



ENVIRONMENTAL & SOCIAL ACTION PLAN

DNISTROVSKIY 100 MW WIND POWER PROJECT

UKRAINE

May 2019

Document History

Version	Purpose description	Originated by	Date
1.0	Initial draft	Ukraine Power Resources	September 2018
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This Environmental and Social Action Plan has been compiled by Ukraine Power Resources, LLC (“UPR”) on behalf of Dnistrovska Vitroelektronstantsiia LLC (“Project Company”) in connection with the proposed 100 MW Dnistrovskiy wind power project (“Project” or “Wind Farm”), located about 40 km north of the Black Sea coast in the Odessa region of Ukraine. UPR is planning to construct and operate the Project which includes twenty-six (26) wind turbines, about 13 km of new or improved access and site roads, an on-site substation, 15 km underground cables to convey electricity from the turbines to the substation, and a 2.7 km 110 kV underground transmission line to convey electricity from the Project substation to the regional grid. Project financing may be provided by the European Bank for Reconstruction and Development and possibly the International Finance Corporation (“IFC”) (collectively, the “Lenders”).

UPR will need to implement a number of actions to ensure and verify that the Project is constructed and operated in compliance with law, IFC Performance Standards, EBRD Performance Requirements, and Good International Industry Practice (“GIIP”). This Environmental and Social Action Plan (“ESAP”) defines those actions. In general, the ESAP requires compliance with the Environmental and Social Management System (“ESMS”) that is being developed for the Project, and includes specific requirements for many of the actions whose purpose is to avoid, reduce, or otherwise mitigate the most significant potential impacts.

The table below constitutes the ESAP. It identifies the required actions, the basis of the requirement, the timing of the action, the criteria to be used for determining whether the required action has been successfully achieved, and information that will be reported to the Lenders. Implementation of the actions is the responsibility of UPR. When contractors perform work under contract to UPR or their designee(s), UPR will be responsible for those contractors’ compliance with the requirements of the ESAP. This is expected to be accomplished by inclusion of requirements in contracts and subcontracts, and by direct oversight and supervision by UPR and/or its designee, as needed.

Performance of the actions required by this ESAP will be reported to the Lenders by UPR as required by the ESAP and the financing agreements. The ESAP will be audited or otherwise evaluated by the Lenders throughout construction and operation of the Project.

This ESAP may be revised from time to time during Project implementation, sometimes in response to evaluations conducted under the ESAP itself. No changes will be made if they could allow violations of Ukrainian law or of Lenders’ requirements for environmental and social performance.

The following EBRD Performance Requirements and IFC Performance Standards are not included in the scope of this ESAP as it was determined that are not applicable for the Project:

- EBRD PR7: Indigenous People
- EBRD PR9: Financial Intermediaries
- IFC PS7: Indigenous People

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs and Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*	Status / Notes
PR1 Assessment and Management of Environmental and Social Impacts and Issues							
1.1	Prepare and submit environmental and social monitoring reports that show status of compliance with EBRD PRs, IFC PSs, and with the requirements of this ESAP.	Compliance with EBRD PRs and IFC PSs.	EBRD PR1 IFC PS1	UPR / Dnistr Wind.	Every six months during construction, annually thereafter	KPI: submission of report in mutually agreed format	
1.2	Develop an organizational structure of the UPR Project Management Team, with all key roles represented in an organogram. Appoint person(s) to be responsible for environmental, social, and occupational health and safety for the project.	Optimisation of EHSS management through a formalised and documented system.	EBRD PR1 IFC PS1 GIIP	UPR / Dnistr Wind.	<ul style="list-style-type: none"> Appoint: Within 90 days of financial close, but prior to construction 	<ul style="list-style-type: none"> Organogram designed Responsible person(s) appointed/hired and on staff <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> Status of appointments, including CVs of appointed professionals 	
1.3	Develop and implement an integrated management system for environmental and social performance and for occupational health and safety. Relevant requirements to be cascaded to contractors. <i>[Note: system(s) should generally meet objectives of ISO14001 and OHSAS 18001, but need not be certified]</i> Develop an Environmental and Social Management System (ESMS) and social management plan ("CESMP"). Relevant requirements to be cascaded to contractors.	Optimisation of EHSS management through a formalised and documented system.	EBRD PR1 IFC PS1 GIIP	UPR / Dnistr Wind and / or external consultants (expertise as required) and third party contractor with EHSS performance monitoring.	<ul style="list-style-type: none"> Develop systems prior to construction. Implementation during construction Develop ESMS prior to financial close. Implement throughout construction and operation Develop CESMP prior to construction. Implement throughout construction Develop Contractor/Subcontractor Management Plan prior to executing contracts/subcontracts. Implement throughout execution of contracts/subcontracts 	<ul style="list-style-type: none"> Development and implementation of the ESHS management system throughout the project. ESMS developed and in place - Construction and operation in compliance with ESMS Development, adoption, and implementation of contractor management system <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> Report to Lenders on status of systems and plans development and implementation Report ESHS training(s) of contractors/subcontractors and contractor oversight 	

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	Develop and implement Contractor/Subcontractor Management Plan.						
1.4	Undertake activities that require permits, SPZ approvals and any consents/authorizations with valid documentation in place.	Compliance with the Ukrainian regulatory requirements.	Ukrainian law EBRD PR1 IFC PS1	UPR / Dnistr Wind and / or external consultants (expertise as required).	Prior to undertaking any activity that requires permit or authorization	<ul style="list-style-type: none"> Permits/authorizations received <i>ESHS reporting</i> <ul style="list-style-type: none"> Report on status of permits/authorizations Report immediately any citations or fines for noncompliance, and other instances of material noncompliance 	
1.5	Implement national EIA and the “Conclusion” mitigation measures and verify current plans do not change validity of national EIA and the “Conclusion”	Compliance with the Ukrainian regulatory requirements	Ukrainian regulation	UPR / Dnistr Wind	During all stages of the project Verify if locations change	<ul style="list-style-type: none"> Correspondence of confirmation from regulator 	
PR2 Labour and Working Conditions							
2.1	UPR and their contractors to develop/maintain written human resources policies and procedures in official language(s). Develop and implement a grievance procedure for all workers, including contractor employees and include in formal HR policy.	Contractor HR policies in accordance with PR2 and PS2 Capture and resolution of internal grievances	EBRD PR2 IFC PS2 GIIP	UPR / Dnistr Wind and contractors	Within 3 months of commitment of funds or prior to construction (whichever is first). Dissemination of information to workers at time of hiring or first work	<ul style="list-style-type: none"> HR policy and procedures developed in accordance with PR2 and PS2, in place and available to direct workers and contractor employees Contractors’ policies and procedures inspected and approved by Lenders or third party acceptable to Lenders Adoption and implementation of employee grievance procedure <i>ESHS reporting:</i> <ul style="list-style-type: none"> Report status of HR policies and procedures 	

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						<ul style="list-style-type: none"> Provide summary of makeup of workforce by skill level, age, gender, geographic origin, and other key variables Report to Lenders summary of grievances and resolutions 	
2.2	Develop and implement occupational health and safety plan(s) and cascade to contractors.	To minimise accidents and incidents and ensure safety of workers and equipment	Ukrainian law EBRD PR2 IFC PS2 GIIP	UPR / Dnistr Wind and contractors	Plans in place prior to undertaking on-site activities that would be subject to requirement	<ul style="list-style-type: none"> OHS plans developed, reviewed/approved, and in place Safe workplace, minimal incidents and lost time <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> Provide evidence of review and approval of OHS plan(s) for all project contractors and subcontractors by qualified professional Report on OHS issues, including work hours, incident statistics, and status of training (to cover entire site workforce) Report immediately (within 48 h) in case of major accidents and/or fatalities 	
2.3	Prepare a Construction Camp Management Plan, an Influx Management Plan (if required), Health and Security Management Plan and an Employment Management Plan. Construction Camp Management Plan should ensure adequate accommodation and amenities (including medical provision) and	Compliance with EBRD and IFC worker accommodation guidance	EBRD PR1 and PR4. EBRD PR2; and Guidance Note by IFC / EBRD "Workers' Accommodation: Processes and Standards"	UPR / Dnistr Wind and / or construction companies.	Prior to construction To be incorporated into tender documents	Develop and implement plans Technical statement to the contract documentation.	

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	include gender segregated facilities as required Plan(s) to include a code of conduct to be adopted to govern life in the Construction Camp.						
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Maintain equipment and take measures to keep noise to a minimum, including avoiding/minimizing use of equipment at night. Monitor for noise at receptor locations upon request by affected people. Implement appropriate mitigation if noise exceeds applicable standards.	Prevention of adverse impacts associated with noise and vibration	EBRD PR3 IFC PS3 GIIP UPR EHS guidelines	UPR / Dnistr Wind.	<ul style="list-style-type: none"> Construction noise controls: throughout construction On-demand monitoring: upon receipt of complaint or request during construction and operation 	<ul style="list-style-type: none"> Minimal noise disturbance <i>ESHS reporting:</i> <ul style="list-style-type: none"> Report summary of noise complaints and actions taken 	
3.2	Develop and implement construction phase dust suppression plan to ensure dusty loads are sheeted and unsealed roads are damped-down including for the concrete batch plant	Prevention of adverse air quality impacts	Ukrainian law EBRD PR3 EU IED1 IFC PS3	UPR / Dnistr Wind and / or construction companies.	<ul style="list-style-type: none"> Develop: prior to construction Implement: throughout construction when suppression is needed 	<ul style="list-style-type: none"> Emissions managed and in compliance <i>ESHS reporting:</i> <ul style="list-style-type: none"> Report compliance status 	
3.3	Develop and implement waste and hazardous materials management plans.	Promote waste management in accordance with the waste hierarchy and the proximity principle	Ukrainian law EBRD PR3 IFC PS3	UPR / Dnistr Wind and / or construction companies.	<ul style="list-style-type: none"> Plan(s): prior to generation of wastes and management of hazardous materials Implementation: throughout construction and operation 	<ul style="list-style-type: none"> Identification of wastes and hazardous materials, development of plan(s) All wastes and materials managed according to plan <i>ESHS reporting:</i> <ul style="list-style-type: none"> Report on status of plan development and approval by authorities (if required) Report immediately any major releases or incidents 	

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3.4	Develop earthen material management plan.	Promote earthen material management	Ukrainian law EBRD PR3 IFC PS3 GIIP	UPR / Dnistr Wind and / or construction companies.	<ul style="list-style-type: none"> Plan: Prior to ground-disturbing activities Erosion control per plan: throughout construction 	<ul style="list-style-type: none"> Adoption of plan, implementation of best practices, protection of topsoil and stored rock Minimal erosion and loss of topsoil <i>ESHS reporting:</i> <ul style="list-style-type: none"> Report to Lenders on plan status and highlights of erosion control program. 	
3.5	Develop water management plan.	Reduction of water use and wastewater generation	EBRD PR3 IFC PS3	UPR / Dnistr Wind and / or construction companies.	<ul style="list-style-type: none"> Plan developed; prior to initial use of water from Udobne or other systems Plan implementation and monitoring: throughout period of water use 	<ul style="list-style-type: none"> Sufficient and sustainable water supply No adverse effects on Udobne or other water systems/aquifers <i>ESHS reporting:</i> <ul style="list-style-type: none"> Status of water management plan Limitations on source sustainability, if any, and highlights of contingency plans Actions taken in case changes in water supplies or usage are needed 	
3.6	Develop a Decommissioning and Restoration Plan	Waste minimisation and reduction in incidents / accidents	EBRD PR3 IFC PS3	UPR / Dnistr Wind and / or construction companies.	<ul style="list-style-type: none"> Plan developed prior to decommissioning Plan implemented during decommissioning 	<ul style="list-style-type: none"> Plan made available, and implemented 	
PR4	Health and Safety						
4.1	Develop and implement plans and procedures to protect public health, safety and security inclusive of a Traffic management plan and	To minimise accidents and incidents and ensure safety of workers and community	Ukrainian law EBRD PR4 IFC PS4	UPR / Dnistr Wind and / or construction companies and transportation companies.	<ul style="list-style-type: none"> Develop plans and procedures before construction. Plans and procedures to be kept up to date and relevant throughout the project lifecycle. 	<ul style="list-style-type: none"> Plans and procedures developed, made available, and implemented No firearms by security personnel 	

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	Emergency preparedness and response plan.					<ul style="list-style-type: none"> Traffic Management Plan developed in consultation with local authorities and traffic managed in line with plan <p><i>ESHS reporting</i></p> <ul style="list-style-type: none"> Report on status of plans and procedures adoption Report summary of incidents involving members of the public including trespassers Report to Lenders immediately if determined that armed guards are necessary – report before providing arms Report summary of training and of traffic incidents 	
4.2	Undertake a time modelling simulation for shadow flicker. Investigate reports/complaints of shadow flicker and, if needed, develop mitigation to prevent shadow flicker. In addition, community engagement should be undertaken to ensure that communities are aware of the grievance mechanism process available.	To ensure safety of workers and community	EBRD PR4 IFC PS4	UPR / Dnistr Wind.	<ul style="list-style-type: none"> Investigate: upon receipt of complaint Mitigation (turbine shutdown at certain hours of certain days in certain weather conditions): if needed Compensation: if needed and agreed by affected people 	<ul style="list-style-type: none"> No shadow flicker disturbance, or appropriate mitigation/ compensation in place <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> Report shadow flicker complaints and actions taken 	
4.5	Encourage contractors to hire local workers. Develop training program to upgrade skills of unskilled local workers. Consider funding for local students' university education in science	Good employment practices and upgrading skills in local community	EBRD PR2,4 IFC PS2,4 GIIP	UPR / Dnistr Wind and / or construction companies.	<ul style="list-style-type: none"> Establish goals: prior to engaging contractors Commission training program: by financial close 	<ul style="list-style-type: none"> Meaningful local hiring, including semi-skilled and skilled workers Training for local workers Educational support provided <p><i>ESHS reporting:</i></p>	

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	and/or engineering disciplines (e.g., ornithology).					<ul style="list-style-type: none"> Report numbers of local vs non-local vs expatriate workers, and skill levels Report results of social investment program, including for training, education, and other investments that can benefit the project as well as social welfare 	
PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement							
5.1	Should it become apparent that involuntary resettlement be required during the project and for any future expansion of the project, a Land Acquisition Plan should be developed along with a census and socio-economic survey to determine the project-affected persons (PAPs) and households including any affected vulnerable groups.	Minimise impacts of land acquisition.	Ukrainian law EBRD PR5	UPR / Dnistr Wind	As soon as possible.	<ul style="list-style-type: none"> Socio economic data is available determining PAPs, households and vulnerable groups. 	
5.2	Replacement or compensation at replacement value should continue to be provided to any person who suffers economic losses caused by loss of use of land (whether use was authorized or not), damage to crops, injury or death to animals, loss of access to fields, etc.	Minimise impacts of land acquisition.	Ukrainian law EBRD PR5	UPR / Dnistr Wind	Replace/compensate as soon as possible after damages or losses	<ul style="list-style-type: none"> No economic losses by any affected person ESHS reporting: Report summary of damages/losses and status of replacement/ compensation	
PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1	Appoint qualified professional(s) with expertise in ornithology and chiropterology to ensure methodology for bird and bat	Identify, conserve and protect habitats, biodiversity and	Ukrainian law EBRD PR6 IFC PS6	Qualified ornithologist	<ul style="list-style-type: none"> Appointment of experts: prior to financial close Approve methodologies: within 30 day of close 	<ul style="list-style-type: none"> Experts appointed ESHS reporting: <ul style="list-style-type: none"> Report status of appointment 	

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	<p>monitoring is in accordance with Eurobats and Scottish National Heritage guidance, to the extent required or advisable. Implement the modified monitoring program for three years under the oversight of independent expert(s).</p> <p>Produce updated detailed scope of works for additional bird and bat survey work required to ensure full compliance with the above guidance.</p>	living natural resources.			<ul style="list-style-type: none"> Monitoring program implemented: over any 12-month period prior to commissioning Monitoring results: initial report prior to commissioning, subsequent reports annually. Produce updated detailed scope to allow surveys to commence in summer/autumn 2019 	<ul style="list-style-type: none"> <i>Provide revised methodology</i> <i>Provide summary of survey results</i> 	
6.2	<p>Appoint independent expert(s) to conduct annual evaluation of bird and bat seasonal monitoring (item 6.1) and results in order to:</p> <ul style="list-style-type: none"> Assess adequacy of previous characterization(s) of bird/bat use, residence, and passage, including to address the gaps identified within the existing baseline information Re-evaluate impacts on birds and bats based on updated action 6.1. Recommend changes to operating parameters (such as rotation speed or operating hours during sensitive periods/hours) and/or other mitigation Consider cumulative impact on birds and bats and recommend additional mitigation, if required. 	Identify, conserve and protect habitats, biodiversity and living natural resources.	EBRD PR6 IFC PS6	Qualified ornithologist	<ul style="list-style-type: none"> Appoint: prior to year 1 of operation Recommendations for mitigation, possibly including radar: annually for three years 	<ul style="list-style-type: none"> Expert(s) appointed Update baseline Update assessments and recommendations made and adopted <p>ESHS reporting:</p> <ul style="list-style-type: none"> Report status of appointment, including CV(s) of expert(s) Provide summary of assessments including cumulative, evaluations, and recommendations Report on modifications to mitigation and/or monitoring programs 	

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6.3	<p>Design and implement methodology to measure bird and bat mortality due to collision with turbines and blades, and with transmission line. If excessive mortality is experienced, based on opinion of qualified experts, recommend and adopt additional mitigation measures. Continue monitoring until experts determine risk is adequately understood and acceptable, but for at least three years.</p> <p>Clarify/update the bird/bat mortality monitoring strategy and gain approval prior to implementation.</p>	Identify, conserve and protect habitats, biodiversity and living natural resources.	Ukrainian law EBRD PR6 IFC PS6	Qualified ornithologist	<ul style="list-style-type: none"> Produce updated/clarified mortality monitoring strategy prior to commissioning. Implemented: at least three years during operation, until experts recommend cessation 	<ul style="list-style-type: none"> Updated/clarified monitoring strategy to be approved Additional mitigation implemented, if needed <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> <i>Provide summary of survey designs and results</i> <i>Describe any additional mitigation</i> <ul style="list-style-type: none"> Competent professional appointed Surveys completed No adverse effects on protected species <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> <i>Report on status of appointment and surveys, and of any required mitigations</i> 	
6.4	Appoint a qualified ecologist/botanist to conduct surveys of areas to be cleared of vegetation (turbine and OHL pylon locations, new roads, laydown areas, etc.) to identify protected or otherwise valuable plants and/or animals that could be destroyed or adversely affected. If protected or valuable species are identified, consult with authorities to identify mitigation, which could include relocation or seed collection of floral species, adjusting schedule to avoid nesting/breeding by protected fauna, avoidance of specific locations, etc.	Identify, conserve and protect habitats, biodiversity and living natural resources.	Ukrainian law EBRD PR6 IFC PS6	Qualified ecologist	<ul style="list-style-type: none"> Competent professional appointed and surveys conducted: immediately prior to construction at specific sites Mitigation/conservation implemented: as required by authorities to avoid impacts on protected species 		

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6.5	<p>Prepare and implement a landscape management plan for all project activities. Plan is to call for (at a minimum):</p> <ul style="list-style-type: none"> Vegetation screening of substation and buildings Restoration/revegetation of all disturbed ground as soon as construction activities are completed Use of native species for seeding/replanting. Monitoring and repairs until vegetation is self-sustaining for at least three successive years 	Identify, conserve and protect habitats, biodiversity and living natural resources.	EBRD PR4,6 IFC PS4,6	UPR / Dnistr Wind and / or landscape architect	<ul style="list-style-type: none"> Plan: Prior to construction Implementation: throughout construction and operation 	<ul style="list-style-type: none"> Development and implementation of the plan. Agreement of planting areas Clearing of vegetation only where required <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> <i>Report highlights of plan and of implementation</i> 	
6.6	The company will establish and maintain a collaborative relationship with developers of other windfarms in the vicinity of DWPP to understand the potential cumulative impact of these windfarms. The objective will be to share information on bird and bat movement, collision risk, mortality, as well as management actions to mitigate possible cumulative impacts. The conclusions of any collaborative CIA activity will be used to inform and if relevant, revise the project ESMS.	Identify, conserve and protect habitats, biodiversity and living natural resources.	EBRD PR6 IFC PS6 and PS1, GIIP, UPR EHS guidelines	UPR / Dnistr Wind.	<ul style="list-style-type: none"> Information shared: as needed Adaptive management: throughout construction and at least three years of operation 	<ul style="list-style-type: none"> Adaptive management approach implemented based on engagement with other project developers Revision of ESMS as needed to address cumulative impacts; Information shared as requested <p><i>ESHS Reporting:</i></p> <ul style="list-style-type: none"> <i>Report status of other wind projects in area</i> <i>Report on recommended changes to ESMS</i> 	
6.7	A dedicated Biodiversity Management Plan should be produced (either as a standalone document, or as a discrete component of a wider environmental strategy) to collate	Identify, conserve and protect habitats, biodiversity and living natural resources.	EBRD PR6	UPR / Dnistr Wind and / or qualified ecologist	<ul style="list-style-type: none"> Plan approved and adopted prior to construction works. 	<ul style="list-style-type: none"> Plan to be produced and approved by relevant stakeholders and lenders Implementation of plan and annual checking 	

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	<p>and clarify the general biodiversity management measures being proposed. This should include (but is not limited to):</p> <ul style="list-style-type: none"> • Invasive species management • Protection of reptile hibernacula • Animal welfare protection (e.g. documenting action 6.4 in further detail) • Measures to reduce potential collision/barotrauma impacts to bats and birds (e.g. potentially including curtailment) • All bird and bat monitoring measures 					against performance (i.e. through annual audit).	
6.8	Undertake a desk-based evaluation of potential Critical Habitat and Priority Biodiversity Features associated with the project site.	Identify, conserve and protect habitats, biodiversity and living natural resources.	EBRD PR6	UPR / Dnistr Wind and / or qualified ecologist	<ul style="list-style-type: none"> • During disclosure and prior to board consideration 	<ul style="list-style-type: none"> • Brief evaluation report to be approved by EBRD. • And recommendations to be implemented 	
PR8	Cultural Heritage						
8.1	<p>An archaeologist assessment should be undertaken and a plan developed on the protection of archaeological heritage.</p> <p>Competent professional(s) to oversee all excavations and other ground-disturbing activities.</p>	Respecting the local community and the associated traditions and customs	Ukrainian law EBRD PR8 IFC PS8	UPR / Dnistr Wind and / or archaeologist	<ul style="list-style-type: none"> • Visit scheduled for spring time (by archaeologist) • Report to be issued May 2019 • Appointment prior to ground disturbance at designated locations • Oversight at all times during excavations/ ground disturbing activities at locations 	<ul style="list-style-type: none"> • Archeological report findings and Archeological Management Plan (based on report) • If mounds are identified close by once the survey has been completed, locations of the wind turbines should be adjusted. 	

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	Develop and implement chance find procedure, train all relevant staff.				<ul style="list-style-type: none"> Work stopped, conservation undertaken: upon discovery Develop chance find procedure prior to construction. Implement: throughout construction 	<ul style="list-style-type: none"> Competent professional(s) appointed and all excavations overseen by competent professional No removal or loss of cultural heritage without appropriate conservation Chance Find Procedure in place and training provided No cultural heritage removed or lost without appropriate conservation <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> Report status of appointment Report chance finds and actions taken 	
PR10 Information Disclosure and Stakeholder Engagement							
10.1	Implement the Stakeholder Plan (SEP), including the grievance mechanism.	Information dissemination and continuous engagement with affected stakeholders.	EBRD PR10 IFC PS1	UPR / Dnistr Wind.	<ul style="list-style-type: none"> Implement second round: during IFI disclosure periods Implement continuing engagement per SEP: throughout construction and operation 	<ul style="list-style-type: none"> Stakeholders informed and engaged as defined in SEP Grievance mechanism for external stakeholders in place and operational Stakeholders aware of Community Liaison Officer (if appointed) <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> Report to Lenders highlights of stakeholder engagement Report to Lenders summary of grievances and responses 	
10.2	Disclosure of documents that include the LAP, SEP, NTS, ESAP, national EIA and ESIA in	EBRD public information policy	EBRD PR10	UPR / Dnistr Wind.	60 day disclosure period required	<ul style="list-style-type: none"> Disclosure of key documents in the public domain. 	

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	accordance with requirements for EBRD Category A Project.					<ul style="list-style-type: none"> • <i>Document grievances and response to grievances with records maintained.</i> 	