



STAKEHOLDER ENGAGEMENT PLAN & GRIEVANCE MECHANISM

DNISTROVSKIY 100 MW WIND POWER PROJECT

UKRAINE

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Document History

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1. Introduction

Ukraine Power Resources is proposing to develop the 100 MW Dnistrovskiy Wind Power Project (the “Project”) at a site approximately 40 km north of the Black Sea coast in the Odessa region of Ukraine. Effective stakeholder engagement is needed to avoid and minimize the social risks of the proposed Dnistrovskiy wind farm and to ensure that the Project has a long-term community support.

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process for the Project. It outlines a systematic approach to stakeholder engagement that will help UPR develop and maintain over time a constructive relationship with their stakeholders throughout the duration of the Project. The document also includes a grievance mechanism for stakeholders to raise their concerns about the Project.

The SEP has been produced in accordance with the international standards required by the European Bank for Reconstruction and Development (EBRD), and other international financial institutions (IFIs), as the Project might require financing from EBRD and potentially from other international investment banks.

The SEP is a living document and it will be regularly monitored, reviewed and updated by UPR throughout all stages of Project implementation, and as necessary in line with new or changed activities including changes in Project design or newly identified stakeholders.

Stakeholder engagement and consultation aims to inform and improve Project decision-making and build understanding by actively involving individuals, groups and organizations with a stake in the Project. It helps to:

- Identify and involve all potentially affected groups and individuals;
- Generate a good understanding of the Project amongst those that will be affected;
- Identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders;
- Ensure that mitigation measures are appropriate (implementable, effective, and efficient); and
- Establish a system for long-term communications between the Project and communities that is of benefit to all parties.

2. Production Description

2.1. Project Location

The design area of the Dnistrovskiy Wind Farm is located to the north of Bilgorod-Dnistrovskiy. The site elevation is between 70 and 130 meters above sea level. In the East, the project area borders on the Dnister Estuary and Dnister Delta Important Bird Area (IBA), and in the West it borders on agricultural land. The site is crossed by the Odessa-Izmail motorway (E 87) a road of

local importance, which passes practically across the entire site (Fig. 1). The location of the wind farm site is shown in Figure 1, and the proposed layout is shown in Figure 2, below.

The territory of the Project is represented exclusively by agricultural fields separated by artificial wood strips. Dirt roads cross the site, allowing access to the large fields for farming. The landscape surrounding the site is relatively sparsely populated; there are a number of small settlements which range in size and density, including: Udobne, Starokozache, Semenivka and Moloha.



Figure 1 Plan of the project territory placement of the Dnistrovskiy wind power plant



Figure 2 DWPP 100 MW Turbine Layout

2.2. Project Characteristics

The Dnistrovskiy wind farm will comprise up to twenty-six (26) wind turbine generators (“WTGs” or “Turbines”) each with a rated output of between 3.8 and 4.0 MW. It was determined that the total installed electrical generating capacity of the Wind Farm will be 100 MW with the possibility of expanding up to 150 MWs if additional interconnection capacity is provided. UPR has shortlisted three Turbine options for the Project: GE 137-3.8 MW 131 HH, Nordex N131-3.9 MW134 HH and Vestas V136-4.0 MW 112 HH. A final decision on turbine supply is expected by the end of April 2019.

The WTG currently being evaluated for the Project is the GE Wind 3.8 MW turbine on 131-meter towers and with rotor diameter of 137 meters.

The wind farm also includes the following infrastructure:

- Underground foundations approximately 16 meters in diameter with up to 14 piles up to 30 meters deep.
- A rectangular area of gravel next to the foundations measuring approximately 33 x 100 meters to accommodate the crane and turbine components during construction.
- A network of 5-meter-wide access roads that connect all the wind turbines.
- An underground 35 KV electrical cable network (approx. 45 km) which will connect wind turbines to the Project substation.
- A 35/110 kV Project substation with approximately 2.7 of underground high voltage power lines connecting to the Odessa Oblenergo network at the Starokozache substation.

Locations of wind turbines have been selected along existing field roads to minimize the impact of the wind farm infrastructure on present land use.

UPR is consulting with the local authorities as to whether to provide accommodation for work crews locally or at a new construction camp to be located near the center of the project area.

It is planned that construction and installation will commence in Q2 2019 for phase 1 (9 wind turbines installed with a total capacity of 34.5 MW) and completed in Q4 2019 when commissioning will be undertaken. They will start operating in Q1 2020. As part of phase 2 (the remaining 17 wind turbines with a total capacity of 65.1 MW), construction and installation will commence in Q3/4 2019 and completed in Q2 2020 when commissioning will be undertaken. They will start operating in Q3 2020. As part of the project, roads will be developed. The main access roads to the site and the development of access roads to the turbine plots will be undertaken early in the construction phase.

2.3. Need for the Development

The proposed wind farm is needed because, on a national level:

- It will provide a valuable source of renewable energy for use within Ukraine to support infrastructure development and the national renewable energy development goals, including those set forth in:
 - The Decree of the Cabinet of Ministers of Ukraine “On the National Action Plan for Energy Efficiency until 2020” as of November 25, 2015.
 - The Order of the Cabinet of Ministers of Ukraine "On the National Action Plan for Renewable Energy for the Period until 2020" as of October 1, 2014 N902-p.
 - The Order of the Cabinet of Ministers of Ukraine "On programs for increasing energy efficiency and reducing energy consumption" as of 17.12.08. No. 1567-p.
 - Energy Strategy of Ukraine for the period up to 2035: "Security, Energy Efficiency, Competitiveness", approved by the order of the Cabinet of Ministers of Ukraine as of August 18, 2017 No. 605-p; and
 - The Law of Ukraine "On Amendments to Some Laws of Ukraine to Ensure Competitive Conditions for Electricity Production by Alternative Energy Sources" No. 514-VIII from 04.06.2015.
- It will provide the Bilgorod-Dnistrovskiy district with much needed power generation capacity;
- It will strengthen Ukraine’s energy sector by helping to diversify its energy sources; in 2015, the country’s import dependence was 51.6%, which represents a significant risk to the country’s energy security. The issue of reducing import dependence is one of the key priorities of the Energy Strategy of Ukraine for the period up to 2035 “Security, Energy Efficiency, Competitiveness”;
- It will reduce the country’s reliance on fossil fuel combustion, as approximately 36% of its electricity production is from coal-fired thermal and CHP power plants;
- It will improve the safety of the country’s outdated electricity production, as approximately 55% of its electricity production is from Soviet-era nuclear power plants; and

- It will help Ukraine achieve its 2020 targets as established in its EU Association Agreement (11% of total consumption needs to come from renewable energy sources by 2020).

At the regional and local levels, the proposed wind farm is needed because:

- It will provide a much-needed reliable energy supply to the southern Odessa Region of Ukraine;
 - the region's electricity generating capacity consists of just one 32 MW CHP plant which produces electricity only during the heating season. This plant can't meet the consumer demand in a single district of Odessa, let alone the entire region
 - five large solar power stations with a total installed capacity of 218 MW have been built in the Odessa region since 2012, but can only provide electricity during the daytime unless used with storage systems
- Reduce the southern Odessa Region's dependence on external sources of energy; and
 - the majority of the Southern region receives electricity from the South Ukraine Nuclear Power Station
 - Southwestern districts of the Odessa region receive electricity from the Kuchurgan power station operated by the Russian company "Inter RAO UES"
- It will provide local jobs and other economic improvements, especially during the construction phase.

2.4. Summary of Expected Impacts

An environmental and social impact assessment has been carried out for the three phases of the Project: construction, operation and decommissioning. Impacts have been classified as those related to ecology and nature conservation, landscape and visual impacts, traffic and transport, noise, socio-economic impacts, health safety and public nuisance, emissions to ground and water, air emissions, archeology and cultural heritage.

Identified impacts can be managed and mitigated in accordance with best practice. The measures that will be adopted include informing the local population in a timely manner about construction activities and repairing any damages made to local access roads, as well as restoring any disturbed land. The implementation of the Project is requiring some land acquisition which has been and will continue to be implemented through voluntary transactions without the use of compulsory procedures.

A more detailed presentation of all project impacts and foreseen mitigation measures is presented in the Project Environmental and Social Impact Statement (ESIS) and the Environmental and Social Action Plan (ESAP), available in the following locations:

- www.ukrainepowerresources.com – electronic copy
- UPR office in Kiev – hard copies
 - 4th Floor, 17/52 Bogdana Khmel'nitskogo Street, Kyiv, Ukraine 01030
- Local community offices in Udobne, Starokozache, Semenivka and Moloha – hard copies
 - Udobne: Located at 75, Kotzubynskogo St., Udobne, 67731 (Village Council)

- Starokozache: Located at 34, Soborna St., Starokozache, 67730 (United Community Council)
- Semenivka: 2, Molodizhna St., Semenivka, 67750 (Village Council)
- Moloha: 221 “A”, Kyshynivska St., Moloha, 67751 (United Community Council)

3. Regulatory Requirements

3.1. National Requirements

The Constitution of Ukraine (1996) guarantees Ukrainian citizens’ right to participate in public consultation, to have access to environmental information, and to appeal against authority decisions. Notable laws and regulations pertaining to information access are as follows:

- The right of citizens of Ukraine to receive information, as well as disclosure principles, are set out in the Law of Ukraine “On Information” (1992);
- Rules of submitting complaints on social matters are regulated by the Law of Ukraine “On Citizen Right to Appeal” (1996);
- The Law of Ukraine “On Regulating Urban Planning Activity” (2011) states that approval of Master Plans, plans of territorial zoning, and detailed plans of territories by authorities is forbidden without prior public disclosure of information, collection of propositions and public hearings. The Law outlines a procedure for resolving consultations-borne disputes and requires the authorities to disclose the consultations’ evaluation results and explain how these have been considered;
- Procedure for Facilitating Public Review by Executive Authorities (Decree No 976 of the Cabinet of Ministers of Ukraine, 2008) regulates the obligations of authorities for carrying out the Public Review on request of NGOs, other associations, social organizations, trade unions, employers and representatives of local administrative bodies;
- The Law “On Environmental Protection” (1991) defines the roles and procedure as regards the public disclosure of information about the environment and its protection;
- The Law of Ukraine “On Environmental Impact Assessment” (2017) defines public participation in the environmental protection proceedings and OVNS. The Law also gives a right to perform the public environmental review by individual experts and /or NGO’s; and
- Regulation on Public Participation in Decision Making on Environmental Protection Issues (Decree No. 168 of the Ministry of Environmental Protection of Ukraine) defines the public consultation and information disclosure process.

The requirements to inform and take the public interests into account are set out by the State Building Standards of Ukraine DBN A.2.2-1-2003 “Structure and Content of Environment Impact Assessment (OVNS) Prepared for Design and Construction of Enterprises, Buildings, and Structures.” Some provisions of the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters have been incorporated into this DBN following the ratification of the Convention by Ukraine in 1999. According to the DBN, the project proponent is obliged to:

- communicate information about the planned project to the public through the local authorities;
- define the place and procedure of public hearings;
- collect the public comments and suggestions and take them into consideration; and
- publish “Statement of Intent” and “Statement of Environmental Consequences of Activity” in the mass media.

3.2. EBRD Requirements

All Projects funded by the EBRD are required to meet best international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the EBRD Environmental and Social Policy of 2014 and the ten EBRD performance requirements (PRs). The project has been assessed against PRs 1, 2, 3, 4, 5, 6, 8 and 10. The EBRD PR 7 (Indigenous peoples) and PR 9 (Financial Intermediaries) are not applicable, as there are no indigenous peoples within the Project area, and no financial intermediaries are involved. The main PR associated with Stakeholder Consultation and Information Disclosure is PR10 “Information Disclosure and Stakeholder Engagement”. In summary, the EBRD considers stakeholder engagement an ongoing process which involves:

- the client’s public disclosure of appropriate information so as to enable meaningful consultation with stakeholders;
- meaningful consultation with potentially affected parties; and
- a procedure or policy by which people can make comments or complaints.

4. Summary of Previous Stakeholder Engagement Activities

Stakeholder engagement to date has focused on public consultation surrounding planning regulations, negotiations undertaken to purchase land, consultation related to the corporate social responsibility program, engagement with local council and community members of Udobne, Starokozache, Semenivka and Moloha, and public presentations of the Ukrainian Environmental Impact Assessment (“EIA”) (required by Law of Ukraine “On Environment Impact Assessment” No. 2059-VIII).

The EIA was subject to public disclosure and stakeholder consultation process in line with Ukrainian regulatory requirements and EBRD policies. The first EIA Publication Notice was published on 30 May 2018 in the National EIA register on the website of the Ministry of Ecology and 31 May 2018 in the local newspaper Slovo Pridnistrovia and the regional newspaper Chonomorski Novyny. This first notice invited the public to comment on the scope of the EIA report within 20 working days. On this basis, the EIA report was developed and was presented for public review for a period of 35 working days from 9 August to 28 September 2018. The second EIA Publication Notice was published on 9 August 2018 in the National EIA register on the website of the Ministry of Ecology, together with the full EIA report, and the same day the notice was also published in the local newspaper Slovo Pridnistrovia and the regional newspaper Chonomorski Novyny. The EIA report was available for public review and objections or comments could be submitted the legal address of Dnistrovskiy WPP LLC, village councils of Starokozache, Udobne, Semenivka and Moloha, as well at the state district administration in Bilhord-Dnistrovskiy and Ministry of Ecology. The “Conclusion” was obtained

on 25 October 2018, and this sets out the environmental conditions for the activity which UPR/Dnistr Wind has to follow and fully comply with.

The following stakeholders were approached for review and comments:

- Bilgorod-Dnistrovskiy district state administration
- Local Community of Mayaky (which includes Udobne)
- Local Community of Starokozache (which includes Kozatske)
- Local Community of Seminivka
- Local Community of Moloha
- Land owners in fields where the project is developed
- Farmers renting fields in vicinity of the project
- Odessa regional administration
- Ecological NGO Laguna
- Research Scientific Institute of the Biodiversity of terrestrial and aquatic ecosystems of Ukraine
- Azov Sea-Black Sea Ornithological station
- NGO Caritas

Public hearings were held on August 23rd, 2018 in Bilhorod-Dnistrovskiy, Moloha, Semenivka, Kozatske (Starokozache), and Udobne. Oral questions were answered during these hearings. No written complaints or recommendation were registered during the public review period; UPR received the Confirmation of Public Comment from the Ministry of Ecology and Natural Resources of Ukraine (Minecology) on 13 July 2018 stating that no comments or suggestions on the scope of the EIA report were given from the community to the Ministry of Ecology. UPR received confirmation on 25 October that no comments or suggestions on the EIA report itself were given from the community to the Ministry of Ecology as well as approval on the EIA report by the Ministry.

The DWPP National EIS Public Hearing Report 25.10.2018 details all questions raised from the public hearings and throughout the disclosure period (see Appendix B for details of the report in English and Ukrainian). The document also details subsequent responses from UPR, see Appendix B for full details. In summary, common themes were raised by the community as follows, including subsequent responses received:

- Who are the company, where are they from, who is funding the project?
 - UPR provided information on the company, their background and that the project will be privately funded.
- General questions about the project, including number of turbines and construction timelines, and how does the green tariff work?
 - Information was provided in relation to the number of turbines in total, and in relation to the specific areas. UPR discussed construction timelines and the green tariff, including rates and how it is applied.
- How does the company link with Oblenergo, including relating to repairs and supply?
 - UPR explained the links with Oblenergo and the supply and repairs provided will not change, the only difference is that the wind farm will connect to Oblenergo's substation.

- Land acquisition compensatory measures and community benefits to be obtained from the project?
 - o UPR explained the process for land acquisition and also provided information on how the community will benefit from the wind farm investment, including payment of taxes and a voluntary social payout programme.
- What are the disadvantages and/or impacts of the project, including questions around vibration and infrasound?
 - o UPR provided detailed explanations around noise and protection zone distances. The possibility of vibration was ruled out completely and explanations were provided to explain that infrasound is not generated at the level of human perception. Videos were shown to the communities to alleviate concerns.

A potential gap has been highlighted in relation to recommendations and public comments/suggestions received from stakeholders on the national EIA. It is recommended that UPR provide full responses to the items identified as partly addressed or taken into account in part (“DWPP National EIS Public Hearing Report 25.10.2018 eng” report, p3). During the land acquisition process, UPR met with landowners to negotiate contracts. Meetings with all landowners and tenants were held. Any location where a tenant disagreed was immediately excluded from consideration.

Throughout the development of the Project, UPR has maintained a close relationship with the Odesa regional administration, Bilgorod-Dnistrovskiy State district administration and the local communities. This is reflected through the Memorandums of Cooperation and Partnership that were signed in August 2018 between Dnistrovskiy wind farm and, the Odesa regional administration, the Bilgorod-Dnistrovskiy State district administration, Mayaky, Moloha, Semenivka, and Starokozache.

Additional stakeholder meetings were undertaken in March 2019, as part of EBRDs funding requirements. International consultants along with UPR met the following stakeholders and visited relevant project areas in order to undertake environmental and social due diligence reporting:

Meeting at Mayaky Village Council

- Head of Mayaky Village Council

Meeting at Udobne Village Council

- Deputy of Udobne Village Council, landowner

Meeting with Starokozache Village Council

- Head of Starokozache Village Council
- Starosta (village chief)

Meeting with Bilhorod-Dnistrovskiy District State Administration

- Head of Bilhorod-Dnistrovskiy District State Administration
- Deputy Head of Bilhorod-Dnistrovskiy District State Administration
- Editor of district newspaper (raion newspaper “Slovo Pridnestrovia”)

Meeting with Semenivka Village Council

- Head of Semenivka Village Council

Meeting with Archaeologist

Meeting with Moloha Village Council

- Head of Moloha Village Council
- Meeting with Local farmer renting from Landowner

All responses received during these stakeholder meetings were positive.

5. Stakeholder Identification and Analysis

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project.

UPR has identified stakeholder groups that may be affected by and/or interested in the implementation of the Project, as well as proposed communication methods and media for each group, presented in Table 1.

As discussed in Section 4, UPR has maintained a close relationship with local communities and engages regularly with local people and administration as part of the Corporate and Social Responsibility (CSR) program to identify stakeholder needs and concerns.

Stakeholder Group	Key expectations	Key concerns	Stakeholder Impact (Low =1 to High =5)	Stakeholder influence (Low =1 to High =5)	Recommendation
External Stakeholders					
People residing (or using land) and owners of businesses operating in Project affected areas where land has been or will be acquired, as well as areas expected to be impacted by transportation. This includes areas of local communities Udobne, Starokozache, Semenivka, and Moloha.	Compensation for any losses; Stable payment of rent/servitude fees	Inadequate compensation; Lifestyle changes	5	3	Continue with stakeholder consultation and dialogue in order to identify land issues
Users of private and public land that will be disturbed during the transport and installation	Compensation for any losses; Stable payment of	Inadequate compensation; Lifestyle changes	4	3	Continue with stakeholder consultation and dialogue in order to identify land issues

of WTGs.	servitude fees				
Local community representatives – Udobne, Starokozache, Semenivka, Moloha	Creation of new workplaces; Improvements in local infrastructure (i.e. energy, roads, schools)	Environmental and social issues	3	3	Continue with stakeholder consultation and dialogue Work to identify and manage issues / expectations Hold regular meetings with community leaders and residents Keep the community apprised of all Project progress
Local community members – Udobne, Starokozache, Semenivka, Moloha	Improvements in local infrastructure (i.e. energy, roads, schools)	Lifestyle changes Environmental and social issues	2	1	Continue with stakeholder consultation and dialogue Work to identify and manage issues / expectations Ensure that vulnerable groups are identified and engaged with, including but not limited to pensioners, families with many children, and those with health conditions, all of whom may have special expectations and concerns Hold regular meetings

					with community residents Keep the community apprised of all Project progress
Vulnerable Groups, such as Roma Groups. Potentially other vulnerable groups such as those living below the poverty line, single headed female households.	To ensure their voice is heard and avoid marginalization.	Lifestyle changes, marginalization Environmental and social issues	2	1	Ensure vulnerable groups are included in stakeholder engagements detailed above by actively identifying such groups and ensuring they are process is inclusive.
Bilhorod-Dnistrovskiy Administration, Mayaky, Starokozache, Semenivka, and Moloha, village council administrations, including departments in charge of land affairs and environmental protection	Improved environmental state within the villages and district; Improved infrastructure (energy, roads, and other local investment through CSR program) Increased revenue Improved economic conditions and labor conditions	Environmental deterioration; Failure to comply with national requirements Social issues	2	4	Continue with stakeholder consultation and dialogue

	Local investment through CSR program				
UPR Senior Management	Project implementation as planned	Project delays, failure or closure	5	5	Continue with stakeholder consultation and dialogue
Interested NGOs and other organizations	Improvement in the quality of environment	Use of alternative energy sources; Transparent communication and decision-making process	1	3	Maintain open and transparent dialogue
Relevant national and regional authorities, for example: Ministry of Ecology and Natural Resources of Ukraine and Ministry of Culture of Ukraine (Archaeological studies)	Strict compliance with national legislation; Improvement in the quality of the environment; Improved economic and labor conditions	Environmental deterioration; Failure to comply with national legislation and regulation	2	5	Continue with stakeholder consultation and dialogue
Internal Stakeholders					
UPR Employees	Project implementation as planned; Retention of	Job loss; Transparent recruiting process	4	3	Establish and communicate labor policies

	employment; Improved working conditions				
Temporary construction workers and subcontractors	Employment opportunity; Improved working conditions	Transparent recruitment process	3	2	Transparent and early communicate regarding recruitment process and policies

6. Disclosure of Information and Stakeholder Engagement

6.1 Overview

This SEP is developed to address community concerns with regard to key environmental and social risks through implementation of the stakeholder consultation and information disclosure activities.

6.2 Stakeholder Consultation and Information Disclosure

The stakeholder consultation and information disclosure will cover the following main tasks:

- Timely disclosure of Project information
- Informed participation and meaningful two-way consultation with the affected stakeholders
- Development and implementation of a grievance mechanism to ensure that the affected stakeholders' concerns and issues are addressed

6.3 Information Disclosure

The NTS, EIA, ESAP, SEP, and Supplemental ESIA will be published on the UPR official website, (www.ukrainepowerresources.com) in Ukrainian and in English. Recognizing the multicultural environment in which the Project will operate, UPR will also provide translations of documents or document sections into minority languages spoken in parts of the Project affected area, i.e. Russian, if such requests are received. At a minimum, the NTS will be published in Russian.

UPR managers and staff will cooperate with relevant local municipal authorities and departments during project design and throughout the implementation of each Project component. Regular meetings will be held to discuss any issues and progress reports will be submitted by UPR.

UPR with the assistance of local municipal authorities and local community councils will ensure that the local population, particularly residents and businesses living or operating in the vicinity of the Project or using land which may be affected are informed about the project. This particularly pertains to the startup of construction activities and expected impacts.

6.4 Consultation Methods

The National EIA was submitted to the relevant Ukrainian authorities during May 2018. A public consultation process, as defined by Law of Ukraine "On Environment Impact Assessment" (No. 2059-VIII) was held from 30 May to 28 September 2018 (see Section 4). Formal conclusions and approval on the EIA report public discussions were published in the National EIA register on the website of the Ministry of Ecology on 25 October 2018

A meeting will be held with owners and users of private and public land that will be disturbed during construction for the transport and installation of WTGs before construction begins. The topics to cover will include evaluation of crop and other damages, mechanism for making claims and receiving payment, any land use restrictions as well as expected difficulties in accessing land plots during road upgrades.

7. Disclosure of Information & Stakeholder Engagement Plan

UPR recognizes that a critical aspect of engagement is to provide information to stakeholders in a manner that they are most comfortable with, and likely to engage with. The table below presents the proposed engagement methods identified for each stakeholder group.

Stakeholder/s	Engagement method	Responsibility	Timing
External Stakeholders			
People residing (or using land) and owners of businesses operating in Project affected areas where land has been or will be acquired, as well as areas expected to be impacted by transportation. This includes areas of local communities Udobne, Starokozache, Semenivka, and Moloha.	<p>Information delivered to residents / businesses using the land or operating in areas affected by the Project, through community meetings, as well as public notice boards (in Bilgorod-Dnistrovskiy district and in local communities – Udobne, Starokozache, Semenivka, and Moloha) and safety signs.</p> <p>Local media</p> <p>ESIS, ESAP and SEP published on the UPR website (www.ukrainepowerresources.com) and in locations noted above</p> <p>UPR with the assistance of local municipal authorities and local community councils will ensure that the local population, particularly residents and businesses living or operating in the vicinity of the Project or using land which may be affected are informed about the project. This particularly pertains to the startup of construction</p>	UPR Development Team	Throughout the implementation of the Project, as appropriate

	activities and expected impacts.		
Users of private and public land that will be disturbed during the transport and installation of WTGs.	Public meeting to explain the construction process and its impacts on land as well as the planned compensation measures and how they will be executed. Announced in public notice boards and in local media.	UPR Development Team	Prior to commencement of construction activities
Local community representatives – Udobne, Starokozache, Semenivka, Moloha	Regular communication by phone or through meetings, project progress updates and reports	UPR Development Team	All Project phases
Stakeholder/s	Engagement method	Responsibility	Timing
<i>External Stakeholders</i>			
Bilhorod-Dnistrovskyi Administration, Mayaky, Starokozache, Semenivka, and Moloha, village council administrations, including departments in charge of land affairs and environmental protection	Official correspondence and meetings, project progress updates and reports Permitting procedures	UPR Senior Management	Prior to commencement of construction activities and during implementation
UPR Senior Management	Regular reporting on project progress, impacts and undertaken measures	UPR Development Team	Throughout the implementation of the Project
Interested NGOs and other organizations	Local Media ESIS, ESAP and SEP published on the UPR website	UPR Development Team	Throughout the implementation of the Project
Relevant national and regional authorities, for example: Ministry of Ecology and Natural Resources of Ukraine	Official correspondence and meetings, progress reports Permitting procedures	UPR Senior Management	During project design

All stakeholders	<p>Public disclosure</p> <p><u>Start of disclosure period:</u> UPR website and EBRD website Local media, including newspapers and social media</p> <p>UPR will host a public meeting during disclosure period to disclose and receive public comments</p> <p><u>End of disclosure period:</u> UPR to schedule a public meeting to feedback outcome of disclosure process</p>	UPR Senior Management	Leading up to and at the end of disclosure period
<i>Internal Stakeholders</i>			
UPR Employees	Bulletin board Grievance procedure Code of conduct	UPR Senior Management	Throughout the implementation of the Project
Temporary construction workers and subcontractors	Information in contract, bulletin board, training Grievance procedure Code of conduct	UPR Senior Management	Upon the selection of subcontractors and during construction

8. Monitoring, Reporting and Responsibilities

UPR will develop annual environmental and social reports which will describe Project impacts, undertaken mitigation and enhancement activities and a summary of processed external grievances. These reports will be posted annually on the UPR website and will be provided to all interested stakeholders, including the EBRD.

UPR has been supporting numerous development opportunities and activities in the affected local communities and at the national level. UPR has implemented a Corporate Social Responsibility Program, which is described in more detail in the ESIS.

9. Grievance Mechanism

UPR will initiate to implement a formal grievance (complaint) procedure during the early stages of the Project to receive the affected communities' concerns and views. The complaint procedure will be used as a tool to assist the timely and successful resolution of stakeholder concerns, as well as to monitor the Project's relationship with the affected communities during the different phases of the Project, including design, construction, operation, closure and post closure activities. It is important that the mechanism be impartial, transparent and fair. A summary of complaints and the measures taken to resolve them will be made public on a regular basis, in accordance with PR 10.

UPR and the Contractor(s) will receive and consider all comments and complaints associated with the Project. A sample of the Project Public Grievance Form is provided at the end of this document (Appendix A). Any person or organization may send comments and/or complaints in person, by phone or via post or email using the contact information provided at the end of the document.

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. Complainants may remain anonymous.

All grievances will be registered and acknowledged within 5 working days and responded to within 20 working days of receiving the grievance. Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

Grievances will be solved according to the following steps:

Step 1: Receive and register grievance

Step 2: Screen and Assess

Step 3: Act to resolve locally if appropriate:

*If no, reject complaint or refer as appropriate. Communicate decision to complainant.
If yes, see Step 4*

Step 4: Define Approach

Step 5: Implement Approach
Step 6: Track and Document
Step 7: Evaluate whether issue is resolved

If no, revise approach.

Step 8: Process feedback and learn.

UPR will monitor the way in which grievances are being handled by the Contractor(s) and ensure they are properly addressed within deadlines specified above.

UPR will keep a grievance log of all grievances (including those received and addressed by the Contractor(s)), based on which grievance management reports will be produced and included in the annual environmental and social reports, posted on the UPR website and submitted to interested stakeholders including the EBRD.

In cases when the complainant is not satisfied with the way his / her grievance has been responded to or handled and re-submits it, UPR will invite representatives of the relevant local community to participate in the process so that a mutually agreed solution is identified and implemented. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Ukraine.

A separate, internal grievance mechanism is available for UPR employees and will also be made available for contracted workers, once they begin working.

10. Contact Details for the Public

Ukraine Power Resources, LLC

Contact person: Iryna Bondarenko, Team Coordination

Address: 4th Floor, 17/52 Bogdana Khmel'nitskogo Street, Kyiv, Ukraine 01030

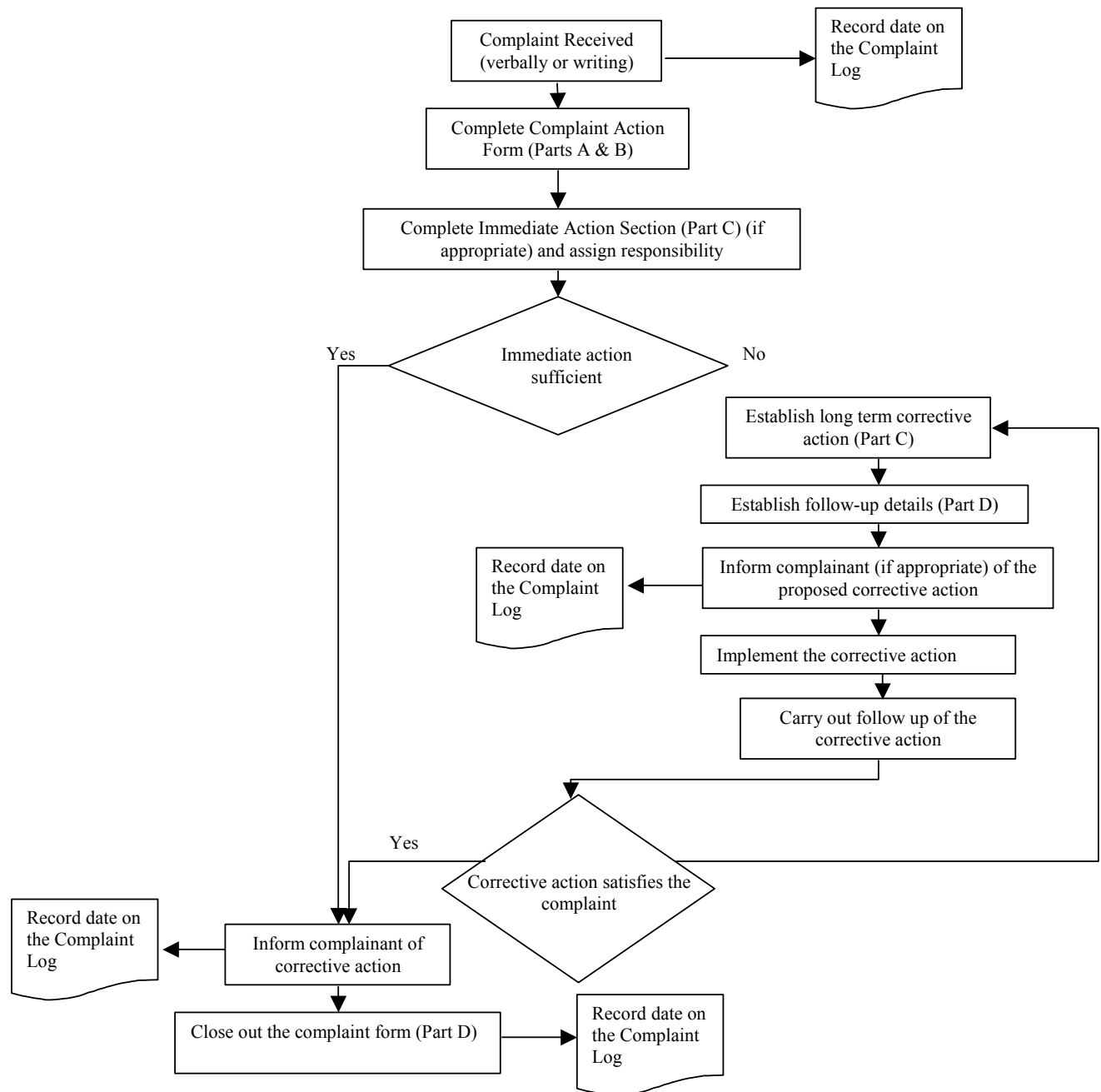
Tel: +38 097 951 09 25

E-mail: ibondarenko@ukrainepowerresources.com

Web address: www.ukrainepowerresource.com

Contact details of the Contractor (s) will be added subsequently, when the Contractor(s) have been identified.

Appendix A - Complaints Procedure & Grievance Form



APPENDIX A – Complaints Sample 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	<input type="checkbox"/> I wish to raise my grievance anonymously (please note that if you elect to remain anonymous a response cannot be provided) <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information and preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide postal address: <hr/> <hr/> <hr/> <input type="checkbox"/> By Telephone: <hr/> <input type="checkbox"/> By E-mail: <hr/>
Language Please mark your preferred language for communication	<input type="checkbox"/> Ukrainian <input type="checkbox"/> Russian <input type="checkbox"/> Other
Description of incident or grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem?	
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?	

Please return this form to either of the contacts below:

Ukraine Power Resources, LLC
Contact person: Iryna Bondarenko, Team Coordination
Address: 4th Floor, 17/52 Bogdana Khmelnytskogo Street, Kyiv, Ukraine 01030
Tel: +38 097 951 09 25
E-mail: ibondarenko@ukrainepowerresources.com

Or, the Community Liaison Officer:

Vasyliy Kharchenko, Community Liaison Officer
Address: 4th Floor, 17/52 Bogdana Khmelnytskogo Street, Kyiv, Ukraine 01030
Tel: +380 050 282 6877
Tel 2: +380 067 291 9505

Appendix B:

Public Hearing Report as Appendix B

In English:

<https://www.dropbox.com/s/9d4eh43j3ql3kku/DWPP%20National%20EIS%20Public%20Hearing%20Report%2025.10.2018%20eng.pdf?dl=0>

In Ukrainian:

<https://www.dropbox.com/s/4audhma902zv8mx/DWPP%20National%20EIS%20Public%20Hearing%20Report%2025.10.2018%20ukr.pdf?dl=0>