



NON-TECHNICAL SUMMARY

Iași County Solid Waste Management Project, Romania

15/09/2014

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1 Introduction

The European Bank for Reconstruction and Development (EBRD) is considering providing financing to Iași County Council (the "County") in order to develop the waste infrastructure in the County in accordance with EU standards. The IMWS (Integrated Waste Management System for Iasi County) Project will focus on enhancing the quality of waste collection and management services provided to the County population (circa 830,000) through expansion of waste collection points, enhancing waste recycling systems and setting up new waste sorting facilities and waste warehouse structures.

Taking into account the current situation in Iași County, local legislation, as well as the Regional Waste Management Plan for Region 1 North East and the County Waste Management Plan, the integrated waste management system that is going to be set up must provide:

- Coverage with sanitation services of 100% both for urban and rural areas by zonal licensed operators;
- The implementation of the separate collection of recyclable waste at county level and setting up of sufficient sorting capacities to ensure the targets for recovery of packaging waste are reached;
- The implementation of municipal biodegradable waste treatment methods (home composting, composting, mechanical-biological treatment) to ensure the targets for the diversion of biodegradable waste from landfills are reached;
- Closure of Hârlău, Pașcani, Târgu Frumos and Tomești non-compliant landfills;
- Strengthening of the technical and managerial capacity in Iași County in the implementation and operation of an integrated waste management system; and
- Raising the awareness of the population on issues related to the project benefits, separate waste collection, recycling of waste and home composting.

WSP UK Ltd ("WSP") has been commissioned by the EBRD to undertake a top level Environmental, Health, Safety and Social (EHSS) Assessment of the Iași County Solid Waste Management investment project in Romania. This review has been undertaken in advance of the potential investment by the EBRD.

This Non-Technical Summary (NTS) provides an overview of the proposed developments to be financed by the EBRD within the context of the Project and key environmental issues which have been identified. An Environmental and Social Action Plan (ESAP) and Stakeholder Engagement Plan (SEP) were also developed and the key points from these plans have been detailed in this document.

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2 Description of Current Operations

The current operators responsible for the collection of waste in Iași County are:

- SC Salubris SA Iași - operates the compliant landfill at Țuțora, the collection and transport of waste in Iași City and 50 rural areas and is subordinated to Iași Local Council. SC Salubris SA also provides street sanitation services.
- RAGCL Pașcani - operated the closed (2009) non-compliant landfill in Pașcani. It performs the collection and transportation of waste in Pașcani and Ruginoasa, as well as street sanitation services. RAGCL Pașcani is a public company and is subordinated to Pașcani Local Council.
- SC Termoserv SA Târgu Frumos - operated the non-compliant landfill in Târgu Frumos until its closure in 2012. The collection and transportation of wastes in Târgu Frumos is performed by SC Termoserv SA Târgu Frumos and is subordinated to Târgu Frumos Local Council which also provides street sanitation activities.
- SC ECO-SAL Hârlău SA (former public sanitation service in Hârlău) - operated the closed (2009) non-compliant landfill in Hârlău town. It transports and collects waste in Hârlău, Scobinți and Deleni communes and performs street sanitation activities. The operator is a public company, subordinated to Hârlău Local Council.
- SC Predemet SA Podu Iloaiei - is a privately-owned company, which performs collection and transportation services for municipal waste from the population, commercial organisations and other institutions, as well as street sanitation services for Podu Iloaiei town and six other communes.
- SC Dagsrom SRL Moțca - is a privately-owned company, which collects and transports household waste from the population, commercial organisations and other institutions, serving Moțca, Ciohorăni and six other communes.

Other operators include: SC Local Servicii SRL Flamanzi (Botoșani County), SC Raabro SRL Iași, SC Diana Service SRL Dumbrava Rosie (Neamț County), SC Rossal SRL Roman, SC ANG Green Company SRL, SC Pado Impex SRL Târgu Frumos. These operators perform collection and transportation services for municipal waste from the population, commercial organisations and other institutions, in 12 communes.

A transfer station is in operation in Hârlău town that can sort approximately 8,000 tonnes per annum (tpa). Four sorting stations are currently in operation (one near Hârlău town - 2,200 tpa, one in Răducăneni commune - 300 tpa, with a further one in Țuțora commune, near the compliant landfill - that can sort up to 29,000 tpa of recyclables in two working shifts). A fourth one was finished at the end of 2011, in Șipote commune with a permitted capacity of 200 tpa but is currently not operational. The priority measures, which are objectives of this project, are the following:

- Implementation of the separate collection of recyclable waste both in urban and rural areas;
- Implementation of the separate collection of household residual waste both in urban and rural areas;
- Implementation of home composting in 25% of the households in rural areas;
- Development of 2 transfer stations in Ruginoasa and Bălțați;
- Development of 1 sorting station for recyclable waste in Ruginoasa and extension of the existing Țuțora sorting station;
- Development of one Mechanical Biological Treatment (MBT) plant in Țuțora;
- Finishing the development of Țuțora composting plant;
- Construction of the 3rd compartment of the first cell at Țuțora compliant landfill; and

- Closure of Pașcani, Hârlău, Târgu Frumos and Tomești urban non-compliant landfills.

3 Description of Project Facilities

Țuțora

Țuțora will be a waste management centre for the sorting, treatment and disposal of wastes. It will comprise a number of different waste management activities which include the only compliant landfill in Iași County. The landfill will have a surface area available for all cells of 55.65ha and a total overall capacity of 8,176,000m³.

The landfill has been operational since 2009 by SC Salubris SA and had disposed of 200,000 tonnes (250,000m³) by the end of 2010. A flare is proposed to be installed in the future but is not currently in place. The landfill gases are currently vented to atmosphere.

In addition to the landfill, Țuțora will operate a sorting station which will consist of two sorting lines (one existing and one proposed). The existing sorting line, which was initially designed only for Iași Municipality's needs, has a permitted limit of 10,500tpa but could sort up to 29,000tpa of recyclables per annum based on two working shifts. The new sorting line will have a capacity of 22,000tpa based on two working shifts.

Each sorting line has 12 sorting posts, so that 6-12 different fractions can be simultaneously sorted. The sorting platform will be situated at a height of about 3.80m from the ground floor, so that the sorted rejects will be discharged at the bottom of the sorting lines, in a large container of about 32m³. The fractions sorted by categories and colours will be baled by means of the horizontal press. The bales will be piled in the delivery area. The loading onto the transport trucks is carried out by forklift truck.

The site has a Wastewater Treatment Plant (WWTP) for the treatment of the collected leachate from the landfill. The leachate goes to a 200m³ lagoon prior to being pumped to the WWTP. The lagoon is fitted with a level indicator to pump the leachate to the WWTP when it reaches a pre-set level. The leachate is treated by collection in a tank for pH adjustment prior to effluent passing through a sand filter system, a charcoal filter system and then a Reverse Osmosis (RO) process.

The clean wastewater is then discharged to a lagoon and from here it goes to a channel which ends in a soakaway off-site. The reject concentrate from the process is collected in a 19m³ tank prior to being spread back on the landfill. The operator of the WWTP stated that this would aid breakdown of the biodegradable fraction in the landfill.

The Mechanical Biological Treatment (MBT) plant will be built at the same location as the sorting station and the existing compliant landfill. The capacity of the MBT plant is 140,000 tpa of which 2/3 is biodegradable and 1/3 is non-biodegradable. It has been considered that 80% of the total quantity (112,000tpa) will pass through a trommel screen (a large sieve).

The MBT process incorporates composting which involves the transformation of the organic matter into solid rejects, heat, carbon dioxide and water by the action of micro-organisms in the presence of oxygen. Thus, greenhouse gas emissions (mainly methane) during disposal are reduced. The treatment process includes:

- Mechanical pre-treatment; and
- Accelerated aerobic biological treatment.

Mechanical Separation. Prior to biological treatment, the incoming waste will be mechanically treated whereby only the suitable biodegradable fractions will be separated for subsequent treatment. The mechanical treatment facility will include manual separation of bulky waste; a bag opener; shredder; a trommel sieve (75mm); and separation of metals via magnetics (ferrous) and eddy-current separators (non-ferrous). As a result of the

mechanical separation, 28,000tpa of rejects will be landfilled or recovered (metals). The remaining 112,000tpa will undergo a subsequent aerobic decomposition process.

Biological Treatment. The first stage is an intensive aeration phase in wall surrounded lanes (trenches). Based on the expected daily volumes, the process will be conducted in 32 lanes, each 5m wide and 3m high. The floor beneath the lanes is perforated for intensive aeration. The material is mechanically turned every other day. The process last 28 days, whereby the mass of the throughput is reduced by approximately 33%. The area needed for the intensive aeration phase is about 1.24ha. The second stage includes maturation of the partially stabilised output (75,040tpa). The maturation phase will be conducted in a metal shed construction on an area of 1.17ha. The material will be piled and mechanically turned regularly for aeration. The maturation process will last six weeks. The expected loss through this phase is 5% and the output will be 71,288tpa. The stabilised output will be subsequently landfilled.

The composting plant will compost only biodegradable waste collected separately from Iași municipality - the biodegradable fraction from parks, gardens and market waste. The proposed composting station is a pilot project, with a processing capacity of 10,000tpa.

The shredded and mixed wastes are transported to the aerobic biological treatment hall, where they are distributed in rows (92.5m long, 5m wide at the basis, 2.4m high). The aerobic biological treatment process lasts for approximately 12 weeks. Periodically, the windrows are turned over with a special vehicle with water spraying system to add moisture.

The aerobic biological treatment area is of metallic construction (hall) with specially tilted concrete floor, so that the dirty water resulted from the storage of fermentable wastes can be collected and discharged to a pit, from where they will be re-circulated over the waste rows with a windrow turning vehicle, ensuring the optimum humidity necessary for aerobic biological treatment.

The maturation area is of metallic construction (shed type), without a side closing. The entire surface of the shed is constructed of concrete and is surrounded by guarding ditches to capture rainwater. On the inside, it has a drainage system to capture dirty water.

The completely fermented material is transported with the front loader in this area, where it is strained with a trommel with 20mm holes. The fraction that passes through the holes is mainly composed of organic matter and small inert materials such as: rocks, glass pieces and ceramic.

Hârlău

At Hârlău there is a non-compliant landfill which ceased operation in 2009. The capacity of the landfill was 500,000m³ with an actual disposed waste volume of 400,000m³. The surface area of the landfill is approximately 1.6ha. The operator of the landfill was the Public Sanitation Service Hârlău.

In the valley floor below the landfill is the Hârlău sorting and transfer station. The waste is received and goes into a reception pit with an elevated conveyor which takes the waste into the building to a number of picking stations for cans, glass and metals. Residual waste is fed into an incinerator with two chambers and a low stack. The incinerator is capable of taking 2m³ per batch.

Pașcani

Pașcani is the location of a non-compliant landfill which ceased to operate in 2009 with a capacity of 800,000m³ with an actual disposed waste volume of 600,000m³. The surface area of the landfill is approximately 3ha and the site was operated by RAGCL Pașcani.

Tomești

Tomești is the location of a non-compliant landfill which had a capacity of 3,000,000m³ with an actual disposed waste volume of 2,500,000m³ of waste. The site covers an area of 20ha, was operated by S.C. Salubris S.A and closed in 2009. A temporary dam has been built to the east of the site to allow the water to drain in order to construct the leachate collection basin. The site for the flare had also been prepared but the flare has not been installed yet.

Ruginoasa

The waste that will be transferred within this station is collected from zone 1, as well as the sorting rejects coming from Ruginoasa sorting station. The waste will be compacted prior to transport in 24m³ containers. The waste will be unloaded from the platform via a feed hopper. The capacity of Ruginoasa transfer station will be 44,000tpa. The transfer technology is automated with a pressing head to compact the waste and the transfer system will have five containers of 24m³. The transfer station will have 11 containers with a capacity of 24m³ each. The site will also have five long haul trucks for the transfer of the containers to Țuțora.

Șipote

This sorting station has been designed for the segregation of paper/cardboard, plastic and ferrous metals. Glass will be directly stored in containers and will not be processed on the sorting line.

There will be one sorting line. The feeding of the sorting line is done automatically via feed hopper, transport conveyor and mechanical processing of waste.

The facility will use manual separation for all fractions except for metals which will be separated with magnets. The separation of ferrous and non-ferrous metals is done automatically (magnetic or electro-magnetic conveyor for selecting metals with direct discharge into the container).

The sorted fractions will then be baled for transport.

The site is constructed but not operational until contractual arrangements are in place. The permit has an annual capacity of 200 tpa but the site is likely to be capable of achieving the same level of transfer and sorting as Hârlău with the limiting factor being the amount of waste generated locally.

Târgu Frumos

This is a non-compliant landfill that closed in 2012 with a capacity of 200,000m³ and a disposed waste volume of 80,000m³. The site occupies an area of 1.5ha and was operated by SC Termoserv SA Târgu Frumos. Currently existing waste is being compacted by machinery and covering layers of material are being added to the surface, these being transported to site by trucks.

Bălțați

Bălțați transfer station will receive waste collected from zone 2. This station will be built as a simple station, meaning that waste will be transported without prior compaction, from the collection vehicles directly in the open containers of 32m³. The containers will then be transported with trailer trucks, i.e. two containers will be transported at the same time.

The capacity of Bălțați transfer station will be 17,000tpa. The transfer technology is simple, without a pressing head for compaction and the transfer system will have 3 containers of 32m³. The total number of containers

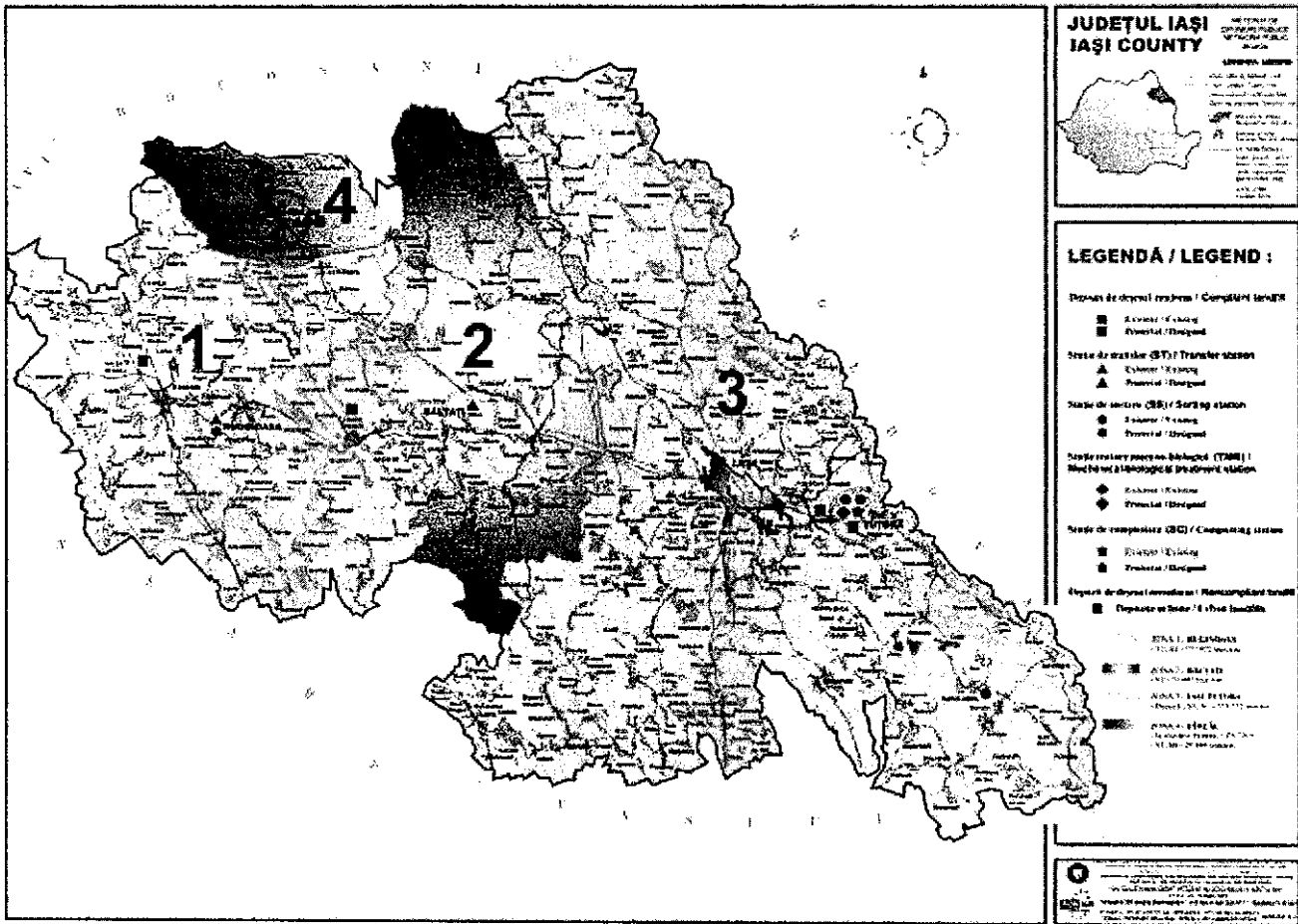
needed for the transfer station is 11 with each having a capacity of 32m³. The facility will also have 2 long haul trucks for the transfer of waste to Țuțora.

Răducăneni

The Răducăneni sorting station was not visited due to insufficient time available during the audit. The capacity of Răducăneni station will be 300 tpa.

The figure below shows the collections zones and the location of existing and proposed sites.

Figure 1: Collections Zones and Location of Existing and Proposed Sites



4 Environmental Health, Safety and Social Review of Proposed Scheme

Scope of Work

The Environmental and Social Due Diligence (ESDD) audit was carried out during July 2014 and comprised the following:

- i) Review of corporate level EHSS management and investment discussions with Iași County Council staff and waste contractors;
- ii) Review of all key EHSS background information and documentation provided;
- iii) A visit to Țuțora, Hârlău, Pașcani, Tomești, Ruginoasa, Șipote, Târgu Frumos, Bălțați; and
- iv) Reporting.

Where necessary, mitigation measures have been proposed and used to develop an Environmental and Social Action Plan (ESAP).

EHSS Review and ESAP Recommendations

In general the project is aligned and compliant with EU standards. However, overall the level of EHSS management is considered to be in need of greater centralised ownership and in need of the management of EHSS liabilities due to risks being placed with contractors, although this is understood to be reviewed by third parties on behalf of the County.

However, based on site observations, staff interviews and the review of key documentation including an Environmental Impact Assessment (EIA), a number of recommendations are proposed for implementation to fully meet best practice and achieve full compliance with relevant corporate, National, EU standards and the EBRD Performance Requirements. These are summarised in the Table 1 below and form the actions that are proposed in the ESAP.

Table 1: Summary of the Action Areas for inclusion in the ESAP

Review Areas	Actions Areas
Corporate EHS Management	<ul style="list-style-type: none"> □ Disclose a Non-Technical Summary (NTS) of the project □ Assign staff member with overview of Environmental, Health and Safety (EHS) responsibilities for the project (County Council) □ Develop and implement an environmental management systems and audit program (County Council)
Planning and Permits	<ul style="list-style-type: none"> ■ Obtain all environmental permits (building, operational and closure) prior to commencement of relevant project stages (all sites) ■ Assess the site sorting capacities and, if necessary, vary environmental permits accordingly (Tuțora, Șipote and Răducăneni)
Environmental Performance	<ul style="list-style-type: none"> □ Annually report on soil and groundwater data due to elevated levels of metals detected (Tomajil landfill) and summarise monitoring data at all other non-compliant landfills □ Evaluate the reuse and recycling opportunities – reject concentrate from treated wastewater, treated water and MBT residues (Tuțora landfill) □ Report on the finalised landfill stability design (Fărgu Frumos and Hârțau landfills) □ Assess the integrity of the existing permanent and temporary dams and evaluate levels of contaminants in nearby water bodies (Tomajil landfill) □ Avoid the use of virgin materials for capping (non-compliant landfills) □ Develop dust nuisance avoidance measures at landfills and from transportation vehicles (all landfills)
BAT Assessment	<ul style="list-style-type: none"> ■ Undertake a Best Available Techniques (BAT) review of MBT process prior to completion of design and purchase of process equipment (Tuțora MBT plant) ■ Establish timescale for the flaring system and undertake a BAT review of gas collection arrangements including the economics for energy recovery (Tuțora landfill) ■ Assess the best practicable environmental option of disposal of the leachate reject concentrate and establish BAT controls if the practice continues (Tuțora landfill)
Health and Safety Performance	<ul style="list-style-type: none"> □ Improve security arrangements (all landfill sites) □ Implement pest control measures (Tuțora landfill) □ Evaluate and improve health and safety arrangements including PPE, demarcated walkways / access routes, testing electrical equipment, use / location of first aid kits & fire extinguishers, supply of sun protection / drinking water and develop procedures for confined spaces (all operational sites) □ Implement fire prevention and response measures (Tuțora) □ Assess incinerator human health risks from air emissions and hot surfaces risk perspective (Hârțau) □ Review job functions at sorting and transfer stations, to determine the extent of repetitive tasks and if a worker rotation programme is needed (all sorting stations) □ Undertake site specific bioaerosols risk assessments (all sites) and one off bioaerosol monitoring tests where needed
Social and Employment	<ul style="list-style-type: none"> ■ Review and update or develop written employment / social policies ■ Review procedures for effective management of subcontractors including the use of Construction, Environmental Management Plans and including a Transport Management Plans ■ Develop and implement a Stakeholder Engagement Plan (SEP) including a grievance mechanism

5 Summary of EIA Gap Analysis

The Romanian legislation on EIA (2002, 2009, 2010) is in accordance with the EU EIA Directive and the EIA for the IWMS Project was found to be generally compliant with the EU EIA Directive. Requirements of EU EIA Directive Annex III that are documented in the EIA include:

- The description of the project characteristics;
- Description of emissions and residues;
- Details of alternative options;
- An assessment of the likely significant effects during construction and operation;
- Proposed mitigation and offsetting measures during construction and operation;
- Description by the developer of the forecasting methods used to assess the effects on the environment;
- Interrelationships of impacts upon environmental aspects;
- Difficulties encountered by the developer in compiling the required information for the EIA;
- A Summary of the EIA.

From undertaking a gap analysis of the EIA against the EU EIA Directive, the gaps that have been identified are listed below.

- Construction in accordance with Environmental Management Plans to mitigate any potential impacts. It has been verified that the existing contractors have developed the necessary Environmental Management Plans / Waste Management Plans to be used prior to construction (not required by the EIA but by the Environmental Permits issued by the EPA). In the ESAP, it has been recommended that the development of Plans for future construction contractors should be undertaken;
- Impact of cost increases on the population due to the concentration of landfilling at the Tutora site. No mitigation measure is provided in relation to this potential social impact. However financial and economic analysis has been conducted that includes a review of tariffs and affordability. In conclusion, the Ministry of Environment and Sustainable Development has issued a guide for the general plans for municipal solid waste management projects that require monthly waste expenses to not exceed 1.5% of the medium monthly income per household set by the minimum wage per economy for the household inhabitants. The fee is estimated (covering operator profit, initial and future investment) per person per year, including VAT, to be 5.8 RON/person/month with a lower fee estimate provided from gains in recycling, projected including VAT, to be 4.99 RON/person/month. The fee is estimated (covering operational and maintenance costs) per person per year, including VAT, to be 3.03 RON/person/month. It is projected that after 2016, the fee will drop under the 1.5% threshold;
- Cumulative impacts relating to transport impacts and a recommendation for the development of Transport Management Plans has been proposed in the ESAP;
- Source of soil for capping not addressed and often observed to be virgin material. During the EIA public consultation process, a question was raised by the EPA on where the materials covering the non-compliant landfills of Tomesti, Pascani, Harlau Târgu Frumos would be procured. The response provided by the designer, Romair was that "The procurement of the materials is the responsibility of the entrepreneur. The materials can be obtained by mixing clay obtained from works within the project at Baltati, Ruginoasa and Tutora with sand and gravel". In the ESAP, it has been recommended that the avoidance of the use of virgin materials for capping should be undertaken;

- Although slope stability / seismic effects are identified as a low potential and zero probability of landslides, it has observed that the Târgu Frumos and Hârlău landfills showed sign of slippage with cracks and the contractor has acknowledged that this is an issue and they have not yet finalised a landfill stability design. The Environmental Permit states that the static or dynamic stability of the design works is not covered within the permit but is the responsibility of the project owner. In the ESAP, a recommendation has been proposed for a finalised stability design; and
- Negative social impacts have not been identified associated with physical and/or economic displacement.

6 Greenhouse Gas Assessment

Greenhouse Gas (GHG) emissions are released from combustion activities such as flares, indirectly from electricity use and transportation. GHG emissions are not assessed and reported by Iași County Council.

The emissions of GHG across the Iași County Council waste management sites are estimated and detailed in Table 2 below based on energy usage and local / national energy factors.

Table 2: Global Warming Potential for each Site (TCO₂ Equivalent)

Site	Energy Use*
Țuțora	2,886
Bălțați	No data
Ruginoasa	No data
Șipote	No data
Răducăneni	No data
Hârlău Transfer	No data
Total	No overall data

* Based on national emission factor for Romania of 0.701 TCO₂/MWhe

The four non-compliant landfills have not been included as the greenhouse gas emissions would be associated with the landfilling of the biodegradable material some of which has already occurred. It would be difficult to quantify where the landfilled waste is in terms of its phase of decomposition to calculate an expected release.

Therefore, the overall carbon equivalent emissions from the operational sites is 2,886 tonnes of CO₂ equivalent for electricity use at Țuțora only (not including landfills).

However, the total release for each of the landfills can be calculated on the basis of the waste disposed of and is calculated in Table 3 below.

Table 3: Global Warming Potential for Landfills (TCO₂ Equivalent)

Site	Deposited Waste m ³	Deposited Waste T*	Methane Generated m ^{3**}	Methane Generated T***	GWP****
Țuțora Landfill	8,176,000	1,635,200	277,984,000	199,314	4,584,222*****
Târgu Frumos landfill	80,000	16,000	2,720,000	1,950	44,850
Tomești landfill	3,000,000	600,000	102,000,000	73,134	1,682,082
Pascani landfill	600,000	120,000	20,400,000	14,627	336,421
Hârlău landfill	400,000	80,000	13,600,000	9,751	224,273
Total	12,256,000	2,451,200	416,704,000	298,776	6,871,848

*based on conversion factor in HM Revenue & Customs (HMRC) landfill tax to convert m³ to T of waste

**based on top end of range reported in literature search of 100-170m³ methane per tonne of Municipal Solid Waste (MSW)

***based on conversion rate of 0.717kg/m³

**** based on Global Warming Potential (GWP) conversion for methane reported in Integrated Pollution Prevention and Control Reference Document on Economics and Cross-Media Effects July 2006

***** Over the operational lifetime of the landfill

For the non-compliant landfills the overall release from methane generated by the degradation of the biodegradable waste would be 2,287,626 tonnes of CO₂ equivalent emissions over their lifetime if the gas is not captured within the flare system. Some of these emissions will already have occurred dependent on the length of time the waste has already resided in the landfill. The total for all landfills is estimated to be 6,871,848 tonnes of CO₂ equivalent emissions.

7 Stakeholder Engagement Plan

A Stakeholder Engagement Plan (SEP) has been developed with the objective of identifying key stakeholders and ensuring that, where relevant, they are informed in a timely manner of the potential impacts of projects. The plan also identifies a formal grievance mechanism to be used by stakeholders for dealing with complaints, concerns, queries and comments. It will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary. The SEP includes the following:

1. Public consultations and information disclosure requirements;
2. Identification of stakeholders and other affected parties;
3. Overview of previous engagement activities;
4. Stakeholder engagement programme including methods of engagement and resources; and a
5. Grievance mechanism.

Stakeholders could be individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views. The definition applied to identify the key stakeholders is:

'any stakeholders with significant influence on or significantly impacted by, the work and where these interests and influence must be recognised if the work is to be successful'.