# **FICHTNER**



Renewable Energy Programme ESM

KfW

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project "Renewable Energy Programme ESM Component 1: Rehabilitation of six Hydropower

# List of Abbreviations

EIA Environmental Impact Assessment

ESM Elektrani Severna Makedonija / Power Plants of Severna Makedonija

ESSRA Environmental and Social Site Risk Assessment

GRM Grievance Redress Mechanism

HPP Hydropower Plant

IFC International Financial Corporation

JSC Joint Stock Company

KfW German Development Bank

kV Kilo Volt

MoEPP Ministry of Environment and Physical Planning

M+R Monitoring and Reporting

NGO Non-government Organization

NTS Non-technical Summary
OIP Other Interested Parties

PIU Project Implementation Unit SEP Stakeholder Engagement Plan

WB World Bank

#### 1 Introduction

The KfW Development Bank (KfW) is considering providing finance to Republic of North Macedonia to fund the rehabilitation of six hydropower plants (HPP) (the Project) in the country.

The investment will be implemented by the Joint-stock Company (JSC) Elektrani na Severna Makedonija (ESM). The beneficiary of the loan will be ESM. The rehabilitation of six hydropower plants is a part of the Programme "Renewable Energy Programme" of the ESM.

#### 1.1 Objective and Scope of the Stakeholder Engagement Plan (SEP)

Stakeholder engagement is an exclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsible relationship that are important for successful management of projects environmental and social risks. Communicating early, often, and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays. In addition, the plan assists in managing stakeholder expectations which will have a bearing throughout the lifespan of the project. Hence, this SEP provides a plan to interact effectively to support project interests.

In the special case the SEP not only considers the primary stakeholders which may be affected by the project. In addition, the plan also aims at including all those stakeholders who – e.g., as water managing entities, NGOs, the concerned municipalities – may provide support and/or advice wherever needed during the project preparation and the rehabilitation work.

#### 1.2 Scope and Structure of the SEP

This document is a general SEP with general guidance on how to involve the public in all phases of projects, from their approval to their implementation.

Scope of the SEP shall be as outlined in the World Bank's (WB) ESS10<sup>1</sup>. The engagement will be planned as integral part of the project's environmental and social assessment and project design and the implementation process.

The Stakeholder Engagement Plan consists of the following Chapters:

- 1. Introduction
- 2. Project Description
- 3. Description of the Administrative, Policy and Regulatory Framework
- 4. Stakeholder Identification and Analyses
- 5. Previous Stakeholder Engagement Activities
- 6. Stakeholder Engagement Plan
- 7. Grievance Redress Mechanism
- 8. Monitoring and Reporting.

This SEP will be updated as necessary.

<sup>&</sup>lt;sup>1</sup> Cf. World Bank (2018): Guidance Note for Borrowers. ESS10: Stakeholder Engagement and Information Disclosure. Washington.

# 2 Project Description

The area of Republic of North Macedonia, according to the terrain and climate conditions, offers great possibilities for using the running waters of rivers, construction of dams and the formation of additional accumulations. Hydro production accounts for 20% of total electricity production in JSC) ESM, primarily for meeting the daily variations in electricity consumption, therefore achieving greater flexibility of the power system.

The rehabilitation of six hydropower plants (HPP) is Component 1 of the "Renewable Energy Programme" of ESM.

The project encompasses the rehabilitation of the following hydropower plants and associated facilities:

- Mavrovo HPP system: It includes the Mavrovo cascade with the Vrben HPP, the Mavrovo reservoir and the Vrutok and Raven HPPs;
- In the context of Mavrovo, a 35 kV transmission line of approx. 13 km will be rehabilitated as well. HPP Vrben is located near the village Vrben and is at the southern slope of the mountain Vraca, in the upper basin of Radika River, making it one of the dams at the highest altitude. HPP Vrben and Mavrovo accumulation are within the NP Mavrovo, while HPP Vrutok and HPP Raven are part of the NP Shar Planina. The HPP Vrben plant is located six kilometers north of the Mavrovo reservoir. HPP Vrben is located 7 km west of city of Gostivar. HPP Raven is situated about 2 km downstream to HPP Vrutok. Coordinates of Mavrovo dam 41°41'47.46"N; 20°44'46.80"E;

Coordinates of HPP Vrben - 41°42'57.97"N;20°43'20.83"E;

Coordinates of HPP Vrutok - 41°46'15.08"N; 20°50'16.53"E;

Coordinates of HPP Raven - 41°46'45.43"N; 20°51'18.05"E;

- Spilje HPP near the town of Debar at the foot of the Spilje Dam, which embanks the Crn Drim and Radika rivers; Coordinates of HPP Spilje - 41°29'36.31"N; 20°30'8.15"E;
- Globochica HPP located at halfway between Lake Ohrid and Debar, about 8 km downstream of Globochica Dam; Coordinates of HPP Globochica -41°23'40.35"N; 20°35'6.89"E, Coordinates of Globochica dam - 41°20'12.57"N; 20°38'4.97"E;
- Tikvesh HPP, located about 15 km west of the town of Kavadarci at the foot of the Tikvesh Dam.
   Coordinates of HPP Tikvesh 41°24'9.34"N; 21°56'15.77"E.

The interventions in the Project are limited to the replacement or improvement of existing facilities. These include repair, improvement, or replacement of hydro and electromechanical components (valves, turbines, generators, transformers, etc.) and repairs and improvements to the building fabric. The upgrading will increase the reliability and safety of the HPPs, reduce water pollution from oil leakage and use the existing flow rate for energy.

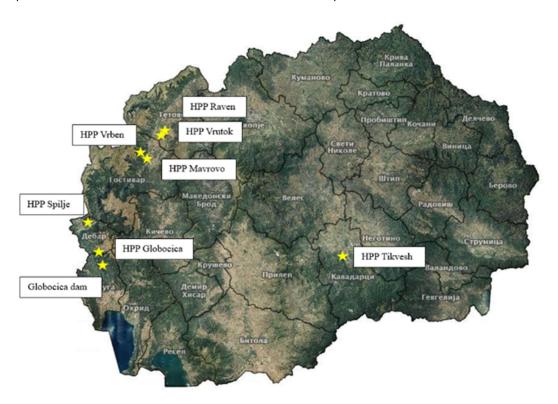
All interventions will take part within the built-up and fenced grounds of the mentioned HPPs with one exception: For Mavrovo, a ~13,85 km long existing high voltage electricity line will be rehabilitated by replacement of the cables. In order to access the line an existing servitude road will be used but the works may require crossing of adjacent areas.

General objectives of project activities are the following:

- increased reliability in the operation of HPP
- increasing the efficiency
- increasing the efficiency of power plants
- increasing the installed power capacity of six major hydropower plants in the country through their rehabilitation
- reduced greenhouse gas emissions.

#### 2.1 Macro Location of the Project

The Project area includes the Municipality of Gostivar, Municipality of Mavrovo and Rostushe, Municipality of Struga, Municipality of Debar and Municipality of Kavadarci. The following maps show the position of the HPP's located in the mentioned municipalities.



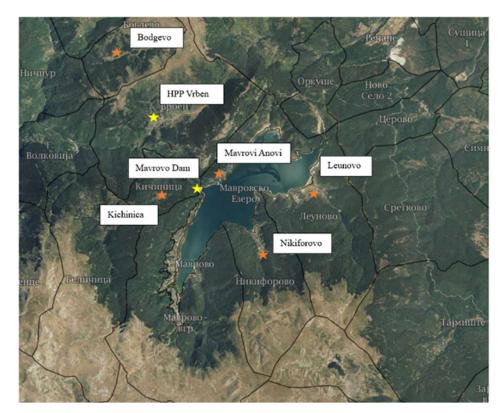
Source: Agency for Real Estate Cadaster for North Macedonia

Figure 1: Position of all Project HPP's

## 2.2 Micro Locations of the Project / Areas of Influence

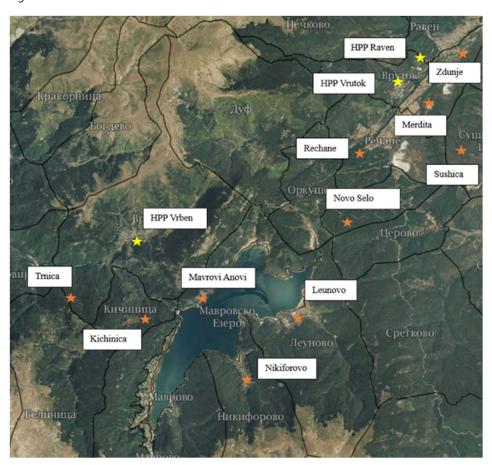
I. Mavrovo hydropower system with the three power plants: HPP Vrutok, HPP Raven, and HPP Vrben and the total accumulation of 275.000 m³ of water is one of the largest and most complex in the Macedonian power system. During the project activities some of the settlements located near the Mavrovo hydropower system will be affected² mainly by additional traffic volume (including heavy transport). The following maps show the Mavrovo hydropower system and project affected settlements.

<sup>&</sup>lt;sup>2</sup> "Affected" in the context of this report means mainly that rehabilitation works takes place within the territory of a municipality or a settlement. It does not mean that there must be potentially impacts or any damage or other impairments.



Source: Agency for Real Estate Cadaster for North Macedonia

Figure 2: Settlements near the Mavrovo accumulation



Source: Agency for Real Estate Cadaster for North Macedonia

Settlements near the Mavrovo Hydropower System Figure 3:

Project affected<sup>3</sup> municipalities in which the Mavrovo Hydropower system is located are the Municipality of Gostivar and Municipality of Mavrovo and Rostushe. The project affected settlements and most probably some small irrigation areas are located close to the HP units of the system, and the intakes. Two protected areas are affected by the implementation of this project, the National Parks (NP) Mavrovo and NP Shar Planina (adjacent in the north of Mavrovo).

HPP Spilje is located at Lake Debar. Near the power plant there is no populated settlement. However, along the river Crni Drim there are the settlements of Otishani and Dzepishte. Project affected municipality is the municipality of Debar.



Source: Agency for Real Estate Cadaster for North Macedonia

Figure 4: Settlements near the HPP Spilje

HPP Globochica is located within the borders of the Municipality of Struga. The project affected settlements are given on the next map.

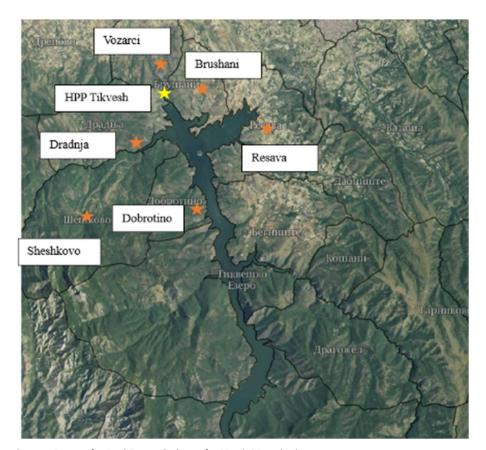
<sup>&</sup>lt;sup>3</sup> Affected "in the context of this report means mainly that rehabilitation works takes place within the territory of a municipality or a settlement. It does not mean that there must be potentially impacts or any damage or other impairments.



Source: Agency for Real Estate Cadaster for North Macedonia

Figure 5: Settlements near the HPP Globochica

HPP Tikvesh has been constructed in the Municipality of Kavadarci near the settlement of Vozarci. The access road to the HPP crosses parts of this village. Near to Tikvesh HPP the "Strict Nature Reserve Tikvesh" is in the founding and development phase. Mainly in the northeastern and eastern parts of Lake Tikvesh there are about 2,500 (weekend) houses which were mainly illegally constructed in the neighboring forest areas. According to local information and criticized by local NGOs the legalization of these houses is already advanced.



Source: Agency for Real Estate Cadaster for North Macedonia

Figure 6: Settlements near the HPP Tikvesh

The following table provides an overview of the settlements in the vicinity of the HPP's.

Distance of the settlements from the HPPs Table 1:

Hydro Power Plant (HPP)	Municipality	settlements	Distance to HPP
LIDD Davies	NA i sin alita a af C a ati anu	Raven	0.41 km
HPP Raven	Municipality of Gostivar	Merdita	0.44 km
		Vrutok	0.13 km
LIDD Vm stale	NA. uni nimalita y af Cantiyyay	Rechane	2.05 km
HPP Vrutok	Municipality of Gostivar	Raven	2.23 km
		Merdita	2.10 km
		Vrben	0.80 km
HPP Vrben	Municipality of Mavrovo and	Mavrovi Anovi	3.27 km
	Rostushe	Bogdevo	3.61 km
	Municipality of Mavrovo and Rostushe	Mavrovi Anovi	0.23 km
Mavrovo		Leunovo	4.43 km
accumulation		Nikiforovo	2.99 km
		Kichinica	1.90 km
		Debar	2.16 km
HPP Spilje	Municipality of Debar	Otishani	3.33 km
		Dzepishte	6.07 km
		Piskupshtina	8.31 km
HPP	Municipality of Struga	Nerezi	6.56 km
Globochica		Bezovo	7.37 km
		Lukovo	5.00 km
		Vozarci	3.20 km
		Brushani	1.68 km
LIDD T'I		Resava	3.70 km
HPP Tikvesh	Municipality of Kavadarci	Dradnja	2.68 km
		Dobrotino	3.08 km
		Sheshkovo	4.43 km

# 3 Regulatory Requirements for Stakeholder Engagement

Implementation of the Project will follow the laws and regulations of the Republic of North Macedonia (RNM) as well as to consider applicable international standards and KfW requirements.

### 3.1 National Regulations and Requirements

The Republic of North Macedonia has adopted a number of international conventions, laws, executive regulations, and by-laws which are relevant for the stakeholder engagement processes in the context of internationally funded projects. An extensive list of the national laws and regulations, including international conventions which have been ratified is shown in Table 2.

Table 2: Macedonian Legislation

	3	
Legislative Area/ Stage of Project Permitting	Key Laws	Summary of Stakeholder Engagement Requirements
Public participation	Aarhus Convention on Access to Information, Public Participation in Decision-making, and Access to Justice in Environmental Matters (1998)	The primary objective of this Convention is to "guarantee the rights of access to information, public participation in decision-making, and access to justice in environmental matters". Thereby, it provides provisions which ensure "accountability of and transparency in decision-making and to strengthen public support for decisions on the environment"; "recognizes that the public needs to be aware of the procedures for participation in environmental decision-making, have free access to them and know how to use them"; "recognizing the importance of the respective roles that individual citizens, non-governmental organizations and the private sector can play in environmental protection".
Preparation of project documentation and related strategic studies (including Spatial Plans and Strategic Environmental Assessments)	Law on Urban and Spatial Planning (Official Gazette of the Republic of Macedonia, no. 51/05, 137/07, 91/09, 124/10, 18/11, 53/11, 144/12, 55/13, 70/13, 42/14, 44/15, 193/15, 163/16, 64/18, 168/18).	One of the fundamental principles of the process of spatial planning and organizing is to make the procedure of passing and executing the plans public. To provide this transparency, the councils establish a participatory body which transmits the citizens' and legal entities' attitudes, opinions and needs; this body monitors the planning process through making initiatives, guidelines, and suggestions for the preparation of project solutions for the respective municipality. The municipality carries out public presentation and public survey. A report on the conducted public presentation and public survey is prepared by an expert panel formed by the mayor. Based on that report, the panel sends written notification to each person who has submitted a questionnaire including a rationale for the acceptance or non-acceptance of his / her comments or suggestions. During the monitoring of the execution of this law, the state authority in

Legislative Area/		
Stage of Project Permitting	Key Laws	Summary of Stakeholder Engagement Requirements
· community		charge of the issues related to the spatial organization monitors the transparency in the work of the municipalities, the municipalities within Skopje City and Skopje City entire municipality, especially from the aspect of regular, in due time and complete informing of the citizens on the issues determined by this law.  The law regulates the system of spatial and urban planned development of Macedonia, including public information and participation throughout the process of development and adoption of urban and spatial planning documents.
	Law on Environment (OG of RM, no. 53/05, 81/05, 24/07, 159/08, 83/09, 48/10, 124/10, 51/11, 123/12, 93/13, 187/13, 42/14) and associated secondary regulation (OG of RM no. 74/05, 109/09, 36/12 and 44/13)	State authorities and municipalities are obliged to disclose project information and to allow participation in decisions related to the environment, and to provide stakeholders the opportunity to express their opinion during the decision-making procedure. Documents and studies should be available to the public in suitable places, and public discussions should be organized.
	Law on Construction (Official Gazette of the Republic of Macedonia, no. 130/2009, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16, 31/16, 39/16, 71/16, 132/16, 35/18, 64/18, 168/18, 244/19, 18/20).	Public to be included in the planning phase of infrastructure projects. The administrative authority must inform the municipalities and the public on land requirements. Concerned parties can present opinions, comments, and demands, which the investor and the designer should review and appropriately accept and incorporate into final project. Comments and the demands which cannot be accepted should properly be explained and the concerned parties informed.
	Law on Access to Public Information (Official Gazette of the Republic of Macedonia, no. 13/06, 86/08, 06/10, 42/14, 148/15, 55/16, 64/18, 101/19).	Free access to public information is granted to all legal and physical entities, as well as foreign legal and physical entities. Any legal and physical entities may request information without discrimination, and may demand access to the information verbally, in written or electronically. Each entity has a right to access holder's information.

Legislative Area/ Stage of Project Permitting	Key Laws	Summary of Stakeholder Engagement Requirements
EIA <sup>4</sup> and Environmental Permit Process	Law on Environment (Official Gazette of the Republic of Macedonia, no. 53/05, 81/05, 24/07, 159/08, 83/09, 48/10, 124/10, 51/11, 123/12, 93/13, 187/13, 42/14, 44/15, 129/15, 146/15, 192/15, 39/16, 99/18).	The public should be involved in every stage of the (Environmental Impact Assessment) EIA procedure, and all decisions made during the process should be published in appropriate media according to legislation requirements. This applies to the following:  • notification of intention for project implementation  • EIA screening decision  • EIA scoping decision  • announcement of availability of EIA study  • non-technical summary (NTS) of EIA study  • report on adequacy of EIA study  • decision on granting consent to, or rejecting the application for the project  • right of submit appeal on Decisions according to the relevant national legislation.
Building Permit (Permit for Construction)	Law on Construction (Official Gazette of the Republic of Macedonia, no. 130/2009, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16, 31/16, 39/16, 71/16, 132/16, 35/18, 64/18, 168/18, 244/19, 18/20).	Decision for approval of the Environmental Protection Report issued by the Ministry of Environment and Physical Planning (MoEPP). Approval of the EIA Study is a precondition for approval of the Infrastructure Projects. EIA decision, building permit and other related documents and permits will be published electronically. Legal and physical entities have the right to submit appeal on the building permit within 15 days after issuing the permit. Construction permit is issued by the Ministry of Transportation and Communication unless opposition is expressed by the public attorney or other affected or interested parties. The administrative authority is obliged to review and respond to opposition.
Legal rights of persons directly affected by the rehabilitation project, e.g., neighbours	Law on Acting upon Complaints and Proposals (Official Gazette of Republic of Macedonia, no. 82/2008, 13/13, 156/15, 193/15) and Rulebook on the Manner of Action upon Complaints and Proposals (Official Gazette of Republic of Macedonia no. 2/09).	Under the Constitution, each citizen has the right to submit complaints to the authorities and receive answers. The relevant authority must appoint an authorized person or organizational body to act upon the complaints. If the applicant does not receive an answer, an appeal may be made to the Ombudsman of Republic of North Macedonia. The execution of this law is supervised by the Ministry of Information Society and Administration.

<sup>&</sup>lt;sup>4</sup>Note – in R North Macedonia, the document is termed an EIA, whereas the terms ESIA/ESAR are increasingly used internationally, including WB.

#### 3.2 International Requirements and Best Practice (WB/IFC/KfW Policies)

The Project should meet the requirements of the KfW, which widely follows the WB group standards and policies. Thus, stakeholder engagement and public consultation in the scope of the Project would follow the approach provided in the "Good Practice Handbook" on Stakeholder Engagement of the International Finance Corporation (IFC) from 2007. This SEP has been developed in accordance with the WB "Environmental Social Standards". International finance institutions (IFIs) consider community engagement as being central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits.

One of the established WB standards that the borrower and the sub-projects will meet through the project life cycle is ESS 10. "Stakeholder Engagement and Information Disclosure" that recognizes "the importance of open and transparent engagement between and project stakeholders as an essential element of good international practice". Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such
  engagement as early as possible in the project development process and in a timeframe that enables
  meaningful consultations with stakeholders on project design. The nature, scope and frequency of
  stakeholder engagement will be proportionate to the nature and scale of the project and its potential
  risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS10: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclosure as part of the environmental and social assessment, a document record of stakeholder engagement including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank 2017: 98).

A Stakeholder Engagement Plan" proportionate to the nature and scale of the project and its potential risks and impacts need to be developed by the borrower. It has to be disclosed as early as possible, and before project appraisal, and the borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP.

#### Gap Analysis Table 3.3

Stakeholder engagement shall be carried out in accordance with the applicable Macedonian legislation and requirements of KfW which follows the WB group standards and policies. Table 3 below provides the comparative analysis between the national legislation and requirements of KfW which follows the WB group standards and policies and proposed responses to overcome the gaps in the sphere of stakeholder engagement. The table describes the details of the comparison. This analysis also includes measures to bridge these gaps.

Table 3: Gap Analysis

Issue	KfW/ WB policy requirements and standards	Provisions of NR Macedonian law	Gap / Comment	Proposed response
Stakeholder Engagement Plan (SEP)	KfW and WB require the preparation of SEP in which the client or other responsible entity specifies the procedures, actions and measures related to the stakeholder engagement.  The SEP shall be prepared in order to describe the information, communication and engagement of the stakeholders  The objectives of the development of SEP are the following:  • to establish a systematic approach to stakeholder engagement  • to access the level of stakeholder interest and support for the project and to enable that stakeholder' views to be taken into project preparation phase and environmental and social performance  • to promote and provide means for effective and inclusive engagement  • to ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. <sup>5</sup>	According to the Macedonian Law there is no need to develop a separate SEP. Within the ESIA there is a chapter related to the stakeholder engagement.	There is no provision related to develop SEP under the Macedonian legislative.	SEP will be developed (this present document).  Within the SEP the stakeholders will be identified, together with proposed type of information and way of communication. The SEP will provide for the early stakeholder communication, planned activities, Grievance Mechanism, Monitoring and Reporting.

<sup>&</sup>lt;sup>5</sup> WB/IBRD-IDA (2017): The World Bank Environmental and Social Framework, Washington.

Issue	KfW/ WB policy requirements and standards	Provisions of NR Macedonian law	Gap / Comment	Proposed response
Barrier free information	Disability-inclusive development is directly responsive to the World Bank's twin goals of ending extreme poverty and promoting shared prosperity. The "2030 Agenda for Sustainable Development" is disability-inclusive and highlights the need to empower persons with disabilities. The human rights of persons with disabilities to full and effective participation and inclusion in society on an equal basis with others are laid out in the Convention on the "Rights of Persons with Disabilities", which is close to universal ratification.	According to the Macedonian Law there is no need to develop a separate document for information of persons with disabilities.	There is no provision related to develop a separate document for information of persons with disabilities.	Within the SEP will be developed the separate document with key points of the project related to the information of persons with disabilities.
Grievance Mechanism	KfW and WB require the establishment of an effective project	According to the	There are no provisions	A Grievance Redress
TYPECHULISHI	level grievance mechanism as early as possible in the framework of the SEP. The Grievance Redress Mechanism will be established before the start of the project activities in order to address specific concerns or interests about stakeholder engagement raised by project affected persons or interested parties. The grievance mechanism will be consistent with the objectives and principles pertaining to grievance management contained in Environmental and Social Standard 10. It will include a recourse mechanism designed to resolve disputes in an impartial manner. The outcomes of the grievance mechanism (including numbers of grievances received, resolved and outstanding) will be reflected in monitoring reports.	Macedonian Law there is no need to develop a separate grievance mechanism.	under national law related to establishing the project specific Grievance Redress Mechanism.	Mechanism will be established and implemented as it is defined in KfW and WB policies and their standards. ESM will establish a registry / log of grievances and will monitor the resolution of grievance will be recorded in a registry / log with all necessary information.

# 4 Stakeholder Identification and Analysis

WB ESS10 recognizes two broad categories of stakeholders:

- project affected parties and
- other interested parties
- disadvantaged / vulnerable individuals or groups.

Project-affected parties include those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups including local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project.

The term "Other interested parties" (OIPs) refers to individuals, groups, or organizations with an interest in the project, which may be caused by the project location, its characteristics, its impacts, or matters related to public interests. For example, these other parties may include regulators, government officials, the private sector, the scientific community, unions, women's organizations and other civil society organizations and cultural groups.

Disadvantaged/vulnerable individuals or groups refer to those persons who often for various reasons do not have a voice to express their concerns or understand the impacts of a project.

Table 4 below describes the stakeholders who have been identified so far during the project preparation activities. However, it is important to mention that stakeholder engagement represents an ongoing process. Thus, this plan may be subject to potential amendments and updates in case any new stakeholders were identified over the course of the project life cycle.

Table 4: Stakeholder Identification and Mapping

Stakeholder	Role and connection to the Project	Method of communication
National government stake	eholders	
Joint Stock Company Elektrani of North Macedonia ESM	ESM is responsible for the implementation and supervision of the Project. ESM is responsible for the contractor selection process, whereby they will be in charge of cooperation, monitoring and communication with the contractor.	<ul> <li>individual meetings</li> <li>regular reports from the Contractor about the project activities and onsite management</li> <li>reviewing of the preparation and implementation of Elaborate ESSRA; NTS; SEP; Grievance mechanism.</li> </ul>
Public Institution National Park MAVROVO  Public Institution National Park SHAR PLANINA	Responsible for management of the protected areas in which HPPs or other technical facilities are located.	<ul> <li>individual meetings with both NPs</li> <li>participation in public consultation meetings</li> <li>official Request for entrance NPs (Mavrovo and Shar Planina) to be submitted to the MoEPP and the NPs Administration – ESM/Contractors.</li> </ul>

Stakeholder  Ministry of Agriculture	Role and connection to the Project  JSC Branch Offices are	Method of communication
Ministry of Agriculture, Forestry and Water Economy of the Republic of North Macedonia JSC Branch Office Crni Drim in Ohrid and JSC Branch Office Tikvesh in Kavadarci	responsible for water management (irrigation) in the project areas.	<ul> <li>individual meetings</li> <li>participation in public consultation meetings</li> <li>official correspondence.</li> </ul>
Local government stakeho	lders	
Project affected municipalities (Municipality of Gostivar, Municipality of Mavrovo and Rostushe, Municipality of Debar, Municipality of Struga, Municipality of Kavadarci)	Municipalities will cooperate with the contractor in relation to road aspects, land use planning and communal infrastructure. There is the need to be consulted before and during the rehabilitation phase in order to ensure that all the rehabilitation works are aligned with the accepted plans and initiatives.	<ul> <li>individual meetings</li> <li>participation in public consultation meetings</li> <li>official correspondence.</li> </ul>
Public utilities companies in the project affected municipalities	These companies are in charge of providing water supply and sanitation services to the local communities, thus they must be consulted before and during rehabilitation in order to ensure that all the project activities are aligned with the existing local infrastructure and plans for the future development.	<ul> <li>individual meetings</li> <li>regular communication with the contractor</li> <li>approval of construction works related to communal infrastructure if e.g., road Mavrovi Anovi-Mavrovo would temporarily be closed); There is an alternative road to all settlements during this temporarily closures.</li> <li>The temporary Traffic Plan should be developed and approved</li> <li>official correspondence.</li> </ul>
Contractor/sub-contractor Selected contractor and sub-contractor(s)	These stakeholders are going to implement the project in terms of construction activities. Their role in successful implementation of the project is crucial since they must comply with all the legal, regulatory, technical, traffic, environmental and social requirements in standards throughout the course of the project.	<ul> <li>monthly reporting to ESM</li> <li>participation in public consultation meetings</li> <li>official correspondence, meetings, codes of conduct, information in contract on standards and expectations with respect to environmental protection, health and safety at work, security, access to sites, and interaction with communities</li> <li>regular monitoring performance of contractors in the implementation of the project activities</li> <li>provision of relevant documents in tender.</li> </ul>

#### **Local community stakeholders**

#### Local communities in the project affected settlements

The inhabitants of project affected settlements could be affected by transportation of heavy equipment for the rehabilitation of HPPs, the influx of workers, etc.

- information through adequate media e.g., websites of the municipality, TV stations, local radio, social media/facebook of the municipality, municipal information boards at the municipal administrative building, local newspapers
- official correspondence with the leaders and representatives of the municipality and the concerned settlements
- public and individual meetings and explanations of the project
- information about the prepared project documents (ESSRA; NTS; ESMP, SEP)
- public consultation meetings. Communication through the bulletin boards by posting project information/ notices
- specific targeted information for inhabitants of the affected settlements on HPPs rehabilitation and possible dangers associated with these activities.

**Vulnerable** groups/individuals: Elderly people, multi-child families, single-parent families, including woman-headed households, families registered as living below the poverty level, people with disabilities, internally displaced people as stakeholders could possibly be identified during the project implementation process.

Vulnerable groups/individuals must be taken into account due to the fact that they may be disadvantaged in terms of access to information and/or some project activities. Thus, they may need specific assistance in terms of accessing all the relevant project resources and information.

- Targeted communication with the identified vulnerable groups/ individuals via phone or meeting with them in person. For the communication with persons with disabilities within the SEP will be developed the separate document with key points of the project.
- assistance throughout the project lifecycle.

#### Local businesses in the project area

Their businesses may be affected due to rehabilitation; thus they must be consulted in order that they could be provided with all the necessary compensation/assistance which would enable them to maintain their business operation on the pre-project level.

- information through adequate media
- public and individual meetings and explanations of the project
- information about the prepared project documents (ESSRA; NTS; SEP)
- public consultation meetings. Communication through the bulletin boards by posting project information/ notices.

Stakeholder	Role and connection to the Project	Method of communication
Educational institutions in the immediate and wider project area	Pupils/students may be affected during rehabilitation due to potential increase in traffic flow. They must be provided with uninterrupted and safe road access so that the transportation of parts and workers would not jeopardise their daily commute. Local educational institutions will be informed about all project activities especially in regard to the planned transportation works which may alter the regular traffic flow.	Official correspondence:     Information through e-mails,     letters, or phone calls.
Hospitals/health facilities in the near vicinity (e.g. access roads)	All hospitals/health facilities next to the access roads to project areas must be provided with uninterrupted and safe access possibilities to their institutions during the entire construction phase in order to avoid hindering their workflow / services. Local hospitals/health facilities must be consulted with and informed about all project developments at all times, especially in regard to the planned rehabilitation works which may alter the regular traffic flow (mainly transports	Official correspondence:     Information through e-mails,     letters, or phone calls.
Fire stations	from and to the HPPs).  Uninterrupted and safe road access must be provided to all the emergency vehicles. Local fire stations must be consulted with and informed about all project developments at all times, especially with regard to the planned rehabilitation works (mainly transports from and to the HPPs) which may alter the regular traffic flow.	Official correspondence:     Information through e-mails,     letters, or phone calls.
NGOs and civil society org		<ul> <li>official correspondence:         <ul> <li>Information through e-mails,</li> <li>letters, or phone calls</li> </ul> </li> <li>public consultation meetings and individual meetings.</li> </ul>

Stakeholder	Role and connection to the Project	Method of communication
The media		
National TV and radio stations, press, news portals	Selected national media will be actively involved in dissemination of project information.	<ul> <li>official correspondence: Sharing project-related information and updates (ESM).</li> </ul>
Local TV and radio stations, press, news portals	Local media will be actively involved in dissemination of project information.	<ul> <li>official correspondence: Sharing project-related information and updates (ESM).</li> </ul>

#### 5 Previous Stakeholder Activities

It was announced in the media the start of the project "Revitalization of Six Large HPPs in Macedonia" for long-term stability of the energy sector. The project was announced at the event prepared to mark the 65<sup>th</sup> anniversary of ESM. The project will be supported by the KfW Development Bank<sup>6</sup>.

During the development of the project documentation related to the environmental and social aspects for rehabilitation of six HPPs in Macedonia, the representatives from FICHNTER & GEING CONSORTIUM conducted various meetings with the local authorities (mayors or secretaries of the municipalities), with the management of the JSC Water Economy branch offices in Ohrid and Kavadarci, representatives of the two National Parks - Shar Planina and Mavrovo, one local NGO in Kavadarci, as well as they visited all six HP Plants.

Consultation with these Project stakeholders has been integral to the project development. The stakeholder engagement will be carried out in a culturally sensitive manner at least ten days in advance of any substantial rehabilitation activity which might hamper their interests, and efforts will be made to ensure that stakeholders were appropriately represented. Particular attention will be paid to reach potentially marginalized or vulnerable individuals and groups of persons. The following table summarizes the consultations held for the preparation of this SEP.

Table 5: Project Consultations (Social Expert Team)

No.	Target group / attendees	ees Consultation		Notes
1.	<ul> <li>ESM officials Nevenka         Jakimova Filipovska -         Deputy Coordinator         (Electricity Production         Department)</li> <li>Social experts from         Fichtner GmbH &amp; Co. KG         &amp; GEING Team</li> </ul>	A kick-off meeting to discuss about the start of the project for rehabilitation of 6 HPPs in Macedonia. There is also a need for additional information.	5 Sep 2022	ESM provided team with overall information about the Project, project locations, rehabilitation of each HPP. They informed the consultants that the project activities related to the electrification of water intakes in the system "Sharski Vodi" is excluded.
2.	<ul> <li>ESM team:</li> <li>Darko Mickoski - Coordinator (Electricity Production Department);</li> <li>Nevenka Jakimova Filipovska - Deputy Coordinator (Electricity Production Department);</li> <li>Julija Siljanovska - Environmental Engineer;</li> <li>Experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team</li> </ul>	Kick off meeting in the premises of ESM in City of Skopje	9 Sep 2022	At the beginning of the meeting, all members of the project teams were introduced and the type of project activities for the rehabilitation of 6 HPPs for III phase was discussed. It was also discussed about the necessary documentation that should be submitted by the ESM team to the GEING and Fichtner teams

<sup>&</sup>lt;sup>6</sup> Government of the Republic of North Macedonia (2022) Kovačevski: Revitalization of large hydroelectric power plants for long-term stability of the energy system German aid for the Macedonian energy sector, published on 27 May 2022, <a href="https://vlada.mk/node/28968">https://vlada.mk/node/28968</a>, accessed on 21 September 2022.

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No.	Target group / attendees	Consultation	Period	Notes
3.	<ul> <li>Director, management, of the National Park Shar Planina and officials</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting to consider possible impacts on social environment.	5 Sep 2022	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation. The NP Shar Planina team expressed their concerns related to the level of the water mainly in the Sharski Vodi system. They also mentioned the possible concerns and reactions of the local inhabitants and impacts on water usage.
4.	<ul> <li>The Mayor of the Municipality of Gostivar</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	5 Sep 2022	Social experts provided the mayor a summary presentation of the scheduled rehabilitation activities. He expressed the preparedness to support the project. He suggested informative public meetings to be hold two or three months before the start of the rehabilitation activities.
5.	<ul> <li>Management of HPP         Raven</li> <li>Social experts from         Fichtner GmbH &amp; Co. KG         &amp; GEING Team.</li> </ul>	Informative consultative meetings with management about some specifics about the HPP Raven, their expectations, concerns, etc.	5 Sep 2022	Social experts were obtained with the set of key information about HPP Raven. The workplaces for rehabilitation works were shown.
6.	<ul> <li>Management of HPP Vrutok</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meetings with management about some specifics about the HPP Raven, their expectations, concerns, etc.	5 Sep 2022	Social experts were obtained with the set of key information about HPP Vrutok. The workplaces for rehabilitation works were shown.
7.	<ul> <li>Management of HPP         Vrben and Mavrovo dam     </li> <li>Social experts from         Fichtner GmbH &amp; Co. KG         &amp; GEING Team.     </li> </ul>	Informative consultative meetings with management about some specifics about the HPP Vrben and Mavrovo	6 Sep 2022	Environmental experts were obtained with the set of key information about HPP Vrben, Mavrovo dam, conveyor system, etc. The workplaces for

No.	Target group / attendees	Consultation	Period	Notes
		dam, their expectations, concerns, etc.		rehabilitation works were shown.
8.	<ul> <li>The General Secretary of the Municipality of Mavrovo and Rostushe</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	6 Sep 2022	Social experts provided the secretary of the municipality a summary presentation of the scheduled rehabilitation activities. He expressed the preparedness / commitment to support the project.
9.	<ul> <li>Director, head of the department for protection of the nature and IT officer of the Public Institution National Park Mavrovo</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting to consider possible impacts on social environment.	6 Sep 2022	Social experts provided the secretary of the municipality a summary presentation of the scheduled rehabilitation activities and discussed their concerns related to the project implementation. They expressed their concerns related to the level of water (biological minimum) and concerns related to the protection of the nature.
10.	<ul> <li>Management of HPP Spilje</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meetings with management about some specifics about the HPP Spilje.	6 Sep 2022	Social experts were obtained with the set of key information about HPP Spilje, most common problems they face, etc. The workplaces for rehabilitation works were shown.
11.	<ul> <li>The Mayor of the Municipality of Debar</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	7 Sep 2022	Social experts provided the mayor of the municipality a summary presentation of the scheduled rehabilitation activities and presented their expectations related to the project implementation. The mayor expressed the concerns related to the previous relations with the HPP Spilje and described the low level of social responsibility shown so far by ESM (e.g., no participation in social activities of the local community and of the municipality ).

No.	Target group / attendees	Consultation	Period	Notes
12.	<ul> <li>Management of HPP Globochica and Globochica dam</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team</li> </ul>	Informative consultative meetings with management about some specifics about the HPP Globochica and Globochica dam, their expectations, concerns, etc.	7 Sep 2022	Social experts were obtained with the set of key information about HPP Globochica and Globochica dam. The workplaces for rehabilitation works were shown.
13.	<ul> <li>The Mayor of the Municipality of Struga, the employee in the municipality, director of Branch office of ESM in Struga</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	7 Sep 2022	Social experts provided the mayor and the town engineer with a summary presentation of the scheduled rehabilitation activities followed by a discussion about their expectations related to the project implementation. The mayor expressed his support of the project and noted that the municipality in cooperation with ESM would like to clean the riverbed on Crni Drim from Struga to the Dam Globochica.
14.	<ul> <li>Management of JSC         Water Economy Crni Drim         - Ohrid</li> <li>Social experts from         Fichtner GmbH &amp; Co. KG         &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	7 Sep 2022	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation. The JSC manager explained that less than 1% of the Drim Water is used for irrigation. and that their company is responsible for the maintenance of the riverbed of Crni Drim. They did not express any concerns about the project implementation.
15.	<ul> <li>Management of HPP         Tikvesh</li> <li>Social experts from         Fichtner GmbH &amp; Co. KG         &amp; GEING Team.</li> </ul>	Informative consultative meetings with management about some specifics about the HPP Tikvesh, their expectations, concerns, etc.	9 Sep 2022	Social experts were obtained with the set of key information about the HPP Tikvesh, Tikvesh dam. The workplaces for rehabilitation works were shown.

No.	Target group / attendees	Consultation	Period	Notes
16.	<ul> <li>The Mayor of the Municipality of Kavadarci and the head of the Department for Local Economic Development.</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	9 Sep 2022	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation. The mayor expressed his support to the project implementation. The municipality representatives mentioned that the inhabitants of the settlement Vozarci would most probably submit their requests for some support by the ESM due to the fact that they never benefited from the HPP before.
17.	<ul> <li>Management of JSC         Water Economy, Branch         office Tikvesh - Kavadarci</li> <li>Social experts from         Fichtner GmbH &amp; Co. KG         &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	9 Sep 2022	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation. The JSC manager noted that in 2020 and 2021 there was the situation that no water was available for irrigation during the period for which JSC had the license for using water from the lake. If this situation is related to the operation scheme of the HPP or due to the overall rainfall regime in the region is an ongoing discussion at present between JSC Water Economy Branch and ESM (both state owned companies). However, he supported the implementation of the project.
18.	<ul> <li>The president of the NGO Eco-life</li> <li>Social experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team.</li> </ul>	Informative consultative meeting about the project implementation.	9 Sep 2022	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation. The president expressed his concern about maintaining the biological minimum of

No.	Target group / attendees	Consultation	Period	Notes
	Project	Consultations (Tachnic	al Evport Too	Tikveshko Lake and protection of nature. His organization conducted some monitoring of the Tikveshko Lake related to the usage the water for electricity production and its influence on the level of the water. However, he supported the implementation of the project.
19.	HPS Mavrovo team:	Consultations (Technical Consultative	12 Sep	At the meeting the structure
19.	<ul> <li>Ejup Bekiri - Technical Manager;</li> <li>Tomce Janevski - Head of Civil Department;</li> <li>Zoran Ilievski - Head of Production Department;</li> <li>Zoran Angelov - mechanical maintenance engineer;</li> <li>Ruzica Milosheska Brchioska - electro engineer;</li> <li>Petar Jovanovski - responsible for OH&amp;S issues;</li> <li>Gazmend ?</li> <li>Experts from Fichtner GmbH &amp; Co. KG &amp; GEING</li> </ul>	meeting about the HPP Mavrovo.	12 Sep 2022	of HPS Mavrovo was discussed, which contains three HPPs and one accumulation: HPP Vrutok, HPP Raven, HPP Vrben and Mavrovo dam. The intake system of HPS Mavrovo is called Sharski vodi, which contains total 13 intakes. After the meeting, the project teams had conducted site visit of total 7 intakes: Prosevce, Kucibapska river, Vraca 1, Vraca 2, Mazdracha, Dumkovo and Lomnica.
20.	<ul> <li>Team</li> <li>HPS Mavrovo team:</li> <li>Ejup Bekiri - Technical Manager;</li> <li>Tomche Janevski - Head of Civil Department;</li> <li>Zoran Ilievski - Head of Production Department;</li> <li>Ruzica Milosheska Brchioska - electro engineer;</li> <li>Experts from Fichtner GmbH &amp; Co. KG &amp; GEING Team</li> </ul>	Informative consultative meeting about the project location and implementation.	13 Sep 2022	A site visit was conducted at: HPP Raven, HPP Vrutok, HPP Vrben, intake of Vrutochka river, transmission line (towers near village Rechane and NP Mavrovo) and Mavrovo dam.

No.	Tar	get group / attendees	Consultation	Period	Notes
21.		NP Mavrovo team: Tomo Gjorgjievski – Head of department of protection; Zafket Veapi – Head of department of sustainable use; Ikmet Ejupi - Protection and control officer; HPS Mavrovo team: Tomche Janevski - Head of Civil Department; Zoran Ilievski – Head of Production Department; Gazmend Fetahi – Manager of HPP Raven Experts from Fichtner GmbH & Co. KG & GEING Team	Informative consultative meeting held in the premises of the NP Mavrovo.	14 Sep 2022	At the meeting with the representatives from NP Mavrovo the type of project activities and their duration was discussed. Also, following issues were considered: Zoning of NP Mavrovo; Adoption of Management Plan of NP Mavrovo; Current status of lynx population, etc.
22.	•	HPS Crn Drin team: Gligor Jauleski - Head of Electro-Mechanical Maintenance; Marijan Glavicevski – responsible for ISO 14001 for HPP Spilje and HPP Globocicha; Slavko Milevski – Safety Manager; Zoran Manojlovic – responsible for environmental issues in HPP Spilje. Experts from Fichtner GmbH & Co. KG & GEING Team	Consultation activities about HPS Crn Drin - HPP Spilje, Debar/HPP Globocicha, Struga.	15 Sep 2022	At the meeting, the type of project activities for HPP Spilje and HPP Globocicha was discussed.  After the meeting, the project teams conducted site visit at HPP Spilje where following was considered: technical characteristics of each HPP, warehouse facilities, nearest settlements, identification of the surrounding biodiversity, etc.
23.		HPP Tikvesh team: Trajche Tefov – Technical Manager Gjoko Tashev – Manager at HPP "Tikvesh", Leader of team in: ISO 9001, ISO 14001 and ISO 45001. Experts from Fichtner GmbH & Co. KG & GEING Team	Consultative meeting and site visit.	16 Sep 2022	At the meeting, the type of project activities for HPP Tikvesh was discussed. After the meeting, the project teams conducted site visit at HPP Tikvesh, where following was considered: technical characteristics of HPP, warehouse facilities, nearest settlements, identification of the surrounding biodiversity, etc.

No.	Target group / attendees	Consultation	Period	Notes
24.	<ul> <li>ESM team:</li> <li>Darko Mickoski -         Coordinator (Electricity         Production Department);</li> <li>Nevenka Jakimova         Filipovska - Deputy         Coordinator (Electricity         Production Department);</li> <li>Julija Siljanovska -         Environmental Engineer;</li> <li>Experts from Fichtner         GmbH &amp; Co. KG &amp; GEING         Team</li> </ul>	Wrap up meeting in the premises of ESM in City of Skopje	16 Sep 2022	During the wrap up meeting a number of issues and key findings were summarized. After preliminary environmental and social risks assessment from the site visit, the consultant project team will propose appropriate mitigation measures and also will prepare project documentation according to ToR requirements.
25.	<ul> <li>NP Shar Planina         Administration:</li> <li>Anela Stavrevska -         Panajotova</li> <li>Fichtner team:</li> <li>Melanie Siems – Project         Manager</li> <li>Armen Bodoyan -         International         Environmental Expert;</li> <li>GEING Team:</li> <li>Tanja Nikolovska - EIA         Expert;</li> <li>Jelena Sekulovska -         Biodiversity Expert</li> </ul>	Informative consultative online meeting with NP Shar Planina National Park representative	25 Oct 2022	At the meeting, the type of project activities for HES Mavrovo – Sharski Vodi intakes, locations of visited intakes by the Technical Team, zoning of NP and their concerns were discussed. Main concerns raised by NP representative were lack of biological flow ensured for Mazdraca intake, to ensure enough water for irrigation on Polog Valley and existence of wet habitats near this intake.

# 6 Stakeholder Engagement Programme

This Stakeholder Engagement Plan has been prepared in respect to all the project phases, i.e., pre-rehabilitation, rehabilitation, post-rehabilitation (operation), whereby it takes into account all the identified stakeholders. As it has previously been mentioned, some of the planned stakeholder engagement activities may be constrained due to the restrictions imposed by the COVID-19 pandemic, thus each stakeholder engagement activity has been planned in the way that it provides a contingency approach to implementation of the planned activities and processes in the way that ensures that all the interested stakeholders are consulted with in a meaningful manner. A detailed stakeholder engagement plan is provided in the following table.

Table 6: Stakeholder Engagement Plan

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to COVID-19
Pre-rehabilitation	on phase (2022/2023)				
All stakeholders	Public disclosure of ESSRA A public consultation meeting should be held with representatives of the interested stakeholders prior to final approval of the ESRRA. When ESSRA is finalised and approved, it should be publicly disclosed on the website of ESM.	KfW Development Bank and ESM	Prior to finalisation and approval of ESSRA, i.e., during the ESSRA public disclosure phase.	<ul> <li>organisation of a public consultation meeting (with physical presence or via Zoom)</li> <li>announcement in the local media and websites of the ESM and project affected municipalities</li> <li>local notice boards</li> <li>notice board in project affected municipalities.</li> </ul>	Information about the public disclosure of ESSRA should be disseminated by e-mail and via the local media, and all the interested stakeholders shall be provided with contact information that they may use for submission of comments and/or complaints regarding ESSRA.
All stakeholders	Promotion of project timeline, Stakeholder Engagement Plan, ESSRA / Notification about the commencement of rehabilitation works. All interested stakeholders shall be informed about the planned project activities prior to start of rehabilitation work, whereby they should be informed about the extent of planned works, expected duration of rehabilitation and potential changes of traffic schedule. Additionally, this meeting will serve as a possibility to inform all interested stakeholders about	ESM and Contractor	Prior to commencement of rehabilitation	<ul> <li>announcements in the local and national media, leaflets, announcements on local notice boards, online news portals, communication with representatives of the local communities, etc.</li> <li>the warning signs to be temporary placed on the roads for speed reduction due to transportation of electro parts and materials</li> </ul>	In case where face-to-face interaction is not possible, all information about the commencement of project activities shall be disseminated through the local and national media (e.g., newspaper, TV, radio, online news portals, website of the ESM and project affected municipalities) and by e-mails to already identified relevant stakeholders).

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to COVID-19
Rehabilitation p	the environmental and social documentation which is going to be adopted as part of the project. Thus, this meeting aims at ensuring that all the relevant stakeholders are fully familiarised with all the available resources through which they can access information regarding the project and take further action in terms of their involvement in the project.			<ul> <li>distribution of printed documents to the relevant municipality offices (to designate the responsible person), local community offices, etc.</li> <li>No roads will be rehabilitated. However, warning signs could be placed at important congested traffic.</li> </ul>	
All stakeholders	Placement of bulletin boards at public locations in the project area (on the entrance of the HPPs)  The bulletin boards are going to be installed at the beginning of rehabilitation works and will be maintained throughout the rehabilitation phase.  Project-related information is also announced through placement of information notices/leaflets on the subject bulletin boards in all municipalities Concerned.	ESM and Contractor	Throughout the rehabilitation phase On-demand and in accordance with project progress	<ul> <li>placement of project-related announcements and relevant information on the bulletin boards in the project area (on the entrance of the HPPs)</li> <li>review and update of the information available at bulletin boards at least once per month.</li> </ul>	No alternative approach is required for this activity since communication is going to be carried out via the bulletin boards, thus it does not require direct contact with the stakeholders.

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to COVID-19
All stakeholders	Placement of Grievance boxes in the project area (on the entrance of the HPPs) Grievance boxes will be placed at the entrance of the HPPs, at clearly marked, visible and accessible locations, so that all the interested stakeholders can submit their grievances in person (local community members and/or workers). The grievance box will be checked by the Contractor on a weekly basis, and the grievances will be delivered to the ESM for further actions.	ESM and Contractor	At the time of commencement of rehabilitation works.	Grievance boxes and dissemination of information leaflets to the local communities.	Grievances may also be submitted via email, post or online and they will be available at ESM and project affected municipalities` websites.
All stakeholders	Dissemination of information about organisation of traffic during rehabilitation phase All stakeholders shall be regularly informed about the planned changes in traffic schedule (e.g., potential interruptions of traffic due to rehabilitation). Announcements shall be provided by ESM, in cooperation with the Contractor, and they shall be disseminated through the local media.	ESM and Contractor	Continuously throughout the rehabilitation phase	Announcements in the local media, e.g., radio, TV, newspaper, online news portals.	No alternative approach is required for this activity since communication is going to be carried out via the local media, thus it does not require direct contact with the stakeholders.

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to COVID-19
Local communities	Meetings with project stakeholders ESM will organise regular meetings with local communities during rehabilitation. These meetings will be attended by representatives of ESM, project affected municipalities and the contractor. Meeting minutes shall be prepared and disseminated among the relevant stakeholders.	ESM and Contractor	Quarterly throughout the rehabilitation phase	Information about the location and time of public consultation meetings will be posted at ESM's website and will also be disseminated via announcements in the local media (e.g., radio, newspaper) and by information notices which will be placed on bulletin boards in the local communities.	ESM will continuously monitor the proposed COVID-19 prevention measures and will organise the meetings accordingly. If public consultation meetings are not allowed during the rehabilitation phase, alternative approach shall include online meetings and phone communication with the relevant local and national NGOs and civil society organisations.
Local and national government stakeholders; National parks (Shar Planina and Mavrovo), JSC Water Economy in Ohrid and Kavadarci, public service providers	Meetings with local and national authorities, public services/infrastructure service providers  The purpose of these meetings is to keep all the relevant entities informed about all project activities to ensure that they are aligned with all local and national development plans. The goal of these meetings is to provide the local stakeholders with uninterrupted access to all the services, including the operation of irrigation systems and infrastructure during rehabilitation works.	ESM and Contractor	Quarterly throughout the pre-construction, during rehabilitation works and during the operational phase	Communication via official correspondence, via e-mail and/or phone.	ESM will continuously monitor the proposed COVID-19 prevention measures and will organise meetings accordingly. If public consultation meetings would not be allowed during the rehabilitation phase, alternative approaches will include online meetings and phone communication with the relevant organisations.

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to COVID-19
	Meeting minutes shall be prepared and disseminated among the relevant stakeholders.				
NGOs and civil society organisations	Meetings with NGOs and civil society organisations NGOs and civil society organisations will be consulted continuously, whereby they will be invited to meetings with the local communities, while additional targeted meetings will be organised with these stakeholders at least once per year during the rehabilitation phase. Meeting minutes will be prepared and disseminated among the relevant stakeholders.	ESM and Contractor	Annually during rehabilitation	Official invitations to meetings via e-mail and announcements in the local media.	ESM will continuously monitor the proposed COVID-19 prevention measures and will organise the meetings accordingly. If public consultation meetings would not be allowed during the rehabilitation phase, alternative approaches will include online meetings and phone communication with the relevant local and national NGOs and civil society organisations.
The media	Regular briefing about project activities and project updates ESM shall regularly provide information to the local and national media about the relevant project updates so that all the stakeholders are duly and timely informed about all project activities. ESM and the contractor will provide the local media with all the relevant project updates.	ESM and Contractor	Continuously throughout the rehabilitation phase	Dissemination of information via e-mail, official letters, and/or phone communication.	No alternative approach is required for this activity since communication is going to be carried out via e-mail, post and/or phone, thus it does not require direct contact with the stakeholders.

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to COVID-19
Operation phas	se (2023)				
All local stakeholders	Public consultation meeting regarding project closure and project feedback  A final meeting will be organised with all local stakeholders during the project close-out phase in order to inform them about the finalisation of rehabilitation works and the plans for the future operation of the rehabilitated HPPs. In addition, this meeting will aim to get feedback regarding the rehabilitated HPPs and addressing any potential outstanding questions.	ESM, Project affected municipalities	After completion of the rehabilitation phase	Information about the location and time of public consultation meeting will be posted at ESM website and also at the websites of all project affected municipalities` and will also be disseminated via announcements in the local media (e.g., radio, newspaper). In addition, information notes will be placed on bulletin boards of the local communities.	ESM will continuously monitor the proposed COVID-19 prevention measures and will organise the meetings accordingly. If public consultation meetings are not allowed during the operation phase, alternative approach shall include online meetings and phone communication with the relevant stakeholders.
Local and national media	Public announcements Public announcements about the completion of works and operation of the rehabilitated HPPs will be communicated by the contractor and ESM through the local and national media (i.e., radio, TV, newspaper, online portals, etc.)	ESM and Contractor	After putting the rehabilitated HPPs into operation	Information about the completion of works and operation of the rehabilitated HPPs should be disseminated to all the stakeholders.	No alternative approach is required for this activity since communication is going to be carried out via the local and national media, thus it does not require direct contact with the stakeholders.

#### 6.1 Proposed Strategy and Information Disclosure

The Public disclosure package for the rehabilitation Project will contain the following parts:

- The results of the prepared Environmental and Social Site Risk Assessment (ESSRA) with the SEP shell
  be presented within a concise Report. ESSRA will focus on the site-specific impacts and risk
  assessment and proposed respective mitigation measures.
- A non-technical Summary as a short account of the project will provide a description of the preparation of ESSRA and its findings.
- A project Grievance Redress Mechanism is a non-legal process established for stakeholders to express
  concerns or comments they have about the project and find optimal ways to resolve disputes. It is
  about providing redress and remedy to any party that has suffered negative impacts from the project
  implementation.

ESM-PIU will use appropriate methods to disclose information about the Project, consult with stakeholders on potential benefits and risks of the planned activities and potential adverse impact mitigation measures. Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the project. Information will be disclosed using methods which would be suitable for various groups of stakeholders at all stages of the project implementation.

An elaborated project documentation intelligible for everyone will be made available for the public. The project documentation will be prepared in English and Macedonian language and be available upon their official approval. Project related information for persons with disabilities (mainly blind) will also be made accessible (e.g., as a summary lecture available on the homepage of ESM). Documents will remain disclosed during a period of 30 days. All affected and interested parties can submit comment on the disclosed project documentation for the period of 30 days.

It is important to note that the ESSRA will be subject to a public consultation procedure - the procedure lasts 30 days from the publication of the document until the final collection of comments.

The draft version of the ESSRA should be publicly disclosed on the website of the ESM-PIU and on the websites of the project affected municipalities. After the public hearing and "no objection" by KfW Development Bank a final version should be disclosed.

#### 7 Grievance Redress Mechanism

In compliance with the World Bank's ESS10 requirements, a specific grievance redress mechanism (GRM) will be set-up for the project. Communication materials, in a way that everyone can understand (e.g., GRM pamphlets, posters) will be produced to help local residents familiarize themselves with the grievance redress channels and procedures. A brief GRM manual will also be developed. Suggestion and complaint boxes will also be installed in each project affected municipality at the respective HHP. In order to capture and track grievances received under the project, a dedicated GRM Management Information System (incl. database/ register) is planned. The ESM-PIU website will include clear information on how feedback, questions, comments, concerns, and grievances could electronically be sent to the utility. The website will also provide information on the way the GRM committee works, both in terms of processes and timing and deadlines.

The PIU within ESM will provide a GRM to ensure that the company will respond to any concerns and complaints particularly from affected stakeholders and communities.

The GRM will also be one of the tools for monitoring the impacts of the project implementation process. It will be easily accessible, transparent, and accountable in handling grievances, and responsive in sense of addressing the grievances reported by the affected persons and groups both in an efficient and effective manner. The GRM of the project aims to receive, resolve, and follow the concerns and complaints of the project affected communities from all concerned levels (regional, municipalities, settlements).

The following principles will apply to the grievance management:

- any grievance related to the project will be registered, acknowledged within five working days, and tracked until it is closed
- the grievance management system will include at least one level of review/appeal, with the aim to reach an amicable settlement of issues wherever possible without resorting to a judicial review
- grievances will be processed and responded to within 15 working days.

Apart from this mechanism every affected person or group has the right to legal recourse and must also be supported in doing so.

From the very beginning of this project, ESM and PIU pay much attention to the information, consultation, and cooperation with the stakeholders. ESM and PIU are truly committed to receiving and responding to all comments or complains, either verbally or in writing in relation to the project and recognizes that consultation is an ongoing process and different concerns may arise as the project moves into the next phases.

The GRM will be managed and implemented by the PIU. PIU will provide a fully operational GRM during the pre-construction, construction, and post-construction phase. The latter includes all tests and trials for the final operation of the HPPs and their entire technical systems.

A prepared form already used elsewhere is provided in the attachment. The grievance form (in Macedonian and English language) is going to be available on the official websites of the PIU and the project affected municipalities. The project affected municipalities will have available hard copies of the grievance forms so that the public may have direct access to them.

A worker's GRM will also be established for the employees of the construction companies (as a separate system). Additionally, during the rehabilitation phase, the grievance forms are going to be provided at the entrance of the HPP's as hard copies. The contractor will be obliged to set up the corresponding grievance box and signs on the construction site.

Apart from information provided by mass media the interested and/or affected stakeholders will duly be informed about the availability of the grievance mechanism in the way that the PIU will put up announcements on each HPP information board. These announcements are providing all the relevant information necessary for submission of grievances, i.e., contact information, the deadlines, etc.

The grievances may be submitted anonymously, or they may be signed. In the latter case the complainants should provide all relevant contact information if they want to be contacted subsequently. All comments and complaints will be forwarded and processed by the responsible person of the PIU services as shown in the next table.

*Table 7:* Grievance mechanism contact information

JSC Elektrani of North Macedonia (ESM) – Skopje The Republic of North Macedonia
Project Implementation Unit (PIU) Web:
Contact person for Grievance mechanism
(Responsible person in PIU)
Phone: +389
E-mail:

Comments and complaints on the project, can also be submitted to the responsible contact persons to be appointed within the project affected municipality administrations. Contact details of the contractor's project office will also be publicly available. In addition to this document, the main formal bases for submission of comments and complaints directly or indirectly relating to the project will also be established.

The PIU will be responsible for managing the grievance process in a way that within 5 days they inform the complainants about the receipt of the grievance. This will be done formally, either via e-mail, post, or phone (depending on the contact information provided).

The PIU then will have a deadline of 15 days for providing an official response to the grievance by informing the complainant about the intended corrective action and/or reason for rejection of the complaint and/or the proposals. ESM will register all complaints and monitor the entire process of comments and complaints. The company will provide information about the complaints and their processing and the results within the frame of regular (for instance quarterly) reports which will be posted on its website. The grievance procedure is shown in the following figure:

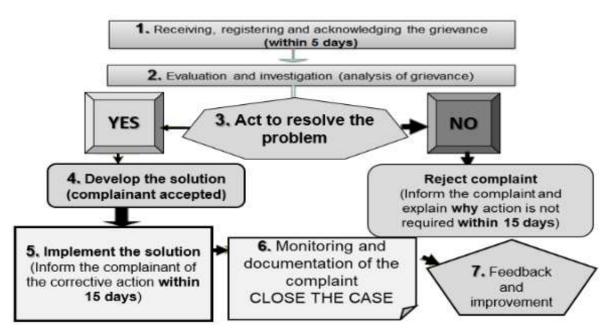


Figure 7: Grievance procedure

If the PIU is not able to address the issue/s raised by affected stakeholders immediately by corrective action, and the suggestions and/or demands appear realistic, a long-term corrective action plan will be elaborated. The complainant will be informed with regard to the proposed corrective measure. After 30 days the complainants again will be informed of the measures that in the meantime have been taken or at least initiated.

In situations where the PIU is not able to address the particular issue raised through the GRM or if action is not required or measures cannot be carried out it will provide a detailed explanation/justification why the problem could not be solved. The response will also contain an explanation on how the person/organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory for him or her. At all times, complainants may seek other legal remedies in accordance with the legal framework of the Republic of North Macedonia, including formal judicial appeal.

For the workers, who will be engaged for the implementation of the project activities, a separate GRM will be available.

All comments and complaints regarding the environmental impact and the social environment will be incorporated within a complaint report. PIU will establish a registry of grievances and will monitor the implementation of the solutions approved in the context of the of grievances. The grievance registry should specify the following information:

- description of grievance
- date of receipt, acknowledgement returned to the complainant
- description of actions taken (investigation, corrective measures); and
- date of resolution and closure / provision of feedback to the complainant.

Template for the grievance log may be found in the attachment. Summaries of complaints and the measures taken to resolve them will be made public on a regular basis on the ESM website.

### 8 Monitoring and Reporting

Monitoring and reporting (M+R) represent crucial steps within a successful implementation and management process of any successful stakeholder engagement plan. M+R activities need to be carried out in order to ensure full compliance with all stakeholders' expectations and requirements, which not insignificantly contributes to a successful implementation of the project. ESM should commission an external consultant for M&R in order to ensure neutrality.

The result of the stakeholder engagement process will be included in the Monitoring Reports to be prepared by the PIU. The first report will be produced three months after the beginning of the Project and reporting will continue on a quarterly basis during construction works and on an annual basis during operation. The reports will include the following information:

- the places and time of consultation meetings held and other types of engagement activities (with information on the number and types of participants)
- issues and concerns raised during consultation meetings and information on how the issues raised were taken into consideration by the project team
- number and types of grievances raised in the reporting period with indication of opened, resolved and closed grievances and whether they have been processed exhaustively within the timeframes provided by the grievance mechanism (see Chapter 7).

In addition, the PIU will submit "Annual Environmental and Social Reports" to the Lender summarizing environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance redress mechanism.

The PIU will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to the Lender.

ESM will monitor the development of the intended stakeholder participation within the elaborated engagement schedule. Through evaluation of outcomes and effect of engagement ESM intends to obtain regular feedback from stakeholders and to learn if the planned outcomes are achieved or if there is a need for changing the approach. ESM will provide annual reports, which will include a summary of the Project's performance on the management of health, safety, environment, and social issues.

Throughout the Project, ESM will communicate with stakeholders and inform them of any significant issues, for example, changes in the project programme deadlines. All stakeholder engagement activities will be documented in the Stakeholder Engagement Register with attached copies of the minutes to preserve all records and documented confirmation of public consultations held and engagement measures implemented.

This SEP is going to be provided to the contractor prior to commencement of construction, whereby they are going to be obliged, as part of the procurement documentation, to comply with the provisions of this SEP and implement all the measures accordingly.

In addition, implementation of the SEP by the contractor is going to be monitored by the investor on a monthly basis. The contractor will employ a person who is going to be responsible for managing environmental and social aspects of the project. This would be the manager for Environmental and Social Issues, who will monitor the implementation of all environmental and social plans. He or she will subsequently report to the investor on a monthly basis, providing ESM with all relevant inputs and updates regarding the implementation of this SEP and other environmental and social documentation accordingly. Finally, the monthly reports are going to be used by the investor in order to prepare regular reports to KfW as the financing institution.

A responsibility matrix is provided in the next table.

Table 8: Monitoring and Reporting Responsibility Matrix

Entity	Responsibility	Activity	Frequency
ESM	Monitoring implementation of SEP by the selected contractor. This activity is going to be carried out through regular communication with the contractor.	Revising monthly reports provided by the contractor.	Monthly
	Reporting to KfW as the financing institution about implementation of activities and processes defined in this SEP-	Reporting to KfW.	As per schedule defined by KfW
Contractor	Implementation of activities and processes related to stakeholder engagement, as defined in SEP.	Duly and timely implementation of all the proposed stakeholder engagement activities and corresponding measures.	Regular monthly reports to the investor, with addition of reports about any unexpected and/or unplanned issues that may arise.
	Reporting to ESM about implementation of SEP and any potential arising issues.	Preparation of regular monthly reports about the stakeholder engagement processes and implementation of SEP.	Monthly
	Reporting about the grievances submitted via the grievance box on HPP's entrance.	Providing the Investor with hard copies and/or scanned versions of the grievances submitted via the grievance box on site. The Contractor shall check the grievance box on a daily basis.	Regularly, as soon as the grievances are received.

## 9 Implementation Arrangements for Stakeholders Engagement

Stakeholder engagement arrangements will be shared among the ESM / PIU and the future contractor, whereby the contractor shall be responsible for full and duly implementation of all the activities and processes stipulated in this SEP, while ESM shall bear the responsibility related to monitoring of implementation of SEP.

The contractor shall be obliged to implement all activities in due course, whereby they shall be responsible for hiring and Environmental and Social Manager who is going to be responsible for communication with all the identified stakeholders, organization, and implementation of the planned activities, as well as reporting to the Investor. The Contractor shall report to the Investor regularly, in the form of monthly SEP status reports, whereby the investor shall provide their relevant feedback and define any outstanding courses of action. A more detailed overview of the monitoring and reporting responsibilities is provided in chapter related to the Monitoring and Reporting of the SEP.

## 10 References

ESM (2021) Study for Revitalization of Large Hydropower Plants (LHPP) Phase III, Owned by JSC ESM, Skopje.

IFC/WB (2007) Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, Washington.

IFC/WB (2012) IFC Performance Standards on Environmental and Social Sustainability, Washington.

KfW Development Bank (2022) Sustainability Guideline Assessment and management of Environmental, Social, and Climate Aspects: Principles and Procedures, Frankfurt am Main.

World Bank (2017) The World Bank Environmental and Social Framework, Washington.

## 11 Appendices

## 11.1 Appendix 1: Public Grievance Form

Data lodged:	GRIEVANCE FORM
Remarks:	
Preferred language for communication:	
Information about the person submitting	If you do not want to provide the information from 1-3, simply
the grievance:	move on to the subject and explanation of the grievance
1. Name / Surname:	
2. Date, place, and manner of receipt:	
3. E-mail and other contact data:	
4. Scope of the grievance:	
5. Detailed explanation of the grievance:	
6. Detailed information:	
7. Manner of responding to your	Please specify how you would like to be informed about the
grievance: Date:	further course of the Project: For instance:
Date.	I will submit the complain about the noise caused by usage of
	mechanization. I will describe the period and levels of noises, some information about the transport, etc.
Remarks:	In the item 6 I will give my argumentation about the complain
	Based on the law, or based on mu information it is unacceptable that level
8.Processing of the grievance	
9. Administrative records:	
10. Reviewed (date, responsible party/person):	
11. Answered (date, responsible party/person, and archive number):	

## 11.2 Appendix 2: Grievance Log Template

		Grieva	nce resolutio	n		
ld.	Name Surname / Contact details of person that reported grievance	Date received	Details of complaint/comment	Responsibility	Actions taken	Date resolved

#### Appendix 3: Photo Log 11.3

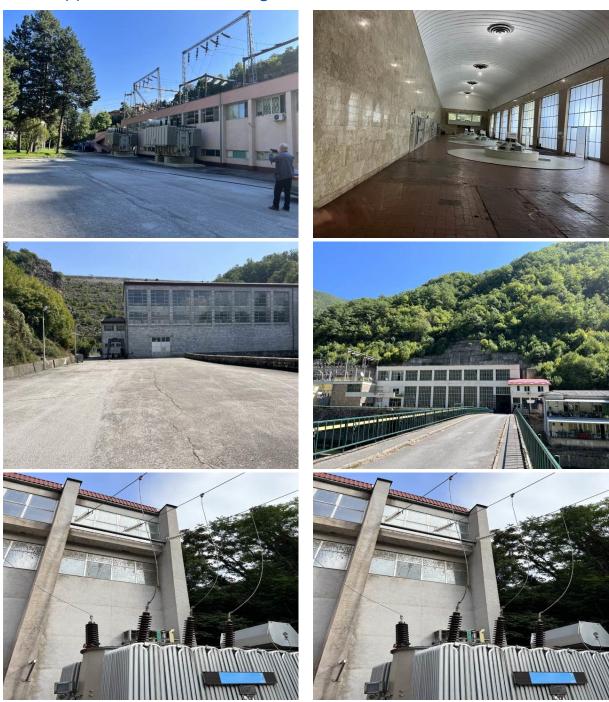


Figure 8: Rehabilitation activities of existing facilities in HPP Vrutok, HPP Raven, HPP Spilje, HPP Globochica and HPP Tikvesh \*

<sup>\*</sup> These photographs were taken by the Fichner/Geing team during the site visit (06 - 16.09.2022) of the 6 HPPs

## 11.4 Appendix 4: Key findings from the site visit of social experts (05.9.2022 - 09.9.2022 for the project "Renewable Energy Programme ESM Component 1: Rehabilitation of six Hydropower Plants)"

Date	Institution / Location	Involved Parties / Attendees	Notes
05.09.2022	Kick off meeting in the premises of ESM in City of Skopje	ESM team:  Nevenka Jakimova Filipovska - Deputy Coordinator (Electricity Production Department);  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	At the beginning of the meeting, the members of the project teams were introduced and the type of project activities for the rehabilitation of 6 HPPs for III phase was discussed.  ESM Deputy Coordinator provided team with overall information about the Project, project locations, rehabilitation of each HPP. They informed the consultants that the project activities related to the electrification of water intakes in the system "Sharski Vodi" is excluded.  It was also discussed about the necessary documentation that should be submitted by the GEING and Fichtner social team to ESM:  ESRRA;  Stakeholder Engagement Plan for the Project;  Commitment Plan and ESMP.  ESM Deputy Coordinator provided team with the contacts details of the HPP's management.  After the meeting, the project teams conducted site visit of the project affected municipalities, Subsidiary branch offices of Water Economy (Ministry of Agriculture, Forestry and Water Economy) and relevant project locations of HPPs.

#### Photo documentation \*







Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
05.09.2022	The meeting with PINP Shar Planina was held in the premises of the State University in Tetovo.	PINP Shar Planina:  Ibrahim Dehari - Director; Anela Stavrevska Panajotova – Head of the Department for Nature; Responsible Person for IT department in PINP Shar Planina.  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation. The NP Shar Planina team expressed their concerns related to the level of the water mainly in the Sharski Vodi system. They also mentioned the possible concerns and reactions of the local inhabitants related to the irrigation of the agricultural land in the region. They underlined that the local people use the water for irrigation from the constructed irrigation channel.  The representatives of the national park pointed out that they found that the recommendations regarding the biological minimum are not being followed.  They noted that it is important to protect the nature, to protect the rich water sources of Shar	
			Planina.	HAPPY

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
05.09.2022	The meeting was held in the premises of the municipality of Gostivar.	The Municipality of Gostivar:  D-r Arben Taravari – The Mayor of the Municipality of Gostivar;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts provided the mayor a summary presentation of the scheduled rehabilitation activities.  The mayor of the municipality expressed the preparedness to support the planned project.  He suggested informative public meetings to be hold two or three months before the start of the rehabilitation activities.  He mentioned that they have a positive opinion about the proposed project, and they mean that it will be good to implement it.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
05.09.2022	The meeting was held in the premises of ESM in Gostivar.	Ejup Bekiri - Technical Manager; Zoran Ilievski – Head of Production Department;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	At the meeting the structure of HPS Mavrovo was discussed, which contains three HPPs and one accumulation: HPP Vrutok, HPP Raven, HPP Vrben and Mavrovo dam. The intake system of HPS Mavrovo is called Sharski Vodi, which contains total 13 intakes.  After the meeting, the social experts with head of the Production Department had conducted site visit of HPP Vrutok and HPP Raven.  The Technical Manager Bekiri provided the social experts with necessary maps, KMZ file for Sharski dovod, and documents related to the HPS Mavrovo.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
05.09.2022	Site visit with Zoran Ilievski, head of Production Department on HPPs Vrutok and Raven.	HPP Vrutok and HPP Raven: Zoran Ilievski – Head of Production Department;  GEING team: Ruzhica Cacanoska – Social Expert; Fichtner team: Frank Bliss - International Social Expert;	Social experts with head of Production Department of HPS Mavrovo conducted site visit in HPP Vrutok and HPP Raven. The head of the Production Department obtained the social experts with comprehensive explanations and information related to the location and construction of both HPPs, including the necessary facts related to the process of generating electric power. Also, he explained in detail the need for rehabilitation of the segments of the equipment of HPP Vrutok and HPP Raven.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
06.09.2022	The meeting was held in the premises of the municipality of Mavrovo and Rostuše.	The Municipality of Mavrovo and Rostuše:  Osman Sejdiu – The General Secretary of the Municipality of Mavrovo and Rostuše;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:	Social experts provided the municipality official a summary presentation of the scheduled rehabilitation activities.  The secretary of the municipality expressed the preparedness to support the planned rehabilitation activities.  He suggested the ESM to inform them in time about the start of rehabilitation activities.  He stated their positive opinion about the proposed project and that they will support its implementation.	
		Frank Bliss - International Social Expert;		

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
6.09.2022	The meeting was held in the premises of the NP Mavrovo in the settlement Mavrovi Anovi.	PINP NP Mavrovo team:  Samir Ajdini - Director of the NP Mavrovo; Tomo Gjorgjievski – Head of department of protection; Zafket Veapi – Head of department of sustainable use;	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation. The NP Mavrovo team expressed their concerns related to the protection of the nature. They noted that it will be good to have the information about the start of the project activities.  The HPPs are located in the protected zone, and	
		Ikmet Ejupi - Protection and control officer; Hamlet Ahmedi;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:	it is necessary to follow the set of requirements related to the protected zones.  They informed the social experts about the key points of their work. They noted that the social responsibility of ESM was on low level, and they expect ESM to participate actively in the future protection initiatives and activities in NP Mavrovo.  They also mentioned the possible concerns	
		Frank Bliss - International Social Expert;	related to the transport of materials and electro parts and the need to prevent the possible traffic jam. They informed the social experts about the distance between the school, the church, the tourist of the informative center, etc. and the regional road R2235 (connection with R1202).	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
06.09.2022	Site visit of HPP Špilje with responsible person for the day shift.	HPP Špilje:  Responsible person for the day shift;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts with responsible person for the day shift of HPP Špilje, conducted site visit. Hydropower plant employee explained in detail the construction of the HPP and the equipment. Also, he explained in detail the need for rehabilitation of the old parts of the equipment of HPP Špilje.  The workplaces for rehabilitation works were shown. Gligor Jauleski - Head of Electro-Mechanical Maintenance of Špilje and Globočica, informed the social experts that for the transport of materials and electro parts will be used the regional road R1201 and local road constructed in the same period when was constructed HPP Špilje. In general, the local network in this area was in good condition.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
06.09.2022	The meeting was held in the premises of the municipality of Debar.	The Municipality of Debar:  D-r Hekuran Duka – The Mayor of the Municipality of Debar;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts provided the mayor a summary presentation of the scheduled rehabilitation activities.  The mayor of the municipality expressed the preparedness to support the planned project.  He informed the social experts that the social responsibility of ESM was on low level. He underlined the importance of:  Providing a minimum ecological flow;  Fish protection, fish passes,  Participation in the local activistes related to provision of the dring water, etc.  He noted that the irrigation system in Debar area is out of usage.  He mentioned that they have a positive opinion about the proposed project, and they mean that it will be good to implement it.  For transportation of the necessary electro parts and materials will be used the regional roads R1202 and R1201.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
07.09.2022	Site visit of HPP Globočica and Globočica dam.	Saso Korkut - Director; Gligor Jauleski - Head of Electro-Mechanical Maintenance;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts with Gligor Jauleski conducted site visit on the HPP Globočica.  Gligor Jauleski explained in detail the phase of construction of the HPP Globočica and some specifics of the equipment.  Also, he explained in detail the need of replacement of synchronous generators A&B, reconstruction of wicket gates for Francis turbine TF 1.65/213-13 of units 1 and 2, replacement of hydromechanical and electrical equipment and reconstruction of grout curtain of the dam Globočica.  HPP Globočica and Globočica dam are connected with the regional road R1201. The transport of electrical parts and materials will be carried out through this regional road, which is in good condition.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
07.09.2022	The meeting was held in the premises of JSC Water Economy Crni Drim, in Ohrid.	Ministry of Agriculture, Forestry and Water Economy JSC Water Economy Branch Office Crni Drim – Ohrid  Valentina Trajceska - Irrigation Engineer; Milovan Kalanovski - Irrigation Engineer; Daniel Nikolovski – Water carrier;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts informed the participants of the meeting about the project and discussed their expectations related to the project implementation.  The JSC employee explained that less than 1% of the water of the river Crni Drim is used for irrigation.  They noted that their company is responsible for the maintenance of the riverbed of Crni Drim. They did not express any concerns about the project implementation.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
07.09.2022	The meeting was held in the premises of the	The Municipality of Struga:	Social experts provided the attendees a summary presentation of the scheduled rehabilitation activities.	
	municipality of Struga.	Ramiz Merko – The Mayor of the Municipality of Struga; Saso Korkut – Director of Branch office of ESM in	The mayor of the municipality explained their cooperation with ESM and expressed the preparedness to support the planned project.	
		Struga; An employee from the municipality of Struga;	The mayor expressed his support for the project implementation.	
		GEING team:	The director of Branch office of ESM in Struga gave additional explanations related to the rehabilitation project and underlined that they	1857
		Ruzhica Cacanoska – Social Expert;	have good cooperation with the municipality of Struga.	
		Fichtner team:	The mayor of the municipality of Struga noted that the municipality in cooperation with ESM	
		Frank Bliss - International Social Expert;	would like to clean the riverbed of Crni Drim from Struga to the Dam Globočica.	

1)210	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
09.09.2022		Attendees  HPP Tikveš:  Trajche Tefov – Technical Manager Gjoko Tashev – Manager at HPP "Tikvesh", Leader of team in: ISO 9001, ISO 14001, and ISO 45001;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts with HPP Tikveš team conducted site visit on the HPP Tikveš.  Social experts were obtained with the set of key information about the HPP Tikvesh and Tikvesh dam. The workplace for rehabilitation and Tikveš dam were shown. HPP Tikveš is at a distance more than 3.5 km from the center of the settlement Vozarci. The local roads that will be used for the delivery of materials and electro parts to HPP Tikveš pass through the settlement Vozarci.  The social experts were interested in the capacity of the bridge over the river Crna Reka located in the project affected settlement Vozarci. The management of HPP Tikveš promised to obtain the experts with the necessary information about the load capacity of the bridge in Vozarci.	Photo documentation *

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
09.09.2022	The meeting was held in the premises of the municipality of Kavadarci.	The Municipality of Kavadarci:  D-r Mitko Jančev – The Mayor of the Municipality of Kavadarci; Todor Efremov – General Secretary of the municipality of Kavadarci;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International	Social experts provided the mayor and secretary a summary presentation of the scheduled rehabilitation activities with the accent on the rehabilitation activities related to the HPP Tikvesh.  The mayor of the municipality expressed the preparedness to support the planned project.  However, he noted that the inhabitants of the project affected settlement Vozarci may have some requirements to the ESM.  The municipality of Kavadarci has no benefits from the location and work of HPP Tikveš in their municipality due to the fact the budget of the company manages from the Headquarter in Skopje.	
		Social Expert;	In general, they will support the implementation f the project for rehabilitation of the HPP Tikvesh but there Is the need to increase the level of cooperation between the municipality and ESM, especially HPP Tikveš.  He mentioned that they have a positive opinion about the proposed project, and they believe that it will be good to implement it.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
09.09.2022	The meeting was held in the premises of JSC Water Economy Tikveš in Kavadarci.	Ministry of Agriculture, Forestry and Water Economy JSC Water Economy Branch Office Tikveš – Kavadarci: Vlatko Nacev - Director; Cvetanka Nastova – Head of the Finance Department;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts provided the deputy director of JSC Tikveš a summary presentation of the scheduled rehabilitation activities with the accent on the rehabilitation activities related to the HPP Tikvesh.  The representative of JSC Tikveš explained that drinking water should be provided first, then water for irrigation is provided, and after that water is used to produce electricity.  The JSC Water Economy Tikveš use the water for irrigation in the period from April 15 to October 15. They have 10,000 ha for irrigation.  The JSC deputy director noted that in 2020 and 2021 there was the situation that no water was available for irrigation during the period for which JSC had the license for using water from the Tikveš Lake. They had the conflict with ESM in 2020/2021 and they are trying to solve the problem through the court.	

Date	Institution / Location	Involved Parties / Attendees	Notes
09.09.2022	The meeting was held in the premises of local NGO sector in Kavadarci.	NGO Eco Life:  Robert Parizov – President of the NGO;  GEING team:  Ruzhica Cacanoska – Social Expert;  Fichtner team:  Frank Bliss - International Social Expert;	Social experts provided the president of the NGO Eco life a summary presentation of the scheduled rehabilitation activities with the accent on the rehabilitation activities related to the HPP Tikvesh.  The president of Eco life claimed that ESM is not a good protector of nature. He mentioned that there is no sustainable use of water by ESM. During the winter period ESM exploits the Tikvesh lake on maximum. Tikvesh is a protected area, but there is no manager. About 2,500 weekend houses have been built on Tikveš Lake without building permits. A significant portion of the owners of weekend houses have started the process of legalization of their illegal constructed houses. There is no sewage system in that area.  The inhabitants and ecologists are revolted by the way of usage of the water by ESM. Parizov emphasized that ESM's water permit will expire very soon, and they believe that they will prepare an appropriate legal strategy for better nature protection. They have monitored the usage of water for production of electricity and noted that ESM didn't follow the requirements in this sphere.  Parizov expressed his support for the project
			very soon, and they believe that they will prepare an appropriate legal strategy for better nature protection. They have monitored the usage of water for production of electricity and noted that ESM didn't follow the requirements in this sphere.

<sup>\*</sup> These photographs were taken by the Fichner/Geing team during the site visit (06 - 16.09.2022) of the 6 HPPs

#### Photo documentation \*





implementation.

# 11.5 Key findings from the site visit performed by Technical Expert Team (12.9.2022 - 16.9.2022 for the project "Renewable Energy Programme ESM Component 1: Rehabilitation of six Hydropower Plants)"

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Date	Institution / Location	Involved Parties / Attendees	Notes	
12.09.2022	Kick off meeting in the premises of ESM in City of Skopje	ESM team: Darko Mickoski - Coordinator (Electricity Production Department); Nevenka Jakimova Filipovska - Deputy Coordinator (Electricity Production Department); Julija Siljanovska - Environmental Engineer;  GEING team: Tanja Nikolovska - EIA Expert; Zdravko Andonov - Energy Expert; Jelena Sekulovska - Biodiversity Expert;  Fichtner team: Otar Gavasheli - International HPP Expert; Armen Bodoyan - International Environmental Expert;	At the beginning of the meeting, all members of the project teams were introduced and the type of project activities for the rehabilitation of 6 HPPs for III phase was discussed. It was also discussed about the necessary documentation that should be submitted by the ESM team to the GEING and Fichtner teams:  Water permits for relevant HPPs; Presence of PCBs in the transformer oils and their analysis/monitoring; Contracts with licensed subjects for waste management and treatment; Certificates for ISO 14001 and ISO 45001 and relevant ISO documentation (procedures, manuals, formulars, etc.) for environmental and OH&S management; Environmental and OH&S policy; Presence of ACM (asbestos containing material) in HPPs equipment; Water quality monitoring of HPPs (before the intake and at the dam/accumulation); Providing a minimum ecological flow; Regime of operation of relevant HPPs; Fish protection, fish passes, etc.  After the meeting, the project teams conducted site visit of the relevant project locations of HPPs.	

#### Photo documentation \*









Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
	HPS (hydropower system) Mavrovo, subsidiary of ESM, located in City of Gostivar/site visit of total 7 intakes: Proshevce, Kuchibapska river, Vraca 1,	Ejup Bekiri - Technical Manager; Tomce Janevski - Head of Civil Department; Zoran Ilievski – Head of Production Department; Zoran Angelov - mechanical maintenance engineer;	At the meeting the structure of HPS Mavrovo was discussed, which contains three HPPs and one accumulation: HPP Vrutok, HPP Raven, HPP Vrben and Mavrovo dam. The intake system of HPS Mavrovo is called Sharski vodi, which contains total 13 intakes. After the meeting, the project teams had conducted site visit of total 7 intakes: Prosevce, Kucibapska river, Vraca 1, Vraca 2, Mazdracha, Dumkovo and Lomnica.	
	Vraca 2, Mazdracha, Dumkovo and Lomnica	Ruzica Milosheska Brchioska – electro engineer; Petar Jovanovski – responsible for OH&S issues; Gazmend ?  GEING team: Tanja Nikolovska - EIA Expert;		
		Zdravko Andonov - Energy Expert; Jelena Sekulovska - Biodiversity Expert;  Fichtner team: Otar Gavasheli - International HPP Expert; Armen Bodoyan - International		

Environmental Expert;

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
13.09.2022	HPP Raven, HPP Vrutok, HPP Vrben, intake of Vrutochka river, transmission line (towers near village Rechane and NP Mavrovo) and Mavrovo dam	HPS Mavrovo team:  Ejup Bekiri - Technical Manager; Tomche Janevski - Head of Civil Department; Zoran Ilievski - Head of Production Department; Ruzica Milosheska Brchioska - electro engineer;  GEING Team: Tanja Nikolovska - EIA Expert; Zdravko Andonov - Energy Expert; Jelena Sekulovska - Biodiversity Expert;  Fichtner team: Otar Gavasheli - International HPP Expert; Armen Bodoyan - International Environmental Expert;	A site visit was conducted at: HPP Raven, HPP Vrutok, HPP Vrben, intake of Vrutochka river, transmission line (towers near village Rechane and NP Mavrovo) and Mavrovo dam.  During the side visit, the following was considered: transmission line (35 kV) where project activities will be performed, intakes, manholes, nearest settlements, identification of the surrounding biodiversity, visit of the body of the Mavrovo dam, etc.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
14.09.2022	Premises of NP Mavrovo/Intake Stirovica	NP Mavrovo team: Tomo Gjorgjievski – Head of department of protection; Zafket Veapi – Head of department of sustainable use; Ikmet Ejupi - Protection and control officer;  HPS Mavrovo team: Tomche Janevski - Head of Civil Department; Zoran Ilievski – Head of Production Department; Gazmend Fetahi – Manager of HPP Raven  GEING Team: Tanja Nikolovska - EIA	At the meeting with the representatives from NP Mavrovo the type of project activities and their duration was discussed. Also, following issues were considered:  Zoning of NP Mavrovo; Adoption of Management Plan of NP Mavrovo; Current status of lynx population; Introduction of young deer population near the project location (near the transmission line in NP Mavrovo);  Generation of transformer oils from project activities (presence of PCBs); Presence of ACM (asbestos containing material) in HPPs equipment; Water quality monitoring of HPPs (before the intake and at the dam/accumulation); Providing a minimum ecological flow; Fish protection, fish passes, etc.	
		Expert; Zdravko Andonov - Energy Expert; Jelena Sekulovska - Biodiversity Expert;  Fichtner team: Otar Gavasheli - International HPP Expert; Armen Bodoyan - International Environmental Expert;	After the meeting, the project teams conducted site visit of Intake Stirovica.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
15.09.2022	HPS Crn Drin - HPP Spilje, Debar/HPP Globocicha, Struga	HPS Crn Drin team: Gligor Jauleski - Head of Electro-Mechanical Maintenance; Marijan Glavicevski — responsible for ISO 14001 for HPP Spilje and HPP Globocicha; Slavko Milevski — Safety Manager; Zoran Manojlovic — responsible for environmental issues in HPP Spilje.  GEING Team: Tanja Nikolovska - EIA Expert; Zdravko Andonov - Energy Expert; Jelena Sekulovska - Biodiversity Expert;  Fichtner team: Otar Gavasheli - International HPP Expert; Armen Bodoyan - International Environmental Expert;	At the meeting, the type of project activities for HPP Spilje and HPP Globocicha was discussed Also, following issues were considered:  Contracts with licensed subjects for waste management and treatment;  Certificates for ISO 14001 and ISO 45001 and relevant ISO documentation (procedures, manuals, formulars, etc.) for environmental and OH&S management;  Environmental and OH&S policy;  Generation of transformer oils from project activities (presence of PCBs);  Presence of ACM (asbestos containing material) in HPPs equipment;  Water quality monitoring of HPPs (before the intake and at the dam/accumulation);  Providing a minimum ecological flow;  Fish protection, fish passes, etc.  After the meeting, the project teams conducted site visit at HPP Spilje where following was considered: technical characteristics of each HPP, warehouse facilities, nearest settlements, identification of the surrounding biodiversity, etc.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
16.09.2022	HPP Tikvesh and Tikvesh dam, Kavadarci	HPP Tikvesh team: Trajche Tefov – Technical Manager Gjoko Tashev – Manager at HPP "Tikvesh", Leader of team in: ISO 9001, ISO 14001 and ISO 45001.  GEING Team: Tanja Nikolovska - EIA Expert; Zdravko Andonov - Energy Expert; Jelena Sekulovska - Biodiversity Expert;  Fichtner team:	At the meeting, the type of project activities for HPP Tikvesh was discussed. Also, following issues were considered:  Certificates for ISO 14001 and ISO 45001 and relevant ISO documentation (procedures, manuals, formulars, etc.) for environmental and OH&S management;  Environmental and OH&S policy;  Water quality monitoring of HPPs (before the intake and at the dam/accumulation);  Providing a minimum ecological flow;  Fish protection and fish passes;  Presence of protected area – Strict Nature Reserve "Tikvesh";  Usage of ecosystem services (fishing, etc.);  Conducting meeting with relevant stakeholders (NGOs, relevant ministries and municipalities, etc.), etc.	INDUSTRIAL PROPERTY OF THE PARTY OF THE PART
		Otar Gavasheli - International HPP Expert; Armen Bodoyan - International Environmental Expert;	After the meeting, the project teams conducted site visit at HPP Tikvesh, where following was considered: technical characteristics of HPP, warehouse facilities, nearest settlements, identification of the surrounding biodiversity, etc.	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
	Wrap up meeting in the premises of ESM in City of Skopje	ESM team: Dushko Dimitrovski – Senior Supervising Engineer; Nevenka Jakimova Filipovska - Deputy Coordinator (Electricity Production Department);  GEING Team: Tanja Nikolovska - EIA Expert; Zdravko Andonov - Energy Expert; Jelena Sekulovska - Biodiversity Expert;  Fichtner team: Otar Gavasheli - International HPP Expert; Armen Bodoyan - International Environmental Expert;	<ul> <li>During the wrap up meeting following issues and key findings were summarized:</li> <li>Analysis of presence of ACM in the HPPs equipment;</li> <li>Analysis of presence PCB in transformation oils;</li> <li>Review of procedures (ISO documentation) for incidents in accordance with ISO 14001 and ISO 45001;</li> <li>access to tower of transmission line near the populated area (especially near village Recane);</li> <li>Proximity to populated areas;</li> <li>Providing ecological minimum according the national legislation;</li> <li>Presence of significant flora and fauna within the project sites;</li> <li>Conducting meeting with representatives from NP Sar Planina, etc.</li> <li>After preliminary environmental and social risks assessment from the site visit, the consultant project team will propose appropriate mitigation measures and also will prepare project documentation according to ToR requirements.</li> </ul>	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
25.10.2022	Zoom meeting with representative from NP Shar Mountain	NP Shar Mountain team: Anela Stavrevska - Panajotova  GEING Team: Tanja Nikolovska - EIA Expert;	At the zoom meeting with the representative from NP Shar Planina the following issues were discussed and considered:  Description of the main aim of the project, type of project activities and their duration;  Presentation of the key findings from the conducted site visit of intakes from Sharski vodi	No photos from zoom meeting. The main information on the NP Shar Planina can be found at https://www.moepp.gov.mk/%d0%b4%d0%b0-%d1%98%d0%b0-%d0%b7%d0%b0%d1%87%d1%83%d0%b2%d0%b0%d0%bc%d0%b5-
		Jelena Sekulovska - Biodiversity Expert;  Fichtner team: Melanie Siems – Project Manager Armen Bodoyan - International Environmental Expert;	system by GEING and Fichtner team; Presentation of the zones of NP Shar Planina regarding the locations of the visited intakes by Mrs. Stavreska-Panajotova; Restrictions of implementation of project activities within the zones of NP Shar Planina according to national law of nature protection, especially along intake Mazdraca, which is located within the zone of strict protection; Map presentation with sensitive habitats (wet habitats) within the water intakes, especially along intake Mazdraca, which is located within the zone of strict protection etc. The emphasize of the meeting was one of the main challenges for recently proclaimed NP Shar Planina that need to be solved:  Providing ecological flow or biological minimum of water intakes from Sharski vodi system: Mrs.	%d1%88%d0%b0%d1%80%d0%b0/
			Stavreska-Panajotova pointed out that this is one of the main issues within the NP Shar Planina, that need to be solved in near future, in order to provide: 1) water quantities needed for water supply and irrigation near Polog valley; and 2) water quantities needed for wet habitats	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation *
			along the intake Mazdraca. Also she pointed out that a methodology for determination of ecological flow of water intakes within Sharski vodi system, is in ongoing preparation by NGO "Ekosvest";	
			To establish a mechanism for good cooperation and communication with JSC ESM: This can be achieved through Protocol for cooperation with stakeholders (e.g., PE National Forests of RNM) prepared by ESM, which will specify how and in what way activities related to the maintenance of the existing infrastructure of Sharski Vodi of ESM will be carried out. Ms. Stavreska-Panajotova said that this type of document is existing and has not been yet shared with them; High risk of landslides: She confirmed that nowadays she and her colleagues faced with this type of risk on their regular site visit at NP Shar Mountain;	
			Lack of finances for proper functioning of NP Shar Planina: The NP Shar Mountain receives financial resources mainly from own budget, etc.; Main mitigation measures and recommendations for the project activities relevant for NP Shar Mountain, by Fichtner/GEING expert team will be given in ESMP for rehabilitation of 6 HPPs.	

<sup>\*</sup> These photographs were taken by the Fichner/Geing team during the site visit (06 - 16.09.2022) of the 6 HPPs