether there is unemployment or reduced income, thereby affecting the livelihood of the family	<ul style="list-style-type: none"> • Free and unconditional access • Organize employee symposiums to introduce and explain to employees the possible impact of equipment upgrades and procurement activities on workers, including possible update of work scope and requirement on skills, OHS risks, what necessary learning and preparation workers should make, and what support the company can provide during this period. • Listen to workers' opinions on equipment upgrading and procurement projects through effective channels, and incorporate these opinions into project design and operation management. • Establish and operate an effective employee grievance mechanism • The company has established a good information disclosure mechanism, and for project companies located in ethnic minority
	Disabled employees	When the project has an impact on the jobs of employees, whether there is unemployment or reduced income, thereby affecting the livelihood of the family.	
	Female staff	When the project has an impact on employees' jobs, increased or decreased employment opportunities, and whether there is an impact on income.	
	Ethnic and Religious Committee	Whether the project has any impact on ethnic minorities, and formulate relevant management measures according to the	

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
		relevant laws and regulations of ethnic minorities.	areas, measures to support ethnic minorities, such as employment and employment, are considered in project design and management.
	Civil Affairs Bureau	Whether the project have any impact on employees with disabilities and poor families, and whether the company has formulated relevant management measures.	<ul style="list-style-type: none"> The company has established a good information disclosure mechanism, and has listened to the opinions of relevant employees in the project design and management, and formulated assistance measures for enterprises with disabilities and poor families affected by the project.
	Women's Federation	Whether the project has any impact (including positive impact) on women employees' right and interest, and whether the company has formulated relevant management measures.	<ul style="list-style-type: none"> The company has established a good information disclosure mechanism, and has listened to the opinions of relevant employees in project design and management, and formulated management measures for potential impacts on female employees.
3. Technical assistance: project	Project management	Access to project information and a fair chance to participate	<ul style="list-style-type: none"> Have a good information preservation and disclosure mechanism

Nature of Activity	Potential Interest Groups	Key Interests and Concerns	Needs for Participation Analysis
management and communication	personnel		<ul style="list-style-type: none"> • Publish project information early • Free and unconditional access
		<p>Able to participate in projects, and at the same time want to provide flexible working methods to avoid and control security risks. For example, during the Covid-19 epidemic, it is not required to conduct on-site research, but online and other virtual methods can be used to conduct research, etc.</p>	<ul style="list-style-type: none"> • According to the actual situation, adopt flexible working methods • Develop strategies for epidemic disease control and management such as Covid-19, HIV, etc.

5.2. Stakeholder Engagement Plan

The overall goal of project stakeholder engagement plan is to disclose project construction information to relevant stakeholders as soon as possible, so that those interested in the project can obtain project information through convenient channels. Listen to and collect the opinions of stakeholders on the project design and construction; give feedback through appropriate channels and within the prescribed time limit on whether the project design and construction management have adopted relevant opinions and suggestions.

In order to achieve the above goals, it is necessary for the project unit and its construction unit to jointly establish a set of information disclosure and public participation management mechanisms for the project, clarifying the information disclosure and public participation system, responsible units, responsible persons, information disclosure and public participation time and content, basic methods, etc.

Stakeholder engagement includes two parts: information disclosure and public participation.

5.2.1. Information Disclosure

Information disclosure is an important part of public participation and a prerequisite for effective participation. The *Environmental Protection Law* specifies that enterprises should disclose their environmental information in a timely and truthful manner in accordance with the principle of combining mandatory disclosure and voluntary disclosure. For projects involving land acquisition and demolition, the *Land Management Law* (implemented from January 1, 2020) requires that, after being approved in accordance with legal procedures, the local people's government at or above the county level will announce and organize the implementation, and the scope of acquisition, the current status of the land will be announced. The purpose of expropriation, compensation standards, resettlement methods and social security, etc. shall be announced within the scope of the township (town), village and villager group where the land to be expropriated is located for at least 30 days.

Therefore, enterprises should establish an information disclosure system in accordance with legal requirements, including formulating management requirements for information disclosure, clarifying the information content to be disclosed, responsible departments, disclosure channels, disclosure time, and information archive management.

The information disclosure management of this project should include the following main aspects:

- 1) **Establish a project information disclosure mechanism:** The participation of all stakeholders in the project requires the enterprise to establish a management mechanism for information recording, preservation and disclosure. Including that the enterprise can make full use of the existing information management system,

or formulate and improve the enterprise information management system, and according to the requirements of the management system, arrange special departments and personnel to plan project-related information, research topics, evaluation documents, public consultation, etc. Information management, including disclosure, and project information management are included in the performance evaluation of relevant departments and personnel. The project information disclosure mechanism should include the recording, archiving, and disclosure of information. In the case of relevant stakeholder requirements, explain the relevant information.

- 2) **Clarify the content of project information disclosure:** At different stages of the project, each project company can disclose the applicable project information disclosure content according to the actual situation. The main information that the project should disclose is shown in **Table 5-2**.
- 3) **Employ flexible methods of participation** corporate information disclosure can be achieved through corporate websites, corporate environmental information disclosure platforms and other channels that are convenient for stakeholders to obtain timely and accurate information. Wechat groups, QQ groups, third-party organizations (such as employment recruitment agencies/platforms, bidding and procurement agencies/platforms, etc.)
- 4) **The responsible unit for information disclosure.** According to the responsible subject and implementation subject of different project activities, the disclosure of project information should be carried out by the corresponding responsible subject and/or implementation subject.
- 5) **Clarify the timing of information disclosure:** In principle, information disclosure should be made as early as possible. According to the content of different stages of project implementation, the project company will disclose it according to Table 5-2.
- 6) **Specify the language of project information disclosure:** All project information to be disclosed should include Chinese Mandarin. If the project is located in a minority area and the minority has its own language, the project information should also include the language of the minority area.

Table 5-2 Project Information Disclosure Mechanism Arrangement

Applicable Activities	Stage	Content of the Announcement	Possible Channels	Responsible Unit	Time
Technical assistance	Preparation stage	<ul style="list-style-type: none"> • Before launching the technical assistance project, publish the recruitment information of the technical assistance specialist or team, including the content, nature, duration and budget of the technical assistance activity, and external communication channels of FECO and the implementing agency of the technical assistance project. • Clarify the technical requirements of technical assistance experts, and explain strategies for epidemic and safety management 	<ul style="list-style-type: none"> • FECO webpage • Recruitment agency website or relevant platform • TA Task Outline 	<ul style="list-style-type: none"> • FECO • Recruitment agency (if applicable) 	<ul style="list-style-type: none"> • Technical assistance research specialist or unit at least 2 weeks prior to recruitment
	Research stage	<ul style="list-style-type: none"> • For the first draft of relevant research and evaluation 	<ul style="list-style-type: none"> • FECO webpage or • Expert review 	<ul style="list-style-type: none"> • FECO 	<ul style="list-style-type: none"> • After the first draft is completed

Applicable Activities	Stage	Content of the Announcement	Possible Channels	Responsible Unit	Time
		results, according to the type of results, the opinions of downstream enterprises or institutions and other stakeholders should be solicited by issuing the draft for comment or organizing expert review meetings and expert review.	meeting or <ul style="list-style-type: none"> • Other information disclosure channels 		
	Review stage	<ul style="list-style-type: none"> • The final draft of the research results should also be made public through publicity or internal industry correspondence according to the type of the results, so as to facilitate the review by stakeholders. 	<ul style="list-style-type: none"> • FECO webpage or • Reports or • Other information disclosure channels 	<ul style="list-style-type: none"> • FECO 	<ul style="list-style-type: none"> • After the final draft is completed
Construction: equipment upgrade and procurement, as well as related supporting facilities construction or	Preparation stage	<ul style="list-style-type: none"> • In the feasibility study stage before the equipment upgrade and transformation, the information about the equipment procurement and 	<ul style="list-style-type: none"> • Corporate website; • Enterprise information bulletin board 	<ul style="list-style-type: none"> • Project company 	<ul style="list-style-type: none"> • The design stage of the project, and the earlier the better

Applicable Activities	Stage	Content of the Announcement	Possible Channels	Responsible Unit	Time
capacity expansion		upgrade projects to be implemented by the enterprise is disclosed within the enterprise, and the feedback column for employees' opinions is set up to collect employees' opinions.	<ul style="list-style-type: none"> • Enterprise public account; • WeChat group, QQ group • Other information disclosure channels 		
		<ul style="list-style-type: none"> • Publicize relevant project environmental and social assessment documents, including: <ul style="list-style-type: none"> ✓ The <i>Enterprise Environmental and Social Audit or Impact Assessment Report</i> and the corresponding <i>Enterprise Environmental and Social Management Plan (ESMP)</i> on the corporate website ✓ If immigrant issues are involved, publicize the 	<ul style="list-style-type: none"> • Enterprise website; • Enterprise public account; • Other information disclosure channels 	<ul style="list-style-type: none"> • Project company • Evaluation agency 	<ul style="list-style-type: none"> • After the first draft of the Chinese version of the project-related evaluation report is formed, a round of publicity will be conducted, and the time will not be less than 14 days • After the final Chinese version of the project-related evaluation report

Applicable Activities	Stage	Content of the Announcement	Possible Channels	Responsible Unit	Time
		<p><i>Immigrant Resettlement Plan</i></p> <ul style="list-style-type: none"> ✓ If the project is located in an ethnic minority area, publicize the <i>Minority Development Plan</i> ✓ Publicity Project <i>Gender Action Plan</i> 			is formed, a round of publicity will be conducted, and the time will not be less than 14 days.
	Construction stage	<ul style="list-style-type: none"> • Facility site environmental monitoring indicators 	<ul style="list-style-type: none"> • Enterprise website; • Enterprise information bulletin board 	<ul style="list-style-type: none"> • Project company • Construction unit • Supervision unit 	<ul style="list-style-type: none"> • Every day
		<ul style="list-style-type: none"> • Updated SEP with grievance mechanism, name and phone number of the person in charge of the external coordination department of the enterprise 	<ul style="list-style-type: none"> • Enterprise website; • Enterprise public account; • Other information disclosure channels 	<ul style="list-style-type: none"> • Project company 	<ul style="list-style-type: none"> • Within two weeks after construction starts

Applicable Activities	Stage	Content of the Announcement	Possible Channels	Responsible Unit	Time
	Operation stage	<ul style="list-style-type: none"> Facility site environmental monitoring indicators 	<ul style="list-style-type: none"> Enterprise website; Enterprise information bulletin board 	<ul style="list-style-type: none"> Project company 	<ul style="list-style-type: none"> Every day
		<ul style="list-style-type: none"> Updated SEP with grievance mechanism, name and phone number of the person in charge of the external coordination department of the enterprise 	<ul style="list-style-type: none"> Enterprise website; Enterprise public account; Other information disclosure channels 	<ul style="list-style-type: none"> Project company 	<ul style="list-style-type: none"> Within two weeks after construction starts

5.2.2. Public Participation

The *Notice on the Chapter of Social Stability Risk Analysis and the Compilation of Evaluation Reports for Major Fixed Assets Investment Projects (for Trial Implementation)* (2013) clarifies that the project implementation unit and its evaluation agency shall consult the local government, relevant departments, grass-roots organizations, social groups, etc. where the project is located. Support attitude towards the proposed project. In addition, the document also requires an assessment of the completeness of public participation in the project, including whether the proposed project has fulfilled the procedural requirements for public participation, expert consultation, and information disclosure in accordance with relevant regulations.

For projects involving land acquisition and demolition, the *Land Management Law* (effective from January 1, 2020) requires that after the application documents for land acquisition are approved in accordance with legal procedures, the local people's government at or above the county level announces the relevant information for at least 30 days. Hear the opinions of the land-expropriated rural collective economic organizations and their members, village committees and other stakeholders.

Article 56 of the *Environmental Protection Law* and Article 21 of the *Environmental Impact Assessment Law*, for a construction project that may have a significant impact on the environment and should prepare an environmental impact report, the construction unit should submit the construction project environmental impact report for approval before submitting the construction project environmental impact report. , hold demonstration meetings, hearings, or take other forms to solicit opinions from relevant units, experts and the public. The environmental impact report submitted by the construction unit for approval shall be accompanied by an explanation of the acceptance or non-acceptance of the opinions of the relevant units, experts and the public. For construction projects that need to prepare an environmental impact report form, laws and regulations do not mandate public participation, but in practice, for report table projects where site selection may have an impact (such as odor-producing sewage and garbage management facilities) on sensitive surrounding points, the local ecological environment department will generally require or recommend the construction unit to carry out public participation activities.

Therefore, the project implementing enterprise and the relevant evaluation and consulting agencies hired by it must establish a public participation system in accordance with legal requirements. Before conducting public participation, A project public participation mechanism established. Combined with the analysis in **Table 5.1**, since stakeholders have their own potential interests and demands, on the basis of information disclosure, all stakeholders hope that the project will fully consider their relevant demands during the design or implementation, while establishing an information disclosure mechanism, a public participation mechanism should also be established. Including enterprises can make full use of the existing public participation management system, or formulate and improve the enterprise public participation

management system, and according to the requirements of the management system, arrange special departments and personnel, or hire a third-party evaluation agency, conduct public consultation, and collect stakeholders. The opinions of the stakeholders shall be explained, publicized and archived within the specified time on whether to adopt the opinions, how to adopt the opinions, and why not to adopt the relevant opinions, so that the opinions of the stakeholders can be fully considered in the project design and operation management.

During the preparation and implementation of public participation activities, the following factors should be considered:

- 1) **Topics to be consulted:** each project enterprise can select the applicable project public participation content according to the actual situation, as shown in Table 5-3. Enterprises can also increase the content of public participation according to the actual situation.
- 2) **Accessibility:** public participation methods should be flexible according to the characteristics of different stakeholders and their preference, such as symposiums, hearings, questionnaires, interviews, online messages, telephone exchanges, etc.
- 3) **Responsible party:** Depending on the responsible subject and implementation subject of different project activities, the responsible subject and/or implementation subject of project public participation may be different.
- 4) **Timeline:** project enterprises and related units carry out the project according to the content of different stages of project implementation, referring to the time nodes in Table 5-3.
- 5) **Record and documentation:** each public participation activity should be recorded and preserved, including meeting minutes, sign-in forms, and on-site photos, so as to understand the opinions of different interest groups, and monitor the implementation of relevant opinions situation and performance.

Table 5-3 Basic Contents of Project Public Participation Mechanism

Applicable Activities	Stage	Content of Public Participation	Possible Method	Responsible Unit	Time
Technical assistance	Preparation Phase	<ul style="list-style-type: none"> Collect inquiries and recommendations from relevant experts and institutions regarding posted job postings for technical assistance experts or teams. 	<ul style="list-style-type: none"> FECO webpage Recruitment agency website or relevant platform Published phone number or email address, etc. 	<ul style="list-style-type: none"> FECO Recruitment agency (if applicable) 	<ul style="list-style-type: none"> TA specialist and agency recruitment process
	Research stage	<ul style="list-style-type: none"> Listen to the opinions of the public, downstream enterprises or institutions on the first draft of relevant research results. 	<ul style="list-style-type: none"> FECO webpage or Expert review meeting or Other information 	<ul style="list-style-type: none"> FECO Technical assistance expert team 	<ul style="list-style-type: none"> After the first draft is completed

Applicable Activities	Stage	Content of Public Participation	Possible Method	Responsible Unit	Time
			disclosure channels		
	Review stage	<ul style="list-style-type: none"> The final draft of the published research results collects feedback from society and downstream enterprises. 	<ul style="list-style-type: none"> FECO webpage or Reports or Other information disclosure channels 	<ul style="list-style-type: none"> FECO 	<ul style="list-style-type: none"> After the final draft is completed
Construction: equipment upgrade and procurement, as well as related supporting facilities construction or capacity	Preparation stage	<ul style="list-style-type: none"> Conduct public participation within the enterprise and collect employee opinions on the feasibility study and design of upcoming or ongoing projects. Based on the comments collected, the design is updated and feedback is given to 	<ul style="list-style-type: none"> Enterprise website; Enterprise information bulletin board Enterprise public account; WeChat group, QQ 	<ul style="list-style-type: none"> Project company 	<ul style="list-style-type: none"> The design stage of the project, and the earlier the better

Applicable Activities	Stage	Content of Public Participation	Possible Method	Responsible Unit	Time
expansion		employees.	group <ul style="list-style-type: none"> • Trade union, factory manager mailbox • Other information disclosure channels 		
		Conduct public participation in other project-related assessments, including: <ul style="list-style-type: none"> • Enterprise Environmental and Social Audit or Impact Assessment Report and the corresponding <i>Environmental and Social Management Plan (ESMP)</i> • If immigrant issues are involved, publicize the 	<ul style="list-style-type: none"> • Questionnaire • Forum • Other information disclosure channels 	<ul style="list-style-type: none"> • Project company • Evaluation agency 	<ul style="list-style-type: none"> • During the evaluation process and before the first draft is published

Applicable Activities	Stage	Content of Public Participation	Possible Method	Responsible Unit	Time
		<p><i>Immigrant Resettlement Plan</i></p> <ul style="list-style-type: none"> • If the project is located in an ethnic minority area, publicize the <i>Minority Development Plan</i> • Publicity Project <i>Gender Action Plan</i> 			
		<ul style="list-style-type: none"> • Collect public opinions on the above-mentioned environmental and social assessment documents or other assessment documents related to the project, and update and give feedback. 	<ul style="list-style-type: none"> • On site • Enterprise website; • Enterprise public account; • Other information disclosure channels 	<ul style="list-style-type: none"> • Project company • Evaluation agency 	<ul style="list-style-type: none"> • After the first draft of the Chinese version of the project-related evaluation report is formed, a round of publicity will be conducted, and the time will not be less than 14 days

Applicable Activities	Stage	Content of Public Participation	Possible Method	Responsible Unit	Time
					<ul style="list-style-type: none"> • After the final Chinese version of the project-related evaluation report is formed, a round of publicity will be conducted, and the time will not be less than 14 days.
	Construction stage	<ul style="list-style-type: none"> • Accept public supervision on project site environmental monitoring indicators and other aspects 	<ul style="list-style-type: none"> • Enterprise website; • Enterprise information bulletin board 	<ul style="list-style-type: none"> • Project company • Construction unit • Supervision unit 	<ul style="list-style-type: none"> • Every day
	Operation stage	<ul style="list-style-type: none"> • Accept public supervision on environmental monitoring indicators and other aspects of facility 	<ul style="list-style-type: none"> • Enterprise website; • Enterprise information bulletin 	<ul style="list-style-type: none"> • Project company 	<ul style="list-style-type: none"> • Every day

Sustainable Mercury Management in Non-ferrous Metal Industry Stakeholder Engagement Plan

Applicable Activities	Stage	Content of Public Participation	Possible Method	Responsible Unit	Time
		enterprises	board		

5.2.3. Implemented Stakeholder Engagement

During the project preparation stage, the Foreign Cooperation and Exchange Center (FECO) of the Ministry of Ecology and Environment of the Project Office has organized and carried out a number of information disclosure and consultation activities, the main contents of which mainly focus on the activities of the project, possible environmental and social risks, and the interests of stakeholders. Initial identification and corresponding environmental and social risk management measures were discussed. The information disclosure activities that have been carried out are shown in Table 5-4.

Table 5-4 Information Disclosure Activities That Have Been Carried Out

Time	Information Disclosure Method and Content
Feb 18, 2021	<p>The FECO website issued a notice of soliciting the intention of demonstration enterprises of the "Global Environment Facility - Demonstration Project on Environmentally Sound Management and Green Production of Mercury in Non-Ferrous Metal Smelting Industry"</p> <p>http://www.fecomee.org.cn/dtxx/cgzb/202102/t20210218_821456.html</p>
Dec 24, 2021	<p>The official website of the project office released the news that the concept of the mercury environmentally sound management and green production demonstration project in the non-ferrous metal smelting industry was approved</p> <p>http://www.ProjectOfficemee.org.cn/gjgyjly/gygdsygy/xmyl/202201/t20220129_968563.html</p>

Since its launch in December 2021 and during the pilot project selection, FECO and the TA team conducted site visits and consultations with managements of the potential demonstration companies of the project, local government departments like Ecological and Environment Bureau, Industrial Parks, representatives of employees (including women representatives) and community representatives around the proposed demonstration companies. In the potential demonstration companies, different departments were interviewed, such as human resources, environment/health/safety, production, logistic, external relationship etc. Cognition of the environmental and social impacts of the project and opinions on project construction and operation,

understanding of the overall image of the project company by the surrounding communities, perception of the project, perceptions of the company's environmental and social management, and opinions on project construction and operation were discussed. See below for details of consultation conducted.

Table 5-5 Consultations conducted during the Project Preparation

Date	Location	Topics	Participants	Comments and Suggestions
20 Dec 2021	Shaoguan, Guangdong Province	Understanding about the business scope, current technology applied, constraints and expectations on the project; Qualifications for pilot company selection; Site visit to the project site;	FECO, TA team, management representatives of Shaoguan Smelting Plant of Nonfemet	Technology will be upgraded through the project; the working conditions will be improved and living environment for surrounding communities will be improved.
20 Dec 2021	Shaoguan, Guangdong Province	E&S impacts and current management system; Gender equality and empowerment;	FECO, E&S consultant, representative of the company HSE dept, HR dept, Labor union, Operation Dept, etc.	The project will be implemented within the company site without new land acquisition and person displacement involved; The current E&S management system is adequate and in place; Further E&S mitigation measure may take based on project impacts.
22 Dec 2021	Jiyuan, Henan Province	Understanding about the business scope, current technology applied, constraints and expectations on the project;	FECO, TA team, management representatives of Yuguang Group, Yuguang Zinc Industry	Technology will be upgraded through the project; the working conditions will be improved and living environment for surrounding communities will be improved.

Date	Location	Topics	Participants	Comments and Suggestions
		Qualifications for pilot company selection; Site visit to the project site;		
22 Dec 2021	Jiyuan, Henan Province	E&S impacts and current management system; Gender equality and empowerment;	FECO, E&S consultant, representative of the company HSE dept, HR dept, Labor union, Operation Dept, etc.	The project will be implemented within the company site without new land acquisition and person displacement involved; The current E&S management system is adequate and in place; Further E&S mitigation measure may take based on project impacts.
23 Dec 2021	Jiyuan, Henan Province	Understanding about the business scope, current technology applied, constraints and expectations on the project; Qualifications for pilot company selection; Site visit to the project site;	FECO, TA team, management representatives of Henan Jinli Gold and Lead Group	Technology will be upgraded through the project; the working conditions will be improved and living environment for surrounding communities will be improved.
23 Dec 2021	Jiyuan, Henan Province	E&S impacts and current management system; Gender equality and empowerment;	FECO, E&S consultant, representative of the company HSE dept, HR dept, Labor union, Operation Dept, etc.	No new land acquisition or house demolition will be involved; Internal GRM has been established and workable; HSE management system has been established;
3 Mar 2022	Jiyuan, Henan Province	Gender equality and empowerment,	Social consultant, representatives	Most of the female workers are engaged in supporting positions like HR, Finance,

Date	Location	Topics	Participants	Comments and Suggestions
		Difference of career development status between men and women, Needs and expectation of female workers;	of female workers of Yuguang Zinc Industry	General administration, control room etc. There are several measures in place to protect female workers rights and interests; The project implementation will improve the working condition and may create more positions for female; Skill training are needs for career development.
3 Mar 2022	Pei village and Liandong Village, Jiyuan, Henan Province	Socioeconomic profile of surrounding communities, Concerns, attitudes, and expectation on the pilot project; GRM	Social consultant, representative of Yuguang Zinc Industry, head of the surrounding village committees	Support to the project implementation; Living environment and working conditions will be improved; A sound GRM has been set among villagers, village committee and the ETDZ; Expect to be informed about any E&S impacts in advance;
3 Mar 2022	Pei village and Liandong Village, Jiyuan, Henan Province	Questionnaire survey on villagers around the pilot company	Social consultant, representative of Yuguang Zinc Industry, representatives of villagers	Respondents support the project implementation; It will improve the living environment; Some employment opportunities may create during the implementation; Income increasing.
3 Mar 2022	Jiyuan Henan Province	E&S management requirements for companies within the Economic and Technological Development Zone	Social consultant, representative of Yuguang Zinc Industry, representatives of the Jiyuan ETDZ, representatives of Jiyuan ecological	The ETDZ will supervise the company on EHS management measures implementation and other requirements according to law.

Date	Location	Topics	Participants	Comments and Suggestions
			environment bureau	
3 August 2022	Renhua County, Guangdong Province	Project construction activities, E&S impacts and current management system; Gender equality and empowerment;	FECO, E&S consultant, representative of the company HSE dept, HR dept, Labor union, Operation Dept, etc. of Danxia Smelting Plant of Nonfemet	The project will be implemented within the plant site; The project implementation will improve the working condition and living conditions; The current E&S management system is adequate and in place; Further E&S mitigation measure may take based on project impacts.
4 August, 2022	Renhua County, Guangdong Province	Socioeconomic profile of surrounding communities, Concerns, attitudes, and expectation on the pilot project; GRM;	Social consultant, representative of surrounding village committees and villagers	Support to the project implementation; Living environment and working conditions will be improved; A sound GRM has been set among villagers, village committee, local government, and the Plant; Expect to be informed about any E&S impacts in advance;
4 August 2022	Renhua County, Guangdong Province	Focus group discussion to understand gender equality and empowerment, Difference of career development status between men and women, Needs and expectation of female workers;	Social consultant, male and female representatives of workers of Danxia Plant	There are several measures in place to protect female workers rights and interests; No significant difference between male and female on career development; The project implementation will improve the working condition and may create more positions for female; Skill training are needs for career development.

In the survey, all the respondents expressed support for the implementation of the project, because they are either enterprise workers or have long worked or lived nearby, and the technological upgrading is beneficial for improving the working and living environment and the health of themselves and their families. The operation of the enterprise also provides a lot of job opportunities for local people. The staff of the factory can rent houses and live in the surrounding areas, which is conducive to improving the income of local residents.

6. Grievance Mechanism

According to the World Bank's *Environmental and Social Standards*, the World Bank requires each subproject to provide a grievance mechanism, process or procedure to accept and resolve the concerns and grievances of the project-affected parties on the project, especially concerns about the project's environmental and social performance and appeals. The grievance mechanism will be consistent with the nature, scale, potential risks and impacts of the sub-project. It aims to resolve relevant issues quickly, employ an understandable and transparent process, provide timely feedback to interested parties in a language they understand, and ensure that there are no additional costs and costs incurred by the parties affected by the project during the appeal process.

Considering the potential risks and impacts of the project, the grievance mechanism of this project includes two types: community grievance mechanism and labor grievance mechanism. Among them, the community grievance mechanism is mainly aimed at the project preparation, construction and operation stages, the affected residents and other potential affected people in the surrounding communities, including the public concerned about the project activities, the relevant complaints of the project, the receipt, registration, processing and follow-up feedback of complaints. Mechanism. The labor grievance mechanism is mainly aimed at project workers, including direct workers, contract workers, contractor employees, etc., and the reception, registration, processing and tracking feedback mechanism for complaints and complaints that may be raised during the construction and operation of the project, including labor injuries, dissolution of labor relationship, financial compensation, salary arrears, etc.

6.1. Community Grievance Mechanism

In view of the potential environmental and social risks and impacts in the process of project implementation and operation, the community grievance mechanism is mainly through the establishment of the project enterprise community grievance mechanism, and the effective connection with the local community's grass-roots grievance mechanism to form the project's community grievance mechanism. Solve the timely reception, processing, feedback to the affected persons, recording and archiving of the appeal time.

Based on the above basic understandings, the project's community grievance mechanism first requires enterprises to establish a set of project community grievance management mechanisms, including the establishment of a management system for project community grievance handling, in which the management departments and personnel are specified, and the names and contact information of relevant personnel

are announced to the public. Contact persons of major villages and units in the surrounding communities and their contact information, clarify the requirements for the collection, processing, feedback, archiving and recording process, time limit and management personnel of grievance incidents, and a certain budget can be arranged every year.

Grass-roots grievance mechanisms for local communities are usually divided into four stages:

- Stage 1: If the affected people in the project area are dissatisfied with the project implementation, they can file an oral or written appeal to the village committee/community or the project enterprise. If it is an oral complaint, the village committee/community or the project implementation agency should handle it and record it in writing. The village committee/community or the project implementing agency should solve the problem within 2 weeks, or directly call the complaint hotline 12345 or 12369;
- Stage 2: If the affected people in the project area are still dissatisfied with the decision of Stage 1, they can file a complaint with the sub-district/township and relevant agencies (Complaints and Calls Bureau) after receiving the decision, and the management agency should handle it within 2 weeks;
- Stage 3: If people are still dissatisfied with the decision of Stage 2, they may, after receiving the decision, appeal to the administrative organization with jurisdiction level by level for arbitration in accordance with the *Administrative Procedure Law of the People's Republic of China*.
- Stage 4: If people are still not satisfied with the arbitration decision, after receiving the arbitration decision, they can file a lawsuit in a civil court according to the *Civil Procedure Law*.

The grievance mechanism established by the project enterprise should be well connected with the community grassroots grievance mechanism. As stated above, in stage 1 of the grassroots grievance mechanism, when the affected people in the community usually have opinions on a certain issue, they can report to the village committee/community. The committee/community submits an oral or written grievance and can also submit it to the project enterprise. Regardless of whether the grievance is filed through the community or through the project enterprise, when the project enterprise receives any relevant grievance, it should cooperate with the relevant departments to actively respond, handle and give feedback, and keep track of the whole process.

The community grievance mechanism flowchart is shown in Figure 6-1.

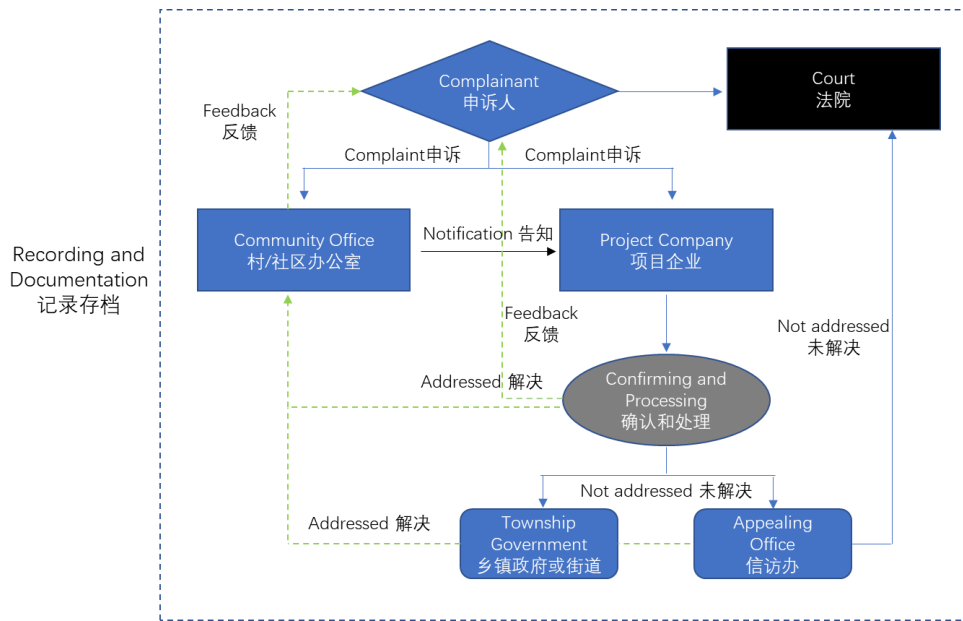


Figure 6-1 Community Grievance Mechanism Flowchart

If the affected people are not satisfied with the response or resolution obtained through the above channels, they may appeal to the environment and society specialist of FECO or the environment and society specialist of the World Bank. The environmental and social specialist will make a record, consult relevant departments, provide a reply or solution, and feedback the reply or solution to the project enterprise. The affected people may propose a complaint against any aspect of the project construction. The contact details of FECO are shown in Table 6-1. Before the implementation of the sub-project, the project enterprise should inform the affected people of the appeal channel, contact person and contact information through the network platform, residents' meeting, public notice board and other ways as soon as possible, so that the affected people fully understand their right to appeal. At the same time, media tools should be used to strengthen publicity and reporting, and comments and suggestions from various parties will be sorted into information provisions. In addition, in ethnic minority areas where native languages and scripts are widely used, bilingual reception staff will be provided at each stage, and the telephone numbers and addresses of the staff should be made public.

Table 6-1 Publicity Form of Contact Information for Complaint Channels

Unit/Department	Contact Person	Telephone	E-mail
FECO	Zhao Mei	010-82268576	zhao.mei@fecomee.org.cn

6.2. Labor Grievance Mechanism

According to the requirements of World Bank Environmental and Social Standard 2 (Labor and Working Conditions), the project must establish a grievance mechanism for the direct staff and contract workers involved in the project, and ensure that the relevant workers are aware of it so as to receive and handle grievances from project workers about work issues. Take steps to make the grievance mechanism accessible to all project staff. Grievance mechanisms will be commensurate with the nature and scale of the project, and potential risks and impacts, with immediate resolution of relevant issues through easy-to-understand and transparent procedures, and should not prevent staff from seeking remedies through other judicial or administrative avenues.

The *Civil Code* of China has similar requirements on labor dispute management, including seeking solutions to complaints through arbitration procedures and the legal system.

The event of labor and personnel disputes, project workers can appeal through the internal grievances of the enterprise. If the grievance is not reasonably resolved, the project workers have the right to appeal to the arbitration procedure or the judicial system; project workers can also directly appeal to the arbitration procedure or the judicial system. make a complaint.

(1) The methods of internal grievance are as follows:

- First: Employees can submit an opinion complaint form in writing or orally to the superior supervisor, party branch, trade union leader, discipline inspection committee or general manager to reflect their opinions and complaints level by level, and the company's personnel department will keep relevant records.
- Second: Employees can also file complaints or complaints through the company's anonymous mailbox or suggestion box. The company's personnel department regularly collects opinions and submits them to the corresponding management personnel for investigation and resolution. For any cases related to women's rights and interests or SEA/SH cases, employee can raise their complaints to the women's organization under the labor union.

(2) The arbitration procedure or the judicial system grievance process is as follows:

- The first stage: employees can seek help from the labor security supervision and law enforcement agencies of the labor department, or they can directly submit labor dispute arbitration. The labor security supervision and law enforcement

agency shall investigate whether the case is on file within 5 working days after receiving the complaint. For cases that meet the principles of acceptance, they shall be settled within 60 working days, and complicated cases can be extended by 30 working days upon approval. For any cases related to women's rights and interests or SEA/SH cases, employee can approach to the Women's Federation for help to defense their rights.

- The second stage: If the employee is not satisfied with the processing result, he can submit a labor dispute arbitration within 6 months. The limitation period for applying for arbitration of labor disputes is one year. Labor dispute arbitration includes two levels, including mediation and arbitration. Usually, mediation is recommended first. If a mediation agreement is reached within 15 days from the date the labor dispute mediation organization receives the mediation application, both parties sign a mediation agreement; if no mediation agreement is reached within 15 days, the parties may apply for arbitration in accordance with the law. The arbitration tribunal shall end the case within 45 days from the date when the arbitration commission accepts the arbitration application. If the case is complicated and requires an extension, with the approval of the chairman of the Arbitration Commission, the extension may be extended and the parties are notified in writing, but the extension shall not exceed 15 days.
- The third stage: If the arbitration award is not made within the time limit, the parties may file a lawsuit with the people's court on the labor dispute. The results include three types of pre-case mediation, case-filing acceptance, and non-acceptance. If the case is not accepted, a written explanation shall be provided to the applicant.

6.3. Grievance Recording and Reporting System

Project companies will publish the project's complaint and appeal handling mechanism on their respective websites. Upon receiving a grievance, the respective environmental and social commissioner will record it in a grievance log or briefing and investigate and address it. The grievance log or brief should include: the date the grievance was received, the name of the complainant, a brief description of the grievance, the action taken (including remedial action/resolution/outcome), and the date the grievance was finally resolved. The professional should immediately notify the complainant of the decision/resolution/action in writing/by calling/texting the complainant. In the enterprise labor grievance mechanism, for grievances related to gender-based violence/SEA/SH, project companies will accept relevant grievances in both real-name and anonymous ways, respecting the complainant's request for confidentiality. At the same time, the recipients of complaints from project enterprises should include both male and female staff. The document template for complaint handling and feedback is shown in Table 6-2.

The environmental and social specialist of the project enterprise should regularly classify and analyze the complaint records or briefs, including the main sources, types, processing progress, processing results, evaluation and experience summary of the complainants and complaints. The relevant records should be kept properly and the FECO and the World Bank should be provided with a summary of complaints received and dealt with on a regular basis, including through semi-annual reports.

Table 6-2 Complaint Registration Form

Receiving unit:		Time:		Location:	
Complainant Name/Anonymity:		Contact Information			
Complaint Content					
Appeal Type	<p>A . Labor and work environment</p> <p>B . Community Health and Safety</p> <p>C . Land Use and Resettlement</p> <p>D . Information Disclosure and Public Participation</p> <p>E . Other, please specify</p>				
Measures Taken					

Processing Progress	
Is the solution satisfactory?	A. Yes B. No, please explain why:
Advice to avoid similar incidents from happening again	
<p>Notes: 1. The recorder should truthfully record the content and requirements of the complainant's appeal. 2. The grievance process should be free from any interruptions and obstacles. 3. The proposed solution shall reply to the complainant within the specified time.</p>	

7. Organizations

Depending on the type of activities involved in the project, the project should also be divided into two parts: technical assistance (TA) and physical engineering. In this process, all institutions should cooperate with stakeholders to ensure that stakeholders in all aspects of the project can effectively participate in the project. Figure 7-1 shows the role and position of the project in stakeholder engagement.

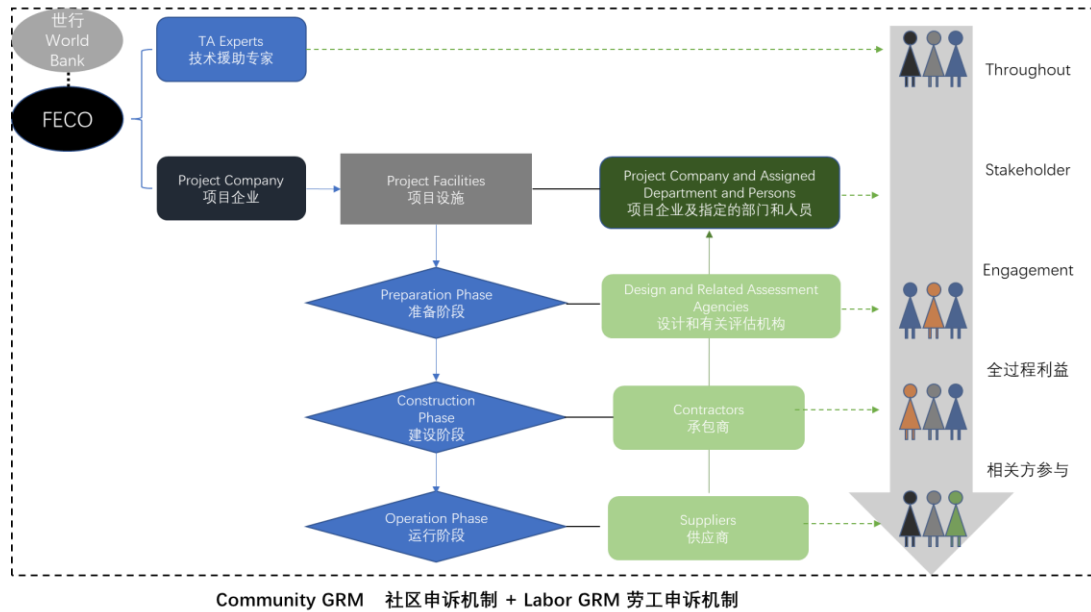


Figure 7-1 Stakeholder Engagement Organization Chart

According to the implementing agencies involved in each sub-project and their main management or work content, their respective responsibilities in the stakeholder participation mechanism are different. The following will be clarified respectively.

The World Bank

- Verifying the implementation of the stakeholder engagement plan ;
- Conduct regular monitoring to ensure that the implementation of the stakeholder engagement plan is acceptable;
- Review the operation of the appeal mechanism through the semi-annual monitoring report to confirm the effective operation of the mechanism;
- Conduct regular site visits and provide necessary support .

FECCO

- Organize experts, scholars and relevant enterprises and institutions to carry out

various forums, symposiums, etc.;

- Consultation with recruiting agencies (if applicable) and interested experts in various technical assistance (TA) recruitment processes;
- Collect progress reports, information disclosure, public participation, and appeal records submitted by each sub-project;
- Collect public comments, appeals, etc. on sub-projects;
- Publicize relevant research results and evaluation reports;
- Collect opinions and suggestions from the public, experts, enterprises and institutions during the publicity period, and organize experts to improve the report;
- Record and archive various results reports and public consultation processes.

Technical Assistance (TA) Specialist

- During the implementation period, listen to the opinions of downstream enterprises, institutions and relevant social organizations and individuals;
- During the review period, cooperate with FECO to publicize the research results, collect opinions and suggestions from downstream enterprises, non-governmental organizations and individuals, etc., and improve the relevant research results.
- Document the results reports and public consultation process as part of the research results.

Local Government Authorities

- Receiving complaints and consultations from local communities during the implementation of the project;
- Communicate with project enterprises, conduct investigation on community complaints or consultation, and provide feedback to complainants and consultants in a timely manner;
- Supervise the implementation of information disclosure and public participation activities of project enterprises, such as environmental impact assessment, etc.

Project Company

- Develop a management mechanism for project stakeholder participation, including information disclosure mechanism, public participation mechanism, and appeal mechanism;
- Designate the department and personnel responsible for the management of community stakeholders, the liaison of the community grievance mechanism, and the liaison of the enterprise labor grievance mechanism;

- Publish the name and contact information of the departments, personnel and community grievance mechanism contacts for stakeholder management;
- Publicly disclose the name and contact information of the contact person of the enterprise labor grievance mechanism;
- Connect with relevant government agencies and communities, accept inquiries, etc., and conduct various reviews and approvals as required;
- Accepting consultations from employees, community residents, experts and scholars, NGOs, etc.;
- Publicize the sub-project-related information (such as environmental discharge information, etc.) and assessment documents;
- Collect public comments on publicity, and organize personnel or experts to update the assessment report;
- Archive the public comments and publicize and give feedback in appropriate ways. For example, comments on an evaluation report can be included as part of the final draft, and the final draft can be publicized online, etc.;
- Monitor the operation of stakeholder participation, and include descriptions and records about the operation of each stage in the monitoring report.

Evaluation Agency

- During the evaluation process, conduct information disclosure and public participation activities in accordance with relevant laws and regulations, policies, guidelines and the sub-project "Stakeholder Participation Plan";
- Cooperate with project companies to publicize relevant evaluation reports and accept public opinions;
- Include public comments as part of the final evaluation report and publish the final draft as a means of public feedback.

Construction Contractor

- Designate the person responsible for external liaison, and announce the name and contact information of the contact person;
- Continuous disclosure of environmental information during construction;
- Negotiate with the project company on an appropriate external liaison mechanism;
- Accept public consultation, and make explanations, processing, feedback and records;
- Regularly report the participation of external stakeholders to the project company and submit relevant records.

Supplier

- When the public raises questions about a supplier's products and services, the relevant supplier should cooperate with the project company to explain, handle and provide information feedback.

8. Monitoring and Reporting

The implementation of the stakeholder participation plan will be incorporated into the environmental and social impact management plan, and monitoring and reporting will be conducted every six months. Monitoring can be carried out by the project unit itself, or it can be supported by specialized agencies or environmental and social experts. The Project Management Office should summarize the implementation progress of each enterprise and report to the World Bank. The content of monitoring includes:

- The establishment and improvement of the stakeholder management mechanism, including the information disclosure mechanism, the public participation mechanism and the grievance mechanism;
- Implementation of the information disclosure plan and public participation plan;
- The functioning of the grievance mechanism;
- Records and records management;
- Remaining issues;
- Whether the stakeholder engagement plan is complete and what improvements are needed.

This Stakeholder Participation Plan will be a dynamic document that will monitor and evaluate the implementation of stakeholder participation activities during the implementation process. When necessary, it may be updated periodically as appropriate to ensure that stakeholder participation activities can achieve the desired objectives.