



STAKEHOLDER ENGAGEMENT PLAN (SEP)

KARAVASTA 140 MW SOLAR PV
PROJECT, ALBANIA



RESPONSIBILITIES

	DATE	NAME	FUNCTION
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APPROVAL	22.02.2022	Ghislain Fourastie	EPC Project Manager

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03	10.06.2022	Nicolas Bergeret	Update to include ESIA public disclosure process
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05	12.08.2022	Rematlen Bollobani	Update following LRP update
06	25.08.2022	Elvan Muca	Aligned with ESIA

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INTRODUCTION

Purpose of the Stakeholder Engagement Plan

The overall aim of this SEP is to ensure that a consistent, comprehensive, coordinated and culturally appropriate approach is taken to stakeholder engagement and Project disclosure throughout the different stages of the Project. It is further intended to demonstrate the commitment of the Company to an 'international best practice' approach to engagement. Voltage has committed to full compliance with all Albanian EIA Regulations, as well as aligning to the international standards of the EBRD and IFC Performance Standards and Requirements (PR), and any other directly relevant international best practice policies.

The scope of the SEP is to plan and design the stakeholder engagement process during the project. This SEP is considered a "live document" and will be updated periodically according to project phases to reflect the engagement, that have been undertaken and to plan the upcoming events. Currently the SEP focuses on the pre-construction and construction activities. It will be updated on a quarterly basis during construction to reflect the progress of construction activities. The SEP will be updated prior to commissioning to describe in more details the stakeholder engagement activities to be implemented during operation and prior to the plant decommissioning. These activities are not described in this SEP yet. The SEP will be updated at least three months before the start of operation to present in details SE activities over that project phase.

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The main goals are to ensure and build a two-way communication process between Voltage and its key stakeholders, to help ensure that impacts are identified and assessed, to enable appropriate mitigation and enhancement measures to be identified with due consideration of feedback and active input from relevant stakeholders. The key objectives of this SEP can be summarized as follows:

- **Ensure understanding.** An open, inclusive and transparent process of culturally appropriate engagement and communication will be undertaken to ensure that stakeholders are well informed about the Project. Information will be disclosed as early and as comprehensively as possible to ensure stakeholders understand of the potentially significant E&S impacts of the Project.
- **Involve stakeholders.** Identification, mapping and categorisation of stakeholders taking into consideration the level of impact of the project and the influence of these stakeholders on the project and its activities;
- **Build relationships.** Through supporting open dialogue, engagement can help to establish and maintain a social licence to operate.
- **Manage expectations.** It is important to ensure that the Project does not create or allow unrealistic expectations of Project benefits amongst local communities. The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, by disseminating accurate information in an accessible way.

Content and structure of the SEP

This Stakeholder Engagement Plan (SEP) presents the engagement plan at all stages of the project :

- Development phase (studies and reports)
- Mobilization / Pre-construction
- Construction and Installation
- Operation & Maintenance
- Decommissioning or Extension

Stakeholder engagement plan is prepared based on the Environmental and Social Impact Assessment (ESIA) and Livelihood Restoration Plan (LRP) process. Next process of stakeholder engagement will be based on results of these reports. Valtalia has obligation to implement this SEP and to review it periodically. When needed, part of stakeholder engagement can be implemented by consultants such as ESIA or LRP consultants.

Valtalia has developed a separate Stakeholder Engagement Report (SER) which describes and logs all the engagement that has been conducted for the project as part of the ESIA regulatory approval process. It also includes the findings, comments and a summary of the feedback received; the SER will be updated periodically to ensure all communication with stakeholders is logged and tracked.

The following SEP is structured in 10 sections:

- Section 1: Introduction
- Section 2: Project Description
- Section 3: Regulations and Requirements for Stakeholder Engagement
- Section 4: Stakeholder Engagement Methodology
- Section 5: Stakeholder Identification and Mapping
- Section 6: Stakeholder Engagement Up to Date
- Section 7: Stakeholder Engagement during project lifecycle
- Section 8: Grievance Mechanism
- Section 9: Monitoring and Reporting
- Section 10: Annexes

PROJECT DESCRIPTION

Project Location and Surrounding Area

The Karavasta Project consists of a 140 MW Solar PV Plant (Plant Site) and associated 220 kV Overhead Transmission Line (OHL).

The proposed Project is located at Remas administrative unit, municipality of Divjake and Libofsha administrative unit, municipality of Fier, Albania and lies approximately 5 km south of the Karavasta Lagoon. The available land for the PV Project consists of 196 Ha of State land, with the proposed PV layout footprint occupying a total area of 185 Ha.

The Project site and 220kv OHL Route is located near the following communities

Village	Project component
Ndërmenas, Hasturkas, Karavasta e Re, Adriatik	PV plant
Adriatik, Seman i Ri, Seman, Sulaj, Dërmenas, Radostinë, Zhupan, Vadhiz, Çlirim, Peshtan i Vogël, Drizë	OHL

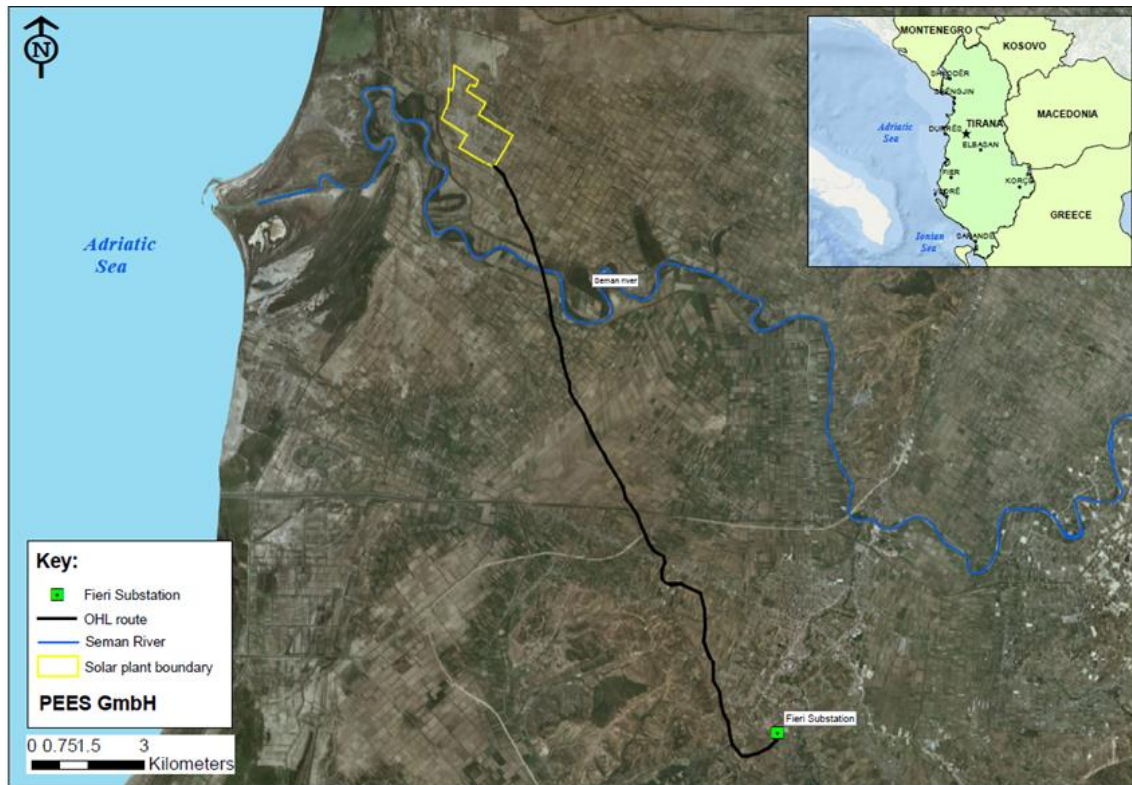


FIGURE 1: PV Site and OHL

Technical overview

Voltalia has considered a number of possible designs and layouts for the Plant. The Project is designed as a 140 MWp (DC) horizontal single-axis tracking photovoltaic (PV) park and will deliver 110 MW (AC) to the grid.

Figure 3 gives an overview of a utility scale grid-connected solar PV power plant; the main components include:

- **Solar PV modules:**
- **Module tracking systems:**
- **Inverters:**
- **Step-up transformers:**
- **The grid connection interface:**

The Project will also require a building to accommodate the SCADA (Supervisory Control and Data Acquisition) equipment for the command, control and protection of the Project. This will be manned by the technicians employed for the control, operation and maintenance of the Project. In addition to the above key components a large-scale solar PV project also requires the following infrastructure:

- Onsite (buried) cabling;
- Fencing and security measures;
- Access tracks;
- Material storage facilities.

During the construction phase, one or more temporary construction compound(s), including site offices, material and equipment storage etc., will be required as well as temporary roadways to facilitate access to all parts of the Development site.

The Project also requires a 220 kV overhead transmission line (OHL) to connect the Project to the National grid. This will be achieved via 19.2 km OHL connecting the Project to the substation located in the suburban area of the city of Fier;

The Project can be divided into four key phases as follows:

- Mobilization / Pre-construction: including site preparation, and mobilization of equipment and materials to site
- Construction and Installation: including civil works, electrical works, and equipment installation
- Operation & Maintenance: Plant operation and routine maintenance
- Decommissioning or Extension: Dismantling of equipment and associated facilities and site restoration, or lifespan extension through renewal of components.

Social context

The ESIA study Area extends into the Fier district which is located in south-western Albania. The project intersects the territories of the Fier and Divjakë municipality.

The PV Project will be developed in the territories of Libofsha and Remas while the OHL will intersect the territories of Libofsha, Topoje, Qendër and Dërmënas, Levan Administrative Units (AU). The table below shows the administrative organization and the villages whose territories are intersected by the project. I

TABLE 1: ADMINISTRATIVE ORGANIZATION OF AREA INTERSECTED BY THE PROJECT

No	Municipality	Administrative Unit	Village	Affected By/Nearby to	Residents
1	Fier	Libofshe	Ndërmenas, Hastukas, Adriatik	PV plant and OHL	6149
2		Topoje	Seman i Ri, Seman,	OHL	4246
3		Dërmënas	Dërmënas, Radostinë, Sulaj.	OHL	7788
4		Qendër	Zhupan, Vadhiz, Çlirim, Drize	OHL	4207
5		Levan	Peshtani i Vogel	OHL	8159
6	Divjakë	Remas	Karavasta e Re	PV plant, OHL	4449
Total residents					34998

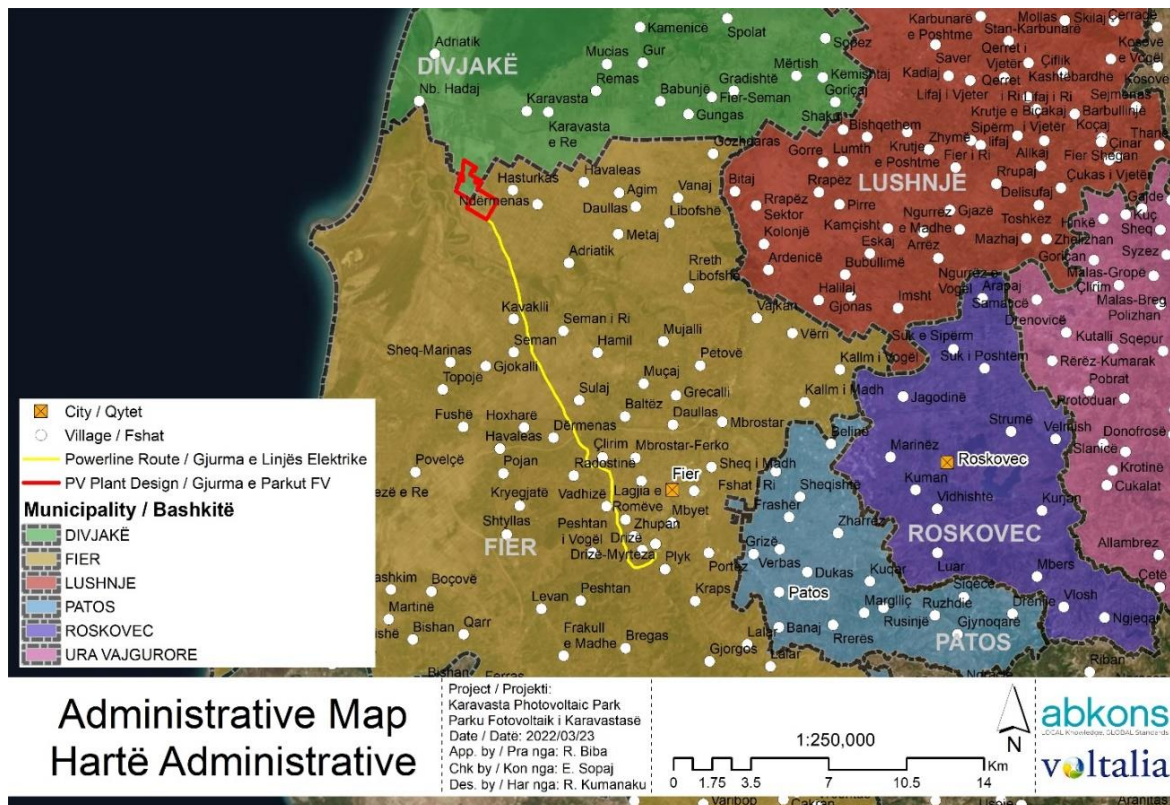


FIGURE 2: ADMINISTRATIVE ORGANIZATION OF AREA INTERSECTED BY THE PROJECT

The municipality of Fier includes the most important agricultural areas of the country, as well as a significant part of the industry related to oil refining. More than half of the population of the municipality live in rural areas, which shows the importance of the agricultural sector in the economic life of the municipality. The agricultural production of this area is diverse from cereals to vegetables, melons, livestock and its by-products. The municipality has a considerable coastline that stretches from the Vjosa River to the Seman River estuary at the borders of the Divjaka-Karavasta National Park. Also, an important touristic attraction is the Archaeological Park of Apollonia, along with other cultural heritage sites.

The municipality of Divjaka consists almost entirely of rural areas. The municipality is located in a completely rural and fertile area, while part of the territory of this municipality is the national park Divjaka- Karavasta, as well as the beach of Divjaka. Agriculture is the main economic activity and to a lesser extent fishing in the Karavasta lagoon.

REGULATION AND REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

Introduction

This section provides an overview of the legal and regulatory framework in Albania and the requirements of the international lenders for the Project. This Section presents the relevant standards and legislation identifying the key national and international requirements for engagement. The focus of this Section is only on legislation that relates directly to public participation requirements.

International Standards emphasise the importance of identifying key stakeholders and ensuring engagement planning, consultation and disclosure of Project information is undertaken in a timely,

relevant, and understandable fashion. Information must be accessible to everyone, including any segments of the population who might be considered vulnerable or marginalized. It encourages Project proponents to use engagement methods that are culturally appropriate, and free of manipulation, interference, coercion, and intimidation. Albania has ratified several regulations relevant to access to information and community participation in decision-making.

National Legal Framework

According to the Albanian legislation, the social impact assessment, jointly with the scoping phase, is not actually considered mandatory. The law only considers the Environmental Impact Assessment (EIA), as mandatory for the Public Information and Consultation.

The list of adopted legal acts that transpose EU horizontal legislation includes:

- DCM No. 247, dated 30.04.2014, “On the determination of rules, requirements and procedures for public information and involvement at the environmental decision-making process”;
- DCM No. 16 dated 14.01.2012 “On Public Access to Environmental Information”;
- Law No. 119/2014 of 18.09.2014 “On the Right of Information”;
- Law No. 146/2014 of 30.10.2014 “On Public Informing and Consultation”;
- DCM No. 994, dated 02.07.2008 “On public involvement in environmental decision making”; Ministerial Guideline No.1, dated 03.03.2009”, On responsibilities of the environmental bodies to ensure the participation of the public and environmental NGO to the EIA process”.

A major part of any ESIA process is to solicit views, opinions and concerns on the proposed activities from various stakeholders, including representatives of local communities, interest groups, non-governmental organizations (NGOs), government agencies and any other stakeholder relevant to the proposed activities.

Public access to and participation in environmental decision-making is sanctioned in Albanian legal and institutional frameworks, particularly by Law No. 8672/2000 (from 26/10/2000), “On Albania’s Adherence to the Aarhus Convention”. The mechanism and importance of public consultation are also established under Chapter III of Law No. 10440/2011, which requires a comprehensive consultation during the EIA for the projects listed in its annexes

Decision No. 247, dated 30.04.2014, “On rules, request and procedures for informing and involving the public in environmental decision making” relates to the disclosure of information during the EIA procedure. This includes access to information and consultation and public hearings in order to raise awareness of the public about the potential impacts of the project on the environment during the drafting stage of the EIA. Interested parties have the right to appeal against acts, actions or omissions during the full EIA process and disclosure.

Lenders’ Requirements

In addition to the Albania requirements, the SEP is also designed to align with international good practice, in particular the EBRDs Performance Requirements (PR10) and IFC Performance Standard 1. Where applicable, the most stringent standards will be followed.

Lenders require their clients to engage with affected communities through disclosure of information, consultation, and informed participation, in a manner proportionate with the risks to and impacts on the affected communities. PR10 and PS1 discusses the main requirements for consultation and disclosure for the assessment and management of environmental and social risks and impacts.

Lenders consider public consultation and stakeholder engagement as an on-going process, to be started at the earliest stage of Project planning, and to be continued throughout the entire life of the project.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project[1]specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

STAKEHOLDER ENGAGEMENT UP TO DATE

This section presents the stakeholder engagement activities that took place between September 2020 up to the last revision of this SEP in June 2022, including the context and the method of engagement, the information presented to stakeholders and their feedback. Details and minutes of meetings are presented in annex to this document.

Stakeholder engagement activities to date were carried out as part of the ESIA process, to Albanian standards and Lenders' standards, and land acquisition and livelihood restoration process.

ESIA related Stakeholder engagement activities

ESIA related stakeholder engagement activities have been carried out in line with Albanian regulations which consisted mainly of the scoping phase consultation including the disclosure of the scoping report on the 14th of January and the project public hearing held on the 30th of March 2021. In addition to these formal requirements, additional stakeholder engagement activities have been carried out as part of the social baseline data collection exercise. These activities are presented in more detail from section 4.1.1 to 4.1.5

The project acknowledges the discrepancy between Albanian regulations and Lenders' public disclosure and stakeholder engagement requirements. Further stakeholder engagement activities are planned to disclose the findings of the ESIA to stakeholders and include their feedback in the ESIA report. These planned activities are presented in section 7.

Initial consultation meetings (Scoping Phase)

Between the 21st – 25th September a total of 16 separate meetings with the participation of 53 officials have been carried out with national, regional and local authorities. Engagement with local communities was conducted in October through ad hoc meetings with more than 30 community members in the villages of Ndërnenas and Hasturkas. While the communities living along the transmission line route were engaged in February after the confirmation of the route alignment. The scoping meetings served to provide stakeholders with information about the Project and the ESIA process and to obtain feedback from these stakeholders on their key concerns and issues. The objective is to identify any key concerns or high-level issues that the stakeholders had at this early stage.

The consultation meetings included PowerPoint presentations on an introduction to the Project elements, an overview of the ESIA process, methodology of baseline study and areas of influence, and assessment methodology of environmental and social issues. The consultation meetings also included an open forum for discussions and questions from participants. The discussions and comments raised were recorded along with meeting minutes and the attendance register. The outcomes of the meetings are included in the Scoping Report.

TABLE 2: STAKEHOLDER ENGAGEMENT – SCOPING MEETING SCHEDULES

Identified Stakeholders	Meeting Date
Ministry of Tourism and Environment (MTE)	21-Sep-20
Ministry of Infrastructure and Energy (MEI)	23-Sep-20
Ministry of Agriculture and Rural Development (MARD)	22-Sep-20
Ministry of Culture	22-Sep-20
National Environment Agency (NEA)	23-Sep-20
National Territorial Planning Agency (NTPA)	21-Sep-20
National Agency for the Protected Areas (NAPA)	21-Sep-20
National Agency of Natural Resources	23-Sep-20
National Institute of Cultural Heritage - Ministry of Culture	22-Sep-20
Transmission System Operator (OST)	23-Sep-20
Regional Directory of Environment, Fier Region	24-Sep-20
Drainage Board	24-Sep-20
Prefecture of Fier Region	24-Sep-20
Regional Council of Fier	24-Sep-20
Fier Municipality (Technical Directories of the Fier Municipality)	24-Sep-20
Libofshe Administrative Unit, Municipality of Fier	24-Sep-20
Local community at the ESIA study area (Hasturkas, Ndërnenas,)	29-Oct-20
Regional Agency for the Protected Areas (RAPA)	25-Sep-20
Municipality of Divjake (Technical Directories of the Divjake Municipality)	25-Sep-20
NGOs (AOS, ILIRIA, PPNEA)	16-Oct-20
Local community at the ESIA study area (Seman, Gjakalli, Seman i Ri, Hoxhare, Dermenas, Havaleas, Radostine, Çlirim, Radostine - Vadhiz, Zhupan)	Feb-21

Scoping Report Disclosure

The draft of the scoping report was published on the project website: <https://karavastasolar.com>, on 14th January 2021 and the stakeholders had the possibility to review the report for 30 consecutive days until 12th February 2021.

All the stakeholders were notified of the disclosure of the report by providing the website link through email contacts that were collected during the initial phase meetings. In addition, the local community was informed through posters and leaflets with contact details and mechanisms for returning feedback. The stakeholders had the possibility to provide comments and/or suggestions through email as a mechanism for feedback. Moreover, the scoping report was officially delivered to each of the administrative units crossed by the project in order to be made available to local community if requested.

After the 30 days of disclosure an online consultation meeting was organized to discuss relevant issues related to the scoping report disclosure and preliminary findings. In total 7 participants including; 1 national level, 2 regional and local level and 4 NGO's participated in the meeting. The discussion of this meeting is described in the stakeholder engagement report.

Socio – Economic Baseline Survey

Socio-economic baseline survey was conducted during December 2020 for the villages near to the PDA and during February 2021 for the villages along the OHL.

A total number of 364 questionnaires was completed for the resident households living within the survey area. In addition, 12 interviews were conducted with individuals/ Key Informants (KI) that have knowledge for the subjects (health, agriculture and livestock, infrastructure, local employment and education). Also, three focus group discussions with farmers and one with herders were organised.

The findings of the socio-economic survey are included in the ESIA baseline section.

Public Hearing according to Albanian legislation

Based on the requirements specified in DCM no. 247¹², dated 30.04.2014 "On determining the rules, requirements and procedures for informing and involving the public in environmental decision-making" the following methods are used for notification of the stakeholders for the Public Hearing event.

- Notification through local and national media:
 - Daily national newspaper "Panorama"
 - Apollonia Television
 - Radio Tirana
- Publication of the announcement on the website of Karavasta Solar
- Posters providing information for the public hearing and contact details were placed in the villages near the PDA and along the transmission line route.
- Invitation letters with attached 30 copies of non-technical summary to be made available to the local community were sent to Municipality of Divjake, Fier and to the REA. The same letter with attached 10 copies of non-technical summary were sent to AU of Remas, Libofshe, Topoje, Dermenas, Levan and Qender.
- All the stakeholders engaged in the previous phases were notified through email.

The Public Hearing was held on March 30, 2021 next to the school in the village of Nderenas, Libofshe, Fier. The meeting was conducted as per the following agenda:

- Registration of participants;
- Introduction
- Project presentation
- ESIA findings
- Discussions, questions and suggestions;

The table below describes the main activities and timeline of the disclosure process according to the Albanian legislation

TABLE 3: DISCLOSURE AND PUBLIC HEARING ACCORDING TO THE ALBANIAN LEGISLATION

Phase	Steps / actions	Documentation	Roles	Status	Timeline (start-end)
ESIA Public hearing	Prepare Public hearing package	NTS Request	Abkons	Completed	1 st week of February
	Request Public hearing		Abkons	Completed	24 th week of February
	Notification of the stakeholders	Notification letter, Poster, Leaflets, Newspaper, Tv stations, project Website	Abkons	Completed	9 – 29 th of March
	Organize Public hearing	PP presentation, signee sheet	Abkons/Voltage	Completed	30 th of March

Information disclosure Stakeholder Engagement Approach With COVID-19 Restrictions

Information disclosure and stakeholder engagement are cornerstones of managing the social and environmental impacts of projects. Due to Covid – 19 viruses outbreak some traditional consultation approaches are ruled out. The Ministry of Health and Social Protections instructions¹ have placed mandatory restrictions and social distancing measures to prevent the spread of the virus. According to these instruction public meetings are only allowed in certain cases even though under strict measures for enhancing protection of individuals and communities. Considering the mandatory restriction and social distancing measures the stakeholder engagement during the scoping phase was conducted as follows;

The engagement with national, regional and local institutions were organized in their premises.

The engagement with local communities was conducted through individual meetings (ad hoc).

The scoping disclosure report was conducted online.

The disclosure of the project information is conducted in line with the lenders guidance² that proposed the following alternative methods for disclosing information and engaging with stakeholders without gatherings.

Project leaflets - targeted leaflet drops house-to-house in village with contact details and mechanisms for returning feedback

Email campaigns - constant contact and mechanisms for returning feedback through company email; karavasta@voltage.com

Traditional media - newspaper, radio, television.

Engagement through local actors – administrators, chairman.

Signage - community notice boards, posters.

Project Website – www.karavastasolar.com; to disclose all the relevant project documents and mechanisms for returning feedback.

Even though with the social distancing measures in place, the Public Hearing event is still mandatory. However, the Public Hearing was conducted based on the following Ministry of Health and Social Protection instructions³ for enhancing protection of individuals and communities and preventing spread of the corona virus disease (Covid-19) which includes;

Open area venue of the meeting

Cleaning and disinfecting frequently touched surfaces within the venue as much as possible.

Cloth face coverings is mandatory in Albania. However, face coverings will be provided to attendees ahead of the event.

Temperature measurement of the attendees.

Ensuring distance by placing the seats 2 m from each other

Reduced number of attendees

Covid restrictions related to stakeholder engagement and especially large gathering and public meetings have all been lifted in Albania. The stakeholder engagement approach is now managed in normal conditions. Should covid restrictions entered into force again, the present SEP will be updated to match this.

ESIA Public Disclosure Meetings

Following ESIA public hearings carried out in March 2021 (see section 4.1.4 above), ESIA disclosure meetings were conducted during June 2022. This process is the last phase of public consultation before the final draft of the document.

¹ <https://new.shendetesia.gov.al/masat-e-reja-per-te-parandaluar-perhapjen-e-covid-19/>

² <https://www.ebrd.com/sustainability-covid.html>

³ <https://new.shendetesia.gov.al/masat-e-reja-per-te-parandaluar-perhapjen-e-covid-19/>

The process started with engagement with local authorities – heads of Administrative Units and heads of villages – to inform them about the process, and find the suitable venues for the meetings. At the same time, announcements were placed at the premise of Administrative Units and two additional announcements in each village. The process was carried out by Abkons and supervised by Voltage representatives.

The table provides an overview of the organized meetings, participating villages and premises:

TABLE 4: ESIA DISCLOSURE MEETINGS

Village	Project Component	Meeting Venue	Date and Time
Ndërnenas, Hasturkas, Karavast e Re	PV Plant and OHL	Ndërnenas (school of village)	22.06.2022 10:00
Seman i Ri, Seman, Gjokalli	OHL	Seman (Community Center)	22.06.2022 14:00
Sulaj, Dërmenas, Radostinë	OHL	Administrative Unit of Dërmenas	23.06.2022 14:00
Zhupan, Vadhiz, Çlirim, Drizë	OHL	Administrative Unit of Qender	23.06.2022 10:00
Peshtan i Vogel	OHL	Center of Peshtan Village	24.06.2022 11:00

As seen from the table above, several villages were invited in the same meeting. In order to encourage participation, Voltage, through Abkons contacted heads of villages to offer transportation for people coming from other villages to the meeting. However, all village leaders responded that transportation is not really necessary as villages are reasonably close to each other.

During meetings, ESIA process, anticipated impacts and planned mitigation measures were explained. Copies of Non-Technical Summary were handed to interested participants. In addition, Voltage team also presented the LRP program and GLAC, and the grievance mechanism. Copies of LRP and GLAC were distributed to interested participants, and a grievance leaflet was distributed to all participants.

Participation in the meetings was not high and interest in the project seemed low. One head of administrative unit explained in the meeting that the people's interest is not high as the perceived impacts in the community are low. Issues of interest raised during the meetings included employment, potential benefits of the community from the project, possible access limitation to certain places due to the construction of PV plant. In one meeting, one of the issues raised was the obstacles households may face in preparing the required documentation for voluntary agreement (bringing TAP project as an example).

Meeting supporting documents include Minutes of Meeting, participant's list, photos as well as an activity report. The ESIA Disclosure is reflected in the Stakeholder Engagement Report as well.

LRP - Related Stakeholder Engagement

Extensive stakeholder engagement was undertaken as part of the LRP-Related on site activities, especially during implementation of baseline surveys, and development of the Route Social Impact Register.

Stakeholder engagement related to the LRP commenced in September 2021 and is still ongoing in the Project area, as project rerouting has required the surveying of additional land parcels. The figure below, presents a summary of the onsite engagement carried out to date:

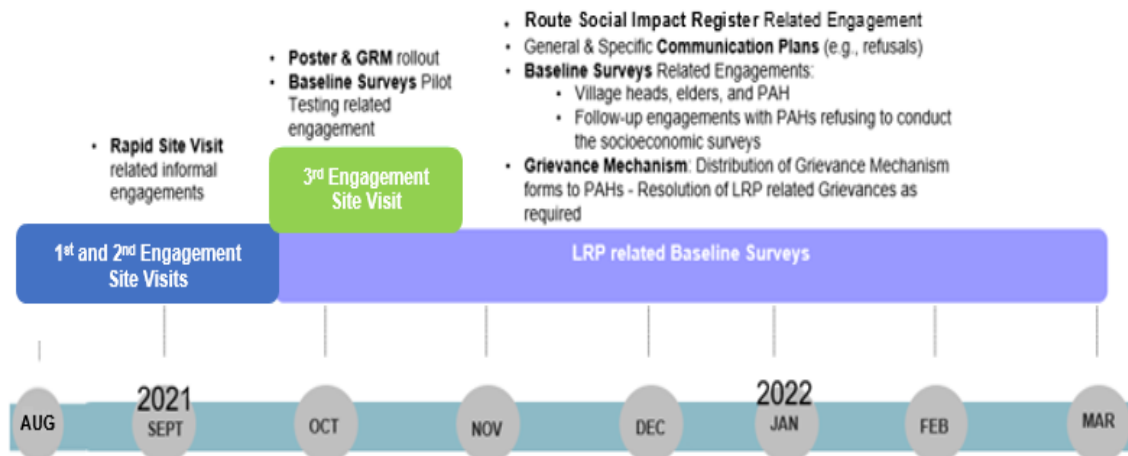


FIGURE 3: OVERALL ONSITE ENGAGEMENT TO DATE

LRP-related stakeholder engagement consisted of several engagements with Project Affected Households directly and indirectly affected by the Karavasta Project:

The Route Social Impact Register included stakeholder engagement with households in the immediate surrounds of the PV Plant Site and the OHL that could potentially be affected by the Karavasta Project (e.g., potential short temporary land access restrictions during construction)

The LRP-Related Baseline Surveys engaged with Project Affected Households whose land parcels will be directly affected by the Project impacts (permanent land take, land disturbance, and easement compensation) guided by specific Communication Plans.

In addition, LRP-related stakeholder engagement included placing informative posters in the villages nearby the Project area, distributing Grievance Mechanism forms, and engaging with Administrative Units' employees, elders of the villages, neighbours, and other groups and inhabitants (e.g., elders).

These activities are further described in subsections below.

Communication plan

Communication Plans were developed to guide key external engagement activities, such as execution of baseline surveys. For the baseline surveys, the following Communication Plans were developed:

- A General Communication Plan to guide baseline surveys related engagement, which included key messages on project overview, design, process, impacts, voluntary agreements/expropriation procedures, related impacts, and the importance of baseline surveys. The Communications Plan included guidance on engaging with stakeholders which was followed by the survey teams when conducting the socioeconomic and asset surveys.
- Additional Communication Plans targeted at PAH refusing to conduct the socioeconomic survey. In the cases where the PAH refused to conduct the socioeconomic survey, additional Communication Plans included additional key messages on the project process, the importance of baseline surveys and voluntary agreements, and answers to Frequently Asked Questions (FAQs) identified to date.

Communication plans will be regularly updated as part of the LRP implementation. Significant aspects that impact the overall project's SE approach will be presented in section 0.

Baseline Survey Related Engagement

Engagement as part of the LRP-related baseline surveys was conducted starting in October 2021 and is ongoing for the survey of new parcels identified on the basis of design/route changes. Meetings with PAHs to collect socioeconomic data begin with an introduction to the project design, process, and the purpose of the survey, and include discussions to collect baseline data information to inform the LRP. Households also have an opportunity to ask questions about the Project, and survey teams are guided by FAQs. When PAHs decline to conduct the socioeconomic surveys, they are re-contacted at later stages by senior personnel, following a specific Communication Plan.

In addition, engagement with Administrative Unit employees, elders of the village, neighbours, and other groups (e.g., elders) has been undertaken periodically. These engagements are critical in raising general awareness of the Project, and in verifying ownership information for some of the parcels affected by the Project. In these engagements, updated information on project design, process, schedule and impacts are provided.

Project information posters

In October 2021, posters were placed in the main villages where socioeconomic surveys were conducted: Adriatik, Çlirim, Ndërmenas, Radostinë, Drize, Peshtan i Vogel, Seman, Seman i Ri, Sulaj, Vadize, and Zhupan. The posters provide a brief description of the Project, and a direct hotline and email to contact the Project directly in case of questions, comments, and grievances.

Grievance Mechanism Rollout

The commencement of the LRP-related baseline surveys in October 2021 coincided with the Grievance Mechanism Rollout. The means by which Grievance Mechanism related information was made available to all stakeholders to make a complaint, grievance, suggestion, or question was threefold:

- Posters with a contact number and an email address where to contact the Project;
- Delivery of a Complaint Mechanism Form to all PAHs who were required to answer the socio-economic questionnaire, and all other interested parties; and
- Verbally introducing and explaining the process, and providing the contact number and e-mail address where to contact the project, not only to surveyed PAHs, but also to the village chiefs, neighbours, and other inhabitants (e.g., elders).

To date, Voltage has been contacted by 4 PAPs through the Grievance Mechanism, mainly to require more information about the Project, and, in one case, to inform the Project that a household was the owner of one of the affected parcels and wanted to conduct the socioeconomic and asset surveys. In addition, resolution of LRP related grievances is undertaken by the baseline survey teams in the field as required.

A grievance mechanism leaflet has been prepared and was distributed to participants during the ESIA disclosure meetings (see section 4.1.6 above). The mechanism is also explained during household visits and a leaflet is handed to the visited household.

Route Social Impact Register

Route Social Impact Register (RSIR) was developed to ensure any impacts beyond the ESIA study area (e.g., loss of access) are also identified and mitigated. The RSIR included an initial desk-based assessment of the Plant Site and OHL using satellite imagery, followed by verification through ground-truthing. The field verification activities were combined with initial engagements with PAHs proximate to the ESIA study area on potential impacts. The figure below shows stakeholder engagement related activities carried out on site during RSIR field verification.



FIGURE 4: Stakeholder engagement with PAPs during RSIR ground-truthing

LRP Engagement activities

Following LRP disclosure, the following activities have taken place as part of the LRP implementation:

Methodology & Stakeholder Group	Format	Frequency
Dissemination of Information & Grievance Resolution		
GLAC & LRP Disclosure to Regional and Municipal Departments and Agencies	Formal meetings	April 2022
GLAC Disclosure to PAHs	Household visits	June 2022
Engagement with PAHs having submitted a grievance to the Project if required	Ad-hoc meeting	Ad-hoc
Engagement with PAHs whose land is required for baseline geological studies on site	Ad-hoc meeting	Ad-hoc
Household Voluntary Agreements & Sign-off		
Face to Face meeting with the PAH (household head and spouse) to present Compensation Offer	Household visit	One-off starting from June 2022 to July 2022
Further visits to PAH (household head and spouse) for sign-off. Enhanced engagement for identified vulnerable PAHs	Household visits (2-4 meetings, as required)	Biweekly and weekly (one off) from June 2022 to July 2022

In the period June – July 2022, Voltalia has been engaged in the first meetings with Households affected by the Towers. A compensation offer was presented to them and they were asked to provide the required documents to reach Voluntary Agreement. As detailed in the current version of LRP, Voltalia agreed to assist households in securing documentation, but despite this commitment no household is ready to reach a Voluntary Agreement.

Considering this situation, for Voltalia is imperative to change the approach to land acquisition which consists in splitting the process of Permanent Land Acquisition in two independent processes:

- Expropriation process for all households; and
- In parallel compensation agreements with the households.

The households will receive full amounts of compensation as per project rates, in addition to the expropriation amount.

For this new approach need to be informed all affected households, so the actions below will take place:

- New face to face meeting with the PAH – August – September 2022; and
- Updated LRP to disclose to Regional and Municipal Departments and Agencies.

STAKEHOLDER IDENTIFICATION AND MAPPING

Introduction

For the purposes of this plan, a stakeholder is defined as any individual or group who is potentially affected by the 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), or have an interest in the project. Stakeholder identification is an on-going process, requiring regular review and updating as the Project proceeds.

Stakeholder Identification and analysis

In order to develop an effective SEP, it is important to understand how stakeholders are related to the Project and their needs and expectations for engagement and consultation.

This information can then be used to tailor engagement to each type of stakeholder. As part of this, it is important to identify stakeholders who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Project because of their marginalized or vulnerable status.

Stakeholder analysis will consider:

- Who is affected by the Project and how
- Who the formal and informal community leaders are and to what degree they can be seen as representatives
- Whether the stakeholder supports are neutral towards or is opposed to the Project
- Each stakeholder's key interests and concerns in relation to the Project
- How different stakeholders can influence the project and what risks or opportunities this presents to the Project
- What engagement methods, format and frequency are required to ensure that different stakeholders have access to project information and opportunity to provide their feedback

Different issues are likely to concern different stakeholders and so stakeholders have been grouped based on their potential connections to the Project. Understanding the connections of a stakeholder group to the project helps identify the key objectives for and best approaches to engagement for differing groups and individuals.

Project's stakeholder analysis considers the influence on the project and sensitivity to the project as defined below:

- *Influence*: Influence refers to the power that the stakeholders may have in relation to decisions either taken by, or affecting the Project. This may consist in formal control on the decision-making process or informal in the sense of, for instance, local leadership (e.g. traditional leaders), charisma (opinion leaders), or spiritual influence (e.g. religious leaders).

Sensitivity: A stakeholder sensitivity to a project stems from both its interest in the project and its vulnerability to the project's impact. Interests refer to the connection between the stakeholders and the Project, for example they may have something to either gain or lose from the Project, or strong expectations to manage. Vulnerability refers to the level of negative change a stakeholder will experience due to the project's presence and potential impacts and the level of ability of the stakeholder to cope with this impact.

Deciding on which mechanism to use is dependent on the level of feedback required, as well as on the ease with which participants can be involved in the engagement activity. One-on-one meetings and village meetings may be more appropriate for directly affected stakeholders where a two-way information flow is required to understand opinions and concerns. Press releases might be more appropriate for the general public (not directly impacted) where the engagement is more about information dissemination as opposed to seeking opinions and concerns.

A list of the organizations identified to date is provided below, together with a plan for their involvement in the various phases of engagement. This list will be kept up to date as new stakeholders are identified or express an interest in the project.

TABLE 5: IDENTIFIED PROJECT STAKEHOLDERS

Stakeholders	Interest and role in the project	Influence on project	Sensitivity to the project
Ministry of Tourism and Environment (MTE)	Supervision of the ESIA procedure and approval of the ESIA report. Ministry of Tourism and Environment is institution responsible for Environmental protection	High	Low
Ministry of Infrastructure and Energy (MEI)	The Ministry has a much broader responsibility as in addition to energy it includes transport, spatial planning and telecommunication, which is expected to facilitate coordination between sectors. The Ministry oversees the expropriation process for public interest in favour of a private entity where investments are in the public interest, such as the energy sector. The Ministry will also be transferring the state land to Voltage for the purpose of the development of the 140 MW Karavasta Project (PV Plant Site)	High	High
Ministry of Agriculture and Rural Development (MARD)	Ministry of Agriculture and Rural Development (MARD) is responsible for managing water resources, irrigation, drainage and flood protection. The Ministry coordinates priorities among different purposes and different users of water resources. The Ministry is also in charge of technical valuations and calculations of assets subject to expropriation (including crops and lands)	High	High
Ministry of Culture	Protection and conservation of the National cultural heritage (shall be informed in chance findings during the construction activities). Provide information for the cultural heritage in the ESIA study area.	Medium	Low

Stakeholders	Interest and role in the project	Influence on project	Sensitivity to the project
National Environment Agency (NEA)	Supervision, implementation of the ESIA procedure and review and approval of the ESIA report. Supervision of the public engagement during the ESIA process. Is responsible for monitoring how the company implements the requirements of the Environmental Statement. If the Company does not correctly implement them, then the NEA gives penalties based on law.	High	High
National Territorial Planning Agency (NTPA)	National Territorial Planning Agency (NTPA) is a public institution responsible for spatial and urban planning, crucial steps in the development process for infrastructure projects, within MEI.	Low	Low
National Agency of Property Compensation and Restitution	The change of political system Albania experienced in the early 1991 paved the way to a wide national range of privatization process of the state owned and common properties. The new transformation process required the creation of private ownership, taking as a basic reference the four main categories of land and property use, such as housing properties, agricultural fields, industrial or service buildings and lands, as well as properties being claimed for restitution by their legally documented owners before 1945. From 2006, Property Restitution and Compensation Agency (AKKP) is the responsible authority for managing the restitution and compensation process in Albania.	Low	Medium
National Agency for the Protected Areas (NAPA)	National Agency for the Protected Areas (NAPA), is a public body under the Ministry of Tourism and Environment, which is responsible for the management of protected areas.	High	High
National Agency of Natural Resources	National Agency of Natural Resources, a subordinated agency under the Ministry responsible for energy, has as scope of its work the development and supervision of rational use of natural resources, based on governmental policies.	Medium	Low

Stakeholders	Interest and role in the project	Influence on project	Sensitivity to the project
National Institute of Cultural Heritage - Ministry of Culture	Protection and conservation of the National cultural heritage (shall be informed in chance findings during the construction activities). Provide information for the cultural heritage in the ESIA study area. This is a central institution, under the responsible ministry for cultural heritage, established to carry out activities in the field of excavations and studies of cultural heritage, which is affected by construction works of any nature, or by plans for territory regulation.	Medium	Low
Transmission System Operator (OST)	Transmission System Operator (OST) provides the necessary capacities for the transmission of electricity produced from domestic sources. For the 140 MW Karavasta Project, Voltalia is responsible to obtain all legal permits and build the OHL before transferring OHL ownership to OST. However, OST will acquire the land directly, while Voltalia will facilitate the land acquisition process for OST. The Project is responsible for the valuation of assets (land, farm, and crops), which will be agreed with OST (Albanian Energy Operator) and the Ministry	High	High
State Agency Expropriation (SEA)	The SEA is a national agency, under the supervision of the MIE, and has the following competences in regards to the expropriation process: (i) the planning and treatments of expropriations; (ii) the calculation of expropriation value per each property subject of expropriation; (iii) the supervision of the expropriation process; (iv) maintaining the expropriation data base; (v) the right to negotiations with the subjects of expropriation regarding the value of the negotiations and the payment terms of the expropriation	High	High
National NGOs	NGOs with direct interest in the Project, and its social and environmental aspects and that are able to influence the Project directly or through public opinion. NGOs may also have useful data or insights into the local and national issues raised by the Project. International NGOs include organisations based within and outside Albania with an interest in the Project. They include international NGOs, multilateral and bilateral organisations.	Medium	Medium

Stakeholders	Interest and role in the project	Influence on project	Sensitivity to the project
National Media	Disseminate information regarding the project	Medium	Medium
Regional Directory of Environment, Fier Region	Supervision and implementation of the public consultation process. Assist and publish the PH notice and the Non-Technical Summary (NTS) at its webpage (hosted at NEA website). Attend the PH process and report to NEA about the compliance of the project with public consultation procedure. This report is important for final decision making by NEA and MTE. Certification of the public consultation procedure.	Medium	Low
Regional Agriculture Directorate	Authority in charge of elaborating and implementing agriculture and land use related programs	Low	Low
Agricultural and Rural Development Agency	National state agency aiming to support Albanian entrepreneurs in the agriculture and food sector, preparing the institution to benefit from EU and other donors' funding.	Low	Low
Drainage Board	Drainage Board is responsible for managing the irrigation, drainage, and flood protection.	High	Medium
Regional Agency for the Protected Areas (RAPA)	Regional Agency for the Protected Areas (NAPA), is a public body under the National Agency for the Protected Areas, which is responsible for the management of the Regional protected areas.	High	Low
Prefecture of Fier Region	Reporting key concerns/opinions to the Government. Role in facilitation of the public engagement and hearing process.	Low	Medium
Regional Council of Fier	Reporting key concerns/opinions to the Government. Role in facilitation of the public engagement and hearing process.	Low	Medium
Mayor of Fier Municipality	Elected representative of the community, reporting key concerns/opinions to the Government. Role in facilitation of the public engagement and hearing process.	Medium	High
Mayor of Divjakë Municipality	Elected representative of the community, reporting key concerns/opinions to the Government. Role in facilitation of the public engagement and hearing process.	Medium	High
Libofshe Administrative Unit, Municipality of Fier	Role in facilitation of the public engagement and hearing process.	Medium	High

Stakeholders	Interest and role in the project	Influence on project	Sensitivity to the project
Technical Directories of the Municipality	<p>Management of the local resources within the given competencies and technical support to the Mayor decision making. Role in facilitation of the public engagement and hearing process.</p> <p>- Urban planning directory (includes also environment), provide information for the land use plan in the ESIA study area. Provide information to protect the environment in the project study area.</p> <p>- Agriculture, forestry, irrigation and drainage directory, provide information for the agriculture land use in the project study area. Provide information for the forest's areas in the project study area. Provide information for the drainage system and plans in project study area.</p> <p>- Water supply enterprise provides information for the water supply systems in the project study area.</p>	Medium	High
Local Leaders and Groups (e.g., farmers, women's associations...)	<p>Organizations with direct interest in the Project, and its social and environmental aspects and that are able to influence the Project directly or through public opinion.</p> <p>Such organisations may also have useful data and insight and may potentially become partners to the Project in areas of common interest such as the implementation of community investment as applicable.</p>	Medium	High
Local community residents living in the ESIA study area	<p>Settlements in the ESIA study area of influence which will be reviewed in light of the ESIA and significance of impacts after mitigation.</p> <p>Settlements likely to experience impacts pertaining to disturbance from construction activities (noise, air etc.); some job creation.</p>	Medium	High
Owners/users of the land to be acquired, leased or used in easement	Grazers and farmers owning or using the land in the Project area will be affected by construction and operation of the OHL, PV Plant, and associated infrastructure		
Directly-Affected Households	Those losing land permanently or temporarily, or losing access to land or established crops and natural resources, or those who will experience easement restrictions	Medium	High

Stakeholders	Interest and role in the project	Influence on project	Sensitivity to the project
Vulnerable persons identified through the socio-economic survey	Disabled persons, the elderly, female headed households, households with no or limited resources, widows and orphans, informal tenants/sharecroppers, other land users with no formal titles.	Low	High
Business community members- at the ESIA study area	Potential partners in managing potential cumulative impacts during the construction phase of the project. The project may also have an impact on the activities of these groups.	Medium	High
Birds of Albania (BA); Albanian Ornithological Society, (AOS); Protection and Preservation of Natural Environment in Albania (PPNEA) Birdlife international	Interest in environmental protection and disclosure of the project impacts and mitigations strategy. Important group in the public hearings process.	Medium	Medium
Regional and local media National Television (TVSH) Local Television (TV Apollon)	Communicate on the project and facilitate the ESIA disclosure.	Medium	Low

Stakeholders are registered in a Stakeholder database detailing their names, positions, organisations and contact details. This database is not public and appropriate data protection measures apply to ensure respect of privacy for all stakeholders.

STAKEHOLDER ENGAGEMENT METHODOLOGY

Approach to stakeholder engagement

This SEP methodology has been developed in order to outline the principles and methods that should govern Voltage's engagement with all existing and potential stakeholders during all phases of the project.

The stakeholder engagement process has commenced during the ESIA phase and LRP process and will continue until project decommissioning. The present document focuses on the completion of the ESIA, LRP and construction start. The stakeholder engagement will continue during the entire lifecycle of the project.

It has been determined that all relevant stakeholders would be invited to participate in a

set of meetings, in various phases of the process, in order to be informed regarding the findings and recommendations of the study team.

The main principles that will guide throughout stakeholder engagement are as follows:

Proactive: In order to avoid any potential risks that might arise in our dealings with stakeholders.

Transparent: The Company will engage with stakeholders in an open process, with transparent purpose, goals, accountabilities, expectations and constraints.

Timely: The Company will engage with stakeholders in the advance of the consultation activities and decision-making, in order to allow sufficient time for meaningful dialogue, consultation and modifications.

Inclusive: The Company will ensure inclusiveness of our engagement with stakeholders in representation of views, including women, key informants and focus groups.

Accessible: The Company will disseminate information in ways and locations that facilitate the access of stakeholders to it.

Free: The Company's engagement with stakeholders will be free of any kind of manipulation, intimidation and coercion.

The plan lays out the process for consultation and disclosure, based on lenders' requirements, and consists of the following phases:

- ESIA Scoping Phase
- ESIA Study
- ESIA Disclosure
- Livelihood Restoration Plan
- Site Preparation and Construction
- Operation of the Project
- End of Life / Decommissioning.

This SEP describes the communication with identified stakeholders and the various levels of engagement. When communities are predicted to be adversely affected, information, consultation and disclosure should contain the following information:

- Purpose, nature and scale of the project;
- Duration of the proposed project activities;
- Any risks and potential impacts with regard to environment, worker Health & Safety, other social impacts on communities and proposed mitigation plans;

The envisaged consultation process, if any, and opportunities and ways in which the public can participate;

Time/venue of any envisaged public meetings, and the purpose by which meetings are notified, summarised and reported.

The stakeholder engagement process should begin at the earliest stage of project planning and continue throughout the life of the project, with a focus on:

- Engagement during project preparation/design (including disclosure);
- Engagement on the pre-construction and construction phase;
- Engagement during project operation phase;
- Engagement during decommissioning phase

Method of consultation

Project stakeholders differ in terms of information that is essential to disseminate, to what is 'good to know'. Stakeholders also differ in how they would expect to receive project information, and in light of this, engagement materials and tools used, have been tailored towards the target

audience. For instance, different materials have been designed and adapted to engage local communities, Government officials and NGOs.

The following methods will be used to ensure effective participation of the potentially affected people:

- Advertisement regarding project and planning activities in the local newspaper
- Radio and television announcements of meetings
- Information leaflets will be distributed among participants of the public consultation at the local municipalities
- Public meetings will be held in Albanian, the local language spoken in local communities, with Power Point presentation in the settlements located close to the ESIA study area.

The consultation approach should be culturally appropriate and should take into account the purpose for engaging with a stakeholder group. The following engagement methodology are used to consult with stakeholders:

TABLE 6: ENGAGEMENT TECHNIQUES TO BE USED

Engagement Techniques	Most Appropriate application of techniques
Information Points and Boards	<ul style="list-style-type: none"> • Provide project information on the public boards and information points • Publish information on Company website
Poster and Leaflets	Provide project information on the project and the main steps of ESIA
Electronic correspondence	Invite stakeholders to meetings Project information presentation to government officials, organizations, agencies
Project website	Present project information and progress updates Disclose Stakeholder Engagement Plan (SEP), Grievance Mechanism (GM), Environmental and Social Impact Assessment (ESIA), Non-Technical Summary (NTS), Environmental and Social Action Plan (ESAP) and other relevant project documentations
Media Plan	Disseminate project information to large audiences, and illiterate stakeholders Inform stakeholders about consultation meetings Disclose ESIA as per the national legislative requirements
Formal Meetings	Present project information to a group of stakeholders Allow the group of stakeholders to provide their views and opinions Build impersonal relations with high level stakeholders Distribute technical documents Facilitate meetings using PowerPoint presentations Record discussions, comments/questions raised and responses
Public meetings	Present project information to a large audience of stakeholders, and in particular communities Allow the group of stakeholders to provide their views and opinions Build relationships with neighbouring communities Distribute non-technical project information, facilitate meetings using PowerPoint presentations, posters, models, videos and pamphlets or project information documents Record discussions, comments/questions raised and responses

Engagement Techniques	Most Appropriate application of techniques
One-to-One meetings	Seek views and opinions Enable stakeholders to speak freely about sensitive issues Build personal relationship Record meetings and photo logbook
Focus Group Discussions (FGD) and Key informant Interviews (KII)	Allow a smaller group of between not less than 5 people to provide their views and opinions on targeted baseline information Build relationships with neighbouring communities Use a focus group interview guideline to facilitate discussions Record feedback Gather opinions and views from individual stakeholders Gather baseline data Develop a baseline database for monitoring impacts.

Internal organisation

Votalia's HSES Manager is responsible of ensuring the SEP is correctly implemented. Within the HSES team, Votalia's social advisor is responsible for managing the stakeholder engagement process with the support of Votalia's Community Liaison Officer.

The Social advisor will be in charge of maintaining and updating the SEP, especially with regards to defining the engagement strategy for the various sets of stakeholders and the planification of the stakeholder engagement program.

The CLO is responsible for implementing community engagement activities. The CLO, shall participate in all planned stakeholder engagement activities. The CLO will be responsible for on-going monitoring and review of the effectiveness and efficacy of the Grievance Mechanism. Their responsibilities relay on ensuring effective operation of grievance management process including registration, investigation and resolution of grievances and conduct grievance reporting.

The CLO will be responsible for managing all activities related to database, documents and logistics; and integration/support, which relates to the interaction with other departments, initiatives or project phases. Other responsibilities of the CLO include the following:

- Manage arising community matters;
- Communicate grievance management process to communities
- Interact with related and complementary support activities that require ad hoc or intensive stakeholder engagement (community development and land acquisition/livelihood restoration planning and implementation);
- Act as main point of contact between the Company and stakeholders;
- Monitor Contractors grievance management. Grievance reporting (As stated in previous paragraphs, this SEP will be updated prior to future project phases).

Identification of Women and Vulnerable Groups

The planning process considers the situation of women and youth and adapts the engagement process as necessary to ensure that women have a role in decision making.

This includes the identification of:

- Women's means of income generation and livelihoods, including non-formal activities

such as gathering natural resources

- Women's social and economic networks, including extended family ties, and,
- Women's ownership of affected land and crops, to appropriately compensate them.

Women's status in Albania remains somewhat marginalised. The primary issue facing rural women is a lack of economic empowerment, resulting from traditional custom, and having limited access to employment and income-generating opportunities, a lack of skills training, and a general detachment from economic development.

Their intimate knowledge of issues such as land management, water resources, and food security make women essential contributors to a consultation process. They can provide valuable information to specialist studies and are frequently in a good position to identify community needs and priorities that can be supported by social development programs.

The following specific steps are being taken to promote women's equitable and meaningful participation:

- Consultative events such as meetings are timed to consider the various demands on women's time such as other work, childcare, and meal preparation
- Baseline social profiles compiled as part of the economic displacement process include an analysis of gender dynamics and disparity between men and women's participation in the local and district/region economy. This information is used as a basis for further planning to involve and meet the needs of female community members
- When monitoring the effects of ongoing community consultation, data is collected and recorded in a gender-disaggregated manner so as to provide insight into the differential impacts of the Project on women and men.

STAKEHOLDER ENGAGEMENT PROGRAM

Summary of planned engagement

The upcoming stakeholder engagement activities planned by Valtalia are listed below and presented in more details in the sections below:

- Public disclosure of the ESIA findings, the LRP and GLAC (LRP package) to stakeholders according to lender's requirements
- Public disclosure of and targeted engagement for land acquisition
- LRP implementation related engagement
- Site mobilization and construction related stakeholder engagement

The SEP will be regularly updated following the construction phase start so that engagement activities reflect the evolutions in the construction process and at least on a quarterly basis. The SEP will be updated to present operation phase engagement activities at least three months before the of the construction period.

An indicative schedule of the engagement activities up to site mobilisation is presented below.

TABLE 7: STAKEHOLDER ENGAGEMENT SCHEDULE

Activity	Method of engagement	Dates
ESIA public disclosure	Disclosure of documentation online and in specific locations	Start date: 10 June 2022 Start date: 22 June 2022
Land acquisition targeted engagement	Public meetings	14 June 2022

Pre construction site mobilisation		PV plant – from the 8 June 2022 OHL – 19 October 2022
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LRP package engagement activities

Extensive engagements have been carried out extensively during the development of the plan leading to people affected by the land acquisition aspect of the project and especially the OHL to be well informed about the LRP process and timing. To ensure appropriate information of all stakeholders and follow lenders' requirements in terms of public disclosure, two sets of engagement activities will be carried out over the month of May 2022 as follow:

- Targeted engagement towards landowners of parcels where OHL towers will be built to present them in details the land acquisition process as described in the LRP including the voluntary agreement phase for land acquisition, the compensation calculation and, in case of refusal to sell their land, the expropriation process as per Albanian regulations and Lender's standards. This targeted engagement will be carried out in parallel to the LRP package public disclosure and may be completed prior to the completion of the public disclosure period.
- General information of landowners and land users in the PV plant area and OHL corridor about the land entry process, temporary land access, loss of crop or livelihood compensation calculation and potential additional remediation measures.

The LRP and Guideline for Land Acquisition and Compensation (GLAC) are publicly disclosed from the 28th of April 2022. As per the ESIA, the LRP and GLAC is published on the Karavasta Solar website at <https://karavastasolar.com/sq/plani-i-rivendosjes/>. Printed version of the LRP and GLAC are also available at the administrative units' offices where public meetings will be held.

The LRP and GLAC were presented during the ESIA public meeting presented in [Table 7](#)

The targeted engagement toward OHL towers parcels' landowners will be carried starting in May.

LRP implementation

Following LRP package disclosure, the following engagement activities will take place as part of the LRP implementation. This timeline will be refined once the OHL construction schedule will be defined.

TABLE 8: LRP IMPLEMENTATION ENGAGEMENT ACTIVITIES

Methodology & Stakeholder Group	Format	Frequency
Dissemination of Information & Grievance Resolution		
Updated LRP Disclosure to Regional and Municipal Departments and Agencies	Formal meetings	August 2022
Engagement with PAHs having submitted a grievance to the Project if required	Ad-hoc meeting	Ad-hoc
Engagement with PAHs whose land is required for baseline geological studies on site	Ad-hoc meeting	Ad-hoc
Household Voluntary Agreements & Sign-off		
Face to Face meeting with the PAH (household head and spouse) to present new approach of Land Acquisition	Household visit	One-off starting from August 2022 to September 2022
Further visits to PAH (household head and spouse) for compensation agreement sign-off.	Household visits	As required
Land Entry & Exit		

Methodology & Stakeholder Group	Format	Frequency
Construction Manager and CLO engagement with PAHs to sign Land Entry Protocols	Household visit	During construction as required
Construction manager, Agronomist and CLO engagement with PAHs to sign Land Reinstatement & Exit Form	Household visit	During construction / post-construction as required
Dissemination of Information & Grievance Resolution		
Information boards in each village re: employment, training, safety issues, and construction schedule	Public notice boards	As required
Scheduled visits by Community Liaison Officers to each village	Initial meeting and visits by CLO(s) in each village	Weekly or as required
Livelihood and Vulnerable Programs		
Livelihood and Vulnerable Programs	Household visit as part of Sign-off process	As required

Site mobilization and construction

During pre-construction and before site mobilisation, Voltage will inform stakeholders about construction activities through community boards, information on the Project website, and via tools and media announcements or local postings in the settlements. Voltage shall be in close contact with the local municipalities via the Community Liaison Officer (CLOs) who will also follow up on grievances that may occur.

Voltage will aim to instal information boards at the entrances and/or centres of every affected settlement and at relevant locations along the ESIA study area. Information in relation to access and traffic management during construction will be provided on the boards.

Voltage and its subcontractors as appropriate will provide local communities with information on the planned works in their area including the type of works, schedule, potential risks, and mitigation measures at least two weeks prior to commencement of works. Stakeholders will receive regular updates of the progress of works monthly and any delays in the planned works will be communicated to the relevant stakeholders.

As part of the site mobilisation and start of construction, regular updates will be provided to the head of the relevant administrative authorities such as district, municipalities and administrative units affected by construction works. These authorities will be informed and consulted at least once per month when works are planned in their territories.

GRIEVANCE MECHANISM

Grievances are any complaints or suggestions about the way a project is being implemented. They may take the form of specific complaints for damages / injury, concerns about routine Project activities, or perceived incidents or impacts. Identifying and responding to grievances supports the development of positive relationships between projects and the communities, and other stakeholders they may affect.

Objectives

Participation in the grievance mechanism is voluntary, anonymous (where required) and free. The main principles on which the grievance mechanism is based are:

Proportionality: a mechanism scaled to the potential risks and adverse impacts that the Project may impose on affected communities.

Cultural appropriateness: a mechanism designed in a culturally appropriate manner.

Accessibility: a clear and understandable mechanism that is accessible to all segments of the affected communities at no cost to them. Grievances may be received face-to-face, via telephone, email or post.

Transparency and accountability: a mechanism that operates in a transparent way and that is accountable to all stakeholders.

Appropriate protection: a mechanism that prevents retribution and does not impede access to other remedies, including public judicial or non-judicial mechanisms.

The grievance mechanism shall not impede access to the country's judicial or administrative remedies. An affected person can approach a court of law at any time and independent of the project level grievance redress process. Along with the Lenders' requirements on development and approval of grievance mechanism by implementation of investment projects, grievance redress procedure in Albania is also regulated by the national legislation of Republic of Albania, in particular by the law "Nr. 119/2014 On Public Information rights". According to the "Nr. 119/2014 On Public Information rights", the application or complaint shall be considered within ten days from the date of receipt in the state authority. The submission procedure for grievances and citizens' applications needs to be discussed during the public consultations in the project districts.

Process

The grievance mechanism for the Project takes into account the national legislation, as well as Lenders' requirements.

The Affected Party (APs) will have the right to file complaints and queries on any aspect of Project activity and land acquisition. Valtalia will be responsible for establishment of Grievance Mechanism (GM) and act as the GM secretary to make sure that the GM is operational to effectively handle environmental and social concerns of project affected persons. The proposing GM will be presented during the public consultations. Valtalia will ensure that grievances and complaints on any aspect or issues that may arise, are addressed in a timely and satisfactory manner.

All possible avenues are made available to the APs to resolve their grievances at the project level. Under the proposed project level grievance mechanism, affected households may appeal any decision, practice or activity connected with the resolution of a grievance. APs will be made aware of the procedures they can follow to seek redress, including, if necessary, resort to the courts. The project GM will be disseminated to APs through the consultation meetings, FGDs, and KIIs.

Grievance Mechanism workflow

The flow chart in the levels summarizes briefly how a grievance is processed:

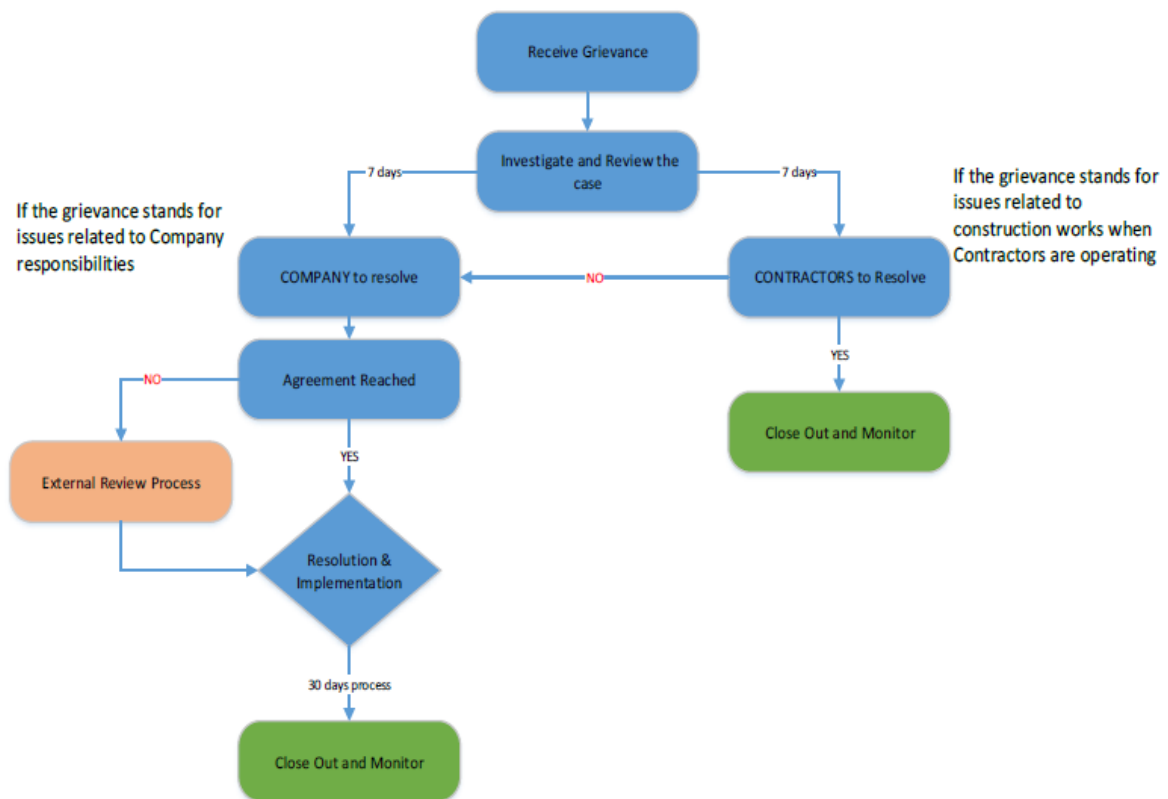


FIGURE 5: STEPS OF GRIEVANCE AND RESPECTIVE LEVELS

Identify, receive and register grievance: any person or stakeholder group may send comments, complaints and/or requests for information in person or via post, telephone or email using the contact information provided on the Company website, as well at any poster/banner at the villages and settlements. The received grievance shall be registered in the database **within 7 working days**. The grievance register shall record:

- the name, gender, vulnerability status and contact details of the complainant, if a grievance is not lodged anonymous;
- the date and nature of the complaint
- the name of the technical staff charged with addressing the complaint, if appropriate
- any follow up actions taken
- the proposed resolution of the complaint
- how and when relevant Project decisions were communicated to the complainant
- the date of closure of the grievance and the complainant's response (satisfied/dissatisfied)
- whether longer-term management actions have been taken to avoid the recurrence of similar grievances in the future, if applicable.

Direct contact information of the person responsible for grievance redress will also be available. Grievances will be collected during the pre-construction phase (where most of the grievances are expected to be related to the project influence), during the implementation of any construction works under the investment programs, and also during operations. Grievance Register shall be in place and updated for every grievance registered by the Company. The Grievance Register will also serve as a historic track of different solutions of Company and construction contractors to different issues presented and the time frame for solution for each grievance;

Acknowledge: the complainant is notified within a period of 7 days by the Company from the receipt of the grievance that their grievance has been received and assigned. They should also be provided with contact information of the person responsible for the resolution of their grievance

and the estimated time for completion. If it is decided that a grievance is not valid or doesn't fall under the company's jurisdiction, the Grievance Manager is obliged to notify the complainant **within 7 days** from receipt of the grievance, and where possible direct them to the responsible third parties;

Assess and categorize: in the first instance grievances will be assessed by the Grievance Manager, who will consult other relevant sectors / employees in the process as necessary. They will decide who should deal with the grievance and determine whether additional support is necessary. The manager decides which grievances should be responded to internally and which fall outside of the impact of the project. If the grievance is to be dealt with internally the grievance manager formally delegates the further handling of the grievance to the relevant department / personnel / contractor for development of an appropriate response;

Resolution process: a response is developed by the delegated team and CLO. The process of issuing grievance feedback, explaining time required for resolution and the required progress, if not yet resolved, shall be reported back to the stakeholder within 30 days.

Review the response: Based on the understanding thus developed, the CLO, in consultation with the concerned departments, shall identify a suitable resolution to the issue. In case the issue is beyond the delegated powers of the Grievance Manager, it should be escalated to upper management (as appropriate). This resolution shall be accordingly communicated to the complainant within 30 working days of the escalation.

Review the response if unsuccessful: As noted above, in some cases it may not be possible to reach agreement with the complainant on the proposed response. In this situation the Grievance management staff should review the situation with the complainant and see whether any modification of the response might meet the concerns of the complainant or should inform the latter about other alternatives that may be available. However, if the Complainant is not satisfied with the outcomes an additional external review will be considered and offered to the Complainant.

Communicate proposed resolution and Implement approach: the proposed resolution should be confirmed with the complainant before implementation to minimize unnecessary/unwarranted actions. If they agree with the approach required actions are implemented to deal with the issue. Completion of actions is recorded in the grievance register. The response is signed off by the appropriate manager. This includes either a signature of the grievance register or confirmation in official correspondence (which will then be filed with the grievance to indicate agreement and referenced in the register); The process of communication of the proposed response should normally occur after 30 days of the receipt of the grievance (depending on type of grievance)

Follow-up and close out: any further response from the complainant is recorded to help assess whether the grievance is closed or whether further action is required. The Grievance Manager will use appropriate communication channels to confirm whether the complainant has understood and is satisfied with the response. This communication should also be recorded in the grievance register. Finally, the Grievance Manager determines whether the grievance can be closed or whether further attention and action is required. Issue of grievance feedback when mitigation established within the assigned timeframe can be done in a period of 30/60 days (depending on the severity level of grievance)

MONITORING AND REPORTING STAKEHOLDER ACTIVITIES

It will be important for the Project to monitor and report on the on-going stakeholder engagement efforts to ensure that the desired outcomes are being achieved, and to maintain a comprehensive record of engagement activities and issues raised. This will be done through this SEP, where the following will be recorded internally through this plan:

- Updates to the stakeholder database
- Recording of all consultations held
- Updates to the grievance log.

The list of stakeholder groups to be consulted on an on-going basis will be continually revised and updated as additional stakeholders are identified and will include, but not be limited to the following:

- Regulatory authorities
- National, State and local government
- Local community leaders (heads of villages and leaders of groups etc.)

- Community groups representatives.

Minutes of all engagement activities will be uploaded onto the stakeholder register for internal use and consideration by the project team. The Register will be reviewed on a regular basis by the HSES team to identify any trends in grievances and corrective actions that are required.

The effectiveness of the stakeholder engagement activities will be assessed to determine if the respective activities have achieved the purpose of ensuring a meaningful consultation of stakeholders and an informed participation.

Stakeholder engagement will be reported based on the data collection and analysis, disclosure of all the materials and proof-documentation of each meeting and survey outcomes as well. In conjunction with this, the stakeholder engagement tools will be used to record and analyse feedback received from stakeholders.

A final report on stakeholder engagement for the ESIA phase will be prepared based on the strict monitoring and progress information and data collection during the consultation. This report will be updated and subject to be updated in continuum during all the Project Cycle.

In terms of monitoring and reporting, additional tools will be used to record and maintain the stakeholder participation and engagement such as participants' lists, performance questionnaires, photo logbooks etc.

TABLE 9: REPORTING MATERIALS

Reporting Material	Description	Purpose	Audience/ Data Source
Stakeholder Engagement Plan (SEP)	Outlines the engagement process that will be conducted for the Project ESIA, as well as future engagement activities, namely site clearance and construction, operation, and end-of-life/decommissioning.	To ensure that a consistent, comprehensive, coordinated and culturally appropriate approach is taken to stakeholder engagement and Project disclosure throughout the ESIA and development of the Project	Voltalia Project stakeholders
Stakeholder Engagement Report (SER)	Describes all the engagement that are conducted for the project ESIA	Detailed information for the stakeholder engagement process conducted in all phases of the ESIA. All the findings, comments and a summary of the feedback will be provided in this report.	Voltalia
Minutes of Meetings (MoM)	A reporting template	Provide a summary of the meeting discussions, comments and suggestions	Project stakeholders at National & Local level
Participants List	A reporting template	Provide the summary of the people participating in each meeting and is a topic for the final reporting	Project stakeholders at National & Local level meetings
Grievance Log	Company's database containing all grievances received and registered	All received grievances will be analysed in terms of trends and effectiveness of resolution (complainant satisfaction,	Voltalia

Reporting Material	Description	Purpose	Audience/ Data Source
		resolution time etc)	
Photos	A reporting factsheet	Proof of the action/consultation during the stakeholder engagement process	During all the processes

The SEP will be reviewed on regular basis and updated to take into account the results of the review. Voltage Social adviser will be responsible for this review. The SEP is going to be updated before beginning of the Project construction works, as needed, and during operation of the Photovoltaic Park Karavasta. Each SEP update shall also include information about previous stakeholder engagement activities and a summary of the outcomes.

The results and further consultation shall be reflected in the future updates of the SEP as per the Project phases. This SEP identifies various activities in future project phases that require monitoring and reporting including the following:
The updating of the SEP.

CLO activities: minutes of consultation meetings will be produced, and all original written consultation correspondence will be retained as evidence of the process and outcomes. Grievance logging and tracking: each grievance will be logged by the CLO, given an identification number and followed through by recording details and timing for their resolution and closing out. Annual reporting: A Project specific annual report summarizing project performance, CLO activities including grievance resolution analysis (with the privacy of affected individuals protected) and updates to the SEP will be produced.

Public domain documents will be distributed widely to stakeholders including regulatory agencies, NGOs, local authorities, and local communities.

As part of the ESIA, an Environmental and Social Management and Monitoring Plan will detail specific monitoring and reporting requirements for environmental and social project performance.

Ongoing Reporting to Affected Communities

Voltage will prepare periodic reports to the APs that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on APs 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 APs, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of APs but not less than annually.

Monitoring and reporting of the stakeholder engagement process is considered vital in ensuring the capabilities needed to respond to identified issues and later the schedule and nature of the engagement activities in order to make the participation more effective.

Contact details for the Public

To ensure that stakeholder engagement is a two-way process, public information requests about the project and feedback can be sent to:

Postal address of Voltage : Ndërtesa ETC, Bvd. Bajram Curri, Kati 9, Zyra 3, Tirana, Albania

Email: karavasta@voltage.com

Contact form on website: www.karavastasolar.com

Phone number: +355 6840 27034

ANNEXES

Annex 1 – Stakeholder database template

Annex 2 – Media Announcement

Annex 3 – Invitation letters

Annex 4 – Mail Confirmation Receipts

Annex 5 - Project leaflets

Annex 6 – Posters and Photos

Annex 7 – Minutes of Meetings

Annex 8 – Attendance lists

Contact us

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