



# Stakeholder Engagement Plan

## Spitalia Solar

Department: HSES  
Project: *Spitalia Solar 100 MW with tracker panels.*

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# 1 INTRODUCTION

The Spitalla Solar PV Project, with a capacity of up to 100 MW, is a project of Spitalla Solar Shpk, a company established by Voltalia, the project developer.

This Stakeholder Engagement plan (SEP) is a culmination of all engagement activities undertaken on this Project to date, with insight into future disclosure planning, monitoring and management. It should be noted that this SEP is intended to be a 'live' document that will be updated and refined throughout the Project's lifecycle.

## 1.1 The Project

The Project is located in the Spitalla area in the Durres district, in the cadastral zone no. 8517. The various project components will cover a collective area of 123 hectares.

A map of the Project layout is provided below.

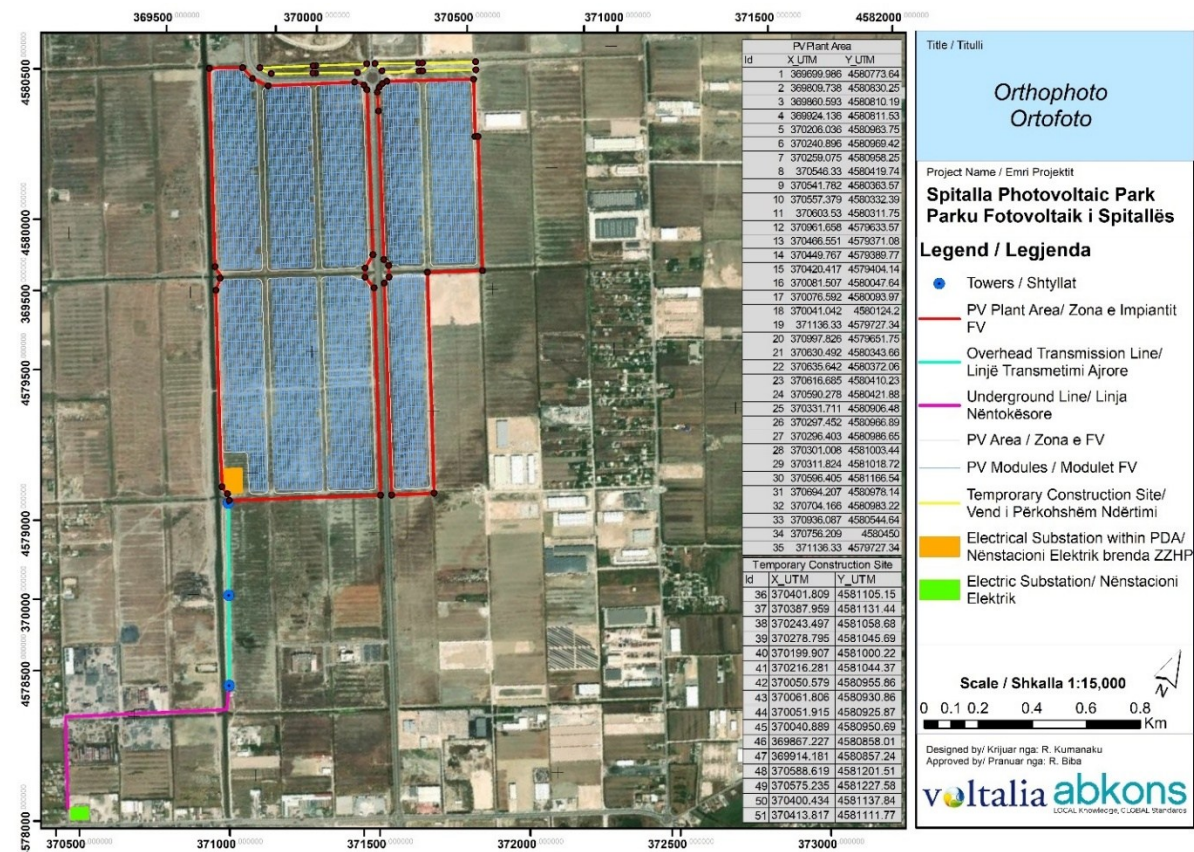


Figure 1: Proposed Plant

Project materials, such as solar panels, trackers, and other structures will be transported into Albania via Durres Port, located approximately 8 kilometers from the project site. Transport from the Port to the project site will use existing national roads and highways, following this route:

1. **Durres Port Road** (approximately 1.5 km), primarily used by heavy trucks;
2. **Durres–Tirana Highway** (approximately 2 km);
3. **Durres Ring Road** (approximately 5 km).

A visual presentation of the transport route is provide in Figure 2 below:



Figure 2: Project Transport Route

Given the adequate capacity and current use of these established transport routes, no specific community engagement activities are planned in relation to the transport of materials from Durres Port to PV site.

For the purposes of this Stakeholder Engagement Plan (SEP), the term "Project area" refers specifically to the physical footprint of the PV plant, including the construction site, internal access roads, transmission line (TL), and the electrical substation. Transport routes from Durres Port to the project site are not considered part of the Project Area and are therefore excluded from the engagement scope of this SEP.

## 1.2 The Potential Stakeholders

The closest community to the project area is Adriatik village at 600 meters away. Other nearby villages are Shenavlash and Spitalle, respectively within the AU (Administrative Unit) of Rrashbull and AU No. 4 of the city of Durres. Municipality of Durres is the primary institution responsible for managing infrastructure in the project area.

The project is located 7 km away from the Port of Durres and the Railway Station of Durres and 5 km from the Tirana-Durres highway. Situated between the highly industrialized area of Durres-Tirana, the site has been declared an Economic Region, indicating a high level of electric power consumption in the network for industrial, service and residential purposes. The area is also covered by a relatively high level of supply voltage and there are also lines dedicated to the Porto Romano substation and the residential area of the "Former Swamp of Spitalla".

Around the project area, numerous primary schools and the new campus of the University of Durres are present. During the Key Informant Interviews (KII) conducted as part of ESIA, it was reported that generally the schools were in very good condition.

Potable water for all plain areas in this territory is provided by the water distribution system from the Springs of Fushekuqe. The water supply is uninterrupted 24 hours a day, and the water quality was

reported in the survey to be good. The area was reported to be well covered by public services, according to the survey. With the presence of the University of Durres, public transportation is frequent in the area, connecting effectively with the city of Durres. Although a drainage system is present in the area, the irrigation system is entirely absent. Despite having a network of drainage channels, the area is often subject to flooding.

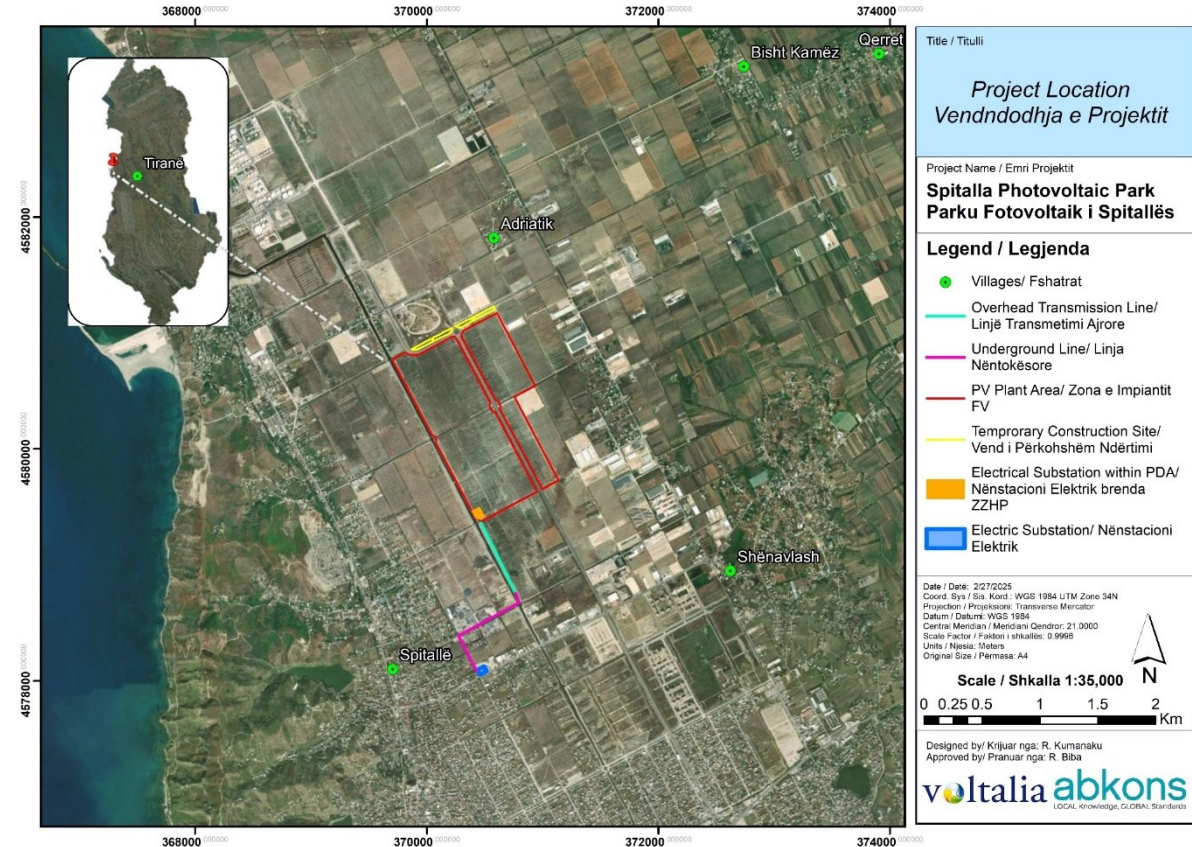


Figure 3: Proximity of Communities to the Project Location

The socio-economic conditions of the communities in the settlements of Shenavlash and Adriatik within the project area are shaped by a variety of factors, with the primary economic activity being animal husbandry, which accounts for roughly 50% of the area's economic output. Public sector employment follows as the second major economic activity, with agriculture and industrial employment coming after. The limited agricultural activities are primarily due to the absence of an irrigation system, which has led farmers to focus more on raising livestock.

Despite livestock farming being the dominant economic activity, it contributes to only 20% of family income due to high associated costs, fragmented land holdings, lack of irrigation, and the absence of nearby markets, which necessitate the transportation of products to the markets in the city of Durres using private means. The income from livestock typically comes from selling milk, meat, sheep, and eggs from chickens.

Unemployment in the area is notably high at 20%, exceeding the national rate of 11.7% in Albania. Remittances from working immigrants play a significant role in the local economy, accounting for nearly 40% of total family incomes.

Small-scale private enterprises, such as shops and mechanical workshops, are scattered throughout the area, although they are limited in number and size. Significant investments have been made in the garment manufacturing sector, employing a majority of women, while service-oriented businesses like restaurants and bars are fewer in number. Despite being near the sea, tourism is not a major economic

activity in the area, mainly due to the presence of the Porto Romano port, oil refineries, and the oil deposit in the vicinity.

The local business landscape consists mostly of medium and large enterprises, employing local residents, predominantly with high school education. While the businesses have seen a decline in market demand in recent years, recent improvements to the access road have alleviated some logistic challenges. The overall socio-economic profile of the area reflects a reliance on traditional industries, a notable dependency on external income sources, and a range of small enterprises with limited growth potential.

The project area extends into a territory almost devoid of any agricultural activity due to the dominance of clays and clay texture mixed with sea sands. Furthermore, the winter floods prompt a return to the semi-marcsy lands where Salicornia dominates, along with aquatic plants that resist the alternation of the water regime. Although the land was cultivated for a period of 30 years (1965-1990), the irrigation system is now completely destroyed.<sup>1</sup> The study area for the Spitalia Solar PV Project 100 MWp encompasses the area and people that may experience direct project impacts, that being the physical project footprint, effluents, and emissions.

The field survey was conducted on April 20, 2023, by an alternating group of environmental and social experts. The focus of the field survey was to characterize the human use of Ecosystem Services and the environmental process and functions necessary to sustain them. In this context, the first step was the identification of the ecosystem services potential in the study area of the Project. The field team observed the entire area of project development including the designated project site, access roads, TL, and Electrical Substation.

A supplementary field visit was carried out in 2025 to verify the accuracy and relevance of the baseline conditions described in the original assessment. The survey confirmed that the general environmental and socio-economic context of the area has remained largely unchanged. However, several additional elements were identified, including one case of grazing activity, a planted land plot within the PV plant boundaries, nearby private structures and businesses potentially affected by construction activities. These findings have been reflected in detail in the Project Social Impact Register (PSIR) and have been considered in the updated stakeholder engagement and impact mitigation planning, ensuring that potential disruptions are addressed and affected parties are informed and consulted in an adequate and timely manner.

### 1.3 Identified Social and Environmental Risks and Impacts

The table below provides a summary of impacts identified in the Environmental and Social Impact Assessment:

Table 1: Project Impacts Identified in Project ESIA<sup>2</sup>

PROJECT STAGE	CATEGORY	IMPACT	IMPACT MAGNITUDE
Construction	Air Quality	Dust generation	Moderate
Construction	Climate Change	CO <sub>2</sub> emissions	Negligible
Construction	Noise & Vibration	Disturbance to communities and project workers	Moderate
Construction	Geology & Soil	Construction activities, excavations, use and storage of fuels and chemicals, improper management of wastes	Minor

<sup>1</sup> Sulce&Beqiraj - Field Survey Datasheets\_Spitalle\_April20\_2023

<sup>2</sup> Project Environmental and Social Impact Assessment, Chapter 6

Construction	Water	Impact on irrigation and drainage patterns/networks, lands	Moderate
Construction	Wastes	Potential waste streams generation	Moderate
Construction	Habitats	Habitat loss and degradation	Moderate
Construction	Protected Areas	Damage to protected areas	Negligible
Construction	Flora	Loss of vegetation cover	Minor
Construction	Fauna	Changes in natural habitat	Moderate
Construction	Aquatic Ecology	alterations in the hydrology and surface water runoff regime	Minor
Construction	Economy and Employment	Demand for workforce, demand for goods and services	Minor to moderate positive
Construction	Land Use & Livelihoods	Land condition deterioration, reduced access, temporary lease	Minor
Construction	Health & Safety	Impacts on community and workforce	Moderate
Construction	Transport & Traffic	Increased traffic, accidents, infrastructure and services interruptions	Minor
Construction	Infrastructure & Community Services	Impacts on housing/dwellings, deterioration of road infrastructure	Minor
Construction	Landscape	Presence of Construction Machinery, vegetation removal	Moderate
Construction	Cultural Heritage	Disturbed cultural Heritage Monuments	Minor

## 1.4 Anticipating Stakeholder Engagement Needs in the Context of Social Risk Management

- 1) Quality - It is not sufficient simply to have a process in place; the quality and timing of the processes are critical. In fact, the quality may be more important to the success of stakeholder engagement than the quantity of financial resources allocated to it.
- 2) Early engagement - Early engagement provides a valuable opportunity to test and promote public perception and set a positive tone with stakeholders early on. It is also important to note that building sound relationships takes time.
- 3) Integration with design processes – There will often be elements of the project or programme design that will need the consultation and participation of external stakeholders. This aspect of stakeholder engagement needs to be properly integrated into project planning and scheduling.
- 4) Disadvantaged and vulnerable groups – Women, the disabled and ethnic minorities, for example, may be difficult to reach but can often be the stakeholders with the most to lose from a development project. Negative impacts on these groups (even if unintentional) can generate severe negative publicity over and above human costs.

- 5) Addressing key issues – Where communities have issues or concerns that are important to them, it is critical that these are addressed in the engagement process – even if these issues are difficult for Voltalia.
- 6) Failure to address serious concerns will compromise the stakeholder engagement process and cement negative perceptions of the project.

## 1.5 Voltalia's Approach

All strategic stakeholder engagement planning activities are based on an ongoing process of stakeholder identification, analysis and mapping to ensure that all relevant parties have been considered during the planning process. Voltalia implements an EBRD aligned scope to, *“At a minimum, carry out stakeholder identification, determine engagement and consultation requirements, and develop and implement a grievance mechanism. Further stakeholder engagement, will be undertaken, proportionate to the nature and scale of the project, its stakeholders and its potential environmental or social risks and impacts.”*

Key considerations within our overall approach to stakeholder engagement include:

- Identifying the environmental and social risks (highlighted in **Section 1.3** above).
- Demonstrate anticipated engagement needs in the context of the environmental and social risks identified (highlighted in **Section 1.4** above),
- Early consultation and the distribution of adequate and timely Project information to Project-affected people and other stakeholders,
- The provision of opportunities for all stakeholder groups to voice their opinions and concerns and the opportunity for these concerns to be both responded to and taken into account in Project planning decisions,
- The promotion of informed consultation and participation, allowing stakeholders to confirm a diversity of opinions in a suitable timeframe without forcing consensus,
- The verification of broad community support for the Project within the affected communities, and
- Accommodating for the needs of marginalised or vulnerable groups within the engagement process.
- Promoting the access of both internal stakeholders (that being, the Project's labour force), and external stakeholders (that being, communities and other interested and affected parties), to a fully functional and effective grievance redress management system.

The benefits of these approaches are that issues that may prevent the Project from proceeding are identified early in the Project lifecycle and have a greater chance of being managed throughout the ESIA and subsequent project construction. In addition, this approach will be more cost and time effective, aiming to prevent issues prior to their occurrence, and allowing the Project team to build a strong foundation to proactively manage successful stakeholder relationships and partnerships.

## 2 REGULATIONS AND REQUIREMENTS

This section provides a summary of legal, regulatory, lender, and company requirements pertaining to stakeholder engagement applicable to the Project. This includes public consultation and disclosure requirements related to the environmental and social assessment (ESIA) process.

## 2.1 Government Legislation

Albania has a comprehensive framework for Environmental Impact Assessment (EIA), primarily defined by the 2002 Law on Environmental Protection, which established the necessity for conduction of an EIA and obtaining an environmental permit prior to initiating a project. This law was later replaced by the Law No. 10431, dated 09.06.2011, titled "On Environmental Protection", which was further amended in 2013 and 2020 to align with EU directives and International best practices. This legislation sets forth the principles of environmental protection, institutional competencies, and the processes for EIA and environmental permitting.

The law No. 10440, on Environmental Impact Assessment, approved on 07.07.2011 and amended in 2015, 2020, and 2023 provides the core framework for EIA procedures, detailing project categories that require EIA, the roles of relevant institutions such as the National Environmental Agency (NEA) and the Ministry of Tourism and Environment (MTE), and the involvement of the public in decision-making.

Key regulations and directives that support the EIA process include:

- DCM No. 686 (29.07.2015), amended in 2018, 2019, and 2023, which outlines specific procedural rules, the structure of EIA report, the approval process, and monitoring requirements during the project.
- DCM No. 247 (30.04.2014), amended in 2023, defines public participation requirements in the environmental decision-making process, emphasizing the consultation of local communities and the need for a Stakeholder Engagement Plan (SEP) throughout the EIA process.

## 2.2 Aarhus Convention

As a Party to the Aarhus Convention, ratified through Law No. 8672, dated 26.10.2000, Albania is legally obliged to implement the Convention's three pillars:

- Access to Environmental Information;
- Public Participation in Environmental Decision-Making;
- Access to Justice in Environmental Matters.

These obligations are directly relevant to the project's environmental and social management processes, including:

- Provision of timely and accessible environmental information to stakeholders;
- Ensuring meaningful public participation in environmental decision-making, such as during ESIA procedures;
- Guaranteeing stakeholders' right to appeal or challenge decisions that may impact the environment, in accordance with national laws.

The project's stakeholder engagement activities, including public disclosure of environmental information and public consultation processes, are designed to comply with both national regulations and Albania's commitments under the Aarhus Convention.

## 2.3 Lender Requirements

The main international guidelines applicable to Stakeholder Engagement are the Equator Principles (EP) 4, the International Finance Corporation (IFC) Performance Standard (PS) 1 and the European Bank for Reconstruction and Development's (EBRD's) Environmental and Social Requirements for Stakeholder Engagement (ESR 10).

Principle 5 of the EP requires that, for all Category A and B Projects, the Project demonstrate effective stakeholder engagement, as an ongoing process in a structured and culturally appropriate manner, with affected communities, workers and, where relevant, other Stakeholders. All Projects affecting Indigenous Peoples will be subject to a process of Informed Consultation and Participation (IPC) and will need to comply with the rights and protections for Indigenous Peoples contained in national law and

international law. In this respect, IFC PS 7 is referred to in terms of the application of Free, Prior and Informed Consent (FPIC))<sup>3</sup>. ESIA documentation shall also be made readily available to the stakeholders.

The IFC PS 1 states that where the Developer has conducted an ESIA process, the Developer must publicly disclose the ESIA document. If communities may be affected by risks or adverse impacts from the project, the Developer must provide such stakeholders with access to information on the purpose, nature and scale of the project, the duration of proposed project activities, and any risks to and potential impacts on such communities. For projects with potential adverse social or environmental impacts, disclosure should occur early in the ESIA process and before the project construction commences, and on an on-going basis.

If affected communities are expected to be subject to risks or adverse impacts from a project, the Developer must undertake a process of consultation in a manner that provides the affected communities with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the client to consider and respond to them.

The IFC's Performance Standard 1 also states that effective consultation should:

- Be based on the prior disclosure of relevant and adequate information, including draft documents and plans
- Begin early in the ESIA process,
- Focus on the social and environmental risks and adverse impacts, and the proposed measures and actions to address these,
- Be conducted on an ongoing basis as risks and impacts arise,
- Be undertaken in a manner that is inclusive and culturally appropriate, and
- Be tailored to the language preferences of the affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups if applicable.

The consultation process must also ensure free, prior and informed consultation and facilitate informed participation. Informed participation involves organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the affected communities on matters that affect them directly, such as proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The Developer must document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected communities.

The IFC had, in 2018, published "*Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*" which has been consulted in developing Project strategies for Stakeholder Engagement.

PS1 requires the disclosure of relevant information access to relevant information on the purpose, nature, and scale of the project, the duration of proposed project activities, any risks to and potential impacts on such communities and relevant mitigation measures, the envisaged stakeholder engagement process, and the grievance mechanism.

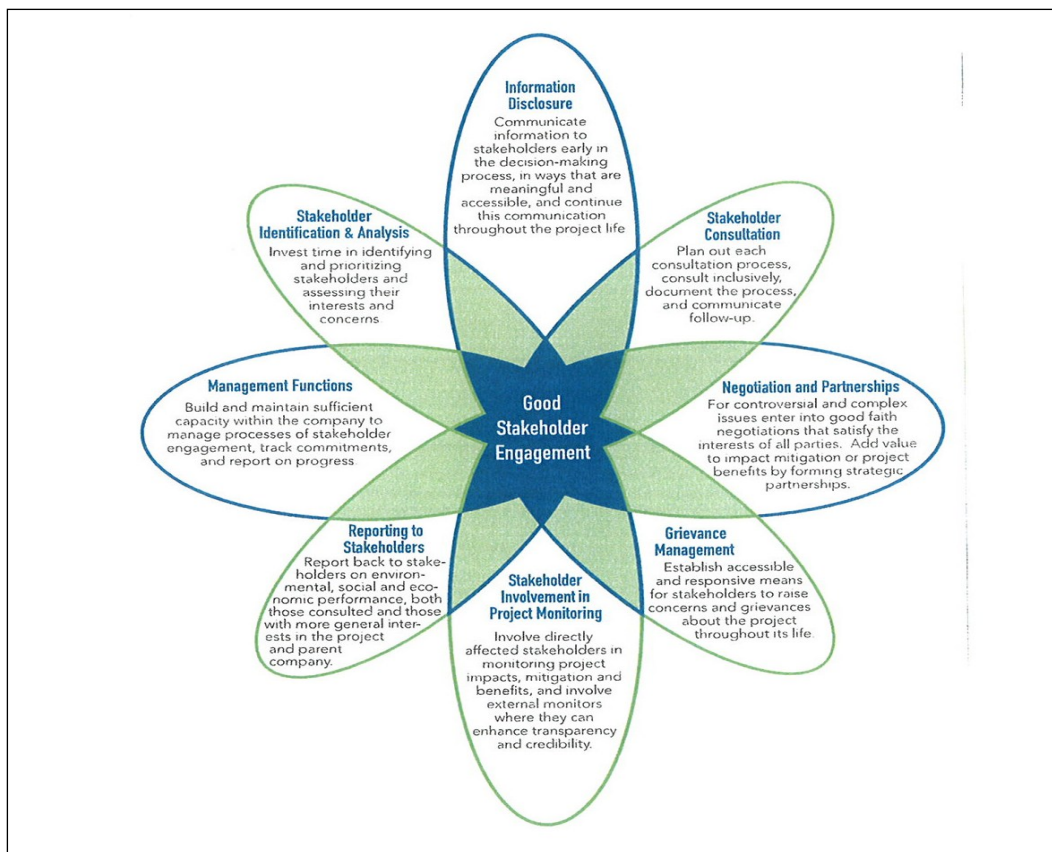
PS1 also requires the use of an effective grievance mechanism that can facilitate early indication of, and prompt remediation for those who believe that they have been harmed by Project.

IFC Performance Standard 4 on Community health, safety and security indicates that a project is expected to evaluate the risks and potential impacts to the health and safety of the affected communities during the Project life cycle and requires establishing preventive and controlling measures consistent with good international industry practice.

IFC Performance Standard (PS) 5 is on land acquisition and involuntary resettlement. It specifies that a Project is required to develop a resettlement plan so that physically or economically displaced individuals have their living conditions and livelihoods restored or improved. This is in tandem with the requirements of the World Bank’s Environmental and Social Standard (ESS) 5 on Land Acquisitions, Restrictions on Land Use and Involuntary Resettlement, which focuses on ensuring that a development project should not leave the people poorer than when it first commenced.

Aligned to the EBRD’s Environmental and Social Requirement (ESR) 10, this SEP seeks to fulfill all prescribed requirements, including the assurance of on-going reporting and feedback to relevant stakeholders, ensuring an engagement process that is gender responsive and inclusive of all relevant stakeholders, including vulnerable people and under-represented groups, and take appropriate measures to ensure the protection of personal data and the privacy of stakeholders.

The key components of good stakeholder engagement can be found in Figure 4 below. Each component of stakeholder engagement illustrated overlaps with the others, but each is critical in its own contribution to effective and sustainable engagement.



## 2.4 Voltalia Requirements

### 2.4.1 Voltalia's HSES Policy

Voltalia, in its fulfillment of its mission as a renewable power producer and services provider, considers that its business model requires the highest health, safety, environmental and social standards, essential for the success of the company.

The corporate HSES Policy was lastly updated in 16<sup>th</sup> of January 2025, by the Executive Committee with the commitment to seek continuous improvement of the Health, Safety and Environmental conditions and protection of Social performance. In its HSES Policy, Voltalia has committed that, when developing renewable energy projects, it will ensure incorporation of IFC performance standards regarding integrated Environmental & Social risks.

The HSES Policy can be accessed in **Appendix E** of the project's **Health, Safety, Environmental & Social Management Plan (HSESMP)**.

### 2.4.2 The Voltalia Engage Platform

Voltalia, in the quest to ensure consistent, tracked communication and grievances from both the labour force and community, has established the Engage Platform. The platform itself is accessed by designated Voltalia Project employees to either input information, glean statistical quantifications and track outstanding actions related to communications, disclosure and grievance resolutions.

"Engage" is designed to serve as the cornerstone of Voltalia's stakeholder and grievance management system, ensuring that our interactions with all parties are transparent, efficient, and accountable. It is our commitment to upholding the highest standards of corporate social responsibility and Engage reflects this by providing a centralized platform for managing relationships and addressing concerns. The system is integral to our compliance with the IFC's Performance Standards and EBRD Environmental and Social Requirements and other industry regulations, allowing us to monitor our performance and make informed decisions that align with our sustainability goals and ethical commitments.

Benefits of using Engage:

- Streamlined communication for quicker and more effective responses to stakeholder inquiries and grievances.
- Centralized data management to better track stakeholder interactions and grievance resolutions.
- Enhanced accountability and improved reputation management through transparent processes.
- Assistance in maintaining compliance with international standards, thereby reducing legal and reputational risks.
- Fosters stronger relationships with stakeholders through improved engagement strategies.
- Contribution to the long-term success and sustainability of renewable energy projects across the globe.

### 2.4.3 Whistleblowers System Procedure

Voltalia has in place a Company Whistleblowers Policy with a Whistleblowers System Procedure (document code: CPL-PRO-005-01-AA-EN). According to Voltalia's Ethics guide any violation including Gender Based Violence and Harassment (GBVH) in the project should be reported in the Whistleblower system: (<https://secure.ethicspoint.eu/domain/media/en/gui/106905/index.html>).

This is discussed further in **Section 6**, Grievance Redress Mechanism.

Any Voltalia employee and any third party may transmit an 'Alert' to the Deputy Managing Director, the Head of Human Resources and Corporate Functions or the Group Compliance Director, if the purpose of the Alert is to report one of the following elements:

- 1) A crime or offence.
- 2) A serious and obvious violation of the law or regulations,
- 3) Conduct or situations contrary to Voltalia's Code of Conduct on bribery and trading in influence.
- 4) A threat or serious harm to the public interest<sup>4</sup>.
- 5) The existence or realization of a risk of serious harm to human rights and fundamental freedoms, to the health and safety of individuals and to the environment. This risk of harm must result from the company's activities and those of the companies it controls, as well as from the activities of subcontractors or suppliers with which it has an established business relationship. A simple potential risk can thus be the subject of an alert.

Alerts are sent to: <https://secure.ethicspoint.eu/domain/medi/en/gui/106905/index.html>

A few points to note:

- 1) It is not an obligation, it is an option offered to all citizens to freely exercise their responsibility,
- 2) Ethical whistleblowing is based on two principles: defense of the public interest and proportionality,
- 3) The alert can be internal or external to the organization,
- 4) It must be possible to document it (writings, e-mails, interviews, witnesses), and
- 5) In the case of an alert made in the context of work, the protection of the employee guaranteed by law depends on compliance with a 3-stage reporting procedure (except in the case of serious and imminent danger or in the presence of a risk of irreversible damage).

## 3 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

### 3.1 ESIA Engagement and Disclosure

Stakeholder engagement is a critical component of the Environmental and Social Impact Assessment (ESIA) process and involves consultation and engagement activities with the full range of parties who may be affected by the Project, both during the Scoping and Impact assessment phases of the ESIA.

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<sup>4</sup> The subject of the Alert may also concern: - a serious and manifest violation of an international commitment regularly ratified or approved by France; - a serious and manifest violation of a unilateral act of an international organization taken on the basis of a duly ratified international commitment; or - a breach of the obligations defined by European regulations and by the monetary and financial code, or the general regulations of the Autorité des Marchés Financiers, and which are supervised by the Autorité des marchés financiers or the Autorité de contrôle prudentiel et de résolution.

The sub sections below are meant to show engagement activities performed during the Scoping and ESIA phases of the Project.

### 3.1.1 Engagement and Disclosure During ESIA study and Scoping Phase

As part of the ESIA and scoping exercise, several initial meetings have been hosted with relevant key stakeholders to introduce the Project and ascertain their preliminary perceptions of the project's disadvantages, benefits and perceived value-add. The Scoping report itself is a culmination of research (desk-based), the results of the meetings, and expert recommendation, all of which directed the scope of the ESIA. The Project scoping had adhered to the concept of 'informed consultation and disclosure,' as is evidenced in the number and range of meetings undertaken the early stage of the Project.

The initial meetings with key stakeholders groups identified were undertaken between September 20<sup>th</sup> and October 7<sup>th</sup> 2021. Invitations to stakeholders were sent via invitation letters and emails designed for stakeholder meetings to introduce the proposed project and invitation for participation. The meetings were attended by 53 officials from national, regional and local authorities, as well as National NGOs. At these meetings, the oral and visual presentation of the proposed project in Albanian language was presented by Voltalia.

The draft scoping report was accessible to stakeholders through the project website for comments and suggestions for a 30-day period, from January 13<sup>th</sup> to February 12<sup>th</sup>, 2023. Stakeholders were notified through email about the publication and invited to submit their comments on the Scoping Report. The Scoping Report was made available on the project website and officially delivered to each Administrative Unit<sup>5</sup> (AU) crossed by the project.

A summary of all meetings, including meeting objectives and outcomes, are highlighted in **Table 2** below, with meeting records found in **Appendix A**. In this table, participant stakeholders are organized according to group representation, those being, Government ministries, department and agencies (including parastatals); non-governmental organizations; community groups, leaders and organizations (including co-operatives) and business (formal and informal).

The objective at these meetings was to present the proposed project and allow the stakeholders the opportunity to make questions, suggestions and raise concerns. The meetings were conducted in the Albanian language.

The most pertinent points raised for discussion at each group meeting is captured below.

#### **Government Ministries, departments and agencies**

Discussions revolved around the environmental impact of the project, including seismicity, flooding and the potential effects on local heritage and surrounding communities. Discussion points stressed collectively by various stakeholders included the proximity of the project to protected areas, the management of flooding, and the treatment of photovoltaic panels at the end of their lifecycle, with the need for in-depth studies and alignment with international standards being the items consistently raised. The stakeholders that proved to be more vocal on these points were the National Agency for the Protected Areas (NAPA), the Ministry of Infrastructure and Energy (MIE), and the National Environment Agency (NEA). Overall, the outcome of meetings was favourable, with Voltalia committing to further

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<sup>5</sup> Administrative Units are sub-divisions of Municipalities. They are led by an Administrator appointed by the Mayor. An administrative unit in rural areas is usually composed of several villages.

consultations with the Regional Administration of Protected Areas, taking into account seismicity and flooding in their studies and coordinating with MIE on how to compensate for the land in which the Highway is located, nearly 10 Ha.

Voltalia follow up action included delivering the finalized Scoping Report and ESIA draft to the relevant institutions, ensuring proper alignment with best international standards, and addressing concerns regarding treatment of photovoltaic panels and the project's harmonization with nearby urban and environmental developments.

### **Non-governmental organisations**

Discussions revolved around the environmental impacts of the project, including the protection of local fauna, particularly avifauna. Discussion points stressed collectively by various stakeholders included the presence of specific bird species, especially mud birds, that use the area during the rainy periods, and the area's proximity to the migratory Adriatic corridor, which is crossed by migratory birds and used as a stopover. The concerns raised also emphasized the importance of avoiding the use of hazardous cleaning products for the panels and the need to minimize any potential environmental impacts. Migratory bird routes and specific species like the Sea Swallow (*Larola Praticola*) were consistently mentioned, along with the need for ongoing observation of these routes. Overall, the outcome of meetings was favourable, with Voltalia committing to conduct studies on local bird species, avoid using hazardous cleaning products for the panels, and continue to monitor migratory bird routes in the project area.

Voltalia follow up action included delivering the finalized Scoping Report and ESIA draft to relevant institutions, ensuring the bird species surveys were conducted, taking into account the concerns of NGOs regarding fauna, and allowing for comments and suggestions to be made once the Scoping Report is published and during future phases of the project.

### **Community groups, leaders and organisations (including co-operatives)**

Discussion/s revolved around the development of the area and the potential benefits for local employment. Discussion points stressed by Head of Villages of Rinia and Vrinias included the land's current condition, being mostly saline with no use from local farmers, and the opportunity for the project to make social investments or infrastructure development, with the employment of locals being a priority. Overall, the outcome of meetings was favourable, with Voltalia considering to provide employment opportunities for the locals.

Table 2: Summary of Stakeholder Meetings

NO.	ORGANIZATION	MEETING DATE	MEETING OBJECTIVE AND OUTCOME
<b>Government ministries, departments and agencies (including parastatals)</b>			
1.	Ministry of Infrastructure and Energy (MEI)	20/09/2021	Ministry of Infrastructure and Energy has granted the total land surface where the PV Plant will be located.
2.	Regional Agency of Protected Areas (RAPA)	27/09/2021	Project was presented to director of RAPA and potential impacts on protected areas were discussed. It was concluded the project will not have an impact on protected areas.
3.	National Territory Planning Agency	21/09/2021	Project information was shared, and queries were made about specific studies and considerations such as seismic activity of the area, flooding risk, safety risk etc.
4.	Drainage Board, Durres	24/09/2021	Drainage and irrigation channels in the area are very important to prevent floodings and should be preserved during construction and operation.

			Project responded that all the channels in the area will be part of assessment studies and mitigation measures will be proposed.
5.	Ministry of Agriculture	20/09/2021	<p>In general, participants suggested that the irrigation system should also be considered as it may be of subsequent interest to restore the function of the land (as agricultural land). The distance from the main canal should be 8m.</p> <p>Was also suggested to get a confirmation of land ownership in the project area.</p> <p>Project responded that all the channels in the area will be part of assessment studies and mitigation measures will be proposed.</p>
6.	Durres District Council	23/09/2021	<p>Project information was shared.</p> <p>Queries were made about measures to avoid flooding, impacts on birds, and project positive impacts.</p>
7.	Prefecture of Durres Region	23/09/2021	<p>It was suggested that an emergency plan should be considered and the prefecture can provide suggestions for technical security. The maintenance plan of photovoltaic panels should also be provided.</p>
8.	Transmission System Operator	22/09/2021	<p>Questions/Issues were raised during the meeting;</p> <ul style="list-style-type: none"> <li>• The project shall take into account the possible impact of the Electromagnetic field of the Overhead line and to respect the distances of the possible receptors.</li> <li>• The Project should take into account the new residential area near the Project area that might lead to a change of route due to its development. Coordination with Ministry responsible for the Reconstruction area is needed.</li> <li>• The study should check the distance of the Overhead line from the Highway that is being constructed in the area, in order to avoid possible overlapping of the OHL with the national Highway.</li> <li>• The design should take into account possible impacts to the receptors in the area and check other possible routes that create less impact on these receptors.</li> </ul>
9.	National Institute of Cultural Heritage	22/09/2021	<p>The director of the institution pointed out that preliminary studies have to be developed in the Project Area to assess the possibility of archaeological finds in the area.</p> <p>If any preliminary finds are found, this has to be reported back to the Institute and to the Ministry, in order to take possible mitigation measures or to make changes to the project design.</p> <p>There are some known archaeological sites near the project area, although no findings have been reported near the PV Plant.</p>
10.	National Environmental Agency	22/09/2021	<p>The representative of the agency stressed that according to the evaluation of NEA, the Project should undergo an in-depth ESIA study, since the nearby area is foreseen to be developed with residential buildings, there's also the Eco Park being constructed, and the reconstruction area (from the earthquake) that will be developed in close distance to</p>

			the PV site. According to him, the new PV solar plant in Spitalla may provide additional impacts (cumulative) in the area, since these other projects are being or will be implemented in parallel.
11.	Durres Municipality	23/09/2021	<p>The following questions/concerns were raised in the meeting:</p> <ul style="list-style-type: none"> <li>• In general, participants highlighted that the expropriation of local residents, on whose lands the electricity line poles will be placed should be considered.</li> <li>• It should also be taken into account that an existing power line extends along the national road.</li> <li>• Possible environmental and social impacts should be taken into consideration during the studies.</li> <li>• The area will also see the development of the new Industrial Port of Durrës and of a residential area, so the project should take into account the cumulative impacts with these projects and the coordination between various stakeholders in their development.</li> <li>• The Project will be strongly supported by the Municipality during all phases.</li> </ul>

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***Non-governmental organisations***

12.	Albanian Ornithological Society	07/10/2021	<p>Concern about fauna avifauna, there are specific birds that use these areas, especially some mud birds that in the rainy periods are active in similar areas. In addition, the area is near the migratory Adriatic corridor, crossed by the migratory birds and used as stop-over by birds. On the other hand, there are also the so-called ground species. So, studies should be undertaken given the fact that we are in a preliminary phase of the project study, and to start the survey of specific bird breeds, like the Sea swallow (Larola Praticola).</p> <p>There is also a risk of collision of birds with the overhead transmission line</p> <p>Project responded that The ESIA studies will provide baseline information and assessment of impacts and the studies will be undertaken in different seasons of the year Mitigation measures will be provided for all wildlife in the area and on biodiversity and flora and fauna aspects. Monitoring will continue also during construction and operation phases of the project.</p> <p>Bird diverters will be installed by Voltalia in order to minimize or avoid collision of birds with the TL.</p>
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***Community groups, leaders and organisations (including co-operatives)***

13.	Administrative Units of Rashbull and Katund i Ri	24/09/2021	<p>Project information was shared. Representative of institutions asked about the potential impact of the project in the temperature of the area, and the potential positive impacts of the project.</p> <p>Project responded that no big impacts on temperature is expected to be caused by the project. The project is</p>
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			expected to have some positive impacts related to local employment.
14.	Vrinas and Rinia heads of villages	24/09/2021	Project information was shared by ESIA consultant. Preliminary socio information provided by heads of villages
15.	Administrative Unit of Katund i Ri	18/01/2023	<p>Project information and summary of Scoping Report was presented. The representative of the institution made the following remarks:</p> <ul style="list-style-type: none"> <li>• The institution supports the development of the Project;</li> <li>• Although located on state land, the company should check for any claims from the local population in the area where the project will be developed;</li> <li>• Employment of the local community should be on the focus of the company together with possible investments in the area;</li> <li>• Local population should be informed about project impacts, since in the area will be developed other important project like the new port of Durres.</li> </ul>
16.	Administrative Unit No. 6, Durres	16/01/2023	<p>Project information and Scoping Report was presented. The representative of the institution made the following remarks:</p> <ul style="list-style-type: none"> <li>• The Administrator expressed her positive view and their support on the development of the Project.</li> <li>• The company should consider some potential investments in the area;</li> <li>• Consider assessing impacts for the new construction area of the earthquake of 2019, although is quite far from the project zone;</li> <li>• Employment of the local community;</li> <li>• Stakeholders recommended that the timing of the public hearing should avoid periods that could affect participation or public perception.</li> </ul>
17.	Administrative Unit of Rashbull	18/01/2023	<p>Project information and Scoping Report was presented. The representative of the institution made the following remarks:</p> <ul style="list-style-type: none"> <li>• The Administrator expressed the support on the development of the Project.</li> <li>• The company should consider some potential investments in the area;</li> <li>• Employment of the local community should be on the focus of the company;</li> <li>• The public hearing for the ESIA disclosure should be held after the local elections (May) to avoid instrumentalization of the project for political purposes.</li> </ul>
18.	Administrative Unit of Rashbull, Katund I Ri and Administrative Unit no. 4 Durres	June 2025	<p>Information meeting about commencement of project early works. Also, information about additional farmers who use the project site (PDA area) for grazing activities:</p> <ul style="list-style-type: none"> <li>• Information about Voltalia and the project was provided. A project information leaflet, which also includes grievance submission information, was handed over to the representatives;</li> <li>• The representatives were informed that early works are set to start end of July or beginning of August;</li> </ul>

			<ul style="list-style-type: none"> <li>• Representative were asked whether they have identified additional farmers who use the PDA for grazing activities. Representatives of Rashbull and Katund i Ri responded that no additional farmers use the area for grazing activities;</li> <li>• The representative of Administrative Unit No. 4 informed that to her information, there are other farmers using the are for grazing activities but have not identified the persons, and will inform once identified.</li> <li>• In addition, they were informed that the project has already completed a survey of the area and identified and documented the assets within the PDA.</li> </ul>
19.	Project Affected Household	March 2025	Project information was disclosed, Socio-economic survey and assets-related information was collected.
20.	Local Communities	25.07.2025	Leaflets were distributed in the project area and villages of Adriatik and Shenavlash to inform the communities about the commencement of project early works.
21.	Local Communities	August, 2025	Project Awareness meetings were organized, targeting 3 nearest communities to the PV Site: Shenavlash, Adriatik and the nearest residential cluster of Spitalla, which followed public announcements and communications with village leaders. The goal was to provide project updates to communities. Villages of Shenavlash and Adriatik recorded no participation except the village leaders. Thus, village leaders were invited to address any community concerns to Voltalia. Evidence of these meetings can be found on Annex A, file: "Community Awareness – August 2025"
<b>Business (formal and informal)</b>			
22.	N/A	N/A	N/A
<b>Others</b>			
23.	N/A	N/A	N/A

## Public Hearing

A formal Public Hearing for the project "Ndërtimi i Parkut Fotovoltaik 100 MW në Spitallë" was held on **25 September 2025**, at "Aleksandër Moisiu" University, Durrës, in compliance with the requirements of Law 10440/2011 "On Environmental Impact Assessment" and relevant bylaws. The hearing was organised by Voltalia and the ESIA Consultant, with the support of Durrës Municipality and the Regional Environmental Agency, and followed a structured disclosure process including media announcements, official postings, community outreach and distribution of informational materials.

The purpose of the hearing was to:

- Present the Project design, location, technical characteristics, and planned activities;
- Disclose the key findings of the Draft ESIA;
- Inform stakeholders of potential environmental and social impacts, proposed mitigation measures and monitoring commitments.
- Provide a platform for questions, clarifications and recommendations from authorities, community members, local businesses and media representatives.

The meeting was attended by representatives of national, regional and local authorities, community members from Spitallë, Shënavlash and surrounding settlements, academic institutions, and local residents. Participants received explanations on the project footprint, technology, flood-risk considerations, biodiversity issues, drainage system management, construction timelines, procurement procedures, land and access issues, archaeological observations, and expected local employment opportunities.

Overall, participants expressed constructive feedback and raised context-specific questions. Voltalia and the ESIA team provided detailed responses during the hearing, and these have been documented in the official minutes. The issues raised during the event have been integrated in the ESIA impact assessment and reflected in the relevant thematic chapters.



National Newspaper Announcement



National Television Announcement



Public Hearing



Poster Announcement

The table below presents the main issues, questions, comments and recommendations raised by participants, along with the corresponding responses provided by Voltalia and the ESIA consultant and clarifications.

NO.	ISSUE / QUESTION RAISED	RESPONSE PROVIDED	CLARIFICATION / FOLLOW-UP
1	Whether the procurement process will be the same for construction and operation phases.	Yes. A structured procedure will be applied.	In line with Law 162/2020 and Art. 17 of Law 10440/2011.
2	Capacity of households supplied and construction timeline.	70% energy to the state; construction 13–14 months.	Timeline aligned with ESIA and project design.
3	Status of institutional comments on the ESIA.	NEA circulated ESIA to relevant institutions; comments have been addressed.	Complies with Art. 14 of Law 10440/2011.
4	Concern that project fencing exceeds permitted boundary.	Fencing follows approved permits; 123 ha used out of 129 ha granted.	Compliant with MIE permits and Law 107/2014.

NO.	ISSUE / QUESTION RAISED	RESPONSE PROVIDED	CLARIFICATION / FOLLOW-UP
5	Responsibility for drainage channel maintenance.	Municipality maintains primary channels; Voltalia maintains secondary/tertiary ones.	Based on Law 111/2012 on Integrated Water Resources.
6	Impacts on landowners along the transmission line corridor.	TL built by Voltalia, owned by OST; OST manages expropriations.	Expropriations per Law 8561/1999.
7	Community access for livestock grazing after construction.	To be assessed case-by-case with community.	Access management to balance safety and community needs.
8	Archaeological materials reportedly found in project area.	Materials have no archaeological value; site was a historic dumping area.	Chance-Find Procedure follows Law 27/2018.
9	Flood risk due to former wetland conditions.	Hydrological study done; max flood depth 1.2 m; design mitigates duration <24h.	Integrated in ESIA mitigation & emergency planning.
10	Importance of maintaining drainage channels.	Voltalia will maintain channels within project boundary.	Included in ESIA Monitoring Plan.
11	Risk of bird collision with overhead transmission line.	Bird diverters will be installed.	Measure aligned with PR6/PS6 biodiversity requirements.
12	Cumulative impacts with nearby planned developments.	Cumulative impacts assessed in ESIA (biodiversity, hydrology, CH, social).	Aligned with EBRD/IFC cumulative impact methodology.
13	Effect of PV Park on microclimate during summer.	Expected minor, localized temperature increase only near panels.	Assessed under ESIA physical environment.
14	Priority for employment of local residents.	Local workforce will be prioritised in construction and operation.	Reflected in Labour Management Plan.
15	Whether PV Plant and TL are assessed together.	Both components are assessed jointly as one project.	Approach consistent with EIA legislation and good practice.

The consultation confirmed broad stakeholder interest in environmental safeguards, land use, drainage management, biodiversity protection, flood risk, and community benefits. No objections to the Project were recorded. All issues raised have been reflected in the ESIA chapters on biodiversity, hydrology, land and access, construction impacts, cultural heritage, and social impacts. The Public Hearing was conducted in full compliance with the Albanian EIA legislation, international standards (EBRD/IFC), and the principles of transparency and inclusive participation.

## 3.2 Stakeholder Identification, Analysis and Mapping Approach

Stakeholder identification, analysis and mapping has taken place during the ESIA scoping and is described in **Section 3.3**. Information collected during scoping serves as a framework for the development of a Stakeholder Engagement Plan (SEP) for the ESIA and provides the broad framework, targets and objectives for all engagement activities.

The objective of the stakeholder analysis is to categorise the identified stakeholders and determine which:

- Are directly and/or indirectly affected by the project (or Project's operations),

- Have interests in the project or present companies that determine them as stakeholders, and
- Have the potential to influence projects outcomes or Project's operations.

**Stakeholder interest** is defined as the extent to which the interests of a stakeholder are affected by the Project, either due to the Project's direct impact on them or because of political, financial, social, cultural, scientific or technical interests in the Project. These interests can either be positively or negatively affected leading to either an improvement or deteriorations in a stakeholder's baseline conditions.

**Stakeholder influence** refers to the power that a stakeholder has over the Project's outcomes. Influence can be direct or indirect. Indirect influence derives, for example, from a stakeholder's ability to influence others or their access to important information. Formal influence may derive from their ability to directly affect decision making through, for example, the issue of government approval and permitting decisions.

A common approach for the identification of the importance of stakeholders is to map the stakeholder's impact on the Project against the extent to which the Project may impact the stakeholder. A matrix is illustrated below in FIGURE 5.

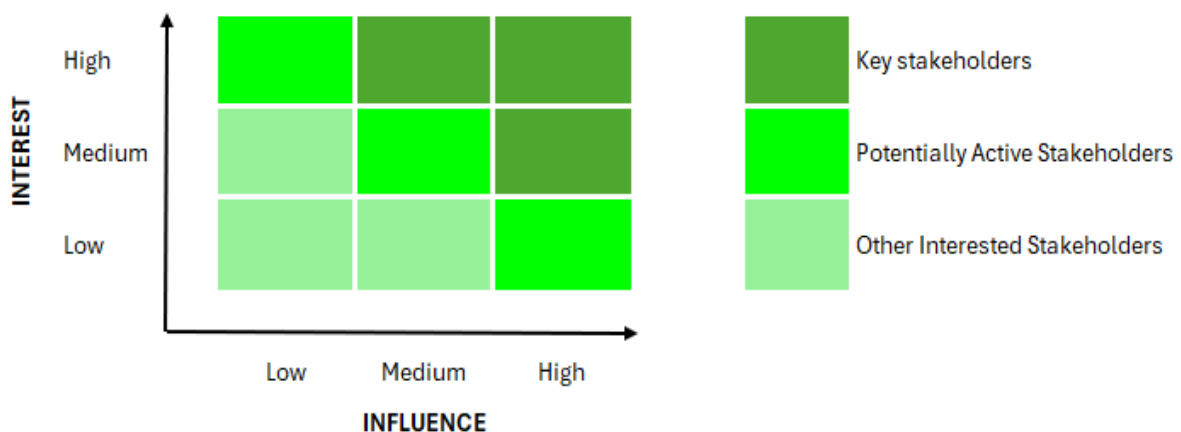


Figure 5: Illustrative interest/influence matrix

The table below reflects three levels of stakeholder categories and outlines the engagement approach and corresponding objective of stakeholder consultation, per category of stakeholder.

Table 3: Engagement Approach and Objectives Per Stakeholder Category

STAKEHOLDER CATEGORY	ENGAGEMENT APPROACH	ENGAGEMENT OBJECTIVE	STRATEGY / MAIN ACTIONS
Key Stakeholders (KS)	Participation	To arrive at a mutually satisfactory way forward through dialogue; building a strong relationship with the relevant stakeholders and including them in the processes of analysis and decision-making.	<ul style="list-style-type: none"> <li>• Maximum feedback importance</li> <li>• Personal, frequent contact</li> <li>• Priority for information sharing</li> <li>• Regular communiqué regarding GRM availability</li> </ul>

<b>Potentially Active Stakeholders (PAS)</b>	Consultation	A flow of information between the Project and the public to obtain stakeholder input and feedback; this provides opportunities for the public to express views and issues.	<ul style="list-style-type: none"> <li>• Maintain regular contact</li> <li>• Closely monitor level of interest and involvement</li> <li>• Prioritise information sharing as needed</li> <li>• Regular communiqué regarding GRM availability</li> </ul>
<b>Other Interested Parties (OIP)</b>	Information	A one-way flow of information from the Project to the public. In international best practice this is sometimes termed “disclosure” and is not considered a sufficient approach to real stakeholder involvement. However, it’s essential in conjunction with consultation.	<ul style="list-style-type: none"> <li>• Maintain brief and informed contact</li> <li>• Occasional contact</li> <li>• Discreet monitoring</li> <li>• Occasional communiqué regarding GRM availability</li> </ul>

Higher levels of disclosure and consultation correspond to the provision of more detailed project information and more in-depth discussion in relation to project impacts. Lower levels of disclosure and consultation represent more limited project information and discussion and are generally less technical and less specific in nature.

Stakeholders that have both high influence and high impact will be continuously engaged and kept fully informed throughout the Project. Those with high influence include both ‘decision-makers’ and ‘opinion leaders’ and are thus considered ‘*Key Stakeholders*’. Stakeholders that have low influence, but high interest will also be kept well informed and involved in a process of informed consultation and participation, so that their views are taken into account in project decision making and are therefore considered ‘*Potentially Active Stakeholders*’. Those stakeholders with a low level of influence and interest are categorised as ‘*Other Interested Parties*.’

### 3.3 Project Stakeholder Identification, Analysis and Mapping

At this point, the stakeholders that are identified include:

- Ministry of Infrastructure and Energy (MIE)
- Ministry of Tourism and Environment (MTE)
- Ministry of Agriculture and Rural Development (MARD)
- Ministry of Culture (MoC)
- National Environment Agency (NEA)
- National Territorial Planning Agency (NTPA)
- National Agency for the Protected Areas (NAPA)
- National Institute of Cultural Heritage
- Transmission System Operator
- Regional Agency for the Protected Areas
- Drainage Board
- Prefecture of Durres Region

- District Council of Durres
- Durres Municipality
- Administrative Unit of Rashbull
- Dyrrah City Football Academy
- Local communities in the project area (villages of Adriatik and Shenavlash);
- Project Affected Households (PAHs)

The following is a presentation of the level of influence and interest of stakeholders in this Project. The analysis shows the category of stakeholders after using the approach as captured in **Section 3.2** above.

Table 4: Stakeholder Analysis

STAKEHOLDER IDENTIFICATION	STAKEHOLDER NAME/ TITLE	ROLE IN PROJECT	ANALYSIS: LEVEL OF INFLUENCE	ANALYSIS : LEVEL OF INTEREST	STAKEHOLDER CATEGORY
<b>Government ministries</b>	Ministry of Infrastructure and Energy (MEI)	The Ministry has a wider scope of responsibility, encompassing not only energy but also transport, spatial planning and telecommunications, with the aim of promoting coordination across these sectors. The ministry will transfer the land to Voltalia for the purpose of development of the 100MW Spitalla Project.	High	High	KS
	Ministry of Tourism and Environment (MTE)	The Ministry is the institution responsible for overseeing the ESIA procedure and approving the ESIA report.	High	Medium	PAS
	Ministry of Agriculture and Rural Development (MARD)	Ministry is responsible for managing water resources, irrigation, drainage and flood protection. The Ministry coordinates priorities among different purposes and different users of water resources.	Medium	Low	OIP
	Ministry of Culture (MoC)	Protection and conservation of the National cultural heritage (shall be informed in chance findings during the construction activities) Provide information on	Medium	Low	OIP

STAKEHOLDER IDENTIFICATION	STAKEHOLDER NAME/ TITLE	ROLE IN PROJECT	ANALYSIS: LEVEL OF INFLUENCE	ANALYSIS : LEVEL OF INTEREST	STAKEHOLDER CATEGORY
<b>Government Departments and Agencies</b>	National Environment Agency (NEA)	cultural heritage in the project area. This Agency is responsible for supervision, implementation of the ESIA procedure and review and approval of the ESIA report. Supervision of the public engagement during the ESIA process.	High	High	KS
	National Territorial Planning Agency (NTPA)	NTPA is a public institution under the Ministry of Infrastructure and Energy (MEI), responsible for spatial and urban planning, which are critical stages in the development process of infrastructure projects.	Low	Low	OIP
	National Agency for the Protected Areas (NAPA)	NAPA is a public body under the Ministry of Tourism and Environment, responsible for managing protected areas.	Low	Low	OIP
	National Institute of Cultural Heritage – Ministry of Culture	The protection and conservation of national cultural heritage should be ensured, with any chance findings during construction activities being reported. Information regarding the cultural heritage within the ESIA study area should also be provided.	Medium	Low	OIP
	Transmission System Operator (OST)	OST provides the necessary capacities for the transmission of electricity produced for domestic resources. For the 100 MW Spitalla Project, Voltalia is responsible to obtain all legal permits and build the Transmission Line	High	High	KS

STAKEHOLDER IDENTIFICATION	STAKEHOLDER NAME/ TITLE	ROLE IN PROJECT	ANALYSIS: LEVEL OF INFLUENCE	ANALYSIS : LEVEL OF INTEREST	STAKEHOLDER CATEGORY
		before transferring TL ownership to OST.			
<b>Local Governance Authorities</b>	Regional Agency for the Protected Areas - Durres	RAPA – Durres is a public body under the National Agency for the Protected Areas, which is responsible for the management of the Regional protected areas.	Low	Low	OIP
	Drainage Board	Drainage Sector is responsible for managing irrigation, drainage, and flood protection.	Medium	Medium	PAS
	Prefecture of Durres Region	Reporting key concerns/opinions to the Government. Role in facilitation of the public engagement and hearing process.	Low	Medium	OIP
	District Council of Durres	Reporting key concerns/opinions to the Government. Role in facilitation of the public engagement and hearing process.	Low	Medium	OIP
	Mayor of Durres Municipality	Elected representative of the community, reporting key concerns/opinions to the Government. Role in facilitation of the public engagement and hearing process.	Medium	High	KS
	Administrative Units	Role in facilitation of the public engagement and hearing process	Medium	High	KS
<b>RAMSAR Conservation Agency</b>	N/A	N/A	N/A	N/A	N/A
<b>Local NGOs</b>	Dyrrah City Football Academy	Construction and maintenance of a football facility next to project PV Facility	Medium	Medium	PAS
<b>Community Groups</b>	N/A	N/A	N/A	N/A	N/A
<b>Communities</b>	Local communities in the project area, Head of Villages	Settlements and HHs likely to experience impacts pertaining to land loss, economic displacement, disturbance from construction activities	Medium	High	KS

STAKEHOLDER IDENTIFICATION	STAKEHOLDER NAME/ TITLE	ROLE IN PROJECT	ANALYSIS: LEVEL OF INFLUENCE	ANALYSIS : LEVEL OF INTEREST	STAKEHOLDER CATEGORY
PAHs-Project Affected Households	Households directly affected by land acquisition or project activities	Settlements and households likely to experience land loss, economic displacement, or disruption due to construction activities	Medium	High	KS

## 4 STAKEHOLDER ENGAGEMENT PROGRAMME AND TIMETABLE

The main purpose of the engagement programme is to keep the engagement momentum (post ESIA) by actively managing the flow of accurate and consistent information to and from stakeholders and streamline an efficient and transparent stakeholder engagement process. The overall engagement objective is to inform, listen, consult, involve and collaborate.

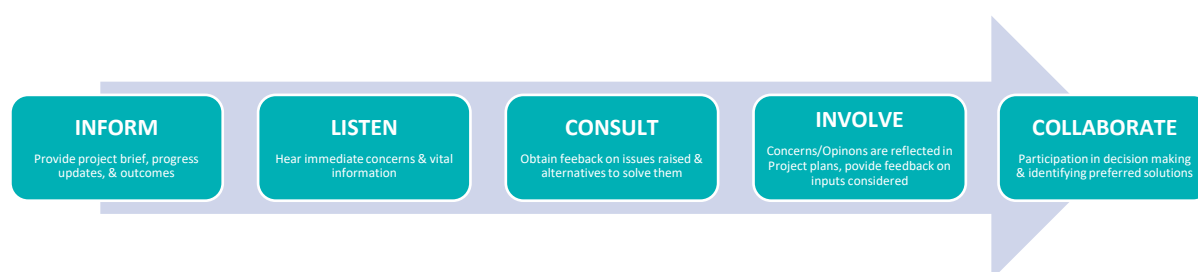


Figure 6 : Stakeholder engagement momentum

Stakeholder engagement will be designed to ensure a consistent, comprehensive and coordinated long-term approach that encourages open and transparent dialogue with as broad a range of stakeholder groups as is appropriate. Our approach to stakeholder engagement will therefore have the following main objectives:

- To facilitate an open and inclusive approach to consultation that provides timely and transparent information (in a preferred language of communication), concerning the Project to all stakeholders, regardless of their status, and to increase their opportunity to provide feedback on the Project and to voice their opinions,
- To provide the mechanism for managing stakeholder and community expectations,
- To gather baseline environmental and socio-economic data to facilitate the assessment of the significance of predicted environmental and socio-economic impacts, and
- To establish a feedback mechanism for ensuring that affected stakeholders have the opportunity to voice their opinions, suggestions and grievances within a transparent process.

For each stakeholder (individuals or groups), the following will be maintained:

- The **engagement method** (e.g., one-on-one meeting, focus group, workshop),
- The **frequency of engagement** required for each stakeholder (for example once-off, weekly, monthly, quarterly, annually),
- **Schedule** with dates and locations where stakeholder engagement activities will take place,
- The **engagement tools** (material/information) required for each engagement activity, and
- For each engagement activity, the **allocated resource** (designated activity owner).

The comprehensive stakeholder engagement programme is presented in **Table 5** below. As information disclosure is a pillar of successful engagement, an understanding of such disclosure that will be conducted during each phase of the Project, is also presented in the table below. Evidence of all disclosure at various Project phases is found in **Appendix B**.

Table 5: Stakeholder Engagement Programme

NO	ENGAGEMENT PROGRAMME AND DISCLOSURE IN EACH PROJECT PHASE						
	IDENTIFIED STAKEHOLDERS	ACTIVITY	METHOD/S	FREQUENCY	SCHEDULE	TOOLS/CONTENT	RESOURCE
<b>Phase: Pre-construction (early works) (May 2025 – December 2025)</b>							
1	Dyrrah Football Academy;  "Nadal" Tennis Academy	Consult about project construction activities and potential impacts	Face to face meetings;  Official mail as required.	Once-off before construction, and as required during construction	At least 2 weeks before construction, then as required	- Project information (leaflets and other materials)	CLO; Social Site Supervisor Project Manager Site Manager
2	Affected Households	Information about project activities and impacts, and socio-economic surveys/Assets Inventories	Face to face meeting	>=3 meetings	April 2025 – throughout construction	Socio-economic surveys, asset inventories, MoMs, official mails.	CLO
3	Affected households; Local communities;  Heads of Villages;  Local businesses; AUs	Information campaign about the asset compensation Cut-Off date	Face to face meetings;  Poster distribution	Once-off	June 2025	Posters, Minutes of Meetings.	Social Site Supervisor,  CLOs

ENGAGEMENT PROGRAMME AND DISCLOSURE IN EACH PROJECT PHASE							
NO	IDENTIFIED STAKEHOLDERS	ACTIVITY	METHOD/S	FREQUENCY	SCHEDULE	TOOLS/CONTENT	RESOURCE
4	Administrative Units	Draft ESIA consultation	Official Communication	Once-off	Sep 2025	- Notification letter, Poster, Leaflets, Newspaper, Tv stations, project Website - PP presentation, attendance sheet - Draft NTS/ESIA	ESIA Consultant
	Local Communities		Consultation Meeting				CLOs
5	Local communities  AUs	Final ESIA Disclosure	Final NTS / ESIA publication	Once-off	Upon final ESIA approval	- Final NTS / ESIA on project website - NTS sharing via official mails - Official mails	Social Site Supervisor CLOs
<b>Phase : Construction (September 2025 – June 2026)</b>							
6	Local communities; Local businesses AUs Municipality		Formal meetings, Face to face meetings; Official mails	Once-off	At least one week before PV Plant and Transmission Line construction	- Official information regarding project timeline, risks during construction	Social Site Supervisor  CLO
7	Project Affected Households	Information about project progress and impacts, compensation, grievances;	Face-to-face meetings; Phone calls	At least monthly	Before start of early works. And then at least monthly throughout construction phase	- MoMs; - Agreements; - Grievance logs;	CLOs
8	Local businesses	Sharing information	Face to face meetings	At least once off	At least 7 days before	Engagement Records Minutes of Meeting	CLOs

ENGAGEMENT PROGRAMME AND DISCLOSURE IN EACH PROJECT PHASE							
NO	IDENTIFIED STAKEHOLDERS	ACTIVITY	METHOD/S	FREQUENCY	SCHEDULE	TOOLS/CONTENT	RESOURCE
		regarding project construction processes, timeline etc			underground section construction		
9	Head of Villages	Consultations about community concerns, potential grievances	Face to face meetings	Quarterly	During construction period	Minutes of Meeting	CLOs
10	Project Workers	Labour Disclosure	Poster notification (GRM)	At start of Construction	Rest Areas (X2) Kitchen/ Canteen (X1) Office (X1) Off site residential (x5)	Grievance channel availability, contact person and QR Code	Social Site Supervisor CLOs
11	Project Workers	Labour Disclosure	Poster notification (GBV-H)	At start of Construction	Rest Areas (X2) Kitchen/ Canteen (X1) Office (X1) Off site residential (x5)	Prevention of gender based violence and harassment identification & reporting, Ethics point portal access	Social Site Supervisor CLO
12	Project Workers	Labour engagement	Induction training	Start of employment	At start of work	Induction training slide presentation	Social Site Supervisor
<b>Phase : Operation (to be determined )</b>							

ENGAGEMENT PROGRAMME AND DISCLOSURE IN EACH PROJECT PHASE							
NO	IDENTIFIED STAKEHOLDERS	ACTIVITY	METHOD/S	FREQUENCY	SCHEDULE	TOOLS/CONTENT	RESOURCE
13	TBD	TBD	TBD	TBD	TBD	TBD	TBD
<b>Phase : Decommission (to be determined)</b>							
14	TBD	TBD	TBD	TBD	TBD	TBD	TBD

## 4.1 Engagement with Minorities and the Vulnerable

The socio-economic survey for the ESIA has identified the pre-existing vulnerable people based on, but not limited to, the criteria mentioned below.

- Widows living alone and/or head of the family
- Households that rely on social assistance for income or have limited incomes/resources
- Households that rely on agriculture and livestock activities as a source of livelihood

However, no vulnerable people directly affected by the project have been identified.

Should women's groups, elderly people, youth and cultural groups be available in the form of associations, collectives or working groups, but only be identified during the roll-out of the engagement programme, the Project will include interfacing and interaction with them.

Should no such representative groups be in existence, the Project will, at public meetings, target these groups for separate focus group meetings at a date and time by agreement. As a further strategy, key informants on the Project may be able to assist in identifying individuals that could form such groups to be engaged.

This allows for a more transparent information sharing process with a more balanced and representative engagement process.

## 4.2 Engagement with Non-Governmental Organizations

Community based organization (CBO's) and non-governmental organizations (NGO's) have the ability to share community knowledge, needs and desires with the Project based on their close relationship with people at a grassroots level. Not only do they work to deliver sustainable solutions but cover the broad range sector-knowledge such as healthcare, agriculture, education and training needs that the Project may require for its community investment programmes.

It is to the Project's benefit to involve them in the engagement process as early as possible.

For this Project, "Dyrrah City Football Academy" has been identified and has been categorized as Potentially Active Stakeholder (PAS). Engagement with this NGO has been incorporated in the engagement program above, while initial communications have commenced.

## 4.3 Incorporating Engagement Outputs into the Environmental and Social Management System (ESMS)

The purpose of the SEP is much broader than presenting a firm grounding for current and future collaboration with both interested and affected parties, but also to ensure that the output of such engagement features in the site-level ESMS and Voltalia's Health, Safety, Environment and Social Management Plan (HSESMP).

Engagement with stakeholders may further inform site level practices such as the deployment of the grievance redress mechanism, and management plans such as the emergency response plan, the

worker accommodation plan (integrated into the project's Labour Management Plan), the biodiversity management plan and of course, this SEP.

All valuable local knowledge on how to better respond to emergencies given the local context, how to treat workers and manage worker conduct, and how to better plan for the local biodiversity which has been a shared resource by local communities for many years, will be transferred into the site-based HSESMP.

The HSESMP will always seek enhancement from the knowledge gleaned from local practices.

## 5 RESOURCES AND RESPONSIBILITIES

In this section, the organizational structure and management functions within Voltalia that are responsible for the stakeholder engagement activities outlined in this SEP, are described.

During the ESIA process, the E&S consultant prepares the first version of the SEP and is responsible for directly performing or supporting Voltalia in performing engagement activities. Note that this may include the Grievance Mechanism. Generally, this is an externally sourced E&S consultant who will provide support to Voltalia in the initial phases of engagement. At the end of the ESIA process, the E&S consultant will prepare an updated version of the SEP which will include main outcomes of engagement activities performed during this phase. The format of these outcomes must align with the Engage templates for upload to the platform. The Engage Platform itself will not be accessible to 3<sup>rd</sup> parties.

Voltalia will assume responsibility for the regular updates of the SEP prior to and during the Construction phase of the project, and again during the Operation and Maintenance phase of the project.

Other contractors and sub-contractors will not be allowed to run or organize engagement activities autonomously. In addition, workers of contractors and subcontractors will not be allowed to collect grievances from individuals or groups but will instead have to redirect them to Voltalia via the official submission channels. Workers will have to be properly informed of this expectation during induction training. Contractors and sub-contractors may however be involved by Voltalia in specific engagement activities on an as-needed basis and in the implementation of resolution measures within the grievance mechanism.

The roles and responsibilities outlined below can be adapted to the organizational structure of Voltalia's on site presence during construction, notwithstanding that all the tasks indicated are properly assigned to a responsible person. The operation of the Project will fall under the responsibility of Voltalia. All staff appointed for stakeholder engagement activities will have to be qualified for the tasks they are undertaking. If necessary, staff will be provided with appropriate training to ensure they are fit for the job.

The **Project's Social Site Supervisor** is responsible for overseeing and coordinating all activities associated with stakeholder engagement, including supporting the implementation of the Projects external grievance mechanism (EGM) that targets external stakeholders such as communities, and presented in *Spitalla Solar External Grievance Mechanism* and the Project's internal grievance

mechanism (IGM) that targets all labour, led by the Projects EPC and presented in “Spitalla Solar Internal Grievance Mechanism”.

Responsibilities include:

- Support the implementation of the Internal Grievance Mechanism (IGM) and External Grievance Mechanism (EGM),
- Ensure that all stakeholder engagement aspects are a permanent item on all high-level management agendas, and that all actions arising from management decisions are implemented aligned to stakeholder participation,
- Determine necessary resources for effective implementation of this SEP,
- Attend stakeholder meetings with technical team members and ensure feedback of stakeholder responses and requests to technical teams are responded to within agreed timescales, and
- Follow-up on any grievances and non-conformities, non-compliance or deviation from the requirements of this SEP.

Specific grievance managements tasks include:

- Ensure confidentiality of the Complainant from the lodging of a grievance onwards and inform the Complainant that the grievance can also be lodged anonymously should the complainant prefer it,
- Ensure that the complaint/grievance is clearly defined/verified and fully understood without any ambiguity,
- Identify the root cause of the grievance, investigate if the grievance is correct or not, identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable),
- In case of high sensitivity grievances, the Social Site Supervisor shall hold the power to escalate,
- Ensure all project personnel, including EPC Contractor/Subcontractors, are trained on the contents of this procedure,
- Ensure the community and project-affected stakeholders are made fully aware of the contents of this procedure, including the process for submitting a grievance,
- Mediate in all grievances received on the site through proper channels, and
- If grievance is unresolved, present opportunities for the Complainant to find resolution. Note-VLT will no longer be responsible to grievances that progress from a site-based grievance to an external dispute mechanism, such as the court system.

The **Community Liaison Officer (CLO)** will act as a focal point of contact with the local communities, leaders and other stakeholders for the purpose of building effective communication and enhancing relationships between the communities and Voltalia projects. The CLO provides support in the development, management and facilitation of the community engagement strategy, plan of action and related field activities for each project. Additionally, the CLO is responsible for the maintenance and upkeep of the External grievance mechanism targeting communities and other interested and affected parties. Tasks include:

- Assist with the development of various programs to educate community members about the projects and to support active community participation during different various project phases,
- Work closely and effectively with other personnel in Voltalia in sensitizing communities on various aspects of the projects,
- Work closely with study consultants and other contractors to ensure that communities are aware of their activities and the expectations for public participation as needed,
- Provide on-going feedback to Voltalia and **Social Site Supervisor** on new and emerging community issues and concerns and recommend strategies and interventions for addressing such issues and concerns,
- Prepare and submit regular reports and updates on community issues to Voltalia and **Social Site Supervisor**, project contractors and other interested parties as necessary,
- Carry out regular spot checks in the project areas with project officers to feed into progress reports,
- Participate in milestone meetings for monitoring the progress of the projects,
- Perform other duties as may be assigned from time to time by Voltalia.

Specific grievance managements tasks include:

- Receive, log and process the complaints/grievances,
- Contact the Complainant in case further clarification is required,
- Explain to the Complainant the process and timelines for the remaining steps in the procedure and inform on how the complaint will be handled,
- Liaise with the Complainant from the moment the grievance is retrieved (reception) until grievance close-out,
- Ensure that the complaint/grievance is clearly defined/verified and fully understood without any ambiguity,
- Communicate/Verify with the Complainant based on the preferred method of communication as specified by the complaint in the grievance form,
- Prepare and file all grievance forms,
- Mediate in all grievances received by the site through proper channels,
- Provide all information necessary according to this procedure whenever there is a grievance, and
- Ensure easy, fast and conclusive resolution of grievances.

## 6 GRIEVANCE REDRESS MECHANISM

The Project's grievance redress mechanism applies to the Project's design, construction, operation and maintenance activities. It includes the grievance procedures for processing grievances filed by any affected or interested person or member of the workforce that wishes to file complaints/grievances or raise concerns, claims or suggestions regarding the Project's activities or on the Project's footprint (within and beyond the Social Area of Influence (Aol)<sup>6</sup> and allow for their timely resolution.

The Project allows for two types of grievances process and management systems:

- The Project's **External Grievance Mechanism (EGM)** targeting communities and other stakeholders. For more details on grievance procedure, refer to External Grievance Mechanism – document code: SPIA01-HSE-PLN-004-01-AL-EN.
- The Project's **Internal Grievance Mechanism (IGM)** targeting the Project's labour force. This includes the EPCs site personnel and all site based contractors and sub-contractors. For more details on grievance procedure, refer to Internal Grievance Mechanism, document code: SPIA01-HSE-PLN-005-01-AL-EN)

All workers will have access to a fully functioning grievance redress system, as per the IGM. All stakeholders, whether interested or affected, and not part of the Project's labour force will have access to a fully functioning grievance redress system, as per the EGM.

Grievances will be received by the Social Site Supervisor, or the CLO, who will formally log, and track grievances, while the Voltalia Social Site Supervisor will investigate and resolve grievances (possibly with the assistance of other relevant senior management). The Engage platform will serve as a database for tracking and logging grievances.

All sensitive grievances, such as those relating to GBV-H are to be directly uploaded to the Voltalia Ethics Portal (<https://secure.ethicspoint.eu/domain/media/en/gui/106905/index.html>), as reported in Section 2.4.3 of this SEP. The upload may be undertaken by the CLO, or directly by the complainant. In such case, it must also be reported to the Voltalia Social Site Supervisor with the appropriate reference number supplied by Ethics point. Once a sensitive grievance is logged via Ethics point, Voltalia's Ethics Committee (which functions at Corporate level) will fast-track the case for resolution. While under investigation, the Ethics Committee will provide the site-based grievance case with interim mitigatory measures to ease the physical, mental and emotional duress experienced by complainants/survivors and alleged perpetrators alike.

A QR Code for all grievances is available to all internal (labour) and external (all other interested and affected parties not part of the labour force). The QR code is publicized on site and off site awareness and training campaigns as well as GRM and GBV-H poster notifications.

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<sup>6</sup> According to the ESIA, the Social Aol is the area with a radius of 2 km of the project site, and which includes all social receptors.



Figure 7 : QR code for direct access to the GRM

A similar grievance resolution process is utilized for both the IGM and EGM. A flow chart is presented below, showing expected activity and responsible persons, grievance process and the anticipated timeline to resolutions.

## ACTIVITY & RESPONSIBILITY

**GRM Awareness Building**  
 HR Coordinator  
 CLO & Social Site Supervisor

**Receive, Register, Categorize, Acknowledge**  
 CLO & Social Site Supervisor/ HR Coordinator

**Review and Investigate**  
 Internal GRM  
 HR Coordinator  
 External GRM  
 Social Site Supervisor & Management

**Develop resolutions options, respond to grievance, re-evaluate where necessary, obtain sign-off if accepted.**  
 Internal GRM  
 EPC E&S / HR  
 HR Coordinator  
 External GRM  
 Social Site Supervisor in collaboration with Voltalia Management

**Monitor and Support Resolution Implementation**  
 Site Manager & Voltalia Social Site Supervisor

## PROCESS AND TIMELINE

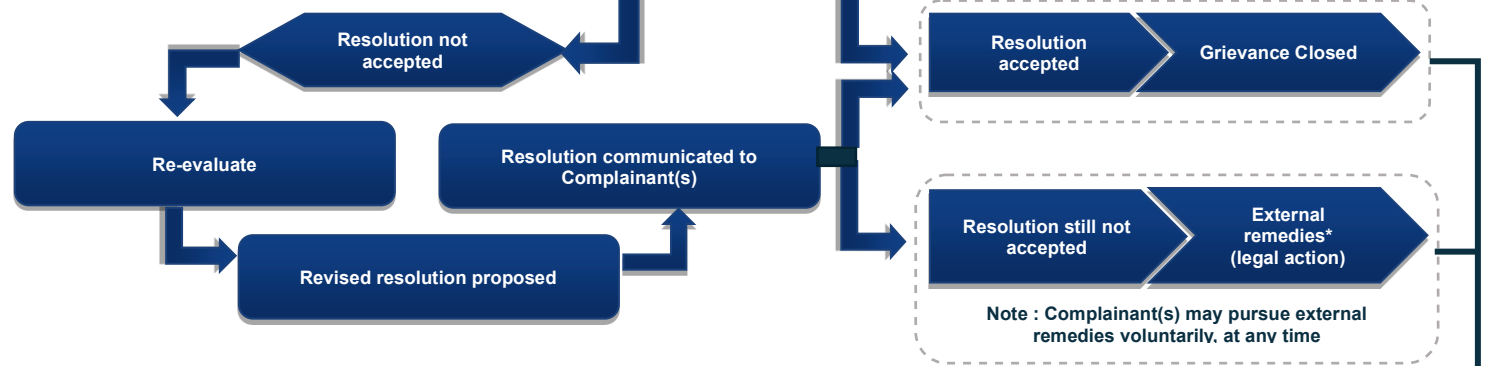
Promote the availability and use of the Internal and External GRM. For workers, appropriate induction & training, GRM boxes and availability of personnel to be communicated. For communities and others, workshops, poster notifications, announcements and GRM boxes and availability of personnel to be communicated.



Within 1 day (24 hours) following grievance receipt



Within 5 days following grievance receipt



Within 7 days following grievance receipt

If proposed resolution is not accepted by the Complainant(s), a revised resolution shall be proposed within 3 days of the resolution rejection.

Within 10 days following the grievance receipt, Close out or mark as Unresolved\_ External remedy sought

Figure 8 : Grievance management process

## 6.1 Grievance Severity Level

Once a grievance is received and registered, it will be assessed and categorised to determine the severity level of that grievance. The table below is a preceding action to categorising the severity level of a grievance. The grievance typology reflected as IG (Internal Grievance) or EG (External Grievance) 1, 2, 3, or 4 denotes the content characteristic of the grievance. The significance of the grievance is determined according to 'low, medium' or 'high.'

Table 6: Grievance Typology And Significance

Typology of Grievance			
IG/ EG 1	IG/ EG 2	IG/ EG 3	IG/ EG 4
<u>Request for information or clarification</u> on the following (but not limited to) infrastructure, construction site, personnel relations, contractual rights, customary rights or human and labour rights, including topics not directly related to the Project	<u>Questions / concerns</u> Any concern, unhappiness, or discontent that a worker or external stakeholder might have in the workplace or related to accommodation conditions	<u>Requests / Petitions / Protests</u> by either the work force or external stakeholders	<u>Complaints</u> (includes but not limited to) pay and benefits, bullying, work conditions, discrimination, behaviour of contractors, damage to property
Significance of Grievance			
<b>Low</b>	Concern, claim or grievance regarding a lack of information or unclear information provided.		
<b>Medium</b>	Concern, claim or grievance from the workers (individual or as a group) or from external stakeholders (individual or as a group) that could compromise the projects development in the short to medium term.		
<b>High</b>	Concern, claim or grievance involving the workers, collective group of workers or external stakeholders. Relevant to: <ul style="list-style-type: none"> <li>• Contractor or Company breach of the Code of Conduct,</li> <li>• Violations/ transgression of human rights,</li> <li>• Contractor or Company breach of the country labour law,</li> <li>• Non-compliance to the principles enshrined in international E&amp;S standards.</li> </ul> Poses a short- and long-term risk to the project continuity.		

The cross assessment of the **grievance typology** and the **grievance significance** results in a grievance **Severity level** categorisation. The severity level of a grievance directs those investigating and responding to the urgency and possible need for the grievance to be escalated for address by both the EPC and Voltalia. All grievances that are categorised as a **Severity level 3** are automatically escalated for Voltalia intervention.

TABLE 7: Categorization Of The Grievance Severity Level

Significance Typology	Low	Medium	High
IG/ EG 1	Level 1	Level 1	Level 1
IG/ EG 2	Level 1	Level 1	Level 1
IG/ EG 3	Level 1	Level 2	Level 2
IG/ EG 4	Level 1	Level 2	Level 3

Appropriate grievance investigation methods and resources to undertake the investigation, are determined once the categorization of the grievance is completed.

- A **Level 1** grievance requires the CLO/ Social Site Supervisor to respond to grievant/ complainant's request for information or request for clarification, which can be quickly addressed with an official dispatch of a written letter and supporting documentation, where available,
- A **Level 2** grievance includes concern/s, claim/s or discontent expressed by complainant(s) (individual or as a group) that could compromise the projects progress in the medium term. Such grievances require the Social Site Supervisor to inform the Project Manager immediately about the potential Level 2 grievance and start collaborating with the Site Manager and Human Resources Coordinator (as necessary), in order to resolve the issues in a timely manner.
- A **Level 3** grievance entails the highest severity level and could involve disciplinary cases or the need for deeper or extended investigation activities. In all of the below, it is crucial that the Voltalia site management be kept informed of developments via the Voltalia Social Site Supervisor:
  - The need to involve witnesses,
  - The need to use closed circuit television video (CCTVs) and other audio/ visual recording devices as part of the evidence-gathering exercise, and
  - The mobilization of further resources (as in the case of psycho-social harm on the survivor of abuse) for treatment purposes. All grievances of a sensitive nature (as with those logged through Voltalia's Ethics point presented in Section 2.4.2 of this SEP) would require the involvement of Voltalia's Compliance Department. In extreme circumstances, it may require the need for an external, independent investigator to gather information in an effort to conduct an independent Root-cause analysis.

## EBRD MECHANISM

Affected stakeholders have the right to raise concerns directly with the Bank. The EBRD's Independent Project Accountability Mechanism (IPAM) allows individuals, communities and civil society organisations to submit complaints about actual or potential harm linked to EBRD-financed projects where concerns relate to the Bank's environmental, social or information-disclosure obligations. Complaints may be submitted after project approval and up to 24 months after the EBRD has ceased its financial involvement, provided they describe harm to people or communities and relate to

compliance with the Environmental and Social Policy or the Access to Information Policy, and they may request confidentiality where there is fear of retaliation, which IPAM explicitly does not tolerate.

Complaints can be filed in writing using IPAM's secure, encrypted online form available in English, Russian and Arabic (<https://www.ebrd.com/home/forms/ipam-english.html>), by email to [ipam@ebrd.com](mailto:ipam@ebrd.com), by post to Independent Project Accountability Mechanism, European Bank for Reconstruction and Development, Attn: Victoria Marquez-Mees, Chief Accountability Officer, Five Bank Street, London E14 4BG, United Kingdom, or via an EBRD Resident Office with a request for forwarding to IPAM. The complaint must include the complainant's name and contact details (or a confidentiality request), a description of the project and the alleged harm, information on prior contact with the client or the Bank (unless this would be futile or harmful), and any relevant supporting information; complainants may also indicate whether they prefer problem-solving or compliance review.

## 7 MONITORING AND REPORTING

It is vital to keep meticulous records of the stakeholder engagement activities and associated communications throughout the lifecycle of the Project. Solid record keeping not only provides a robust reflection of the process followed, but also serves as an indicator of the stakeholder engagement process compliance with the required regulatory framework, policies, and Voltalia's Engage platform.

Voltalia will be responsible for keeping track of all activities performed as per commitments in this SEP. The record keeping process will include the following aspects:

- Stakeholder identification and mapping, periodically updated,
- Stakeholder engagement activities register, with an indication for each activity performed, including the date and location, participants, information disclosed and outcomes of the activity. If agreed by stakeholders, pictures of each activity will be taken and appropriately stored,
- Records or copies of all the communication material distributed to stakeholders,
- Periodic reports prepared, and
- Updated SEP versions.

The Engage platform will be used to keep all records of stakeholder engagement process, from informal communication such as phone calls, to Minutes of Meetings and official mails. CLOs and the Social Site Supervisor will be responsible for logging all stakeholder engagement processes and communications on the Engage platform.

The Stakeholder Engagement Programme, formulated and presented in **Section 4** will serve as the backdrop to the Project's engagement reporting. All project impacts and mitigations applied during the project will constitute part of the content of information transfer from the Project to stakeholders. Collaboration between the Project and stakeholders on further opportunities and strategies for mitigation will be an on-going effort, much of it being the result of the on-going stakeholder engagement. Evidence of such collaboration will be in the form of meetings minutes (MoM) that would provide evidentiary data of such collaboration.

Voltalia releases a yearly Corporate Sustainability Report that comprehensively shows stakeholder engagement as one of the reporting parameters. The Sustainability Report is made available on the Company website and is for open access.

## 7.1 SEP Monitoring

Key performance indicator (KPI) reporting will include specific KPI's related to stakeholder engagement and monitoring of stakeholder grievances and grievance close-out. **See Table 8** below.

Table 8: SEP Key Performance Indicators

NO	KPI	TARGET	DATA COLLECTION FREQUENCY	MONITORING MEASURES	RESOURCE/ RESPONSIBILITY
1	Days without a significant <sup>7</sup> Environmental or Social incident	No significant environmental or major social incident	Weekly	Number of significant Environmental and Social incidents	Social Site Supervisor
2	External stakeholder (community) grievances	90% of community grievances aimed to be resolved within set timelines	Weekly	Grievance Log (number of community grievances closed / number of community grievances received)	CLO and VLT Social Site Supervisor
3	Internal stakeholder (labour) grievances	90% of grievances aimed to be resolved within set timelines	Weekly	Grievance Log (number of labour grievances closed / number of labour grievances received)	Social Site Supervisor; HR Coordinator
4	Stakeholder Engagement	100% Stakeholder Engagement Activities as per SEP	Monthly	Stakeholder Engagement Log - (% stakeholder engagement activities (number of stakeholder engagement activities conducted / number of stakeholder engagement activities planned)	Social Site Supervisor

## 8 MANAGEMENT FUNCTIONS

Full oversight of the SEP will be administered by the project Social Site Supervisor. The CLOs will report directly to the Social Site Supervisor. In the case of this Project, Voltalia has also tasked an advisory role to its offshore resource that acts in the capacity of Regional E&S Advisory Support. This is captured in the report-line illustration below.

<sup>7</sup> 'Significant' would refer to those incidents that would likely to change the Project's risk scenario from a 'low/ medium' to 'high'

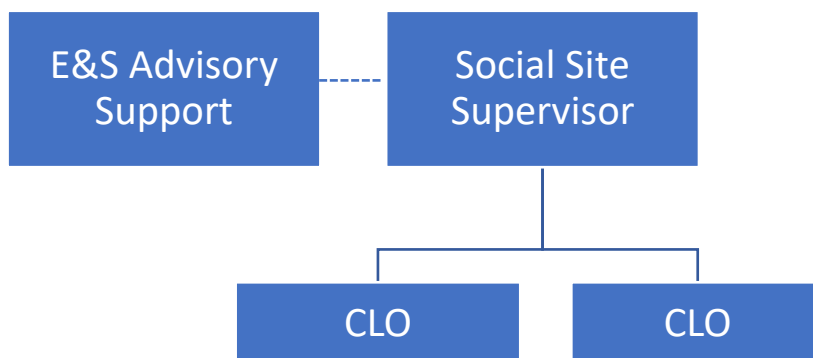


Figure 9 : SEP MANAGEMENT FUNCTION

Appointed SEP management roles include:

**Voltalia Social Site Supervisor:**

Rematlen Bollobani

Mobile: +355 68 80 51 787

e-mail: r.bollobani@voltalia.com

**Voltalia CLO:**

Elvan Muca

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e-mail: e.muca@voltalia.com

Gerta Kajno

Mobile: +355 68 40 45 287

e-mail: g.kajno@voltalia.com

## 8.1 Internal Communication of the SEP

The Voltalia Social Site Supervisor will, during the course of weekly Project meetings communicate completed and outstanding tasks of the Project’s SEP. Specific challenge areas will be highlighted where further assistance may be required from the Project on site management. As per standard work procedures, the Project Manager and Site Manager are required to be fully knowledgeable about both internal and external engagement activities and potentially offer support at pre-determined meetings where their attendance is required.

## 8.2 Management Tools

As reported in Section 2.4, Voltalia has an established digital platform (the Engage Platform) that comprehensively captures all information on the project (including communications, engagement, complaints/ grievances) in the project impacted local communities, broader communities, and the labour workforce. Voltalia CLOs are trained in how to use the Engage workbook templates for quick transference of data onto the Engage platform.

The Voltalia Social Site Supervisor and CLO are the only licensed operators of the Engage platform, therefore have ultimate authority to review and adjust information before and after data collection and upload to the platform. This information that is uploaded can be extrapolated from the platform at any stage to provide tracking and monitoring information as required. This would present the computed

data that can be incorporated into periodic engagement reports for the Project, using the Stakeholder engagement programme presented in **Section 4** as the indicators against which to report.

### **8.3 Managing Contractor Relationships**

As with most Voltalia Projects, the lead EPC is often engaging with a number of sub-contractors in order to fulfil their contractual obligations with Voltalia. Voltalia through its Social Site Supervisor and HR Coordinator maintains oversight of local stakeholder relationships with sub-contractors, particularly when local service provider procurement and recruitment is sought. Every action executed by the EPC and its sub-contractors is reported in advance at the weekly Project team meetings and should any of these actions require the setting up of local meetings, it is the Voltalia CLO that will assist. The Social Site Supervisor and HR coordinator are tasked with maintaining internal (labour) stakeholder relationships, and the Voltalia CLO that is tasked with maintaining external (local and broader) stakeholder relationships with the support of the Voltalia Social Site Supervisor.

Meetings with local representatives will take place with the Voltalia CLO in attendance. All meetings will result in a minuted record of discussions and results will be immediately forwarded to the Voltalia Social Site Supervisor for his attention.

# **APPENDIX A:**

## **Meeting records – Past Engagement and Disclosure**

Available upon request.

# **APPENDIX B: Stakeholder Engagement Programme – Disclosure Records**

Available upon request.