



STAKEHOLDER ENGAGEMENT PLAN			
<b>SUBJECT OF THE AGREEMENT:</b>	Sub-plans for Zaporizhia Wind Farm Project		
<b>INVESTMENT:</b>	Zaporizhia Wind Farm Project		
<b>LOCATION:</b>	Ukraine Zaporizhia Region Melitopol and Priazovsk Districts		
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# STAKEHOLDER ENGAGEMENT PLAN

*Note that this plan contains potentially sensitive information, so distribution should be handled carefully.*

*Limits on distribution could be addressed or noted within the plan.*

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## Abbreviations & Acronyms

<b>Contractors</b>	Principal contractors appointed by the Project Company for construction works, supplies and operation activities
<b>EIA</b>	Environmental Impact Assessment
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMMP</b>	Environmental and Social Management and Monitoring Plan
<b>ESMS</b>	Environmental and Social Management System
<b>GM</b>	Grievance Mechanism
<b>IFC</b>	International Finance Corporation
<b>IFC-PS</b>	International Finance Corporation - Performance Standards
<b>KPI</b>	Key Performance Indicator
<b>MDP</b>	Melitopol District Parliament
<b>NGOs</b>	Non-Government Organisations
<b>PDSA</b>	Priazovsk District State Administration
<b>Project</b>	Zaporizhia Wind Farm
<b>Project Company</b>	EuroCape New Energy Ltd./EuroCape
<b>PDSA</b>	Priazovsk District State Administration
<b>SEP/Plan</b>	Stakeholder Engagement Plan
<b>UNECE</b>	United Nations Economic Commission for Europe
<b>WTG</b>	Wind Turbine Generator

## Glossary

<b>Affected Communities</b>	Refers to groups of people living in close proximity to a project that could potentially be impacted by a project (“Stakeholders,” in contrast, refers to the broader group of people and organisations with an interest in the project).
<b>Community Social Investments (Voluntary Social Infrastructure Program)</b>	Contributions (monetary, staff time or gifts in kind) that are made to stakeholders and bring benefits to these stakeholders over and above an operation’s core activities. The beneficiaries of these contributions can range from local to national and international stakeholders. These investments are generally aimed at addressing needs within a target community. The scope of these activities could range from donations to charities that link with business needs and strategies, for example capacity building and skills development amongst local residents for employment purposes, and local procurement.
<b>Consultation</b>	The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
<b>Dialogue</b>	An exchange of views and opinions to explore different perspectives, needs and alternatives, with a view to fostering mutual understanding, trust and cooperation on a strategy or initiative.
<b>Engagement</b>	A process in which a company builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader “stakeholder engagement” strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.
<b>Environmental and Social Impact Assessment</b>	An assessment comprising various social and environmental studies which aim to identify project impacts and design appropriate mitigation measures to manage negative impacts, and to enhance positive ones.
<b>Non-Government Organisations</b>	Private organisations, often not-for-profit, that facilitate community development, local capacity building, advocacy, and environmental protection.
<b>Partnership</b>	In the context of engagement, partnerships are defined as collaboration between people and organisations to achieve a common goal and often share resources and competencies, risks and benefits.
<b>Stakeholder</b>	Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively (IFC’s Handbook on Stakeholder Engagement (2007)); workers, local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g. local authorities, neighboring projects, and/or nongovernmental organisations, etc.
<b>Stakeholder Engagement Plan</b>	A plan which assists investors with effectively engaging with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.

## 1. Introduction

This *Stakeholder Engagement Plan* (SEP) relates to an investment that concerns development of a wind farm.

The proposed project will be undertaken in south-eastern Ukraine, Zaporizhia Region, Priazovsk and Melitopol Districts, outside the boundaries of the village settlements.

Zaporizhia Wind Farm (the Project), as all, will comprise up to 167 Wind Turbine Generators (WTGs) along with the technical infrastructure of service/manoeuvring yards, access roads, an underground power transmission and steering cables and the administration and on-site facilities complex. The planned investment will also consist of a main transformer station and overhead power transmission line.

### 1.1. Background

The current layout of the Zaporizhia Wind Farm has been subjected to rigorous assessment against numerous potential environmental and social constraints such that the optimum layout is selected and approved by the Planning Authority. This optimum layout takes into account aspects such as: ecology, geology, hydrology, hydrogeology; noise, landscape and visual impacts, etc. The wind farm is therefore designed in order to avoid or minimise impact on these aspects, while taking into account practical and commercial considerations as well as social interests.

In order to ensure environmental and social issues associated with each phase of Zaporizhia Wind Farm Project are managed in a systematic way, the *Environmental and Social Management System* (ESMS) has been established.

Results of an initial identification of the environmental and social aspects and assessment of potential impacts associated with the Project implementation has been documented in the *Environmental and Social Impact Assessment* (ESIA) Report for the three phases of the Project: construction, operation and decommissioning.

Project's risk management strategy has been elaborated and presented in the *Environmental and Social Management and Monitoring Plan* (ESMMP) and detailed within a set of topic-specific management and monitoring plans, which encompasses also a *Stakeholder Engagement Plan* (SEP).

It is the Project Company responsibility to develop project-specific SEP and maintain the *Plan* throughout all stages of Project implementation. Contractors responsibility will be to participate actively in the process of dealing with grievances regarding their scope of work. They will also take a part in a process of disclosing a key information regarding the progress of works conducted by them and any inconvenience and difficulties that may be experienced by local communities.

The Project team has planned for and will work to involve, engage and listen to all key stakeholders. Presented below SEP details engagement undertaken with stakeholders during the pre-feasibility stage of the Project and will assist the Project Company in managing and facilitating future engagement throughout the various stages of the Project's life cycle.

Stakeholder engagement has already been embedded into Project Company corporate development policy and corporate culture, and since 2009, up to now has proven itself to be visibly advantageous.

That is why, SEP is considered as to be a “live” document. Pending on the development, the *Plan* will be updated prior to the start of the operation phase and implemented as part of the operational phase of the Project. It will be regularly monitored and periodically reviewed (at least annually) and modified (when such a need appears) in light of operational changes, learnings experienced during its implementation and other activities that can affect originally identified stakeholders’ groups.

The Project Company allocated sufficient resources and costs for stakeholder engagement and associated grievance mechanism management which has been included in the capital expenditure budget for the Project.

## 1.2. Objectives

The Project Company recognises that stakeholders can be critical to the Project’s success.

It should be noted, that the Project Company, up to now, has been developing the Project on the basis of the fair relations with the communities, authorities and other stakeholders, like scientific institutes or power supply companies.

This *Stakeholder Engagement Plan* will be used as a tool for managing communications between the Project Company and its stakeholders. It seeks to define a technically and culturally appropriate approach to consultation and information disclosure; and it addresses in a structured way a need for various stakeholders being involved in Project development and operations.

Stakeholder engagement involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions (e.g. by way of meetings, surveys, interviews and/or focus groups), and ensures that this information is taken into consideration when making Project decisions.

SEP can improve Project Company’s decision-making and performance by:

- Cutting costs

Effective engagement can help avoid costs, while its absence can be costly both in terms of money and reputation;

- Managing risk

Engagement helps to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;

- Enhancing reputation

By publicly recognising human rights and committing to environmental protection, the Project Company and financial institutions involved in financing the project as well as can boost their credibility and minimise risks;

- Avoiding conflict

By understanding current and emerging issues such as tension around influx and employment opportunities;

- Improving corporate policy



Obtaining perceptions about the Project can act as a catalyst for changes and improvements in corporate practices and policies;

- Identifying, monitoring and reporting on impacts

Understanding the Project's impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and

- Managing stakeholder expectations

Consultation provides the opportunity to become aware of and manage stakeholder attitudes and expectations<sup>1</sup>.

Effective stakeholder engagement develops a "social licence" to operate throughout the life of the Project. The SEP helps to secure and maintain such licence which depends on mutual trust, respect and transparent communication between a company and Project's stakeholders.

The key objectives of the SEP can be summarised as follows:

- Understand the stakeholder engagement requirements of Ukrainian legislation;
- Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice;
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify the most effective methods and structures through which to disseminate Project information, and to ensure regular, accessible, transparent and appropriate consultation;
- Guide Project Company to build mutually respectful, beneficial and lasting relationships with stakeholders;
- Develop a stakeholder engagement process that provides stakeholders with an opportunity to influence the Project;
- Establish formal grievance/resolution mechanisms;
- Ensure that grievances from *Affected Communities* and external communications from other stakeholders are responded to and managed appropriately;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

### 1.3. Structure and Scope

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<sup>1</sup> The general idea is to ensure the Project Company's representatives do not make promises to stakeholders, but rather use the public consultation process as an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions which are feedback to the Project Company and other Project specialists.

In general, the *Stakeholder Engagement Plan* details the Project Company's activities related to engaging stakeholders in the process of Project development and making the most effective use of their participation.

It includes several sections relating to:

- *Regulation requirements* - which are summarising all (legal, regulatory, lender and Project Company) requirements pertaining to stakeholder engagement applicable to the Project.
- *Summary of previous stakeholder engagement activities* - which describes already conducted information disclosure, stakeholder consultation and engagement process for the Project.
- *Stakeholders identification and analysis* - which presents identified people, groups, and organisations that have or may have significant influence on Project direction and its success or who are significantly impacted by the Project.
- *Stakeholder Engagement Programme* - which outlines a systematic approach to inform and communicate with stakeholder, and presents identified strategies and tactics that will be used to achieve the greatest support of stakeholders and minimise resistance in a manner appropriate to the stakeholder's interest and involvement in the Project.
- *Grievance Mechanism* - developed to alert the Project Company in case of problems appearance.
- *Roles and Responsibilities* – assigned to manage stakeholder engagement and *Grievance Mechanism*.
- *Monitoring and Reporting Performance* - managed to monitor and periodically evaluate stakeholder engagement.

#### 1.4. Reference Documentation

##### Internal

- [1] EuroCape Code of Conduct
- [2] Environmental and Social Impact Assessment (ESIA)
- [3] Environmental and Social Management and Monitoring Plan (ESMMP)
- [4] Labour and Human Resources Management Plan (L&HRMP)

##### External

- [1] IFC 2012. Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts with Guidance Notes
- [2] IFC 2007. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets
- [3] IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (Guidance for Projects and Companies on designing grievance mechanisms), 2009
- [4] UNECE Aarhus Convention (approved by the Verhovna Rada of Ukraine by the law N 832-XIV of 06.07.1999)
- [5] The Law of Ukraine "On environmental protection" # 1264 dated 25 June 1991

- [6] The Ministry for Environmental Protection Order No. 168 dated 18.12.2003 “On procedure for participation of public in decision making process in the sphere of environmental protection”

## 2. Regulatory Requirements

### 2.1. National Requirements

As far as public participation in the decision-making process is concerned, Ukraine is a signatory to the UNECE Aarhus Convention (approved by the Verhovna Rada of Ukraine by the law N 832-XIV of 06.07.1999) and its provisions govern public consultation and disclosure of information.

High voltage transmission lines over 15 km of length are listed in Annex 1(17) of the Convention as objects that require compulsory public discussions of relevant environmental issues. Sector-specific regulations in Ukraine, such as the national Environmental Impact Assessment (EIA) standard, do not require such public participation in decision making with respect to power transmission lines or the wind farms. This fact represents a certain regulatory inconsistency between the national implementation conditions for the Aarhus Convention as a piece of framework legislation.

Nevertheless, the national environmental laws provide a firm legal ground for enforcement of the Convention principles in Ukraine. For instance, the *Law of Ukraine "On environmental protection"* ensures the right of public to discuss and put forward proposals in order to mitigate negative impact upon the environment, participate in public hearings and organise public environmental expertise, and if needed, turn to court for protection of their rights or for a failure of the state authorities and companies to act in compliance with the rules for environmental protection.

Following the Convention's ideology, the Ministry for Environmental Protection adopted Order No. 168 dated 18.12.2003 *on procedure for participation of public in decision making process in the sphere of environmental protection*. Therefore, the overall legal framework for public participation in decision-making process in environmental governance is fully enforceable in Ukraine. At the same time certain regulatory acts that refer to the lists of hazardous objects or establishing contents of construction project documentation need to be updated in order to ensure more efficient enforcement of the Aarhus Convention in Ukraine.

The Project has been a subject to Ukrainian environmental impact assessment as a function of building permit receipt, which EIA was successfully approved by the Ukrainian State Building Expertise department in Zaporizhia Region in September, 2015. At the time that EuroCape developed its *Urban Planning Verification* documents, which contain elements of an EIA, public consultations were required. This requirement has since then been removed from Ukrainian law. The need for formal public participation in the decision-making process or project evaluation now appears at the stage of the land zoning procedure, via a process/document called the *Detailed Plan of Territory*, which is essentially a district wide zoning/planning document.

### 2.2. IFC Requirements

This *Stakeholder Engagement Plan* has been produced in accordance with the performance standards required by the international financial institutions.

Following performance standards (in particular, IFC Performance Standard 1 *Assessment and Management of Environmental and Social Risks and Impacts*<sup>2</sup>), the SEP has been scaled to identify

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<sup>2</sup> IFC Performance Standard 1(IFC-PS1) *Assessment and Management of Environmental and Social Risks and Impacts* defines requirements for stakeholder engagement, depending on project risks, adverse impacts, and phase of development.

Project specific risks and impacts and has been tailored to the characteristics and interests of the *Affected Communities*.

Adapted by the Project Company key principles of an effective stakeholder engagement based on International Best Practice include the following<sup>3</sup>:

- Commitment - demonstrated when the need to understand, engage and identify the community is recognised and acted upon early in the process;
- Integrity - occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- Respect - created when the rights, cultural beliefs, values and interests of stakeholders and neighbouring communities are recognised;
- Transparency - demonstrated when community concerns are responded to in a timely, open and effective manner;
- Inclusiveness - achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- Trust - achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

Project Company commits to meet principles listed above during all Project lifetime.

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Where the project involves specifically identified physical elements, aspects, and facilities that are likely to generate risks or adverse impacts on Affected Communities, IFC-PS 1 includes requirements to expand external communications to include specific grievance mechanisms. These mechanisms serve to prevent and address community concerns, mitigate risk, and assist larger processes that create positive social change.

As it is indicated in IFC-PS 1: *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. The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project's risks and adverse impacts, and the project's phase of development.*

<sup>3</sup> IFC, 2007. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.

### 3. Summary of Previous Stakeholder Engagement Activities

Stakeholder engagement has been on-going process since 2008, and is planned to remain a core, imbedded and permanent part of the Project Company operations during the Project lifetime.

Due to the Project Company's commitment to "bottom up" development, EuroCape started consultations with administrative bodies at the village, district and regional level, institutional stakeholders (e.g. Ukrainian energy distribution company NEC UkrEnergo) as well as with the local society at a very early stage of Project development.

Previous stakeholder engagement activities undertaken by the Project Company to date has been summarised in the table below.

Table 1 Summary of previous stakeholder engagement activities

Timeline	Stakeholder Engagement activity	Objectives	Key Issues/Concerns raised and the Project Company response
2008 - 2009	Initial contacts and public consultations with the local stakeholders, established through the district administration and further managed by the Project Company (mostly oral discussions with Heads of Village Councils and District Administrations and Main Farmers. Public speeches also took place at the sessions of the Village Councils)	Planned investment with proposed location  (recognition of local community attitude, preliminary selection of possible location of the investment and further development of the cooperation)	<p>The initial proposal was that the Project Company focus on technical wind farm development and that the Priazovsk District by the Head of the Priazovsk District State Administration (PDSA) would support the Project Company in terms of local relations. The PDSA initially proposed that EuroCape develop a wind farm in three village councils: Dunaivka, Oleksandrivka and Stepanivka Persha.</p> <p>As the initial development strategy of outsourcing community relations to the PDSA did not go as well as the Project Company had hoped (it did not share the same vision for community engagement as the PDSA at the time) - the Project Company changed tactics and started (beginning from fall, 2009) managing community engagement itself, directly.</p> <p>The first decision that the Project Company took was that wind farm development would not be forced on communities that were not interested in the wind farm project and the potential for community development that it offered.</p> <p>As the Main Farmers from initially proposed village councils (Oleksandrivka and Stepanivka Persha) worried that the Project Company would pay salaries that were above market, therefore increasing salary costs to the Main Farmers, the Project Company decided to withdrawal from Oleksandrivka and Stepanivka Persha village councils, proposed cooperation and got the approval from the village councils of Devninskoe, Dobrivka and Girsivka.</p> <p>Finally, based on a voluntary participation, six village councils accepted development proposal - Dunaivka, Devninskoe, Dobrivka, Girsivka, Mordvynivka, Nadeshdine.</p>
2009 - 2017	Individual negotiations of rental conditions of plots designated for the location of the investment infrastructure	Land acquisition through voluntary transactions	<p>The Project Company implemented land acquisition based on the transparent negotiations with the land users/owners and offering fair prices, without the use of compulsory procedures.</p> <p>In 2010, EuroCape hired Nikolay Nikolaevich Kalyanov as its regional representative in Zaporizhia Region. Nikolay Nikolaevich is a former Head of the</p>

Timeline	Stakeholder Engagement activity	Objectives	Key Issues/Concerns raised and the Project Company response
			<p>Priazovsk District State Administration (17 years), a former Head of the Priazovsk District Parliament (5 years) and a former collective farm Director in Girsivka Village Council (8 years) and is one of the most highly respected civic leaders in Priazovsk District today.</p> <p>Since 2010, Nikolay Nikolaevich has led EuroCape's land acquisition effort specifically but also, more generally, been a guiding factor behind EuroCape's general community relations strategy.</p> <p>To support the tax and income base of its village council partners (100% of land rent in Ukraine stays at the village level), the Project Company took the decision to rent out much larger parcels of land than it actually needed, to maximally support the tax base of its village council partners.</p> <p>The Project Company has also already started land compensation process. Simple and universally applicable compensation scheme was worked out which is based on an area of affected land excluded from agricultural production, and a compensation rate greater per square meter than the net yield per crop per square meter.</p>
2010	Individual cooperation arrangements and agreements	Partnership build with Main Farmers	In an effort to build partnerships with Main Farmers operating within Dunaevka Village Council (the farming cooperative "Prilimansky") and in Nadeshdine Village Council (the farming company "Zoria"), the Project Company signed cooperation agreements, where each company pledged to support the other and to allow each other to mutually develop their businesses.
2009, 2010, 2014, 2018 (planned)	Wind farm study trips	To increase local understanding of what an international-class wind farm is actually	As the involved communities raised at the very beginning of the Project development concerns related environmental impacts generated by the wind farm, mainly noise and infrasound impact and shadow flicker, the Project Company launched a program of wind farm study trips, where they sponsored short trips to France for local representatives of the villages, districts, region and electricity grid who could visit a modern-class wind farms. The trips included approximately 15 invited guests, meetings with local farmers and commune administrators in France as well as ascents to wind turbine nacelles and visits to local grid connection points.



Timeline	Stakeholder Engagement activity	Objectives	Key Issues/Concerns raised and the Project Company response
			These trips were extremely helpful in alleviating unfounded rumours such as infra noise from a wind turbine would drive off mice, which would negatively impact farming operations and building positive attitude to the Project.
Since 2012, once every two years	Parties arranged by the Project Company for friends and partners, at the village, district and regional level (c.a. 100-125 participants)	To express a respect, strengthen partnership and interaction developed between the Project Company and its local partners	These regular events are treated by the project Company as a sign of the active, real and practical level of partnership and interaction that has developed between EuroCape and its local partners since 2009.
2010	Public Hearing (took place in the village of Nadeshdine)	To fulfill requirements of the administrative procedure related to <i>Urban Planning Verification</i>	<p>The hearing focused on the subject of the environmental impact of the planned wind farm and the discussion was divided into following categories:</p> <ul style="list-style-type: none"> <li>- List and description of the potential environmental impact sources and the possible borders of affected zones;</li> <li>- Noise impact;</li> <li>- Infrasound impact;</li> <li>- Vibration impact;</li> <li>- Impact on the ecological situation, flora and fauna of the adjacent territory;</li> <li>- Electromagnetic impact;</li> <li>- Impact on the soil and subsoil;</li> <li>- Impact on the water environment;</li> <li>- Impact on land management and life safety of the residents;</li> <li>- Influence on the social environment;</li> <li>- Impact on the landscape;</li> <li>- Impact on the protected archaeological territories;</li> <li>- Assessment of the wind farm impact on the air traffic.</li> </ul> <p>Representatives of the villages and administration at the village, district and region level, as well as members of the ornithological institute and other organisations in a number of approximately 60 people attended the event.</p> <p>After a project presentation by the Company, the other participants could present their opinions and express project related doubts and questions. In general, all speakers presented a very positive attitude to the Project.</p>
			<b>Meetings with authorities (district, regional and national level)</b>

Timeline	Stakeholder Engagement activity	Objectives	Key Issues/Concerns raised and the Project Company response
From 2009 till now	<p>Public consultations with the stakeholders, arranged by the Project Company.</p> <p>From fall, 2009, meetings have taken place regularly, both at the village, district, regional and national level.</p> <p>Since 2009, the Project Company executives have travelled to the wind farm development site anywhere from once/week to once every three weeks.</p> <p>Furthermore, the Project Company opened its offices in Kyiv (in spring, 2009), in Priazovsk settlement (2010) and in the city of Zaporizhia (2011), to support regional communication.</p>	To share Project specific information with the affected communities and other stakeholders or to fulfill formal requirements	<p>EuroCape typically meets with its local community counterparts at the director level, at the regional representative level and then very often involves senior management specialists such as its Project Managers or electrical engineering teams, as required.</p> <p>In addition to formal meetings at the regional, district or village level, communication between EuroCape and its local partners is routine, regular and constant. These communications take the form of written letters, e-mails, telephone conversations and informal meetings, either in the village council/district/regional offices, in EuroCape's offices in Priazovsk settlement or in EuroCape's offices in Zaporizhia or Kyiv. These meetings are usually working level and focused on issues such as land allocation, social infrastructure, land rent payment, decentralisation or other issues.</p>
			<p><b>Meetings with local societies (village level)</b></p> <p>The Project Company organised regular meetings of the entire village council on a regular basis.</p> <p>Formal meetings have taken place on average twice a year. Sometimes these meetings fulfilled formal requirements, such as approving the <i>Detailed Plan of the Territory</i>. More typically, these meetings were aimed at sharing information with the affected communities and involved a short initial presentation by the Project Company, usually starting with the wind farm development progress since the last meeting and then moving on to plans and timelines for next steps, followed by question/answer sessions and discussion.</p> <p>Another major topic of conversation usually revolves around jobs, specifically how many workplaces Project would deliver to local communities and when.</p> <p>Specific technical parameters for the wind farm have also been discussed such as:</p> <ul style="list-style-type: none"> <li>- The size of the farm, the number of wind turbines, the average dimensions/weight of the turbines, and the main components of the wind farm, i.e. Wind turbines, wind farm sub-station, high voltage transmission line, power cables between the wind turbines and the wind farm sub-station;</li> </ul>

Timeline	Stakeholder Engagement activity	Objectives	Key Issues/Concerns raised and the Project Company response
			<ul style="list-style-type: none"> <li>- The main design elements of the wind farm, i.e., location away from the Sea of Azov (&gt;20 kilometres), away from the Milk Estuary (minimum 2 kilometres) and away from the village boundaries (minimum 1,200 meters);</li> <li>- The cost of the wind farm project, as well as Company's obligation to rebuild public roads and agricultural hedgerows;</li> <li>- The various studies that are complete/underway, mainly: flicker/shadow, electromagnetic, infra noise, noise estimation, bird/bat, environmental due diligence;</li> <li>- Proposed social infrastructure investment via the signed investment agreement as well as future job options (quantity and type).</li> </ul> <p>As a result of regular meetings with affected communities, the <i>Social Infrastructure Support Program</i> has been developed and implemented by the Project Company (the planned timeline for the implementation of the Program is between 2009-2019), to establish mutually beneficial relations with its local community partners.</p> <p>The village council partners were concerned that if social infrastructure funds were first deployed at the regional level, then transferred down to the district level followed by the transfer down to the village level, that the original investment would be significantly reduced by the time the funds reached the village level. It was important to them to have direct contractual relations with the Project Company.</p> <p>Hence the Project Company made the commitment to directly deploy 50% of the social infrastructure funds at the village level and 50% of the social infrastructure funds at the district level.</p> <p>Suggestions for social infrastructure were proposed by a resolution of a village or district parliament and then approved by the Project Company, to make sure that each project would deliver a tangible, positive impact in terms of quality of life improvement to the citizens of the local community.</p> <p>Examples of social infrastructure investment chosen to develop or improve are: Purchase of ambulances for district and village hospitals; purchase of natural gas pipeline; renovation of village water system pipelines; replacement of water towers; renovation of community centres; renovation of a public library; Complete renovation of a kindergarten classroom, from class space, to sleeping space, to kitchen, bathroom and changing room space; kindergarten playground</p>

Timeline	Stakeholder Engagement activity	Objectives	Key Issues/Concerns raised and the Project Company response
			<p>and middle school gym equipment; middle school windows and heating installation; renovation of a village council building and two village medical clinics.</p> <p>Listed above social infrastructure development is typically also a topic for conversation, specifically past projects and future plans and timing.</p> <p>Each meeting held by the Project Company lasted about 60 minutes, with 30 minutes of presentation and then 30 minutes of question and answer.</p> <p>A summary of such meetings is provided in the following table.</p>

Table 2 Summary of the meetings with the village councils

	Frequency of meetings	Participants from the village council side	Number of attendees	Issues discussed	Project Company response
<b>Divninskoe</b>	5-6 times a year	Head of the village council - Sivun S.S. and deputies of the VC, villagers	15-30 people	Collaboration of the village council with the Company, investing in infrastructure, the prospect of Project development environmental issues	Confirmation of their proposal how to spend the Social Infrastructure Investment, which was proposed by people on the Village council session. Control and reporting of the Project Company about the infrastructure objects which had been funded.
<b>Nadeshdyne</b>	Every month	Head of the village council - Velchev S.F. and Golovenko S.V (LLC "Zorya"), Kyrlyuk T.A (secretary of the VC), deputies of the VC	8-10 people	Collaboration of the village council with the Company, investing in infrastructure, the prospect of Project development environmental issues	Confirmation of their proposal how to spend the Social Infrastructure Investment, which was proposed by people on the Village council session. Control and reporting of the Project Company about the infrastructure objects which had been funded.

	Frequency of meetings	Participants from the village council side	Number of attendees	Issues discussed	Project Company response
<b>Girsivka</b>	Every month	Head of the village council - Popova N.I. and, Bikhalo Y.Y. (farming "Bikhalo"), Migova O.I. (secretary of the VC), deputies of the VC	8-10 people	Collaboration of the village council with the Company, investing in infrastructure, the prospect of Project development environmental issues	Confirmation of their proposal how to spend the Social Infrastructure Investment, which was proposed by people on the Village council session. Control and reporting of the Project Company about the infrastructure objects which had been funded.
<b>Dunayivka</b>	4-5 times a year	Heads of institutions, organizations, deputies of the village council, members of the executive committee;	10-15 people; At public discussions 60-70 people	The location of the wind farm and environmental issues, investing in infrastructure	Confirmation of their proposal how to spend the Social Infrastructure Investment, which was proposed by people on the Village council session. Control and reporting of the Project Company about the infrastructure objects which had been funded.
<b>Mordvynivka</b>	Every month	Head of the village council Khishchenko O.V., deputies of the VC, villagers	5-10 people	Collaboration of the village council with the Company, investing in infrastructure	Confirmation of their proposal how to spend the Social Infrastructure Investment, which was proposed by people on the Village council session. Control and reporting of the Project Company about the infrastructure objects which had been funded.
<b>Dobrivka</b>	8-10 times a year	Head of the village council, deputies of the VC, villagers, Members of the executive committee, activists, farmers	From a VC of 15 to 60 people; from the company of 3 to 7 people	The impact on the environment, financing, timing of implementation, coordination, location of objects, development of the village, development of socio- economic programs, identification of priority funding objects, youth and sports support, recreation areas, etc.	Confirmation of their proposal how to spend the Social Infrastructure Investment, which was proposed by people on the Village council session. Control and reporting of the Project Company about the infrastructure objects which had been funded.
<b>Melitopol State District Council Pryazovsk State District Council</b>	Quarterly	Head of the District council, deputies of the DC, Members of the executive committee, activists, farmers	From a DC of 15 to 60 people; from the company of 3 to 7 people	The impact on the environment, financing, timing of implementation, coordination, location of objects, development of the village, development of socio- economic	Collaboration on investing into infrastructure of the District. Control and reporting of the Project Company about the infrastructure objects which had been funded.

	Frequency of meetings	Participants from the village council side	Number of attendees	Issues discussed	Project Company response
				programs, identification of priority funding objects, youth and sports support, recreation areas, etc.	

## 4. Stakeholder Identification and Analysis

At current phase of the Project development the Project Company has analysed and identified the following stakeholder groups:

- Affected (directly or indirectly) communities including:
  - Residents of places where investment works will be directly implemented;
  - Main land users of investment sites and local business owners in the area impacted by the investment;
  - Residents and institutions along transport routes during construction;
  - Vulnerable groups, especially: children from nearby houses, participating to the nearby schools exposed to the risk of traffic accidents involving construction vehicles; unemployed interested specifically in the opportunity of employment for the Project needs; elderly or those people with disabilities interested in or affected by the Project but having limited possibility to participate in the meetings regarding Project implementation; minority groups interested in or affected by the Project but with limited access to the information because of language barriers.
- Interested parties, such as:
  - NGOs and conservation organisations;
  - Scientific institutions;
  - Local press.
- Parties that may have the potential to influence Project, in particular:
  - Government officials and other administrative authorities;
  - Financing institutions;
  - Project personnel; and
  - Organisational stakeholders.

To assist with stakeholder identification detailed *Stakeholder Register* has been created (see [Appendix 1](#)), that divides stakeholders into separate stakeholder groups, listed above.

It must be noted that the list of stakeholders is likely to expand/change as the Project progresses to construction and farther to operation phase. As a rule, no willing stakeholder will be excluded from the process of engagement.

As the *Stakeholder Register* tends to be a “live” document it will be maintained and updated by the Project Company on a regular basis (as any change, a new stakeholder group appear).

Stakeholder analysis determined the likely relationship between stakeholders and the Project; and helped to identify the appropriate consultation methods for each stakeholder group during the life of the Project. Detailed information regarding optimal tools, approaches and media identified as the most appropriate for the particular group of stakeholders can be found in Section 5 *Stakeholder Engagement Programme*.

## 5. Stakeholder Engagement Programme

Project Company believes that effectively managed stakeholder engagement helps to increase the probability of project success by ensuring that stakeholders clearly understand the project goals, objectives, benefits, and risks.

The project team will be actively listening and soliciting input and feedback to make sure communications are being received and understood, and also to capture important information to help make adjustments and to respond to problem areas.

Stakeholder engagement planning is the process of developing appropriate management strategies to effectively engage stakeholders throughout the life cycle of the project, based on the analysis of their needs, interests and potential impact on project success. The key benefit of this process is that it provides a clear, actionable plan to interact with project stakeholders to support the Project's interests.

General assumption is that engagement should be directly proportional to impact and influence, and as the extent of impact of the Project on a stakeholder group increases, or the extent of influence of a particular stakeholder on the Project increases. Engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used and should proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups.

The level of engagement required for each stakeholder will vary over the course of the Project. For example, during the beginning stages of the Project, it was necessary to engage key stakeholders to be highly engaged, as highly engaged key stakeholders in the early stages of the project are pivotal for project kickoff, achieving staff buy-in and clearing obstacles. As the Project progresses, it is expected that the level of engagement will shift from key stakeholders to the broader project team and end-users.

The Project Company prefers regular, informal communication alongside and in combination with formal grievance mechanism (which will be communicated to the community in advance - before the communities start to experience impacts, so at least prior to the start of construction phase preparation works).

General Project Company strategy is to continue previous efforts regarding stakeholder engagement in Ukraine which means meeting with each village council twice a year alongside regular and informal communication with other stakeholders and institutions.

Consultation with organisational stakeholders will be conducted routinely on a day-to-day basis, following the responsibilities of the various Project Company organisational units as defined by the company organisational chart and internal rules of communication.

Consultations with the administrative stakeholders within the Project development period will follow the Project milestones, which are: the financial close, Project Phase I start of construction and Project phase I start of operation.

Consultations with the internal stakeholders will follow the current practice and at a later stage also distribution of Project related information via mass e-mails and by posting of the informational boards.



Table below presents a stakeholder analysis with respect to the appropriate levels of consultation for each of identified stakeholder group.

When deciding the frequency and the appropriate engagement technique used to consult stakeholders, four criteria has been considered:

- The extent of impact of the Project on the stakeholder group;
- The extent of influence of the stakeholder group on the Project;
- Main purpose for engaging with particular stakeholder group; and
- The culturally acceptable engagement techniques and information dissemination methods.

Table 3 Stakeholder group consultation methods with stakeholder engagement programme details

Stakeholder Group	Objective	Consultation Method	Responsibility	Timeframe
<b>Affected (directly or indirectly) communities</b>				
<b>Residents of places where investment works will be directly implemented</b>	<ul style="list-style-type: none"> <li>- To fulfil administrative procedures</li> <li>- To inform about current and planned Project activities, impact management measures including grievance mechanism</li> <li>- To discuss any issues of concern or employment opportunities</li> <li>- To gather opinions and views</li> <li>- To explain the construction (operation) process and its impacts as well as compensation measures; and how they are going to be executed</li> </ul>	<ul style="list-style-type: none"> <li>- Direct invitation for participants (by phone/fax/e-mail/text messaging)</li> <li>- Announcements on information boards in respective municipal buildings<sup>4</sup></li> <li>- Information in local media (local and regional newspapers, radio and TV announcements)<sup>5</sup></li> <li>- Information on the Project Company web page</li> <li>- Public meetings</li> </ul>	District Regional Authorities (in case of administrative procedures) Project Company	<p>Throughout the implementation of the Project</p> <p>- before Project milestones (start of construction, start of operation phase) and minimum once a year (yearly global meeting with most of the local stakeholder)</p> <p>Continuously during the Project lifetime as a part of fulfilling grievance mechanism responsibilities</p>
<b>Main land users of investment sites and local business owners in the area impacted by the investment</b>			District Regional Authorities (in case of administrative procedures) Project Company	<p>Throughout the implementation of the Project</p> <p>- before Project milestones (start of construction, start of operation phase) and minimum once a year (yearly global meeting with most of the local stakeholder)</p> <p>Continuously during the Project lifetime as a part of fulfilling grievance mechanism responsibilities</p>

<sup>4</sup> Grievance Mechanism was published in the Village Councils and Administrations buildings: Mordvinivka Village Council; Nove Village Council; Melitopol District Administration Council; Girsova Village Council; Dobrivka Village Council; Dunayevka Village Council; Divninske Village Council; Priazovsk District Administrations Council; Nadezhdine Village Council. In addition, information regarding Project is published in three Project Company offices located in Kyiv, -Zaporizhya and Pryazovske.

<sup>5</sup> For example, during the process of design and building permit application, information about EIA of Wind Farm has been published in local newspapers, i.e.: District newspaper for Priazovsk District - "Priazovska Nov" and District newspaper for Melitopol District - "Noviy Den".

Stakeholder Group	Objective	Consultation Method	Responsibility	Timeframe
<b>Residents and institutions along transport routes during construction</b>		<ul style="list-style-type: none"> <li>- Announcements on information boards in respective municipal buildings<sup>6</sup></li> <li>- Information in local media (local and regional newspapers, radio and TV announcements)<sup>7</sup></li> <li>- Information on the Project Company web page</li> <li>- Public meetings</li> </ul>	District Regional Authorities (in case of administrative procedures) Project Company Construction phase Contractors	Throughout the implementation of the Project - before Project milestones (start of construction, start of operation phase) and minimum twice a year.  Especially prior to the start of construction phase when site-specific Traffic Management Plan will be agreed with route details and detailed delivery time schedule  Continuously during the Project lifetime as a part of fulfilling grievance mechanism responsibilities
<b>Vulnerable groups</b>		<ul style="list-style-type: none"> <li>- Focus group meetings</li> <li>- In case of national minority presence - meetings organised with the assistance of the translator</li> <li>- In case of elderly or groups of people with disabilities - assisted transport to meeting will be assured</li> </ul>	Project Company	Throughout the implementation of the Project - before Project milestones (start of construction, start of operation phase) and minimum twice a year  In case of school children (identified as a one of vulnerable group) especially important prior to the start of construction phase when site-specific Traffic Management Plan will be agreed with route details and detailed delivery time schedule

<sup>6</sup> Grievance Mechanism was published in the Village Councils and Administrations buildings: Mordvinivka Village Council; Nove Village Council; Melitopol District Administration Council; Girsova Village Council; Dobrivka Village Council; Dunayevka Village Council; Divninske Village Council; Priazovsk District Administrations Council; Nadezhdine Village Council. In addition, information regarding Project is published in three Project Company offices located in Kyiv, -Zaporizhya and Pryazovske.

<sup>7</sup> For example, during the process of design and building permit application, information about EIA of Wind Farm has been published in local newspapers, i.e.: District newspaper for Priazovsk District - "Priazovska Nov" and District newspaper for Melitopol District - "Noviy Den".

Stakeholder Group	Objective	Consultation Method	Responsibility	Timeframe
				Continuously during the Project lifetime as a part of fulfilling grievance mechanism responsibilities
<b>Interested parties</b>				
<b>NGOs and conservation organisations</b>	<ul style="list-style-type: none"> <li>- To fulfil administrative procedures</li> <li>- To discuss any issues of concern</li> </ul>	<ul style="list-style-type: none"> <li>- Direct contact (by phone/fax/e-mail)</li> <li>- One-on-one interviews</li> <li>- Public meetings</li> </ul>	Project Company with the assistance of Contractors or external experts (when required)	<p>Mainly prior to the start of construction phase, during fulfilling requirements of administrative procedures and financial close (ESIA analysis)</p> <p>Continuously during the Project lifetime, e.g. as a part of grievance mechanism</p>
<b>Scientific institutions</b>	<ul style="list-style-type: none"> <li>- To consult Project's difficulties</li> </ul>	<ul style="list-style-type: none"> <li>- Direct contact (by phone/fax/e-mail)</li> <li>- One-on-one meetings</li> </ul>	Project Company	<p>Mainly prior to the start of construction phase, during fulfilling requirements of financial close (ESIA analysis)</p> <p>Continuously during the Project lifetime, e.g. when issues raised as a part of grievance mechanism, will require specialist investigations)</p>
<b>Local press</b>	<ul style="list-style-type: none"> <li>- To disseminate information regarding Project details</li> </ul>	<ul style="list-style-type: none"> <li>- Direct contact (by phone/fax/e-mail)</li> <li>- One-on-one meetings</li> <li>- Public meetings</li> </ul>	Project Company	<p>Continuously during the Project lifetime.</p> <p>In minimum before the start of construction works and operation phase</p>
<b>Parties that may have the potential to influence Project</b>				
<b>Government officials and other administrative authorities</b>	<ul style="list-style-type: none"> <li>- To fulfil administrative procedures</li> <li>- To discuss any issues of concern</li> </ul>	<ul style="list-style-type: none"> <li>- Direct contact (by phone/fax/e-mail/official correspondence)</li> <li>- Formal meetings</li> <li>- One-on-one meetings and consultations</li> </ul>	Project Company	Mainly prior to the start of construction phase, during administrative procedures

Stakeholder Group	Objective	Consultation Method	Responsibility	Timeframe
		<ul style="list-style-type: none"> <li>- Permitting procedures</li> </ul>		During construction and operation phase quarterly and every time when administrative authorities involvement will be required
<b>Financing institutions</b>	<ul style="list-style-type: none"> <li>- To fulfil co-financing requirements</li> <li>- To keep informed about the Project progress</li> </ul>	<ul style="list-style-type: none"> <li>- Direct contact (by phone/fax/e-mail/official correspondence)</li> <li>- Meetings</li> <li>- One-on-one meetings and consultations</li> </ul>	Project Company	<p>Continuously during the Project lifetime</p> <p>After the start of construction phase and continuously through the operation phase, minimum once a year</p>
<b>Project personnel</b>	<ul style="list-style-type: none"> <li>- To secure operational management information flow (regarding e.g.: current Project activities, company recruitment policies and procedures, health and safety procedures, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>- Contracts provisions</li> <li>- Workshops and trainings</li> <li>- Routine day-to-day contacts</li> <li>- Mass e-mails</li> <li>- Announcements on informational boards</li> <li>- Labour Grievance Procedure</li> <li>- Code of Conduct</li> </ul>	Project Company Contractors	<p>Upon the selection of subcontractors</p> <p>On-going process (day-to-day routine) during construction phase - weekly progress meetings, workshops, trainings, etc.</p>
<b>Organisational stakeholders</b>	<ul style="list-style-type: none"> <li>- To secure operational management information flow (regarding e.g.: current Project activities, company policies and procedures, health and safety procedures, etc.)</li> </ul> <p>In case of senior management (owner company)</p> <ul style="list-style-type: none"> <li>- To inform on Project progress</li> </ul>	<ul style="list-style-type: none"> <li>- Contracts provisions</li> <li>- Workshops and trainings</li> <li>- Routine day-to-day contacts</li> <li>- Mass e-mails</li> <li>- Announcements on informational boards</li> <li>- Labour Grievance Procedure</li> <li>- Code of Conduct</li> <li>- Project progress update meetings/calls and reports</li> </ul>	Project Company Contractors	<p>Upon the selection of subcontractors</p> <p>On-going process during construction and operation – coordination meetings</p>

Disclosure and consultation activities listed above will be designed along the following general principles:

- Consultation events and opportunities must be widely and proactively publicised, especially among project affected parties, at least 2-3 weeks prior to any meeting;
- The non-technical summary must be accessible prior to any event to ensure that people are informed of the assessment content and conclusions in advance of the meeting;
- The location, timing and other logistic issues of any meeting will be designed to maximise accessibility to Project affected stakeholders (especially important in case of assuring participation of vulnerable groups);
- Information presented will be clear and non-technical, and will be presented in the local language understood by those in the communities;
- Facilitation will be provided to ensure that stakeholders are able to raise their concerns; and
- Issues raised are answered at the meeting or actively followed up.

## 6. Grievance Mechanism

As a tool to collect and consider all comments and complaints associated with the Project, the Project Company developed a *Grievance Mechanism*.

The *Grievance Mechanism* is based on the following principles:

- Everybody who may be directly or indirectly affected by the Project has a right to submit his/her comments, doubts or complaints;
- Individuals who submit their comments or grievances have the right to request that their name be kept confidential;
- All grievances will be registered, acknowledged, categorised and investigated;
- Every possible effort will be made to resolve received grievances;
- Outcomes of the investigation process and resolution elaboration process shall be recorded and communicated in a timely manner to stakeholders.

The Public Relation Manager (supported by the administrative manager) has an overall responsibility for the implementation of the *Grievance Mechanism* and managing the grievance process while the Site Project (Operation) Manager is responsible for the final acceptance of the content of formal responses to complaints.

Since the Contractors may also be responsible for dealing with complaints regarding the scope of works conducted by them, the Project Company will monitor the way in which grievances are being handled by the Contractors and ensure they are properly addressed within deadlines specified above.

Table below presents grievance procedure (steps taken by the Project Company for receiving and handling any comment or complaint regarding Project).

Table 4 Procedure for grievance response

Id	Step	Description
1	Receiving a comment/ complaint	<p>Any person or organisation may send comments and/or complaints in person, by phone or via post or e-mail.</p> <p>A comment/complaint can be submitted to the Project Company in a number of ways:</p> <ul style="list-style-type: none"> <li>- During meetings held by the Project Company;</li> <li>- Through communication directly with management - for example a letter addressed to site management, or operational offices; by e-mail or by telephone; a complaint may be also submitted directly to the OPIC Office of Accountability; and</li> <li>- Through the Public Relation Manager.</li> </ul> <p>Contact details can be found in <a href="#">Appendix 2</a>.</p> <p>For the comment/grievance submission needs, the <i>Grievance Form</i> (in English, Ukrainian and Russian) has been developed and publicised on the Project Company's website - <a href="http://www.windparkzaporizhia.com/">http://www.windparkzaporizhia.com/</a>. It will also be available at the information points that has been set-up in all related village and district administration offices, by the start of construction works.</p> <p>A template of the <i>Grievance Form</i> is included in <a href="#">Appendix 3</a>.</p>

Id	Step	Description
		For comments that have been submitted informally, <b>the Public Relation Manager</b> will arrange for a meeting where the comment can be explained in full and written down on the <i>Grievance Form</i> .
2	Logging the comment/complaint	Once a comment/complaint has been received it must first be logged in a <i>Grievance Register</i> (see <a href="#">Appendix 4</a> ).
3	Categorising comment/complaint	<p>In order to determine the measures needed for review and investigation of received comment/complaint, the nature of the grievance should be analysed and established.</p> <p>As the degree of the review and investigation depends on the type of grievance and clarity of circumstances, grievances will be divided into several different categories, such as:</p> <ul style="list-style-type: none"> <li>- Relatively minor and one-time problems (Category 1) Minor, straightforward issues related e.g. to a complainant's requesting for information, which need only screening before proceeding to the next steps and be handled easily.</li> <li>- Relatively minor but repetitive problems (Category 2) Less clear, repetitive issues or group complaints which may need a more detailed review prior to action or more complex action to be taken to resolve issue.</li> <li>- Significant, larger problems (Category 3) More problematic issues which need escalating or a different than standard process for resolution.</li> <li>- Major claim, significant adverse impact on a larger group or several groups (Category 4); Complex issues involving more than one complainant which may need to seek advice internally and, in some cases, to turn to outside parties to help in the validation process.</li> <li>- Major allegations regarding policy or procedure (Category 5). Major break of commitments made by the Project Company which require involvement of the higher management.</li> </ul>
4	Providing the initial response	<p>The person/community/stakeholder that lodged the initial comment/complaint will then be contacted within 7 calendar days to acknowledge that the Project Company has logged the comment/complaint and provide feedback (this response will either accept or refute possible responsibility for the grievance).</p> <p>This notification will include details of the next steps for investigation of the grievance, including the person responsible for the case.</p>
5	Investigating the grievance	<p>The Project Company will aim to complete investigation within 21 calendar days of the grievance first being logged.</p> <p>Depending on the nature of the grievance, the approach and personnel involved in the investigation will vary, e.g. a complex problem may involve external experts (e.g. Legal Manager). Simple cases may be easier, and quicker to investigate.</p> <p>The Project Company will involve the complainant in this investigation, where possible, to ensure participation.</p> <p>The Project Company, through the Public Relation Manager supported by the administrative manager, will update the complainant on the progress of the investigation and the timeline for conclusion (whenever such request appears).</p>



Id	Step	Description
6	Concluding/resolving the grievance	<p>All comments and complaints will be responded within 21 days of the grievance first being logged, to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.</p> <p>In complicated cases or, if response during this period is unrealistic due to the complex nature of the complaint, notification about expected date of the response will be given within this period.</p> <p>General approach to grievance resolution includes proposing a solution 1) unilaterally (the Project Company proposes a solution); 2) bilaterally (the Project Company and the complainant reach a resolution through discussion or negotiation); 3) through a third party (either informally or formally through mediation); or 4) through traditional and customary practices.</p>
7	Taking further steps if the grievance remains open	<p>In cases when the complainant is not satisfied with the way his / her grievance has been responded to or handled and re-submits it, the Project Company will invite representatives of the relevant local community to participate in the process so that a mutually agreed solution is identified and implemented.</p> <p>At all times, complainants are also able to seek legal remedies in accordance with the Ukraine laws and regulations. It is the Project Company policy that it will not inhibit the complainant's recourse to legal action if grievances are not closed out to their satisfaction.</p>

As a rule, all claims from affected communities shall be accepted and no judgment made prior to investigation, even if complaints are minor. However, several types of claims deserve special consideration and possible redirection to other mechanisms:

- Complaints clearly not related to the Project.

As it is sometimes difficult to determine which issues are related to the Project and which are not. If in doubt, employees designated to receive grievances will accept the complaint and assess its legitimacy. Also making upfront agreements with communities as to which types of claims are and are not project-related should help avoid misunderstandings in individual cases.

- Complaints constituting criminal activity and violence.

In these cases, complainants will be referred to the formal justice system.

- Labor-related grievances.

Grievance Mechanism for the Project Company's employees has been formally codified and has already been implemented in the Project Company regular operations.

A separate, labour grievance mechanism will also be available for the Project Company's Contractors and will be set and made available for contracted workers, once they start works on the Project site. The labour grievance mechanism has been described in the *Labour and Human Resources Management Plan (L&HRMP)*.

- Commercial disputes.

Commercial matters shall be stipulated for in contractual agreements and issues will be resolved through a variety of commercial dispute resolution mechanisms or civil courts.

- Issues related to governmental policy and government institutions.

As it is not uncommon for communities to use company grievance mechanisms to bring complaints related to aspects of project implementation that are a responsibility of, and implemented by, public institutions and their officials - the Project Company expect that may face a dilemma regarding their role in solving issues between complainants and local authorities.

In order to avoid such problems, the Project Company is going to clearly communicate (at every opportunity) about the role, responsibilities, and limitations of Project Company mechanism.

Though, as governments may not have enough capacity (either resources or processes) to handle grievances, or they may be inaccessible to affected communities. At a minimum, such grievances can be captured through the company grievance mechanisms, then it will be chosen whether to pass the grievances along to authorities and let the communities know how to follow up. The Project Company will also make an effort to provide support or advice (whenever possible) to local authorities or devise a joint grievance mechanism in the case of complex issue.

However, the Project Company as a rule will refrain from a direct mediation role in community-authority negotiations, since conflicts of interest may arise. A monitoring role is considered as a better solution.

- Exaggerated or fabricated complaints.

Such complaints may be motivated by desire for monetary compensation<sup>8</sup> or political reasons. Individuals or groups may lodge complaints of an insubstantial nature or produce an excessive volume of complaints.

These claims can draw resources away from dealing with legitimate issues as they can be costly to investigate. Nevertheless, investigation into grievances will be taken by the Project Company, to ensure they have sufficient basis, which will protect both the complainants and the Project Company. In addition to assessment of the facts by the Project Company or independent third-party investigators, techniques for protection against such issues include robust socioeconomic baseline studies documenting current conditions, including photographs of landscape, properties, and so on); leaving no gaps in time before the actual Project start; and clear communication to communities on what is reasonable, through explicit criteria and expectations management.

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<sup>8</sup> Real-life examples of such claims include quickly switching to crops that promise higher compensation for loss of agricultural land, replanting unrooted trees from outside the project-affected area to claim compensation for clearing them, building temporary huts on the land to be taken over by project construction, letting livestock out on purpose, and claiming that uncultivated land is agricultural.

## 7. Disclosure and Dissemination of Information

Since Project start, the Project Company has followed the national rules of disclosure of information and international best practice in keeping the involved societies and responsible administrative stakeholders informed about the Project details (please see Section 3). The Company is committed to continuing the process of internal and external stakeholders' dialogue throughout the wind farm construction and, indeed, throughout the entire lifetime of the wind farm.

In order to create an effective tool for disclosure of project-related information to a wide group of people, including societies and NGOs, the Project Company has developed a web page: <http://www.windparkzaporizhia.com/>.

The following information will be posted (in English, in Ukrainian and in Russian) on the web page:

- Short non-technical description of the Project: location, total capacity, preliminary environmental constraints etc.;
- Non-technical summary of the Project Company's environmental and social commitments (mitigation and monitoring measures);
- Description of a grievance mechanism and contact details (with the summary of other important commitments included in SEP); and
- Other Project related information (e.g. information about any additional specialist studies undertaken and its results).

The web page will be updated on a regular basis and will be monitored for submissions.

Communication with the organisational stakeholders will be conducted following the existing routines and procedures that have been developed and refined over the course of nine years now.

The communication channels will comprise regular meetings, reporting and day-to-day exchange of information via personal, mail or telephone contacts at different organisational levels between the involved parties. Meetings may also be arranged on request as well as regularly scheduled.

Disclosure of information to the administrative stakeholders will be based on formal notifications, applications and reporting - as required by the national law, or on request. The competent authorities will be invited (as appropriate) for site visits and on-site clarifications of the Project or operations status or they will make inspections within their mandate, at their discretion.

For the current status of the Project Company development the existing routines of internal communication (i.e. personal exchange of information, internal notifications by e-mail etc.) appear to be sufficient and comprise the following:

- Distribution of periodical information on Project development status and later on the wind farm performance to all employees by e-mail, all company conference calls, in-person office meetings approximately once/quarter and then Corporate events, which include full staff meetings, 2-3 times per year;
- Posting of Project related information and later on the wind farm performance on informational boards place in the company headquarters and local offices.

The institutions involved in Project financing will be informed of the Project progress on an annual basis with expected annual inspection visits (or more frequently as required).

## 8. Roles and Responsibilities

As has been already indicated, The SEP is a “living” document that will be refined and modified throughout the life of the Project. During this iterative process the focus and scope of the SEP may shift somewhat in response to changing engagement needs and priorities for the Project.

The key elements to be considered when implementing stakeholder engagement during the Project’s life cycle are as follows:

- Maintain existing relations with stakeholders;
- Maintain Project Company’s social license to operate;
- Assist Project Company with implementing environmental and social management plans; and
- Assist Project Company with monitoring and managing environmental and social impacts.

This will be achieved through the process of establishing roles and responsibilities regarding SEP implementation.

The Project Company currently has the overall responsibility for stakeholder consultation and involvement. This SEP will be implemented by the employees of the Project Company and will be supported by all of the Company’s resources.

Table below outlines the key roles and associated responsibilities regarding stakeholder engagement management.

Table 5 Roles and Responsibilities

Role	Responsibility
<b>Project Company</b>	<p><b>Site Project (for construction phase)/Operation Manager</b> responsible for:</p> <ul style="list-style-type: none"> <li>- Codifying formally the Project’s <i>Grievance Mechanism</i></li> <li>- Implement stakeholder engagement strategy and oversee all community liaison related matters</li> <li>- Accept the content of formal responses to complaints</li> <li>- Periodically evaluate stakeholder engagement</li> </ul> <p><b>Public Relation Manager</b> responsible for:</p> <ul style="list-style-type: none"> <li>- Perform community engagement</li> <li>- Main point of contact for community level</li> <li>- Maintain clear community communication</li> <li>- Manage arising community matters</li> <li>- Implement the <i>Grievance Mechanism</i></li> <li>- Receive and handle comments/complaints and ensure they are correctly documented</li> <li>- Maintain the <i>Grievance Register</i> with the assistance of the administrative manager</li> <li>- Coordinate the investigation and response to grievances (liaise with the administrative manager to ensure that grievances are tracked, reported and responded to accordingly as necessary)</li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"><li>- Monitor the way in which grievances are being handled (including these handled by the Contractors) and ensure they are properly addressed within deadlines</li><li>- Monitor on an on-going basis and review of the effectiveness and efficacy of the <i>Grievance Mechanism</i></li><li>- Report to the Site Project/Operation Manager</li></ul>
<b>Contractors</b>	Responsible for: <ul style="list-style-type: none"><li>- Dealing with complaints regarding the scope of works conducted by them</li><li>- Disclosing a key information regarding the progress of works conducted by them and any inconvenience and difficulties that may be experienced by local communities</li></ul>
<b>All Project Company and Contractors on-site personnel</b>	Responsible for: <ul style="list-style-type: none"><li>- Reporting any comment, response or grievance</li></ul>

## 9. Monitoring and Reporting

### 9.1. Record Keeping

The Project Company will maintain a database and activity file detailing all public consultation, disclosure information and grievances collected throughout the Project, which will be available for public review on request.

All comment responses and, grievances are to be logged using the *Grievance Register* (included in [Appendix 4](#)). This includes details of the comments/grievance, the commenter/aggrieved, and ultimately the steps taken to resolve the grievance.

Copies of received grievances (*Grievance Forms*) with any accompanying documentation e.g. written statements, photographic evidence, or investigation reports are to be filed along with the grievance logs and copies will be kept on the Project Company ftp server.

Note:

- If it is a comment, the commented will receive a copy if he/she requests one;
- If it is a grievance, the aggrieved shall always receive a copy once complete for their own records.

A master database will be maintained by the Public Relation Manager supported by the administrative manager to record and track management of all comments and grievances and audited by the Site Project/Operation Manager. This will serve to help monitor and improve performance of the *Grievance Mechanism*.

### 9.2. Monitoring and Evaluation

Stakeholders engagement monitoring is the process of monitoring overall project stakeholder relationships and adjusting strategies and plans for engaging stakeholders. It involves collecting data, assessing the level of engagement and using insights from the data collection to adjust strategies and tactics for engaging effectively with stakeholders.

For the Project needs dedicated mechanisms has been developed to receive ongoing direct feedback from key stakeholders, including *Grievance Mechanism* procedure (see Section 6.1). Individual stakeholders will be encouraged to participate and to voice questions and concerns, with the most serious issues and concerns.

Monitoring of the stakeholders' engagement will include among others:

- Recording the number of grievances received, identified by their nature and categorised (e.g. repeating grievances, challenging grievances requiring additional resolve time due to the need to conduct additional analysis or actions);
- Registration of the response time as well as submission channel (website, EuroCape offices, administration, etc.);
- Recording the number of hits on the website to see if that is an effective tool for information-sharing;
- Maintaining meeting records, including number of attendees and issues discussed;

- Maintaining records of communications with administrative stakeholders;
- Maintaining records of queries from NGOs and academic institutions, and
- Other as relevant.

Stakeholder engagement should be periodically evaluated by senior responsible persons at Project Company, i.e. Site Project/Operation Manager, assisted by the Public Relation Manager with administrative manager. The following indicators will be used for evaluation:

- Level of understanding of the Project stakeholders;
- Annual grievances received and how they have been addressed; and
- Level of involvement of affected people in committees and joint activities and in the project itself.

### 9.3. Reporting

#### Monthly Reports

As it is vitally important for the Project Company to monitor the effectiveness of the comment response and, grievance mechanism, an appropriate measures/Key Performance Indicators (KPIs) will be implemented, which will include monthly reporting.

Public Relation Manager will prepare brief monthly reports on stakeholder engagement activities for the Site Project/Operation Manager, which include:

- Activities conducted during each month;
- Public outreach activities (meetings with stakeholders and newsletters);
- Entries to the *Grievance Register*;
- Number of grievances received, resolved and outstanding;
- Grievance's nature analysis and categorisation;
- New stakeholder groups (where relevant); and
- Plans for the next month and longer-term plans.

Monthly reports will be used to develop annual reports.

#### Annual Reports

The Project Company will develop annual environmental and social reports which will describe Project impacts, undertaken mitigation and enhancement activities and a summary of processed external grievances.

As part of the annual review/report, analysing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance mechanism. As a part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Grievance Mechanism is designed in this monitoring and review will help to improve effectiveness and stakeholder buy-in.

### Reporting to the Communities

The Project Company will provide the opportunity to report back to the communities on matters relating to:

- Progress on the ESMMP implementation;
- Progress on implementation of the mitigation measures;
- Main findings from the annual monitoring.

For such needs, the Project Company will use reporting methods such as:

- To report directly to stakeholder groups through the site public relation team;
- To publish reports and have them available on the Project's website.



## Appendix 1 Stakeholder Register

Stakeholders Group	Contact Details
<b>Affected (directly or indirectly) communities</b>	
<b>Residents of places where investment works will be implemented</b>	<p>The project is being developed in the Village Councils of:</p> <p><b>Dunaivka</b> The Village Council occupies territory of 7048 ha. Population of the Council is 504.</p> <p><b>Girsivka</b> The Village Council occupies territory of 8081 ha. The population of the village is 1045.</p> <p><b>Nadeshdine</b> The land occupied by the Village Council has an area of 6000 ha. The population of the village is 500.</p> <p><b>Mordvinivka</b> The Village Council occupies territory of 6550 ha which is inhabited by 1198 people.</p> <p><b>Devninskoye</b> The Village Council occupies an area of 4236 ha. Current population is 579.</p> <p><b>Dobrivka</b> The Village Council occupies an area of 4578 ha. Current population is 510.</p> <p><b>Nove</b> The Village Council occupies an area of 4723 ha. Currently it has approximately 2884 inhabitants.</p>
<b>Vulnerable groups</b>	<p>The vulnerable groups within the Project area of interest can be grouped into categories of elderly, youth, unemployed, minority group and those people with disabilities.</p> <p>Within the area directly impacted by the Project no vulnerable group has been identified. Organisations registered within Pryazovske District and Melitopol District are:</p> <p><b><u>Elderly and disabled:</u></b></p> <p><b>Pryazovske District</b></p> <p><b>Myloserdia Pryazovske Society for Disabled</b> Registration address: 35 Pokrovska Street, Pryazovske Urban-Type Settlement, Pryazovske District, Zaporizhia Region, 72401 Representative: Skuibida Antonina Anatoliivna</p> <p><b>Pryazovske District Organization for Veterans of Ukraine</b> Registration address: 4 Pushkina Street, Pryazovske Urban-Type Settlement, Pryazovske District, Zaporizhia Region, 72400 Representative: Kocheva Lidiia Leonidivna</p> <p><b>Druzhba Bulgarian District Culture and Education Society</b> Registration address: 31-B Pokrovska Street, Novovasylivka Urban-Type Settlement, Pryazovske District, Zaporizhia Region, 72420 Representative: Pietkov Mykola Mykolaiovych</p> <p><b>Vinok Druzhby Ukrainian National and Cultural Society Pryazovske District Public Organization</b> Registration address: 95-A Myru Street, Oleksandrivka Village, Pryazovske District, Zaporizhia Region, 72445 Representative: Bilokur Svitlana Fedorivna</p> <p><b>Melitopol District:</b></p> <p><b>Tavria Region Bulgarian Culture Support Fund Regional Public Organization</b> Registration address: 53 Frunze Street, city of Melitopol, Zaporizhia Region, 72312 Representative: Zheliev Serhii Semenovich</p> <p><b>Dzherelo Melitopol District Society for Disabled</b></p>

Stakeholders Group	Contact Details				
	<p>Registration address: 10 Mykhaila Hrushevskoho Street, city of Melitopol, Zaporizhia Region, 72312 Representative: Saryadi Viacheslav Mykolaiovych</p> <p><b>Local War Invalid Zaporizhia Regional Public Organization</b></p> <p>Registration address: 1, Krupska Street, city Melitopol, Zaporizhia Region, 72319 Representative: Riazhechkin Ihor Volodymyrovych</p> <p><b>Afghanistan Veterans and Peacekeeper Soldiers Melitopol Local Ukrainian Union Public Organization</b></p> <p>Registration address: 137 Hetmanska Street, city of Melitopol, Zaporizhia Region, 72319 Representative: Mozharovskyi Oleksii Leonidovych</p> <p><b>Melitopol District Organization for War and Labor Veterans, and Children of War Public Organization</b></p> <p>Registration address: 85 Lenina Street, city of Melitopol, Zaporizhia Region, 72312 Representative: Selezniova Tamara Dmytrivna</p> <p><b>Youth:</b></p>				
	<b>District</b>	<b>Name</b>	<b>Chairman \ Manager \ Director</b>	<b>Registered address</b>	<b>Contacts</b>
	Pryazovsk e	Demonstration Educational Institution Azymut Pryazovske Special-purpose Primary and Secondary School of Pryazovske Village Council in Zaporizhia Region	Svitlana Mykolaivna Samofalova	74 Gorkoho St., Pryazovske Urban Village, Pryazovske District, Zaporizhia Region, Ukraine 72401	tel. + 38 06133228706 priaonz@gmail.com
	Pryazovsk e	Divnynske Comprehensive Primary and Secondary School of Divnynske Village Council in Pryazovske District of Zaporizhia Region	Galyna Ivanivna Shylo	31 Shkilna St., Divnynske Village, Pryazovske District, Zaporizhia Region, Ukraine	tel. + 38 0612396124 divnaschool@meta.ua
	Pryazovsk e	Girsivka Comprehensive Primary and Secondary School of Girsivka Village Council in Zaporizhia Region	Nataliia Petrivna Dorol	56 Tsentralna St., Girsivka Village, Pryazovske District, Zaporizhia Region, Ukraine 72440	tel. + 38 (06133)93-2-19 girsskola@gmail.com
	Pryazovsk e	Nadezhdyne Educational Complex Comprehensive Primary and Secondary Educational Institution - Preschool Educational Institution of Girsivka Village Council in Zaporizhia Region	Tetiana Viktorivna Foss	65 Tsyhuliarova St., Nadezhdyne Village, Pryazovske District, Zaporizhia Region, Ukraine	tel. + 38 (06133)93-3-45 nadschool@ukr.net
	Pryazovsk e	Dunaivka Comprehensive Primary and Secondary School of Girsivka Village Council in Zaporizhia Region	Yurii Ivanovych Chekir	40 Shkilna St., Dunaivka Village, Pryazovske District, Zaporizhia Region, Ukraine	tel. + 38 061-33-91-4-40 dunaevkaschool@gmail.com

Stakeholders Group	Contact Details				
	Pryazovsk e	Department of Education, Youth and Sport of Pryazovske District Public Administration of Zaporizhia Region	Iryna Leonidivna Kuzminska	76 Gorkoho St., Pryazovske Urban Village, Zaporizhia Region, 72401	tel. + 38 (06133) 22301 pria.z.rvo@ukr.net
	Melitopol	Nove Comprehensive Primary School of Melitopol District Council in Zaporizhia Region	Zhanna Vasylivna Dmytruk	2/1 Prodolna St., Nove Village, Melitopol District, Zaporizhia Region, Ukraine	tel. + 38 (097)6218673 novensakaja1955@ukr.net
	Melitopol	Mordvynivka Comprehensive Primary and Secondary School of Melitopol District Council in Zaporizhia Region	Olha Mykolaivna Apienina	1/2 Tsentralna St., Mordvynivka Village, Melitopol District, Zaporizhia Region, Ukraine	tel. + 38 (0619)496548 mordvinovka.s@ukr.net
	Melitopol	Department of Education in Melitopol District Public Administration of Zaporizhia Region	Tetiana Mykolaivna Bezborodyk h	5 Ivana Aleksieieva St., Melitopol Town, Zaporizhia Region, 72319	tel. + 38 (0619) 431436 rvo-mrda@ukr.net
	<b>Job Centres:</b>				
	<b>District</b>	<b>Name</b>	<b>Chairman \ Manager \ Director</b>	<b>Registered address</b>	<b>Contacts</b>
	Pryazovsk e	Pryazovske District Job Centre	Tetiana Lvivna Zenkova	1 Likarniany Lane, Pryazovske Urban Village, Zaporizhia Region, 72401	tel. + 38 06133023839 prirncz@meta.ua
	Melitopol	Melitopol District Job Centre	Yurii Mykhailovych Onyshchenko	113C O. Gonchar St., Melitopol Town, 72313	tel. + 38 (06192) 5-80-32
<b>Main land users of investment sites</b>	<b>District</b>	<b>Village Council</b>	<b>Name</b>	<b>Contacts</b>	
		Pryazovske	Shyn Farm Enterprise	Pryazovske village, 7 Molodizhna str., Shyn Oleksandr Viktorovych Tel:+380679023610	
		Dunaivka	Agricultural Production Cooperative Prylymanskyyi	Dunaivka village, 5 Magistralna str., Chulakov Anatoliy Illich, Tel: +380677309720	
			ZDG Farm Enterprise	Dunaivka village, 79 Frunze str., Zagubypalets Dmitriy Grigorievich, Tel: +380966400753	

Stakeholders Group	Contact Details			
			Farm Enterprise Dunayivske	Dunaivka village 34 Frunze str., Korolenko Oleksandr Viktorovich Tel +380962847041
		Girsivka	Iskra LLC	Girsivka village, 50 Centrtalna str., Ormandy Piotr Grigorevich, Tel: +380966760887
			Bykhkalo Farm Enterprise	Girsivka village, 22 Gagarin str., Bykhkalo Yuri Yurievich, Tel: +380677385373
			Agricultural Multifunctional Cooperative Zlagoda	Mordvynivka village, 89 Gaglazina str., Chulakov Oleksandr Anatoliyovich Tel: +380971914028
		Nadezhdyne	Zoria LLC	Nadezhdyne village, 6 Shkilna str., Golovenko Sergiy Volodymyrovych, Tel: +380974972170
			Hranozan Farm Enterprise	Nadezhdyne village, 46 Gagarin str., Kostenko Oleksiy Mykolayovich, Tel: +380677316758
			Elf Farm Enterprise	Nadezhdyne village, 48 Gagarin str., Rud' Gennadiy Andriyovich Tel: +380979773501
			Aist Farm Enterprise	Nadezhdyne village, 48 Tsygulyarove str., Ivashko Oleksiy Stanislavovich Tel: +380613393336
			Private Person Arbadzhy Oleksandr Ivanovich	Nadezhdyne village, 86 Tsygulyarove str., Arbadzhy Oleksandr Ivanovich Tel: +380973323823
		Dobrivka	Dobrivka LLC	Dobrivka village, 3 Zarichna str., Landar Yuriy Volodymyrovych,

Stakeholders Group	Contact Details			
				Tel: (06133)25853
		Divnynske	Oleksandrivka LLC	Alexandrovka village, 5 Nasonova str., Levchenko Mykola Grygorovych, Tel: (06133)24859
	Melitopol	Mordvynivka	Agricultural Production Cooperative Prylymanskyi	Dunaivka village, 5 Magistralna str., Chulakov Anatoliy Illich, Tel: +380677309720
			Private Person Zhykh Volodymyr Mykhaylovych	Mordvynivka village, 29 Tsentralna str., Zhykh Volodymyr Mykhaylovych Tel: +380979301692
			Agricultural Multifunctional Cooperative Zlagoda	Mordvynivka village, 89 Gaglazina str., Chulakov Oleksandr Anatoliyovych Tel: +380971914028
		Nove	Dymura Private Enterprise	Danylo-Ivanivka village, 5 Sverdlova str., Dymura Mykola Ivanovych Tel: +380679720065
<b>Residents and institutions along transport routes during construction</b>	The approx. length of road is 37,07 km (Phase 1A+1B).			
	The main transport route into the Wind farm will be via Mordvinivka village council. Delivery of the wind turbines to the acceptance point north of the village has already been planned and a detailed transport plan has been prepared.			
	A baseline traffic noise study is already completed for the villages of Mordvinivka and Girsivka. The noise measurements which were conducted at three locations in both villages revealed, that the average noise level in working days during day hours in both villages are virtually the same (57 dB(A) and 58 dB(A) respectively), while during weekends are higher in Girsivka (64 dB(A)).			
	Respective average noise levels at night in Mordvinivka are similar to these during day hours, and amount 56 db(A) in workdays and 58 db(A) in weekends.			
	In Girsivka the average noise levels amounted 49 db(A) and 53 db(A) respectively. The maximum observed noise levels were between 67 db(A) (Girsivka, working days at night) and 82 (Girsivka, weekend day time).			
Each village will be marginally impacted when turbines are installed into their specific village council, on a temporary and one-time basis. This impact is not expected to be material as the majority of transport will take place on agricultural roads that will by-pass the village center.				
Construction transport will most likely influence stakeholders identified as “Residents of places where investment works will be implemented”.				
Interested parties				
National Park “Milk Estuary”	Priazovsk National Nature Park Ukraine, Zaporizhia Region, Melitopol city, 8 Marta Str., 6 Tel: 0619 44 8374 E-mail: priazovnpp@ukr.net			

Stakeholders Group	Contact Details
<b>NGOs – birdlife local and international associations</b>	<b>BirdLife International Ukrainian Society for Birds Protection</b> Post box 33, Kiyiv, 01103 Tel: +38 (044) 284 7131 E-mail: uspb@birdlife.org.ua
<b>Local ecological NGOs</b>	<i>None identified at current stage of the Project implementation.</i>
<b>Scientific organisations</b>	<b>Bogdan Khmelnytsky MSTU Melitpol</b> Hetmanska 20 Str. Melitopol', Zaporiz'ka obl. Ukrayina, 72312 Tel: (0619) 44-04-03 - Rector's Office Rectors office e-mail: E-mail: pk@mdpu.org.ua  <b>Azov and Black Sea Interdepartmental Ornithological Station at I.I. Shmalgauzen Zoology Institute of the National Academy of Sciences of Ukraine</b> I. I. Schmalhausen Institute of Zoology B. Khmelnytskogo, 15 Str. Kyiv, 01030, Ukraine Tel: (38 044) 235-10-70 Fax: (38 044) 234-15-69 E-mail: iz@izan.kiev.ua
<b>Local press</b>	<b>Priazovsk District</b> District newspaper "Priazovska Nov" 72401, Zaporizhia Region, Priazovske District, Priazovske town, Pokrovska Str., 32-A http: www.priaznov.com e-mail: priaznov@ukr.net Chief Editor: Leonid Timofeyev Telephone 06133-22388  <b>Melitopol District</b> District newspaper "Noviy Den`" 72401, Zaporizhia Region, Melitopol city, Grushevskogo Str., 21 http: www.noviden.org.ua e-mail: n63155@gmail.com Telephone 06192 63155 Chief Editor: Diliara Kudusova  MTV - Plus Television Company 70 B. Khmelnytskyi Ave, 1 Floor, Melitopol Town, 72311 tel. + 38 (0619) 43-11-07 (reception room, fax) Chief Editor: Oleh Shostak
<b>Government officials and other administrative authorities</b>	
<b>Ministry of Finance</b>	<b>Ministry of Finance of Ukraine</b>

Stakeholders Group	Contact Details
	01008, Grushevskogo 12/2 Street, Kyiv, Ukraine Tel: +38 (044) 206-59-48 E-mail: infomf@minfin.gov.ua; presa@minfin.gov.ua
<b>Ministry of Environment</b>	<b>Ministry of Environmental Protection</b> 35, Vasilya Lipkivs'kogo Street Kyiv, 03035U, Ukraine Tel: +38 (044) 206-1-00 Fax: +38 (044) 206-31-07 E-mail: gr_priem@menr.gov.ua
<b>Energy Regulatory Office</b>	<b>National Commission for Regulation of Energy and Public Utilities (NCREPU)</b> 03057 Smolensk 19 Str. Kyiv, Ukraine Tel: +38 (044) 204-48-27, 204-48-94 Fax: +38 (044) 277-30-47 E-mail: box@nerc.gov.ua
<b>State Labour Inspectorate</b>	<b>Main Directorate of State Labor Service of Ukraine in Zaporizhia Region</b> 25 Severnoe Shose, Tel: 34-92-89, 233-30-31
<b>State and County Construction Inspectorates</b>	<b>Zaporizhya Department of State Architectural and Construction Inspection UKRAINE</b> Zaporizhya, 4 Pushkina str, Tel: (061) 717-01-87
<b>Village Councils</b>	<b>Devninskoe</b> 25 Sverdlova str., Tel: 06133-96183/96160 Head: Syvun Sergiy Semenovych <b>Dobrivka</b> 32-A Novaya str., Tel: 06133-94118 Head: Bordug Anatoliy Sergiyovych <b>Dunaevka</b> 6 Magistralna str., Tel: 06133-91422 Head: Prodanov Alexandr Petrovich <b>Girsivka</b> 50 Centralna str., Tel: 06133-93236 Head: Popova Nataliya Ivanovna <b>Mordvinivka</b> 1-A Galgazina str., Tel: 0619-440182 Head: Hishchenko Olexandr Volodymyrovych <b>Nadeshdine</b> 3 Shkilna str., Tel: 06133-93322



Stakeholders Group	Contact Details
	<p>Head: Velchev Sergiy Fedorovich</p> <p><b>Nove (PTL only)</b></p> <p>1 Prodolna str.</p> <p>Tel: 44-06-72, 49-63-34, 49-63-31</p> <p>Head: Butenko Valentyn Viktorovich</p>
<b>District state administration</b>	<p><b>Priazovsk District State Administration</b></p> <p>72401, Zaporizhia Region,</p> <p>Priazovske town, Pokrovska Str., 31</p> <p>Tel: 06133 22600, 06133 22146, 06133 22824</p> <p>Chairman: Romanenko Natalia Anatolievna.</p> <p><b>Priazovsk District Council</b></p> <p>72401, Zaporizhia Region,</p> <p>Priazovske town, Pokrovska Str., 31</p> <p>Tel: 06133 23327</p> <p>E-mail: prz@priazovrada.gov.ua</p> <p>Head: Prokopenko Oleksandr Mykolayovich</p>
	<p><b>Melitopol District State Administration</b></p> <p>72319, Melitopol city,</p> <p>Ivan Alexeyev Str., 5</p> <p>E-mail: melrda@i.ua</p> <p>Chairman: Mangul Oleksandr Anatoliyovich</p> <p><b>Melitopol District Council</b></p> <p>72319, Melitopol city,</p> <p>Ivan Alexeyev Str., 5</p> <p>E-mail: mrr.gov@ukr.net</p> <p>Head: Mordik Oleksandr Mykolayovich</p>
	<p><b>Zaporizhia Region State Administration</b></p> <p>69107, Zaporozhye,</p> <p>Avenue Soborny, 164</p> <p>Tel: (061) 233 11 91 (061) 239 03 53</p> <p>Fax: (061) 224 61 23</p> <p>E-mail: adm@zoda.gov.ua</p> <p>Head: Brill Konstantin Ivanovich</p>
	<p><b>Subsidiary Company "Zaporozhye Oblavtodor" of Open Joint Stock Company "State Stock Company" Roads of Ukraine"</b></p> <p>69095, Zaporizhya city, Ukrayinska Str, 50</p> <p>E-mail: autodor@autodor.com.ua</p> <p>Director: Tkachenko Sergii Volodymyrovich 0612787-54-31</p> <p>RaiAvtoDor (District) Road Administration</p> <p><b>"Priasovsk Raiavtodor ", the Branch of Subsidiary Company "Zaporozhye Oblavtodor" of Open Joint Stock Company "State Stock Company" Roads of Ukraine"</b></p> <p>72401, Zaporizhia Region Priazovsk District,</p> <p>Priazovske town Skhidna Str, 31</p> <p>Director Shepel Viktor Oleksandrovich</p> <p><b>MELITOPOL RAIAVTODOR, the branch office of Subsidiary Company "Zaporozhye Oblavtodor" of Open Joint Stock Company "State Stock Company" Roads of Ukraine"</b></p>

Stakeholders Group	Contact Details
	<p>Zaporizhia Region, Melitopol District, Semenivka Village Pershotravneva Str., 57 Director: Veryovkin Victor Viktorovich</p>
<p><b>Transmission and Distribution System Operators</b></p>	<p><b>National level</b>  <b>NEK Ukrenergo</b>            Tel: +38 044 238-38-25            m. Kyiv, Str. Simon Petliura 25            E-mail: nec-kanc@ua.energy            For press:            Tel: +38 044 239 43 59            E-mail: press@ua.energy</p> <p><b>Super-regional level</b>  <b>Dnipro Energy System</b>            Zaporizhya, 2 Plotinna str.            Tel: +380 (612) 58-34-32            E-mail: press@dniproenergo.ua</p> <p><b>Regional electricity distributor</b>  <b>Zapoblenergo</b>            (regional electricity distributor that tributes electricity up to 150 kV)            Zaporizhya, 14 Stalevariv str.,            Tel: (061) 286-33-59; (061) 286-33-8</p>
<p><b>Energy Safety &amp; Supervision</b></p>	<p><b>EnergoNadzor</b>  <b>The Branch of State Energy Supervision Administration in Zaporizhian Region</b>            Zaporizhia city, Karierna Str., 1            Tel: +380612 584813            E-Mail: zgien1@rdc.dnepr.energy.gov.ua            Director Samoilenko Yurii Pavlovich</p>
<p><b>Land Resources</b></p>	<p><b>National, regional and district State Geodetics Cadastre</b>  <b>Zaporizhia Regional State Geodetics Cadastre Administration</b>            69095 Zaporizhia city, Ukrayinska Str., 50            Tel: 061 787 45 24            Director Dykobayeva Yana Volodymyrivna</p> <p><b>Melitopol District Geodetics Cadastre Administration</b>            Ukraine, 72312, Zaporizhia Region, Melitopol city, Beibulatova Str., 11            Tel: 0619 42-69-82            Director Chornobrivchenko Mykhailo Sergiyovich</p> <p><b>Priazovsk District Geodetics Cadastre Administration</b>            Ukraine, 72401, Zaporizhia Region,            Priazovske Town, Pushkina Str., 7            Tel: 061332 3315            Director Bordyuh Tetiana Viktorivna</p>
<p><b>Police</b></p>	<p><b>Main Department of National Police of Ukraine in Zaporizhya Region</b>            Zaporizhya, 29 Matrosova str.,            Tel: (061) 239-88-88            Fax (0612) 34-27-51</p>

Stakeholders Group	Contact Details
	<a href="http://www.zp.npu.gov.ua/ru/">http://www.zp.npu.gov.ua/ru/</a> E-mail: <a href="mailto:uvdzpua@mail.ru">uvdzpua@mail.ru</a>
<b>Fire brigades</b>	<p><b>Main Directorate of State Emergency Service of Ukraine in Zaporizhia Region</b>  Zaporizhya, 65 Fortechna str.  Tel: 061-787-94-00</p> <p><b>State Fire - Rescue Post DPRP-33 of Main Directorate of State Emergency Service of Ukraine in Zaporizhia Region,</b>  Priazovskoe, 1 Kalinin lane,  Tel: 061-332-24-43</p> <p><b>State Fire - Rescue Station DPRCh-10 of Main Directorate of State Emergency Service of Ukraine in Zaporizhia Region</b>  Melitopol, 12 Krupska str.,  Tel: 061-9438432</p> <p><b>State Fire - Rescue Station DPRCh-9 of Main Directorate of State</b>  <b>Emergency Service of Ukraine in Zaporizhia Region</b>  Melitopol, 4 Heroiv Stalingrady str.,  Tel: 061-925-30-59</p>
<b>Regional culture</b>	<p><b>Zaporizhian Society for Conservation of Historical and Cultural Monuments Zaporizhia Regional Public Organization</b>  Zaporizhya, 14 Lermontova str.  Tel: (0612) 33-32-66.</p> <p><b>Zaporizhian Regional Centre for Protection of Cultural Heritage Municipal Institution of Zaporizhia Regional Council</b>  Zaporizhya, 31 Chekistiv str.  Tel: 061-7645610</p> <p><b>Research Centre Enterprise Ukrainian Society for Conservation of Historical and Cultural Monuments Zaporizhian Regional Organization</b>  Zaporizhya, 21 Gliserna str., office 7,  Tel: 063-2709210  director Rossoha O.M.</p>
<b>District and regional architecture</b>	<p><b>Urban Development and Architecture Department of Pryazovske District Public Administration</b>  Priazovskoe, 31 Pokrovska str.,  Tel: 06133-22240</p> <p><b>Urban Development and Architecture Department of Melitopol District Public Administration</b>  Melitopol, 5 Ivan Alekseev str.  Tel: (06129)43-14-08</p>
<b>Regional and District Forrest Management</b>	<p><b>Regional and District Forrest Management</b>  <b>Zaporizhzhya Regional Forestry and Hunting Administration</b>  69104, Zaporizhia city, Chumachenka Str., 15 C  Tel: 0612951685  E-mail: <a href="mailto:zaples@ukr.net">zaples@ukr.net</a>  Director: Deputy Kobzar Volodimir Oleksandrovich</p> <p><b>State Enterprise "Melitopol Forestry and Hunting Establishment"</b>  72350, Zaporizhia Region.,</p>

Stakeholders Group	Contact Details
	Melitopol District, Myrne Town, 70 - Rokiv Zhovtnia Str., 4 Tel: 061949-47-22 E-mail: dp_mlmg@ukr.net Director: Polulikh Myron Semenovich
<b>Ukrainian State Building Expertize in Zaporizhia Region</b>	<b>UkrDerJBudExpertizeZap</b> <b>The Branch of State Enterprise " Ukrainian State Building Expertize" in Zaporizhian Region</b> Director Braun Yurii Davidovich Zaporizhia city, Peremogy Str., 42 Tel: 061224-06-70
<b>Regional and District Water Canal Management</b>	<b>Zaporizhia Regional Division of Water Resources</b> 105 Soborny Av., Zaporizhia, 69095 Ukraine, Phone/Fax: 62-41-94, E-mail: zovh@zp.ukrTel:net Head of Division: V.A.Shlyahovchuk <b>Melitopol District Water Management Department</b> Melitopol city, Geroyiv Stalingrada Str., 3-A Head of Department Slepkan Mykola Volodymyrovich Tel/Fax: 5-46-04
<b>Financing institutions</b>	
<b>International Finance Institutions</b>	<b>OPIC</b> 1100 New York Avenue, NW Washington, D.C. 20527, USA
<b>Project personnel</b>	
<b>Employees of the company and contractors of the civil works and electrical engineering works, including project design works and construction and construction supervision and wind farm operations</b>	Five tenders for Ukrainian sub-contractors, in the following construction areas: <ul style="list-style-type: none"> <li>- 330 kV PTL construction (towers and overhead power transmission line, 23 kilometers, 109 towers)</li> <li>- Wind farm sub-station and territory (both civil and electrical engineering works)</li> <li>- 35 kV medium-voltage, underground cable works (for 35kV line is 62,113m (only Phase 1A as the length for 1B still under calculation)</li> <li>- 62 Wind turbine foundation and pile works for Phase IA and IB</li> <li>- Access roads</li> </ul> Approximately 100 construction workers can be expected per 100 MW of the wind farm nominal capacity. These positions will range from highly skilled (crane operators, welders, civil engineers concrete workers, electricians, electrical engineers) to lower skilled (security, aggregate transport (sand, gravel). Lower skill laborers are readily available locally. The challenge will be identifying and hiring higher skilled laborers like electrical engineers. It is expected that about 75 Ukrainian employees will be employed full-time once the wind farm reaches full capacity. These employees will comprise the following skill-sets: <ul style="list-style-type: none"> <li>- electrical engineers to staff the wind farm sub-station, present 24/365</li> <li>- security personnel, both at the wind farm sub-station and mobile security patrols to patrol the wind farm</li> <li>- administrative and accounting staff (accountants, office managers)</li> <li>- facilities personnel to maintain the wind farm sub-station facilities</li> </ul> In addition to Project SPV staff, the wind turbine supplier will also staff out wind turbine technicians to maintain and repair the wind turbines year-round for 15 years.
<b>Organisational stakeholders</b>	
<b>LongWing Energy S.C.A.</b>	58 rue Charles Martel L-2134, Luxembourg

Stakeholders Group	Contact Details
<b>EuroCape New Energy</b>	25 Boulevard Albert I, MC-Monaco, 98000
<b>Construction companies</b>	<p><b>PBDI (Poland) – the general contractor for Wind farm construction.</b>  Hiring/utilizing both Polish and Ukrainian employees  Str. Wapienna 10, 87-100 Toruń  Tel: +48 56 612 25 10, +48 56 612 25 11  Fax: +48 56 612 25 12  <a href="mailto:sekretariat@pbdi.pl">sekretariat@pbdi.pl</a></p> <p><b>‘PRIAZOVSK RAIAGROBUD’,</b>  Priazovskoe, 121 Gorkiy str.,  tel:06133-22733,  Mob: +380676183022,  E-mail: agrostroi@inbox.ru  Director: Demidovskiy I.D.</p> <p><b>‘PERSPECTIVE’</b>  Priazovskoe, 26 Lenina str.,  Tel: +380676123376  Director: Vasylenko Nikolay</p> <p><b>‘SOLE PROPRIETORSHIP SRADNY’</b>  Priazovskoe, 107 Kirov str.,  Tel: +38 097 472 64 54  Director Suryadny O.T.</p> <p><b>CONSTRUCTION COMPANY ‘SEIM’</b>  Novoe Village, 1 Prodolna str.,  Tel: +38 0677046434  Director: Selukov O.M.</p>
<b>Equipment and materials suppliers</b>	<p><b>Wind turbines:</b>  <b>Vestas Central Europe Hamburg, Germany</b>  <b>Central Europe and Africa</b>  Christina Buttler  Head of External Communications  Vestas Central Europe  Tel: +49 160 90141736  E-mail: <a href="mailto:chbut@vestas.com">chbut@vestas.com</a>  <a href="http://www.vestas.com">www.vestas.com</a></p> <p><b>General Electric</b>  Holsterfeld 16 Str.,  48499 Salzbergen, Germany  Tel: +49 5971 9800  <a href="http://www.gewindenergy.com">www.gewindenergy.com</a></p> <p><b>Electrical engineering equipment:</b>  <b>ABB Poland</b>  Ukraine, Kyiv city, 2/1 M.Grinchenko str.,  Tel: +38044 495 22 11  <a href="http://www.abb.ua">www.abb.ua</a></p> <p><b>Cable equipment</b>  <b>NEXANS</b></p>

Stakeholders Group	Contact Details
	<p>Ukraine, Kyiv city, 3 Sholudenko str. BC “Kubik” office 216,  Tel: +38044 3792940,  mobile +38095 324 50 50  E-mail: Tatiana.serbina@nexans.com  Director: Serbina T.V.</p> <p><b>Cement</b>  Dyckerhoff Cement Ukraine  Ukraine, Kyiv, 26 Pyrohivskiy Shliakh str.  Tel: +38044 536 19 61  E-mail: info-ukraine@dyckerhoff.com  <a href="http://www.dyckerhoff.com.ua">http://www.dyckerhoff.com.ua</a></p> <p><b>Steel suppliers</b>  <b>ArcelorMittal</b>  Ukraine, Kryvyi Rig, 1 Kryvorozhstali str.,  Tel: +38067 564 96 36  Sales Specialist Korkishko S.A.  Sergey.korkishko@arcelormittal.com  <a href="http://www.arcelormittal.com">www.arcelormittal.com</a></p> <p><b>Aggregates (sand and gravel)</b>  <i>Local quarries that are still being identified.</i></p>
Transport companies	<p><b>Turbine transport</b>  <b>HOLLEMAN UKRAINE</b>  49000, Orlovskaya,  d.21 Street, Dnepropetrovsk, Ukraine,  Tel: +38 (067) 519 26 06  Fax: +380672366887  <a href="mailto:info@holleman.org.ua">info@holleman.org.ua</a></p>

## Appendix 2    Contact Details

EuroCape maintains offices in Kyiv, the city of Zaporizhia and Priazovsk Settlement and can be contacted as follows:

**LLC Eurocape Ukraine**

44 Shota Rustaveli St., Kyiv, 01023 Ukraine

Tel: +38.044. 290.2594

Fax: +38.044.299. 0477

E-mail: admin.windpark.zap@eurocape.eu

Web address: <http://www.windparkzaporizhia.com/>

**EuroCape New Energy Kyiv**

*Adrien Fouchet*

44 Shota Rustaveli St.,

Kyiv, 01023 Ukraine

Tel: +38.098.419.1118

E-Mail: admin.windpark.zap@eurocape.eu

Web address: [www.eurocape.eu](http://www.eurocape.eu)

**EuroCape New Energy Zaporizhia**

*Pavel Ivanovich KUKNO*

Profsoyuzov Square 5

Room 463

Zaporizhia, Ukraine, 69044

Tel: +38.061.239.1011

E-Mail: admin.windpark.zap@eurocape.eu

Web address: [www.eurocape.eu](http://www.eurocape.eu)

**EuroCape New Energy Priazovsk**

*Nikolay Nikolaevich KALAYANOV*

Gorky Street 101g, Office 10

Priazovsk Settlement, Priazvosk District

Zaporizhia Region, 72401

Tel: +38.061.332.2459

E-Mail: admin.windpark.zap@eurocape.eu

Web address: [www.eurocape.eu](http://www.eurocape.eu)

An interested party can also submit its comments or complaints directly to Company representatives via EuroCape's Group Headquarters in western Europe:



**EuroCape New Energy Malta***Bjorn MUMMENTHEY*

25 Boulevard Albert I  
MC-98000, Monaco

Tel: +377.935.05075

E-Mail: [info@eurocape.eu](mailto:info@eurocape.eu)

Web address: [www.eurocape.eu](http://www.eurocape.eu)

The contact may be made also via the village, district or regional authorities which are contacted by the Project Company on a regular (daily) basis.

## **Appendix 3    Grievance Form**

<b>Reference No:</b>	
<b>Full Name</b>	
<b>Contact Information</b> <i>Please mark how you wish to be contacted (post, e-mail, telephone)</i>	<input type="checkbox"/> <b>By Post:</b> Please provide mailing address: ..... ..... ..... <input type="checkbox"/> <b>By Telephone</b> ..... <input type="checkbox"/> <b>By E-mail</b> .....
<b>Preferred Language for Communication</b>	<input type="checkbox"/> <b>Russian</b> <input type="checkbox"/> <b>English</b> <input type="checkbox"/> <b>Ukrainian</b>
<b>Description of Incident or Grievance:</b> <i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
<b>Date of Incident/Grievance</b>	<input type="checkbox"/> <b>One-time incident/grievance</b> Date: ..... <input type="checkbox"/> <b>Happened more than once</b> How many times? ..... <input type="checkbox"/> <b>On-going (currently experiencing problem)</b>
<b>What would you like to see happen to resolve the problem?</b>	

Please return this form to:

LC Eurocape Ukraine

44 Shota Rustaveli St., Kyiv, 01023 Ukraine

admin.windpark.zap@eurocape.eu

Interactive Public Grievance Form is also available on the Project website:

<http://www.windparkzaporizhia.com/en/feedback.html>



### **Request Form for Affected Parties or Their Representatives**

*For each question, please select the appropriate answer or write your own answer in the space below. You may take as much space as you need for your response and you can import text into the space or attach a separate document.*

Are you the directly affected party in this request, or are you representing the affected party?

☐ Affected Party

☐ Representative

Do you wish that the Office of Accountability keep your identity confidential?

☐ Yes

☐ No

Please provide your contact details (name, address, e-mail address, and phone numbers). If you are acting as an authorized representative for the directly affected parties, please provide contact details for the parties and for yourself.

Please provide the location of OPIC-supported project about which you have concerns, a brief description of it, and (if known) the name of the company that owns or is otherwise associated with the project.

State the way in which you or the party you represent has been adversely affected by the environmental or social impacts of the project, or might be adversely affected in the future.

Please indicate what steps you have taken with other parties to resolve your concerns about the project, the outcomes of these steps, and why they are not satisfactory.

## **Appendix 4    Grievance Register**

Ref. No	Date of Registration	Full Name	Contact Details	Grievance Description	Grievance Category	Date of Grievance	Date of Incident	Expected Resolution	Action identified to resolve the grievance	Initial Response		Resolution			
-	[dd/mm/yy]	(Person/ Organisation)	(Post/Phone/Mail)	-		[dd/mm/yy]	(on-time/more than once/on-going)	-	-	Date	By whom	Nature of Resolution	Date	Resolved/ Addressed by	Is Compliant Satisfied (if no, why?)