

Independent Project Accountability Mechanism

Assessment Report

KAZREF II – Shokpar Wind

EBRD Project Number 52946 Case 2024/05

March 2025

The Independent Project Accountability Mechanism (IPAM) is the European Bank for Reconstruction and Development's (EBRD) accountability mechanism. IPAM independently reviews issues raised by individuals or organisations concerning Bank-financed projects that are believed to have caused or be likely to cause harm. The purpose of the mechanism is to facilitate the resolution of social, environmental, and public disclosure issues among project stakeholders; to determine whether the Bank has complied with its Environmental and Social Policy and the project-specific provisions of its Access to Information Policy; and, where applicable, to address any existing noncompliance with these policies, while preventing future non-compliance by the Bank.

For more information about IPAM, contact us or visit <u>www.ebrd.com/project-finance/ipam.html</u>

Contact information	How to submit a complaint to the IPAM
The Independent Project Accountability	Concerns about the environmental and social
Mechanism (IPAM)	performance of an EBRD Project can be
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Unless otherwise indicated capitalised terms used in this report are those as set forth in the 2019 Project Accountability Policy.

# LIST OF ABREVIATIONS

Abbreviation	Long Form
AIIB	Asian Infrastructure Investment Bank
Board	the Board of Directors of the European Bank for Reconstruction and Development
Case	the consideration of a Request under the Project Accountability Policy following its registration
CAO	the Chief Accountability Officer of the EBRD, and IPAM head
Case Registry	the registry of Cases created in accordance with Section III, Paragraph 3.1 of the Project Accountability Policy, which can be found on the <u>IPAM Webpage</u>
Client	Shokpar Wind Power Station LLP a special purpose entity incorporated in the Republic of Kazakhstan to implement the project
Compliance	the IPAM function which determines whether EBRD has complied with its Environmental and Social Policy or the Project-specific provisions of its Access to Information Policy in respect of a Project
EBRD (or Bank)	the European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESP	the EBRD's Environmental and Social Policy in force at the time of Project approval
IPAM	the Independent Project Accountability Mechanism of the EBRD established as per the 2019 Project Accountability Policy
IPAM Head	the EBRD Chief Accountability Officer responsible for the running of IPAM, the implementation of the Project Accountability Policy and for making the decisions that are the responsibility of IPAM under said Policy
NTS	Non-Technical Summary
PAP	the 2019 Project Accountability Policy
Parties	the individuals, entities, and/or organisations with a direct interest in a Case. Parties may include (but are not limited to): the Requesters; their Representatives, if any; the relevant Bank department, team, or unit; the Client; and other Project financiers or other entities responsible for the implementation of a Project
Problem Solving	the IPAM function which supports voluntary dispute resolution engagement between Requesters and Clients to resolve the environmental, social, and public disclosure issues raised in a Request, without attributing blame or fault.
PSD	Project Summary Document
President	the President of the EBRD

### **Executive Summary**

### The Request<sup>1</sup>

On 29 May 2024, the Biodiversity Research and Conservation Centre Community Trust from Kazakhstan submitted a <u>Request</u> to IPAM regarding <u>KAZREF II - Shokpar Wind (52946)</u> (the Project). Requesters are raising concerns regarding risk of collusion of threatened species of birds with the wind turbines. Additionally, the Request alleges that the Project was inappropriately assigned as category B and missed to assess potential impacts on biodiversity. Requesters expressed interest in Problem Solving and Compliance.

#### The Project<sup>2</sup>

The <u>KAZREF II - Shokpar Wind (52946)</u> Project is a senior loan of up to US\$ 50 million to Shokpar Wind Power Station LLP (the Client) for the development, construction, and operation of a wind power plant with an installed capacity of 100MW located in Sarysu district of Zhambyl region. The Project will support Kazakhstan in its objective to increase the share of renewable energy in the energy mix, contribute to reducing Kazakhstan's carbon intensity, and address the country's increasing electricity demand. The Project has been categorized as B under 2019 Environmental and Social Policy, and its current status is signed.

#### **IPAM Process**

On 13 May 2024 Requesters submitted their Request to the accountability mechanism of the Asian Infrastructure and Investment Bank (AIIB), which was then forwarded to IPAM for review considering the mutual reliance agreement between EBRD and AIIB. After screening the Request against registration criteria set by the <u>2019 Project Accountability Policy (PAP)</u>, on 17 July 2024 IPAM suspended its registration decision to allow EBRD management and the Client to engage with the Requesters to try and address their concerns. During the Request suspension period, IPAM monitored the status of Parties' engagement and on 22 October 2024 decided to register the Request as the issues raised haven't been resolved.

The Request was registered and publicly disclosed in the IPAM Case Registry under <u>Case 2024/05</u> initiating the Assessment stage that was conducted until February 2025 in accordance with the PAP. IPAM undertook an in-depth analysis of the Request and reviewed the additional documentation provided by the Parties, held online meetings with the Bank team responsible for the Project, representatives of the Client, and the Requesters and facilitated a virtual joint meeting of Parties on 30 January 2025.

#### **Conclusion and Next Steps**

Based on the activities undertaken during the Assessment stage, IPAM determined that Case will proceed to Problem Solving, as all relevant Parties (the Requester, Client, and Bank management) have expressed their willingness to engage in IPAM's Problem Solving function. Given these findings, this Report includes preliminary Terms of Reference for Problem Solving whereby the proposed scope, methods to be used, the timeframe and the type of expertise required are presented.

IPAM wishes to thank the Requesters, the Client, and Bank management for their time and inputs provided during the Assessment stage. This Assessment Report is circulated to the Parties and disclosed in the virtual case file for <u>Case 2024/05</u>, in English after its submission to the Board and the President for information. After that, the Case will be transferred to the Problem-Solving stage.

<sup>&</sup>lt;sup>1</sup> The Request is available <u>here</u>

<sup>&</sup>lt;sup>2</sup> EBRD's Project Summary Document is available here

## 1. Background

### 1.1. The Request<sup>3</sup>

On 29 May 2024, IPAM received a <u>Request</u> from the Biodiversity Research and Conservation Centre Community Trust (the Requesters), in Kazakhstan. Requesters raised concerns regarding risk of collision of threatened species of birds with the wind turbines as part of the EBRD funded <u>KAZREF II –</u> <u>Shokpar Wind (52946)</u>. Additionally, the Request alleges that the Project was inappropriately categorized as B and missed to assess potential impacts on biodiversity.

The Requesters informed IPAM that in August 2023 they initiated discussions with the EBRD Client regarding the categorization of the Project and suggested potential mitigation measures to protect birds from wind turbines. In their discussions with the Client, Requesters raised concerns about the Project design for the Shokpar Wind Power Station, emphasizing that it lacks bird detection systems that would automatically stop the operation of wind turbines when birds would approach the turbines. They stressed on the importance of incorporating innovative technology that can prevent bird collisions, which in their view is a critical consideration for environmental protection in wind energy projects. However, Requesters claim that none of their requests regarding mitigation measures have been accepted by the Client, and that they monitored the Project area for a long period of time and found dead birds in the vicinity of the wind turbines. The Request is summarised in the table below which broadly raises the following issues:

Issues raised	Allegations	Related PRs
Impacts on biodiversity	<ul> <li>Project design lacks bird detection system capable of automatically stopping turbines to prevent bird collisions.</li> <li>Lack of adequate measures has resulted in bird fatalities in the vicinity of wind turbines.</li> </ul>	PR 1 PR 6
Project categorization	• The Project was inappropriately categorized as B, leading to insufficient assessments of impacts on biodiversity.	PR 1

### 1.2. The Project and its Current Status<sup>4</sup>

The <u>KAZREF II – Shokpar Wind (52946)</u> is a senior loan of up to USD 50 million to Shokpar Wind Power Station LLP for the development, construction, and operation of a wind power plant with an installed capacity of 100MW located in Sarysu district of Zhambyl region. The Project will support Kazakhstan in its objective to increase the share of renewable energy in the energy mix, contribute to reducing Kazakhstan's carbon intensity, and address the country's increasing electricity demand. The Project has been categorized as B under 2019 Environmental and Social Policy, and its current status is signed.

According to the <u>Project Summary Document</u>, the Shokpar WPP site is not located in environmentally and/or socially sensitive areas, and there are no protected or designated nature reserves within a 30-km radius of the Project. The Project environmental and social due diligence included detailed review of the potential impacts on avifauna and need for mitigation measures based on a bird collision risk assessment, undertaken in consultations with international bird experts. Biodiversity baseline surveys were conducted within the 1500 ha site allocated for the WPP and within a 2km buffer around the site for some ornithology receptors and included information on all species present at the site, including red lists species. Further habitat survey of the Shokpar WPP using the relevant EUNIS classifications follow to be undertaken including Critical Habitat Assessment. A project Biodiversity Management Plan will be produced outlining all the impact mitigation, management, and post construction monitoring protocols at Shokpar WPP facility, to benefit the species' conservation and to demonstrate no net loss for the species concerned, through minimisation of habitat fragmentation, creation of biological

<sup>&</sup>lt;sup>3</sup> The Request is available in the case summary at: <u>Case 2024/05</u>

<sup>&</sup>lt;sup>4</sup> The information is sourced from the EBRD's Project Summary Document available <u>here</u> and the Non-Technical Summary available <u>here</u>

corridors, restoration of habitats during operations and/or after operations and implementation of biodiversity offsets.



Figure 1 - General Location of the Project, Southern Kazakhstan

Figure 2 - Layout of the100MW Shokpar WPP



Source: Non-technical Summary

#### 1.3. Case Processing to Date

The Request was originally submitted to the accountability mechanism of the Asian Infrastructure and Investment Bank (AIIB) on 13 May 2024 which was forwarded to IPAM on 29 May 2024 under the mutual reliance agreement between EBRD and AIIB. On 17 July 2024 IPAM temporarily suspended the registration of the Request to allow EBRD management and the Client an opportunity to engage with Requesters to try and address their concerns. During the suspension period, IPAM monitored the status of Parties' engagement and decided to register the Request as the issues raised haven't been resolved.

The Request was registered by IPAM on 22 October 2024 as <u>Case 2024/05</u> as it met the criteria for Registration established in Section 2.2 (b) of the PAP, and none of the exclusions set in Section 2.2.(c) of the PAP applied. The registration of a Request is an administrative step<sup>5</sup> establishing that the following criteria have been met:

• all mandatory information has been provided;

<sup>&</sup>lt;sup>5</sup> Registration of a Request does not involve a judgement on the merits, truthfulness, or correctness of its content. Nor does it have the effect of suspending the Bank's interest in a project.

- issues raised relate to specific obligations of the Bank under the Environmental and Social Policy and/or the project-specific provisions of the Access to Information Policy.
- it relates to a project that the Bank has approved; and
- the Request is related to an active project or is submitted within 24 months of the date in which the Bank has ceased to have a financial interest in the project.

## 2. Assessment Stage

Immediately after registration, the Request was transferred to the Assessment Stage as established in para. 2.3 of the 2019 PAP, for IPAM to:

- develop a clear understanding of the issues raised in the Request;
- discuss the Problem Solving and Compliance functions with the Parties, their scope, and outcomes;
- assess the Parties' willingness to engage in each function;
- consider the updated status of other grievance resolution efforts, if applicable; and
- make a final determination with three alternative outcomes:
  - the Case could proceed to Problem Solving, based on the agreement of the Requesters and the Client; or
  - the Case would be transferred to Compliance Assessment if no agreement to pursue Problem Solving is reached and the Requesters would have expressly asked for this; or
  - the Case would be closed.

The Assessment stage has a standard duration of 40 business days from the date of the Request registration which might be extended to ensure robust processing or if translation of documents is required as per the PAP. The Assessment was initiated on 22 October 2024 and was completed in March 2025.

In line with the approach established in the PAP (see section 2.3), the IPAM team undertook the following activities during the Assessment stage:

- revision of relevant Project documents; and
- virtual meetings with the Bank team responsible for the Project, representatives of the Client, and the Requesters.

IPAM determined that for the purposes of the Assessment of this Case, it wasn't necessary to conduct a visit to the Project site in Kyrgyzstan and conducted a desk-based review of relevant Project documents and supporting documentation provided by the Requesters, Bank management and the Client.

## 3. Summary of the Parties' Views

This section provides the views of the Requesters, the Client, and Bank management as captured by IPAM during meetings and written communications. Prior to finalising this Report, to ensure that the information included herein is accurate, IPAM shared with Parties relevant sections and considered their comments when finalizing this Report.

## 3.1. Requesters

During the Registration and Assessment stages (June 2024 – February 2025) the IPAM team held two virtual meetings with the Requesters on 21 June 2024 and 20 November 2024. Requesters also participated in a Parties' virtual joint meeting facilitated by IPAM on 30 January 2025. Also, IPAM exchanged information and documentation via email with Requesters.

It is Requesters' consideration that the Project had to be classified as A not B as in their view the Shokpar WPP area passes through numerous migration routes of rare bird species from Northern and Eastern Kazakhstan, as well as China, Russia, and Mongolia. The Requesters also indicated that EBRD should have undertaken a thorough Environmental Impact Assessment as in their view the Project is likely to have a negative impact on biodiversity, in violation of the EBRD ESP, the International Convention on Migratory Species of Wild Animals, the Kunming-Montreal Global Framework for Biodiversity, and National legislation of the Republic of Kazakhstan (including the Environmental Code).

The Requesters also stated that they had conducted rapid bird monitoring, around the Shokpar wind farm, which had revealed facts of bird deaths apparently related to the wind turbines. They emphasised that the construction of the Shokpar wind farm affects the habitat of birds, mammals (including bats), and creates a threat of collisions of birds and bats with the blades of wind turbines.

In addition, Requesters indicated that overhead power lines used by the Project pose an additional risk of birds' electrocution and collision with wires. To mitigate the Project's impact on birds, the Requesters have proposed that the Client installs shutdown on demand systems on the wind turbines that slow down or stop the turbine when large birds or flocks of birds approach. In the view of Requesters this could significantly reduce the mortality of threatened species of birds present in the Red List.

In the Requesters' view, these omissions would not have occurred if a thorough study had been carried out and all technical solutions to mitigate these risks had been considered. As a secondary risk mitigation measure, in the Requesters' opinion, is to paint the wind turbines in black, as turbines would be more visible to passing birds.

In Requesters' view, the Project lacks serious biodiversity and environmental impact studies and the environmental permitting process hasn't followed a due diligence process, which they consider a reputational risk. The Requesters also noted that they have initiated proceedings before state authorities who issued the environmental permit for the Project.

Finally, the Requesters hoped that through the IPAM process they would achieve a favourable resolution to their concerns. They called on the Shokpar WPP and the EBRD to intensify communication efforts to address biodiversity impacts and to ensure that the Project complies with biodiversity protection and regulatory requirements for wind energy projects.

#### 3.2. Client

IPAM met virtually with representatives of the Shokpar Wind Power Station LLP on 4 December 2024 and exchanged information via email. The Client also participated in a Parties' virtual joint meeting facilitated by IPAM on 30 January 2025.

The Client explained that they conducted extensive environmental and bird monitoring studies before and during the Project operations, which did not identify significant risks to birds. They highlighted that a recent bird monitoring report conducted during bird migration periods has not recorded any significant incidents in the area where the Shokpar wind turbines are installed. They also explained that before selecting the location and layout for the wind turbines, they have undertaken the necessary assessments to minimize biodiversity impacts.

In addition, the Client expressed scepticism regarding the mitigation measures proposed by Requesters to reduce bird collisions with wind turbines, as in their view the Project is not causing serious harm to birds. They explained that bird detection systems haven't been installed on wind turbines as environmental studies conducted under the Project have not identified major risks to birds. Additionally, the Client raised financial considerations associated with bird detection devices, emphasizing that such costs would significantly impact the Project's viability.

The Client emphasized that the Project's categorization as B is aligned with EBRD guidelines and accurately reflects the Project's potential impacts and mitigation measures. It is their consideration that

the environmental assessments and measures already undertaken are sufficient and appropriate and reaffirmed their commitment to complying with EBRD requirements, local and international standards.

Finally, the Client shared that they welcome further engagement with the Requesters to discuss the data available to all Parties based on their monitoring activities and to provide additional explanation on their efforts towards biodiversity conservation.

#### 3.3. EBRD Management

IPAM held an online meeting with representatives of Bank management on 22 November 2024 and communicated via email regarding the Request submitted to IPAM. Bank management submitted a written response to the Request on 10 January 2025 and participated in a Parties' virtual joint meeting facilitated by IPAM on 30 January 2025. The summary below is based on Bank management written response as well as the information gathered by IPAM during meetings.

Bank Management explained that independent environmental and social due diligence was undertaken at the Project concept review stage. The review identified that potential adverse environmental and social impacts are site-specific and can be readily identified through due diligence and addressed through mitigation measures. Bank management asserted that the Project's current categorization as B and mitigation strategies are consistent with EBRD guidelines and international standards.

Bank management also indicated that Appendix 2 of ESP 2019 states that "large-scale wind power installations for energy production (wind farms)" would be classed as category A. It is the consideration of Bank management that the definition of large-scale has changed over time, and they consider 0.5-3 GW projects as large, whilst <200 MWe are no longer seen as large. Hence, they explained that what was a large wind farm 10 years ago, today is seen as small to medium, e.g. 100 MW wind farm 10 year ago would require 50 turbines - now this could be 15 turbines. Furthermore, in their view renewables are no longer a novelty investment that requires stakeholder awareness and explanations on what a wind farm is.

Bank management further explained that they appraise each project on a case-by-case basis looking into the sensitivity of each site and comparing it against Appendix 2 of the ESP (EBRD E&E Exclusion List). They also explained that during the due diligence process they engaged with local and international CSOs including in Kazakhstan, to seek help with site selection and to avoid conflicts. They further stated that the scope of the biodiversity and social assessments on renewable projects is similar regardless of categorisation and is based on a risk assessment.

Bank management added that the proposed project site is not located in any recognized important bird areas, which was confirmed by an independent consultant during the Project due diligence process. They explained that birds' main migratory pathways were found, but within about 25-30 km north of the Project area. They added that the area's ecological value is relatively low with the vegetation and animals typical for the waterless zones of the steppe.

Bank management stated that the environmental and social due diligence under the Project included detailed review of the potential impacts on avifauna and need for mitigation measures based on a bird collision risk assessment, undertaken in consultations with international bird experts. Biodiversity baseline surveys were conducted within the 1500 ha site allocated for the Project and within a 2km buffer around the site for some ornithology receptors and included information on all species present at the site, including red lists species. Further habitat survey of the Shokpar WPP using the relevant EUNIS classifications will be undertaken including Critical Habitat Assessment.

Regarding Requesters' suggestion to install bird detection systems on wind turbines, Bank management explained that the independent international consultants outlined key risks and mitigation measures that were reflected in the environmental and social action plan, including but not limited to development of biodiversity management and monitoring plans. The consultants confirmed the

suitability of the site and did not make any recommendations for shutdown on demand using automatic systems. It is the consideration of Bank management that the use of shutdown systems is expensive and is being used only in highly sensitive areas. As to Requesters' suggestion to paint in black the wind turbines they expressed that this is not considered as an effective measure to protect birds from collision with wind turbines.

Bank Management expressed confidence that the Project complies with all EBRD requirements and international standards and highlighted their commitment to implementing agreed-upon measures to ensure that potential environmental impacts are appropriately managed and addressed. The Bank believes that the Project has been structured to comply with the ESP's PR6 and good international practice and will be monitoring the implementation of the Project.

Finally, Bank management explained that they welcome further engagement with the Requesters to discuss the data available to the Client based on their monitoring program and to provide additional explanation on the efforts made by the Client on biodiversity conservation.

#### 4. Assessment Determination

Based on the Assessment activities undertaken in relation to <u>Case 2024/05 KAZREF II – Shokpar Wind</u>, made the following determinations:

- As required by the PAP, IPAM confirms that, after an in-depth analysis of the concerns raised, the Request meets the Registration criteria set in the PAP and the case should continue its processing.
- Based on the outcomes of the virtual joint meeting of Parties that IPAM facilitated on 30 January 2025, Parties have expressed interest in continuing their engagement to work together towards resolving the concerns raised with IPAM. The Client and Bank management committed to review the data shared by Requesters regarding Project impacts on birds and proposed to convene in a next joint meeting to discuss potential mitigation measures.
- The Case will proceed to Problem Solving, as all relevant Parties (Requesters, Client, and Bank management) have expressed their willingness to engage in IPAM's Problem Solving function. Given these findings, this Report includes preliminary Terms of Reference for Problem Solving whereby the proposed scope, methods to be used, the timeframe and the type of expertise required are presented.

### 5. Conclusion and Next Steps

Based on the activities undertaken during the Assessment stage, IPAM determined that Case will proceed to Problem Solving, as all relevant Parties (Requester, Client, and Bank management) have expressed their willingness to engage in IPAM's Problem Solving function. Given these findings, this Report includes preliminary Terms of Reference for Problem Solving whereby the proposed scope, methods to be used, the timeframe and the type of expertise required are presented.

IPAM wishes to thank the Requester, the Client, the Contractor and Bank management for their time and inputs provided during the Assessment stage. This Assessment Report is circulated to the Parties and disclosed in the virtual case file for <u>Case 2024/05</u>, in English after its submission to the Board and the President for information. After that, the Case will be transferred to the Problem Solving stage.

# Annex 1. Terms of Reference for Problem Solving

### I. About the IPAM Problem Solving Process

The Project Accountability Policy in section 2.4 establishes general guidance to be observed in IPAMfacilitated Problem Solving initiatives in general:

#### **Guiding Principles for Problem Solving**

The Problem Solving initiatives led by IPAM are based on the following guiding principles:

**Co-design:** the design of Problem Solving processes should be based on the methods, format and preferences of the Parties.

**Good Faith**: the success of Problem Solving processes requires that all Parties are willing to participate in good faith, effectively seeking to find mutually agreeable solutions.

**Rules-based:** Problem Solving processes require that the Parties define from the start the ground rules that will guide the process and that they commit to abiding by them.

Voluntary Nature: The Parties have the right to enter, as well as withdraw from a Problem Solving process.

### II. Objective

The objective of the Problem Solving is to:

- Facilitate the dialogue between the Requesters and the Client (together as Parties) to ensure common understanding and support them find solutions to the concerns raised.
- Formalize the agreements reached and accompany the implementation of these agreements until fully executed.

For the Problem Solving, these Terms of Reference apply to all actions undertaken as part of the EBRD financed components of the <u>KAZREF II - Shokpar Wind (52946)</u>. Activities carried out under this Problem-Solving Terms of Reference may be subject to modification, provided that the IPAM Head expressly agrees to the change(s), and so long as such changes do not prejudice the interests of any Party.

#### III. Approach

IPAM serves as a third-party impartial facilitator that provides guidance and seeks to promote trust building between the Parties and ensure that the engagement is equitable and accessible.

To achieve the objective of finding mutually acceptable resolution to the issues presented in the Request, IPAM will:

- take into account all circumstances of the Case (including the nature of the issues raised, their urgency, and the reasonable likelihood of success), with a view to identifying the most appropriate approach to Problem Solving. Approaches will be chosen in consultation with the Parties, and may include information gathering and sharing, shuttled diplomacy, joint factfinding or supported negotiation;
- ii. engage an external consultant to support and facilitate the dialogue process in accordance with the Procurement Rules and Paragraph 3.1 i) of PAP, if deemed necessary by IPAM; and
- iii. not support agreements that would be contrary to EBRD policies or in breach of any applicable law.

### IV. Termination.

The Problem Solving process may be terminated at any time:

- by IPAM, if in IPAM's view, following consultation with the Parties, the Problem Solving is no longer likely to lead to a positive outcome, and/or if the Problem-Solving process has ceased to constitute an efficient use of resources, in which case IPAM will notify all Parties in writing; or
- by any Party, Problem Solving is a voluntary process, and Requesters and Clients may withdraw from it at any time.

#### V. Scope of the initiative

The scope of the initiative is limited to the issues raised in the <u>Request</u> in relation to the EBRD Project <u>KAZREF II - Shokpar Wind (52946)</u> and further elaborated in the Assessment Report. In particular, the Parties have expressed preliminarily their agreement that IPAM would serve as a third-party independent facilitator to assist them in identifying solutions to the concerns raised, reach Agreement, and assist during the period of implementation of the proposed solutions. In addition, IPAM's role would be to facilitate the flow of information and ensure common understanding to ensure a successful outcome.

#### VI. Proposed Methodology

As per the Assessment findings, and subject to confirmation as the initiative advances, the methods utilised in this Case would include:

- Information gathering and sharing in culturally appropriate formats;
- Fact finding on the issues raised in the Request;
- Shuttled diplomacy;
- Facilitated bilateral and joint discussions with Parties; and
- Supported negotiation.
- VII. Resources Required

#### Independent External Facilitator

In line with the provisions of the 2019 PAP, the Problem-Solving process will be led by IPAM's Problem Solving Lead with the possibility of identifying a local external facilitator to assist the Parties in their engagement. The intensity of the engagement will be dependent on the position of the Parties regarding the concerns raised and potential mitigation measures.

The facilitator will engage with Parties as a neutral 'third party', in an independent and impartial manner and should have no conflicting interests in relation with the Project or any of the Parties involved in Problem Solving. It is not the role of the facilitator to decide whether Parties' actions, opinions or perceptions are right or wrong or to arbitrate in favour of one of the Parties.

#### Interpretation and translation

Interpretation and translation services will be required during the initiative to facilitate IPAM's communication with local Parties.

#### Site Visits

Site visits by the external facilitator and the IPAM team will be required during the process. Any travel will require prior approval by the IPAM Head.

#### VIII. Problem Solving Timeframe

A preliminary schedule of the main milestones and deliverables is presented below and may vary depending on the availability of Parties and other external factors beyond the control of IPAM.

# Proposed Milestones and timeline

Activity	Estimated timeline
The Client and Bank management to commission an international consultant who would help them review the impacts on birds presented by Requesters.	April 2025
Parties to convene in a joint meeting facilitated by IPAM to discuss potential mitigation measures. Based on this, discussion, and agreement on next steps.	May 2025