



Consulting Services for Feasibility Studies for two Photovoltaic Power Plants
of 60 MW and 100 MW in the region of Bitola
(incl. Solar Measuring Campaign and ESIA)

AD ESM - Skopje

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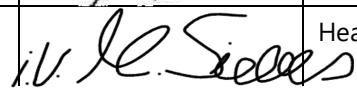


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Abbreviations

AD	Akcionersko Društvo / Joint-Stock Company
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESM	Elektrani Severna Makedonija / Power Plants of North Macedonia
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GRM	Grievance Redress Mechanism
IFC	International Financial Corporation
JSC	Joint-Stock Company
KfW	Kreditanstalt für Wiederaufbau (German Development Bank)
kV	Kilovolt
LRP	Livelihood Restoration Plan
M+R	Monitoring and Reporting
MEPSO JSC	Joint-Stock Company for electricity transmission and power system control, in state ownership, Skopje
MoEPP	Ministry of Environment and Physical Planning
MW	Megawatt
MWp	Megawatt (peak)
NGO	Non-Governmental Organization
NTS	Non-Technical Summary
OIP	Other Interested Parties
PIU	Project Implementation Unit
PVPP	Photovoltaic Power Plant
REK Bitola	Mining power combine Bitola (Mines and Thermal Power Plant - Bitola)
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 construction of two photovoltaic power plants (PVPPs) of 60 MW and 100 MW in the region of Bitola.

The investment will be implemented by the joint-stock company (JSC) Elektrani na Severna Makedonija (AD ESM-Skopje, hereinafter 'ESM'). The beneficiary of the loan will be ESM and REK Bitola. The implementation of this project is a part of the project program "Energy Transition - Renewable Energy Programme North Macedonia".

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

Stakeholder engagement is a process conducted throughout the project lifecycle. Its aim is to support the development of strong, constructive and responsible relationships important for the successful management of a project's environmental and social risks. The early, regular, respectful and clear communication with stakeholders helps to manage stakeholders' expectations and avoid risks, potential conflict, and project delays. In addition, the Stakeholder Engagement 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.

The present SEP not only considers the primary stakeholders who may be affected by the project, but it also aims at including all those stakeholders, such as national government Institutions, NGOs and the concerned municipalities, who may provide support and/or advice wherever needed during the project preparation and the implementation 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 Approval to Construction, Commissioning and through Operation and Decommissioning.

The scope of the SEP shall be/is as outlined in the World Bank's (WB) ESS10¹. The engagement will be/is planned as an integral part of the project's environmental and social assessment and project design and the implementation process.

This SEP will be updated as necessary.

¹ Cf. World Bank (2018): Guidance Note for Borrowers. ESS10: Stakeholder Engagement and Information Disclosure. Washington

2 Project and Project Area Description

2.1 Project Background

In order to support the Government of North Macedonia's energy decarbonization targets by contributing an estimated carbon reduction and increasing the electricity production by renewable sources, AD ESM – Skopje (ESM) plans to establish two photovoltaic power plants (PVPPs) in the region of Bitola, with an installed capacity of 60 MW (Bitola 2) and 100 MW (Bitola 3).

KfW submitted a Letter of Interest for a new program designated "Energy Transition - Renewable Energy Programme North Macedonia", which includes this project (two photovoltaic power plants (PVPPs) of 60 MW and 100 MW in the region of Bitola). The program is approved by the German Government. KfW awards grant funds for the elaboration of feasibility studies for these two photovoltaic power plants, including solar measuring campaign and environmental and social impact assessment (ESIA).

The main objectives of project implementation are as follows:

- reduction of dependency on electricity imports in North Macedonia,
- increase in the utilization of renewable energy sources,
- replacement of electricity produced by fossil fuels and enabling a reduction of greenhouse gas emissions,
- developing opportunities for local short- and long-term employment,
- small but significant incentives for the local economy.

The project includes the construction of two PVPPs (Bitola 2 and Bitola 3). Total installed peak power for PVPP Bitola 2 will be 73.5 MWp. PV panels will be connected to 15 inverters with an output power of 4 MW each. The total output power calculated for PVPP Bitola 2 is 60 MW. The PVPP will have about 183,750 PV panels with 400 Wp power each. The expected yearly electricity production is 112 GWh. It will be connected to a new two-system 110 kV transmission line with a transformer station consisting of two 110/35 kV transformers with installed power of 31.5 MVA each. PVPP Bitola 3 will have 273,000 PV panels with 425 Wp power each. The total calculated peak power is 116 MWp. PV panels will be connected to 25 inverters with output power of 4 MW each. The total output power is calculated as 100 MW. The expected yearly electricity production is 181 GWh. PVPP Bitola 3 will be connected to a new two-system 110 kV transmission line (the same for PVPP Bitola 2) with transformer station consisting of three 110/35 kV transformers with installed power of 50 MVA each.

The project will be categorized with regard to its environmental and social risk in accordance with KfW's Sustainability Guideline (2023) based on the final ESIA results.

The procedure for EIA is regulated in North Macedonia by the Law on Environment (Law on Environment ("Official Gazette of the 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, 129/15, 192/16, 139/16, 99/18 and 89/22). According to the national environmental legislation, ESM has prepared two EIA Reports (Elaborates) for the two photovoltaic power plants of 60 MW and 100 MW. EIA Reports were prepared by GEING in 2022 and approved by MoEPP (Approvals UP1-11/4-1289/2022 and UP1-11/4-1290/2022 for 60 MW and 100 MW plant respectively). Within the Approvals, it is stated that the Investor should implement all measures prescribed in the EIA Reports (Elaborates). After being issued, the Approvals are valid for a two-year period during which the construction works must start.

Conducting of a full environmental and social impact assessment (ESIA) for the project is in accordance with the KfW Sustainability (2022) Guidelines and best practices. The ESIA process includes the following activities and documents:

- Environmental and Social Impact Assessment (ESIA) Study
- Non-Technical Summary
- Stakeholder Engagement Plan (SEP)
- Livelihood Restoration Plan (LRP)
- Environmental and Social Action Plan (ESAP), as well as development of
- Environmental and Social Management Plan (ESMP).

2.2 Project Activities and Total Project Cost

During the pre-construction and construction of Bitola 2 and Bitola 3 PV plants, the following main activities will be implemented:

- Land Clearance,
- Land Leveling,
- Land compacting with compactors
- Internal road and storage locations construction,
- Fence work (Excavation and concreting of the polls and mesh installation),
- Fixing of the mounting structures with,
- Installation of solar PV modules and Cable laying/ stringing,
- Installation of Inverters and transformers,
- Excavation for underground 35 kV cable laying,
- Construction of the 35/110 KV transformer stations on each PV plant location,
- Construction of double system 110 kV overhead transmission line from Bitola 3 to Bitola 2 and to main REK Bitola transformer station.

During the Operation Phase regular maintenance activities are essential to maximize the energy yield and the plant's useful life. The main activities are related to regular panels cleaning, which will ensure energy yield. Duration between cleans depends on dust and other dirtiness which will be deposited on panels, local rainfall patterns (drier weather will result in more deposits) and the time of the year. Specific cleaning procedures should be based on module manufacturer's instructions, site conditions, quality of water and cleaning mechanism used, which involve safety of the personnel, cleaning time, quality of water, use of cleaning agent, water pressure and temperature.

The manufacturer usually has guarantee of 25 years on the panels and 5 years for the Inverters, but during the operational phase regular replacement of the broken and worn parts, transformers and breaker checks etc. will happen. During the inspection and maintenance activities, mainly WEEE will be generated.

2.3 The total project cost for the construction of the PVPPs Bitola 2 and Bitola 3 is estimated to be 113,20 million euros (34,1 million euros for Bitola 2 and 79,1 million euros for Bitola 3)². Project Location and Area of Influence

The proposed areas for construction of these two PVPPs are located within the border of REK Bitola, which lies within the rural municipality of Novaci. However, the biggest part of the workforce of REK Bitola (Thermal Power Plant & Mine) is from the neighboring municipalities of Bitola and Mogila. Novaci, Bitola and Mogila are three municipalities included in the Pelagonija region (Figure 1).

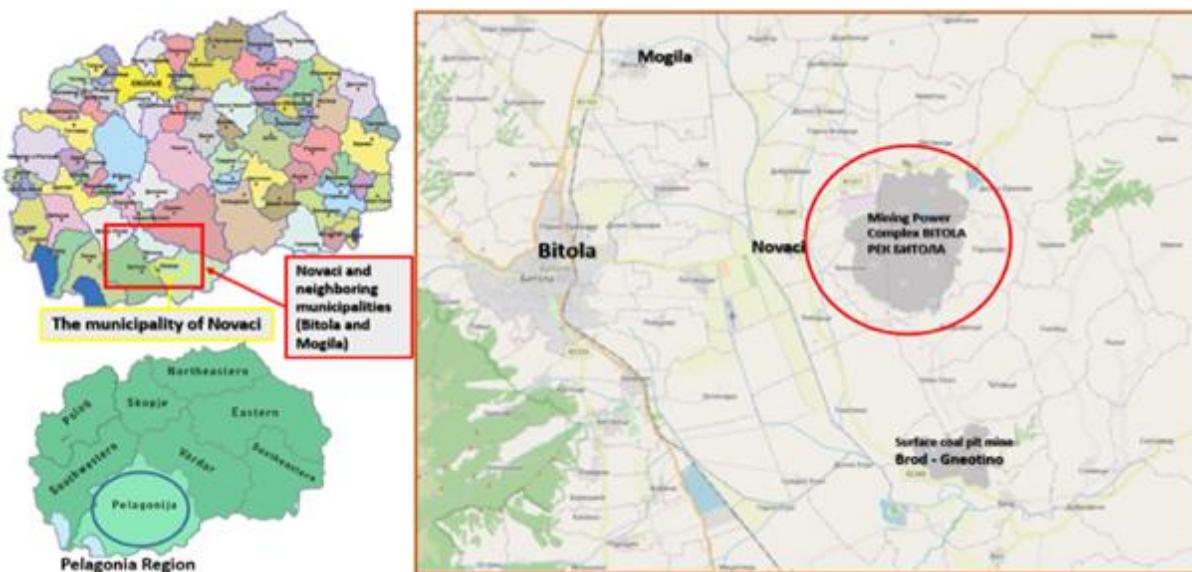


Figure 1: Macro location of the project

On the following map (Figure 2), the location of PVPP Bitola 2 and PVPP Bitola 3 and the municipality of Novaci and neighboring municipalities of Bitola and Mogila are shown. The distance between the center of the municipality of Bitola and the project location of PVPPs Bitola 2 and Bitola 3 is more than 13 km. The distance between the center of the municipality of Mogila and the proposed PVPPs Bitola 2 and Bitola 3 is more than 11 km.

² Draft FS for PVP Bitola 2 and PVP Bitola 3 and transmission lines (August 2023)



Figure 2: Locations of PVPP Bitola 2 and PVPP Bitola 3 and surrounding municipalities

The Project Area of Influence (AoI) of PVPP Bitola 2 and PVPP Bitola 3 is determined by the Direct Area of Influence (DAoI) and Wider Area of Influence (WAoI):

- The Project Direct Area of Influence (DAoI) of Bitola 2 has been defined within the planned project construction of the PVPP Bitola 2 area boundaries. This area includes part of cadastral territories of the following villages: Suvo Dol, Dobromiri and Novaci. The selected area for project implementation is unpopulated, and there are no private properties there, such as: houses, farms, auxiliary facilities/structures, roads, etc. The land parcels of these territories are mostly (more than 99%) owned by ESM, and the rest is state-owned. The residential parts of territories of the villages Dobromiri and Novaci are at a distance of more than 2.7 km.
- The DAoI for PVPP Bitola 3 has a boundary within the planned project construction of the PVPP Bitola 3 area. This area includes part of cadastral territories of the following villages: Vranjevci, Baldovenci and Paralovo. The selected area for project implementation is unpopulated, and no private properties are there, such as: houses, roads, farms, auxiliary facilities/structures, etc. The residential part of these villages is at a distance of more than 4 km. The land parcels of the project area are more than 86% owned by ESM, and the rest is state-owned. A very small amount of land is under joint ownership (ESM-State). The DAoI for the 110 kV transmission line is defined as an area of restriction of work along the TL at 50 m distance from each side according to the national regulation.

Physically the project site of Bitola 2 and Bitola 3 PVPPs will be demarcated and fenced. Within the boundaries of project construction sites, there will be encompassed the transmission line RoW (new, to be constructed) and part of regional access and internal roads.

Although project areas (Bitola 2, Bitola 3 and TL) are mainly characterized as dump sites for disposal of waste rock material during the uncovering/exploitation of the coal, there are areas with a cover of natural vegetation formed since the disposal till the present.

- Project Wider Area of Influence (WAoI) is defined as an area within a 5 km radius from the boundaries of the project area/DAoI. This area is identified as significant in order to determine the social impacts of the project implementation, like employment opportunities, loss of livelihoods, increased activities

in remote areas, usage of local/regional roads, supply chain, etc. The settlements within project WAoI for Bitola 2 are the following: Novaci, Gorno Aglarcı, Dolno Aglarcı, Dalbegovci, Armatush, Meglenci, Dolno Orehovo, Paralovo, Vranjevci and Biljanik. The settlements within the project WAoI of Bitola 3 are the following: Novaci, Suvo Dol, Dobromiri, Meglenci, Dolno Orehovo, Gnilesh, Tepavci, Novo Selo, Grumazi, Ribarci and Biljanik.

- The WAoI for the TL is 200 m distance from each side along the transmission line. Both DAoI and WAoI for TL and substations are included in the WAoI for PVPP Bitola 2 and Bitola 3.

The DAoI and WAoI for PVPP Bitola 2 are shown in Figure 3 and for PVPP Bitola 3 in Figure 4. The DAoI and WAoI for Transmission line (TL) and existing and new planned substations are presented in Figure 5. These areas of influence are within the WAoI of PVPP Bitola 2 and Bitola 3.

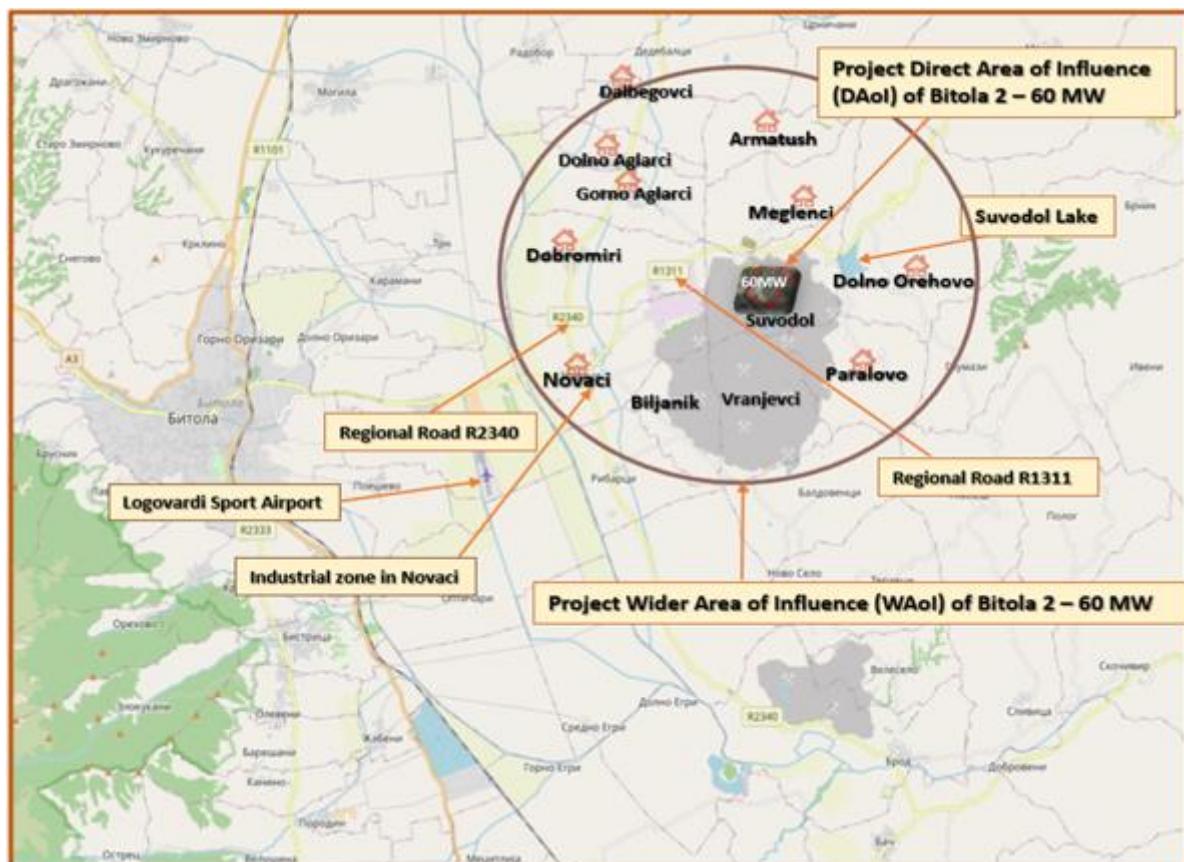


Figure 3: Map with DAoI and WAoI for PVPP Bitola 2

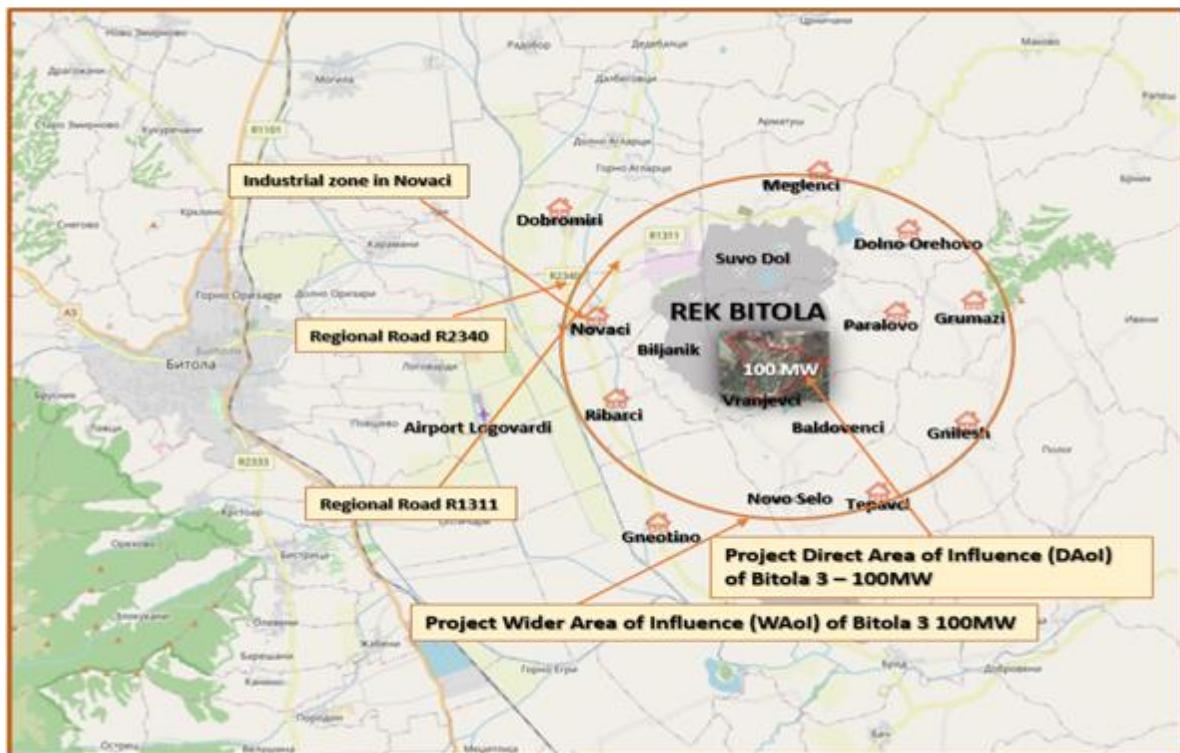


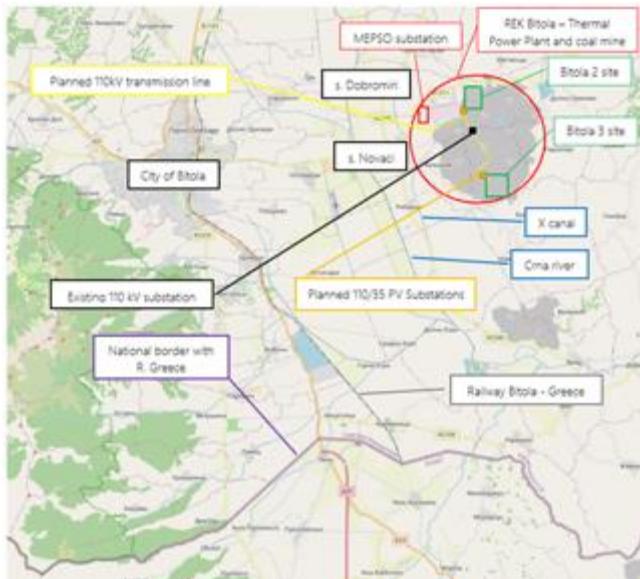
Figure 4: Map with DAoI and WAoI for PVPP Bitola 3

Direct Area of Influence (DAoI) and Area of Influence (AoI) for project will be updated (if required) based on the final ESIA report.

2.4 PVPP Bitola 2

The project site for PVPP Bitola 2 is located about 12 km northeast of the city of Bitola, within the municipality of Novaci near the REK Bitola Thermal Power Plant. The REK Bitola (Thermal Power Plant and Coal Mine) is located on the periphery of the Pelagonija basin, about 12 km northeast of the city of Bitola and about 15 km north of the Greek border.

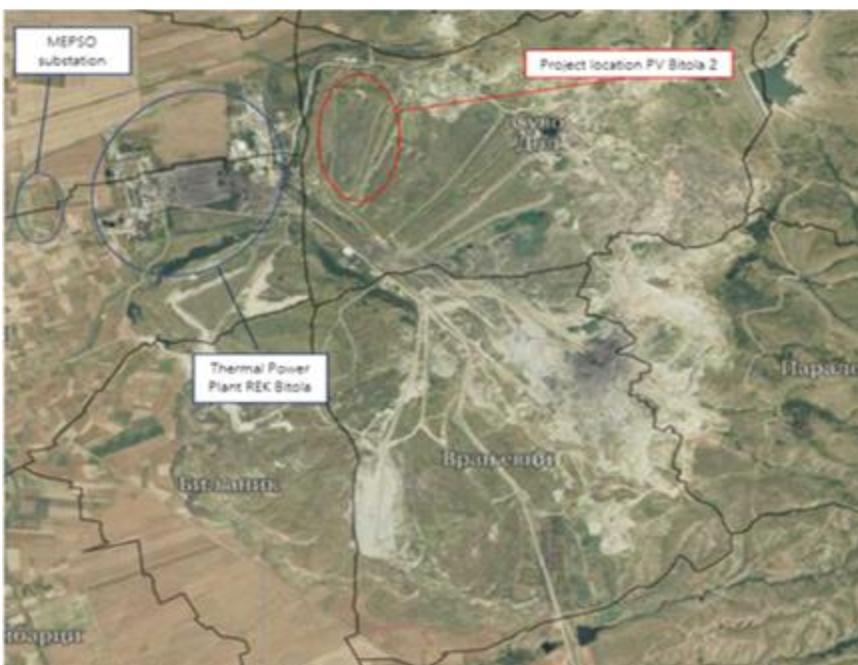
The nearest populated areas relevant for the PVPP Bitola 2 site are the settlement Novaci (about 2.8 km southwest of PVPP Bitola-2) and the settlement Dobromiri (about 3.6 km west of this PVPP) presented in Figure 5.



Source: openstreetmap.org

Figure 5: Macro location of PVPP Bitola-2 site

The nearest access road to the project site Bitola 2 is regional road R1311, located at the northern border of the project site. The other site access paths are unpaved dirt roads (accessible with trucks), located near the north and west side of the project site. The Bitola-Greece railway is located about 13 km west and southwest of the Bitola-2 site.



Source: <https://ossp.katastar.gov.mk/OSSP/>

Figure 6: Micro location of PVPP Bitola-2 site

The proposed site forms part of the open pit mining area operated by ESM. It is a site of 110 hectares with a perimeter of about 4.53 km. The aerial picture below shows the site between ESM company grounds in the west and an open pit with digging activities still ongoing (Figure 7).

The proposed land for construction of PVPP Bitola 2 is owned by ESM (99.59% of the total land), and the rest is government owned. The site itself is mainly characterized by an open pit mining area operated by

ESM and used as a waste rock dumping area which has a rough surface and is partially naturally vegetated.



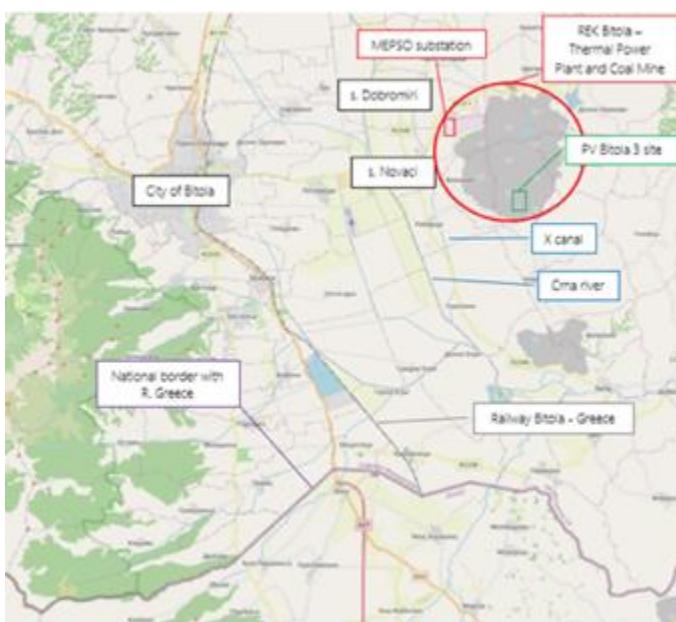
Source: Site visit photos taken by Geing/Fichtner team

Figure 7: Proposed PVPP Bitola-2 site

PVPP Bitola 2 is expected to have about 183,750 PV panels with 400 Wp power each. Total installed peak power will be 73.5 MWp. Based on these assumptions, total output power is calculated as 60 MW. The expected yearly electricity production is 112 GWh. PVPP Bitola 2 will be connected to a new two-system 110 kV transmission line with transformer station consisting of two 110/35 kV transformers with installed power of 31.5 MVA each.

2.5 PVPP Bitola 3

The project site for PVPP Bitola 3 is located about 13.5 km east of the city of Bitola, within the municipality of Novaci, within the border of REK Bitola. REK Bitola is located on the periphery of the Pelagonija basin about 11 km northeast of the city of Bitola and about 15 km north of the Greek border (Figure 8).



Source: openstreetmap.org

Figure 8: Macro location of PVPP Bitola 3 site

The access roads to the project site for PVPP Bitola 3 are regional roads R1311 (Bitola – Novaci) and R 2340 (Novaci – Bach). The other site access paths are unpaved dirt roads (accessible with trucks), located near the north and west side of the project site. The Bitola-Greece railway is located about 12 km west and southwest of the Bitola 3 site (Figure 9).



Source: <https://ossp.katastar.gov.mk/OSSP/>

Figure 9: Micro location of Bitola 3 site

AD ESM owns 86.4% of the total land for PVPP Bitola 3. Only 13% of the total land is state-owned land, and less than 1% of the land is under joint ownership. There are no privately owned parcels.

The proposed site forms part of the open pit waste rock dumping area operated by ESM. It is a site of 201 hectares with a perimeter of about 7.1 km. The aerial picture below (Figure 10) shows the site. A conveyor belt separates the site from the main dirt road at the entire western border.



Source: Site visit photos taken by Geing/Fichtner team

Figure 10: Proposed PVPP Bitola 3 site

PVPP Bitola 3 is expected to have about 273,000 PV panels with 425 Wp power each. Total installed peak power will be 116 MWp. Based on these assumptions, total output power is calculated as 100 MW. The expected yearly electricity production is 181 GWh. PVPP Bitola 3 will be connected to a new two-system 110 kV transmission line (the same for PVPP Bitola 2) with transformer station consisting of three 110/35 kV transformers with installed power of 50 MVA each.

The closest water body to PVPP Bitola 3 is channel no. 10. This channel is a part of the Pelagonija region drainage system managed by JSC Water Economy of RNM – Subsidiary "Bitolsko pole" - Bitola. The water of this channel flows into the Crna River. This channel is also a recipient of treated discharged water from the thermal power plant. The discharge point is downstream from the two PVPPs.

2.6 Transmission Lines

The proposed 110 kV Transmission line will connect PV Bitola 3 and PV Bitola 3 to national transmission grid through HV SS 400/110 kV Bitola 2. Both PV Plants will have own 110/35_kV transformer substations (SS) on the closest point to transmission line. The route of the transmission line is given on Figure 11.

It starts as circuit OHTL from PV SS 110/35 kV Bitola 3 towards PV SS 110/35 kV Bitola 2 (yellow line) and after PV SS 110/35 kV Bitola 2 continues to the existing HV SS 400/110 kV Bitola 2 in one-point OHTL continues as underground cable line (red line) and enters in 110 kV bays A14 and A16 in HV SS 400/110 kV Bitola 2. The length between the new PV substations Bitola 3 and Bitola 2 is about 5 km.

The length between the new PV SS Bitola 2 and the existing HV SS 400/110 kV Bitola 2 is about 4 km of which 3 km is OHTL and about 1 km is 110 kV underground power cable.

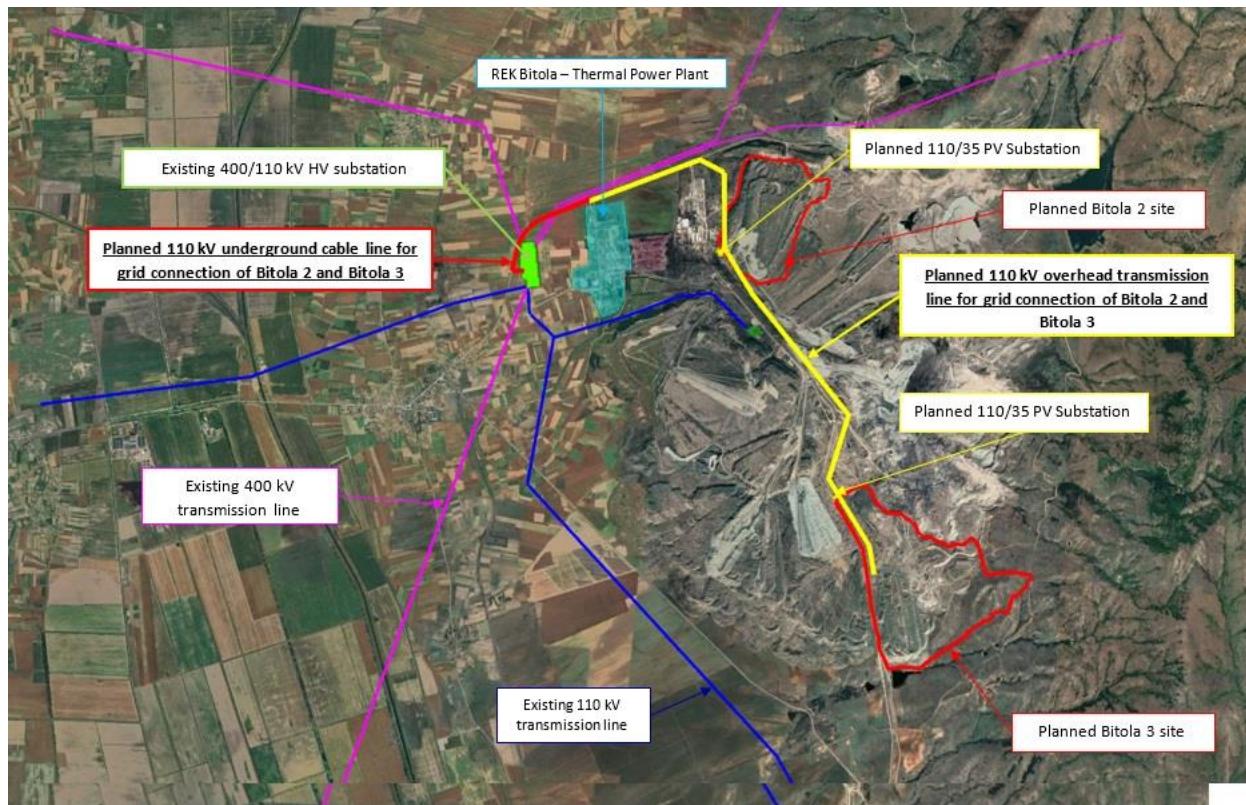


Figure 11 Route of the Transmission lines (OHTL and underground cable lines)

3 Regulatory Requirements for Stakeholder Engagement

The preparation, implementation and operation of the project will comply with the laws and regulations of the Republic of North Macedonia; and KfW requirements, herewith the World Bank Environmental and Social Standards (WB ESS), the general WB Group EHS Guidelines; and relevant sector-specific WB Group EHS Guidelines and the ILO Fundamental Instruments; as well as the environmental and social standards of the EU whichever is stricter.

3.1 National Regulations and Requirements

The Republic of North Macedonia has adopted several international conventions, laws, 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 1.

Table 1: National legislation related to stakeholder engagement

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, 32/20).	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. 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 presentations and public surveys. 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

Legislative Area/Stage of Project Permitting	Key Laws	Summary of Stakeholder Engagement Requirements
		questionnaire including a rationale for the acceptance or non-acceptance of his / her comments or suggestions.
	Law on Environment ("Official Gazette of the 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, 129/15, 192/, 139/16, 99/18 and 89/22 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 requirements of inland public. Concerned parties can present opinions, comments, and demands, which the investor and the designer should review and appropriately accept and incorporate into the final project. Comments and the demands which cannot be accepted should be properly explained and the parties concerned 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 writing or electronically. Each entity has a right to access the holder's information.
EIA ³ and Environmental Permit Process	(Law on Environment ("Official Gazette of the 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, 129/15, 192/, 139/16, 99/18 and 89/22).	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 the legislative requirements. This applies to the following: <ul style="list-style-type: none"> ▪ 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 to submit an appeal to 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,	Decisions for approval of the EIA Reports issued by the Ministry of Environment and Physical Planning (MoEPP).

³ Note – in R North Macedonia, the document is termed an EIA, whereas the term ESIA is increasingly used internationally, including in WB standards and financed projects.

Legislative Area/Stage of Project Permitting	Key Laws	Summary of Stakeholder Engagement Requirements
	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).	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 an appeal on the building permit within 15 days after issuing the permit. Construction permit 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 construction project, e.g., neighbors	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.

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 and Social Standards".

One of the established WB standards that the borrower and the sub-projects will meet through the project lifecycle is ESS 10: "Stakeholder Engagement and Information Disclosure" that recognizes "the importance of open and transparent engagement between developer 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 lifecycle, 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 disclose 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 needs 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.

3.3 Gap Analysis Table

Stakeholder engagement shall be carried out in accordance with the applicable national legislation and requirements of KfW, which follows the WB group standards and policies. Table 2 below provides the comparative analysis between the national legislation and requirements of KfW 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 2: Gap analysis

Issue	KfW/ WB policy requirements and standards	Provisions of R.N.M. law	Gap / Comment	Proposed response
Stakeholder Engagement Plan	<p>KfW and WB require the preparation of an SEP in which the client or other responsible entity specifies the procedures, actions and measures related to stakeholder engagement. The SEP shall be prepared in order to describe the information, communication and engagement of the stakeholders.</p> <p>The objectives of the development of an SEP are the following:</p> <ul style="list-style-type: none"> ▪ To establish a systematic approach to stakeholder engagement. ▪ To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into the 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, 	<p>According to Macedonian law, there is no need to develop a separate SEP. Within the ESIA, there is a chapter related to stakeholder engagement.</p>	<p>There is no provision related to develop an SEP under the Macedonian legislative.</p>	<p>SEP will be developed.</p> <p>The SEP will identify the stakeholders and propose the type of information and way of communication. The SEP will provide early stakeholder communication, planned activities, grievance mechanism, monitoring and reporting.</p>

Issue	KfW/ WB policy requirements and standards	Provisions of R.N.M. law	Gap / Comment	Proposed response
	understandable, accessible, and appropriate manner and format. ⁴			
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 Macedonian law, there is no need to develop a separate document for information of persons with disabilities.	There is no provision related to developing a separate document for information of persons with disabilities.	A separate chapter will be developed within the SEP with key points of the project related to the information of persons with disabilities (if any are identified).
Grievance Mechanism	KfW and WB require the establishment of an effective project 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 ⁵ .	According to Macedonian law, there is no need to develop a separate grievance mechanism. Within the SEP, there is a chapter related to the grievance mechanism.	There are no provisions under national law related to establishing the project-specific Grievance Redress Mechanism.	A Grievance Redress 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 grievances. Each grievance will be recorded in a registry / log with all necessary information.

⁴ WB/IBRD-IDA (2017): The World Bank Environmental and Social Framework, Washington

⁵ Ibid

4 Stakeholder Identification and Analysis

WB ESS10 recognizes three broad categories of stakeholders:

- project-affected parties,
- other interested parties, and
- 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, safety, 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 3 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 if any new stakeholders are identified over the course of the project lifecycle.

Table 3: Stakeholder Identification and Mapping for PVPP Bitola 2 and PVPP Bitola 3

Stakeholder	Role and connection to the project	Method of communication
Key Stakeholders		
Joint-Stock Company Elektrani of RNM—AD ESM (ESM)	AD ESM is responsible for the implementation and supervision of the project. AD ESM is responsible for the contractor selection process, whereby they will be in charge of cooperation, monitoring and communication with the contractor.	<ul style="list-style-type: none">▪ Individual meetings▪ Regular reports from the Contractor about the project activities and on-site management▪ Reviewing of the development and implementation of ESIA; LRP; NTS; SEP; Grievance mechanism
AD ESM PIU	AD ESM / PIU is responsible for the implementation, financial management and overall delivery of the project. The Interest in working conditions and grievance mechanism, compliance with health, safety, and conduct accepted policies and procedures within the REK Bitola.	<ul style="list-style-type: none">▪ Individual meetings▪ Participation in public consultation meetings▪ Official correspondence

Stakeholder	Role and connection to the project	Method of communication
ESM Managers for ESHS Management Systems (ISO 9001/14001/45001)	Implementation of ISO 9001/14001/45001 procedures during the project development and implementation.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Participation in public consultation meetings ▪ Official correspondence
Thermal Power Plant & Mine "Bitola" - Novaci (PEK Bitola-Novaci) ⁶	The company is responsible for the production of energy, and the project areas of Bitola 2 and Bitola 3 are located within the borders of REK Bitola.	<ul style="list-style-type: none"> ▪ Individual and group meetings ▪ Participation in public consultation meetings ▪ Official correspondence.
Existing Contractors working for REK Bitola and lignite mine	Work in the same working environment or in a working environment which is near the proposed project areas, Bitola 2 and Bitola 3.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Official correspondence
JSC MEPSO – Electricity Transmission System Operator of the Republic of North Macedonia, a joint-stock company for electricity transmission and power system control, in state ownership, Skopje	Responsible for the connection of Bitola 2 and Bitola 3 to the electricity grid. JSC MEPSO proposed variants for connection of Bitola 2 and Bitola 3 to the electricity grid. The Investor in cooperation with consultants will make the decision about the connection to the electricity grid.	<ul style="list-style-type: none"> ▪ Individual and group meetings ▪ Participation in public consultation meetings ▪ Official correspondence
PV equipment suppliers and energy equipment suppliers	Responsible for supply of the photovoltaic and energy equipment.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Official correspondence
Consulting companies and designers of technical documentation	Responsible for consulting activities and design of technical documentation.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Official correspondence
Workers' Trade Union representatives	Information for the project development and implementation.	<ul style="list-style-type: none"> ▪ Official correspondence
National Government Institutions		
Ministry of Environmental and Physical Planning of the Republic of North Macedonia	Issuing permits / approvals / decisions. Responsible for reviewing and approving environmental impact assessments (EIA Report/Elaborate and Strategic Environmental Impact Assessment)	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Participation in public consultation meetings ▪ Official correspondence.
Ministry of Agriculture, Forestry and Water Economy of the Republic of North Macedonia Sector for registration, management, promotion, and sale of state-owned agricultural land	Responsible for registration and management of state-owned agricultural land within the project area of Bitola3 (in total 13 land parcels). There is the need to conduct the conversion of state-owned agricultural land into construction land.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Official correspondence.

⁶ The production subsidiary - Mining power complex "Bitola" - Novaci (РЕК Битола - Новаци) consists of two production units: Mines and Thermal Power Plant (TPP) Bitola.

Stakeholder	Role and connection to the project	Method of communication
Public Enterprise for Management of State-owned Pastures Regional office in Bitola	Responsible for management of state-owned pastures. There is one state-owned land parcel classified as pasture within the project area of Bitola 3.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Site visit and marking the areas used as pasture ▪ Official correspondence
Ministry for Economy of the Republic of North Macedonia	Responsible for energy policymaking (elaboration of the energy strategy, preparation and implementation of legislative framework and co-ordination of activities in the energy field). On behalf of the Government of Macedonia, the Ministry is responsible for reviewing documents for issuing authorization to build new energy power plants with capacity above 10 MW.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Participation in public consultation meetings ▪ Official correspondence
Ministry of Transport and Communication of the Republic of North Macedonia	The Ministry is a directly competent institution in resolving property right issues, preparing state urban planning documentation and issuing permits for construction to be used for renewable energy plants. Indirectly, the Ministry is involved in approval of Urbanistic projects (urban planning document) and involved in the Strategic Impact Assessment process.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Site visit and marking the pasture ▪ Official correspondence
Agency for Real Estate Cadastre of the Republic of North Macedonia	Responsible for registration of real estate rights. After conversion of the agricultural land into construction land, the Agency shall update the information related to the cadastral culture and the ownership of the land.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Official correspondence
Energy Agency of the Republic of North Macedonia	ESM must enroll the PVPPs in the Register of Power Plants which produce electricity from renewable energy sources maintained by the Energy Agency. ESM will submit a request to the Energy Agency for enrolment in the Register.	<ul style="list-style-type: none"> ▪ Official correspondence
Energy Regulatory Commission of the Republic of North Macedonia	The Commission issues electricity generation licenses and grants preferential producer status for electricity generation from renewable energy sources. It is responsible for entry into the Register of plants for electricity production from renewable energy sources and acquiring status for preferential renewable energy generator.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Official correspondence
Local Government Stakeholders		
Project-affected municipalities (Municipality of Novaci, Municipality of Bitola and Municipality of Mogila)	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 construction phase in order to ensure that all the construction works are aligned with the accepted plans and initiatives.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Participation in public consultation meetings ▪ Official correspondence

Stakeholder	Role and connection to the project	Method of communication
Public utility companies in the project-affected municipalities. <ul style="list-style-type: none"> ▪ PE Communal Hygiene – Novaci ▪ Public Enterprise “Komunalec” - Bitola ▪ PUC Pella Hygiene - Mogila 	These companies are in charge of providing water supply and sanitation services to the local communities, thus they must be consulted before and during the construction phase to ensure that all the project activities are aligned with the existing local infrastructure and plans for future development.	<ul style="list-style-type: none"> ▪ Individual meetings ▪ Regular communication with the contractor ▪ Approval of construction works related to communal infrastructure ▪ Official correspondence
Contractor / Subcontractor		
Selected contractor and subcontractor(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 style="list-style-type: none"> ▪ Monthly reporting to ESM ▪ Participation in public consultation meetings ▪ 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 ▪ Regular monitoring performance of contractors in the implementation of the project activities ▪ Provision of relevant documents in tender
Local Community Stakeholders		
Local communities in the project-affected settlements (Novaci, Dobromiri, Suvodol, Meglenci, Armatush, Biljanik, Paralovo, Dolno Orehovo, Vranjevci, Baldovenci)	The inhabitants of project-affected settlements could be affected by transportation of heavy equipment for the construction of PVPPs, the influx of workers, etc.	<ul style="list-style-type: none"> ▪ Information through adequate media ▪ 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 (ESIA/ESMP/NTS; LRP; SEP, ESAP) ▪ Public consultation meetings; communication through the bulletin boards by posting project information/ notices ▪ Specific targeted information for inhabitants of the affected settlements on construction of PVPPs and possible dangers associated with these activities
Project-Affected Persons (PAPs) are local farmers who have herds of cows and sheep and the shepherds who come from Western Macedonia	The local farmers have a practice to use the parts of project area of both PVPPs for pasture. In fact, the project areas are currently used by a small number of farmers for informal grazing of cattle. It is important to note that the farmers have no license to pasture the cattle within the REK Bitola.	<ul style="list-style-type: none"> ▪ Information through adequate media ▪ Public and individual meetings with PAPs and explanations of the project; development of LRP and conducting the socio-economic survey with PAPs ▪ Information about the prepared project documents (ESIA/ESMP/NTS; LRP; SEP, ESAP) ▪ Public consultation meetings; communication through the bulletin

Stakeholder	Role and connection to the project	Method of communication
		<p>boards by posting project information/ notices</p> <ul style="list-style-type: none"> ▪ Specific targeted information for inhabitants of the affected settlements on construction of PVPPs and possible impacts associated with these activities
Local businesses in the project area	<p>Their businesses (Farmers) may be affected due to construction of PVPPs; 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.</p>	<ul style="list-style-type: none"> ▪ Information through adequate media ▪ Public and individual meetings and explanations of the project; consultations for socio-economic survey for LRP ▪ Information about the prepared project documents (ESIA; LRP; NTS; SEP) ▪ Public consultation meetings; communication through the bulletin boards by posting project information/ notices
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.	<ul style="list-style-type: none"> ▪ Targeted communication with the identified vulnerable groups/individuals via phone or meeting with them in person. For communication with persons with disabilities, a separate document with key points of the project will be developed within the SEP. ▪ Assistance throughout the project lifecycle
Employment Service Agency of the Republic of North Macedonia Regional office in Bitola	The Contractors in cooperation with the regional office in Bitola will announce their employment needs with a clear application procedure to provide equal opportunities for all and apply the transparent employment practices.	<ul style="list-style-type: none"> ▪ Official correspondence: Information through email, letters, or phone calls
<p>Educational institutions in the immediate and wider project area</p> <ul style="list-style-type: none"> ▪ Elementary school Slavko Lumbarkovski in Novaci; ▪ Kindergarten in Novaci; ▪ Regional school for elementary education in Dobromiri. 	<p>Pupils/students may be affected during construction due to a 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 jeopardize their daily commute. Local educational institutions (especially in Novaci) will be informed about all project activities, especially in regard to the planned transportation works which may alter the regular traffic flow.</p>	<ul style="list-style-type: none"> ▪ Official correspondence: Information through email, letters, or phone calls

Stakeholder	Role and connection to the project	Method of communication
Hospitals/health facilities in the near vicinity (e.g., access roads) <ul style="list-style-type: none"> ▪ Private Health Institution (Dr Daskal and Pharmacy) in Novaci; ▪ Health Center in Bitola; ▪ Clinical Hospital in Bitola. 	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 construction works which may alter the regular traffic flow (mainly transports from and to the PVPPs).	<ul style="list-style-type: none"> ▪ Official correspondence: Information through email, letters, or phone calls
Fire stations <ul style="list-style-type: none"> ▪ The municipality of Novaci has a multifunctional firefighting vehicle for extinguishing fires and four trained workers; ▪ Fire Station in Bitola. 	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 construction works (mainly transports from and to the PVPPs) which may alter the regular traffic flow.	<ul style="list-style-type: none"> ▪ Official correspondence: Information through email, letters, or phone calls
Media, NGOs, and Civil Society Organizations		
NGOs and civil society organizations <ul style="list-style-type: none"> ▪ Geosfera – is active in promotion of ecology in the Bitola region. ▪ Mission of Sfera International is to raise awareness and to educate communities through non-formal education methods on a variety of topics including environmental protection, cultural awareness, healthy lifestyle, youth development, etc. ▪ NGO Molika was involved in several projects, and one of them is the project for establishing an integrated, sustainable system for organic 	NGOs and civil society organizations must be regularly consulted and informed throughout all project phases to ensure their full understanding and acceptance of the project, whereby all their concerns shall be properly addressed.	<ul style="list-style-type: none"> ▪ Official correspondence: Information through e-mails, letters, or phone calls ▪ Public consultation meetings and individual meetings

Stakeholder	Role and connection to the project	Method of communication
<p>waste management, as well as developing schemes for trading organic waste within the framework of cross-border cooperation with a neighboring Greece.</p> <ul style="list-style-type: none"> ▪ Association for sustainable urban development – Bitola is very active in the Pelagonija region and made significant contributions to ecological activities. 		
The Media		
National TV and radio stations, press, news portals	Selected national media will be actively involved in dissemination of project information.	<ul style="list-style-type: none"> ▪ Official correspondence: Sharing project-related information and updates (ESM)
Local TV and radio stations, press, news portals	Local media will be actively involved in dissemination of project information.	<ul style="list-style-type: none"> ▪ Official correspondence: Sharing project-related information and updates (ESM)

5 Previous Stakeholder Activities

The plans for construction of two PVPPs (Bitola 2 and Bitola 3) on AD ESM's website were announced (May 2022), under the title 'Capital Projects' (<https://www.esm.com.mk/?p=13164>). AD ESM developed the necessary documentation for these projects. It is significant to note that an article published in the Balkan Green Energy News about their capital investments related to construction of solar power plants highlights the PVPPs' construction on waste rock sites/sites devastated by mining activities in the complexes of REK Bitola⁷.

During development of the project documentation related to the environmental and social aspects for construction of PVPP Bitola 2 and PVPP Bitola 3, the representatives from FICHTNER/GEING ES team conducted various meetings with the local authorities (mayors or secretaries of the municipalities), with the management of REK Bitola, as well as the representatives of NGOs. (Geosfera, Sfera International, Molika and Association for sustainable urban development – Bitola). Several meetings were held on 12 December 2022 during the site reconnaissance and verification visit, and later in December, with more details provided in Table 4.

The site visit photo log is given in Appendix 6 (site visit photos taken by Fichtner/GEING team), and in Appendix 7 detailed minutes of the stakeholder meetings, consultations and interviews are provided.

⁷ Balkan Green Energy News, ESM is developing power plant projects with total capacity of 1.8 GW, published on February 3rd, 2023, accessed on February 6th, 2023. <https://balkangreenenergynews.com/esm-is-developing-power-plant-projects-with-total-capacity-of-1-8-gw/>

Table 4: Project Consultations (Environmental and Social Expert Team)

	Target group / attendees	Consultation	Period	Notes (See details in Appendix 7)
1.	<u>Fichtner /GEING team:</u> Slavjanka Pejcinovska-Andonova - ESIA Expert Marija Nikoloska – Environmental Expert Jelena Sekulovska – Environmental Expert Zdravko Andonov – Energy Expert Vedran Andonov – Environmental and Energy Expert PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski - Assistant of Social Expert <u>REK Bitola Representative:</u> Atanas Tabakovski – Director of the Department for Investments and Development of REK Bitola	Meeting at the premises of REK Bitola	December 12th, 2022	<p>Discussed topics:</p> <ul style="list-style-type: none"> • The planned project activities, • specific issues related to the project including the type of land and land ownership of the project locations; location of transmission line which will provide grid connection of PV Plant Bitola 2 and PV Plant Bitola 3; future planned projects, etc. <p>After the meeting, the project teams defined the future activities and communication with REK Bitola Representatives.</p>
2.	<u>Fichtner /GEING team:</u> Slavjanka Pejcinovska-Andonova - ESIA Expert Marija Nikoloska – Environmental Expert Jelena Sekulovska - Biodiversity Expert Zdravko Andonov - Energy Expert Vedran Andonov – Environmental and Energy Expert PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski - Assistant of Social Expert <u>REK Bitola Representatives:</u> Mr. Stojanovski Ljupco, Department for Development - Environmental Coordinator and responsible for Environmental Permit Ms. Natasha Popovska, Department for Development - Mechanical Engineer Mr. Zvonko Jovanoski, Department for technical safety (including OH&S and Environment)	Meeting at the premises of REK Bitola (Environmental and H&S Department)	December 12th, 2022	<p>Discussed Topics:</p> <ul style="list-style-type: none"> • Environmental Permit of REK Bitola; • waste rock material composition • waste rock material handling, including recultivation according to the Plan for recultivation. • Location for planned regional waste landfill Meglenci • water quality, drainage and water collection facilities of the project area. • Air quality and air emissions, • Environmental Ermattung of Project; • ISO 114001, ISO 45001 and ISO 9001 certifications <p>After the meeting, the Fichtner/GEING team defined the future activities, necessary documentation, and communication.</p>

	Target group / attendees	Consultation	Period	Notes (See details in Appendix 7)
	Mr. Ilija Dimovski, Department for technical safety (including OH&S and Environment)			
3.	<p><u>Fichtner /GEING team:</u> Slavjanka Pejcinovska-Andonova - ESIA Expert Marija Nikoloska – Environmental Expert Jelena Sekulovska - Biodiversity Expert Zdravko Andonov - Energy Expert Vedran Andonov – Environmental and Energy Expert PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski - Assistant of Social Expert</p> <p><u>Municipality of Bitola representative:</u> Mr. Goran Nedelkov - Energy Efficiency Adviser at Municipality of Bitola</p>	Meeting at the premises of the Municipality of Bitola	December 12th, 2022	<p>Discussed topics:</p> <ul style="list-style-type: none"> type of land and land ownership of the project locations, future planned projects (relevant for the project locations) according to the ESM Development Programs/Plans, Future planned project related to energy efficiency of Municipality of Bitola, etc. cross-border cooperation with the Republic of Greece; the Project documentation for the construction of the photovoltaics in REK Bitola.
4.	<p><u>Fichtner/GEING team</u> PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski (Assistant of Social Expert)</p> <p><u>NGOs Representatives:</u> Mile Ristov – NGO Geosphere – Bitola Petar Andonov, President of the Ecological Association MOLIKA – Bitola Milcho Duli, NGO Sfera International – Bitola Anastasija Trajkovska, Vice President of NGO – Association for Sustainable Urban Development - Bitola</p>	Meeting with NGOs at the premises of the NGO Sphere International in Bitola	December 13th, 2022	<p>Discussed Topics:</p> <ul style="list-style-type: none"> Dust from the coal mine the amounts of waste following the decommissioning phase; capacity and activity of the Municipality of Novaci to cover issues related to the environment; insufficient residents' awareness about the construction of the landfill in the Municipality of Novaci. Public hearings and NGOs participation. Future project activities:
5.	<p><u>Fichtner/GEING team</u> PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski (Assistant of Social Expert)</p>	Meeting at the premises of the	December 13th, 2022	<p>Discussed Topics:</p> <ul style="list-style-type: none"> Dust emission and related health issues

Target group / attendees	Consultation	Period	Notes (See details in Appendix 7)	
	<u>Municipality of Mogila representative:</u> Mr. Draganco Sabotkovski – Mayor of the Municipality of Mogila	Municipality of Mogila		<ul style="list-style-type: none"> environmental pollution in relation with the quality of agricultural products, dismissal of workers from the Mine and Thermal Power Plant (REK Bitola). <p>As future activities related to the project, it has been agreed that the Municipality will submit appropriate documents in an electronic version in the shortest period of time possible.</p>
6.	<u>Fichtner/GEING team</u> PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski (Assistant of Social Expert) <u>Municipality of Novaci representatives:</u> Mr. Stevche Stevanovski - Mayor of the Municipality of Novaci Mrs. Ljiljana Najdovska - Councilor in the Municipality of Novaci Mrs. Letka Jovanovska - Head of the Department for communal activities, traffic, urban planning and environmental protection and local economic development	Meeting at the premises of the Municipality of Novaci	December 13th, 2022	<p>Discussed Topics:</p> <ul style="list-style-type: none"> monitoring of the pollution in the Municipality of Novaci, especially with the excessive amount of dust, the usage of the regional road R1311 (the frequent use of the regional road will lead to traffic congestion and its damage), need to apply effective solutions to reduce the dust dismissal of workers dissatisfaction with the payment of the concession. <p>As future activities related to the project, it has been agreed that the Municipality will submit appropriate documents in an electronic version in the shortest period of time possible.</p>
7.	<u>Fichtner/GEING team</u> Slavjanka Pejcinovska-Andonova - ESIA Expert PhD. Ruzica Cacanoska - Social Expert Dragan Djordjevic, Mech. Eng., Deputy Manager of Design Division <u>AD ESM:</u> Mr. Zvonko Kuskovski – Head of the Department for Investments Mr. Vladimir Popovski - Department for Development and Investments Mrs. Julija Vrtova Simjanovska, M.Sc.	Meeting at the premises of AD ESM Skopje	February 17th, 2023	<p>Discussed Topics:</p> <ul style="list-style-type: none"> project information and documentation. scoping Report and ESIA Study for PVPPs Bitola 2 and 3. quality of soil. legal procedures related to the conversion of state-owned land into construction land, selection of the final option of the project locations Bitola 2 and Bitola. <p>As future activities related to the project, it has been agreed that the representatives from AD ESM will submit all available documents and information in an electronic version in the shortest period of time possible.</p>

Target group / attendees	Consultation	Period	Notes (See details in Appendix 7)
Environmental Specialist Department for Development and Investments			

6 Stakeholder Engagement Program

This Stakeholder Engagement Plan (SEP) has been prepared in respect to all the project phases, i.e., pre-construction, construction and post-construction (operation), whereby it takes into account all the identified stakeholders. Some of the planned stakeholder engagement activities may be constrained due to the likely restrictions imposed by Unexpected Situations/Cases (US/C - natural catastrophes, diseases (COVID 19) etc.), thus each stakeholder engagement activity has been planned in a way that it provides a contingency approach to implementation of the planned activities and processes in a way that ensures that all the interested stakeholders are consulted with in a meaningful manner. A detailed stakeholder engagement plan is provided below in Table 5.

Table 5: Stakeholder Engagement Plan

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to US/ Cases (e.g., COVID 19)
Pre-construction phase (2022/2023)					
All stakeholders	<p><u>Public disclosure package (to be submitted to KfW consideration prior to the disclosure)</u></p> <p>A public consultation meeting should be held with representatives of the interested and affected stakeholders prior to final approval of the ESIA for Bitola 2 and Bitola 3, NTS and SEP with Grievance Mechanism. When ESIA is finalized and approved, the final version should be publicly disclosed on the website of AD ESM.</p>	ESM	Prior to finalization and approval of ESIA, i.e., during the ESIA public disclosure phase.	<ul style="list-style-type: none"> ▪ Organization of a public consultation meeting (with physical presence and/or via Zoom) ▪ Announcement in the local media and websites of AD ESM and project-affected municipalities ▪ Local notice boards ▪ Notice board in project-affected municipalities ▪ NTS of the ESIA will be published online (ESM's and local municipalities' websites) and in the local media 30 days before the public consultation meeting 	Information about the public disclosure of and consultation on the ESIA 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 the ESIA.
All stakeholders	<p><u>Promotion of project timeline, Stakeholder Engagement Plan, ESIA / Notification about the commencement of construction works.</u></p> <p>All interested and affected stakeholders shall be informed about the planned project activities prior to start of construction phase, whereby they should be informed about the extent of planned works, expected duration of construction phase and potential changes of traffic schedule. Additionally, this meeting will serve as a possibility to inform all interested stakeholders about 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 familiarized 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.</p>	ESM and Contractor	Prior to commencement of construction phase	<ul style="list-style-type: none"> ▪ Announcements in the local and national media, leaflets, announcements on local notice boards, online news portals, communication with representatives of the local communities, etc. ▪ Warning signs to be temporary placed on the roads for speed reduction due to transportation of electro parts and materials ▪ Distribution of printed documents to the relevant municipality offices (to designate the person responsible), local community offices, etc. 	In cases 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 AD 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 US/ Cases (e.g., COVID 19)
				<ul style="list-style-type: none"> No roads will be rehabilitated. However, warning signs could be placed at important congested traffic. 	
Construction phase (2023/2024)					
All stakeholders	<p><u>Placement of bulletin boards on the entrance of the sites for Bitola 2 and Bitola 3</u></p> <p>The bulletin boards are going to be installed at the beginning of the construction works and will be maintained throughout the construction phase. Project-related information is also announced through placement of information notices/leaflets on the subject bulletin boards in all municipalities concerned.</p>	ESM and Contractor	<p>Throughout the construction phase; On-demand and in accordance with project progress</p>	<ul style="list-style-type: none"> Placement of project-related announcements and relevant information on the bulletin boards in the project area (on the entrance of the PVPPs) Review and update of the information available at bulletin boards at least once per month 	<p>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.</p>
All stakeholders	<p><u>Placement of grievance boxes in the project area for workers and local community members (on the entrance of the sites for Bitola 2 and Bitola 3)</u></p> <p>Grievance boxes will be placed at the entrance of the sites of Bitola 2 and Bitola 3, 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 boxes will be checked by the Contractor on a weekly basis, and the grievances will be delivered to AD ESM for further action.</p> <p>Grievances may also be submitted via email, post or online and they will be available at AD ESM and project-affected municipalities' websites.</p>	ESM and Contractor	<p>At the time of commencement of construction works.</p>	<p>Grievance boxes and dissemination of information leaflets to the local communities.</p>	<p>Grievances may also be submitted via email, post or online and they will be available at AD ESM and project-affected municipalities' websites.</p>
All stakeholders	<p><u>Dissemination of information about organization of traffic during construction phase</u></p> <p>All stakeholders shall be regularly informed about the planned changes to the traffic schedule (e.g., potential interruptions of traffic due to construction). Announcements shall be provided by AD ESM, in cooperation with the Contractor, and they shall be disseminated through the local media.</p>	ESM and Contractor	<p>Continuously throughout the construction phase</p>	<p>Announcements in the local media, e.g., radio, TV, newspaper, online news portals, AD ESM website.</p>	<p>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.</p>

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to US/ Cases (e.g., COVID 19)
Local communities	<p><u>Meetings with project stakeholders</u></p> <p>AD ESM will organize regular meetings with local communities during the construction phase. These meetings will be attended by representatives of AD ESM, project-affected municipalities and the contractor. Meeting minutes shall be prepared and disseminated among the stakeholders.</p>	AD ESM and Contractor	Regular and on as per needed bases throughout the construction phase	Information about the location and time of public consultation meetings will be posted at AD 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.	AD ESM will continuously monitor the proposed COVID-19 prevention measures and will organize the meetings accordingly. If public consultation meetings are not allowed during the construction phase, alternative approaches shall include online meetings and phone communication with the relevant local and national NGOs and civil society organizations.
Local and national government stakeholders: MEPSO; MoEPP; Public Services Providers	<p><u>Meetings with local and national authorities, public services/infrastructure service providers</u></p> <p>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. Meeting minutes shall be prepared and disseminated among the stakeholders.</p>	AD ESM and Contractor	Quarterly throughout the construction phase	Communication via official correspondence, via e-mail and/or phone.	AD ESM will continuously monitor the proposed COVID-19 prevention measures and will organize meetings accordingly. If public consultation meetings would not be allowed during the construction phase, alternative approaches will include online meetings and phone communication with the relevant institutions.
NGOs and civil society organizations	<p><u>Meetings with NGOs and civil society organizations</u></p> <p>NGOs and civil society organizations will be consulted continuously, whereby they will be invited to meetings with the local communities, while additional targeted meetings will be organized with these stakeholders at least once per year during the construction phase. Meeting minutes will be prepared and disseminated among the relevant stakeholders.</p>	AD ESM and Contractor	Annually during construction phase	Official invitations to meetings via e-mail and announcements in the local media.	AD ESM will continuously monitor the proposed COVID-19 prevention measures and will organize the meetings accordingly. If public consultation meetings will not be allowed during the construction phase, alternative approaches will include online meetings and phone communication with the relevant local and national NGOs and civil society organizations.

Stakeholder	Activity	Responsibility	Frequency / timeframe	Information dissemination	Alternative approach due to US/ Cases (e.g., COVID 19)
The media	<p><u>Regular briefing about project activities and project updates</u></p> <p>AD ESM should regularly provide information to the local and national media about the relevant project updates so that all the stakeholders are duly informed in a timely manner about all project activities. AD ESM and the contractor will provide the local media with all the relevant project updates.</p>	AD ESM and Contractor	Continuously throughout the construction 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.
Operation phase (2024 or 2025)					
All local stakeholders	<p><u>Public consultation meeting regarding project closure and project feedback</u></p> <p>A final meeting will be organized with all local stakeholders in order to inform them about the finalization of construction works and the plans for future operation of the constructed PVPPs. In addition, this meeting will aim to get feedback regarding the constructed PVPPs and address any potential outstanding questions.</p>	AD ESM, project-affected municipalities	After completion of the construction phase	Information about the location and time of the public consultation meeting will be posted at ESM's website and at the websites of all projects 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 organize the meetings accordingly. If public consultation meetings are not allowed during the operation phase, alternative approaches shall include online meetings and phone communication with the relevant stakeholders.
Local and national media	<p><u>Public announcements</u></p> <p>Public announcements about the completion of works and operation of the constructed PVPPs will be communicated by the contractor and ESM through the local and national media (i.e., radio, TV, newspaper, online portals, etc.)</p>	AD ESM and Contractor	After putting the constructed PVPPs into operation	Information about the completion of works and operation of the constructed PVPPs 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 Project Information Disclosure and Consultation

AD 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. The project documentation will be prepared in English and Macedonian, and it will be available upon their official approval by EDM and the KfW. Project-related information for persons with disabilities (mainly blind) will also be made accessible (e.g., as an NTS lecture available on the website of AD ESM). The draft version of the ESIA Study and other documents will be publicly disclosed on the website of AD ESM-PIU and on the websites of the project-affected municipalities and/or should be provided on as per request of stakeholders in the required format (e.g., hard copy). Documents will remain disclosed during a period of 30 days before the public consultation event. All affected and interested parties can submit a comment on the disclosed project documentation for the period of 30 days. During the public consultation event after the presentation of the main project activities and main findings from the ESIA, attending stakeholders can raise their comments/questions/suggestions and any concern about the project. After the public hearing and "no objection" by KfW Development Bank, a final version of ESIA and related documents (ESMP, ESAP, LRP) should be disclosed.

At least one public meeting with physical presence will be organized on the draft ESIA.

Details of the project information disclosure and consultations are provided also in the above Table 6.

AD ESM / PIU in cooperation with the officials of the affected municipality will define the date for public consultation. All stakeholders will be informed via public announcement in media on the time of the public consultation, with the following set of information:

- purpose of the public consultation
- exact time and date for the event
- availability of the disclosed draft documents for comments and
- possibility for submitting comments on the prepared documents by filling in the form for submitting comments and suggestions on the ESIA to the person responsible from the PIU.

The public disclosure package for the construction project will contain the following parts:

- A non-technical summary (NTS) as a short account of the project will provide a brief description of the project's main characteristics without technical data and information, expected risks and impacts identified, and proposed preventive and mitigation measures and monitoring activities.
- The results of the prepared Environmental and Social Impact Assessment (ESIA) Study with the SEP shall be presented within a concise study. ESIA will focus on the site-specific impacts and risk assessment and proposed respective mitigation measures.
- The project Grievance Redress Mechanism (GRM) to express concerns or comments they have about the project and find optimal ways to resolve disputes.
- The Livelihood Restoration Plan for project-affected people within the project sites. In fact, the land users or the herders who pasture their cattle within the borders of proposed project locations for PVPP Bitola 2 and PVPP Bitola 3 are identified in this plan. Livelihood Restoration Plan will provide an opportunity for them to prevent and mitigate potential adverse impacts.

6.2 Stakeholder engagement roles and responsibilities

AD ESM – PIU are responsible for implementation of this SEP. However, to implement the various activities envisaged in this SEP, the responsible persons from PIU will need to closely coordinate with the identified key stakeholders – national and local government departments, the supervision and ESIA/LRP consultants, affected municipality and affected settlements, etc. AD ESM – PIU shall report on the implementation of this SEP.

Table 7: Roles and Responsibility of Key Involved Parties in SEP implementation

Involved parties	Roles and Responsibilities
AD ESM – PIU Mr. Vladimir Popovski (Responsible person in PIU for the SEP) Phone: +389 2 3149246 E-mail: vladimir.popovski@elem.com.mk	<ul style="list-style-type: none">▪ Planning and implementation of the SEP;▪ Leading stakeholder engagement activities;▪ Management and resolution of grievances;▪ Coordination / supervision of contractors on SEP activities;▪ Monitoring and reporting.
Contractors/ Sub-contractors	<ul style="list-style-type: none">▪ The contractor shall be responsible for hiring an Environmental and Social Manager;▪ The Environmental and Social Manager is responsible for communication / cooperation with all the identified stakeholders in compliance with the project phases (pre-construction, construction, and operation phase) and project activities (defined in Table 5, column 2) in order to ensure and support their participation within the planning and implementation of the SEP;▪ Inform AD ESM – PIU of any issues related to their engagement with stakeholders;▪ Transmit and resolve the complaints caused by the construction activities in close cooperation with AD ESM-PIU;▪ Prepare, disclose, and implement various plans (e.g., Labour Management Plan, Community Health and Safety Plan, etc.)▪ Dissemination of the important information related to the construction activities (such as transportation of construction equipment, possible road closure and available alternatives, etc.);▪ The Contractor Environmental and Social Manager is responsible for reporting to the Investor/AD ESM.
Project Affected Municipality and local communities	<ul style="list-style-type: none">▪ Transfer received grievances to the AD ESM – PIU;▪ Make available the disclosed ESIA documents.

Project affected people will have the opportunity and role to lodge their grievances using the Grievance Redress Mechanism defined in this SEP and support the ESIA team to define the appropriate mitigation measures related to the land users.

6.3 Estimated Budget

AD ESM – PIU will set aside a budget for implementation of proposed SEP activities. The indicative budget for SEP implementation will include activities such as:

- Consultation activities, events, meetings, etc. (1.500 EU)
- Project Information Disclosure (500 EU);
- Project materials: leaflets, brochures, fact sheets etc. (1.200 EU)
- Grievance Redress Activities (1.000 EU)
- Monitoring of the implementation of SEP (1.100 EU).

An estimated budget of 5.300 EU will be allocated for the SEP implementation.

7 Grievance Redress Mechanism

A Project-Specific Grievance Redress Mechanism (GRM) has been designed in compliance with the World Bank's ESS10 requirements. Stakeholders and all citizens will be kept well informed about the project and will be able to submit their feedback, suggestions and/or complaints to improve the activities envisaged by the project. Grievance mechanism is one of the tools for monitoring the project implementation.

Communication materials, in a way that everyone can understand (e.g., GRM leaflet, posters) will be produced to help local residents familiarize themselves with the grievance redress channels and procedures. A brief GRM leaflet is developed (see appendix 3). Suggestion and complaint boxes will also be installed on both project sites. To capture and track grievances received under the project, a dedicated GRM Management Information System (including database/ register) is planned. The AD ESM-PIU website will include clear information on how feedback, questions, comments, concerns, and grievances can be electronically 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.

PIU within AD ESM will implement a GRM to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. The PIU will go through the following steps to deal with the grievances (Figure 12).

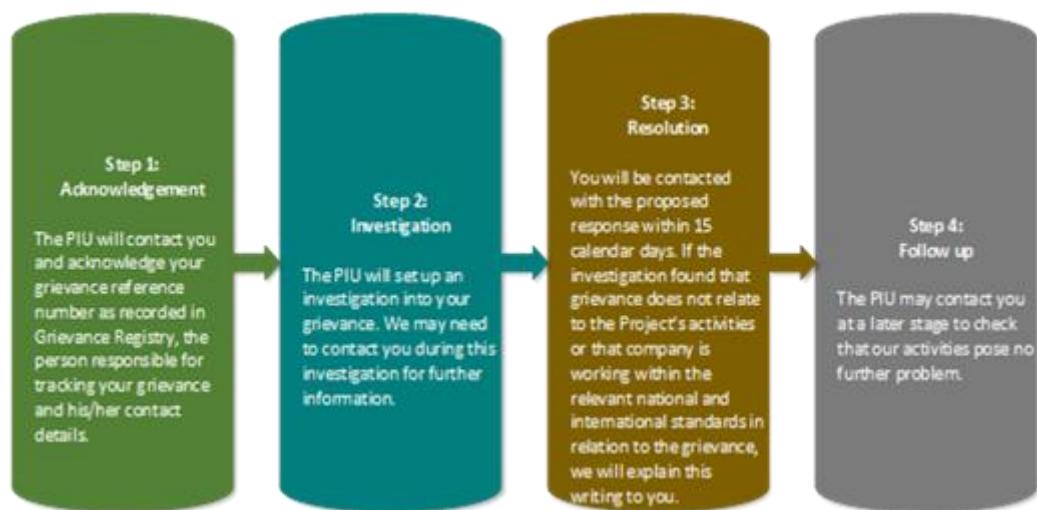


Figure 12: Flowchart for Processing Grievances

The construction phase will require two separate grievance mechanisms, one for internal parties and another for public or external parties. The grievance mechanism for internal parties is related to the workers. The worker's Grievance Mechanism will be established for the employees of Contractor/s and sub-Contractors and ESM workers who are currently working in the vicinity of project locations. During the construction phase, the grievance forms are going to be provided at the construction site, in hard copy. Grievance forms are going to be available at the construction camp, whereby this location shall be clearly marked so as to say, "Grievance Forms available here", whereby a grievance form box is going to be provided next to the copies of the grievance forms so that the stakeholders may be submit their grievances accordingly. The grievance form box could be put also in REK Bitola premises. The Contractor shall be obliged to put up the corresponding grievance box and signs on the construction site. The grievance mechanism for public or local community will be made available in hard copy at the local community's premises. All the interested stakeholders shall be duly informed about the availability of the

grievance mechanism, whereby ESM - PIU shall put up announcements (e.g., local community notice boards), whereby these announcements are going to provide all the relevant information necessary for submission of grievances, i.e., available resources, contact information, etc. All received comments and complaints will be forwarded and processed by the responsible person in AD ESM – PIU. The PIU shall be responsible for overall management of the GRM.

Specifically nominated and trained members of staff will record grievance information in a grievance log.

This will include:

- stakeholder name and contact details (if provided)
- details of the grievance and how and when it was submitted, acknowledged, responded to, and closed out.

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 includes 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.

Two forms are provided in the attachments (Appendix 1 Form for submitting comments and suggestions for ESIA, and Appendix 2 Public Grievance Form for whole project implementation period). The grievance forms are (going to be available) on the official website of the AD ESM "Elektrani na Severna Makedonija" (<https://www.esm.com.mk>) and relevant municipalities where the project activities will be implemented.

The project-affected municipalities (will) have available hard copies of the grievance forms so that the public may have direct access to them.

The interested and/or affected stakeholders will be duly informed about the availability of the grievance mechanism in a way that the PIU will put up announcements on both PVPP's information boards. These announcements provide all the relevant information necessary for submission of grievances, i.e., contact information, the deadlines, etc.

All stakeholders will be provided with a number of means for filing their grievances. The available grievance submission methods include email, online forms, grievance box at the construction site, and post. The grievances may be submitted anonymously, or they may be signed, and the complainants may provide all their relevant contact information in case they want to be contacted subsequently. All comments and complaints will be forwarded and processed by the person responsible for the PIU services, as shown in Table 8.

Table 8: Grievance mechanism contact information

AD Elektrani of North Macedonia (ESM) - Skopje
The Republic of North Macedonia
Project Implementation Unit (PIU)

Contact person for grievance mechanism
Mr. Vladimir Popovski
(Responsible person in PIU)
Phone: +389 2 3149246
E-mail: vladimir.popovski@elem.com.mk

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 related to the project will also be established.

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

All complaints received (regardless of whether they are received via grievance mechanism for internal or external parties) will be forwarded, registered, and processed by the responsible person in AD ESM – PIU. The grievance procedure will follow the following key steps:

1. The Grievance procedure starts with formal receiving, registering, and acknowledging of the grievance. The Grievance will be registered on the Grievance Form within three working days after its submission. If the grievance is not well understood or if additional data is required, clarification will be sought from the complainant during this step.
2. The analysis of the grievance received will be done within 15 working days together with the Contractor/s or Sub-Contractor/s and site visits/s performed. The PIU 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 providing the reason for rejection of the complaint and/or of the proposals. During that period, a detailed evaluation and investigation will be performed, with the purpose of determining the most suitable manner of responding to the received grievance. When informing the complainant, he will be provided with a detailed explanation of why his complaint was rejected.
3. In the third step, the proposed solution will be implemented as soon as possible, as an answer to the submitted complaint. The PIU person responsible will inform the complainant within 15 working days about the corrective solution performed. So, in total the 15 working days are needed from the register of the grievance till the closure of it.
4. After the completion of the grievance procedure, the grievance will be recorded in the form of Grievance log or Register. With the grievance recording in the Grievance log or Register, as well as submitting the grievance documentation about the applied corrective, the case will be closed.

The PIU will register all complaints in the Grievance log (see template of a Grievance log in Appendix 4) and monitor the entire process of comments and complaints. The information about the complaints and their processing and the results within the frame of regular (for instance, quarterly) reports will be provided through the website. The grievance procedure is shown in Figure 13 below:

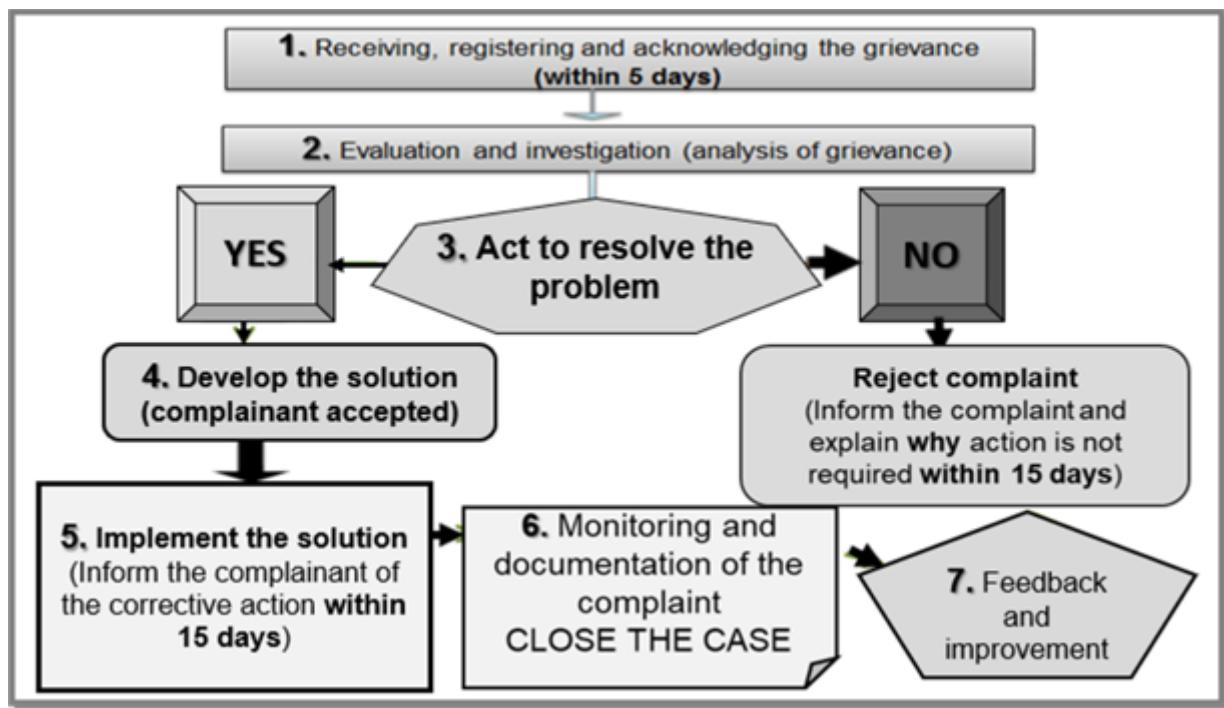


Figure 13: Grievance mechanism

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 issue raised through the GRM or if action is not required or measures cannot be carried out, it will provide a detailed explanation/ justification of why the problem could not be solved. The response should 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.

A Workers' Grievance Mechanism will also be established by Construction Contractor for the employees of the construction company/ies (as a separate system) to manage workplace-related complaints regarding health and safety, PPE, contractual issues, working hours, welfare facilities, etc. During the construction phase, the workers' grievance forms are going to be provided at the entrance of the PVPP's site office as hard copy, but also electronically at the developer's and the contractor's webpage. The contractor is obliged to set up the corresponding grievance box and signs on the construction site (e.g., project information boards, named "Bulletin boards").

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

A template for the grievance log may be found in Appendix 4. Summaries of complaints and the measures taken to resolve them shall be made public on a regular basis on the ESM website.

8 Monitoring and Reporting

Monitoring and reporting (M+R) represents crucial steps within the successful implementation and management process of any successful stakeholder engagement plan. M+R activities need to be carried out to ensure full compliance with all stakeholders' expectations and requirements, which do not insignificantly contribute to the successful implementation of the project. Correspondingly, ESM will be responsible for monitoring the implementation of all the stakeholder-related procedures and activities as defined by this SEP.

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 and workers' 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.

AD ESM will monitor the development of the intended stakeholder participation within the elaborated engagement schedule. Through evaluation of outcomes and effect of engagement, AD 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. AD 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, AD ESM will communicate with stakeholders and inform them of any significant issues, such as changes in the project program 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 monthly. The contractor will employ a person who is going to be responsible for managing the 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 AD 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 Table 9.

Table 9: Monitoring and Reporting Responsibility Matrix

Entity	Responsibility	Activity	Frequency
AD 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 the SEP.	Due 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 AD ESM about implementation of the SEP and any potential issues arising.	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 PVPP's entrance, or the site office (for workers), or online.	Providing the Investor with hard copies and/or scanned versions of the grievances submitted via the grievance box on site or online. The Contractor shall check the grievance box and email/online form on a daily basis.	Regularly, as soon as the grievances are received.

9 References

EIA Report (Elaborate) for construction of PVPP Bitola 2, 60 MW, GEING, 2022.

EIA Report (Elaborate) for construction of PVPP Bitola 3, 100 MW, GEING, 2022.

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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.

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

Appendices

Appendix 1: Form for Submitting Comments and Suggestions on ESIA Study

<p>Form for submitting comments and suggestions on the Environmental and Social Impact Assessment Study for the project <i>Construction of two photovoltaic power plants (PVPPs) of 60 MW and 100 MW in the region of Bitola</i></p>	
<p>Short description of the project</p> <p>Project activities for the <i>construction of two photovoltaic power plants (PVPPs) with an installed capacity of 60 MW and 100 MW</i> are planned to take place in the region of Bitola, within the borders of REK Bitola and a small part of state-owned land. The proposed sites for construction of two PVPPs (Bitola 2 and Bitola 3) form part of the waste rock material area operated by ESM. PVPP Bitola 2 has a site of 110 hectares with a perimeter of about 4.53 km. The proposed area for construction of PVPP Bitola 3 is 201 hectares with a perimeter of about 7.1 km.</p> <p>PVPP Bitola 2 is expected to have an average annual electricity production of ~ 96 GWh. The power plant will be connected to a 110 kV network owned by MEPSO through the existing SS Suvo Dol Mine. This project will avoid 67 M. ton/year of CO₂ emissions. The estimated average annual electricity production of PVPP Bitola 3 is expected to be 160 GWh, while the connection is planned to be made to SS MEPSO through the existing 110 kV transmission line. Construction of the proposed PVPPs Bitola 2 and Bitola 3 will significantly increase the share of renewable energy sources in the energy system of R. N. Macedonia.</p> <p>The project-affected municipality is the municipality of Novaci.</p> <p>An electronic version of the <i>Environmental and Social Impact Assessment for the project to construct two photovoltaic power plants (PVPPs) of 60 MW and 100 MW in the region of Bitola</i> is available on the following web pages:</p> <ul style="list-style-type: none">AD ESM https://www.esm.com.mk/Municipality of Novaci https://www.opstinanovaci.gov.mkMinistry of Environment and Physical Planning (MoEPP) https://www.moepp.gov.mk	
Name and surname of the person who provides comment*	
Contact information*	<p>E-mail: _____</p> <p>Phone: _____</p>
<p>Comment on the ESIA Study:</p>	
Signature	Date
<p>If you have any comments/suggestions or amendments to the proposed measures of the Environmental and Social Impact Assessment for the project "Construction of two photovoltaic power plants (PVPPs) of 60 MW and 100 MW in the region of Bitola, including Solar Measuring Campaign and Environmental and Social Impact Assessment", please submit it to the responsible persons from the following institution:</p> <p>Contact person from AD ESM: Mr. Vladimir Popovski e-mail: vladimir.popovski@elem.com.mk</p> <p>Contact person from the Municipality of Novaci: Mrs. Letka Jovanovska e-mail: letka.jovanovska@opstinanovaci.gov.mk</p> <p>Contact person from MoEPP: Mrs. Biljana Petkoska e-mail: b.petkoska@moepp.gov.mk</p>	
<p>Within the 14-day period after announcement of the ESIA for the project "Construction of two photovoltaic power plants (PVPPs) of 60 MW and 100 MW in the region of Bitola",</p>	
<p>(Date of announcement:</p>	
<p>Referent number: _____</p>	
<p>(Fulfilled by the responsible person for the project implementation)</p>	

* Fulfillment of the fields with personal data is not obligatory

Appendix 2: Public Grievance Form for Whole Project Implementation Period

GRIEVANCE FORM	
<i>Data lodged:</i> <hr/>	
<i>Remarks:</i> <hr/>	
<i>Preferred language for communication:</i>	
<i>Information about the person submitting the grievance:</i>	<i>If you do not want to provide the information from 1-3, simply move on to the subject and explanation of the grievance</i>
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 grievance: <hr/> <i>Date:</i> <hr/> <i>Remarks:</i> <hr/>	<i>Please specify how you would like to be informed about the further course of the project:</i>
8. Processing of the grievance	
9. Administrative records:	
10. Reviewed (date, responsible party/person):	
11. Answered (date, responsible party/person, and archive number):	

Appendix 3: Public Grievance Leaflet

Public Grievance Leaflet

In order to support the Government of North Macedonia's energy decarbonization targets by contributing an estimated carbon reduction and increasing the electricity production by renewable sources, AD ESM – Skopje (ESM) plans to establish two Photovoltaic Power Plants (PVPPs) in the region of Bitola, in the municipality of Novaci, with an installed capacity of 60 MW (Bitola 2) and 100 MW (Bitola 3).

What kind of grievance can I submit?

Anyone can submit a grievance if they feel that Project activities are negatively affecting them, their community, or their local environment. Examples of grievances could include, but are not limited to:

- Increased noise, access issues or other irritations during construction works or operation;
- Concerns regarding community health and safety, such as increased heavy traffic on local roads, local road damage or inadequate management of waste during construction works;
- Concerns about the environment;
- Practices that endanger the health, safety and security of employees working on the Project;
- Inadequate implementation of the Project's Stakeholder Engagement Plan by the Company.

How can I submit a grievance?

Anyone can submit a grievance to the Company (contact information given below) or the Contractor without any costs incurred to the complainant, in the following ways:

- a. vocally (in person or by telephone)
- b. in written form by filling in the attached Project Grievance Form or in other form if preferred, and sending it by personal delivery, post, fax, or e-mail

Contact information:

AD Elektrani of North Macedonia (ESM) – Skopje
Project Implementation Unit (PIU)
Address: Str. 11. October 9, 1000 Skopje

Contact person: Mr. Vladimir Popovski

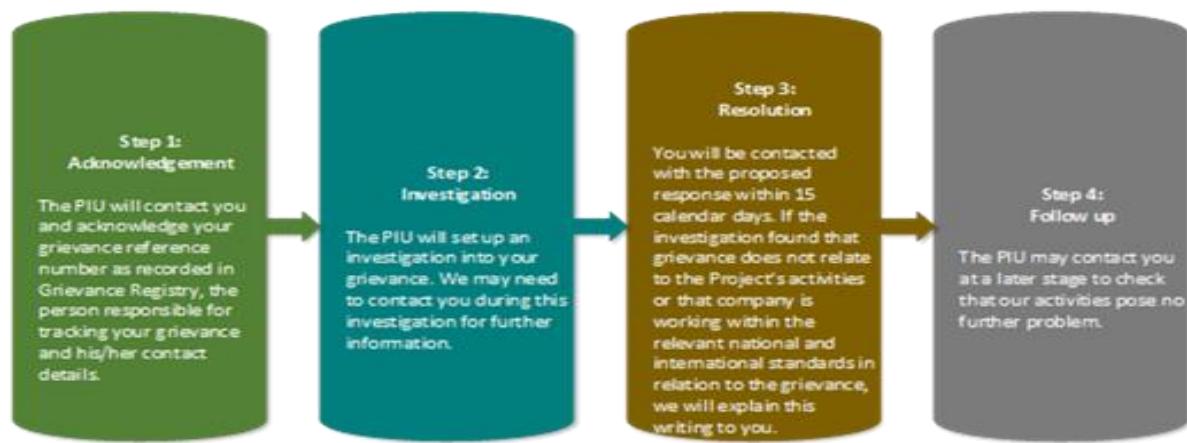
Tel: + 389 2 3149246/ E-mail: vladimir.popovski@elem.com.mk

Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, the Company will ensure that your name and contact details are not disclosed without your consent and only the Company team directly working on the investigation of your complaint will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

Flowchart for Processing Grievances

How will ESM deal with my grievance?

The Company will go through the following steps to deal with your grievance:



Appendix 4: Grievance Log Template

Appendix 5: NGOs and Civil Organizations

NGOs and Civil Organizations	Contact Information
Macedonian Ecological Society (MES)	Address: Archimedes No. 5 1000 Skopje The Republic of Northern Macedonia Tel: (02) 2402 773, Fax: (02)2402 774 Mob: 078 393 436 contact@mes.org.mk
The Ecologists' Movement of Macedonia (DEM) – Skopje	Vasil Gorgov 39, Shed 6, 1000 Skopje Tel: (02) 3220-520 dem@dem.org.mk ruska@dem.org.mk
Centre for environmental research and information "Eko-svest" – Skopje	Blvd 11 Oktomvri 125/12, 1000 Skopje tel: (02) 3217-247 fax: (02) 3217-246 mob: 072 726-104 info@ekosvest.com.mk
Front 21/42	Orce Nikolov 83A, 1000 Skopje Tel/Fax: (02) 3122-546 mob: 075 433-231 contact@front.org.mk
Macedonian Green Centre	Kosta Novakovik 1A/19, 1000 Skopje Tel/Fax: (02) 6132-432 Mob : 078 205 217 zeleni@zeleni.org.mk
Bird Study and Protection Society of Macedonia	PMF - Gazi Baba BB, 1000 Skopje, 02/3117-055; 078/254-736 brankom@ukim.edu.mk
Owl Protection Association	Jurij Gagarin 28-5/3, 1000 Skopje 070/999-859 macedonian.owl.trust@gmail.com
NGO Geosphere – Bitola	Mr. Mite Ristov Mob: 078/233-622 Bitola
NGO Sfera International – Bitola	Mr. Milcho Duli Mob: 071/369-679 Bitola
Association for sustainable urban development - Bitola	Mrs. Anastasija Trajkovska, Vice President of NGO anridis@t-home.mk
Molika Bitola	Petar Andonov, President of the Ecological Association MOLIKA – Bitola Mob: 070/237-455
The Women's organization "Strength of Grandma"	Novaci

Appendix 6: Photo Log (Site Visit Photos taken by Fichtner/GEING Team)

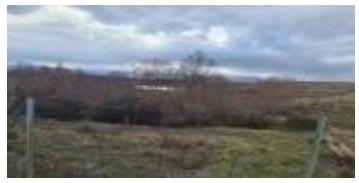
The project locations for construction of PVPPs Bitola 2 and Bitola 3



Appendix 7: Key Findings from the Stakeholder Meetings and Site Visit

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
12.12.2022	Meeting at the premises of REK Bitola	<p><u>Fichtner/GEING team:</u> Slavjanka Pejcinovska-Andonova - ESIA Expert</p> <p>Marija Nikoloska – Environmental Expert</p> <p>Jelena Sekulovska – Environmental Expert</p> <p>Zdravko Andonov – Energy Expert</p> <p>Vedran Andonov – Environmental and Energy Expert</p> <p>PhD. Ruzica Cacanoska - Social Expert</p> <p>Ivan Blaževski - Assistant of Social Expert</p> <p><u>REK Bitola Representative:</u> Atanas Tabakovski – Director of the Department for Investments and Development of REK Bitola</p>	<p>At the beginning of the meeting, all members of the project teams and their role within the project for construction of two photovoltaic power plants of 60 MW and 100 MW near REK Bitola were introduced. The type of project activities, as well as issues related to the project, were discussed:</p> <ul style="list-style-type: none"> ▪ Type of land and land ownership of the project locations ▪ Need of expropriation ▪ Location of transmission line which will provide grid connection of PV Plant Bitola 2 and PV Plant Bitola 3 ▪ Future planned projects (relevant for the project locations) according to the ESM Development Programs/Plans ▪ Surface water infrastructure (pond near Bitola 3) ▪ Qualitative analysis of waste rock material composition ▪ Presence of cultural heritage sites etc. ▪ Boundaries of project locations regarding boundaries of REK Bitola ▪ Possibility of construction of access roads to PV plants ▪ Capacity of PV plants <p>Mr. Tabakovski introduced himself and his role in REK Bitola. He pointed out:</p> <ul style="list-style-type: none"> ▪ the responsible person for environmental protection and OH&S, who together with the representatives from the Department for Investments will respond to all Experts' questions ▪ that around 2,200 employees work in REK Bitola (in the Thermal Power Plant and in the Mine) ▪ Mr. Dimitar Petkovski (Director of REK Mine) as a contact for issues related to water drainage and water collection facilities of the project area ▪ that all relevant issues and necessary data for the project that will be requested by the environmental/social expert team will be sent to them. 	 <p>Source: photos taken by Fichtner/GEING team during the meeting with Mr. Atanas Tabakovski</p>   <p>Source: photos taken of the surrounding of REK Bitola by Fichtner/GEING team during the site visit at the project locations</p>

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
			<p>After the meeting, the project teams defined the future activities:</p> <ul style="list-style-type: none"> ▪ Organizing virtual (zoom) meeting ▪ Establishing communication with Legal Department of REK Bitola for issues related to land ownership and acquisition ▪ Establishing communication with Mr. Dimitar Petkovski <p>and conducted a site visit of the relevant project locations.</p>	
Meeting at the premises of REK Bitola (Environmental and H&S Department)	<p><u>Fichtner /GEING team:</u> Slavjanka Pejcinovska-Andonova - ESIA Expert Marija Nikoloska – Environmental Expert</p> <p>Jelena Sekulovska - Biodiversity Expert</p> <p>Zdravko Andonov - Energy Expert Vedran Andonov – Environmental and Energy Expert PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski - Assistant of Social Expert</p> <p><u>REK Bitola Representatives:</u> Mr. Stojanovski Ljupco, Department for Development - Environmental Coordinator and responsible for Environmental Permit</p>	<p>At the beginning of the meeting, all members of the project teams and their role within the project for construction of two photovoltaic power plants of 60 MW and 100 MW near REK Bitola were introduced. The type of project activities, as well as issues related to the project, were discussed.</p> <p>The REK Bitola team introduced themselves and their responsibilities within REK Bitola. Mr. Stojanovski Ljupco started the discussion about:</p> <ul style="list-style-type: none"> ▪ Environmental Permit of REK Bitola ▪ Waste rock material composition (no analysis has been done and GEING will perform geological investigations) ▪ During the construction phase, the waste rock will be leveled and recultivated according to the Plan for recultivation ▪ REK Bitola has already recultivated areas near the Bitola 2 site ▪ Noise monitoring near REK Bitola (according to the latest permit for complying with an operational plan of REK Bitola) ▪ Location for planned regional waste landfill Meglenci ▪ Pointing out special service responsible for water drainage and water collection facilities of the project area ▪ Air quality and air emissions - performed according to the Environmental Permit ▪ Water for technical purposes in the technological process used from Strezevo accumulation ▪ Water emissions (monitoring is performed according to the Environmental Permit – e.g., measuring points at Novaci) ▪ Recertification for ISO 114001, ISO 45001 and ISO 9001 systems is done in September '22 	<p>a)</p>  <p>b)</p>  <p>c)</p> 	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
		<p>Ms. Natasha Popovska, Department for Development - Mechanical Engineer</p> <p>Mr. Zvonko Jovanoski, Department for technical safety (including OH&S and Environment)</p> <p>Mr. Ilija Dimovski, Department for technical safety (including OH&S and Environment)</p>	<ul style="list-style-type: none"> ▪ Department for technical safety (including OH&S and Environment) ▪ The boundaries with coordinates of REK Bitola (including the access roads) are presented in the Environmental Permit. <p>After the meeting, the Fichtner/GEING team defined the future activities:</p> <ul style="list-style-type: none"> ▪ Organizing a virtual (zoom) meeting ▪ Establishing communication with Julija Siljanovska (Environmental Engineer) from the Environmental Department of the Headquarters of ESM, for environmental issues ▪ Establishing communication with Mr. Dimitar Petkovski <p>and conducted a site visit of the relevant project locations to identify sensitive receptors.</p> <p>In future, REK Bitola should:</p> <ul style="list-style-type: none"> ▪ perform an energy audit and carbon footprint ▪ send to the environmental/social expert team all relevant issues and necessary data for the project requested by them ▪ send the results from the latest air emissions and air quality and water emission monitoring from 2022. 	 d)  e)  f)  g) 

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
				<p>Source: site visit photos:</p> <ul style="list-style-type: none"> b) at project location for PV Plant Bitola 2 and existing location of ash landfill c) taken between project location Bitola 2 and Bitola 3 site d) taken at project location Bitola 3 site e) taken along the existing access road to Bitola 3 site f) taken near Bitola 3 site (borders of mining area) and existing pond g) taken near and in the wider surroundings of the Bitola 3 site
Premises of the Municipality of Bitola	<u>Fichtner /GEING team:</u> Slavjanka Pejcinovska-Andonova - ESIA Expert Marija Nikoloska – Environmental Expert Jelena Sekulovska - Biodiversity Expert Zdravko Andonov - Energy Expert Vedran Andonov – Environmental and Energy Expert PhD. Ruzica Cacanoska - Social Expert	<p>Before the meeting, the environmental/social expert team performed a site visit at the project locations for PV Plants Bitola 2 and Bitola 3. During the meeting, there was a discussion among all participants on the following project issues:</p> <ul style="list-style-type: none"> ▪ Type of land and land ownership of the project locations ▪ Future planned projects (relevant for the project locations) according to the ESM Development Programs/Plans, ▪ Future planned project related to energy efficiency of the Municipality of Bitola, etc. <p>The Municipality of Bitola representative explained and pointed out:</p> <ul style="list-style-type: none"> ▪ several projects and collaborations with international institutions and associations ▪ the Municipality's involvement in projects for Energy Transition and the 10-year transition plan ▪ the need to have an appropriate strategy for the workers in the period of Energy Transition 	  	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
		<p>Ivan Blaževski - Assistant of Social Expert</p> <p><u>Municipality of Bitola representative:</u></p> <p>Mr. Goran Nedelkov - Energy Efficiency Adviser at Municipality of Bitola</p>	<ul style="list-style-type: none"> the successful international, cross-border cooperation with the Republic of Greece the commitment to support the project by providing appropriate documents and information from the Municipality of Bitola that are needed for the development of the project documentation for the construction of the photovoltaics in REK Bitola. <p>As future activities related to the project, the Fichtner/GEING team will: establish communication with relevant stakeholders during the project implementation.</p>	Source: photo taken by Fichtner/GEING team during the meeting in the Municipality of Bitola
Premises of the NGO Sphere International in Bitola		<p><u>Fichtner/GEING team</u></p> <p>PhD. Ruzica Cacanoska - Social Expert</p> <p>Ivan Blaževski - Social Expert</p> <p><u>Representatives of the local NGOs:</u></p> <p>Mr. Mite Ristov, NGO Geosphere – Bitola</p> <p>Mr. Milcho Duli, NGO Sfera International – Bitola</p> <p>Mrs. Anastasija Trajkovska, Vice President of NGO – Association for sustainable urban development - Bitola</p>	<p>At the beginning of the meeting, Ms. Ruzica Cacanoska introduced her team and her role for the project for "Construction of two photovoltaic power plants of 60 MW and 100 MW near REK Bitola". The Bitola NGO representatives expressed general support for the project implementation, but also a big concern related to:</p> <ul style="list-style-type: none"> the operation of PVPP Bitola 2 because the dust from the coal mine will seriously affect the work of the installed photovoltaics suitability of the project location the amounts of waste following the decommissioning phase capacity and activity of the Municipality of Novaci to cover issues related to the environment insufficient residents' awareness about the construction of the landfill in the Municipality of Novaci non-existent environmental inspector in the Municipality of Novaci and only one in the Municipality of Bitola. <p>Future project activities: The NGO representatives will be invited during the Public Hearing events organized for presentation of key aspects of the FS and ESIA study for both sub-projects.</p>	

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
13.12.2022	Premises of the Municipality of Mogila	<u>Fichtner/GEING team</u> PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski (Assistant of Social Expert) <u>Municipality of Mogila representative</u> Draganco Sabotkovski – Mayor of the Municipality of Mogila	<p>At the beginning of the meeting, Mr. Draganco Sabotkovski introduced himself as Mayor of the Municipality of Mogila. He underlined:</p> <ul style="list-style-type: none"> ▪ the existence of large clouds of dust when there is a southerly wind in the populated areas near the Thermal Power Plant Bitola ▪ the increasing number of deaths from cancer in the region ▪ that environmental pollution greatly affects the quality of agricultural products grown in Mogila Municipality ▪ the social moment connected with the dismissal of workers from the Mine and Thermal Power Plant (REK Bitola) ▪ that there is a coal deposit in the locality of Moino. <p>As future activities related to the project, it has been agreed that the Municipality will submit appropriate documents in an electronic version in the shortest period of time possible, including:</p> <ul style="list-style-type: none"> ▪ LEAP ▪ Annual report for the Public Utility Company of the municipality ▪ Annual waste management program ▪ Study/Analysis of the air quality situation within a project ▪ Report on implemented action programs and strategies ▪ Strategy for climate action ▪ Study on valorization/revalorization of flora and fauna ▪ Monitoring report (conducted by MES or other organization) for flora or fauna (e.g., birds) in the Municipality or region ▪ Initiative to declare some protected areas ▪ Complaints from citizens related to the operation of REK Bitola, regarding the environment (air, water, etc.) ▪ Strategy for local economic development ▪ Strategy for the development of tourism ▪ Strategy for youth, gender equality, etc. 	 <p>Source: photo taken by Fichtner/GEING team during the meeting in the Municipality of Mogila</p> 

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
	Premises of the Municipality of Novaci	<p><u>Fichtner/GEING team</u> PhD. Ruzica Cacanoska - Social Expert Ivan Blaževski (Assistant of Social Expert)</p> <p><u>Municipality of Novaci representatives:</u> Mr. Stevche Stevanovski - Mayor of the Municipality of Novaci Mrs. Ljiljana Najdovska - Councilor in the Municipality of Novaci Mrs. Letka Jovanovska - Head of the Department for communal activities, traffic, urban planning and environmental protection and local economic development</p>	<p>During the meeting, the attendees expressed dissatisfaction and concern regarding:</p> <ul style="list-style-type: none"> ▪ the monitoring of the pollution in the Municipality of Novaci, especially with the excessive amount of dust ▪ the usage of the regional road R1311 (the frequent use of the regional road will lead to traffic congestion and its damage) ▪ the transportation of imported coal from Greece through this road in trucks without cover. <p>The attendees emphasized that there is the need to apply effective solutions to combat dust. The solutions are extremely important for the periods of installation and usage of installed photovoltaic devices. The mayor put an accent on the social moment connected with the dismissal of workers and the importance of a plan for energy transition related to the workers. Also, he expressed dissatisfaction with the payment of the concession.</p> <p>As future activities related to the project, it has been agreed that the Municipality will submit appropriate documents in an electronic version in the shortest period of time possible, including:</p> <ul style="list-style-type: none"> ▪ LEAP ▪ Annual report for the Public Utility Company of the municipality ▪ Annual waste management program ▪ Study/Analysis of the air quality situation within a project ▪ Report on implemented action programs and strategies ▪ Strategy for climate action ▪ Study on valorization/revalorization of flora and fauna ▪ Monitoring report (conducted by MES or other organization) for flora or fauna (e.g., birds) in the Municipality or region ▪ Initiative to declare some protected areas ▪ Complaints from citizens related to the operation of REK Bitola, regarding the environment (air, water, etc.) ▪ Strategy for local economic development ▪ Strategy for the development of tourism ▪ Strategy for youth, gender equality, etc. 	   <p>Source: photo taken by Fichtner/GEING team during the meeting in the Municipality of Novaci</p>

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
17.02.2023	Premises of AD ESM Skopje	<u>Fichtner/GEING team</u> Slavjanka Pejcinovska-Andonova - ESIA Expert PhD. Ruzica Cacanoska - Social Expert Dragan Djordjevic, Mech. Eng., Deputy Manager of Design Division <u>AD ESM:</u> Mr. Zvonko Kuskovski – Head of the Department for Investments Mr. Vladimir Popovski - Department for Development and Investments Mrs. Julija Vrtova Simjanovska, M.Sc. Environmental Specialist Department for Development and Investments	<p>Mr. Kuskovski, Mr. Popovski, and Ms. Simjanovska explained the key points related to the necessary project information and documentation. Ms. Simjanovska was focused on the list that the FICHTNER / GEING team submitted to AD ESM. She explained that they will send the available documentation via email. She mentioned that they will send the following required information and documents for the Scoping Report and ESIA Study for PVPP Bitola 2 and 3:</p> <ul style="list-style-type: none"> ▪ Link for Integrated Environmental Permit: https://www.moepp.gov.mk/wp-content/uploads/2022/03/Final TPP REK A IPPC BT..pdf ▪ Reports from air emissions and air quality monitoring at all monitoring points in 2022 from the REK Bitola installation. ▪ Surface water quality measurements performed in 2022. ▪ Information that the noise measurements will be carried out during 2023. In the previous period of 10 years, no noise measurements were performed. ▪ Recultivation Plan. <p>She noted that they had no obligation to measure the quality of soil.</p> <p>Regarding the conversion of land, Mr. Kuskovski explained the different procedures (legislative) or distinction between the company and state-owned land. He referred to Article 54, paragraph 4 of the Law on Urban Planning. Also, he mentioned the Law on construction land (Article 19) in context to obtain a long-term lease of land in state ownership. Mr. Kuskovski informed the attendees with the actual situation related to the feasibility studies for Bitola 2 and Bitola 3 and their expectations related to the procedure connected with the Urban plan (discussing the prepared proposed layouts, transmission line, transformers, etc.).</p> <p>Mr. Kuskovski introduced the attendees to the process of determination of the need for a Strategic Environmental Assessment (SEA). He conveyed in detail their experience with the project documentation related to the</p>	  <p>Source: photo taken by Fichtner/GEING team during the meeting</p>

Date	Institution / Location	Involved Parties / Attendees	Notes	Photo documentation
			<p>construction of PV Bitola 1. He concluded that for similar projects they were released from the obligation to prepare an SEA.</p> <p>Regarding selection of the final option of the project locations for construction of Bitola 2 and Bitola 3, Mr. Kuskovski explained that they applied multi-criteria analysis.</p> <p>The attendees discussed the available data and information related to the drainage of the project locations of Bitola 2 and Bitola 3.</p> <p>As future activities related to the project, it has been agreed that the representatives from AD ESM will submit all available documents and information in an electronic version in the shortest period of time possible.</p> <p>They will ask the colleagues from REK Bitola to provide them with the drainage scheme for project locations of Bitola 2 and Bitola 3 and to forward it to Fichtner / GEING team.</p>	



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