



Windvision Windfarm A doo
Windvision Windfarm B doo

Stakeholder Engagement Plan (SEP)

168 MW Alibunar Windfarm, Serbia

25 October 2022

Project No.: 0616614

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Acronyms and Abbreviations

ANRE	The National Agency for Energy Regulation of the Republic of Moldova
CLO	Community Liaison Officer
DSO	Distribution System Operator
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
GM	Grievance Mechanism
LPA	Local Public Administration
OHS	Occupational Health & Safety
PIDP	Project Information Disclosure Package
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

1.1 Introduction

This document represents the Stakeholder Engagement Plan (SEP) for the 168 MW Alibunar Windfarm (the “Project”), located in Alibunar Municipality, Serbia.

This SEP establishes the framework by which stakeholders, and primarily local stakeholders, are informed about the Project and provided with opportunity to provide comments and input to the development of Project.

The SEP provides the guidelines to manage effective and meaningful engagement with stakeholders. It is focused on guiding interaction and communication with stakeholders concerned by the development of the Project and related studies, while setting the stage for future engagement during the construction, operation and decommissioning phases.

The SEP also includes a presentation of the Grievance Mechanism (GM) established for the Project.

The engagement approach taken by the Project is aligned with Serbian environmental permitting regulations, European Union (EU) Directive on public participation, the Aarhus Convention, as well as relevant international lender and best practice standards.

Stakeholder engagement is an ongoing process, and as such, this SEP is a living document and will be reviewed and updated as the Project progresses.

1.2 Background

The companies WindVision Windfarm A d.o.o and Windvision Windfarm B doo (both referred to as “WindVision” or “the Company”), intends to develop and operate the 168 MW Alibunar windfarm (hereinafter the “Project”) located approximately 50 km Northeast of Belgrade, on the territory of the municipalities of Alibunar, Pancevo and Kovacica in the south Banat region of the autonomous province of Vojvodina, in Serbia.

The windfarm was initially designed to be implemented in two phases, Alibunar A (or Alibunar 1) with 33 wind turbine generators (WTG) and Alibunar B (or Alibunar 2) with 25 WTG, however it underwent a number of revisions in terms of technical planning, capacity and layout.

In 2015 the European Bank for Reconstruction and Development (the “EBRD”) and the European Investment Bank (“EIB”) were considering providing financing for the Alibunar A phase. To meet EBRD and EIB requirements for stakeholder engagement and public consultation and disclosure, a Stakeholder Engagement Plan (“SEP”) was developed for Alibunar Wind Project A d.o.o. At the time, the international financing was not concluded, but the Project obtained the required permits under the Serbian law, based on the EIA study conducted in 2014.

In 2021, the Project reduced the number of WTG to 40 and opted for Vestas V150 of 4.2 MW nominal capacity, totalling the current capacity of 168 MW. The Project aims now to seek international financing for the Project, therefore the need for a supplemental study, including update of the SEP, to address project design changes since its authorization and to comply with the E&S requirements set by relevant financial institutions.

1.3 Scope of the SEP

In line with international good practice, the Project recognizes that stakeholder engagement constitutes the basis for building up constructive and strong relationships with all interested parties, which are essential for successful construction and operation of the windfarm and shared value creation.

The Company’s commitment to effective engagement translates in an ongoing process that involves different elements such as stakeholder analysis, planning, consultation and participation, grievance

management and ongoing reporting to affected communities, scaled to each development phase of the Project.

Key elements of this SEP include the following:

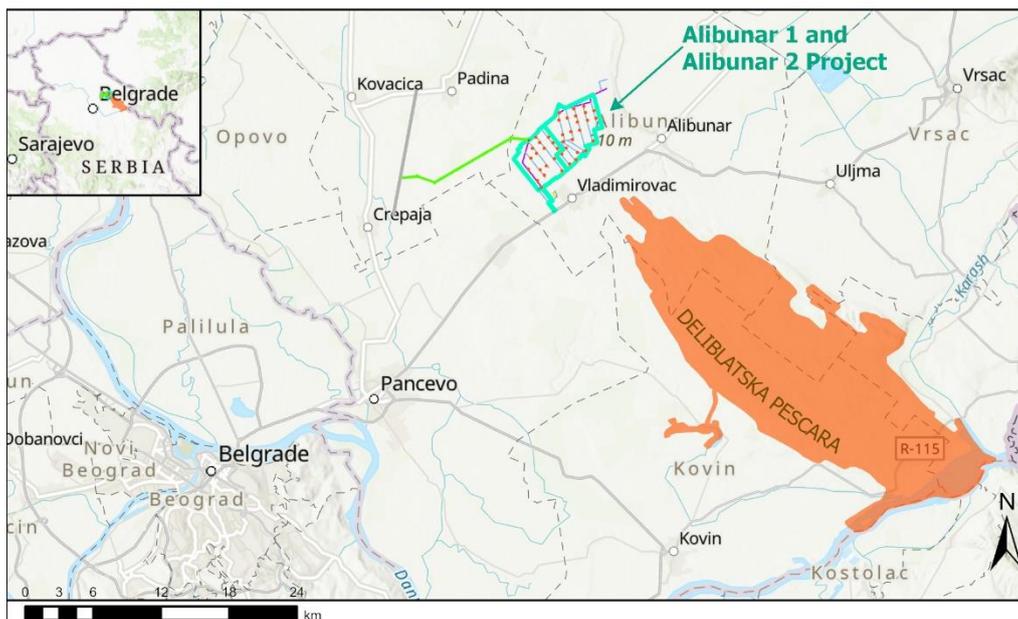
- company's commitment to effectively engage external Project stakeholders;
- description of national and international requirements for consultation and disclosure (see Section 3);
- brief summary of past engagement activities conducted by the Project since its inception (see Section 4);
- initial identification and characterization of stakeholders in order to determine appropriate ways of engagement (see Section 5);
- strategy and timetable for sharing information and consulting with stakeholders (see Section 6);
- tools for engagement (see Section 7);
- resources and responsibilities for implementing stakeholder engagement activities (see Section 8);
- external grievance mechanism for the Project (see Section 9) and
- description of how stakeholder engagement activities will be incorporated into the company's overall management system (see Section 10).

2. PROJECT DESCRIPTION

2.1 Project Location

The Project will cover an area of approximately 5,200 hectares of agricultural land, neighbouring the settlements of Seleus, Vladimirovac and Alibunar. The transmission line will cross the territory of Alibunar and Kovacica. The project site lies about 5km northwest of the proposed Emerald site RS000005 Deliblatska Pescara, which is a prospective Natura 2000 area. The area is particularly known for its bird populations, with several key species among its key conservation objectives.

Figure 2-1 Project location



Source: ERM, using Client data

2.2 Project Components and Design

The Project consists of the following key components:

- 40 wind turbine generators Vestas model V150 4.2 MW. The hub-height of the selected model is 105m. The Power Optimized mode is P01, which is as standard equipped with serrated trailing edges on the blades and has a maximum sound level of 104.9 dBA.
- Two substations of 35-220 kV for Alibunar 1 and Alibunar 2
- Substation 20 kV
- Transmission line 220 kV
- Concrete factory
- Materials warehouse (borrow pit)
- Grid connection (switch yard)
- Internal windfarm roads and connection to the state road
- Logistic area
- Optical fibre communication cable network

- Parking areas (truck parking and column segments loading area)
- Temporary crane stands & platforms

The key project components are described in more detail in the Supplementary ESIA Study - Appendix A - Project Description.

2.3 Summary of historical project changes

Starting 2021, the Project has a total installed capacity of 168 MW. The location of the WTG has not changed, but the number of WTG decreased to 40. See Figure 2-2 for details regarding the evolution of the design.

Figure 2-2 Project layout updated (2022)



Source: ERM, using Client data

2.4 Project Organization

The current Project Owner, Windvision Serbia Holding BV, is owned by WV International BV (50%) and by Emergy AS (50%). The partners will co-develop the Project up to financial close, at which point Emergy will buy 100% of the Project.

The project will be implemented by three contractors as follows:

- Wind Park BOP¹ (WPBOP): covering both civil works (foundations, roads, hardstands, etc.), and electrical works (cabling and substations within wind farm).
- WTG works: wind turbine generator supply and installation – Vestas

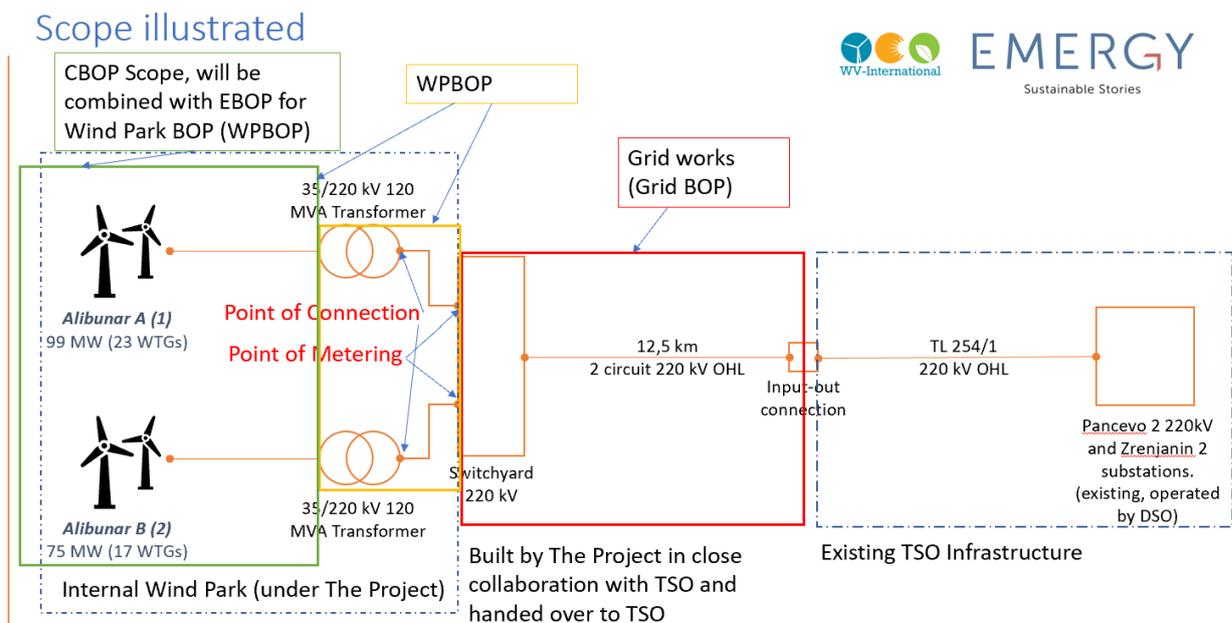
¹ The Balance of Plant (BOP) is a power engineering term which refers to the various supporting and auxiliary components of a power plant system required to produce energy.

- Grid BOP: construction of 12,5 km overhead grid connection line and switchyard

With the exception of Vestas, the other two contractors have not yet been engaged by the Client, however the process has been initiated.

Following diagram shows an overview of the works allocated to each contractor for the project implementation:

Figure 2-3 Overview of project construction lots



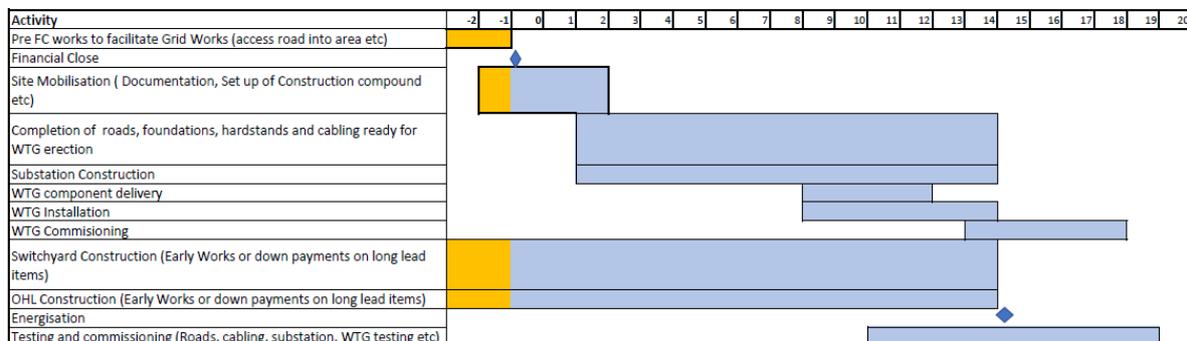
Source: the Client

2.5 Project schedule

The initial stage of construction is currently expected to start in Q4 2022, with envisaged completion date in Q2 2024.

The tentative project timeline for the construction phase is currently as follows:

Figure 2-4 Project timeline



The operational life of the project is expected to be about 25 years, after which the wind park will be refurbished or decommissioned and removed.

2.6 Other Developments in the Aol

There are several operational wind farms in the project Area of Influence (Aol) considered for the Cumulative Impact Assessment (CIA), with numerous other WFs at various stages in the permitting / authorisation process. Following are the existing operational and planned Wind Farms in the Aol:

- Five WFs are already operational, with an estimated combined power capacity of 373 MW, provided by 139 WTGs in total.
- An additional 18 WFs are planned, at various phases of permitting, with a total estimated combined power capacity of 2 404 MW (~2.4 GW) anticipated.

Should all projects be authorised and developed, the total power capacity is estimated to be in the region of 2 777 MW (~2.8 GW). The phasing of construction is likely to be in 3 distinct but overlapping phases for the remaining projects: 2023 – 2025, 2024 – 2026 and 2025 – 2027 (based on an average estimated construction period of 24 months).

The assessment of the potential cumulative impacts to be caused by the combination of these multiple projects in the Aol was conducted in the frame of the Supplemental ESIA Package and the corresponding Cumulative Impact Assessment (CIA) performed, being this part of the Project Information Disclosure Package (PIDP).

3. NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

3.1 Serbian Legal Requirements

As the highest legal act in the country, the **Constitution of the Republic of Serbia** (2006) provides people with rights in relation to truthful, complete and timely access to information and participation on issues of public importance, as well as the right to appeal or use other legal remedies to protect their rights and submit suggestions/complaints to public authorities. These provisions are further detailed in the **Law on Free Access to Information of Public Importance**.

As a first step, disclosure and consultation steps are undertaken under the **Law on Planning and Construction** of the Republic of Serbia for the development and adoption of spatial and urban planning documents, including detailed regulation plans. The disclosure and consultation requirements are described in detail in the **Regulation on the Content, Manner and Procedure for the Development of Planning Documents**. The process is almost identical to the one for the approval of EIAs.

Serbian legislation on environmental protection, including the **Strategic Environmental Impact Assessment Law** and the **Environmental Protection Law**, require the public to be informed about and involved in all matters concerning the environment. Public disclosure and consultation procedures are organised in connection to the development of project environmental impact assessments (EIAs) as per the **Rules for Disclosure of Information, Presentations and Public Consultations Regarding EIAs**.

Following disclosure and consultation activities are undertaken by the authorities before the approval of the EIA:

- Informing the public through the media about details of disclosure of the draft EIA (i.e., where the electronic version and hard copy are available for review, the dates and time when the hard copy can be reviewed) and inviting citizens/organisations to submit comments and/or attend a public hearing during the disclosure period. Citizens can request that their comments are responded to in writing;
- Organising a public hearing to present the draft EIA (usually in the town hall or other appropriate local venue) during the disclosure period;
- Processing comments received from all stakeholders and revising the EIA to reflect them, as well as preparing a report to justify why certain comments were not adopted;
- Submission of the revised EIA and report to relevant authorities (Ministry) which judge whether the comments have been meaningfully considered and addressed.
- Disclosing the EIA Decision on the website of the responsible Ministry.

3.2 International Legal Requirements

3.2.1 Aarhus Convention

The United Nations Economic Commission for Europe (UNECE) *Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters* was adopted on 25 June 1998 in the Danish city of Aarhus (Århus) at the Fourth Environment for Europe Ministerial Conference. It entered into force on 30 October 2001. The Aarhus Convention was

created to empower the role of citizens and civil society organisations in environmental matters and is founded on the principles of participative democracy².

The Convention establishes a number of rights to the individuals and civil society organizations with regard to the environment:

- **Access to information:** public's right to receive environmental information held by public authorities. This includes information on
 - the state of the environment
 - policies or measures affecting the environment
 - public health and safety where these are affected by the state of the environment
- **Public participation:** public's right to participate in environmental decision-making. Public authorities are required to allow the general public and environmental NGOs to meaningfully participate in decision-making regarding projects affecting the environment and plans and programmes relating to the environment.
- **Access to justice:** public's right to review by a court or another independent body to ensure that public authorities respect the rights to access to information and public participation, and environmental law in general.

The Aarhus Convention was ratified by Serbia on 31 July 2009 and entered into force on 29 October 2009. In this regard, Serbia, as signatory of the Convention, is required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights becoming effective.

3.3 International Lender Requirements

The International Financing Corporation (IFC) Performance Standards (PS) are considered a benchmark for good practice for environmental and social risk management in private sector developments. These standards require that clients engage affected communities through disclosure of information, consultation, and informed participation, in a manner commensurate with the risks to and impacts of the Project on the affected communities.

Additionally, these international standards include specific guidance on conducting stakeholder engagement both during the planning phase and through the project lifecycle.

Stakeholder engagement requirements are outlined in IFC PS1: Assessment and Management of Environmental and Social Risks. The key requirements for consultation and disclosure through the life of the project are summarized in Figure 3-1 below.

² [The Aarhus Convention | OSCE Aarhus](#)

Figure 3-1 Outline of stakeholder engagement requirements

Stakeholder Analysis and Engagement Planning

Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and on-going reporting to Affected Stakeholders.

Disclosure of Relevant Project Information

Provide affected stakeholders with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such stakeholders and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.

Consultation

Consultation will be in line with the degree of impact of the Project and should: i) begin early and continue through project, ii) be based on prior disclosure of relevant and easily accessible information on the project, iii) focus engagement on those who are directly affected, iv) be free of outside interference and external manipulation, v) enable meaningful participation, vi) be documented.

Informed Consultation and Participation

For projects with potentially significant adverse impacts on affected stakeholders, conduct an informed consultation and participation process. It should involve deep exchange of views and information, and an organized and iterative consultation, leading to the project incorporating into their decision-making process the views of the affected stakeholders on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The process should be documented, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected stakeholders. The stakeholders should be informed about how their concerns have been considered.

External Communications

Implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.

Grievance Mechanism for Affected Stakeholders

Establish a grievance mechanism to receive and facilitate resolution of affected stakeholders' concerns and grievances about the client's environmental and social performance.

On-going Reporting to Affected Stakeholders

Provide periodic reports to the affected stakeholders that describe progress with implementation of the project Action Plans on issues that involve on-going risk to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism have identified as a concern to those stakeholders. The Performance Standards require that after completion of an environmental assessment the consultation and disclosure must continue throughout the life cycle (construction and operation phase) of the project.

The other IFC Performance Requirements (PS) have stakeholder engagement and consultation requirements to manage specific impacts. These are presented in Table 3-1 below.

Table 3-1 Other Relevant IFC PSs

Standard	Key Components
PS 2: Labour and Working Conditions	<ul style="list-style-type: none"> ■ Recognizes that the pursuit of economic growth through employment creation and income generation should be balanced with the protection of basic rights for workers. ■ Acknowledges that constructive worker-management relationship and safe and healthy working conditions may enhance the efficiency and productivity of operations. As such, requires engagement between projects and their workers including mechanisms for workers to report grievances.
PS 4: Community Health, Safety and Security	<ul style="list-style-type: none"> ■ Recognizes that project activities, equipment and infrastructure bring benefits to communities including employment, services and opportunities for economic development. However, the project can also increase the potential for community exposure to risks from development. ■ Where project activities pose risks of adverse impacts on the health, safety and security of affected communities the owner is required to make available relevant information (including the details of an Action Plan), in an appropriate form, to affected parties and government authorities so that they can fully understand the nature and extent of the risks.
PS 5: Land Acquisition and Involuntary Resettlement	<ul style="list-style-type: none"> ■ Recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. ■ Where the Project will affect host communities, it will consult with and facilitate the informed participation of affected persons and communities in decision making process related to resettlement³.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> ■ Recognizes that protecting and conserving biodiversity in all its forms is fundamental to sustainable development. ■ Where the project has potential impacts on legally protected or critical habitats consultation with relevant authorities, specialists and communities must be undertaken.
PS 8: Cultural Heritage	<ul style="list-style-type: none"> ■ Recognizes the importance of cultural heritage for current and future generations and is consistent with the convention concerning the protection of the world's cultural and natural heritage. ■ Where sites of cultural heritage are potentially impacted (i.e. graveyards) by the project the owner will consult with local communities as well as relevant national authorities responsible for the maintenance of such sites.

³ The Project does not involve resettlement

4. SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT

4.1 Previous stakeholder engagement

WindVision has engaged stakeholders since 2011, both informally through their local representative and formally in official meetings with government institutions, regulatory consultation meetings with the public or public disclosure sessions organised in 2015. Find below a summary of key engagement activities and their outcomes.

Engagement during project development (2011 – 2014)

Stakeholder engagement was particularly intense throughout the environmental and social appraisal process from July 2011 to October 2012. The purpose of these activities has been to inform and hear concerns of landowners, government institutions, and the public about the project and relevant environmental and social issues

The formal consultation process and public involvement were undertaken as part of the administrative procedure for approval of the Location Permit in 2013 and the Alibunar A and B national EIAs. In accordance with Serbian law, both processes were organized by the Provincial Secretariat for Urban Planning, Construction and Environment. For Alibunar A, two public hearings have been held to date, both in Alibunar: for the Location Permit on 13 September 2011 and for the EIA on 15 January 2014. For Alibunar B, the public hearing for the EIA took place on 11 June 2014.

Please see Table 4-1 for a summary of key stakeholder concerns raised during this Project phase.

Table 4-1 Key issues raised by stakeholders (2011 – 2014)

Stakeholder group	Key issues raised
Landowners and local population	<ul style="list-style-type: none"> ■ Land acquisition/leasing and compensation, loss of agricultural land ■ Nuisance due to construction activities (dust dispersion, noise and traffic) ■ Nuisance due to operational activities (noise).
Municipal authorities and public utilities	<ul style="list-style-type: none"> ■ Spatial and urban planning aspects (proposed project vis à vis existing and planned municipal spatial / urban plans) ■ Transport issues during project construction ■ Improvement of existing local roads within the project development site.
Key Provincial authorities	<ul style="list-style-type: none"> ■ Provincial Secretariat for Urbanism, Building and Environmental Protection: <ul style="list-style-type: none"> - Spatial / urban and location permitting of the proposed wind farm - Adequacy and approval of the environmental impact assessment - Requirements for issuing a construction permit - At all stages, adequate participation/input by national, provincial, and local authorities (transport, civil aviation, telecommunications, municipality, etc.) ■ Institute for Nature Conservation of Vojvodina Province:

Stakeholder group	Key issues raised
	<ul style="list-style-type: none"> - Adequacy of the biodiversity impact assessment as part of the overall EIA - Impacts to the fauna of birds and bats in the project area and mitigation /offset measures and operational monitoring - Cumulative impacts due to increasing wind farm developments in Vojvodina Province.

Additionally, a local office was established in the centre of Alibunar in 2012, which is serving both Alibunar and Banat wind developments.

A dedicated Local Manager, present on a daily basis, is responsible to maintain communication with all external stakeholders: local community, farmers or Municipality. The Local Manager is a local, living in the community, who is well connected to the extended community.

Engagement during ESIA Disclosure (2015)

The ESIA disclosure conducted in the context of attracting EBRD financing for the Project in 2015 involved public disclosure of the full ESIA package, including Project Stakeholder Engagement Plan (SEP), Non-Technical Summary (NTS), Environmental and Social Action Plan (ESAP), EIA (2014, Alibunar A) and ESIA Report (2013).

The documents were disclosed in Serbian and English languages in the settlements of Alibunar, Pančevo, Vladimirovac, Seleuš and Banatsko Novo Selo.

No additional concerns were raised by local stakeholders during the disclosure period.

Engagement during 2015 – 2022

Engagement with local stakeholder continued following the 2015 disclosure.

All matters of stakeholders' interest, including those land-related, were addressed directly by the stakeholders at the local office in Alibunar. A lack of traction among the local population to use formal grievance mechanisms can be noted, as the local stakeholders prefer face to face interaction for raising queries and grievances.

Negotiation on land acquisition was continuous and was initiated by receiving a letter from the company about the Project implementation. This was followed by close dialogue with the Local Manager, who is the main contact point for the Project, including for land aspects.

For the Roads network, there were dedicated meetings with the farmers, at the time the contracts were signed (2017 – 2019).

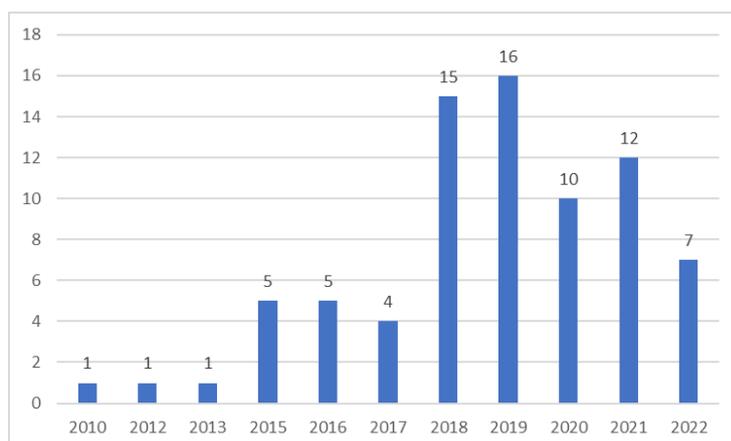
Additionally, Windvision supported small local initiatives and events, on an ad-hoc, responsive basis. Average donations were between 400 and 3000 Euro and many of the organisations were supported for several years in a row. From 2010 until 2022, a total of 77 donations were made by the company to the following recipients:

- Alibunar Municipality, Seleus and Alibunar Local Community
- Sports organisations: Football Club "Buducnost" Alibunar; Football club "Proleter" Banatski Karlovac; Football club Seleus; Handball club "Buducnost" Alibunar; Golf Club; Japanese martial arts club "Gosinka" Vrsac; Karate club Vladimirovac; Sports association Municipality Alibunar
- Hunting and fishing associations: Hunting Association "Fazan" Vladimirovac; Hunting Association "Srmdac" Alibunar; Hunting Association Seleus; Association of bird breeders "Golub 1985" Alibunar; Association of Sport Fishermen Pescara; Association of Sport Fishermen Smudj Alibunar

- Elementary School "Prvi Maj" Vladimirovac
- Cultural associations: Theater "Konu Aleku" Alibunar; Serbian Orthodox Church Vladimirovac
- Others: Independent Police Union Alibunar; Red Cross Alibunar; Women's association "Karlovcanke" Banatski Karlovci

Most donations were made in the period 2018 to 2019, however they continued until the time this plan was elaborated – see Figure 4-1 below for details.

Figure 4-1 Donations to local organisations



4.2 ESIA 2022 Engagement

A field visit took place on the 7th of December 2021 in the context of the ERM Environmental and Social Due Diligence process and included observation of the Project area and a limited number of stakeholder interviews, organised with due consideration to Covid19 safety requirements:

- Face-to-face meeting with representatives of the Alibunar Municipality;
- Face-to-face meeting with a group of 8 landowners;
- Online interview with representatives of SPTC Srbije, an established Serbian nature conservation NGO, member of the BirdLife International partnership since 2018.

As part of developing the Supplementary ESIA Study (2022), a socioeconomic and health baseline qualitative data collection field survey was undertaken by ERM on the 6th, 7th and 8th of July 2022 in Alibunar Municipality. This included field observations and ground truthing and key informant interviews and focus group discussions in the settlements of Seleuš, Vladimirovac and Alibunar. The goal of these activities was to collect baseline information on perceived socioeconomic and health factors and engage around key potential risks and opportunities associated with the Project, but also feedback on past engagement and suggestions for improving engagement in the following Project phases.

Out of the 63 participants in these meetings, 25 were women (approximately 40%).

The meetings consisted of:

- Key Informant Interview (KII) with relevant stakeholders (elected community representatives, land owners, local associations, representatives of the local health centre and police department;
- Focus groups discussions with Hunting Association and Women Association in Vladimirovac;
- Public meeting with landowners impacted by the land acquisition.

Table 4-2 Key issues raised by stakeholders (2021 – 2022)

Stakeholder group	Key issues raised
Landowners and local population	<ul style="list-style-type: none"> ■ Overview on the compensation process; all participants stated that contracts are more than beneficial for them; ■ The Land owners showed their fully trust for the company as they are sure that if something unpredicted happen the company will handle; ■ Regarding positive impact they mentioned construction of roads; ■ Key point of contact is the Local Manager from Alibundar, who is in charge with communication with land owners and solving all possible issues;
Alibunar Municipality	<ul style="list-style-type: none"> ■ The participants stated that all information about the project was shared with the inhabitants through various communication channels; ■ Benefits of the project: the importance of gaining from taxes, the importance of the road network modernisation and also the perception that that the windfarm will attract tourists; ■ People are talking favourably about the project even though at the beginning the inhabitants had some doubts it would be beneficial;
Public institutions: Alibunar Health Centre; Alibunar Police	<ul style="list-style-type: none"> ■ No perceived impacts from the operational windfarms, including occupational health and safety incidents during construction works ■ Traffic management to be organised in collaboration with local police. Suggestions: to organise heavy traffic transport during the night in order minimise interruption or delay of current traffic flows ■ Contractor behaviour: the community is multi-ethnic and tolerant, so there should be no issue if foreign workers will come during construction ■ The Police has no contact with the other wind developer and no information about their activity.
Conservation NGOs: SPTC Srbjie	<ul style="list-style-type: none"> ■ Concerns about the development of the wind industry in Serbia ■ Species of particular concern in Alibunar area; ■ the results/ trends observed according with the monitorings that had been undertaken in the past years ■ Survey methodologies used by the wind developers; the difference between international standards and the local ones ■ The opportunities and programs that could be used to mitigate the impacts of the windfarms
Local communities of Alibunar, Seleus and Vladimirovac	<ul style="list-style-type: none"> ■ Local stakeholders are mostly in favour of the Project implementation, particularly landowners who benefit from the leases ■ For the community at large, the new roads are considered a big advantage for local farmers ■ As other wind projects were already implemented in the community, people are now aware of the type of impacts associated and less concerned than they were when first project were proposed

Stakeholder group	Key issues raised
	<ul style="list-style-type: none"> <li data-bbox="395 293 1351 360">■ Issues related to accidental damage during construction came up in the past, but these were resolved and landowners were compensated <li data-bbox="395 376 1351 409">■ No negative impacts perceived in relation to the wind industry
Hunting associations (Vladimirovac and Seleus)	<ul style="list-style-type: none"> <li data-bbox="395 450 1351 483">■ No impact on the hunting activity

5. STAKEHOLDERS

5.1 Stakeholder Identification

IFC's Stakeholder Engagement *Good Practice Handbook for Companies Doing Business in Emerging Markets* defines stakeholder(s) as *any individual or group who is potentially affected by a project or activity or who has an interest in the project or activity, and/or the ability to influence its outcome, positively or negatively*. The objective of stakeholder identification is therefore to establish which organizations and individuals may be directly or indirectly affected (positively and negatively), or have an interest in the Project and its activities.

Stakeholder groups and communication methods identified to date are included in ***Error! Reference source not found.*** below. The communication methods will be tailored depending on each stakeholder group in order to allow adequate information disclosure and enable participation in the decision-making process

Table 5-1 Stakeholder Groups

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
<p>National and Provincial Government National Government is of primary national political importance to the business and/or projects/activities in terms of establishing policy, granting permits or other approvals, and monitoring and enforcing compliance with Serbian regulations throughout all stages of the Project life cycle.</p>	<ul style="list-style-type: none"> ■ National Government ■ Key Ministries ■ National Regulatory bodies 	<ul style="list-style-type: none"> ■ Ministry of Construction, Transport and Infrastructure ■ Ministry of Environmental Protection ■ Ministry of Mining and Energy ■ Ministry of Labour, Employment, Veteran and Social Affairs ■ Ministry of Culture and the Media ■ Institute for Nature Conservation of Vojvodina Province ■ Provincial Secretariat for Urbanism, Building and Environmental Protection 	<p>Communication with authorities will follow established procedures in line with Serbian legislation and regulations.</p>
<p>Local Public Administration Local government is of importance to the business or and/or project as they are responsible for implementation of legislation, and development plans and policies at the municipal or commune level. In addition, the municipalities and/or communes in the Project area will be impacted by the Project and will need to be kept informed of progress and plans in their area, to consider the Project activities in their policy-making, regulatory and other duties and activities.</p>	<ul style="list-style-type: none"> ■ Local Mayors ■ Local Self Government ■ Local inspectorates and public utilities (spatial & urban planning, cadastre, communal affairs, environment, roads, etc.) 	<ul style="list-style-type: none"> ■ Local Mayors from Alibunar, Kovacica, Pancevo, Plandište, Vršac and Kovin ■ Local Self-Government in Alibunar Municipality – Presidents of Vladimirovac, Seleus, Alibunar, Novi Kozjak ■ Local Self-Government in Kovacica Municipality: Presidents of Crepaja, Kovacica and Padina ■ Local Self-Government in Pancevo Municipality – Banatsko Novo Selo 	<p>Communication with authorities will follow established procedures in line with Serbian legislation and regulations.</p>
<p>Parastatals Parastatals may have land or other assets within the country (electrical</p>	<ul style="list-style-type: none"> ■ Government funded and/or private enterprises in charge of managing specific activities 	<ul style="list-style-type: none"> ■ Elektromreža Srbije” EMS (including EPS - Pančevo branch) ■ Other utility providers. 	<ul style="list-style-type: none"> ■ Communication with Parastatals will follow established procedures in line

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
<p>grid, public roads), which could be affected by the project or activity, or whose assets are influencing the project/activities (underground pipelines /overhead lines crossing the project areas).</p>			<p>with Serbian regulations.</p> <ul style="list-style-type: none"> ■ Project section on Company website ■ Formal notifications
<p>Communities or Settlements Households and communities that may be directly or indirectly affected by the Project. This includes people living on land affected by the Project, through direct land take or by social and environmental impacts, and other people who visit or use land or resources that may be affected. Primary stakeholders include landowners and land users.</p>	<ul style="list-style-type: none"> ■ Land-affected stakeholders ■ Local population affected in some form by the project/activity, including Project traffic 	<ul style="list-style-type: none"> ■ Landowners and users in Alibunar and Kovacica Municipalities ■ People living near the project site in Vladimirovac, Seleus and Alibunar ■ Residents of settlements located near roads used for project activities, such as transporting materials during construction and operation, contractor and supplier vehicles: Pancevo, Banatsko Novo Selo, Vladimirovac ■ Social / public infrastructure and service companies: Alibunar Health Centre; Alibunar Police 	<ul style="list-style-type: none"> ■ Communication with local residents around Project operations and activities will be agreed with Alibunar Municipality and other relevant bodies, and subject to comment by the public involved. ■ Local communication will focus on disclosure of information, meetings with relevant authorities and councils, and implementation of the grievance mechanism.
<p>Vulnerable Persons/Groups Vulnerable groups may be affected by the project or activity by virtue of their physical disability, social or economic standing, limited education, lack of employment or access to land.</p>	<ul style="list-style-type: none"> ■ Vulnerable groups 	<ul style="list-style-type: none"> ■ Ethnic Minority Groups ■ Female-headed households, including single mothers and widows, as they do not have access to the same livelihood activities as men and therefore they are often reliant on assistance from family members or the state in order to survive ■ Low-income households – due to limited access to resources, like savings and access to credit and more likely lower education levels, which makes it harder to access project benefits; 	<ul style="list-style-type: none"> ■ Once the Company identifies vulnerable groups and/or individuals, these will be engaged with to identify any specific information or consultation needs

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
<p>Appropriate engagement practices and tools will be adopted to ensure the identification of vulnerable groups and their adequate access to information and participation.</p>		<ul style="list-style-type: none"> ■ Unemployed youth. Reliance on other household members means that youth are often disenfranchised and less able to take advantage of positive project impacts ■ Elderly people living alone, in remote areas ■ Disabled persons 	<p>in order to take any concerns or impacts into account.</p> <ul style="list-style-type: none"> ■ Communication will be tailored based on their needs.
<p>Non-Governmental Organizations (NGOs) NGOs with direct interest in the Project and its social and environmental aspects and that are able to influence the project and/or activity directly or through public opinion.</p>	<ul style="list-style-type: none"> ■ International ■ National ■ Local 	<ul style="list-style-type: none"> ■ Environmental NGOs: SPTC Serbia, EKOP, BirdLife Serbia ■ Red Cross ■ Hunting associations (Alibunar, Vladimirovac, Seleus) ■ Womens' associations (Alibunar, Vladimirovac, Seleus) ■ Sports associations ■ Farmers associations 	<ul style="list-style-type: none"> ■ Company website ■ Formal consultation mechanisms
<p>Other interest groups Regional and national level media will typically have a higher level of influence over the Project and may be leveraged to influence local stakeholders' perceptions of the Project.</p>	<ul style="list-style-type: none"> ■ Media ■ End customers 	<ul style="list-style-type: none"> ■ Regional and national radio stations ■ Regional and national newspapers ■ TV stations ■ Internet ■ End customers purchasing electricity 	<p>Communication with the media will be done through the Company website, press releases, and newspaper announcements.</p>
<p>Potential partners Organizations, businesses and individuals with direct interest in the Project e.g. running businesses or providing services and supplies to the project.</p>	<ul style="list-style-type: none"> ■ Employees ■ Contractors and subcontractors ■ Suppliers ■ Other businesses operating within the region/villages ■ Company shareholders (for example, lenders) 	<ul style="list-style-type: none"> ■ Other Windfarm Operators in the area: Fintel Energija; Elicio; Masdar; Enlight K-2 Wind, CWP, MASDAR ■ Companies operating in the Project area: e.g. Scarpa, Rotoplast ■ Vestas, Civil and Electrical Contractors ■ IFC, EKF 	<p>These groups need to be covered in different plans and procedures, including information disclosure and grievance mechanism. They are not covered in this document.</p>

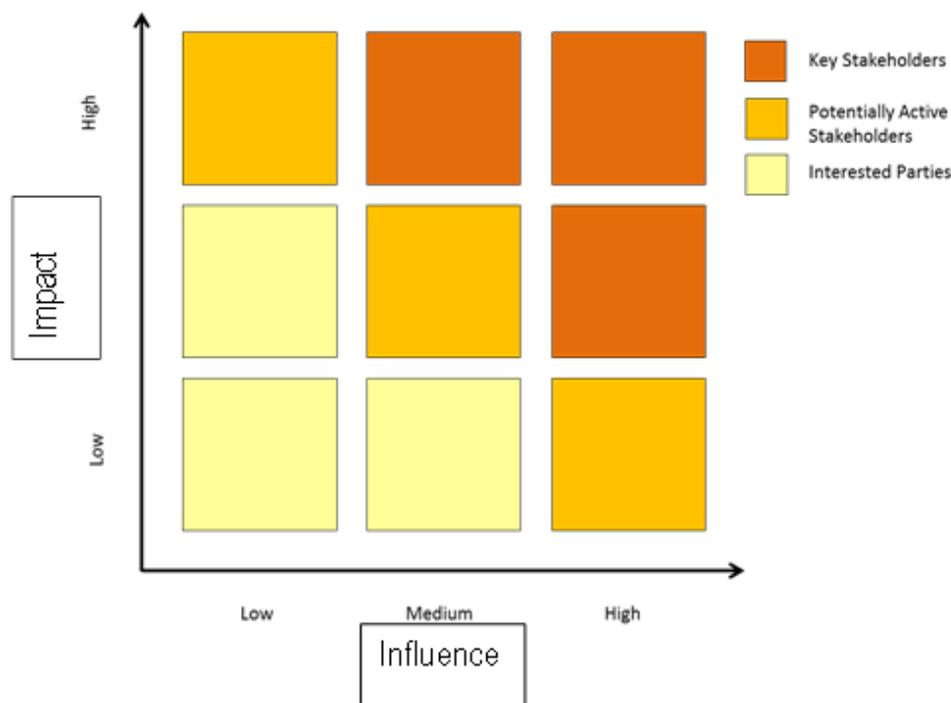
5.2 Stakeholder Analysis

In order to develop tailored and effective means of engagement with each category of stakeholders (see **Error! Reference source not found.** above), the Company will undertake an analysis and mapping of the identified stakeholders such that engagement are tailored to meet their interest in the Project and their likely key issues of interest. Stakeholders will be mapped according to the following:

- **Influence on the Project:** Influence refers to the power that the stakeholders have in relation to either decisions taken by, or affecting the Project. This power may be in the form of formal control over the decision-making process or it can be informal in the sense of protesting against, blocking or allowing project operations to continue.
- **Interest:** Interest refers to the connection between the stakeholders and the Project – for example, stakeholders may have something to either gain or lose because of Project implementation. Understanding stakeholders’ level of interest can help clarify their motivations and the ways in which they might be able to influence the project.

Stakeholders will be mapped using the matrix presented in *Figure 5-1* below and the level of engagement will be defined in accordance with *Figure 5-2* below.

Figure 5-1 Stakeholder Mapping Matrix



Note: Stakeholder mapping is an internal exercise to inform this SEP and will not be publicly disclosed. It is to be noted that the positions of stakeholders may change over time as the project progresses and, as part of regular updates of the SEP, the stakeholder map will be reviewed and updated as appropriate. In addition, any new stakeholders identified will be added to the map.

Figure 5-2 Engagement tactics for mapped stakeholders

Low	1	Monitor
Medium	2	Keep informed/ satisfied
High	3	Manage closely

6. STAKEHOLDER ENGAGEMENT ACTION PLAN

The stakeholder engagement program included in this SEP is intended to cover specifically the pre-construction phase and to provide a high-level outline for the subsequent phases of the Project, namely construction, operation and decommissioning. *Table 6-1* below provides a snapshot of engagement objectives and activities during each Project phase. The list below is not exhaustive and can be amended depending on feedback received from relevant stakeholders.

Table 6-1 Engagement Objectives and Activities during each Project phase

Project Phase	Engagement Objectives	Engagement activities
Pre-construction	<ul style="list-style-type: none"> ■ Identify relevant stakeholders; ■ familiarise the stakeholders with the Project; ■ secure all land required for the Project; ■ manage expectations; ■ obtain social licence to operate; ■ obtain requisite licences and permits; ■ disclosure and participation on EIA process: impacts and mitigations. ■ disclosure and dissemination of the Project external grievance mechanism; ■ receive, record and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ appointment of a Community Liaison Officer (CLO) and dissemination of contact details with the stakeholders (ongoing); ■ announcements of public meetings; ■ meetings as part of the EIA/ ESIA disclosure and public hearing process; ■ dissemination of grievance mechanism information sheet, hardcopies of grievance forms; ■ meetings to discuss impact mitigation measures, e.g., for traffic, land, etc;
Construction	<ul style="list-style-type: none"> ■ update stakeholders on progress, eg main construction milestones; ■ maintain social licence and consolidate trust; ■ manage expectations; ■ obtain requisite licences and permits; ■ receive, record and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ update SEP for construction phase; ■ regular announcements of key construction milestones, major equipment delivery schedule, planned interruptions of, for example, local traffic; ■ dissemination of grievance mechanism information sheet, hardcopies of grievance forms; ■ meetings for the Community Investment Plan preparation and implementation; ■ meetings / newsletter to report on Project progress and E&S performance;
Operation	<ul style="list-style-type: none"> ■ update stakeholders on progress and performance; ■ renew licences and permits; ■ maintain social licence and consolidate trust; ■ obtain requisite licences and permits; ■ manage expectations; ■ receive, record and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ update SEP for operation phase; ■ meetings / newsletter to report on Project progress and E&S performance; dissemination of grievance mechanism information sheet, hardcopies of grievance forms; ■ meetings for the Community Investment Plan preparation and implementation;
De-commissioning	<ul style="list-style-type: none"> ■ inform stakeholders on decommissioning works (activities, schedule, staff retrenchment, disposal of materials); ■ obtain requisite licences and permits; ■ manage expectations; ■ receive, record and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ update SEP for decommissioning phase; ■ dissemination of grievance mechanism information sheet, hardcopies of grievance forms; ■ meetings as part of the local permitting process.

Some planning and engagement activities will be ongoing throughout the entire Project cycle and they include the following:

- regular update of the Project stakeholders as the Project moves forward and activities, schedules and milestones evolve;
- regular update and revision of the stakeholder register including stakeholder analysis and re-evaluation as necessary throughout the different Project phases;
- addressing comments, questions and grievances regularly and through appropriate channels, and issuing information to stakeholders. This includes regular refreshers to stakeholders about the Grievance Mechanism and related processes.
- regular reporting to the different stakeholders as appropriate (see Section 10).

The following section describes the planned engagement during the pre-construction phase and, to a higher-level, construction and operation phases. The latter ones will be further planned and detailed into updated versions of this SEP, developed as the Project progresses and reflecting the results of engagement already conducted

Table 6-2 Engagement Action Plan

Engagement Activity	Target stakeholder group(s)	Description	Timing / Frequency	Responsibility
Pre-construction phase				
Project Information Disclosure Package (PIDP) is published online on the Company website	All stakeholders	<ul style="list-style-type: none"> ■ The PIDP will include the following documents in an accessible format (PDF): <ul style="list-style-type: none"> ■ Supplemental ESIA and Annexes – in English; ■ Stakeholder Engagement Plan (SEP), including the Grievance Mechanism for the Project – in both English and Serbian; ■ Non-technical Summary (NTS) – in both English and Serbian; ■ Grievance Form – in both English and Serbian. ■ These documents will be made available on the dedicated Project website. ■ The Project website will include details for written submissions: <ul style="list-style-type: none"> ■ e-mail address ■ postal address 	<p>All materials will be available online for stakeholder review and comments for at least 20 days prior to the public hearings date.</p> <p>All documents will remain available online thereafter; however, submissions with regard to the content of the EIA Reports will no longer be accepted past the public review date. The grievance mechanism and forms will remain available for use throughout the Project lifetime.</p>	Company
Project information disclosure package is made available in hard copy in key locations, in local language.	All stakeholders	The Project Information Disclosure Package (Supplemental ESIA in English and SEP, NTS and Grievance Form in Serbian) in hardcopy	All materials will be available in hard copy format for stakeholder review and comments for at least 20 days	Company

Engagement Activity	Target stakeholder group(s)	Description	Timing / Frequency	Responsibility
		format, along with Grievance Forms, will be made available to the public in the Town Halls of Alibunar, Kovacica and Pančevo municipalities , and in other public locations in the affected settlements and communities.	prior to the public hearings date. Grievance Forms to be available for use throughout the Project lifetime.	
Set-up of a Project Information Hotline	All stakeholders	A serviced Project Information Hotline will be available during normal business hours to all stakeholders during the environmental review process. The details will be advertised via the communication channels described in this SEP (Project webpage, publication of notices, public hearings).	Hotline will be operational for at least 20 days prior to the public hearing and furthermore 90 days after the public hearing, as a minimum.	Company
Conduct public hearings in the affected communities	All stakeholders	The Company will initiate and organise at least one public meeting in each affected villages to present the PIDP and address concerns and comments from the public relating to the Project implementation. The issues raised by the public will be captured and included in the following SEP update (covering Construction phase of the Project).	As soon as possible once the Project Information Disclosure Package (PIDP) is completed.	Company

Engagement Activity	Target stakeholder group(s)	Description	Timing / Frequency	Responsibility
Formal notices publication	All stakeholders	<p>The public hearings will be announced in local newspapers at least 20 days prior to the date and will include key information about the EIA results, along with all the details for stakeholders to access PIDP online and offline. Additionally, notice boards with information about the public hearings will be posted in key locations in the area impacted by the Project.</p> <p>All notices will be published in Serbian, Romanian and Slovak language.</p>	At least 20 days prior to public hearings date.	Company
Appointment of Community Liaison Officer (CLO) to act as key contact person for local communities and regular communication with local communities.	Local communities	<p>The Company will designate a Community Liaison Officer (CLO) from the Project's HSE team, with extensive experience in community relations of local construction projects in Serbia. The CLO will be responsible for the communication with the local communities and managing the grievance mechanism (receiving, recording and resolving communities' grievances). CLO contact details are in section 8:</p>	<p>Appointment of CLO: prior to disclosure of EIA package, since CLO contact details shall be included in the SEP / GM.</p> <p>Regular communication with local communities: throughout preconstruction phase (and all project phases).</p>	Company

Engagement Activity	Target stakeholder group(s)	Description	Timing / Frequency	Responsibility
Disseminate Grievance Mechanism (GM)	All stakeholders	The Grievance Mechanism, along with the grievance form (as included in this SEP) will be made widely available to the public, via the online and offline communication channels. Grievances can be raised directly with the CLO, in person, via the phone or by email (details specified above).	Throughout pre-construction phase (and all project phases)	Company/CLO
Install and check grievance boxes	Local communities	Grievance boxes will be installed in key locations (including the project site) in the affected communities and will be managed by the CLO, who will ensure grievance forms are widely available, the boxes are regularly emptied and all grievances recorded and resolved according to the grievance mechanism. The locations of the grievance boxes shall be displayed in the project website.	Weekly, throughout pre-construction (and for construction; for the operation phase, frequency to be reassessed)	Company/CLO
Conduct tailored engagement activities	<ul style="list-style-type: none"> ■ Vulnerable groups ■ Affected landowners and users 	For the vulnerable groups identified in the affected communities (women, low-income households, Roma community and other ethnics, elderly, a.o. - see Appendix "social baseline study") and affected landowners, the CLO	Throughout pre-construction, (and all project phases)	CLO

Engagement Activity	Target stakeholder group(s)	Description	Timing / Frequency	Responsibility
		will verify if special engagement measures are needed to enable their informed participation in the decision-making process and take appropriate actions. Land-related comments and grievances may require additional engagement by the CLO, so to ensure transparency and effective management of these impacts.		
Construction phase (to be detailed in updated SEP)				
Posting notice boards in the project office and in public places of the affected settlements, in local language.	Local communities	The CLO will be responsible for dissemination of key announcements on Project activities (e.g. incoming transport of big Project equipment within week XX) to the local communities).	Upon major construction activities	CLO
Information of local government about detailed plans and time schedules for construction	Local governments/authorities before the construction of wind farm and each associated facility starts.	Communication of planned activities before the construction starts, including all infrastructures	Notification of start of work prior to start of construction works of wind farm and of each associated facility.	CLO
Regular meetings with the affected communities	Local communities	The CLO will actively listen, collect and process grievances and share relevant Project information.	<ul style="list-style-type: none"> ■ Bi-monthly during construction ■ Additional immediate meetings if necessary (for instance for vulnerable groups, or if a specific concern arises) 	CLO

Engagement Activity	Target stakeholder group(s)	Description	Timing / Frequency	Responsibility
Distribution and Broadcasting of Emergency Response Plan issues relevant for general public (and workers).	<ul style="list-style-type: none"> ■ General public ■ Workers 	Presentations of emergency response plan via online and offline communication channels.	<ul style="list-style-type: none"> ■ At site mobilization and during construction phase. 	Contractor
Assessment stakeholder satisfaction with engagement process	<ul style="list-style-type: none"> ■ General public ■ Workers 	Survey if all grievances have been addressed, Survey if stakeholders feel sufficiently informed throughout the planning and construction process	Survey	Communities: CLO Workers: Contractor
Update Stakeholder Engagement Plan (SEP)	<ul style="list-style-type: none"> ■ Operator / O&M Contractor 	Clarify and list all communication and stakeholder engagement tasks to be carried out during operation	<ul style="list-style-type: none"> ■ End of construction phase / Commissioning and takeover. 	CLO
Operations phase (to be detailed in updated SEP)				
Inform on start of operation	Mayors of affected settlements and community members	Inform stakeholders of the start of operation, any health and safety risks for the communities and mitigation measures	2 weeks prior to start of operation	Company
Ongoing information on the annual environmental and social performance of the project (including environmental monitoring) and planned maintenance works	Mayors of affected settlements and community members	<p>Inform stakeholders of the project annual environmental and social performance (including bird and bat monitoring) by publishing summary report on the Company website</p> <p>Inform stakeholders of the project annual maintenance works (duration, amount of people)</p>	Annual	Company / Operator / O&M Contractor (TBD)
Continue disclosure of Grievance Mechanism	All stakeholders, especially local communities	Periodically collect local complaints, update grievance	Continuously during operation phase	Company / Operator / O&M Contractor (TBD)

Engagement Activity	Target stakeholder group(s)	Description	Timing / Frequency	Responsibility
		logbook and follow-up grievances.		
Continue disclosure of emergency response plan during operation	Operator / O&M Contractor staff	Periodically update emergency response plan and conduct trainings for staff.	Continuously during operation phase	Company / Operator / O&M Contractor (TBD)
Decommissioning (to be detailed in updated SEP)				
Inform on schedule and approach for decommissioning	<ul style="list-style-type: none"> ■ Mayors of affected settlements and community members 	Inform stakeholders on the upcoming decommissioning phase, any health and safety risks for the communities and mitigation measures.	Start discussions since the previous quarter to the one when decommissioning activities will start	Company / Operator / Decommissioning contractor

7. ENGAGEMENT TOOLS

The consistent use of best practice tools that have been tailored to local context and stakeholders needs maximize the effectiveness of the engagement action plan.

The tools outlined in Table 7-1 will be used across the different stages of the Project, benefitting from updates of the contents and messages as the Project progresses; these will be formulated as updates to this current SEP and be subject to management approval prior to dissemination.

Table 7-1 Stakeholder Engagement Tools

Tool	Description
Company website	<p>The Company website will provide relevant and up to date information regarding construction works and operational aspects.</p> <p>The Project NTS and SEP, prepared as part of the environmental and social review package will be translated into Serbian and made accessible, online and offline, to all interested stakeholders. Alongside these documents, the External Grievance Form will be made available to the public. Supporting environmental and social studies will be made available in Serbian, where available, and in English version (translation can be arranged upon request).</p>
Notice Boards	<p>Notice boards will be erected at the entrance to the construction worksites and at other agreed locations in the area impacted by the Project, accessible to the communities, and updated appropriately. Project information should be available in local language.</p> <p>The notice board will serve as an information dissemination tool. For example, the Project team will be able to display contact details and grievance mechanism, connection updates and work schedule, accessibility, and recruitment updates. Wherever possible, maps or visual aids will be employed to increase accessibility of the notices.</p>
Regular Internal Reporting	<p>The CLO will prepare regular reports to the Management team. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or non-compliances to the requirements of this SEP, planned activities for the next reporting period and any other issues of potential concern – please see section 10 for more details.</p>
Reporting to Stakeholders	<p>The CLO and other relevant Project team members will provide Project updates to different stakeholder groups at agreed timelines and following engagements conducted.</p>

8. RESOURCES AND RESPONSIBILITIES

The overall responsibility for the effective engagement of the project stakeholders, as outlined in this SEP, lies with the Project Company.

The Project has a Community Liaison Officer (CLO) appointed since 2012 to oversee community and stakeholder engagement activities for the Project. The CLO is well acquainted with the local context and stakeholders' specific needs and also with the stakeholder engagement process as outlined in the SEP.

Working in close collaboration with the Project team, the CLO will have a clear understanding of the Project schedule and engagement milestones and engage stakeholders appropriately in line with the Project progress.

Moreover, the CLO will be responsible for interfacing between the stakeholders and the Project and managing the grievance mechanism.

CLO specific responsibilities

The specific responsibilities of the CLO are:

- act as liaison between the community/stakeholders and the Company; maintains regular presence in the affected communities and engagement with community members to monitor opinions, provide updates on Project activities and ensure communication with community members and vulnerable groups;
- lead day-to-day implementation of the SEP and Grievance Mechanism and manages the grievance resolution process; plans the stakeholder engagement activities and ensures they are appropriately implemented by Company and contracted staff;
- is responsible for ensuring grievance mechanism dissemination and training, communication, monitoring and reporting; is responsible for verifying contractors' compliance to grievance management commitments;
- takes an active role in the identification of community needs and assists in the successful development and implementation of a Community Investment Plan for the Project;
- produce stakeholder engagement monitoring reports and updates the SEP accordingly.

The dedicated CLO for the Project is Mrs. Ljiljana Nikolic:

- Telephone: +381 (0) 13 210 00 02
- Email: ljiljana.nikolic@wvserbia.com
- Address: Alibunar Windfarm Office, Žarka Zrenjanina 10, 26310 Alibunar, Serbia

The contact details of the CLO will be made available to the contractors, local communities and residents of the area in order to ensure that any grievances including related to environmental, social and H&S aspects of the wind farm can be easily communicated to the Company.

9. GRIEVANCE MECHANISM

9.1 Purpose and Principles

The IFC's Good Practice Guide to address grievances from project-affected communities describes a grievance as:

"A concern or complaint raised by an individual or a group within communities affected by company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations, and may be filed in the same manner and handled with the same procedure".

It describes a project-level grievance mechanism for affected communities as:

"A process for receiving, evaluating, and addressing project-related grievances from affected communities at the level of the company, or project" (IFC, 2009).

The Grievance Mechanism (GM) should be broadly and regularly publicized, especially during the planning and construction phases to ensure that comments, questions and grievances are appropriately channelled and registered. "Combined with effective community engagement, a transparent and legitimate grievance mechanism that is a joint effort between the company and communities can increase trust and improve communication" (IFC, 2009)⁴.

The Grievance Mechanism enables any stakeholder to make a grievance about the way the Project is being designed or implemented. Grievances may take the form of specific complaints for damages/injury, concerns about routine Project activities, or perceived incidents or impacts.

For the Project-affected communities, an effective grievance mechanism provides an accessible, yet formalised (identification, tracking and resolving of grievances) alternative to an external dispute resolution process. However, a stakeholder will always have the right to complain to the relevant authorities or the legal system, in accordance with the existing legislation in Serbia.

The grievance mechanism is tailored to the local context of the Project environment and has the aim of finding mutually beneficial solutions to settle issues and developing a trust-based Company-community relationship. The Company commits to process any grievance received in a timely manner, via a procedure that is transparent, culturally appropriate, at no cost, and without retribution for the party presenting the grievance.

9.2 Detailed Grievance Mechanism

Specific grievance procedures will be in line with the IFC Guidance Notes on Grievance Management and will be structured around the following common elements listed below (also see Figure 9-1 below):

- receive the grievance regardless whether it was received verbally or in writing using the Grievance Form and register it in the Grievance Log/Database. The grievance will be recorded in the Grievance Log/Database. A sample grievance form and database are provided in Appendix B to this SEP;
- formally acknowledge the receipt of the grievance to the complainant, in written form (within 7 days of receiving the grievance); if the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step;

⁴ Source: <https://www.ifc.org/wps/wcm/connect/f9019c05-0651-4ff5-9496-c46b66dbee6b/IFC%2BGrievance%2BMechanisms.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-f9019c05-0651-4ff5-9496-c46b66dbee6b-jkD0-g>

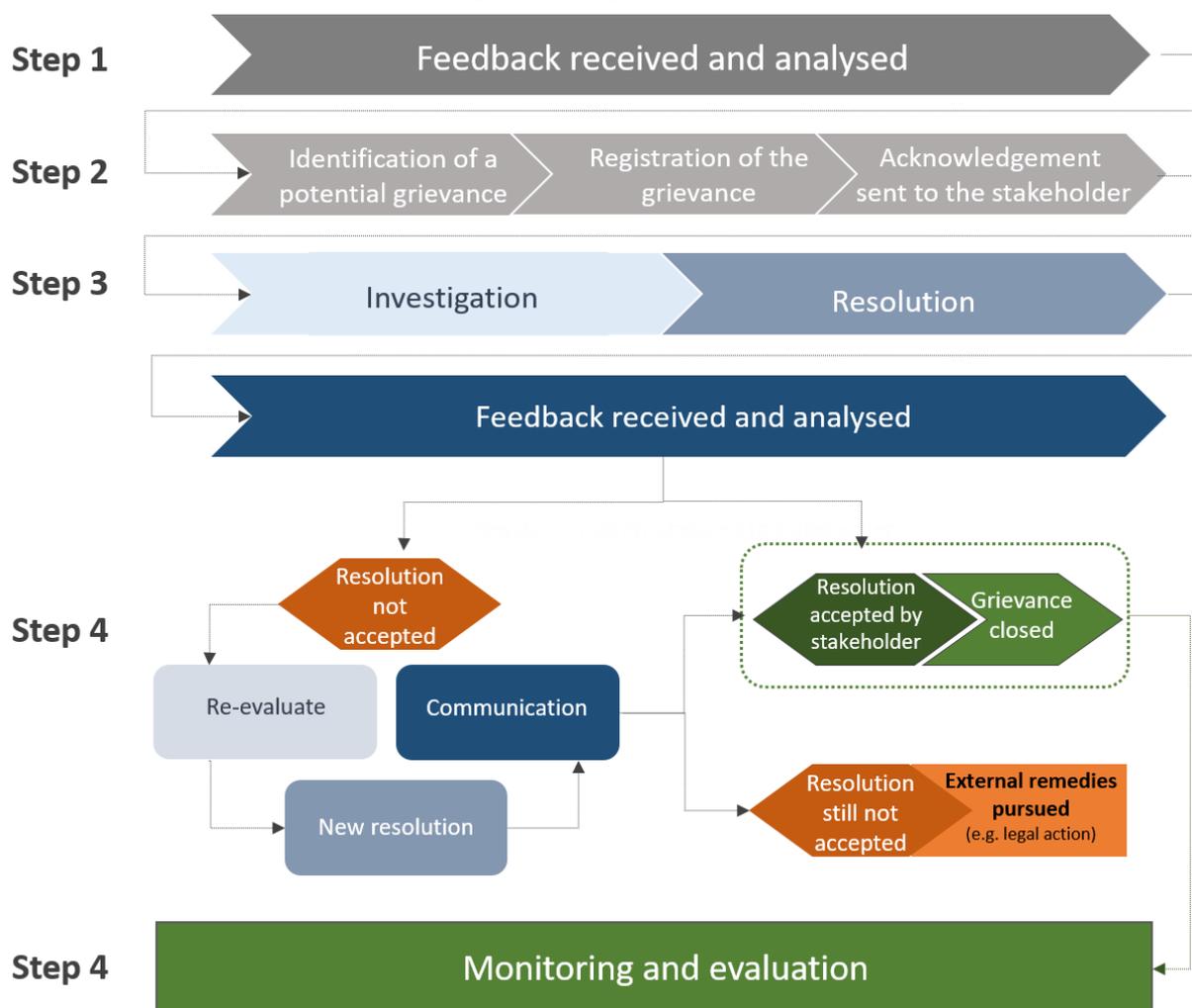
- assess priority and assign responsibility for resolution: significant concerns and incidents will be immediately brought to the attention of senior management;
- review and investigate the issue;
- respond to the complainant;
- follow up with the complainant and close out;
- monitor and evaluate in line with the provisions of Section 10.

It is good practice for a company to publicly commit to a certain time frame in which all recorded complaints will be responded to (be it 48 hours, one week or 30 days) and to ensure this response time is enforced.

Acknowledgement of issue brought forward to be provided within a working day, answer - depending on the issue brought forward.

Should the issue raised be complex and needing further investigation, the complainant will be notified of the time necessary to respond.

Figure 9-1 Grievance mechanism for pre-construction, construction and operation phases



Source: ERM, 2022

10. MONITORING, EVALUATION AND REPORTING

10.1 Overview

In order to assess the effectiveness of this SEP and associated stakeholder engagement activities, the Project will implement a data management and monitoring process, as outlined in this section. This process will further support reporting to project stakeholders, as an integral step in building trust locally and generating shared value.

10.2 Monitoring and Evaluation

Stakeholder engagement activities will be documented and filed in order to ensure accountable delivery of commitments made to stakeholders.

The following documentation will be used and maintained by the Company during the project:

- *Commitments register*: used to keep track of the commitments made to various stakeholders.
- *Meeting minute template*: used to collect meeting minutes; to be filed within the stakeholder database and SEP updates.
- *Stakeholder list*: ongoing updates to the list, including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified.
- *Grievance log* will record all grievances received, management actions taken and whether it has been closed out satisfactorily.
- *Media monitoring* of press and radio stories relevant to the Project.

Records will be reviewed on a quarterly basis to ensure that records are being used and maintained. Commitments and actions recorded during community interaction activities will also be regularly reviewed to ensure they are taken forward.

10.3 Reporting to Stakeholders

10.3.1 Internal Reporting

The following internal reports will be developed:

- *Red Flag Reports*: weekly or daily reports for urgent items (e.g. critical concerns or grievances) or incidents of significant nature. The Grievance Mechanism will set the level of incident to be communicated in the red flag reports together with reporting time requirements.
- *Quarterly Progress reports*: internal quarterly progress reports will be prepared by the CLO. These reports will review:
 - dialogue activities undertaken thus far: stakeholders met, key topics discussed, main concerns and expectations, positioning towards project/ activity activities;
 - grievance mechanism: participation, main grievances reported, progress summary (actions to be taken and status);
 - risks to the Project;
 - limitations (e.g. resources, internal alignment);
 - priorities for next quarter.

These reports will be discussed at quarterly internal meetings and will be circulated internally as required, including to the relevant company Contractors.

10.3.2 External Reporting

Once consultation with stakeholders has taken place, stakeholders generally want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, impacts are being monitored.

The Company will keep track of commitments made (commitments tracker) and communicate progress made against these commitments on a regular basis (for instance, during regular meetings with the community representatives).

A Stakeholder Engagement Progress Report will be prepared by the Project, summarizing SEP results, based on which updated information will be delivered back to the community.

APPENDIX A SAMPLE GRIEVANCE FORM

Grievance Form

Reference No:	
Full Name (Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent)	First name _____ Last name _____ <input type="checkbox"/> I wish to rise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information (optional)	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Telephone: _____
	<input type="checkbox"/> 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?	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Preferred language of communication	<input type="checkbox"/> Serbian/ <input type="checkbox"/> Romanian/ <input type="checkbox"/> English/ Other, please specify ____
Please return form to: Alibunar 1 & Alibunar 2 Windfarm, Žarka Zrenjanina 10, 26310, Alibunar, Serbia	Or to: Phone: +381 (0) 13 210 00 02 E-mail: ljljana.nikolic@wvserbia.rs Mobile: +381 (0) 69 210 00 02 Contact person: Ljljana Nikolić

Formular za ulaganje žalbe

Broj:	
Puno ime (Napomena: možete ostati anonimni ako želite ili zatražite da se Vaš identitet ne otkriva bez Vašeg pristanka)	Ime _____ Prezime _____ <input type="checkbox"/> Želim da podnesem anonimno svoju žalbu <input type="checkbox"/> Zahtevam da se moj identitet ne otkriva bez mog pristanka
Kontakt podaci (opciono) Molimo označite kako želite da budete kontaktirani (email, telefon, pošta)	<input type="checkbox"/> Poštom: Molimo navedite poštansku adresu: _____ _____ <input type="checkbox"/> Telefonom: _____ <input type="checkbox"/> Email _____
Opis događaja ili razlog žalbe:	
	Šta se dogodilo? Gde se dogodilo? Kome se dogodilo? Šta je posledica problema?
Datum događaja / ulaganja žalbe	
	<input type="checkbox"/> Događaj se jednom desio (datum _____) <input type="checkbox"/> Događaj se desio više od jednom (koliko puta? _____) <input type="checkbox"/> Traje (problem je aktuelan)
Šta bi želeli da se desi u cilju rešavanja problema?	
Željeni jezik komunikacije	<input type="checkbox"/> srpski <input type="checkbox"/> rumunski <input type="checkbox"/> engleski <input type="checkbox"/> drugo _____
Molimo Vas da pošaljete formular na: Alibunar 1 & Alibunar 2 Windfarm, Žarka Zrenjanina 10, 26310, Alibunar, Srbija	Ili na: Telefon: +381 (0) 13 210 00 02 Email: ljljana.nikolic@wvserbia.rs Mobilni: +381 (0) 69 210 00 02 Kontakt osoba: Ljiljana Nikolić