

Irshanska Solar Project Stakeholder Engagement Plan (SEP)

15 July 2019

1 Introduction

1.1 Background

The project developer *Irshanska SES LLC* has approached the European Bank for Reconstruction and Development (EBRD) for financing the construction of Irshanska solar photovoltaic power plant (the Project) in Zhytomyr region of Ukraine. The project is thus subject to the EBRD's 2014 Environmental and Social Policy, and has been determined as a Category B project. EBRD's consultants have conducted an environmental and social due diligence assessment of the project and supported the development of applicable environmental and social documentation, namely, an Environmental and Social Action Plan, a Non-Technical Summary of the environmental and social considerations, and a Stakeholder Engagement Plan.

The project developer considers stakeholder engagement as an essential part of good business practices and corporate citizenship, and a way of improving the quality of projects. In particular, effective community engagement is central to the successful management of risks and impacts on communities affected by projects, as well as to achieving enhanced community benefits. To meet the EBRD requirements for stakeholder engagement, public consultation and information disclosure¹, a stakeholder engagement process with development of a Stakeholder Engagement Plan (SEP) is being applied to this project. These details are laid out in this document, the SEP.

1.2 The Project

The project will construct a solar power plant with 91 048 photovoltaic modules and other associated equipment, which will provide a maximum installed capacity of 23 MW_{AC}, and approximately 34.41 Gigawatt-hours of net electricity generated per year.

The plant will be operated on an area of 47.89 hectares split into 6 land plots that are leased for the project. For connection to the distribution grid, the project will construct a new 110/10kV substation "*Irshanska SES*", which will connect to an existing 110/10kV substation "*Meleni*" owned by Oblenergo by an 800m-long underground 110 kV transmission cable. The generated electricity will be sold to the grid at the "green tariff". No new roads to access the project site are planned, but the existing dirt roads will be upgraded with gravel.

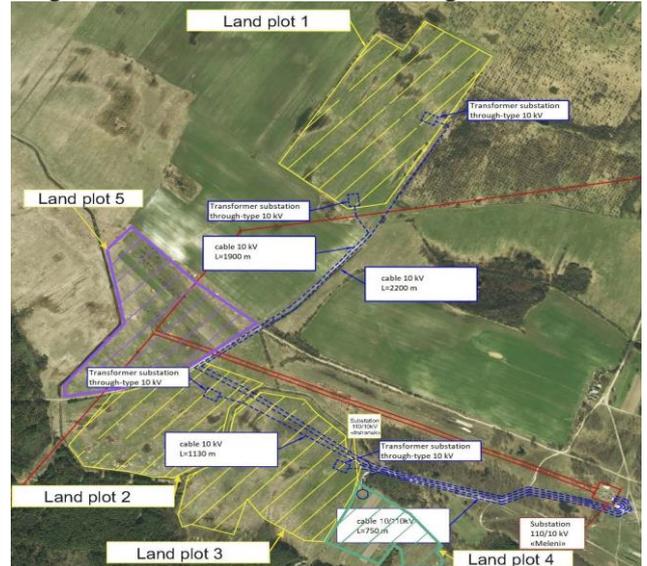
The project will be located near Meleni village (1019 residents) of Korosten district in Zhytomyr Region. The nearest residential area of Meleni is located at approximately 600 m east of the project site. The location of the project site and key facilities are shown on the Figure 1.1 and Figure 1.2 below.

¹ EBRD Performance Requirement PR10

Figure 1.1 General map view



Figure 1.2 Close-in satellite image



The plant will be constructed, commissioned and operated by *Irshanska SES Limited Liability Company*, which was established for implementation of this project, or its contractors. Its parent company, *Solar World Aquiris (Luxembourg)*, is one of leading solar power developers in Europe. The local partner for the project will be *Tesla Energo*, an established Zhytomyr-based renewable energy company.

By employing the renewable solar power, the project will provide significant environmental benefits over other types of energy generation, such as those using fossils fuels (gas, coal) or nuclear. It will contribute to the reduction of emissions of greenhouse gases (expected annual emission reductions are 26 480 tons of carbon dioxide equivalent), create some temporary construction jobs, and improve the security of energy supply in the area.

1.3 Requirements for Stakeholder Engagement and Public Consultation

Ukraine is a signatory of Aarhus Convention on Access to Information and Public Participation (UNECE)². The convention is designed to improve the way ordinary people engage with government and other decision-makers on environmental matters. Consequently, people are entitled to be informed about environment related issues pertaining to the project. National legislation also provides for public involvement in decision-making process.

As per EBRD’s Environmental and Social Policy of 2014, the project funded by the Bank must meet the best international practices and requirements for stakeholder engagement and public consultations. The principles, requirements, methodological and procedural aspects of stakeholder engagement for EBRD projects are described in detail in Performance Requirement (PR) 10 “Information Disclosure and Stakeholder Engagement”³. This requirement outlines a systematic approach to stakeholder engagement that will help clients build and maintain over time a constructive relationship with their stakeholders, including the locally affected communities.

The following elements shall be implemented for the project engagement and consultation

² UNECE Aarhus Convention on access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

³ EBRD Environmental and Social Policy 2014 (<http://www.ebrd.com/what-we-do/strategies-and-policies/approval-of-new-governance-policies.html>).

process:

- Identification of project stakeholder groups, including members of the public who could be affected by the Project construction and operation.
- Stakeholder engagement/consultation process and information disclosure. During this stage, *Irshanska SES LLC* will ensure that identified stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation. The disclosed information will include the Project activities and operations. The consultation process will be undertaken in a manner that is inclusive and culturally appropriate for all stakeholders, including effected communities and vulnerable groups.
- Grievance mechanism, by which the general public and other stakeholders can raise concerns, and which will be handled in a prompt and consistent manner, is another key element of stakeholder engagement.

1.4 Previous Stakeholder Engagement Carried out by the Developer

The developer has informed the general public about the planned project and carried out public consultation meetings, as follows:

- The local community was informed about the preparation of project siting plan (DTP) and public consultations thereof in an announcement in local newspaper “*Drevlianskyi Krai*” No 25(13927) published on 22 June 2013, and on amendments to the mentioned DTP by announcement in the same newspaper No 25(14186) published on 6 July 2018 (copies are attached as *Annex A*).
- Public meeting on siting of the project was held in Meleni village on 05 July 2013, and on amendment of DTP – on 08 Aug 2018. According to the minutes, the first meeting (in 2013) was attended by 57 people, all 57 people voted to support the project; and the second meeting (in 2018) was attended by 15 people, 13 people voted to support the project, and 2 abstained. Minutes of the public hearings are attached as *Annex B*.
- During the site visit on 29 Mar 2019, the EHSS Consultant met with the Head of Meleni Council, Mrs. Nina Gryschenko, to discuss the project implementation issues and any concerns thereof. The Head expressed her support to the project, and mentioned no concerns from the local community.

Also, *Irshanska SES LLC* has been discussing the project with local government, regulatory authorities and other stakeholders on an ongoing continuous basis.

1.5 SEP Objectives

This SEP has been developed with the aim of describing how *Irshanska SES* will continue to communicate with people and institutions that may be affected by, or interested in the Project, at various stages of project preparation and implementation. The Plan also includes a grievance mechanism for stakeholders to raise any concerns related to the project for *Irshanska SES LLC*'s attention.

2 Stakeholder Identification and Assessment

In order to define a communication process in line with EBRD PR10, *Irshanska SES*, with assistance from a consultant, has identified key stakeholder groups that may be interested in,

and/or affected by the Project. They include:

- Internal stakeholders, such as *Irshanska SES's* employees and construction contractors' workers;
- Local residents and land owners/users in the project vicinity;
- Government administrations and regulatory authorities of various levels;
- Local media and internet sites with coverage of local and regional affairs;
- Non-governmental organisations (NGOs), scientific research community.

Table 2.1 below provides the details of the Project stakeholders. It will be further developed and continuously updated by the project developer, as the project progresses.

Table 2.1 Project Stakeholders

No	Name of Stakeholder	Description	Contact Person	Contact Details
Internal				
1	Employees	Employees of "Sunotec OOD"	Kaloyan Velichkov, Director	Address: ul. Ohrid 1-3, Sofia 1233 Phone: +359 47 47 147
2	Employees	Employees of Tesla Energo LLC	Gramotenko Oleg Oleksandrovykh Director General	Address: Zhytomyr, Pokrovska 81, 10003 Phone: +38 (067) 4114112
Local residents and land owners/users				
3	Residents of Meleni village	Local residents	Head of village council	Address: 11576, Zhytomyr region, Korosten district, village Meleni, Sadova str., 22-a, phone: +38 (04142) 67-231
Government and regulatory authorities				
4	Zhytomyr Regional Administration	Regional government	Head of Administration	Address: 1, S.P. Koroliova Sqr., Zhytomyr city, Zhytomyr region
5	Department of city construction and architecture at Korosten District Administration	Regulatory agency	Podolskyi M.P., Head of department	Address: 60/2, Grushevskogo Str, Korosten, Zhytomyr Region Phone: + 38 (04142) 4-10-30
6	Environmental department of Zhytomyr Regional Administration	Regulatory agency	Revenko O.M., Director	Address: 17/20, Teatralna str., Zhytomyr, Zhytomyr region
Media and internet				
7	Newspaper "Drevlianskyi Krai"	Local newspaper (Korosten District)	Editor-in-chief Klymchuk O.V.	Address: Zhytomyr region, Korosten district, Korosten town, Grushevskogo str., 60/2, of. 21 Phone: +38 (04142) 42-052
8	Web site http://korosten.osp-ua.info/	Local news site	Editor-in-chief	http://korosten.osp-ua.info/
NGOs and research community				
9	Environmental NGOs			

3 Disclosure of Information and Stakeholder Engagement Programme

3.1 Disclosure of Information Relevant to Project

To meet the environmental and social requirements and performance standards of EBRD, the Non-Technical Summary of environmental and social considerations (NTS) and the SEP (this document) are being disclosed to the public on developer’s web site www.teslaenergo.com, Facebook page www.facebook.com/LLC-Irshanska-SES-2006511222976160 and USELF framework site uself.com.ua.

Printed copies of the NTS and SEP will also be made available to the public at Meleni Village Council and from *Irshanska SES* offices upon request.

The local population will be receiving timely information about planned construction activities, safety measures in the vicinity of the construction site, traffic management, employment and business opportunities and other relevant information through the local media listed in the table above. Publicly shared information will also include summaries of annual project progress reports, incorporating environmental and social impacts, health and safety performance and implementation of the external grievance mechanism.

Any public comments or complaints will be reported following the grievance procedure described in *Section 4* below.

3.2 Stakeholder Engagement Programme

A provisional Stakeholder Engagement Programme is provided in the *Table 3.1* below. This programme will be further discussed by the parties involved, and updated accordingly.

Table 3.1 Provisional Stakeholder Engagement Programme

No	Stakeholder	Activity	Means of Communication	Timeframe
Project Preparation (Pre-construction) Phase				
1	All stakeholders	<ul style="list-style-type: none"> Publish NTS and SEP (in English and Ukrainian), and inform all stakeholders through local media 	<ul style="list-style-type: none"> Local media publications; Publications on web site. 	2019
2	Statutory stakeholders (regulatory agencies)	<ul style="list-style-type: none"> Obtain all necessary permits for project construction 	<ul style="list-style-type: none"> Official correspondence; Meetings. 	2019
3	Construction contractors, temporary workers	<ul style="list-style-type: none"> Agree construction related grievance management procedure and code of conduct for temporary workers; Provide training to contractors on the code of conduct. 	<ul style="list-style-type: none"> Meetings; Official correspondence; Trainings. 	Before the start of construction
4	Local population	<ul style="list-style-type: none"> Provide information on safety measures and traffic management procedures during construction; Provide information on employment 	<ul style="list-style-type: none"> Big boards at the construction site; Safety signs posted on roads 	Before the start of, and during, construction

		<p>opportunities and opportunities for service provision, if any;</p> <ul style="list-style-type: none"> • Provide information on construction related grievance procedure. 	<p>at dangerous sites;</p> <ul style="list-style-type: none"> • Newspaper announcements; • Web site announcements. 	
Construction Phase				
5	All stakeholders	<ul style="list-style-type: none"> • Provide information on implementation of the ESAP, SEP, revision of documents, and new impacts (if any); • Provide information on processing and responding to grievances. 	<ul style="list-style-type: none"> • Newspaper publications; • Web site announcements. 	Continuously during construction phase
6	Construction contractors, temporary workers	<ul style="list-style-type: none"> • Monitor the performance of contactors and their implementation of the agreed plans and procedures; • Provide additional training as required. 	<ul style="list-style-type: none"> • Meetings; • Official correspondence; • Trainings. 	Continuously during construction phase
7	Local population	<ul style="list-style-type: none"> • Collect and address any grievances. 	<ul style="list-style-type: none"> • Official correspondence; • Meetings. 	Continuously during construction phase
Operation Phase				
8	All stakeholders	<ul style="list-style-type: none"> • Ongoing interaction and cooperation with stakeholders; • Continue to provide information on the implementation of the ESAP; • Collect and address any grievances. 	<ul style="list-style-type: none"> • Media publications; • Meetings; • Correspondence. 	Throughout the lifetime of the project

3.3 Roles and Responsibilities

Irshanska SES will appoint a suitably qualified person who will have the overall responsibility for handling the consultation and information disclosure, including organisation of consultation process, communication with identified stakeholder groups, collecting and processing comments/complaints, and responding to any such comments and complaints. Depending on the nature of a comment/complaint, some of them may be forwarded to the appropriate person within the company for a response.

Name of the person and title	Affiliation and contact information
<i>Oleg Gramotenko</i> , Director General	Company: <i>Tesla Energo LLC</i> Postal Address: 10003, Zhytomyr Region, Zhytomyr, 81, Pokrovska Str. Phone: +38 044 333 72 18 Mobile phone: +38 067 411 411 2 E-mail: office@teslaenergo.com

4 Public Grievance Procedure

The objective of a grievance procedure is to ensure that all comments and complaints from any project stakeholder, including residents of nearby residential areas, *Irshanska SES* employees, contractors' staff, local/regional authorities and other interested parties, are considered and addressed in an appropriate, consistent and timely manner. All grievances will be acknowledged and responded to within a reasonable timeframe.

Irshanska SES will accept all comments and complaints associated with the project. A proposed template of a Comments and Complaints Form is shown in *Annex C*. The comments and complaints will be summarised and listed in a Complaints and Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate), and the date of response sent to the commenter/complainant. Any person or organisation may send comments and/or complaints in person or by post, email, or facsimile using the contact information specified in the Form.

All comments and complaints will be responded to either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will be reviewed and taken into account in the project preparation and implementation, however, they may not receive an individual response unless requested.

Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

All grievances will be registered and acknowledged within 5 days and responded to within 20 working days. *Irshanska SES* will keep a grievance log and report on grievance management, as part of annual project progress reports.

During construction, grievances in relation to construction activities will be managed by *Irshanska SES* and their construction contractor. People may also submit their complaints via the local government representation in Meleni Village Council.

Annexes A to B Copies of project publications in local media and public consultation minutes

Annex C Public Grievance Form (Form for public comments, complaints and reports)

Reference No:	
Full Name: Anonymous <input type="checkbox"/>	
Contact Information and Preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ By Telephone: _____ By E-mail _____
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem? Etc.
Date of Incident/Grievance	
	One time incident/ grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature: _____ Date: _____	
Please return this form to: <i>Oleg Gramotenko, Director General, Tesla Energo/ Postal Address: 10003, Zhytomyr Region, Zhytomyr, 81, Pokrovska Str. Phone: +38 044 333 72 18 Mobile phone: +38 067 411 411 2 E-mail: office@teslaenergo.com Web site: http://www.teslaenergo.com or</i> <i>Liudmyla Tsyselska, Director General, Irshanska SES Postal Address: 10003, Zhytomyr Region, Zhytomyr, 81, Pokrovska Str. Mobile phone: +38 068 959 93 86 E-mail: prokopovalm@gmail.com</i>	