# Stakeholder Engagement Plan (SEP)

**ESIA of Blue 2, Blue 3 and Detailed Design Engineering for the 10 MW/26.75 MWh and 30MW/80.25 MWh BESS**

February 2026

Tirana, Albania

## REPORT SUMMARY

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|---|---|
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| DOCUMENT TITLE | Stakeholder Engagement Plan (Updated) |

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## FINAL PURPOSE OF ISSUE

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## Contents

## Figures



## Tables

## Abbreviations

| | |
|---|---|
| AC | Alternating Current |
| AU | Administrative Unit |
| BESS | Battery Energy Storage System |
| DC | Direct Current |
| DCM | Decision of Council of Ministers |
| EBRD | European Bank for Reconstruction and Development |
| EIA | Environmental Impact Assessment |
| ESIA | Environmental and Social Impact Assessment |
| ESP | EBRD Environmental and Social Policy |
| ESR | EBRD Environmental and Social Requirement |
| GM | Grievance Mechanism |
| KPI | Key Performance Indicator |
| MEI | Ministry of Energy and Infrastructure |
| MW | Megawatt |
| NGO | Non-Governmental Organization |
| OHL | Overhead Line |
| PV | Photovoltaic (solar power) |
| SCADA | Supervisory Control and Data Acquisition |
| SEP | Stakeholder Engagement Plan |
| SPV | Special Purpose Vehicle |
| TAP | Trans Adriatic Pipeline |

# 1. Introduction

This document constitutes the Stakeholder Engagement Plan (SEP) for the Blue 2 and Blue 3 photovoltaic power plants and the associated Battery Energy Storage System (BESS) facilities, which are being developed within the same geographic area in the Municipality of Fier, in the Seman–Sheq Marinas–Topojë area of Albania. As the projects are located in close proximity and are being implemented under the same financing framework, stakeholder engagement activities are planned and coordinated in an integrated manner to ensure consistency, efficiency, and clarity in communication with affected communities and other interested parties.

The SEP has been prepared in accordance with the requirements of the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (ESP), October 2024, with specific reference to Environmental and Social Requirement 10 (ESR10) on Stakeholder Engagement. ESR 10 requires project sponsors to identify and analyse stakeholders, disclose relevant and timely information, conduct meaningful and inclusive consultations, and establish and maintain a grievance mechanism to receive and address concerns raised by project-affected people and other interested parties.

In addition, the SEP integrates the applicable legal and regulatory framework of the Republic of Albania, in particular the requirements related to public information and consultation under Law No. 10440/2011 "On Environmental Impact Assessment," as amended, and relevant secondary legislation governing public participation, disclosure of environmental information, and consultation with affected communities during environmental assessment and permitting procedures.

This SEP sets out the procedures and methods that will be applied to identify stakeholders, disclose information, and implement engagement activities throughout the lifecycle of the projects, including the pre-construction, construction, operation, and decommissioning phases. The Plan also establishes the framework for ongoing communication, documentation of engagement activities, and periodic review to ensure that stakeholder engagement remains effective and proportionate to the nature and scale of the projects and their potential environmental and social risks and impacts.

## 1.1. Purpose of the Stakeholder Engagement Plan

The projects are located within the same geographic zone and share similar environmental and social conditions, as well as a common group of stakeholders including nearby land users, local authorities and infrastructure operators. The inclusion of Blue 2, Blue 3 and associated BESS facilities within a single SEP ensures that:

- Stakeholder identification and engagement activities are coordinated.
- Information disclosure is consistent across projects.
- Potential cumulative concerns raised by stakeholders can be addressed in an integrated manner.
- Grievance management procedures apply uniformly to all project components.

The purpose of this SEP is to:

- Ensure timely, transparent and culturally appropriate disclosure of information regarding the Project.
- Establish a systematic approach to stakeholder engagement and consultation.
- Identify stakeholders and understand their interests, expectations and concerns.

- Promote constructive and responsive relationships with project-affected communities and other interested parties.
- Provide accessible and effective means for stakeholders to raise concerns and grievances.
- Support the management of environmental and social risks and impacts through ongoing dialogue.

For stakeholder engagement purposes, the key issues of interest are expected to include:

- Construction traffic and temporary disturbance.
- Employment opportunities.
- Land use and access.
- Visual impacts.
- Noise during construction.
- Community health and safety.
- Grievance mechanisms and communication channels.
- Operational impacts are expected to be limited and localized.

Stakeholder engagement is considered an ongoing process that will continue throughout the Project lifecycle.

## 1.2. Projects Overview

The projects covered by this Stakeholder Engagement Plan (SEP) include the development of two solar photovoltaic (PV) power plants, Blue 2 and Blue 3, together with a Battery Energy Storage System (BESS) facility, all located within the same project area in Topojë Administrative Unt of the Fier Municipality.

The facilities are planned as part of an integrated renewable energy development and will be technically interconnected through shared electrical infrastructure, including substations and grid connection systems. Although implemented as distinct components, the plants and BESS installations will operate in a coordinated manner and are therefore considered collectively for the purposes of stakeholder engagement and environmental and social assessment.

The Project aims to:

- increase electricity generation from renewable energy sources.
- support diversification of Albania's energy mix.
- improve grid stability through energy storage capacity.
- contribute to the reduction of greenhouse gas emissions.
- support national energy and climate objectives.

The selected sites are located on land with limited agricultural productivity and have been chosen to minimise environmental and social impacts, including avoiding settlements, sensitive habitats, and protected areas to the extent practicable.

## 1.3. Regulatory and Policy Framework

This Stakeholder Engagement Plan (SEP) has been prepared in accordance with:

- EBRD Environmental and Social Policy (October 2024).

- Applicable national legislation of Albania relating to environmental assessment, public consultation, and information disclosure.
- International good practice for stakeholder engagement in infrastructure and energy projects.

### 1.4. Principles of Stakeholder Engagement

Stakeholder engagement activities for the Project will be guided by the following principles:

- Transparency and accountability in communication.
- Timely and accessible disclosure of information.
- Inclusiveness and non-discrimination.
- Consideration of vulnerable or disadvantaged groups.
- Two-way communication and responsiveness to stakeholder feedback.
- Documentation and monitoring of engagement activities.

### 1.5. Structure of the Document

This Stakeholder Engagement Plan is structured as follows:

- Applicable International Standards and the National Regulatory Framework.
- Project description and area of influence.
- Identification and analysis of stakeholders.
- Stakeholder engagement program and consultation methods.
- Grievance mechanism.
- Monitoring and reporting arrangements.
- Roles and responsibilities for implementation.

## 2. Applicable International Standards and the National Regulatory Framework

### 2.1. International Requirements

The SEP has been developed in line with the EBRD Environmental and Social Policy (October 2024) and the relevant Environmental and Social Requirements (ESRs), in particular:

- **Environmental and Social Requirement (ESR) 10:** Stakeholder Engagement, which requires the identification of stakeholders, timely disclosure of relevant project information, meaningful consultation, inclusive engagement of vulnerable or disadvantaged groups, establishment of a grievance mechanism, and ongoing engagement throughout the project lifecycle.
- **Environmental and Social Requirement (ESR) 1:** Assessment and Management of Environmental and Social Risks and Impacts, which requires stakeholder engagement to be integrated into the environmental and social assessment process and environmental and social management systems.

- **Environmental and Social Requirement (ESR) 5:** Land acquisition, restrictions on land use and involuntary resettlement is applicable to the Project, as land required for the photovoltaic plant has been secured through a combination of private land purchase and lease arrangements, together with the leasing of a limited area of municipal land. In accordance with ESR5. Based on cadastral verification, field surveys, and stakeholder consultations, no physical displacement has occurred, and no significant economic displacement has been identified. The parcels acquired for the Project were largely degraded and not actively cultivated due to limited irrigation and soil salinity, and surrounding agricultural activities and access routes remain unaffected. Transactions with private landowners were conducted on a voluntary basis, and the allocation of municipal land was formalised through the relevant administrative procedures. Given the absence of displacement and the limited nature of impacts, the requirements of ESR5 are addressed through documented land acquisition records, stakeholder engagement, and the establishment of a grievance mechanism, rather than through the preparation of a Resettlement Action Plan or Livelihood Restoration Plan. The overall land acquisition risk is therefore considered low, and compliance with ESR5 is achieved through monitoring measures implemented as part of the Project's environmental and social management system.
- **Environmental and Social Requirement ESR 4:** Health, Safety and Security. Transport of materials and equipment will take place along existing public roads, including sections where sensitive receptors are located along the main road. Potential risks to community health and safety may include increased traffic, noise, dust, and temporary disturbance. In line with ESR 4, stakeholders located along transport routes, including residents, businesses, and local authorities, will be informed in advance of transport activities where relevant, and any concerns related to traffic safety or disturbance will be addressed through the Project grievance mechanism and ongoing consultation.
- **Environmental and Social Requirement ESR 8:** Cultural Heritage. Transport activities will take place along existing public roads that may pass near areas of cultural or historical value. Although no direct impacts on known cultural heritage sites are anticipated, there remains a potential risk of disturbance, accidental damage, or chance finds during any associated works or temporary interventions. In line with ESR 8, relevant stakeholders, including local authorities and cultural heritage institutions where applicable, will be informed of Project activities, and a chance-find procedure will be implemented. Any concerns raised by communities or authorities regarding potential impacts on cultural heritage will be addressed through the stakeholder engagement process and the Project grievance mechanism.

## 2.2. National Legislative Framework

In Albania, stakeholder engagement for projects subject to a Preliminary Environmental Impact Assessment (Preliminary EIA) is governed primarily by Law No. 10440/2011 "On Environmental Impact Assessment", as amended, and its implementing decisions, including DCM No. 686/2015, as amended, and DCM No. 247/2014 on informing and involving the public in environmental decision-making.

Under the Preliminary EIA procedure, the developer is required to disclose basic project information and notify the public and relevant institutions at the early stages of the assessment. The National Environmental Agency and the relevant local authorities make project information available for review, enabling interested parties to submit comments or observations within the prescribed review period. Municipalities and other competent institutions are formally consulted as part of the evaluation process and may provide technical opinions or raise local concerns that must be considered in the environmental decision.

Although public hearings are not systematically mandatory for Preliminary EIA procedures, the competent authority may request additional consultation where the nature of the project, the sensitivity of the location, or the level of public interest justifies further engagement. Stakeholder comments received during the review process are documented and taken into account by the competent authority when determining whether the project can proceed, requires additional mitigation measures, or should be subject to a full EIA procedure.

These national requirements are complemented, where applicable, by international lender standards, which typically require more structured and continuous stakeholder engagement, including the preparation of a Stakeholder Engagement Plan, ongoing disclosure of information, and the establishment of a grievance mechanism throughout the project lifecycle.

## 2.3. Application for this SEP

This SEP has been prepared to meet both EBRD requirements and Albanian legal obligations. Where differences exist, the approach adopted follows the more stringent requirement, particularly in relation to early engagement, continuous consultation, inclusion of vulnerable groups, documentation of engagement activities, and operation of a project grievance mechanism throughout the project lifecycle.

The table below presents a gap analysis comparing the requirements of EBRD Environmental and Social Policy (2024), specifically Environmental and Social Requirement 10, with current Albanian regulatory requirements and practices.

**Table 1 Gap Analysis, EBRD Environmental and Social Policy 2024 ESR 10 vs Albanian regulatory practices**

| Topic | EBRD Requirement (ESR10 reference) | Albanian Requirement / Practice (Preliminary EIA) | Gap Identified from an EBRD Perspective | Actions Required for Alignment with ESR10 | Status |
|---|---|---|---|---|---|
| **Scope of stakeholder engagement** | Engagement must begin early and continue throughout the project lifecycle, proportionate to risks and impacts. | Stakeholder engagement mainly occurs during the Preliminary EIA notification and review period; no requirement for continued engagement after permitting. | Engagement under national procedures is limited in duration and does not cover the full project lifecycle. | Implement engagement throughout design, construction and operation as defined in the SEP. | SEP prepared |
| **Stakeholder identification** | Stakeholders must be systematically identified and documented. | Stakeholders identified primarily through notification procedures and consultation with local authorities | Identification may focus on institutions and nearby residents, with limited systematic mapping or documentation of | Maintain structured stakeholder mapping and update periodically. | Stakeholder mapping prepared and updated |

| Topic | EBRD Requirement (ESR10 reference) | Albanian Requirement / Practice (Preliminary EIA) | Gap Identified from an EBRD Perspective | Actions Required for Alignment with ESR10 | Status |
|---|---|---|---|---|---|
| | | during Preliminary EIA. | indirect stakeholders. | | |
| **Vulnerable groups** | Vulnerable stakeholders must be identified and engagement tailored accordingly. | National legislation does not explicitly require vulnerability screening in Preliminary EIA procedures. | Vulnerability assessment is generally not conducted unless required by lenders. | Conduct vulnerability screening and include targeted engagement measures where relevant. | Included in SEP and ESIA |
| **Stakeholder Engagement Plan (SEP)** | SEP must be prepared, disclosed and updated. | SEP is not required under Albanian Preliminary EIA procedures. | Lack of a formal engagement planning tool and monitoring framework under national requirements. | Maintain and update SEP consistent with ESR10 requirements. | SEP prepared |
| **Information disclosure** | Stakeholders must receive timely, relevant and understandable information. | Disclosure of the Preliminary EIA report and project information through NEA and local authorities; information often technical in nature. | Information is not always presented in accessible formats, and proactive disclosure beyond statutory requirements is limited. | Provide non-technical summaries and accessible communication materials. | Prepared / ongoing updates |
| **Meaningful consultation** | Meaningful consultation and documentation of feedback required. | Public comments may be submitted during the review period; public hearings are not systematically required for Preliminary EIA unless requested by authorities. | Consultation may be limited in scope and duration, and documentation of how feedback influences project decisions is not always required. | Maintain consultation log and document responses and mitigation measures adopted. | In process |

| Topic | EBRD Requirement (ESR10 reference) | Albanian Requirement / Practice (Preliminary EIA) | Gap Identified from an EBRD Perspective | Actions Required for Alignment with ESR10 | Status |
|---|---|---|---|---|---|
| **Grievance mechanism** | A project-level grievance mechanism must be established and accessible. | National procedures rely primarily on administrative complaint mechanisms; project-level GRM is not required. | Absence of a formal project-level grievance mechanism under national procedures. | Maintain operational GRM with clear procedures, timelines and record keeping. | GRM active |
| **Protection against retaliation** | Engagement must be free from coercion, intimidation or retaliation. | Not explicitly addressed in Preliminary EIA procedures. | No formal provisions addressing confidentiality or protection of complainants. | Include confidentiality provisions and safe reporting procedures in SEP and GRM. | Included in SEP and GRM |
| **Gender and inclusiveness** | Engagement must be inclusive and gender responsive. | Not specifically addressed in Preliminary EIA procedures. | Participation of women, elderly persons and vulnerable groups is not systematically monitored or ensured. | Apply inclusive engagement methods and monitor participation where relevant. | Included in SEP |
| **Privacy and personal data protection** | Personal data and stakeholder privacy must be protected. | Not systematically addressed in consultation procedures. | Data protection procedures for consultation records and grievances are not typically formalised. | Apply data protection procedures for stakeholder records and GRM. | Included in SEP and GRM |
| **Lifecycle engagement and reporting** | Ongoing communication and reporting required throughout project implementation. | Engagement generally limited to the permitting stage under Preliminary EIA procedures. | National procedures do not require ongoing communication during | Provide periodic stakeholder updates and maintain communication channels during | SER provided; ongoing |

| Topic | EBRD Requirement (ESR10 reference) | Albanian Requirement / Practice (Preliminary EIA) | Gap Identified from an EBRD Perspective | Actions Required for Alignment with ESR10 | Status |
|---|---|---|---|---|---|
| | | | construction or operation. | construction and operation. | |
| **Resources and responsibilities** | Roles, responsibilities and resources must be clearly defined. | Responsibilities for engagement are not formally defined in Preliminary EIA procedures. | Engagement responsibilities may not be clearly assigned at project level. | Maintain defined roles within the E&S management structure and assign a Community Liaison Officer. | E&S team assigned; CLO appointed |
| **Monitoring effectiveness of engagement** | Engagement activities should be monitored and evaluated. | Not required under national Preliminary EIA procedures. | Monitoring indicators and evaluation of engagement effectiveness are generally absent. | Define monitoring indicators and include in E&S reporting. | To be implemented |
| **Contractor engagement** | Contractors must adhere to stakeholder engagement and grievance procedures. | Not addressed in Preliminary EIA procedures. | Contractors interacting with local communities may not follow consistent engagement protocols. | Include stakeholder engagement and GRM requirements in contractor management procedures and CESMP. | To be implemented |

## 2.4. Minimum Actions to Achieve Compliance (PV and BESS Projects)

To achieve alignment with Environmental and Social Requirement 10 Stakeholder engagement, and to complement the limited stakeholder engagement requirements under the Preliminary EIA procedure in Albania, the Projects commit to:

- Ensuring inclusive and gender-responsive stakeholder engagement.
- Maintaining transparent and accessible communication channels.
- Monitoring engagement performance through measurable KPIs.
- Ensuring all stakeholders have access to a functional grievance mechanism.

# 3. Project Description and Area of Influence (AoI)

## 3.1. General Project Overview

The Project involves the development of two solar photovoltaic (PV) power plants, Blue 2 and Blue 3, together with associated Battery Energy Storage System (BESS) facilities, located in the Municipality of Fier, within the Seman–Sheq Marinas–Topojë area in southwestern Albania.

All components are situated within the same broader geographic area and are technically interconnected through shared electrical infrastructure, including substations, transmission lines, and grid connection facilities, allowing the development to operate as a coordinated renewable energy system. The sites are planned primarily on degraded or low-productivity land affected by salinity and drainage constraints, with limited agricultural value.

The Project contributes to Albania's ongoing efforts to diversify electricity generation, increase renewable energy capacity, enhance grid stability, and reduce reliance on hydropower and electricity imports.

## 3.2. Location and Setting

The Project is located within the Administrative Unit of Topojë, Municipality of Fier, a predominantly rural area characterised by dispersed settlements and agricultural land use. According to the 2011 Population and Housing Census, the population of Topojë AU was approximately 4,246 residents. Data from the 2023 Census indicate a decline to approximately 3,059 residents, representing a population decrease of about 28 %, consistent with broader trends of migration and demographic ageing observed in rural areas of Albania.

The population of Topojë Administrative Unit totals 3,059 inhabitants, according to Census 2023 (INSTAT), with a relatively balanced gender distribution, comprising 1,564 males (51.1%) and 1,495 females (48.9%).

In terms of age structure, the majority of the population falls within the working-age group (15–64 years), accounting for 1,781 individuals (58.2%) overall, including 916 males (58.6% of males) and 865 females (57.9% of females). This indicates a stable labour force base, with a slight predominance of males.

The younger population (0–14 years) represents a smaller share, with 305 individuals in total (10.0%), of whom 175 are male (11.2% of males) and 130 female (8.7% of females). This suggests a moderate level of demographic renewal.

The elderly population (65+ years) totals 973 individuals (31.8%), including 473 males (30.2% of males) and 500 females (33.4% of females). The higher proportion of females in this age group reflects typical demographic trends related to life expectancy.

Overall, the demographic profile of Topojë indicates a working-age dominated population, a relatively balanced gender composition, and a notable share of elderly residents, which may have implications for future public service provision, particularly in healthcare and social support, as evidenced by Census 2023 (INSTAT) data.

The wider area has traditionally been used for agriculture; however, field observations and consultations indicate that the specific parcels selected for the photovoltaic plant were not actively cultivated or used prior to the Project. The land is characterised by degraded soil conditions, limited availability of irrigation, and increased salinity, partly associated with historical agricultural practices, including intensive use of agrochemicals prior to the 1990s, as well as erosion influenced by coastal processes. These factors have significantly reduced soil productivity and contributed to the gradual abandonment of cultivation and use within parts of the Project footprint.

The Project site does not interfere with existing agricultural infrastructure, irrigation networks, or access routes used by surrounding landowners, and agricultural activities in adjacent areas are expected to continue. Planned site preparation and drainage measures are expected to improve local drainage conditions and may contribute to reduced seasonal waterlogging in nearby agricultural lands.

The declining population limited agricultural use of the affected land, and absence of residential settlements within the Project footprint reduce the likelihood of significant adverse socio-economic impacts, while stakeholder engagement undertaken to date indicates a generally neutral to positive perception of renewable energy development in the area.

The nearest settlements and their distances from the project area location include:

- Grykë (approximately 2 km),
- Sheq Marinas (approximately 2.8 km),
- Topojë (approximately 3.6 km).
- Gjokalli (approximately 3.2 km)
- Seman (approximately 3.5 km)

Figure 1 provides an overview of the Project location in relation to the surrounding area.

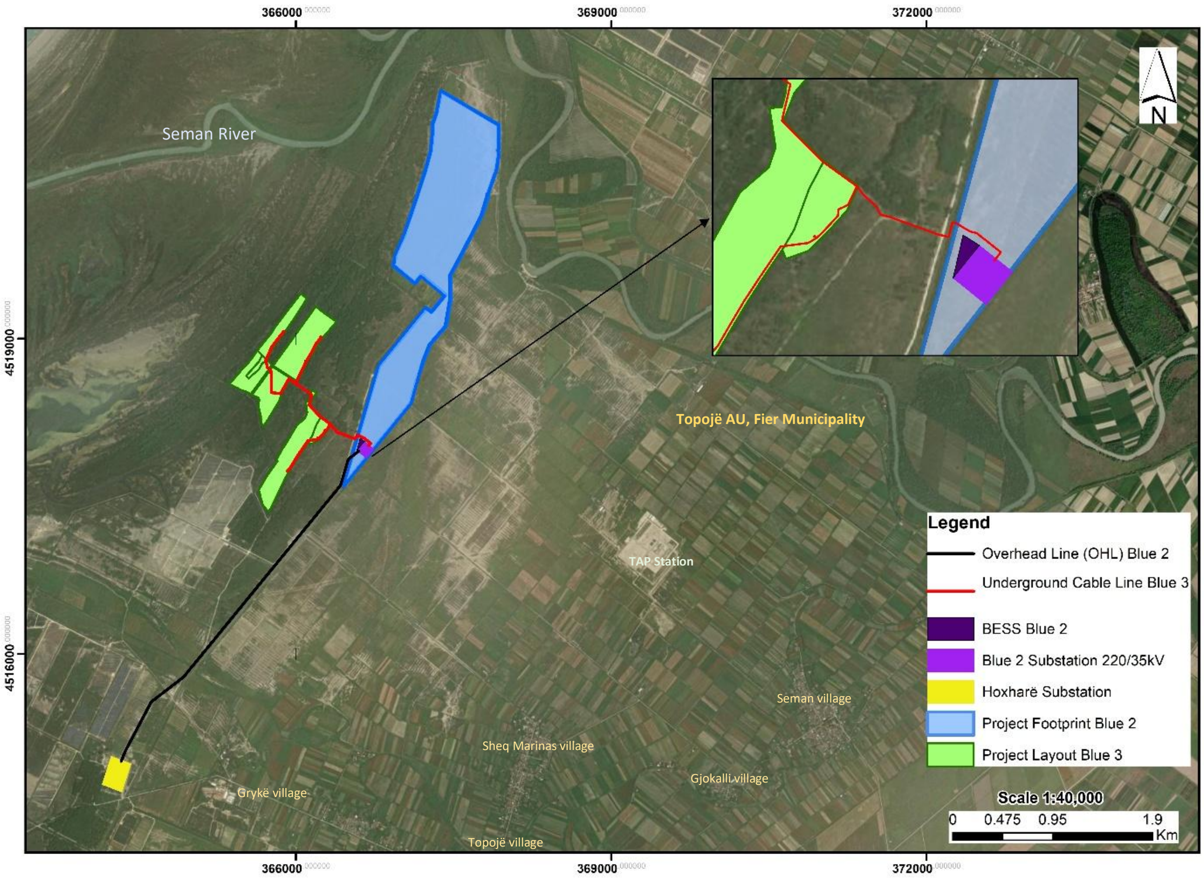


**Figure 1 Map of the Blue 2 and Blue 3, and Battery Energy Storage System (BESS) facilities**

The surrounding landscape is predominantly flat lowland with elevations ranging between 0 and 100 meters above sea level. The broader region includes agricultural plains, drainage channels, river delta systems, coastal dunes, and lagoon environments. The specific site selected for the Project consists mainly of degraded land with high salinity levels and limited agricultural productivity.

### 3.2.1. Blue 2 Photovoltaic Project

#### 3.2.1.1. Project Description

The project is implemented in two phases that operate as a single integrated facility connected to common grid infrastructure.

- Phase 1, with an installed capacity of approximately 64.15 MWp DC, has been operational since August 2025.
- Phase 2, with an additional capacity of approximately 53 MWp DC, is currently under construction, with commissioning planned for mid-2026.
- The combined installed capacity of both phases is approximately 117 MWp DC, placing the project within the category of large grid-connected solar parks.

The plant uses bifacial dual-glass photovoltaic modules mounted on single-axis trackers to optimise energy generation under local irradiation conditions. Electricity generated by the photovoltaic arrays is converted from direct current to alternating current through inverters and transmitted via medium-voltage transformer stations to a shared plant substation. From there, electricity is exported to the national grid through a dedicated transmission connection located approximately 3.8 km from the site.

Phase 2 occupies approximately 75 hectares of land, secured through a combination of private land purchase and lease arrangements, together with a smaller portion of municipal land obtained through formal leasing procedures (69 ha purchased and leased to SPV + 6 ha rented from the municipality).

Legal tenure has been verified through cadastral records, notarised contracts, and municipal allocation decisions, and the land parcels have been confirmed to be free of unresolved disputes or encumbrances. Transactions with private landowners were undertaken on a voluntary basis following direct negotiations and disclosure of project information, supported by valuation or pricing references and documented agreements.

All landowners and relevant land users were identified through cadastral verification and field surveys, and consultations were undertaken to inform stakeholders of the project scope, land requirements, and construction schedule. Consultation records, attendance lists, and correspondence are maintained as part of the project documentation. Site verification and socio-economic screening confirmed that no physical displacement occurred and that economic impacts were negligible; where minor temporary disturbances were identified, these were addressed through agreed mitigation measures and continued access arrangements where applicable.

A grievance mechanism has been established and disclosed to stakeholders, providing clear procedures and contact points for submitting concerns related to land acquisition, construction activities, or project operations. Records of stakeholder engagement and any grievances are maintained in a structured register. All land acquisition and leasing documentation, including cadastral extracts, contracts, consultation records, and payment confirmations, are compiled in a traceable land acquisition file and referenced within the environmental and social management documentation to facilitate monitoring, audit, and lender review.

#### 3.2.1.2. Construction activities

Construction activities include installation of mounting structures, modules, internal cabling, inverter stations, access roads, and temporary construction facilities such as storage areas, workshops, and worker welfare units. These temporary facilities will be removed or rehabilitated following completion of construction.

The project schedule includes an estimated construction period of approximately 18 to 24 months, followed by operational activities limited primarily to maintenance, periodic inspection, and vegetation management within the plant area.

#### 3.2.1.3. Project Phases

The Project will be implemented in the following phases:

- Mobilisation and site preparation,
- Construction and installation,
- Operation and maintenance,
- Decommissioning and site rehabilitation.

### 3.2.2. Blue 3 Photovoltaic Project

#### 3.2.2.1. Location and Setting

The Blue 3 photovoltaic plant is located within the same general project area as Blue 2, in the Seman coastal zone of the Municipality of Fier, approximately 2–3 km from the Adriatic coastline.

The Project area consists primarily of marshy soils with high salinity and an existing network of drainage channels. The site is located at a considerable distance from protected areas and major urban centres and has been selected to minimise environmental and social impacts in line with international good practice.

#### 3.2.2.2. Project Description

The Blue 3 Project involves the construction and operation of a photovoltaic power plant with an installed capacity of approximately:

- 36 MW (AC)

The Project includes:

- photovoltaic panels mounted on fixed structures,
- inverter units and electrical equipment,
- internal cabling and infrastructure,
- underground transmission line connecting to the Blue 2 substation,
- access roads and auxiliary facilities.

Electricity generated at Blue 3 will be transmitted through medium-voltage underground cables to the Blue 2 substation and subsequently to the national transmission grid.

#### 3.2.2.3. Project Phases

Development of Blue 3 will follow the same lifecycle stages as Blue 2:

- Site preparation,
- Construction,

- Operation,
- Decommissioning.

#### 3.2.2.4. Strategic Rationale

The Project contributes to:

- diversification of Albania's energy mix,
- improved energy security,
- reduction of greenhouse gas emissions,
- increased integration of renewable energy sources into the national grid.

### 3.2.3. Battery Energy Storage System (BESS)

#### 3.2.3.1. Overview

The Project includes the development of Battery Energy Storage System (BESS) facilities located within the Blue 2 site and the same broader project area. These facilities are designed to store electricity generated by the operational photovoltaic plants and to support grid stability, peak management, and more efficient integration of renewable energy into the transmission system. The planned storage capacities are as follows:

- Blue 1 BESS: approximately 10 MW / 26.75 MWh
- Blue 2 BESS: approximately 30 MW / 80.25 MWh

The BESS installations will operate in coordination with the associated PV plants and shared electrical infrastructure, forming part of the integrated renewable energy development in the project area.

#### 3.2.3.2. Main Components

The BESS facilities will include:

- battery containers,
- power conditioning systems,
- transformers and switchgear,
- SCADA and Energy Management Systems,
- internal roads and drainage,
- fire protection and safety systems,
- security and monitoring infrastructure.

#### 3.2.3.3. Function and Benefits

Battery storage will:

- support grid stability,
- reduce curtailment of renewable generation,
- improve reliability of electricity supply,

- enhance operational flexibility of the power system.

### 3.2.4. Current Stages of Phases

**Table 2 SEP Implementation Timeline – Blue Solar and BESS Projects**

| Project | Current Status | Project Stage | Key SEP Activities (ESR 10) | Expected Outputs |
|---|---|---|---|---|
| Blue 1 | In operation | Operation phase | Ongoing communication with local communities and authorities.<br>Operation-phase grievance mechanism maintained.<br>Disclosure of relevant environmental and social performance information, where required. | Grievance log<br>Stakeholder communication records<br>Periodic E&S reporting |
| Blue 2 – Phase 1 (64.15 MWp) | In operation | Operation phase | Continued engagement with nearby communities and land users.<br>Communication on maintenance activities or operational issues if relevant.<br>Grievance mechanism maintained. | SEP implementation records<br>Stakeholder meeting notes |
| Blue 2 – Phase 2 (52.10 MWp) | Under construction | Construction phase | Regular engagement with local residents and municipal authorities.<br>Disclosure of construction schedule, traffic and potential disturbances.<br>Active community and worker grievance mechanisms.<br>Monitoring and documentation of stakeholder concerns. | Consultation records<br>Grievance register<br>Periodic SEP monitoring notes |
| Blue 3 | Construction permit under application | Permitting / Pre-construction | Disclosure of project information and design.<br>Consultation with affected stakeholders and authorities.<br>Documentation of feedback and integration into project documentation.<br>SEP update prior to the start of construction. | Consultation records<br>Updated SEP<br>Stakeholder database |
| All Blue Projects | Continuous | All phases | Periodic review and update of SEP. | Updated SEP<br>Annual or periodic stakeholder |

| Project | Current Status | Project Stage | Key SEP Activities (ESR 10) | Expected Outputs |
|---|---|---|---|---|
| | | | Maintenance of stakeholder database and grievance mechanism.<br>Reporting to lenders and authorities as required. | engagement reports |

### 3.2.5. Workforce and Activities

During the construction phase, the Project will employ a temporary workforce, including skilled and unskilled workers, contractors and subcontractors. During operation, the workforce will be significantly smaller and focused on operation, maintenance and monitoring activities.

Worker accommodation is not expected to be required on a large scale, and most workers are expected to be sourced locally or regionally where feasible.

## 3.3. Project Area of Influence

### 3.3.1. Definition of Area of Influence

The Blue 2, Blue 3 and BESS facilities are being developed within the same general geographic area and are technically integrated through shared electrical infrastructure and coordinated operation.

The projects are located in an area already characterized by energy infrastructure and agricultural land use, and have been sited to avoid:

- settlements,
- protected areas,
- high-value agricultural land where feasible.

All projects are located in the Seman River estuary area, characterized by:

- Flat and low-lying terrain,
- Agricultural land and drainage canals,
- Proximity to coastal pine forests and the Adriatic coastline,
- Existing renewable energy and electrical infrastructure in the wider area.

Engagement activities will be implemented during construction and operation in accordance with EBRD requirements (ESRs), and Albanian legislation. For the purposes of stakeholder engagement, the Project Area of Influence (AoI) has been defined in accordance with EBRD ESR 1: Assessment and Management of Environmental and Social Risks and Impacts and ESR 10: Stakeholder Engagement. The AoI includes areas potentially affected by direct and indirect environmental and social impacts, as well as areas where stakeholders may have an interest in the Project.

The Area of Influence is divided into three zones:

- Primary Area of Influence.
- Secondary Area of Influence.

- Wider Area of Interest.

### 3.3.2. Primary Area of Influence

The Primary Area of Influence includes areas where direct impacts may occur, including:

- The footprints of the Blue 2 and Blue 3 photovoltaic plants.
- The BESS facilities.
- Substations and grid connection infrastructure.
- Internal access roads and construction areas.
- Temporary storage and laydown areas.
- Underground or overhead transmission routes.

Potential impacts in this area may include:

- Construction-related noise and dust.
- Temporary traffic and transport movements.
- Occupational health and safety risks.
- Temporary land disturbance.

### 3.3.3. Secondary Area of Influence

The Secondary Area of Influence includes areas that may experience indirect impacts, including:

- The settlements located within the wider project area include the villages of Grykë, Sheq Marinas, Topojë, Gjokalli, and Seman (as shown in Figure 1).
- Local roads used for transport of materials and equipment.
- Agricultural land and drainage systems in the vicinity.
- Areas where local services may experience increased demand during construction.

Potential indirect impacts may include:

- Increased traffic on local roads.
- Temporary disturbance during construction.
- Local economic effects, including employment opportunities.

### 3.3.4. Wider Area of Interest

The Wider Area of Interest includes stakeholders who may not be directly affected but who may have an interest in the Project, including:

- Municipality of Fier and regional authorities.
- National regulatory and environmental institutions.
- Electricity transmission and distribution operators.

- Non-governmental organisations.
- Academic institutions.
- The general public.

The Secondary Area of Influence and Wider Area of Influence may be impacted by cumulative impact of the other projects developed or under development in the area:

- The TAP Project;
- Photovoltaic Plant of Topojë constructed by “AED Solar” sh.p.k. with an installed capacity of 2 MW;
- A new project, “Natyral Energy System”, sh.p.k. approved by MIE for the construction of Eolic plant with a capacity of 3 MW, in Grykë village, Topojë AU, Fier Municipality and;
- The Photovoltaic-Karavasta Park with an installed capacity of 140 MW is in the operational phase and the main activities in the field relates to the maintenance.
- Karavasta 140 MW - Photovoltaic Park and OHL The Photovoltaic-Karavasta Park is located in Remas - Karavasta Divjakë, Lushnje and Libofshë Fier. The project is operational and is located 1.8 km from Blue 3 SPV. It covers an area of 196 ha. The associated 220 kV overhead transmission line (OHL) will run
- The transmission line extends approximately 19.2 km in a southeasterly direction from the Karavasta SPV to the Fier substation, providing the connection of the PV plant to the national grid. It is located 2.9 km from the Blue 3 SPV. The Karavasta SPV is currently in the operational phase, with field activities primarily related to routine maintenance.

The map in Figure 2, presents the location of the projects in relation to the Project area covered by this SEP, indicating that they fall within the same area of influence.

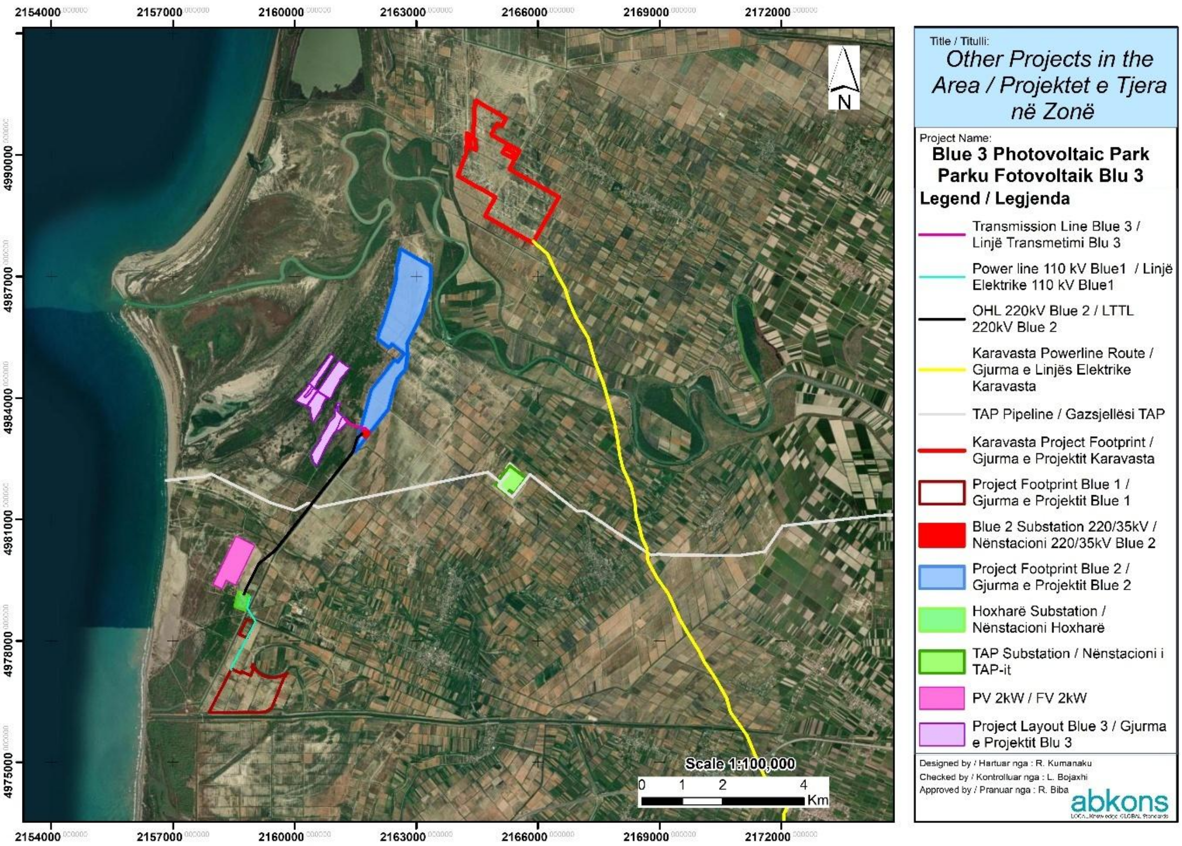


Figure **2 Blue Projects and Other Projects in the area**

### 3.3.5. Sensitive Receptors

Sensitive receptors within or near the Area of Influence include:

- Residential areas in nearby villages.
- Agricultural land and irrigation infrastructure.
- Local road users.
- Surface water channels and drainage systems.

These receptors are considered in planning stakeholder engagement and communication activities.

### 3.3.6. Area of Influence for Stakeholder Engagement

For the purposes of stakeholder engagement, priority will be given to:

- Communities located closest to the project sites.
- Land users and farmers in adjacent areas.
- Local authorities and administrative units.
- Institutions responsible for infrastructure and environmental management.

Engagement activities will be scaled according to the level of potential impact and stakeholder interest.

# 4. Identification and Analysis of Stakeholders

## 4.1. Purpose of Stakeholder Identification

Stakeholder identification is undertaken to ensure that all individuals, groups, and organisations that may be affected by the Project, or that may have an interest in its implementation, are appropriately informed and consulted.

In accordance with EBRD Environmental and Social Requirement 10 (ESR 10), stakeholders are identified and analysed in order to:

- Understand nature and level of potential impacts on different groups.
- Identify stakeholders who may require targeted engagement.
- Ensure that vulnerable or disadvantaged groups are not excluded from the consultation process.
- Determine appropriate methods and frequency of engagement.
- Support effective communication and grievance management.

Stakeholder identification is an ongoing process and will be reviewed periodically as the Project progresses.

## 4.2. Methodology for Stakeholder Identification

Stakeholders have been identified based on:

- Proximity to the Project sites and infrastructure.
- Potential exposure to environmental or social impacts.
- Administrative or regulatory responsibilities.
- Ownership or use of land and infrastructure.
- Economic or social interest in the Project.
- Experience from similar projects in Albania.
- Consultations conducted during project preparation.

The analysis also considers the level of influence and level of interest of each stakeholder group, in order to prioritise engagement activities.

## 4.3. Stakeholder Categories

For the purposes of this SEP, stakeholders are grouped into the following categories:

- Project-affected stakeholders (directly or indirectly):
    - Local communities near the project site (AoI);
    - Landowners, tenants, and informal users of land;
    - Workers, including contractors and supply chain workers;
    - Vulnerable groups, for example low-income households, minorities, elderly;
- Other interested parties:
    - Government authorities at national and local levels;

- Regulatory agencies;
- Non-governmental organizations and civil society;
- Businesses and industry groups.
- Media and academic institutions.

Each category is described below.

### 4.3.1. Project-Affected Stakeholders

#### 4.3.1.1. Local Communities near to the project site

Project-affected communities are defined as individuals and households located within the Area of Influence who may experience direct or indirect impacts during construction or operation.

These communities include residents of settlements located in proximity to the Project area, including villages within the Municipality of Fier including the villages of Grykë, Sheq Marinas, Topojë, Gjokalli, and Seman.

Key interests and concerns of project-affected communities may include:

- construction traffic and road safety.
- temporary noise and dust during construction.
- employment opportunities.
- land access and agricultural activities.
- community health and safety.
- long-term presence of infrastructure in the landscape.

These stakeholders are considered high priority for engagement.

#### 4.3.1.2. Landowners, tenants, and informal users of land

The Project site has been acquired prior to the current phase of development. However, in line with EBRD requirements, individuals and groups affected by past land acquisition are considered project-affected stakeholders.

The Project site was not subject to any significant prior productive use due to low land fertility and limited agricultural viability. As a result, the land was not actively cultivated or used for income-generating activities prior to acquisition.

The land was owned by private individuals who are considered former landowners. These individuals were no longer residing on or using the land. No tenants or informal land users were identified at the time of acquisition.

Based on available information, no physical or economic displacement associated with livelihoods has been identified. Nevertheless, in line with EBRD requirements, former landowners are recognized as project-affected stakeholders from prior land acquisition. The Project will ensure that these stakeholders have access to the grievance mechanism should any residual concerns arise.

#### 4.3.1.3. Businesses, Land Users and Infrastructure Operators near the Project Site and Transport Routes

This category includes:

- Local farmers and land users in the vicinity of the Project site.
- Small businesses in nearby settlements near the Project site and along transport routes.
- Contractors and service providers.
- Operators of existing infrastructure, such as pipelines, drainage canals, transmission lines or roads.

These stakeholders may experience indirect impacts, including temporary disturbance during construction or changes in access conditions. They may also benefit from economic opportunities associated with the Project.

#### 4.3.1.4. Workers and Contractors

Workers engaged in the Project represent a distinct stakeholder group under EBRD ESR 2 (Labour and Working Conditions).

This group includes:

- Direct employees of the Project Sponsor.
- Contractors and subcontractors.
- Temporary construction workers.
- Operation and maintenance personnel.

Key issues relevant to this group include:

- Occupational health and safety.
- Working conditions.
- Accommodation and welfare.
- Access to a worker grievance mechanism.

A separate worker grievance mechanism will be implemented in accordance with ESR 2.

#### 4.3.1.5. Vulnerable or Disadvantaged Groups

In accordance with EBRD ESR 10, particular attention is given to identifying vulnerable or disadvantaged groups who may:

- Be disproportionately affected by Project impacts.
- Have limited access to information.
- Face barriers to participation in consultations.

Potential vulnerable groups in the Project area may include:

- Elderly residents in rural communities.
- Low-income households.
- Small-scale farmers dependent on local infrastructure.

- Persons with disabilities.
- Women in households with limited access to public decision-making processes.

The identification of vulnerable groups in Topojë Administrative Unit is based on Census 2023 (INSTAT) data and reflects EBRD requirements for disaggregation by category and gender. The analysis integrates absolute figures and proportional shares to support evidence-based stakeholder engagement and inclusive planning.

- Elderly population (65+ years): The elderly population in Topojë totals 973 individuals, representing 31.8% of the total population. Of these, 473 are male, accounting for 30.2% of the male population, and 500 are female, representing 33.4% of the female population. This indicates a significant ageing trend, with a slightly higher concentration among women. The gender imbalance reflects longer female life expectancy and suggests the need for targeted healthcare, social protection, and support services, particularly for elderly women who may face increased risks of isolation and economic vulnerability.
- Persons with disabilities or difficulties: A total of 454 individuals, or 16.5% of the assessed population (2,754), are reported as having difficulties. This includes 202 males (14.5% of males) and 252 females (18.5% of females). The data indicate a higher prevalence among women, highlighting gender-specific vulnerability within this group. Persons with disabilities constitute a key target group for inclusive measures, particularly in relation to accessibility, healthcare, employment, and participation in public life, in line with EBRD social inclusion standards.
- Illiterate population: The illiterate population comprises 116 individuals, representing 4.0% of the population aged 6 years and above (2,878 individuals). While gender-disaggregated data are not available, this group remains vulnerable due to limited access to information, public services, and employment opportunities. Illiteracy may also constrain effective participation in stakeholder engagement processes, requiring tailored communication approaches.
- Individuals with no or limited education: A total of 47 individuals (1.6%) have not completed any level of education, while 186 individuals (6.5%) have never attended school, resulting in a combined total of 233 individuals or 8.1% of the population aged 6 years and above. These groups face structural barriers to labour market participation and social inclusion. Although gender breakdown is not specified, such vulnerabilities are often more pronounced among women and older cohorts, requiring targeted educational and capacity-building interventions.
- Widowed individuals: Widowed persons total 278 individuals, representing 9.1% of the total population. Although gender-disaggregated data are not provided, this category is typically dominated by women due to demographic patterns. Widowed individuals may face reduced household income, social isolation, and increased dependency, making them a priority group for social support measures.
- Single (never married) individuals: There are 759 individuals who have never married, accounting for 24.8% of the total population. This group largely includes younger cohorts but may also encompass economically inactive individuals. While not inherently vulnerable, specific sub-groups, particularly youth and women, may face challenges related to employment, economic independence, and social inclusion.
- Divorced or separated individuals: Divorced or separated individuals' number 44, representing 1.4% of the total population. Although relatively small in size, this group may experience social and economic vulnerabilities, particularly in cases of single-parent households or limited income sources and may require targeted support interventions.

The vulnerability profile of Topojë highlights several key structural challenges. The high proportion of elderly persons (31.8%) and individuals with disabilities (16.5%) represents the most significant sources of vulnerability. Women are disproportionately represented among both elderly and persons with difficulties, indicating the need for gender-responsive approaches. Education-related vulnerabilities persist, with 8.1% of the population having no or limited schooling, despite generally high literacy rates.

Engagement methods will be adapted where necessary to ensure these groups have equitable access to information and consultation opportunities.

### 4.3.2. Other interested parties

#### 4.3.2.1. Local Authorities and Public Institutions

Local authorities and public institutions play an important role in planning, infrastructure coordination, public communication and environmental oversight.

Key stakeholders in this category include:

- Municipality of Fier.
- Topoja Administrative Unit.
- regional environmental and inspection authorities.
- emergency and civil protection services.
- local public utilities and infrastructure operators.

These stakeholders typically have high influence and high interest in the Project and require regular communication and coordination.

#### 4.3.2.2. National Authorities and Regulatory Bodies

National-level stakeholders include institutions responsible for:

- Environmental permitting and compliance.
- Energy regulation and licensing.
- Transmission system operation.
- Land administration and planning.
- Occupational health and safety oversight.

These stakeholders have a high level of influence over Project approvals and compliance, and engagement will focus on regulatory coordination and reporting.

#### 4.3.2.3. Civil Society Organisations and Other Interested Parties

Other stakeholders who may have an interest in the Project include:

- Environmental non-governmental organisations.
- Community associations.
- Academic and research institutions.
- Media organisations.

- Members of the public with an interest in renewable energy or environmental protection.

These stakeholders may not be directly affected but may seek information or participate in consultations.

**Table 3 Stakeholder Mapping**

| **Stakeholder Group** | **Key Interests and Concerns** | **Influence** | **Level of Interest** | **Proposed Engagement Methods** |
|---|---|---|---|---|
| Residents and farmers of the villages of Grykë, Sheq Marinas, Topojë, Gjokalli, and Seman. | Construction impacts, traffic, noise, dust, employment opportunities, community health and safety | Low–Moderate | High | Public meetings, information leaflets, grievance mechanism, periodic updates |
| Municipality of Fier | Local development, infrastructure coordination, environmental and social impacts, employment opportunities | High | High | Regular coordination meetings, formal reporting, consultation workshops |
| Topojë Administrative Unit cover the Project area<br><br>Head of the villages of Grykë, Sheq Marinas, Topojë, Gjokalli, and Seman. | Communication with local communities, local infrastructure and services | Moderate | High | Coordination meetings, information sharing |
| Regional environmental and inspection authorities | Compliance with environmental legislation, monitoring and reporting | High | High | Formal reporting, technical meetings, site visits |
| National regulatory authorities (environment, energy, labour, transport)<br><br>Road Police Directorate of the State Police, Fier, for coordination of traffic management and road safety measures | Regulatory compliance, permitting, environmental and social performance.<br><br>Project will consult and, where required, obtain approvals or notifications from the competent institutions responsible for road administration, traffic management. | High | Moderate–High | Formal submissions, meetings, notification, periodic reporting |
| IKTK, Regional and local heritage authorities, and | Local authorities and cultural heritage institutions where applicable, will be | High | Moderate–High | Formal meeting |

| Stakeholder Group | Key Interests and Concerns | Influence | Level of Interest | Proposed Engagement Methods |
|---|---|---|---|---|
| directory of Apolonia archaeological Park | informed of Project activities, and a chance-find procedure will be implemented. | | | |
| Transmission system operator and utilities | Grid connection, operational safety, infrastructure protection | High | High | Technical coordination meetings, formal communication |
| Contractors and subcontractors | Contract implementation, working conditions, health and safety | Moderate | High | Contractor meetings, inductions, worker engagement procedures |
| Project workers | Occupational health and safety, working conditions, accommodation, grievance procedures | Low | High | Worker induction, toolbox talks, worker grievance mechanism |
| Local businesses and service providers | Construction impacts, traffic, noise, dust, employment opportunities, community health and safety. Economic opportunities, procurement, local services | Low | Moderate | Information disclosure, targeted meetings where relevant |
| Environmental NGOs and civil society organisations | Environmental impacts, biodiversity, sustainability practices | Moderate | Moderate | Disclosure of ESIA documents, consultation meetings, responses to enquiries |
| Media and general public | Project information, transparency, public interest | Low | Moderate | Public disclosure, website or communication materials |

In line with EBRD ESR10, vulnerable groups within the Project area were identified during the ESIA and are considered in this Stakeholder Engagement Plan. These include elderly residents, low-income households, small-scale farmers, persons with disabilities, and women in rural households.

Potential concerns may relate primarily to access to information and consultation processes, participation in meetings, and, for farmers, access to land, drainage, and local roads. To address these risks, the Community Liaison Officer (CLO) of Project Blue has conducted meetings with representatives of the Topojë Administrative Unit and the respective Heads of Villages, as well as direct communication with local residents where relevant.

In addition, targeted engagement measures have been implemented, including accessible local meetings, clear and simplified communication materials, inclusive consultation arrangements, direct communication with affected stakeholders, and the establishment of an accessible grievance mechanism to ensure that concerns can be raised and addressed in a timely manner.

These measures are intended to ensure that vulnerable stakeholders can participate effectively in the engagement process and have equitable access to project information and feedback channels throughout the Project lifecycle.

**Table 4 Vulnerable Groups Mapping**

| Vulnerable Group | Potential Concerns | Engagement Approach |
|---|---|---|
| Elderly residents in rural communities | Limited access to meetings or information | Local meetings, simplified communication materials |
| Low-income households | Limited access to employment or information | Community meetings, accessible grievance mechanism |
| Small-scale farmers | Access to land, drainage and roads | Targeted consultations and direct communication |
| Persons with disabilities | Access to consultation venues and information | Accessible communication channels |
| Women in rural households | Participation in consultations | Inclusive consultation arrangements and flexible meeting times |

## 4.4. Stakeholder Analysis and Prioritisation

Stakeholders have been analysed based on two key criteria:

- level of potential impact or interest in the Project;
- level of influence over Project decisions or implementation.

This analysis supports the development of targeted engagement strategies.

| | | |
|---|---|---|
| High Interest | NGOs and local organisations<br>Local businesses operating near the Project area | Municipality of Fier<br>Relevant regulatory authorities<br>Transmission system operators<br>Local communities<br>Farmers and land users |

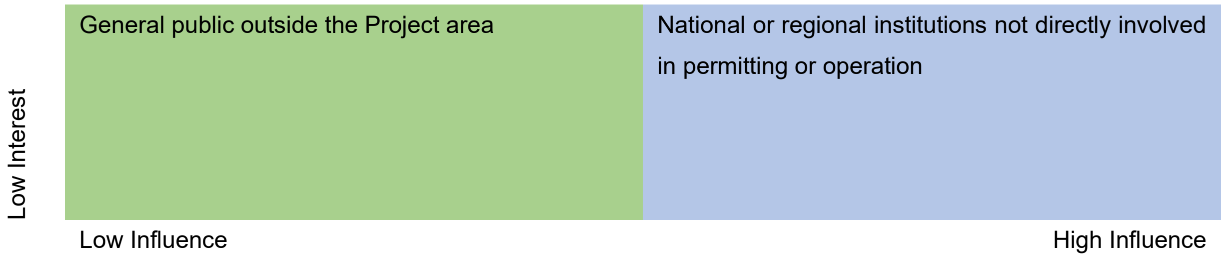


**Figure 3 Stakeholder prioritisation**

### 4.4.1. Stakeholder Prioritisation Summary

Stakeholders have been prioritised based on the level of potential impact and their influence over Project implementation:

**High priority stakeholders**

- Local communities in the immediate vicinity of the Project. The settlements located within the wider project area include the villages of Grykë, Sheq Marinas, Topojë, Gjokalli, and Seman
- Municipality of Fier and Topojë Administrative Unit.
- Environmental and regulatory authorities.
- Transmission system operator.

**Medium priority stakeholders**

- Farmers and land users.
- Local businesses.
- NGOs and civil society organisations.

**Lower priority stakeholders**

- General public outside the immediate area of influence.
- Engagement frequency and methods will be adapted accordingly.

### 4.4.2. Ongoing Stakeholder Identification

Stakeholder identification is a dynamic process. Additional stakeholders may be identified during:

- Detailed design.
- Construction activities.
- Consultations and disclosure activities.
- Operation of the grievance mechanism.

The stakeholder database will be updated as necessary throughout the Project lifecycle.

## 4.5. Updating the Stakeholder Register

The stakeholder list and analysis will be reviewed and updated:

- Prior to the start of construction.
- Periodically during construction.
- At key milestones during operation.
- Whenever new stakeholders are identified.

Records of stakeholder engagement activities will be maintained and used to improve future engagement.

# 5. Stakeholder Engagement Program and Consultation Methods

## 5.1. Objectives of the Stakeholder Engagement Program

The stakeholder engagement program has been developed to ensure systematic, transparent and inclusive communication with stakeholders throughout the Project lifecycle. The program aims to:

- Provide stakeholders with timely, relevant and understandable information about the Project.
- Ensure that stakeholders have opportunities to express views, concerns and suggestions.
- Incorporate stakeholder feedback into project planning and implementation where appropriate.
- Establish accessible channels for communication and grievance submission.
- Maintain constructive relationships with project-affected communities, authorities and other interested parties.

Stakeholder engagement is considered a continuous process that will evolve in accordance with the Project phases and stakeholder needs.

## 5.2. Principles of Stakeholder Engagement

Engagement activities will be carried out in accordance with the principles set out in EBRD ESR 10 and international good practice, including:

- Transparency and accountability.
- Early and ongoing engagement.
- Accessibility of information.
- Inclusiveness and non-discrimination.
- Cultural appropriateness of communication methods.
- Responsiveness to stakeholder concerns.
- Documentation and monitoring of engagement activities.

Special consideration will be given to ensuring that vulnerable or disadvantaged groups have access to information and opportunities to participate.

### 5.3. Confidentiality, Protection Against Retaliation, and Personal Data Protection

The Project will ensure that stakeholder engagement activities and the operation of the Grievance Redress Mechanism (GRM) are conducted in a manner that respects confidentiality, protects personal data, and prevents any form of coercion, intimidation, discrimination, or retaliation, in line with the requirements of the EBRD Environmental and Social Policy, in particular ESR 10.

Stakeholders will be able to submit comments, participate in consultations, and raise grievances without fear of adverse consequences. The Project will not tolerate retaliation against individuals or groups who engage with the Project or submit grievances in good faith. Where requested, grievances may be submitted confidentially or anonymously, and the identity of complainants will be protected and disclosed only to personnel directly responsible for handling the matter, and only where necessary for resolution.

Personal data collected during stakeholder engagement or grievance handling will be limited to information necessary to respond to concerns and will be processed in accordance with applicable national legislation on personal data protection and international good practice. Such information will be stored securely, access will be restricted to authorised personnel, and personal data will not be disclosed publicly or to third parties without consent, unless required by law or necessary for grievance resolution.

Records of consultations and grievances will be reported in aggregated or anonymised form where appropriate. Participants will be informed of the purpose of data collection and their rights regarding confidentiality and the handling of personal information.

### 5.4. Stakeholder Engagement Approach by Project Phase

Engagement methods and frequency will vary depending on the phase of the Project.

#### 5.4.1. Pre-Construction Phase

During the planning and permitting stages, engagement activities will focus on:

- disclosure of project information and environmental and social documentation.
- consultations with local communities and authorities.
- identification of stakeholder concerns and expectations.
- establishment of grievance mechanisms and communication channels.

Typical engagement activities will include:

- public consultation meetings.
- meetings with local authorities and institutions.
- disclosure of the Non-Technical Summary and SEP.
- bilateral meetings with key stakeholders.

#### 5.4.2. Construction Phase

During construction, engagement activities will focus on:

- Providing updates on construction activities and schedules.

- Communicating potential temporary impacts such as traffic or noise.
- Maintaining regular communication with local authorities.
- Managing grievances and responding to stakeholder concerns.
- Monitoring community health and safety issues.

Engagement activities may include:

- Periodic community meetings or briefings.
- Information notices and announcements.
- Meetings with local authorities and infrastructure operators.
- Regular operation of the grievance mechanism.

### 5.4.3. Operation Phase

During operation, engagement activities will focus on:

- Maintaining communication channels with stakeholders.
- Providing periodic updates on project performance where relevant.
- Addressing grievances and inquiries.
- Reporting environmental and social performance to authorities and lenders as required.

Engagement activities may include:

- Periodic information updates.
- Meetings with local authorities.
- Maintenance of the grievance mechanism.
- Disclosure of monitoring results where appropriate.

## 5.5. Consultation Methods

A range of consultation and communication methods will be used to ensure effective engagement with different stakeholder groups.

### 5.5.1. Focused Meetings and Small Group Discussions

Targeted meetings may be held with:

- Farmers and land users.
- Vulnerable groups.
- Local businesses.
- Community representatives.

These meetings allow more detailed discussion of specific concerns.

### 5.5.2. Bilateral Meetings

Bilateral meetings will be conducted with:

- Local and national authorities.
- Infrastructure operators.
- Regulatory bodies.
- Contractors and utilities.

These meetings are used to coordinate technical and administrative issues.

## 5.6. Information Disclosure Materials

All information about Blue project are publicized in the project website:

https://www.spvblue.com/

Information materials include:

- Leaflets and notices.
- ESIA/ Non-Technical Summaries reports.
- Announcements through local authorities.
- Electronic distribution where feasible.

Information will be provided in a clear and accessible format.

The Project will implement the following disclosure channels:

- Site Notice Boards: Monthly updates on engagement activities. Summary of grievances and resolutions.
- Municipal Disclosure. Information shared with local authorities and community offices
- Online Disclosure (if applicable): Project updates, Non-Technical Summary (NTS), Contact details
- Community Meetings: Periodic public briefings

### 5.6.1. Electronic and Remote Communication

Where appropriate, communication may include:

- Email correspondence.
- Telephone communication.
- Electronic distribution of documents.

These methods support continuous communication and accessibility.

### 5.6.2. Site Visits

Where relevant, organised site visits may be arranged for:

- Authorities.

- Community representatives.
- Lenders or independent experts.

Site visits help improve transparency and understanding of project activities.

## 5.7. Engagement with Vulnerable Groups

Specific measures may be implemented to ensure effective engagement with vulnerable groups, including:

- Providing information in clear and understandable language.
- Organizing small-group meetings where appropriate.
- Ensuring consultation venues are accessible.
- Coordinating with local authorities or community representatives to identify and reach vulnerable stakeholders.

## 5.8. Documentation of Engagement Activities

All engagement activities must be formally recorded using a standard template. All engagement records must capture: Gender, Stakeholder category, Location. Minimum Documentation Requirements:

- Date and location.
- Type of engagement (meeting, consultation, disclosure).
- Stakeholder group.
- Number of participants (with gender breakdown).
- Key issues raised.
- Responses provided.
- Agreed actions.

All records will be entered into the stakeholder database and used for KPI monitoring.

## 5.9. Resources and Responsibilities

Responsibility for implementation of the stakeholder engagement program will be assigned to designated personnel, typically including:

- Environmental and Social Manager.
- Community Liaison Officer.
- Contractor representatives during construction.

Adequate resources will be allocated to ensure effective implementation of engagement activities.

## 5.10. Review and Update of the Engagement Program

The stakeholder engagement program will be reviewed periodically to ensure that it remains appropriate and effective. Updates may be made in response to:

- Changes in project design or schedule.
- New stakeholders being identified.

- Feedback received through consultations or grievances.
- Monitoring results and lessons learned.

**Tabela 1 Disclosure Schedule**

| Information to be disclosed | Method | Location | Frequency | Responsibility |
|---|---|---|---|---|
| **Project information summary** | Website, noticeboards, leaflets | Project website, local municipality offices, community noticeboards | Prior to construction, updated as needed | CLO |
| **Stakeholder Engagement Plan (SEP)** | Website, hard copy | Website, municipality offices | Once, with updates as required | E&S Manager |
| **Grievance mechanism details** | Posters, leaflets, website | Project site, local communities, online | Continuous | CLO |
| **Construction updates** | Noticeboards, website updates | Project site and nearby communities | Monthly | CLO / Contractor |
| **Annual E&S summary** | Website | Online | Annually | E&S Manager |

# 6. Grievance Mechanisms

## 6.1. Community Grievance Mechanism

The Project has established a Community Grievance Mechanism (GM) to provide a formal and transparent process through which affected communities, stakeholders, and other interested parties may raise concerns, complaints, or suggestions related to project activities. The GM has been developed in accordance with the requirements of the EBRD Environmental and Social Policy, in particular ESR 10 on Stakeholder Engagement, which requires the establishment of a culturally appropriate, accessible, and transparent mechanism for receiving and addressing grievances.

The mechanism is designed to complement, and not replace, existing national administrative or judicial remedies available under Albanian legislation. Stakeholders retain the right to pursue resolution through local authorities, regulatory institutions, or the courts at any stage.

The GRM is based on the principles of accessibility, transparency, confidentiality, and timely response. Multiple submission channels are provided to ensure that grievances can be raised without barriers, including options for anonymous or confidential submissions where appropriate. The Project will ensure that grievances can be submitted and addressed without fear of coercion, intimidation, or retaliation.

All grievances will be recorded, assessed, and addressed in a structured manner, and outcomes will be communicated to complainants within defined timeframes. Summary information on grievances and their resolution will be included in periodic monitoring and reporting, while respecting confidentiality requirements.

The process followed for the receipt, handling, and closure of grievances is presented in the following figure.

A Grievance Mechanism (GM) has been established and is currently operational for all Blue Projects. The mechanism is publicly disclosed on the Project website and can be accessed at:

https://www.spvblue.com/grievance-mechanism/n

This mechanism will also apply to the BESS Project. It provides stakeholders, including affected communities and other interested parties, with a transparent, accessible, and structured process for raising concerns, complaints, or suggestions related to project activities.

The grievance mechanism aims to:

- Enable stakeholders to raise concerns in a timely and accessible manner.
- Ensure that grievances are acknowledged, assessed and addressed promptly.
- Improve project performance by identifying and resolving issues early.
- Strengthen trust and communication between the Project and stakeholders.
- Prevent escalation of conflicts where possible.

The grievance mechanism will be available throughout all phases of the Project, including construction and operation.

### 6.1.1. Scope of the Grievance Mechanism

The grievance mechanism is available to:

- Local communities.
- Land users and farmers.
- Local businesses.
- Community organisations.
- Other interested stakeholders.

Grievances may relate to, but are not limited to:

- Construction activities.
- Traffic and access issues.
- Noise, dust or other disturbances.
- environmental impacts.
- community health and safety.
- behaviour of workers or contractors.
- employment-related concerns raised by community members.

Worker-related grievances are addressed through a separate worker grievance mechanism established in accordance with EBRD ESR 2.

### 6.1.2. Principles of the Grievance Mechanism

The grievance mechanism is designed in accordance with the following principles:

- Accessibility to all stakeholders without cost.

- Transparency and fairness.
- Confidentiality where requested.
- Non-retaliation against complainants.
- Timely response and resolution.
- Clear documentation and record keeping.

Stakeholders may submit also grievances anonymously if they prefer.

### 6.1.3. Submission of Grievances

Grievances may be submitted either verbally or in writing. Where a grievance is submitted verbally, it may be communicated directly to a project specialist or company representative. The receiving representative will document the grievance by completing the standard grievance form, ensuring that all relevant information is captured, and will forward it to the designated Grievance Manager for registration, review, and follow-up.

Written grievances may be submitted by completing the grievance form or by providing the relevant information through other written means. To ensure accessibility, grievances may be submitted through multiple channels, including:

- email;
- telephone;
- written grievance forms submitted in person or by post;
- submission through local authorities or community representatives;
- verbal complaints recorded by project personnel;
- grievance boxes, where appropriate.

Information on the GM, including contact details, submission channels, and response timelines, has been publicly disclosed and included in stakeholder consultation materials to ensure that affected parties are aware of the mechanism and how to access it.

The grievance form is available on the project webpage and can be downloaded, completed, and submitted in accordance with the instructions provided at the following link:

https://www.spvblue.com/wp-content/uploads/2023/03/Grievance-Form_FINALE-1.pdf

Completed forms and other grievance submissions may be sent to:

Email: projectblue@blessedinvestment.com

Tel: +355 6883 48987

Tel: +355 4 22 58 326

### 6.1.4. Grievance Handling Procedure

The grievance mechanism follows a structured process to ensure consistency and accountability, and timely resolution of stakeholder concerns. Defined response timelines are applied at each stage of the process.

In addition to formal grievances, the Project receives general inquiries and communications from stakeholders. These are managed separately from the grievance mechanism but follow a defined response protocol. All external (non-grievance) communications are acknowledged within 2–3 working days, and a substantive response is provided within 5–10 working days. All such communications are recorded in a communication log for monitoring and tracking purposes.

Performance related to grievance handling and external communication, including response times and resolution rates, will be monitored through the Project's Key Performance Indicators (KPIs), as presented in Table 5.

#### 6.1.4.1. Step 1: Receipt and Registration

All grievances are recorded in a grievance register within 1–2 working days of receipt, including:

- date of submission;
- contact details (if provided);
- description of the grievance;
- location and stakeholder group;
- assigned responsible person.

Grievances have been acknowledged within a defined timeframe.

#### 6.1.4.2. Step 2: Acknowledgement

The complainant receives a receipt within approximately 3 – 5 working days, confirming that the grievance has been received and is under review.

#### 6.1.4.3. Step 3: Assessment and Investigation

The Project team initiates assessment within 5 working days of receipt. The process includes:

- Review the grievance.
- Determine its nature and severity.
- Assign responsibility for investigation.
- Consult relevant contractors or specialists if necessary.

Where appropriate, site visits or meetings with the complainant have been conducted.

#### 6.1.4.4. Step 4: Response and Resolution

The response provided to the complainant within a reasonable timeframe, within 15–30 working days from the date of receipt, depending on the complexity of the issue.

The response includes:

- findings of the investigation;
- proposed corrective actions where applicable;
- timeframe for implementation.

#### 6.1.4.5. Step 5: Close-out

A grievance is considered closed when:

- the complainant accepts the proposed resolution; or

- all reasonable efforts to resolve the issue have been documented.

Closure is confirmed within 5 working days following agreement or final action. Records of grievances and resolutions are maintained in the grievance log. Records of grievances and resolutions have been maintained.

#### 6.1.4.6. Step 6: Escalation

If a complainant is not satisfied with the proposed resolution, the grievance may be escalated within 5–10 working days of the response. Escalation options include: the grievance may be:

- reviewed by senior project management;
- referred to relevant authorities where appropriate;
- pursued through judicial or administrative channels outside the Project.

Use of the Project grievance mechanism does not prevent access to other legal remedies.

### 6.1.5. Grievance Log and Monitoring

A centralized grievance register is maintained to record and track all community grievances in a systematic, transparent, and accessible manner. The register includes the following minimum information:

- Unique reference number
- Date received
- Location of complainant (village/community)
- Stakeholder category (e.g., local resident, land user, business, vulnerable group)
- Gender of complainant (where disclosed)
- Category/type of grievance
- Description of the issue
- Actions taken
- Date of resolution
- Status (open, under review, closed)

Grievance data are periodically reviewed to identify recurring issues, assess trends, and strengthen stakeholder engagement practices.

The Project conducts monthly monitoring and analysis of grievance data, including:

- Total number of grievances received
- Grievance resolution rate (%)
- Average time for resolution
- Distribution of grievances by stakeholder category
- Distribution of grievances by gender
- Types of grievances raised by different stakeholder groups

This analysis is used to:

- Identify recurring or systemic community concerns
- Assess whether certain groups, including women or vulnerable stakeholders, face barriers in accessing the grievance mechanism
- Improve communication, engagement strategies, and project mitigation measures

Where gaps or trends are identified, corrective actions are implemented, including targeted outreach, improved disclosure of information, and adjustments to the grievance mechanism to ensure equitable access for all stakeholders.

#### 6.1.6. Communication and Visibility of the Grievance Mechanism

Information about the grievance mechanism is disclosed through:

- public consultation meetings;
- information leaflets;
- local authority offices;
- project communication materials.

Stakeholders have been/will be informed about:

- how to submit grievances;
- expected response times;
- confidentiality provisions.

### 6.2. Workers' Grievance Mechanism (ESR2)

The Project has established a Workers' Grievance Mechanism (WGM) in accordance with EBRD Environmental and Social Requirement 2 Labour and working conditions.

This mechanism is detailed in the Labor Management Procedures (LMP) and HR procedures and applies to all categories of workers, including direct employees, contractors, subcontractors, and supply chain workers.

All grievances will be recorded in a dedicated workers' grievance log. An acknowledgement will be provided within 2–3 working days, and a response will be issued within 5–10 working days. More complex cases may require additional time, in which case the worker will be informed of the expected timeframe.

The Contractor will be primarily responsible for implementation of the WGM for contracted workers, while the Project will oversee compliance and monitor performance through regular reporting. Key performance indicators, such as the number of grievances received and resolution time, will be tracked and included in internal and external reporting.

The WGM is also referenced in this Stakeholder Engagement Plan (SEP) to ensure alignment between internal and external grievance processes.

The mechanism is operational and accessible through multiple channels, including grievance boxes, direct reporting to the Community Liaison Officer (CLO), and phone and email communication.

#### 6.2.1. Scope and Applicability

The Project has established a Workers' Grievance Mechanism (WGM) in accordance with EBRD Environmental and Social Requirement 2 Labour and working conditions. The mechanism is accessible to all categories of workers engaged in Project-related activities.

The WGM applies to:

- Direct workers employed by the Project
- Contractor workers
- Subcontractor workers (all tiers)
- Supply chain workers associated with primary suppliers
- No worker category is excluded from access to the grievance mechanism.

#### 6.2.2. Purpose

The Workers' Grievance Mechanism provides a formal, transparent, and confidential process for workers to raise concerns, complaints, or grievances related to:

- Working conditions
- Occupational health and safety
- Employment terms and conditions
- Harassment, discrimination, or unfair treatment
- Any other workplace-related issue

#### 6.2.3. Key Principles

The mechanism is designed in accordance with the following principles:

- Accessibility: Available to all workers regardless of employment type
- Confidentiality: All grievances are handled with appropriate confidentiality
- Non-retaliation: Workers may raise grievances without fear of retaliation
- Transparency: Clear procedures and timelines are communicated
- Timeliness: Grievances are addressed within defined timeframes

#### 6.2.4. Access Channels

Workers may submit grievances through multiple channels, including:

- Grievance boxes located at accessible site locations
- Direct reporting to supervisors or the Community Liaison Officer (CLO)
- Dedicated phone number and email address
- Written grievance forms available on-site
- Anonymous submissions are permitted.

#### 6.2.5. Communication and Awareness

The Project ensures that all workers are informed about the WGM through:

- Worker induction programs
- Toolbox talks and regular briefings
- Multilingual informational posters displayed on-site
- Contractor and subcontractor onboarding processes
- Contractors are required to ensure that their workers are fully informed and able to access the mechanism.

#### 6.2.6. Monitoring and Oversight

All grievances are recorded in a centralized register and monitored regularly. The Project ensures that grievance data is disaggregated by gender and worker category to support inclusive monitoring and identify any disparities in access or outcomes.

The Project tracks:

- Number of grievances received.
- Grievance resolution rate (%).
- Average time for resolution.
- Distribution by worker category (direct, contractor, subcontractor, supply chain).
- Distribution by gender (male, female, where disclosed).
- Type of grievances by gender (to identify potential gender-related risks or concerns).

Performance is reviewed on a monthly basis, and trends are analysed to:

- Identify recurring issues.
- Assess whether certain groups (including women or vulnerable workers) face barriers in accessing the mechanism.
- Improve responsiveness and inclusiveness of the grievance process.
- Where gaps are identified, corrective actions will be implemented, including targeted awareness measures and adjustments to the grievance mechanism to ensure equal access for all workers.

# 7. Monitoring and Reporting Arrangements

## 7.1. Objectives of Monitoring and Reporting

Monitoring and reporting of stakeholder engagement activities are essential to ensure that the commitments set out in this Stakeholder Engagement Plan are implemented effectively and that engagement activities remain appropriate throughout the Project lifecycle.

The objectives of monitoring and reporting are to:

- track the implementation of stakeholder engagement activities;

- evaluate the effectiveness of communication and consultation methods;
- ensure timely response to stakeholder concerns and grievances;
- identify areas for improvement in engagement practices;
- demonstrate compliance with EBRD ESR 10 and applicable national requirements.

Monitoring will be carried out throughout all phases of the Project, including construction and operation.

## 7.2. Monitoring of Stakeholder Engagement Activities

Monitoring activities will include:

- maintaining records of meetings, consultations and disclosure activities;
- tracking attendance and participation in consultations;
- recording issues raised by stakeholders and actions taken;
- monitoring the operation of the grievance mechanism;
- assessing whether vulnerable groups are effectively reached by engagement activities.

Monitoring results will be reviewed periodically to identify trends, recurring concerns or areas requiring corrective action.

## 7.3. Confidentiality, Privacy and Personal Data Protection

The Project will ensure that all stakeholder engagement activities are conducted in a manner that respects the privacy and confidentiality of participants, in line with the requirements of Environmental and Social Requirement 10 (Stakeholder Engagement and Information Disclosure) and applicable national legislation on personal data protection, as well as the principles of the General Data Protection Regulation (GDPR), where relevant.

Personal data collected during consultations, surveys, meetings, or through the Grievance Redress Mechanism (GRM), such as names, contact details, signatures, photographs, or recorded statements, will be collected only where necessary and solely for the purposes of stakeholder engagement, documentation, and response to grievances. Stakeholders will be informed, where applicable, about the purpose of data collection and the manner in which the information will be used and stored.

All consultation records, attendance sheets, and grievance forms containing personal data will be stored securely, either in password-protected electronic systems or in locked physical archives, and access will be restricted to authorized project personnel responsible for stakeholder engagement and grievance management. Personal data will not be disclosed to third parties without prior consent, unless required by law.

When reporting the outcomes of stakeholder engagement activities, the Project will present information in aggregated or anonymized form, ensuring that individual stakeholders cannot be identified unless explicit consent has been obtained.

The GRM will allow stakeholders to submit grievances confidentially and, where feasible, anonymously. Procedures will be established to ensure that complaints are handled sensitively and that the identity of complainants is protected, particularly in cases involving vulnerable individuals or sensitive issues.

Personal data will be retained only for the period necessary to fulfill the purposes of stakeholder engagement and grievance management, after which it will be securely archived or disposed of in accordance with applicable data protection requirements.

## 7.4. Key Performance Indicators

The Key Performance Indicators (KPIs) presented below are designed to monitor the effectiveness of stakeholder engagement activities and ensure alignment with ESR 10 Stakeholder Engagement of EBRD. The KPIs include both quantitative and qualitative indicators, covering participation, inclusiveness, grievance management, and information disclosure.

Certain indicators, particularly those related to gender participation, female employment, and awareness of the grievance mechanism, are defined as progressive targets. These may be achieved incrementally over time through targeted engagement measures, capacity building, and improved communication strategies.

Data will be collected through stakeholder engagement records, attendance lists, grievance logs, contractor reports, and periodic surveys. The Community Liaison Officer (CLO) will be primarily responsible for data collection and reporting, with oversight from the Environmental and Social Manager.

KPI performance will be reviewed on a regular basis, as defined in the table above, and adjustments to engagement strategies will be made where necessary to address gaps or improve outcomes. An annual review of KPI performance will be undertaken to assess trends, refine targets where appropriate, and ensure continuous improvement in stakeholder engagement practices.

KPI results will be incorporated into the Project's internal Environmental and Social (E&S) monitoring system and reported periodically to senior management and relevant project stakeholders. In line with EBRD requirements, key stakeholder engagement outcomes, including grievance management performance, will be included in regular environmental and social monitoring reports submitted to the lender.

Where appropriate, summary information on stakeholder engagement activities and grievance mechanisms will be disclosed to external stakeholders through publicly available channels, ensuring transparency and accountability. Reporting will be proportionate to the scale and impacts of the Project and will support ongoing compliance with EBRD ESR.

**Table 5 Key Performance Indicators (KPIs)**

| Indicator | Definition | Target | Disaggregation | Frequency | Responsibility | Notes |
|---|---|---|---|---|---|---|
| **Gender participation rate in consultations** | Percentage of female participants in stakeholder engagement activities | ≥ 30% (progressive target) | Gender, age, vulnerable groups | Quarterly | CLO / E&S Manager | May start lower, requires targeted outreach measures |
| **Number of engagement activities** | Total number of consultations, meetings, and outreach events conducted | No target (monitoring) | By type of stakeholder | Monthly / Quarterly | CLO | Used for tracking activity level |
| **Stakeholder participation** | Total number of participants in | No target (monitoring) | Gender, stakeholder group | Quarterly | CLO | Context-dependent |

| Indicator | Definition | Target | Disaggregation | Frequency | Responsibility | Notes |
|---|---|---|---|---|---|---|
| | engagement activities | | | | | |
| **Grievances received** | Total number of grievances submitted | No target (monitoring) | Gender (if available), type of issue | Monthly | CLO | Indicator of accessibility, not performance |
| **Grievance resolution rate** | Percentage of grievances resolved within defined timeframe | ≥ 90% | Gender (if available), type | Monthly / Quarterly | CLO / E&S Manager | Standard EBRD expectation |
| **Average grievance resolution time** | Average number of days to resolve grievances | ≤ 15 days (standard), ≤ 30 days (complex cases) | N/A | Monthly | CLO | Define escalation for complex cases |
| **% of local hires** | Proportion of workforce recruited locally | ≥ 50% (unskilled), ≥ 30% (overall workforce) | Gender, job type (skilled/unskilled) | Quarterly | Contractor / HR | Adjust depending on labor availability |
| **Female employment rate** | Percentage of women employed in project workforce | ≥ 10% (minimum), target up to 20% where feasible | Job category | Quarterly | Contractor / HR | Include admin and support roles |
| **Vulnerable group engagement** | Number of engagement activities targeting vulnerable groups | ≥ 1 per quarter (where groups are identified) | Type of vulnerability, gender | Quarterly | CLO | Define vulnerable groups clearly |
| **Information disclosure activities** | Number of materials disclosed (leaflets, notices, reports) | No target (monitoring) | Type and location | Quarterly | CLO | Ensure accessibility of materials |

| Indicator | Definition | Target | Disaggregation | Frequency | Responsibility | Notes |
|---|---|---|---|---|---|---|
| **Awareness of grievance mechanism** | Percentage of surveyed stakeholders aware of grievance mechanism | ≥ 70% (progressive) | Gender, location | Annually | CLO | May start at ~50–60% and increase over time |

## 7.5. Grievance Monitoring

The grievance mechanism will be monitored through:

- regular review of the grievance register;
- tracking resolution times;
- identification of recurring issues;
- assessment of corrective measures implemented.

Periodic summaries of grievances and their resolution status will be prepared and included in environmental and social monitoring reports.

## 7.6. Reporting

Stakeholder engagement activities and grievance management will be reported:

- internally, as part of the Project's environmental and social management system;
- to lenders, as part of periodic environmental and social monitoring reports;
- to relevant authorities where required by national legislation or permit conditions.

Reports will typically include:

- summary of engagement activities conducted;
- key issues raised by stakeholders;
- responses and actions taken;
- summary of grievances and their resolution;
- planned engagement activities for the next reporting period.

## 7.7. Review and Update of the SEP

This Stakeholder Engagement Plan is a living document and will be reviewed and updated periodically to reflect:

- changes in project design or schedule;
- changes in stakeholder groups or engagement needs;
- lessons learned from engagement activities;
- feedback received from stakeholders or lenders.

Revised versions of the SEP will be disclosed where required.

# 8. Roles and Responsibilities for Implementation

## 8.1. Overview

Effective implementation of the Stakeholder Engagement Plan requires clear assignment of responsibilities and adequate allocation of resources. Responsibilities for stakeholder engagement will be integrated into the Project's environmental and social management structure.

## 8.2. Project Sponsor Responsibilities

The Project Sponsor will have overall responsibility for:

- ensuring implementation of this SEP;
- ensuring compliance with EBRD requirements;
- providing adequate resources for stakeholder engagement activities;
- overseeing grievance management and reporting;
- coordinating engagement with authorities and key stakeholders.

## 8.3. Environmental and Social Manager

An Environmental and Social Manager (or equivalent role) will be responsible for:

- coordinating stakeholder engagement activities;
- maintaining stakeholder records and consultation logs;
- overseeing implementation of the grievance mechanism;
- preparing engagement and grievance reports;
- ensuring contractors comply with SEP requirements;
- monitoring engagement effectiveness.

This role will act as the primary focal point for environmental and social matters related to stakeholder engagement.

## 8.4. Community Liaison Officer

Where required, a Community Liaison Officer or designated representative will be responsible for:

- maintaining day-to-day communication with local communities;
- supporting organisation of meetings and consultations;
- receiving and recording grievances;
- ensuring timely communication of project information;
- identifying emerging community concerns.

## 8.5. Contractors

During the construction phase, contractors will be responsible for:

- cooperating in the implementation of stakeholder engagement activities;
- providing information on construction schedules and activities;
- assisting in addressing community concerns related to construction;
- ensuring workers are informed about the worker grievance mechanism;
- reporting incidents or community issues to the Project Sponsor.

Contractors will be required to comply with environmental and social requirements specified in their contracts.

## 8.6. Workers and Subcontractors

Workers and subcontractors will be:

- informed about stakeholder engagement and grievance procedures;
- required to comply with the Project Code of Conduct;
- required to report community-related issues to supervisors or designated personnel.

## 8.7. Coordination with Authorities

Local and national authorities will be engaged as necessary to:

- coordinate permitting and regulatory requirements;
- address issues related to infrastructure and public services;
- support communication with local communities where appropriate.

## 8.8. Resources

Adequate financial and human resources will be allocated to ensure effective implementation of stakeholder engagement activities, including:

- preparation and distribution of information materials;
- organisation of consultations and meetings;
- operation of the grievance mechanism;
- monitoring and reporting.

# 9. Conclusion and Commitment to Stakeholder Engagement

The Project Company recognises that effective and meaningful stakeholder engagement is a fundamental element of sound environmental and social management and of sustainable project development. Engagement with project-affected people, local authorities, and other interested stakeholders supports informed decision-making, contributes to the identification and management of environmental and social risks and impacts, and promotes transparent and constructive relationships throughout the Project lifecycle.

This Stakeholder Engagement Plan (SEP) has been prepared in accordance with the requirements of the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2024), in particular Environmental and Social Requirement 10 Stakeholder engagement, on Information Disclosure and Stakeholder Engagement. The SEP establishes a structured approach to stakeholder identification and analysis, disclosure of information, meaningful consultation, operation of a project-level grievance mechanism, and monitoring and reporting of stakeholder engagement activities during all phases of the Project.

The Project Company is committed to:

- Implementing the stakeholder engagement activities described in this SEP in a timely and proportionate manner.
- Providing stakeholders with timely, relevant, and understandable information regarding Project activities and potential impacts.
- Ensuring that stakeholders have opportunities for meaningful consultation and that their views are taken into account in Project planning and implementation.
- Maintaining and operating an accessible and transparent grievance mechanism for project-affected people and other stakeholders.
- Identifying and engaging with vulnerable or disadvantaged groups and applying inclusive engagement methods, where relevant.
- Maintaining records of stakeholder engagement activities and reporting on their outcomes as part of the Project's environmental and social management system.
- Periodically reviewing and updating this SEP to reflect Project developments, stakeholder feedback, and any changes in the Project's environmental and social risk profile.

Stakeholder engagement will be undertaken as an ongoing and adaptive process throughout the Project lifecycle, including construction and operation, and engagement methods will be adjusted as necessary to ensure continued effectiveness and accessibility.

The Project Company will allocate appropriate resources, responsibilities, and trained personnel to implement the commitments set out in this SEP, in accordance with applicable national legislation, EBRD ESRs, and Good International Practice.

# 10. Annexes

## 10.1. Annex 1. Community Grievance Form Template

PROJECT GRIEVANCE FORM (English)

The Project Blue is committed to ensuring that all stakeholders are able to raise concerns, complaints, or suggestions in a safe, transparent, and accessible manner. Grievances may be submitted confidentially or anonymously. The Project will not tolerate any form of intimidation, coercion, or retaliation against individuals submitting grievances in good faith.

Instructions

Please complete this form and submit it using the contact details provided at the end. If assistance is required, project representatives may help complete the form upon request.

1. INFORMATION ABOUT THE COMPLAINANT (Optional if Anonymous)

| | |
|---|---|
| Name and surname: | |
| Organization (if applicable): | |
| Address: | |
| Telephone: | |
| Email: | |
| Preferred method of contact: | ☐ Telephone ☐ Email ☐ Post ☐ No contact requested |

2. CONFIDENTIALITY

Please indicate your preference:

☐ I agree that my name and contact details may be shared with relevant project staff to facilitate resolution.

☐ I request that my identity be kept confidential.

☐ I wish to submit this grievance anonymously.

3. PERSONAL DATA PROTECTION NOTICE

Personal data provided in this form will be used solely for the purpose of processing and responding to this grievance. The information will be stored securely and accessed only by authorised personnel responsible for grievance management. Personal data will not be disclosed to third parties without the complainant's consent, unless required by law or necessary for the resolution of the grievance. Anonymous submissions are accepted.

☐ I acknowledge and agree to the processing of my personal data for the purposes described above.

4. DESCRIPTION OF THE GRIEVANCE

| | |
|---|---|
| Date of incident (if applicable): | Day/month/year |
| Location of incident: | |

Please describe your concern or grievance, including what happened, who was involved, and any relevant details:

Additional information or attachments (if any):

5. DESIRED OUTCOME

Please describe what outcome or solution you are seeking:

6. SENSITIVE OR SAFETY CONCERNS (Optional)

Do you believe that submitting this grievance may expose you or others to any risk or negative consequences?

☐ Yes ☐ No

If yes, please describe (optional):

7. SUPPORTING DOCUMENTS

Please indicate if you are attaching any supporting documents:

☐ Photographs

☐ Correspondence

☐ Maps or sketches

☐ Other: ______________________

8. DECLARATION (Optional for Anonymous Submissions)

I confirm that the information provided in this grievance form is accurate to the best of my knowledge. I understand that the Project will handle this grievance in accordance with its Grievance Redress Mechanism and will take all reasonable measures to ensure confidentiality and protection against retaliation.

| Name: | Signature: | Date: |
|---|---|---|

9. SUBMISSION OF GRIEVANCE

Completed forms and other grievance submissions may be sent to:

Email: projectblue@blessedinvestment.com

Tel: +355 6883 48987

Tel: +355 4 22 58 326

Address: Rr. Themistokli Gërmenji, Nr. 1, Tiranë, Shqipëri

Grievances may also be submitted verbally to project representatives, through local authorities, or via grievance boxes where available.

10. ACKNOWLEDGEMENT, RESPONSE AND ESCALATION

The Project will acknowledge receipt of the grievance within a defined timeframe, typically within 3 to 7 working days. The grievance will be reviewed, and a response or proposed resolution will be provided within a reasonable period, depending on the nature and complexity of the issue. The complainant will be informed of progress throughout the process.

If the complainant is not satisfied with the proposed resolution, or if no response is received within the specified timeframe, the complainant may request further review at a higher level within the Project. The use of this Grievance Redress Mechanism does not prevent complainants from seeking resolution through other administrative or judicial procedures in accordance with applicable national legislation.

11. FOR PROJECT USE ONLY (INTERNAL SECTION)

| | |
|---|---|
| Grievance reference number: | |
| Date received: | |
| Received by: | |
| Method of submission: | |
| Confidentiality level: | ☐ Public ☐ Confidential ☐ Restricted handling |
| Category of grievance: | ☐ Environmental ☐ Social ☐ Health and safety ☐ Land and assets ☐ Employment ☐ Other |
| Action taken: | |
| Date of response: | |
| Date of closure: | |
| Status: | ☐ Open ☐ Under review ☐ Resolved ☐ Closed |

FORMULAR PËR PARAQITJEN DHE TRAJTIMIN E ANKESAVE TË PROJEKTIT (Shqip)

Projekti Blue angazhohet të sigurojë që të gjitha palët e interesuara të kenë mundësinë të paraqesin shqetësime, ankesa ose sugjerime në mënyrë të sigurt, transparente dhe të aksesueshme. Ankesat mund të paraqiten në mënyrë konfidenciale ose anonime. Projekti nuk do të tolerojë asnjë formë frikësimi, presioni, diskriminimi apo hakmarrjeje ndaj individëve që paraqesin ankesa në mirëbesim.

Udhëzime për plotësimin e formularit

Ky formular duhet të plotësohet dhe të dorëzohet duke përdorur të dhënat e kontaktit të paraqitura në fund të dokumentit. Në rast se kërkohet ndihmë për plotësimin e formularit, përfaqësuesit e Projektit mund të ofrojnë asistencë sipas kërkesës.

1. TË DHËNA MBI ANKUESIN

(Plotësimi i këtij seksioni është opsional në rast se ankesa paraqitet në mënyrë anonime.)

| | |
|---|---|
| Emri dhe mbiemri: | |
| Institucioni/Organizata (nëse është e aplikueshme): | |
| Adresa: | |
| Numri i telefonit: | |
| Adresa e emailit: | |
| Mënyra e preferuar e kontaktit: | ☐ Telefon ☐ Email ☐ Postë ☐ Nuk kërkohet kontakt |

2. KONFIDENCIALITETI

Ju lutemi të përcaktoni preferencën tuaj lidhur me trajtimin e të dhënave personale:

☐ Jam dakord që emri dhe të dhënat e mia të kontaktit të përdoren dhe të ndahen me personelin përkatës të Projektit për qëllime të trajtimit dhe zgjidhjes së ankesës.

☐ Kërkoj që identiteti im të trajtohet në mënyrë konfidenciale.

☐ Dëshiroj ta paraqes këtë ankesë në mënyrë anonime.

3. NJOFTIM PËR MBROJTJEN E TË DHËNAVE PERSONALE

Të dhënat personale të dhëna në këtë formular do të përdoren vetëm për qëllimin e shqyrtimit dhe trajtimit të ankesës. Informacioni do të ruhet në mënyrë të sigurt dhe do të jetë i aksesueshëm vetëm për personelin e autorizuar përgjegjës për administrimin e mekanizmit të menaxhimit të ankesave. Të dhënat personale nuk do t'u publikohen palëve të treta pa pëlqimin e ankuesit, përveç rasteve kur kjo kërkohet nga legjislacioni në fuqi ose kur është e nevojshme për zgjidhjen e ankesës. Pranohen edhe ankesa anonime.

☐ Konfirmoj se jam informuar dhe jap pëlqimin për përpunimin e të dhënave të mia personale për qëllimet e përshkruara më sipër.

4. PËRSHKRIMI I ANKESËS

| | |
|---|---|
| Data e ngjarjes (nëse është e aplikueshme): | *Dita/muaji/viti* |
| Vendndodhja e ngjarjes: | |

Ju lutemi përshkruani shqetësimin ose ankesën, duke bërë përshkrimin e ngjarjes, personat e përfshirë dhe çdo informacion tjetër të rëndësishëm:

Informacion shtesë ose dokumente mbështetëse (nëse ka):

5. REZULTATI I KËRKUAR

Ju lutemi përshkruani rezultatin ose zgjidhjen që kërkoni:

6. ÇËSHTJE TË NDJESHME OSE RREZIQE TË MUNDSHME (OPSIONALE)

A mendoni se paraqitja e kësaj ankese mund t'ju ekspozojë ju ose persona të tjerë ndaj ndonjë rreziku apo pasoje negative?

☐ Po ☐ Jo

Nëse po, ju lutemi përshkruani (opsionale):

7. DOKUMENTE MBËSHTETËSE

Ju lutemi të tregoni nëse po bashkëngjitni dokumente mbështetëse:

☐ Fotografi

☐ Korrespondencë

☐ Harta ose skica

☐ Të tjera: ______________________

8. DEKLARATË

Deklaroj se informacioni i dhënë në këtë formular është i saktë sipas njohurive të mia më të mira. Jam i/e informuar se ankesa do të trajtohet në përputhje me Mekanizmin e Menaxhimit të Ankesave të Projektit dhe se do të merren masa të arsyeshme për të garantuar konfidencialitetin dhe mbrojtjen nga çdo formë hakmarrjeje.

| | | |
|---|---|---|
| Emri: | Nënshkrimi: | Data: |

9. PARAQITJA E ANKESËS

Formulari i plotësuar dhe çdo dokument shoqërues mund të dorëzohen në një nga mënyrat e mëposhtme:

Email: projectblue@blessedinvestment.com

Tel: +355 6883 48987

Tel: +355 4 22 58 326

Adresa: Rr. Themistokli Gërmenji, Nr. 1, Tiranë, Shqipëri

Ankesat mund të paraqiten gjithashtu në mënyrë verbale tek përfaqësuesit e Projektit, përmes autoriteteve vendore ose përmes kutive të ankesave, kur këto janë të disponueshme.

10. KONFIRMIMI I MARRJES, SHQYRTIMI DHE PËRSHKALLËZIMI

Marrja e ankesës do të konfirmohet brenda një afati të arsyeshëm, zakonisht brenda 3 deri në 7 ditë pune. Ankesa do të shqyrtohet dhe do të jepet një përgjigje ose zgjidhje e propozuar brenda një periudhe të arsyeshme, në varësi të natyrës dhe kompleksitetit të çështjes. Ankuesi do të informohet për ecurinë e procesit.

Në rast se ankuesi nuk është i kënaqur me zgjidhjen e propozuar ose nuk merr përgjigje brenda afatit të përcaktuar, ai/ajo ka të drejtë të kërkojë rishqyrtim në një nivel më të lartë brenda strukturave të Projektit. Përdorimi i këtij mekanizmi nuk kufizon të drejtën për t'iu drejtuar autoriteteve administrative ose gjyqësore në përputhje me legjislacionin në fuqi.

*11. PËR PËRDORIM ZYRTAR NGA PROJEKTI*

| | |
|---|---|
| Numri i referencës së ankesës: | |
| Data e marrjes: | |
| Marrë nga: | |
| Mënyra e paraqitjes: | |
| Niveli i konfidencialitetit: | ☐ Publik ☐ Konfidencial ☐ Trajtim i kufizuar |
| Kategoria e ankesës: | ☐ Mjedisore ☐ Sociale ☐ Shëndet dhe siguri ☐ Tokë dhe pasuri ☐ Punësim ☐ Të tjera |
| Veprimet e ndërmarra: | |
| Data e përgjigjes: | |
| Data e mbylljes: | |
| Statusi: | ☐ Hapur ☐ Në shqyrtim ☐ Zgjidhur ☐ Mbyllur |

## 10.2. Annex 2. Grievance Log Template

| Reference No. | Date Received | Stakeholder Type | Description of Issue | Action Taken | Date Resolved | Status |
|---|---|---|---|---|---|---|
| | | | | | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | |

This log should be maintained by the Environmental and Social Manager and reviewed periodically.

### 10.3. Annex 3. Consultation Log Template

| Date | Location | Stakeholder Group | Number of Participants | Key Issues Raised | Actions / Follow-up |
|---|---|---|---|---|---|
| | | | | | |
| | | | | | |
| | | | | | |

Consultation records should be supported, where possible, by:

- attendance sheets,
- meeting minutes,
- photographs or presentation materials.

### 10.4. Annex 4. Stakeholder Register Template

This register should be reviewed and updated periodically throughout the Project Lifecycle.

Supporting Sheets (Data Inputs)

# Sheet 2: Stakeholder Engagement Log

| Date | Location | Stakeholder Group | Participants | Female | Male | Youth | Vulnerable | Issues Raised |
|---|---|---|---|---|---|---|---|---|

👉 Feeds:

- Gender participation KPI
- Participation KPI
- Vulnerable engagement KPI

---

# Sheet 3: Grievance Log

| ID | Date Received | Type | Stakeholder | Status | Date Closed | Days to Close | Within 30 Days (Y/N) |
|---|---|---|---|---|---|---|---|

👉 Feeds:

- Resolution rate
- Resolution time
- Trends

---

## Sheet 4: Communication Log

| Date | Stakeholder | Type (Inquiry) | Response Date | Response Time (days) | Within 10 Days (Y/N) |
|---|---|---|---|---|---|

👉 Feeds:

- Response performance (external communication)

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## Sheet 5: Employment Tracking

| Month | Total Workers | Local Workers | Female Workers | Skilled | Unskilled |
|---|---|---|---|---|---|

👉 Feeds:

- Local hire KPI
- Female employment KPI

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## Sheet 6: Awareness Survey

| Date | Location | Respondents | Aware of GRM (Yes/No) |
|---|---|---|---|

👉 Feeds:

- GRM awareness KPI

### 10.5. Annex 5. Stakeholder Engagement Schedule

Stakeholder engagement activities presented in the table below have been defined in accordance with the EBRD Environmental and Social Policy (2024), in particular ESR 10 and ESR 1, and are aligned with the current development stages of the Blue Solar and BESS projects. The nature and frequency of engagement are proportionate to the level of project activity, potential environmental and social risks, and stakeholder interest at each phase.

For projects in operation (Blue 1 and Blue 2 – Phase 1), engagement activities focus primarily on maintaining communication with local communities and authorities, addressing any operational concerns, and ensuring the continued functioning of the grievance mechanism.

For projects under construction (Blue 2 – Phase 2), stakeholder engagement places greater emphasis on regular communication with nearby residents and municipal authorities, disclosure of construction schedules and transport activities, and timely response to concerns related to traffic, noise, dust, and temporary disturbance, in line with ESR 4 requirements.

For projects in permitting or pre-construction stages (Blue 3), engagement activities are centred on disclosure of project information, consultation with relevant stakeholders and authorities, and documentation of feedback to support the environmental and social assessment process in accordance with ESR 1 and ESR 10, ESR 5.

Across all projects and phases, stakeholder engagement remains an ongoing process that includes maintaining an accessible grievance mechanism, monitoring stakeholder concerns, and periodically reviewing and updating the Stakeholder Engagement Plan to reflect project progress and any changes in risks or impacts, including those related to transport safety and cultural heritage considerations where relevant.

**Table 6 Stakeholder Engagement Activities, Methods and Responsibilities**

| **Activity** | **Methods** | **Frequency / Stage** | **Responsibility** | **Outputs** |
|---|---|---|---|---|
| Disclosure of project information (design, schedule, activities) | Information sheets, written notices, communication through municipalities, electronic communication where appropriate | Pre-construction and when significant updates occur | Project Proponent / E&S Team | Disclosure records, copies of materials |
| Disclosure of construction schedule, traffic arrangements and potential disturbances | Notices to communities and local authorities, coordination meetings | Prior to and during construction, as required | Contractor and Project E&S Team | Communication records, notices issued |
| Consultation with local authorities and relevant institutions | Meetings, coordination sessions, official correspondence | All phases, as required | Project Management / E&S Team | Meeting minutes, correspondence records |
| Engagement with nearby communities and land users | Community meetings, informal consultations, targeted communication along transport routes | Construction and operation phases, as needed | Contractor / Community Liaison / E&S Team | Consultation records, stakeholder database updates |

| Activity | Methods | Frequency / Stage | Responsibility | Outputs |
|---|---|---|---|---|
| Communication regarding transport activities and traffic safety (ESR 4) | Advance notification, signage where relevant, consultation with authorities and residents along main roads | Prior to transport campaigns and during construction | Contractor / E&S Team | Communication records, traffic notices |
| Consultation with cultural heritage authorities if relevant (ESR 8) | Meetings, formal communication, coordination on chance-find procedures | Pre-construction and during works if required | Project Management / E&S Team | Consultation records, correspondence |
| Operation-phase communication and disclosure of relevant E&S information | Periodic updates, communication through local authorities, stakeholder contact points | Operation phase | Operator / E&S Team | Communication records, periodic reports |
| Implementation and maintenance of grievance mechanism | Grievance forms, email, phone contact, grievance log and tracking system | All phases | Project Proponent / E&S Team | Grievance register, response records |
| Identification and targeted engagement of vulnerable or sensitive stakeholders (if identified) | Tailored communication, direct meetings where necessary | As required | E&S Team | Records of targeted engagement |
| Monitoring and documentation of stakeholder concerns | Internal tracking, periodic review meetings | All phases | E&S Team | SEP monitoring notes |
| Periodic review and update of SEP | Internal review, integration of feedback and project changes | At key project milestones or annually | Project Proponent / E&S Team | Updated SEP, stakeholder engagement reports |
| Reporting to lenders and authorities | Periodic E&S reporting, submission | As required by financing agreements | Project Proponent | Periodic stakeholder |

| Activity | Methods | Frequency / Stage | Responsibility | Outputs |
|---|---|---|---|---|
| | of engagement summaries | | | engagement reports |

## 10.6. Annex 6. WORKERS' GRIEVANCE MECHANISM (GRM)

| ENGLISH | ALBANIAN (SHQIP) |
|---|---|
| **WORKERS' GRIEVANCE MECHANISM (GRM)** | MEKANIZMI I ANKESAVE TË PUNONJËSVE (GRM) |
| **1. YOUR VOICE MATTERS** | 1. ZËRI JUAJ KA RËNDËSI |
| **2. You have the right to speak up** | 2. Ju keni të drejtë të shpreheni |
| **All workers can raise concerns or complaints safely, confidentially, and without fear of retaliation.** | Të gjithë punonjësit mund të paraqesin shqetësime ose ankesa në mënyrë të sigurt, konfidenciale dhe pa frikë nga hakmarrja. |
| **3. WHAT CAN YOU REPORT?** | 3. ÇFARË MUND TË RAPORTONI? |
| **• Unsafe working conditions** | • Kushte të pasigurta pune |
| **• Health and safety concerns** | • Shqetësime për shëndetin dhe sigurinë |
| **• Harassment or unfair treatment** | • Ngacmim ose trajtim i padrejtë |
| **• Wage or contract issues** | • Probleme me pagën ose kontratën |
| **• Any workplace-related concern** | • Çdo shqetësim që lidhet me vendin e punës |
| **4. HOW TO SUBMIT A GRIEVANCE** | 4. SI TË PARAQISNI NJË ANKESË |
| 📥 **Grievance Box** | 📥 Kuti e ankesave |
| **Submit a written complaint, anonymous submissions are allowed** | Paraqisni një ankesë me shkrim, lejohen edhe ankesa anonime |
| 📞 **Phone** | 📞 Telefon |
| **[Insert Phone Number]** | [Vendosni numrin e telefonit] |
| 📧 **Email** | 📧 Email |
| **[Insert Email Address]** | [Vendosni adresën e emailit] |
| 👤 **In Person** | 👤 Personalisht |

| | |
|---|---|
| **Speak to your supervisor or E&S representative** | Flisni me mbikëqyrësin tuaj ose përfaqësuesin e Mjedisit dhe Socialit (E&S) |
| **5. WHAT HAPPENS NEXT?** | 5. ÇFARË NDODH MË PAS? |
| **• Your complaint will be registered** | • Ankesa juaj do të regjistrohet |
| **• It will be reviewed promptly** | • Do të shqyrtohet menjëherë |
| **• You will receive a response within [X] days** | • Do të merrni përgjigje brenda [X] ditësh |
| **• All cases are handled confidentially** | • Të gjitha rastet trajtohen në mënyrë konfidenciale |
| **6. IMPORTANT INFORMATION** | 6. INFORMACION I RËNDËSISHËM |
| **• You can remain anonymous** | • Mund të mbeteni anonim |
| **• You will not face retaliation** | • Nuk do të përballeni me hakmarrje |
| **• The process is free of charge** | • Procesi është pa pagesë |
| **• Support is available in multiple languages** | • Mbështetje ofrohet në disa gjuhë |
| **7. CONTACT DETAILS** | 7. TË DHËNAT E KONTAKTIT |
| **GRM Focal Point: [Insert Name / Position]** | Pika e kontaktit për GRM: [Vendosni emrin / pozicionin] |
| **Location: [Insert Office / Site]** | Vendndodhja: [Vendosni zyrën / vendin] |
| **8. APPROVAL AUTHORITY** | 8. AUTORITETI MIRATUES |
| **This grievance mechanism is implemented and overseen by:** | Ky mekanizëm i ankesave zbatohet dhe mbikëqyret nga: |
| **Project Management / Company Name: [Insert Name]** | Menaxhimi i Projektit / Emri i Kompanisë: [Vendosni emrin] |
| **Environmental & Social (E&S) Manager: [Insert Name / Position]** | Menaxheri i Mjedisit dhe Socialit (E&S): [Vendosni emrin / pozicionin] |
| **Approval Date: [Insert Date]** | Data e miratimit: [Vendosni datën] |
| **NOTICE** | NJOFTIM |
| **This grievance mechanism is available to all workers, including contractors and subcontractors.** | Ky mekanizëm i ankesave është i disponueshëm për të gjithë punonjësit, përfshirë kontraktorët dhe nënkontraktorët. |

## 10.7. Annex 7. WORKERS' GRIEVANCE SUBMISSION FORM

**WORKERS' GRIEVANCE SUBMISSION FORM / FORMULARI I PARAQITJES SË ANKESAVE TË PUNONJËSVE**

**1. General Information / Informacion i Përgjithshëm**

**Date of Submission / Data e paraqitjes: ___________________________**

**Location / Site / Vendndodhja / Kantieri: ___________________________**

**Reference Number (office use) / Numri i referencës (përdorim zyrtar):**

**___________________________**

**2. Complainant Details (Optional) / Të dhënat e ankuesit (opsionale)**

**(You may leave this section blank if you wish to remain anonymous)**

**(Këtë pjesë mund ta lini bosh nëse dëshironi të mbeteni anonim)**

**Name / Emri: ___________________________**

**Position / Job Title / Pozicioni / Titulli i punës: ___________________________**

**Employer (Company / Contractor) / Punëdhënësi (Kompania / Kontraktori):**

**___________________________**

**Phone Number / Numri i telefonit: ___________________________**

**Email Address / Adresa e emailit: ___________________________**

**☐ I wish to remain anonymous / Dëshiroj të mbetem anonim**

**3. Type of Grievance / Lloji i ankesës (tick one or more / shënoni një ose më shumë)**

**☐ Health and Safety / Shëndeti dhe siguria**

**☐ Working Conditions / Kushtet e punës**

**☐ Harassment / Discrimination / Ngacmim / Diskriminim**

**☐ Wages / Payments / Pagat / Pagesat**

**☐ Contract / Employment Terms / Kontrata / Kushtet e punësimit**

**☐ Environmental Issue / Çështje mjedisore**

**☐ Other / Tjetër: ___________________________**

**4. Description of the Grievance / Përshkrimi i ankesës**

Please describe your concern in detail (what happened, where, when, who was involved):

Ju lutemi përshkruani shqetësimin tuaj në detaje (çfarë ndodhi, ku, kur, kush ishte i përfshirë):

5. Date(s) of Incident / Data(t) e incidentit

6. Have you reported this issue before? / A e keni raportuar këtë çështje më parë?

☐ Yes / Po

☐ No / Jo

If yes, please provide details / Nëse po, jepni detaje:

7. What outcome or resolution do you expect? / Çfarë zgjidhjeje ose rezultati prisni?

8. Preferred Method of Communication / Mënyra e preferuar e komunikimit

☐ Phone / Telefon

☐ Email / Email

☐ In person / Personalish

☐ No response required (anonymous follow-up) / Nuk kërkohet përgjigje (ndjekje anonime)

9. Confidentiality Request / Kërkesë për konfidencialitet

☐ I request that my identity remains confidential / Kërkoj që identiteti im të mbetet konfidencial

10. Signature (if not anonymous) / Nënshkrimi (nëse nuk është anonim)

Signature / Nënshkrimi: ___________________________

Date / Data: ___________________________

FOR OFFICIAL USE ONLY / PËR PËRDORIM ZYRTAR

Grievance Received By / Ankesa u pranua nga: ___________________________

Date Received / Data e pranimit: ___________________________

Assigned To / Caktuar për: ___________________________

**Category / Kategoria:** ___________________________

**Action Taken / Veprimi i ndërmarrë:** ____________________________________

**Response Date / Data e përgjigjes:** ___________________________

**Status / Statusi:** ☐ **Open / Hapur** ☐ **In Progress / Në proces** ☐ **Closed / Mbyllur**

**IMPORTANT NOTICE / NJOFTIM I RËNDËSISHËM**

**Submitting a grievance will not result in retaliation / Paraqitja e një ankese nuk do të sjellë pasoja negative**

**All grievances are handled confidentially / Të gjitha ankesat trajtohen në mënyrë konfidenciale**

**Anonymous complaints are accepted / Pranohen ankesa anonime**

## 10.8. Annex 8. Formal reporting templates designed specifically for inclusion in monthly, quarterly and annual Management Reports

1. Monthly Reporting Template (Operational Dashboard)

A. Engagement Activities

| Indicator | This Month | Cumulative | Notes |
|---|---|---|---|
| **Number of engagement activities** | | | Type, location, purpose |
| **Types of stakeholders engaged** | | | Community, authorities, NGOs |

B. Grievance Management

| Indicator | This Month | Previous Month | Trend | Notes |
|---|---|---|---|---|
| **Grievances received** | | | ↑ / ↓ | By type of issue |
| **Grievances resolved** | | | | |
| **Resolution rate (%)** | | | | Target ≥ 90% |
| **Average resolution time (days)** | | | | Target compliance |

C. Key Issues and Actions

| Issue Raised | Category | Action Taken | Status |
|---|---|---|---|
| | | | Open / Closed |

2. Quarterly Reporting Template (Performance Dashboard)

A. Participation and Inclusiveness

| Indicator | Q Value | Previous Q | Target | Status |
|---|---|---|---|---|
| **Total participants** | | | Monitoring | |
| **Female participation rate (%)** | | | ≥ 30% | ✓ / ✕ |
| **Vulnerable group participation** | | | Monitoring | |

B. Engagement Coverage

| Indicator | Q Value | Target | Status | Notes |
|---|---|---|---|---|
| **Total engagement activities** | | Monitoring | | By stakeholder type |
| **Activities targeting vulnerable groups** | | ≥ 1 per quarter | ✓ / ✕ | |

C. Grievance Performance

| Indicator | Q Value | Target | Status |
|---|---|---|---|
| **Total grievances** | | Monitoring | |
| **Resolution rate (%)** | | ≥ 90% | ✓ / ✕ |
| **Average resolution time** | | Within timeframe | ✓ / ✕ |

D. Employment Indicators

| Indicator | Q Value | Target | Status | Notes |
|---|---|---|---|---|
| **% Local hires** | | 40–50% | ✓ / ✕ | By job type |
| **Female employment rate** | | ≥ 10–20% | ✓ / ✕ | By category |

E. Information Disclosure

| Indicator | Q Value | Notes |
|---|---|---|
| **Number of materials disclosed** | | Type, location |

F. Quarterly Analysis Summary

- Key trends observed:
- Main challenges:
- Corrective actions planned:

3. Annual Reporting Template (Strategic Review)

A. Overall Performance Summary

| Indicator | Annual Value | Target | Status |
|---|---|---|---|
| **Female participation rate** | | ≥ 30% | ✓ / ✕ |
| **Grievance resolution rate** | | ≥ 90% | ✓ / ✕ |
| **Awareness of grievance mechanism (%)** | | ≥ 70% | ✓ / ✕ |
| **% Local hires** | | 50–70% | ✓ / ✕ |
| **Female employment rate** | | ≥ 10–20% | ✓ / ✕ |

B. Stakeholder Engagement Effectiveness

- Total engagement activities conducted:
- Total participants reached:
- Inclusiveness assessment:

C. Grievance Mechanism Review

| Indicator | Annual Value | Notes |
|---|---|---|
| **Total grievances received** | | |
| **Total resolved** | | |
| **Average resolution time** | | |
| **Common grievance types** | | |

D. Awareness and Communication

- Awareness level of grievance mechanism:
- Effectiveness of communication channels:
- Improvements required:

E. Key Risks and Issues

| Risk/Issue | Impact | Mitigation Measures | Status |
|---|---|---|---|
| | | | |
| | | | |

F. Lessons Learned and Recommendations

- Lessons learned:

- Best practices:
- Recommended improvements:
- Proposed updates to targets or approach:

4. Stakeholder Engagement Summary

A. Performance Overview

| Indicator | Status | Remarks |
|---|---|---|
| **Female Participation Rate** | ☐ Achieved ☐ Partially Achieved ☐ Not Achieved ☐ Not Applicable | Compared to ≥ 30% target |
| **Grievance Resolution Rate** | ☐ Achieved ☐ Partially Achieved ☐ Not Achieved ☐ Not Applicable | Compared to ≥ 90% target |
| **Local Hiring** | ☐ Achieved ☐ Partially Achieved ☐ Not Achieved ☐ Not Applicable | Compared to 30%–50% target |
| **Vulnerable Group Engagement** | ☐ Achieved ☐ Partially Achieved ☐ Not Achieved ☐ Not Applicable | Minimum one activity per quarter |

Note: "Achieved" indicates target met, "Partially Achieved" indicates progress but below target, "Not Achieved" indicates target not met, and "Not Applicable" indicates no relevant data or activity during the reporting period.

B. Key Issues Identified During the Reporting Period

☐ Nothing to report

- [Insert key issue, including brief description and affected stakeholder group]
- [Insert key issue, including brief description and affected stakeholder group]
- [Insert key issue, including brief description and affected stakeholder group]

C. Key Actions Implemented

☐ Nothing to report

- [Insert action taken to address stakeholder concerns or grievances]
- [Insert action taken to improve engagement or communication]
- [Insert action taken to mitigate risks or resolve issues]

D. Summary Assessment

☐ Nothing to report

A concise assessment of stakeholder engagement performance during the reporting period should be provided here, highlighting overall trends, key risks, and effectiveness of mitigation measures. This section should indicate whether stakeholder engagement objectives are being met and identify any areas requiring management attention.