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Zophia Wind Farm

Preliminary Stakeholder Engagement Plan

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Glossary

Abbreviation or Term	Definition
AOI	Area of Influence
CHSP	Community Health and Safety Plan
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
EP	Equator Principles
IFC	International Finance Corporation
NGO	Non-Governmental Organisations
SEP	Stakeholder Engagement Plan
PS	Performance Standards (IFC)
PR	Performance Requirement (EBRD)
WTG	Wind Turbine Generator

1 Introduction

This document forms a Preliminary Stakeholder Engagement Plan (SEP) developed by Wood on behalf of NBT AS for Zophia Wind Farm located near Melitopol, Ukraine (the Project).

The SEP describes the planned stakeholder consultation and engagement process for the Environmental and Social Impact Assessment (ESIA). It outlines a systematic approach to stakeholder engagement that will inform the scope of the ESIA and gather information on environmental and social topic areas that will assist the identification, assessment and mitigation/monitoring of predicted project impacts.

The overall approach for the SEP and the wider Environmental and Social reporting have been based on the Equator Principles (EPs), International Finance Corporation (IFC) Performance Standards (PSs) and European Bank of Reconstruction and Development (EBRD) Performance Requirements (PRs) as the Project is likely to require financing from other International investment banks.

The SEP is a live document and it will be regularly monitored, reviewed and updated as the ESIA progresses and project planning evolves. 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 should be read in conjunction with the ESIA and Environmental and Social Management Plan (ESMP) prepared for this Project.

The objectives of this SEP are to:

- Describe the regulatory and Lender requirements for consultation and disclosure.
- Identify and prioritise key stakeholder groups, focusing on Affected Communities.
- Describe the strategy and present the timetable for sharing information and consulting with each of these groups.
- Describe the internal resources and individual responsibilities assigned to implement stakeholder engagement activities.
- Describe how the effectiveness of the SEP will be monitored and how lessons learned will be recorded, with the aim of improving stakeholder engagement activities during the lifecycle of the project.

Communication will continue as further planning and design activities are progressed and through Project implementation.

Key stakeholders have been identified in this document however, as the document is considered a 'live' document, the stakeholder list will continue to be updated as the ESIA process progresses. If any stakeholders have not been identified, they should contact NBT AS and ask to be included in future communications/engagement opportunities. Furthermore, this document describes the way in which any concerns or grievances will be handled by NBT AS.

The SEP provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

This document contains the following sections:

- Chapter 2 – Project description.
- Chapter 3 – Roles and responsibilities.
- Chapter 4 – Regulatory requirements.
- Chapter 5 – Identification of stakeholders.
- Chapter 6 – Summary of previous stakeholder engagement.
- Chapter 7 – Future stakeholder engagement.
- Chapter 8 – Monitoring and reporting.
- Chapter 9 – Grievance mechanism.

2 Project Description

2.1 Description of Project

Zophia Wind Farm (the Project) consists of 163 wind turbine generators (WTGs).

The Project is located near Melitopol in the Zaporizhia Oblast (region) of southeast Ukraine. An overhead transmission line (OHL) is proposed to be constructed to connect the Project to the nearest sub-station with capacity at Molochansk.

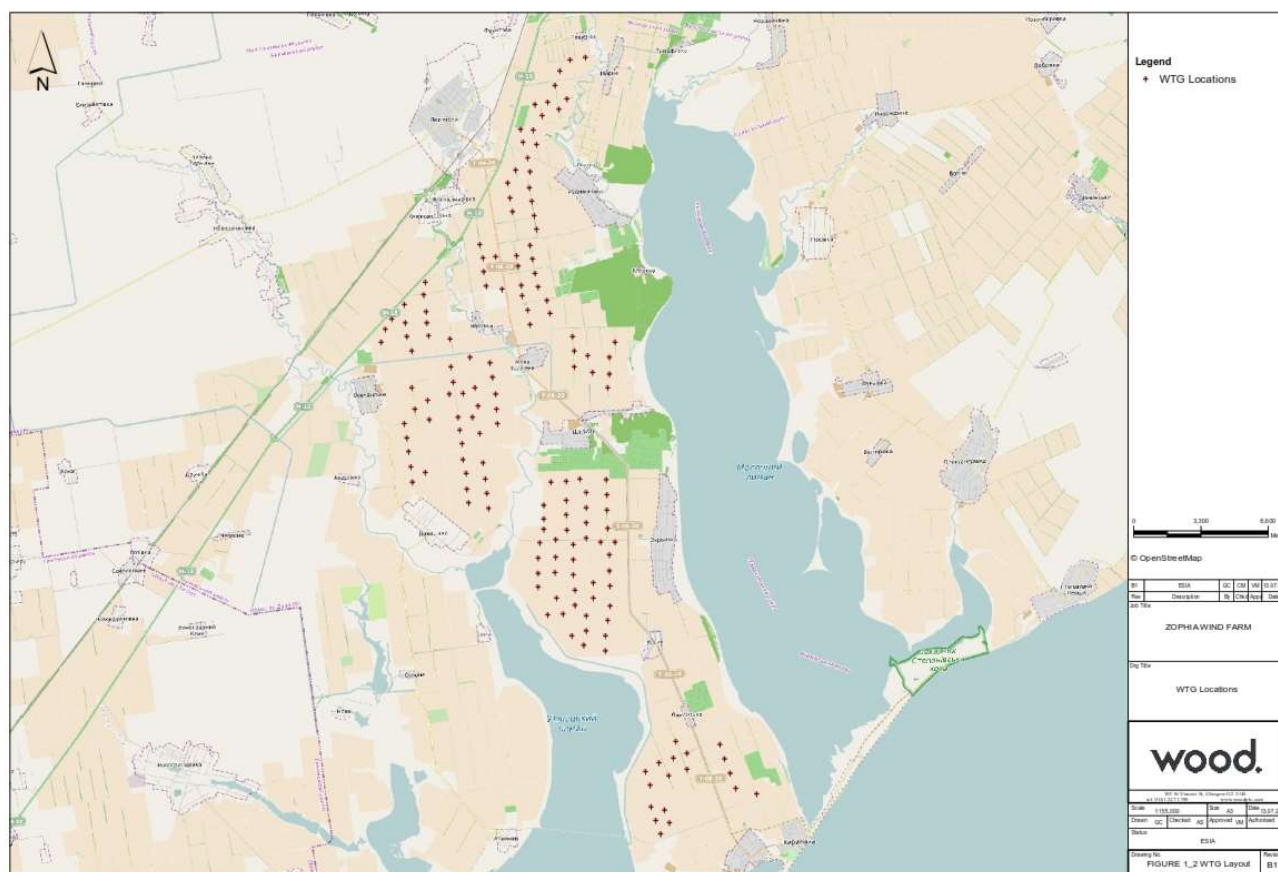


Figure 2-1: Project Layout

2.2 Need for the Development

The need for the Project arises because, on a national level, it will provide a valuable source of renewable energy for use within the Ukraine to support infrastructure development and the national renewable energy development goals including those set forth in:

- The Decree of the Cabinet of Ministers of Ukraine "On the National Action Plan for Energy Efficiency until 2020" as of November 25, 2015.

- The Order of the Cabinet of Ministers of Ukraine "On the National Action Plan for Renewable Energy for the Period until 2020" as of October 1, 2014 N902-p.
- The Order of the Cabinet of Ministers of Ukraine "On programs for increasing energy efficiency and reducing energy consumption" as of 17.12.08. No. 1567-p.
- Energy Strategy of Ukraine for the period up to 2035: "Security, Energy Efficiency, Competitiveness", approved by the order of the Cabinet of Ministers of Ukraine as of August 18, 2017 No. 605-p.
- The Law of Ukraine "On Amendments to Some Laws of Ukraine to Ensure Competitive Conditions for Electricity Production by Alternative Energy Sources" No. 514-VIII from 04.06.2015.

In relation to the Energy Strategy of Ukraine stated above, the aim of the Strategy is to provide for the society and the economy demand in fuel and energy resources in a technically safe, secure, cost-effective and environmentally sound manner to ensure improved living conditions of the population¹. The target status of Ukraine's energy sector, at which the Strategy is aimed, is determined based on the need to:

- Meet the population's demand in both normal and emergency conditions.
- Ensure the technically reliable and safe operation of the power supply system.
- Provide for the economic efficiency of Ukrainian power supply systems and the energy sector in general.
- Ensure the efficient energy use by the population and the national economy.
- Find an environmentally sound solution to the environmental and climate impact of the energy sector.
- Enable the state to form and implement policies aimed at protecting national interests regardless of the existing and potential internal and external threats to the energy sector.

The quantitative and qualitative targets of the Strategy are defined with due account of the need to ensure the sustainable development of the Ukrainian society in the long term, national economy priorities, and international obligations of Ukraine.

The Project shall also:

- Provide the district with much needed power generation capacity.
- Strengthen Ukraine's energy sector by helping to diversify its energy sources.

¹ <https://www.iea.org/policiesandmeasures/pams/ukraine/name-167037-en.php>

- Reduce the country's reliance on fossil fuel combustion, as approximately 36% of its electricity production is from coal-fired thermal and combined heat and power (CHP) power plants.
- Improve the safety of the country's outdated electricity production, as approximately 55% of its electricity production is from Soviet-era nuclear power plants.

At the regional and local levels, the Project is needed because it will provide a much-needed reliable energy supply to the south-eastern Zaporizhia Region of Ukraine and also provide local jobs and other economic improvements, especially during the construction phase.

3 Roles and Responsibilities

Responsibilities of parties of the Zophia Wind Farm project are presented below.

The Project proponent is NBT AS. NBT AS has the overall responsibility of developing, reviewing, and updating the SEP and ESMP. NBT AS will also be responsible, as the Project Developer, IPP and EPC Manager, for day to day management and implementation of the SEP, ESMP and relative contract obligations of the contractors. It will also on a regular basis, monitor and audit the implementation of the SEP and ESMP. NBT AS will provide appropriate training for their staff in relation to implementing the SEP and ESMP.

The Engineer, Procure and Construct (EPC) contractor will carry out the detailed Project design, source plant and materials and construct the Project. Given the role in the Project, the EPC Contractor shall have the responsibility of managing the environmental, social, health and safety performance of the majority of the workforce. The Contactor shall comply with the provisions of the SEP and any subsequent revisions.

The Lenders will require compliance with the respective international standards as set out in Section 4 below.

3.1 NBT AS Contact Details

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4 Regulatory Requirements

The Project is committed to implementing all Project-related stakeholder engagement activities in accordance with the IFC PSs and EBRD PRs, considered best practice for industrial developments; and with the EPs which represent a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risk in project financing.

The EPs apply to all new project financings with total capital costs of USD \$10 million or more across all industry sectors globally. The EPs represent a framework for project financing, which is underpinned by the revised IFC Environmental and Social Review Procedures (ESRPs) (July 2007), the revised IFC Social and Environmental Sustainability and PSs, new Sustainability Policy, and Disclosure Policy (effective 21 February 2006).

The extent to which the EPs apply to a project depends on whether the country in which the project is located is "Designated" or "Non-Designated". Projects within Non-Designated countries such as Ukraine are required to follow the standards and guidelines as set out in the IFC PSs and Environmental Health and Safety Guidelines. In addition, the Lender requires the Project to be developed in accordance with the EBRD PRs.

The relevant aspects of these project requirement frameworks are highlighted below.

4.1 IFC Requirements

Consultation and disclosure of information is a key part of the ESIA and Project development process. The consultation principles align with the relevant Equator Principles and IFC Performance Standards, with the aim to ensure all reasonable public opinions are adequately considered.

Equator Principle 5 (Consultation and Disclosure) requires the Project to undertake a process of consultation with affected communities in a manner that provides them with opportunities to express their views on Project risks, impacts, and mitigation measures, and allows the Sponsor to consider and respond to them. The consultation process should be undertaken in a manner that is inclusive, culturally appropriate, free from intimidation, timely and informed.

Equator Principle 6 (Grievance Mechanism) requires that a grievance mechanism must be developed which allows Project-affected parties to raise grievances to either the Sponsor or a third party who will seek to resolve the grievance as appropriate.

IFC PS 1 (Social and Environmental Assessment and Management Systems) is the most relevant of the IFC PSs to this SEP. PS 1 structures the way in which environmental and social issues are to be handled and serves as the core around which the other PS are framed. It requires community engagement, project information disclosure, consultation and grievance mechanisms to be implemented

PS 1 states that "stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities".

IFC Performance Standard 1 (2012) provides a summary of the requirement for disclosure:

"Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The client will provide Affected Communities with access to relevant information on:

- (i) the purpose, nature, and scale of the project;*
- (ii) the duration of proposed project activities;*
- (iii) any risks to and potential impacts on such communities and relevant mitigation measures;*
- (iv) the envisaged stakeholder engagement process; and*
- (v) the grievance mechanism."*

IFC Performance Standard 1 provides a summary of the requirement for Informed Consultation and Participation (ICP):

"For projects with potentially significant adverse impacts on Affected Communities, the client will conduct an ICP process that will build upon the steps outlined above in Consultation and will result in the Affected Communities' informed participation. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The consultation process should (i) capture both men's and women's views, if necessary, through separate forums or engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. The client will document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the Affected Communities and will inform those affected about how their concerns have been considered."

IFC Performance Standard 1 [36] outlines the requirement for period reporting back to stakeholders:

"The client will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. If the management program results in material changes in or additions to the mitigation measures or actions described in the Action Plans on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually."

5 Identification of Stakeholders

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation during the ESIA process, taking into consideration the range of engagements that have already been completed. Stakeholder identification is an ongoing process, and potentially new stakeholders will continue to be identified during different stages of the Project.

5.1 Stakeholder Mapping and Defining the Area of Influence

Stakeholders for the ESIA were identified through the following steps:

- Using information from the National EIA and information provided by NBT AS, Project aspects (activities that require a degree of environmental and/or social management) and the potential impacts (arising from the activity) activities were reviewed.
- The geographical area of influence (as defined by IFC) was analysed to map areas that may be directly or indirectly affected for specific topic areas. The combined area identified reflects the project's Area of Influence (AOI). Full details are set out in the ESIA however this includes consideration of the following aspects:
 - a. Air quality (e.g. potential area experiencing increased vehicle emissions and dust levels during construction).
 - b. Noise (e.g. potential area experiencing increased noise levels during construction and operation).
 - c. Shadow Flicker (e.g. potential area experiencing shadow flicker during operation).
 - d. Visual (e.g. areas with significant visual impacts associated with the Project during construction and operation).
 - e. Ecology, biodiversity and ecosystem services (e.g. the physical footprint of the Project from the clearance of vegetation).
 - f. Community health, safety & wellbeing (e.g. transportation routes, geographical area where workers could interact with local community).
 - g. Land use (e.g. land that may be temporary/permanently used by the Project).

- Existing secondary data on environmental and social conditions within the Project AOI was reviewed, to identify the presence of possible environmental and social sensitivities. Information sources used include the latest satellite imagery from Google Earth, and local knowledge from Wood's local consultant who has extensive experience of working in the region.
- Stakeholders were subsequently discussed at a stakeholder engagement session held with Wood's local consultant.

5.2 Stakeholder Identification

For the purposes of the Project, a stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the project and its potential impacts. The objective of stakeholder identification is therefore to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the project.

As a part of the development of the public consultation program for the ESIA, stakeholder identification was performed in order to determine all individuals, local communities, organizations, educational, research, and design organizations, and governmental authorities who might be potentially affected by, or might affect the outcome of, the proposed Project. The criteria used in the stakeholder identification process included the proximity of local residents' households to the Project site, the level of potential interest in the Project among federal and local governmental authorities, and scientists and local/international NGOs with interest.

The following stakeholder groups were defined during the identification process:

- Government agencies related to the Project's approval and review.
- Non-governmental organizations (NGO's) including Professional associations and Public organizations.
- Local communities.
- Contractors and supply chain

Stakeholder identification is an ongoing process, requiring regular review and updating of the stakeholder database as the Project proceeds.

A summary of the various stakeholder groups is provided below.

5.3 Government Agencies

5.3.1 Regulatory Authorities

National and regional Government agencies are important stakeholders within the Project's engagement process, both as sources of information, and as those issuing the necessary permits for the Project. It is therefore important to engage with all appropriate regulators from an early stage and to maintain relationships with these agencies throughout the Project lifecycle. The following regulatory authorities were identified for consultations:

- Ukrainian Government Ministries:
 - a. Ministry of Ecology and Natural Resources of Ukraine
 - b. Ministry of Social Policy.
 - c. Ministry for Development of Economy and Agriculture
 - d. Ministry of Culture.
- Zaporizhzhya Regional State Administration.

5.3.2 Other Local and District Authorities

The Project falls within the Yakymivka District of the Zaporizhzhya Region of Ukraine. The following local stakeholders were identified:

- Yakymivka District Council.
- Yakymivka District State Administration.
- Village Councils.

Yakymivka District State Administration is the main legislative body of the district and is located in the rural town Yakymivka. The District State Administration lies below the Yakymivka District Council also located in Yakymivka.

The administrative organisation of Yakymivka district comprises two settlement councils (Kyrylivka and Yakymivka), a single district council (Raion) council, twelve rural councils and two joint territorial communities.

Yakymivka joint territorial community was established in 29 October 2017 as a result of merging ten rural councils: Yakymivka, Volodymyrivka, Gorky, Davydivka, Peremoha, Radyvonivka, Rozivka, Tavriyska, Chornozemna, and Sheluihy. The community include 32 villages and covers an area of 1,055.4 km².

Kyrylivka joint territorial community was established in 29 October 2017 as a result of merging three rural councils: Kyrylivka, Okhrymivka and Atmanai and currently included these villages, along with a further five villages. The total area of joint territorial community is 661.6 km².

A summary of the hierarchy of the various administrative units is illustrated in Figure 5-1.

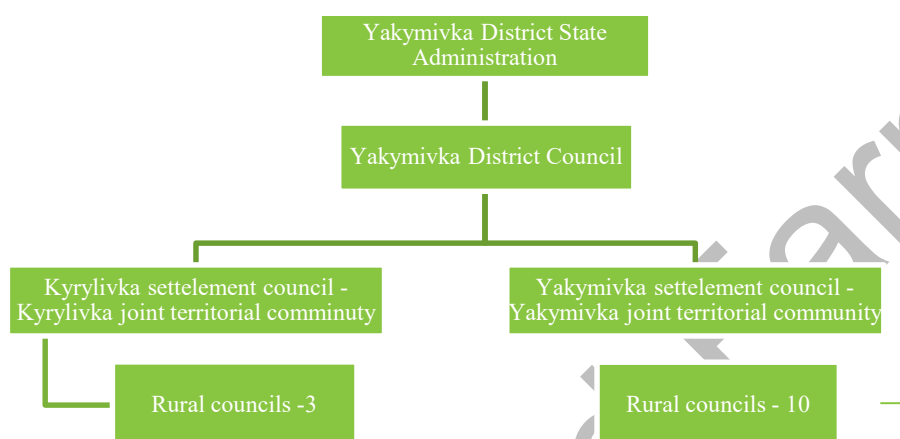


Figure 5-1: Administrative Hierarchy

5.4 National and International NGOs

Key national and international NGO stakeholders include:

- Ukrainian Wind Energy Association.
- Agency for Rational Energy Use & Ecology.
- Alliance New Energy of Ukraine.
- National Ecological Centre of Ukraine.
- Environment, People, Law (EPL).
- European-Ukrainian Energy Agency.
- NGO Working Group on Climate Change.
- Birdlife International.

5.5 Local Groups operating in the Community

Other local community groups and charitable organizations operating within the Project area are shown in Table 5-1 below. Note that the groups identified are active across all Project areas.

Table 5-1: Local Community, Charitable Organizations, and other Organizations

No.	Name of Group
1.	Yakymivka District Organization of the Ukrainian Community of Hunters and Fishermen
2.	Oriana-Agro Agribusiness Company
3.	NGO Vse Mozhlyvo
4.	Social Fund Charity
5.	Union of Entrepreneurs and Employees of Yakymivka District

5.6 Communities and Community Leaders

Chairmen and Chairwomen of local communities (Village Councils) should be engaged on a continuous basis in a discussion of all aspects of the Project that may impact on their community, lands and other assets. Meetings with these groups will follow local practices and norms and will be held prior to any wider communication in the villages in order to respect existing structures.

As per EBRD PR 10, NBT AS will make reasonable efforts to verify that such persons do, in fact, represent the views of affected communities and that they are facilitating the communication process by communicating the information to their constituents and conveying their comments to NBT AS, as appropriate.

The following Project affected communities immediately surround the Project:

- Atmany.
- Davydivka.
- Kyrylivka.
- Okhrymivka.
- Radynonivka.
- Sheliuhy.
- Yakymivka.

Information on the community of Nove is not included as there are no directly impacted people (such as farmers who are using land) that shall be impacted. However at a broader level, the community of Nove was included in the stakeholder engagement activities as the villages of Fruktove, Taschynyak, Kyrpychne, and Danylo-Ivanivka, which make up the community of Nove, are very close to the Project.

The following are residents most likely to be impacted by the Project:

- Land-users, including farmers and others whose access to land may be disrupted by the Project.
- Households located in the zone of shadow flicker impact.
- Households located in the zone of elevated noise levels.
- Households or land users located in areas susceptible to increased dust levels.
- Households or communities located along transport route who may experience disturbance, increased noise and nuisance and health and safety impacts.

5.6.1 Vulnerable Groups

During the land use survey, questions were asked about the types of vulnerable people that are present within the Project area, and the sources of their vulnerability. The following groups were identified:

- Single parent families, families with low income and / or a number of children as they have many dependants, and household income has to provide for all members of the household;
- The disabled who often require additional support for daily living, and access to high-quality health care facilities;
- The retired, elderly and those in ill-health who often require additional support for daily living, and access to high-quality health care facilities;
- Unemployed, including young people;
- Migrants, including Yezidis from Armenia;
- Military veterans who have returned from a location of recent conflict. Some veterans find returning to civilian life difficult after experiencing conditions of conflict, experience stress, depression and difficulties in maintaining domestic relationships.
- Refugees from Donbass and other regions located in eastern Ukraine.

6 Summary of Previous Stakeholder Engagement Activities

Stakeholder engagement to date has focused on public consultation surrounding planning regulations, negotiations undertaken to obtain land for the Project, engagement with local council and community members, and public presentations of the Ukrainian Environmental Impact Assessment ("EIA") (required by Law of Ukraine "On Environment Impact Assessment" No. 2059-VIII).

A summary of stakeholder engagement activities completed with local stakeholders during preparation of the ESIA is presented in Table 6-1 along with details of the key discussion points. At the start of each meeting, a broad overview of the Project was provided alongside details of the purpose of the specific meeting or focus group discussion. Information from engagements with the following communities are included in the table below: Atmanay, Davydivka, Kyrylivka, Kyrylivka, Nove, Okhrimivka, Radyvonivka, Shelyhu and Yakymivka.

A summary of the stakeholder engagements completed to date is provided below, further detail can be found within the Project ESIA.

Table 6-1: Summary of Stakeholder Engagement to Date

Date	Stakeholder/Attendees	Location	Key Discussions
30 August, 2017	Up to 22 participants and representatives of Azovpromenergo LLC (previous Zophia II Project Company)	Volodymyrivka Village Council	Public hearing on EIA of planned construction and operation of 42.5MW outside of Volodymyrovka and Radyvonivka.
June 18, 2019	Up to 10 participants of representatives of Yakymivka State Administration, Yakymivka UTC, Kyrylivka UTC, Representatives of LLC - Azovinvestprom (previous Zohpia I Project Company), Azovpromenergo LLC (previous Zophia II Project Company), and Zophia III LLC	Yakymivka State Administration, Yakymivka UTC, Kyrylivka UTC	Expectations for the construction and operation of the Project were discussed: discussion of the positive and negative impact and expectations of attracting local resources, opinions of local residents on the Project, employment of local residents during construction and operation of the Project.
July 18, 2019	To be completed	Okhrimivka Village Hall	Consultations with Okhrimivka village Strategic Impact Assessment and Detail Plan of Territory for construction of Wind Power plant with installed capacity of 750MW
July 26, 2019	To be completed	Yakymivka State Administration, Yakymivka UTC, Kyrylivka UTC	Public hearing on Strategic Impact Assessment and Detail Plan of Territory for construction of Wind Power plant with installed capacity of 750MW
September 25, 2019	Up to 40 participants — representatives of Yakymivka UTC village districts	September 25, 2019	Up to 40 participants — representatives of Yakymivka UTC village districts.
October 24, 2019	17 participants, 2 representatives of Azovpromenergo	Yakymivka State Administration, Assembly Hall	Public Hearing on EIA Report for Zophia III Introduction by the department to the EIA procedure; Presentation of the EIA and main findings; questions and answers.

Date	Stakeholder/Attendees	Location	Key Discussions
October 24, 2019	3 participants and 2 representatives of Zophia III LLC.	Yakymivka State Administration, Assembly Hall	Public Hearing on EIA for Zophia III Introduction by the department to the EIA procedure; Presentation of the EIA and main findings; questions and answers.
November 12, 2019	To be completed	Yakymivka State Administration, Assembly Hall	To be completed
November 12, 2019	To be completed	Yakymivka State Administration, Assembly Hall	To be completed
16 December 2019	Women from farmers' households (17 people attending). NBT AS. Wood local consultant.	Atmanay	Women are actively involved in the local community to organise events, such as dancing and concerts for children. Women have an equal say in the household as to how any future income gained from leasing land could be spent. Women have fewer employment opportunities compared to men. Many people are vulnerable in the community as few have high income. In general, women support the project as it will generate new economic opportunities although they expect the majority of the employment positions created to be filled by men.

Date	Stakeholder/Attendees	Location	Key Discussions
16 December 2019	Community leaders (9 people attending). NBT AS. Wood local consultant.	Atmanay	<p>The community wishes to generate 'green tourism' opportunities as they are close to the estuary where there is a variety of birdlife people may be interested to see.</p> <p>Key needs of the community are improved road conditions as they are mostly in need of repair, development of beach facilities as at the moment the beach is empty, care homes for people with long-term illness, and the repair of water pipes.</p> <p>Farmers often help with community needs as they are the ones with money available.</p> <p>The land in the vicinity of the windfarm is sometimes used for the purpose of hunting.</p> <p>There is a possibility that people may move towards the project area during construction seeking employment and other economic opportunities.</p> <p>Negative impacts may include impacts to nature and positive impacts could include development of the region and job creation.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
16 December 2019	Farmers (9 people attending). NBT AS. Wood local consultant.	Atmanay	<p>All of the people present have been resident in the community since birth.</p> <p>There are two agricultural associations which represent the collective interests of farmers.</p> <p>Machinery is leased for agricultural processing.</p> <p>Key challenges experienced includes wind erosion and agricultural pests. These problems are increasing in frequency because of reduced rain and the low humidity of soil.</p> <p>The land in the vicinity of the windfarm is sometimes used for the purpose of hunting.</p> <p>There are no conflicts between different land users or farmers.</p> <p>The project is not expected to impact their livelihood as the turbines are few in their area, and so they are not very concerned.</p> <p>Benefits include annual income payments from the use of land, and also from the future generation of clean energy.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
11 December 2019	Community leaders (36 people attending). NBT AS. Wood local consultant.	Davydivka	<p>The community is characterised by agricultural land and has a nearby national nature reserve area.</p> <p>Key challenges include the condition of the road network, regional water supply, lack of piped gas to some communities, illegal landfilling of waste, flooding in local streets after heavy rain, and heat transfer lines are often in a poor state of repair.</p> <p>The community is expecting various forms of financial support from the wind energy developer to address the issues above.</p> <p>There have been occasional conflicts associated with land due to the removal of boundary trees in the past, although these are rare.</p> <p>A school is present within the potential shadow flicker zone and the windows face the direction of the turbines. This is causing some concern.</p> <p>Vulnerable people include those who are retired and people with disabilities.</p> <p>The leaders expect local people to be employed. There is a possibility that people will come into the area, seeking work during construction. This happened on another project where people came into the area and caused problems, as they were ill with tuberculosis (TB) and this spread the disease. The workers need to have a medical examination before they come into the sites/communities.</p> <p>Other negative impacts include added pressure on the local road network, the generation of noise and shadow flicker impacts. Positive benefits include local job opportunities, future income into the community and clean energy.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
11 December 2019	Municipal establishment of secondary school of I-III degrees in Vovchanske. NBT AS. Wood local consultant.	Davydivka	<p>The percentage of pupils who attend school on a regular basis is 82%, the reason for not having 100% is due to laziness of the pupils.</p> <p>Attendance does vary by gender with more girls attending as they are more responsive.</p> <p>Key challenges faced by the school includes the lack of an internet connection and poor-quality teaching resources and materials.</p> <p>Vulnerable people in the community include people with disabilities.</p> <p>The school is located next to a public road that will be used for the transport of the wind turbines and they are concerned about the potential increased risk of road transport movements.</p>
11 December 2019	Women from farmer's households (23 people attending). NBT AS. Wood local consultant.	Davydivka	<p>Women's skills include decorative art needlework and dancing.</p> <p>Women want to become part of the workforce.</p> <p>Women and men make the decision as to what to spend in the household equally.</p> <p>Vulnerable people in the community include people with disabilities and retired people. Disabled people find it very hard to move around in the community.</p> <p>Negative impacts from the project include damage to road networks and the generation of shadow flicker and noise.</p> <p>Positive impacts include increased community income and job opportunities</p>

Date	Stakeholder/Attendees	Location	Key Discussions
11 December 2019	Farmers (14 people attending). NBT AS. Wood local consultant.	Davydivka	<p>The farmers have been resident in their community on average for 30 years.</p> <p>The farmers work within big companies or on their own. Some of the big companies have large areas of land.</p> <p>The crops grown include cereal and other technical crops. Some of the crop fields are irrigated.</p> <p>Many of the farmers lease machines for the processing of agricultural crops. Large trucks are used to transport agricultural products to the seaport.</p> <p>Key challenges include the presence of agricultural pests.</p> <p>Local conflicts have occurred between farmers due to the removal of boundary tree lines.</p> <p>The project has the potential to impact farmers if construction works start during the summer. The farmers would like an annual payment as compensation.</p> <p>Overall the farmers do not support the project and don't believe the wind farm developer will benefit the local community.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
10 December 2019	Community leaders (10 people attending). NBT AS. Wood local consultant.	Kyrylivka	<p>The community is characterised as a tourist area and tourists come to the community during July and August. In 2019, 2 million came. Many of the community residents are also involved in agricultural activities.</p> <p>Key challenges for the community include a lack of a sewage system and local wastewater treatment facility, poor quality water supply, and a lack of sport facilities for children.</p> <p>There is a locally active NGO that is designed to focus on green environmental improvements, but this lacks funding and is not active.</p> <p>Local people use land within the project area for bee keeping, fishing and hunting.</p> <p>Local conflicts have occurred due to farmers using toxic pesticides which resulted in many bees of local farmers dying; this conflict was resolved using the regional administration.</p> <p>There is a local cultural heritage site in the form of a burial Hill close to the village Okhrimivka.</p> <p>There is a strong expectation that the project will recruit local people and local businesses such as hotels and camps.</p> <p>Negative impacts include hunting being stopped and impacts to birds during operation of the wind turbine.</p> <p>Overall, the majority of people in the meeting supported the wind farm development because this is a going to be a clean source of energy. However, local people are still concerned associated with potential impacts to road networks which are already in a poor condition.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
11 December 2019	Azov secondary school of I-III degrees of Kyrylivka rural council. NBT AS. Wood local consultant.	Kyrylivka	<p>All of the pupils attend the school on a regular basis and attendance does not change due to gender.</p> <p>The parents of the pupils have a responsible attitude and always send their children to school.</p> <p>A key challenge off the school is that the educational program does not match entirely the textbooks which they are provided with.</p> <p>Vulnerable people in the community include families with low income.</p> <p>Overall, the condition of the school has improved over the last 5 years.</p> <p>There is some concern amongst local people about the impacts from the flashing lights on top of the wind turbines. People located elsewhere in the region have said that the flashing lights of nearby wind farms already present can be annoying.</p>
11 December 2019	Business owner (apartments). NBT AS. Wood local consultant.	Kyrylivka	<p>The business owner has an apartment and hotel of up to 34 rooms. The business is very seasonal and is mostly active during the summer months.</p> <p>The main challenge of the business is a lack of a sewage system.</p> <p>The project is not expected to impact the business negatively and they remain happy about the project.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
17 December 2019	Women from farmer's households (7 people attending). NBT AS. Wood local consultant.	Kyrylivka	Women's skills include local cultural events and the completion of fitness classes. Employment opportunities are in general, provided equally to men and women. Women are interested in local job opportunities generated by the project. Vulnerable people in the community include retired people, families with low income, and families with many children. Positive impacts include the generation of employment opportunities for local people although it is expected that the majority of local opportunities will go to men. Overall there is support for the project as long as the tree lines are not impacted.

Date	Stakeholder/Attendees	Location	Key Discussions
10 December 2019	Farmers (8 people attending). NBT AS. Wood local consultant.	Kyrylivka	<p>All of the farmers attending the meeting have been resident in their community since birth and live typically 15 minutes from the house.</p> <p>The types of agricultural crops cultivated include crops and beans. Half of the agricultural land they have access to is irrigated.</p> <p>Key challenges include the increasing cost of equipment and pesticides. Problems with pests have become worse over the last 5 years due to the reduction in quality of the pesticides.</p> <p>People use the project land for other purposes including hunting, fishing and gardening.</p> <p>Negative impacts from the project could include the physical deterioration of public road networks. The developer should check that the turbines do not damage any underground water pipes. The wind turbines could also change bird migration routes and generate vibration electromagnetic diseases and other problems.</p> <p>Overall, the farmers were not supportive of the project because they believe there is no need for a wind turbine to be located in this area.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
19 December 2019	Community leaders (4 people attending). NBT AS. Wood local consultant.	Nove	<p>The community benefits from its location close to the regional centre of Metilipol.</p> <p>Key challenges for the community include poor quality piped water, a lack of sports facilities at schools and a lack of kindergartens.</p> <p>Local people use land in the vicinity of the project for hunting.</p> <p>Local farmers sometimes argue over land boundaries and these are solved through the land Commission.</p> <p>Vulnerable people include retired people.</p> <p>There is a potential for people to come towards the site during construction trying to find jobs.</p> <p>Negative impacts from the project include the damage of roads and removal of trees.</p> <p>Positive impacts include future investment into the community.</p> <p>Overall half the people supported the project and the other half did not.</p>
18 December 2019	Women from farmer's households (2 people attending). NBT AS. Wood local consultant.	Nove	<p>Women's local skills include needlework, fitness, and the operation are nearby operation of cultural centre.</p> <p>Women find it harder than men to find a job in the community.</p> <p>There is a local civil society active of Ukrainian women farmers.</p> <p>Typically, women have an equal voice with men in the household.</p> <p>There are cases of violence against women and 3 have been registered in the last 6 months.</p> <p>Negative project impacts are expected to include they deterioration in health. Positive impacts include investment and the generation of new job opportunities.</p> <p>Half of the people present supported the project and there is a strong expectation for future community development.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
12 December 2019	Community leaders (8 people attending). NBT AS. Wood local consultant.	Okhrimivka	<p>The community is located close to the Molochniy estuary and there are summer camps when the weather conditions are favourable.</p> <p>Young people typically leave the community and go elsewhere to find a job which means there are few local people in the local community.</p> <p>Key challenges for the local community include old water regional pipes leaking, poor quality of roads, lack of solid waste landfills and trees that are in poor condition.</p> <p>Land in the vicinity of the project is used for hunting and bee keeping.</p> <p>Occasional land use conflicts have occurred between different land users, including the use of toxic pesticides by some farmers that killed bees.</p> <p>A land boundary conflicts are resolved using the land Commission.</p> <p>People may decide to move towards the project during construction seeking jobs.</p> <p>Local people expect to be offered first the job opportunities.</p> <p>During operations local roads may become damaged.</p> <p>Positive impacts include local job creation and future investments into the community. There is a strong expectation for local investments and development.</p>
12 December 2019	Okhrimivska secondary school of I-III degrees. NBT AS. Wood local consultant.	Okhrimivka	<p>The percentage of children attending school on a regular basis is 100%.</p> <p>Parents support the school and all the children attend.</p> <p>All of the pupils go onto secondary school.</p> <p>Vulnerable people in local communities may include Yezidis who are from Armenia.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
12 December 2019	Women from farmer's households (9 people attending). NBT AS. Wood local consultant.	Okhrimivka	<p>Women's skills include fitness, choirs, needlework and art. Employment opportunities are available generally to men and women equally.</p> <p>Some families are vulnerable due to tensions and crime including burglary.</p> <p>There is violence against women in the local communities and there are very few sources of support.</p> <p>Negative impacts arising from the project include a deterioration of public roads and impacts on land required for the turbines.</p> <p>Positive impacts include the generation of employment opportunities which should be made available to women equally on the same salary.</p>
12 December 2019	Farmers (25 people attending). NBT AS. Wood local consultant.	Okhrimivka	<p>All of the farmers present during the meeting have been resident in their community from birth and most live 15 minutes drive from their land.</p> <p>70% of the people attending were individual land uses with the average area of land being 5.35 hectares.</p> <p>Crops grown include cereals and technical crops such as melons. Melons are transported from the field to the houses using their own machines.</p> <p>The incidence of pests has become worse due to a lack of quality pesticides.</p> <p>Land boundary conflicts have occurred between individual farmers.</p> <p>Other land uses in the vicinity include hunting and bee keeping.</p> <p>Negative impacts from the project include impacts to local road conditions and human health.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
18 December 2019	Community leaders (8 people attending)	Radyvonivka	<p>An important feature of this community is the proximity to Molochanskiy estuary as historically there have been many summer camps.</p> <p>Important local needs comprise improved local roads kindergartens employment opportunities and local sewage systems.</p> <p>Land in the vicinity of the project is used for hunting and bee keeping.</p> <p>Vulnerable people include people with disabilities and young people who are often unemployed.</p> <p>There is a potential for people across the region to travel to the site in search of employment.</p> <p>Negative project impacts include damage to roads and removing trees.</p> <p>Positive benefits from the project comprises investment and local jobs.</p>
18 December 2019	Women from farmer's households (5 people attending)	Radyvonivka	<p>Women's local skills include concerts needlework and fitness clubs.</p> <p>Women have more opportunities than men in social events men typically work in forestry and conduct hard physical work.</p> <p>Women are equally involved in family budgeting.</p> <p>The project could benefit women through offering local jobs.</p> <p>There is often violence against women in the community and 34 cases have been registered locally in the last few years. Women can approach local policemen for help but there is not much support available.</p> <p>The project could damage local roads but also generate job opportunities, although it is likely that the majority of the jobs will go to men and not women.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
17 December 2019	Community leaders (4 people attending)	Shelyhu	<p>The main and important feature of this community is the close proximity of Molochanskiy estuary and nature reserve area.</p> <p>In general, social conditions within the community are becoming worse as the productivity of agricultural land has declined. At the same time the tax level has increased, and tenant farmers cannot pay for their use of the land. Fuel prices have increased, and weather conditions are becoming poorer. Irrigating land is expensive.</p> <p>Key needs from the community include the regional water pipes, the rural gymnasium needs repair and the local school roof needs to be replaced.</p> <p>Vulnerable people include people who are retired those with disabilities and military veterans.</p> <p>There is a potential that people from outside of the local area seek work and move into the area.</p> <p>Negative benefits include damage to the roads and impact to bird life during operations.</p> <p>Positive impacts include the generation of jobs.</p>
17 December 2019	Municipal establishment of secondary school of I-III degrees in Shelyhu	Shelyhu	<p>All pupils at the school attend regularly.</p> <p>there has been a recent trend of young people moving towards the city and away from their community.</p> <p>The main challenge of the school is that it cannot provide food.</p> <p>Vulnerable people in the local community include single mothers and migrant workers.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
17 December 2019	Women from farmers' households (5 people attending)	Shelyhu	<p>Women's local schools includes needlework fitness dancers and choirs.</p> <p>Economic opportunities are available to men and women equally. Women are interested in job opportunities from the project.</p> <p>There is violence against women, but cases are generally not always registered.</p> <p>No negative impacts are expected from the project.</p> <p>Positive impacts include the generation of new job opportunities although it is expected that the majority of opportunities shall go to men.</p>
17 December 2019	Farmers (4 people attending)	Shelyhu	<p>All of the people present have been resident in their communities since birth.</p> <p>The farmers have created their own legal entity in the form of a collective.</p> <p>Cereals grown include technical crops and melons.</p> <p>Agricultural products are transported by least machines to grain elevators of Yakymivsliv district.</p> <p>Key agricultural challenges include a reduction in rain and a reduction in the effectiveness of herbicides.</p> <p>Farmers are concerned about the project due to the width of tree lines and the space needed to install a wind turbine, which they expect to damage the trees.</p> <p>Overall there is a lack of support to the project due to the need to impact the tree lines. However, if the developer were to invest in the project and local community then the support would increase.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
13 December 2019	Community leaders (8 people attending)	Yakymivka	<p>The community is the centre of the district and is characterised by large agricultural lands and forestry. The community is famous from the historical use of underground routes that connect them to nearby settlements.</p> <p>Social conditions within the community has become worse due to increased unemployment.</p> <p>Key challenges include the poor ecological condition of the estuary, the local wastewater treatment facility needs to be repaired, water supply pipes are in poor condition, and the provision of public external lighting is poor.</p> <p>Land in the vicinity of the project is used for hunting.</p> <p>Conflicts between land users have historically occurred due to boundary disputes between farmers.</p> <p>The Molochanskiy estuary attracts significant quantities of birds and this is a sensitive local area for nature.</p> <p>Vulnerable people in the community include people who are retired people who have disabilities and low income.</p> <p>There is a potential for people outside the local area to move towards the site seeking work.</p> <p>Negative impacts include a reduction of hunting grounds and changes to bird migration routes.</p> <p>Positive impacts include the generation of local job opportunities although it is expected that many of these will go to men and not women equally.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
12 December 2019	Secondary school N1 of I-III degrees	Yakymivka	<p>All of the children regularly attend school. Parents support the school and ensure their children go each day. Key challenges faced by the school comprise a lack of equipment and facilities for disabled children, the school yard is open and street dogs enter the playground. The school buildings are old and in need of repair. A new roof is required, and the security of the building is generally poor.</p>
13 December 2019	Yakymivska district organization of the Ukrainian community of hunters and fishers	Yakymivka	<p>The organisation is involved in coordinating the activities of hunters and fishermen. key objectives are to develop and promote hunting and fishing, to shoot predators, to breed wild animals and to protect the animals from illegal hunting. the organisation was established in 1921. they work closely with forestry and local ecological Authorities in Zaporizhya. play have 15 people at the office. key challenges include a reduction in hunting grounds and changes in bird migratory patterns. if the project were to proceed then they would need to change their hunting patterns. operation of the turbines may also result in a reduced amount of migratory birds.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
13 December 2019	Women from farmers' households (3 people attending)	Yakymivka	<p>Women's skills include sport and fitness clubs.</p> <p>Job opportunities are available equally to men and women.</p> <p>Women do not always have an equal voice in making decisions for household expenditure.</p> <p>People are vulnerable due to their low income and the fact that public transport is expensive.</p> <p>There is violence against women and women can approach the police for support.</p> <p>Negative impacts include the way in which the local roads may become damaged.</p> <p>Positive impacts include more job opportunities although it is likely that the majority will go to men more than women.</p>
13 December 2019	Farmers (4 people attending)	Yakymivka	<p>All of the farmers present at the meeting have been resident in their community since birth.</p> <p>All live a short distance from their land.</p> <p>Many are involved in a social association for farmers called the Cossack Grain Union.</p> <p>Cultivated crops include cereals and other technical crops.</p> <p>Recent key challenges include the incidence of rodents and pests.</p> <p>Land in the vicinity of the project is also used for hunting.</p> <p>Negative impacts arising from the project are expected to include damage to crops during harvest time.</p> <p>Positive impacts include the generation of new job opportunities and investment into the local and regional area.</p>

Date	Stakeholder/Attendees	Location	Key Discussions
May- June 2020 (exact dates to be completed)	Farmers and irrigation system owners (Istok LLC) (To be completed)	Kyiv	Items discussed included land acquisition and impacts on irrigation systems. (To be completed)
May- June 2020 (exact dates to be completed)	Farmers and irrigation system owners (Oriana Agro LLC) (To be completed)	Zaporizhya	Items discussed included land acquisition and impacts on irrigation systems. (To be completed)
5 June 2020	Regional Ecology department (5 people attending)	Zaporizhya	Items discussed included ESIA reports for Z1, Z2, Z3 and impacts to be included. (To be completed)
5 June 2020	Pryazovsky National Nature Park (5 people attending)	Melitopil	Items discussed included potential impacts due to OHL crossing at the North of the Park and mitigation measures to be included in the ESIA. (To be completed)
6-8 June 2020	Ornithologists (Raptors experts), Ukrecoconsult LLC (5 people attending)	Kyrylivka, Yakymivka, Project area	Items discussed included the important areas for birds species, arrangement of mitigation trials for Short-eared Owls and Montagu's Harrier. (To be completed)

Date	Stakeholder/Attendees	Location	Key Discussions
9 July 2020	Governor of Zaporizhya (To be completed)	Zaporizhya	Presentation of the Project to the new Governor of Zaporizhya. (To be completed)
23 July 2020	Road and construction authorities (To be completed)	Kyrylivka	Items discussed included access roads to WTGs for Z1, Z2, Z3 and roads extensions. (To be completed)
2018 –to date (exact dates to be completed)	Farmers, landowners (To be completed)	Yakymivka, Kyrylivka	Items discussed include presentation of the Project and land acquisitions. (To be completed)

7 Future Stakeholder Engagement

7.1 Disclosure of Information and Schedule

7.1.1 Disclosure during Baseline Data Gathering

During the ESIA process, information shall be shared with all stakeholders using culturally appropriate methods with the aim of working towards informed participation and meaningful two-way consultation.

The way in which project information is to be shared comprises the following:

- Verbal summaries during meetings and discussions (held in Ukrainian).
- Questions and answers during meetings and discussions (held in Ukrainian).
- A Project Information Leaflet (English and Ukrainian).
- A Grievance Mechanism Leaflet (English and Ukrainian).
- Public noticeboards at site entrance and within communities.

7.1.2 Disclosure of the ESIA

The Project Non-Technical Summary (NTS), ESIA, Environmental and Social Action Plan (ESAP) and SEP will be published on the Project's official website (<https://www.nbtas.no/>) in Ukrainian and in English. The National EIA has been published on the Ministry of Ecology's official website in accordance with national requirements^{2 3 4}.

NBT AS shall also provide translations of documents or document sections into minority languages spoken in parts of the Project affected area, i.e. Russian, if such requests are received. At a minimum, the NTS will also be published in Russian.

NBT AS with the assistance of local municipal authorities and local community councils will ensure that the local population, particularly residents and businesses living or operating in the vicinity of the Project or using land which may be affected are informed about the Project.

² Zophia 1 <http://eia.menr.gov.ua/uk/case/id-5694>

³ Zophia 2 <http://eia.menr.gov.ua/uk/case/id-5696>

⁴ Zophia 3 <http://eia.menr.gov.ua/uk/case/id-5695>

7.1.3 Timetable

Based upon the current ESIA schedule the timetable for disclosure is summarised below:

- Disclosure of the ESIA = **TBC 2020**

7.2 Future Consultation Activities

Future consultation events will be held to ensure Project information is disseminated to the community.

The Project Community Liaison Officer (CLO) will hold consultation meetings prior to construction and regular (monthly) consultation meetings during construction, to keep local communities up to date with Project progress and assist with grievance procedures, etc. The CLO will also provide training for staff responsible for implementing the SEP. The CLO will have Ukrainian, Russian and English language capability to ensure there are no barriers to communication with the Project team and local community.

Regular consultation will be undertaken with the farming community regarding potential impacts to their livelihoods.

7.3 Other Engagement Activities

Stakeholders will be engaged throughout the implementation process for consultation, information dissemination and grievance management. There will be continuous sharing of Project information with community leaders in order for stakeholders to be informed about construction activities and progress, to minimize grievances, and to manage expectations.

7.4 Methods of Communication

The methods of communication to be utilised by NBT AS will include:

- Publication for public review of the ESIA, SEP, NTS, ESMP and ESAP.
- Meetings with regulatory bodies.
- Public meetings.
- Published updates on local council website.
- Announcements in local media.
- Provision of general information on notice-boards at key public locations.
- Disclosure of monitoring reports.

7.5 Stakeholder Engagement Programme

The Project stakeholder engagement programme is presented below. This will be reviewed and updated as the Project progresses.

Zophia Wind Farm

Table 7-1: Construction Stakeholder Engagement Programme

Activity/Project	Project Timescales	Issues to be Discussed and Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
Provision of Project information	Prior to Construction. During Construction on an ongoing basis	Information board to be installed at: <ul style="list-style-type: none"> • Project site entrance. Boards to provide information on: company name, grievance mechanism, key activities and schedule, mitigation measures associated with the management of workers behaviour in accordance with the Accommodation Management Plan, Worker Code of Conduct, land access restrictions during construction and content of the Community Health Safety Management Plan, operational capacity of the wind farm once installed, future annual environmental and social performance reporting.	Information boards (Ukrainian).	<ul style="list-style-type: none"> • Information is publicly available to all stakeholder groups
Public Consultation Meetings	Prior to Construction. During Construction every month	<ul style="list-style-type: none"> • Update on project progress (schedule and key activities) • Key environmental and social management measures. • Land access restrictions for agricultural and cultural heritage receptors. • Local workforce accommodation arrangements. 	Posters indicating key management measures and grievance mechanism (Ukrainian).	<ul style="list-style-type: none"> • All stakeholder groups are invited to attend, including village council representatives, local community groups and charitable organizations

Activity/Project	Project Timescales	Issues to be Discussed and Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
		<ul style="list-style-type: none"> Grievance mechanism. Prohibition of open fires within the project area. Cultural awareness of the incoming workforce. 		
Meetings with Farmers and land owners / land users (every two months)	During Construction every two months	<ul style="list-style-type: none"> Update on project progress (schedule and key activities including road transport concerns, worker off-site accommodation and their behaviour, plus other key topics) Details of construction work. Any land access restrictions. Grievance mechanism. 	Posters including project land access restrictions (Ukrainian).	<ul style="list-style-type: none"> Land owners / users. Local farming community representatives.
Bi-monthly Environment and Social Committee Meetings.	During Construction every two months	<ul style="list-style-type: none"> Update on project progress (schedule and key activities including road transport concerns, worker off-site accommodation and their behaviour, plus other key topics) Ongoing management of key environmental and social issues. Perceptions towards the project. Review of grievances recorded since the last meeting and status of all outstanding concerns. Any other business. 	Public meeting.	<ul style="list-style-type: none"> Regional government representatives Village Council representatives.

Activity/Project	Project Timescales	Issues to be Discussed and Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
Annual Environmental and Social Reporting	During Construction annually	A summary of the yearly environmental and social performance of the project to cover the following topic areas (plus others): local employment, local procurement, bat surveys, waste management, training, workforce management measures, water consumption, road traffic movements and management measures.	Annual Environmental and Social Performance Report (Ukrainian and English)	<ul style="list-style-type: none"> Publicly available to all stakeholder groups
Annual Public Consultation Meetings	During Operations	<ul style="list-style-type: none"> Update on project energy generation Key environmental and social management measures in place during operations. Grievance mechanism. Key findings from environmental surveys undertaken. 	<p>Public meeting.</p> <p>Posters indicating key management measures and grievance mechanism (Ukrainian).</p>	<ul style="list-style-type: none"> All stakeholder groups are invited to attend, including village council representatives, local community groups and charitable organizations
Annual Environmental and Social Reporting	During Operation annually	A summary of the yearly environmental and social performance of the project to cover the following topic areas (plus others): power generated, local employment and procurement, and the key findings of environmental surveys undertaken.	Annual Environmental and Social Performance Report (Ukrainian and English)	<ul style="list-style-type: none"> Publicly available to all stakeholder groups

8 Monitoring and Reporting

Through communication channels such as the presentation of announcements at local community buildings, media and periodic meetings as listed above, NBT AS will monitor and provide feedback as appropriate.

For public consultation meetings or public exhibitions, NBT AS will use an open book (with pens provided) for recording questions and comments anonymously. A form will be provided for people to record complaints and grievances. These will be present in an obvious area of the exhibition however the area will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by NBT AS so that a response and feedback can be made to stakeholders.

The results of public consultation and project information disclosure (together with the grievance procedure) will be reported throughout the construction period as part of NBT AS's environmental and social monitoring and reporting requirements. The reports must include attendance, purpose of meeting, and comments and decisions made.

8.1 Review of the SEP during the Construction Phase

Stakeholder engagement during the construction phase will relate to all activities leading up to and during the physical construction of the Project infrastructure, as well as the management of contractors and construction contracts. Engagement with stakeholders during construction is primarily about involving stakeholders in assessing whether previously identified mitigation measures are working as intended, being responsive to grievances and identifying alternatives where there are failings.

Table 8-1 describes the monitoring Key Performance Indicators (KPIs) that shall be used during the construction phase.

Table 8-1: Construction Phase Monitoring KPIs

Topic area	Monitoring KPIs
Provision of Project information	Number of working days the project office is available and open, per month.
Monthly Public Consultation Meetings	Number of monthly public consultation meetings held as planned, per year. Number of people attending each monthly public consultation meeting, broken down by gender. Number of actions for NBT AS recorded at each monthly

Topic area	Monitoring KPIs
	<p>meeting.</p> <p>Number of actions for NBT AS addressed that were raised at previous monthly meetings.</p>
Bi-monthly Meetings with Farmers and land owners / land users (every two months)	<p>Number of bi-monthly meetings with farmers and land owners/users held as planned, per year.</p> <p>Number of people attending each, broken down by gender.</p>
Environment and Social Committee Meetings.	<p>Number of annual meetings held, per year (target is 1/year).</p> <p>Number of people attending each meeting.</p>
Annual Environmental and Social Reporting	<p>Release of an annual environmental and social report to stakeholders (target is 1/year).</p> <p>Number of comments/responses following issuance of the annual environmental and social report.</p> <p>Number of subsequent responses to comments on the annual report.</p>
Grievance mechanism	<p>Number of grievances raised per month.</p> <p>Number of grievances outstanding at the end of each month.</p> <p>Number of grievances where a written acknowledgment was provided within five working days.</p> <p>Number of grievances resolved within the 15 working day target.</p>

9 Grievance Mechanism

9.1 Overview

Wood, on behalf of NBT AS, has developed a community grievance mechanism for the Project in accordance with IFC's Performance Standards and Guidance Notes which present various principles and good practice measures on grievance mechanisms. These include:

- Establish a procedure for receiving, recording or documenting and addressing complaints that is easily accessible, culturally appropriate, and understandable to affected communities.
- Inform the affected communities about the mechanism during the company/community engagement process.
- Consider when and how to seek solutions to complaints in a collaborative manner with the involvement of the affected community.
- Address concerns promptly, using an understandable and transparent process that is readily accessible to all segments of the affected communities—and at no cost and without retribution.
- Ensure full participation of both genders and vulnerable groups.
- Take into consideration customary and traditional methods of dispute resolution when designing the system.
- Assign consistent, experienced, and qualified personnel within the company with responsibility for receiving and responding to grievances.
- Establish a redress mechanism so those who feel their grievances have not been adequately addressed have recourse to an external body for reconsideration of their case.
- Document grievances received, and responses provided, and report back to the community periodically.
- Provide periodic reports on issues that the grievance mechanism has identified as of concern to those communities.

The Performance Standards and Guidance Notes emphasize that a grievance mechanism should help NBT AS understand the community's perception of project risks and impacts so as to adjust its measures and actions to address the community concerns.

The Grievance Mechanism has also been designed with reference to the EBRD PRs, particularly PR 10 which requires that:

- The grievance mechanism process or procedures should address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all segments of the affected communities, at no cost and without retribution. The mechanism, process or procedure must not prevent access to judicial or administrative remedies. The client will inform the affected communities about the grievance process in the course of its community engagement activities, and report regularly to the public on its implementation, protecting the privacy of affected individuals.
- Handling of grievances should be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the stakeholders' needs and concerns. The mechanism should also allow for anonymous complaints to be raised and addressed.

The objective of NBT AS's grievance procedure is to ensure that all comments and complaints from people directly affected by the Project, including local communities, farmers and their families are processed and considered in an appropriate way. Furthermore, the grievance mechanism should contain the corrective actions needed to be implemented in relation to complaints received with guarantees that the complainant is being informed of the outcome. The means by which stakeholders may make comments and complaints must be appropriate to their culture. The flowchart shown in Figure 9-1 below illustrates a general mechanism of processing the complaints.

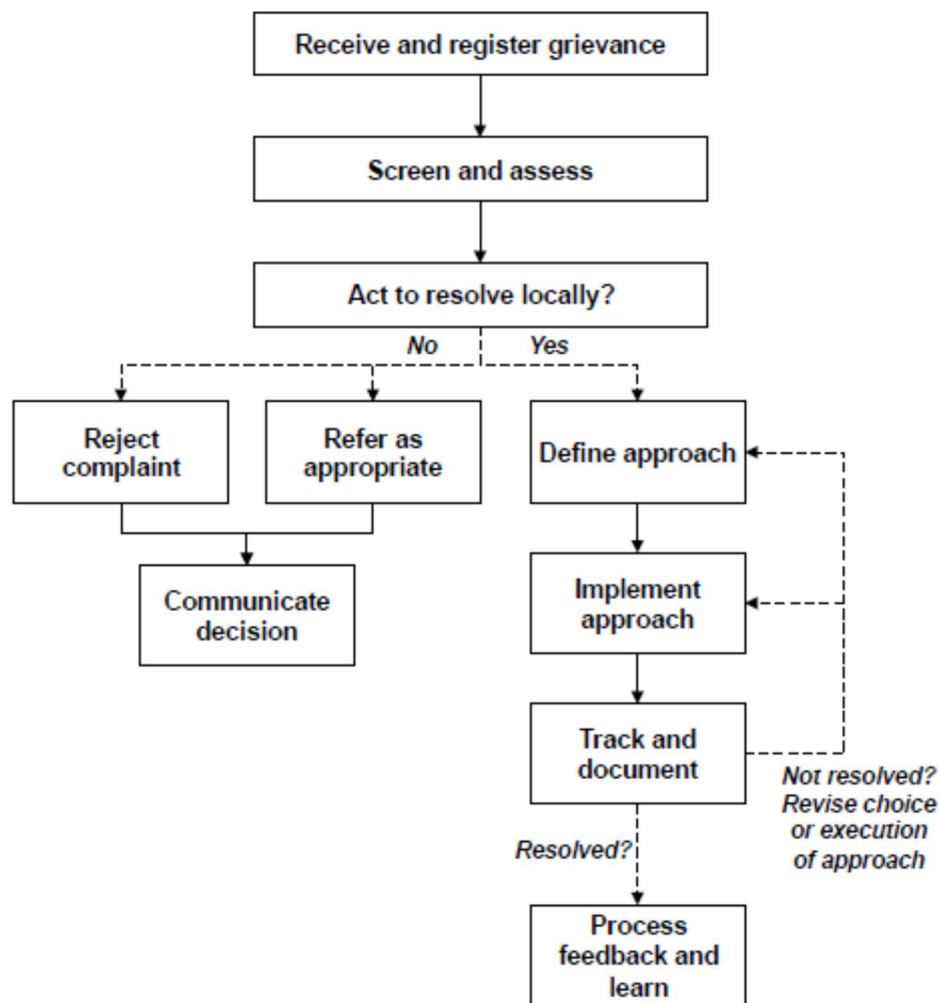


Figure 9-1: Grievance Mechanism Flowchart

9.2 Examples of Grievances Typically Encountered

The following table provides examples of the types of grievances that are typically encountered on a major construction project such as this.

Table 9-1: Examples of Grievances

Type of Grievance	Complainant(s)	Example
Relatively minor and onetime problems related to company operations.	An individual or family.	A company truck damaging a community member's fence; a one-time disrespectful encounter between a company employee and a community member.

Type of Grievance	Complainant(s)	Example
Relatively minor but repetitive problems related to company operations.	An individual or family or small group of people.	Livestock getting loose because company employees fail to close gates.
Relatively minor but repetitive and widespread problems.	Multiple individuals, families, or larger groups.	Company-related road traffic raising dust that settles on clothes hung out to dry.
Significant and larger repetitive problems.	Community groups, non-governmental or community-based organizations, or local governments.	Company blasting allegedly causing structural and/or aesthetic damage to building.
Major claims that company activities have resulted in significant adverse impacts on larger populations of people.	Community groups, non-governmental or community-based organizations, or local governments.	Company operations adversely impacting a community's water supply, making it unsafe for drinking, livestock, and/or irrigation. Off-site worker conduct adversely impacting on a local community safety and security.
Major claims over policy or procedural issues.	Non-governmental organizations, community groups or community-based organizations, or local governments.	A company's non-compliance with its own policies; failure to follow guidelines of multilateral lenders for adequate consultation to achieve prior and informed consent; inadequate resettlement and compensation of affected populations.

9.3 Community Expectations

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem.
- An honest response to questions about company activities.
- An apology.
- Compensation.
- Modification of the conduct that caused the grievance.

- Some other fair remedy.

In voicing their concerns, they also expect to be heard and taken seriously. Finally, NBT AS, contractors, or government officials must convince people that they can voice grievances and work to resolve them without retaliation.

9.4 NBT AS Grievance Resolution Mechanism

Local people need a trusted way to voice and resolve concerns linked to a project's operations. A locally-based grievance resolution mechanism provides a promising avenue by offering a reliable structure and set of approaches where local people and the company can find effective solutions together. NBT AS has developed and implemented a grievance mechanism which:

- Increases the likelihood that small disputes can be brought to a conclusion relatively quickly before they become deep-seated grievances.
- Keeps ownership of the dispute in the hands of local people.
- Offers an early, efficient, and less costly way to address concerns.
- Promotes a more stable business climate for companies that reduces risk and enhances accountability to the host community.

A successful grievance mechanism helps achieve the following goals:

- Open channels for effective communication.
- Demonstrate that a company is concerned about community members and their well-being.
- Mitigate or prevent adverse impacts on communities caused by company operations.
- Improve trust and respect.
- Provide structures for raising, addressing, and resolving issues that reduce imbalances in power.
- Promote productive relationships.
- Build community acceptance of a company's "social license" to operate.

At all times, NBT AS will accept comments and complaints concerning the Project in both verbal and written formats. A template Grievance Form is provided in Appendix A.

The key aspects of NBT AS grievance mechanism are described below:

9.4.1 Responsibilities

Any person or organisation may send comments and/or complaints in person or via post, email, or facsimile using the following contact information. The NBT AS Social Manager should oversee the implementation of the grievance mechanism with support from the CLO.

Table 9-2 Responsible Persons and Contact Details

NBT AS E&S Manager Nataliia Nauchu Tel: +380503037349 Email: es@nbtas.no CLO Vlad Kazak E-mail : vlad.kazak@nbtas.no	EPC TBC Tel: Email:
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In addition to the above contact details, a mailbox will be provided at the site entrance to allow local people to raise grievances in a more informal way.

9.4.2 On Receiving a Grievance

The comments and complaints will be summarised and listed in a Complaints/Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant. Following a grievance being recorded, NBT AS will acknowledge the grievance, in writing, within a period of up to five working days and state that this is now being investigated in accordance with the grievance mechanism.

9.4.3 Assessing the Grievance

During the assessment, the team shall gather information about the case and key issues and concerns and helps determine whether and how the complaint might be resolved.

NBT AS will:

- Determine who will conduct the assessment. Typically, the complaints coordinator performs this task or directs it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a company member to engage directly with the complainants to gain a first-hand understanding of the nature of the complaint.
- Clarify the parties, issues, views, and options involved:
 - Identify the parties involved.
 - Clarify issues and concerns raised by the complaint.
 - Gather views of other stakeholders, including those in the company.
 - Determine initial options that parties have considered and explore various approaches for settlement.
- Classify the complaint in terms of its seriousness (high, medium, or low). Seriousness includes the potential to impact both the company and the community.

Issues to consider include the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue. A complaint's seriousness is linked to who in the company needs to know about it and whether senior management is advised.

Rather than resorting to a purely unilateral "investigate, decide, and announce" strategy, engage more directly with the complainant in the assessment process, and involve the complainant in influencing the resolution process to be selected, and settlement options.

9.4.4 Formulation a Response

The system for responding to the complainant should specify who communicates and how.

In some cases, it may be appropriate that feedback be provided by the staff member responsible for assessment accompanied by the coordinator of the complaint's procedure.

The site manager may participate in feedback, depending upon the seriousness of the complaint.

When formulating a response NBT AS will ensure that:

- The complaint coordinator or relevant department may prepare the response. The response should consider the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.
- To present and discuss the response to the complainant, consider holding a meeting with the complaint coordinator, relevant company manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator. The group would also discuss appropriate next steps during this meeting. If the proposal is a settlement offer and it is accepted, the complaint is resolved successfully and there is no need to proceed to the next step of selecting a resolution approach. If the complainant is not happy with the response about a resolution process or substance, the group should try to reach an agreement that would be mutually acceptable.

All comments and complaints will be responded either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

NBT AS will respond to the complaint within a period of up to fifteen working days with a proposed resolution to the grievance. If the proposed resolution cannot be sent to the complainant within this time for any reason, then NBT AS will inform the complainant about the reason for the delay and indicate a target date as to when a proposed resolution will be submitted to them.

9.4.5 Track and Monitor Grievances

Grievances need to be tracked and monitored as they proceed through the system. Effective tracking and documentation accomplishes several goals:

- Document the severity of a complaint (high, medium, low) according to specific criteria. The level of severity guides requirements for alerting senior management and determines the seniority of management oversight needed.
- Provide assurance that a specific person is responsible for overseeing each grievance—from receipt and registration to implementation.

- Promote timely resolution according to the time periods specified in the SEP.
- Inform all concerned (the complainant and appropriate company personnel) about the status of the case and progress being made toward resolution.
- Document the company's response and outcome(s) to promote fairness and consistency.
- Record stakeholders' response(s) and whether additional research or consultation is needed.
- Provide a record of settlements and helps develop standards and criteria for use in the resolution of comparable issues in the future.
- Monitor the implementation of any settlement to ensure that it is timely and comprehensive.
- Provide data needed for quality control measures, to assess the effectiveness of the process and action(s) to resolve complaints.
- Identify learning from specific cases to be used later to assess the effectiveness of the mechanism or address systemic issues that may require changes in company policies or performance.

In order to ensure that grievances are tracked and documented NBT AS has provided for the following:

- Tracking forms and procedures for gathering information from company personnel and complainant(s).
- Dedicated staff to routinely update the database of grievances.
- Periodically review information so as to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled by the company, and periodically evaluate the overall functioning of the mechanism.
- Processes for informing stakeholders about the status of a case (such as written status reports).
- Procedures for provision of regular reporting of grievances and resolutions.

9.4.6 Grievances Received to Date

Table 9-3: Grievances Received to Date

Date	Grievance	Raised By	Action Taken

Appendix A Grievance Form

I, (full name)	
Resident at:	
Tel:	Fax:
E-mail:	
Wish to raise the following complaint or concern (include location and duration of problem):	
Suggestions to solve problem:	
Preferred method of communication (verbal, written, other):	
Signed:	Date: