Non-Technical Summary (NTS)

[REDACTED]

Wind farm Notus Wind

[REDACTED]

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1. INTRODUCTION

1.1 GOALS AND OBJECTIVES

Renewable energy development in Ukraine is important to provide alternative energy solutions to decrease reliance on fossil fuels and imported energy.

The Ukrainian government has developed an Energy Strategy for 2050[1] aiming at moving towards sustainable development of the national economy by ensuring access to reliable, sustainable and modern energy sources.

The ongoing war has severely worsened the energy supply crisis in Ukraine, contributing to significant socio-economic challenges. The destruction of traditional thermal power plants has left large portions of the population without reliable electricity. Furthermore, the lack of control over the Zaporizhzhia Nuclear Power Plant, one of the largest in Europe, has exacerbated the energy deficit and underscored the risks of relying on centralized and vulnerable power sources. If the proposed wind farm is not constructed, the opportunity to address these critical issues through decentralized and sustainable energy generation will be lost, further deepening the energy crisis. According to Ukrenergo, wind farms generating capacity in 2024 was 0.6GW, but, due to indicated interest of investors, the targeted energy generation is 5GW.

Building more alternative energy power stations in Ukraine is critical for ensuring the country's energy security and resilience. Investing in renewable energy infrastructure, such as wind farms, not only diversifies the energy mix but also enables decentralized energy production, reducing the risk of large-scale disruptions. Moreover, these sustainable solutions align with global efforts to combat climate change and position Ukraine as a forward-thinking energy leader in the region. At the same time, the socio-economic benefits of the wind farm are generally broader in scale. Overall stabilization of electricity generation and supply will reduce the risks of frequency fluctuations and power outages.

[REDACTED]

Project introduction

[REDACTED] (Company) is the Special Purpose Vehicle (SPV) created for the WF Notus Wind Project . Company is registered as a limited liability company in Ukraine and owns and will operate the electricity generation assets of the Project in Ukraine. This entity will own all required project rights and become counterparty in the main project contracts.

NOTUS is a leading German wind farm developer that was founded in 2001. Since 2001 the company has acquired in-house expertise to develop, construct and operate wind farms worldwide. NOTUS headquarters are in Potsdam near Berlin, Germany. 465 dedicated wind farm development professionals provide experience and competence in all relevant disciplines, based in the companies headquarter in Potsdam as well as other cities in Germany, Europe, and Latin America.

This Non-Technical Summary (NTS) provides a summary of the Project's Environmental and Social Impact Assessment (ESIA).

[1] https://www.mev.gov.ua/reforma/enerhetychna-stratehiya-0

2. PROJECT DESCRIPTION

2.1 SITE DESCRIPTION

[REDACTED] The Project consists of 21 wind turbine generators (WTG), in additional one WTG is considered as an optional, the rated power of WTGs is 5.9 MW rotor diameter is 163 m. In addition, the construction encompasses internal roads and access off-site road, cable networks, 110 kV overhead power transmission line with a length of 8 km, 110/35 kV substation.

Based on the Project's characteristics, it qualifies as a 'Category B' Project under the Environmental and Social (E&S) policies of IFC and EBRD.

'Category B' projects are associated with potential limited adverse environmental and social risks and impacts that are generally site-specific, mostly reversible, and can be readily addressed through mitigation measures. This Environmental and Social Impact Assessment (ESIA) provides an overview of the identification and assessment of expected environmental and social impacts of the Project and its associated infrastructure, ensuring alignment with Equator Principles IV (2020)[2], EBRD Performance Requirements (PRs) (2019)[3] outlined in the EBRD Environmental and Social Policy, and the IFC Performance Standards (PS) (2012)[4]. Key applicable guidelines include the IFC Environmental, Health, and Safety (EHS) Guidelines for Wind Energy (2015)[5], the IFC EHS Guidelines for Electric Power Transmission and Distribution (2007)[6], and the World Bank General EHS Guidelines (2007)[7].

The outcomes of the ESIA, including the proposed mitigation measures and monitoring strategies, are summarised in the standalone Environmental and Social Management Plan (ESMP) for the Project. The ESMP integrates the mitigation and monitoring requirements identified in the ESIA, offering a comprehensive overview of the Project's future environmental and social commitments. Mitigation measures and monitoring strategies are described in detail in separate documents (ESMP) that presents procedures to be applied by the Company, Developer and contractors throughout the Project implementation.

2.2 PROJECT COMPONENTS

Summary of Key Components

The proposal for the construction, operation and decommissioning of the Project comprises the following elements:

- Wind turbines. 22 potential WTG locations of which 21 will be used assuming 5.9 MW per turbine. The total wind farm capacity is expected to be 123.9 MW.
- Internal roads 25.25 km, intended for transportation of equipment and movement of construction machinery and mechanisms during the construction period.

[2] The Equator Principles_EP4_July2020
[3] Environmental and Social Policy 2019
[4] Performance Standards on Environmental and Social Sustainability | International Finance Corporation (IFC)
[5] Environmental, Health and Safety Guidelines for Wind Energy
[6] Final - Electric Power Transmission & Distribution.doc
[7] World Bank Document

- Underground cables. The turbines will be connected to a power distribution point (substation) via underground medium voltage cables (35 kV) and fibre-optic control and communication cables with a total length of approximately 45 km.
- Substation [REDACTED] 110/35 kV is intended for temporary accumulation of generated electric capacity and increase of the voltage class of the generated electrical energy to 110 kV.
- OHL (110kV). A total of 48 OHL poles with a length of 8 km is expected to be installed for the transportation of the generated electricity to the [REDACTED] substation (330/110/10 kV) from where electricity is transmitted to the unified energy system of Ukraine.

2.3 PROJECT PHASES

Preparatory and construction phase

During the preparatory phase, the following activities are planned:

- Preparation of the detailed design
- Preparation of the territory of the Project
- Foundation construction
- Installation of the wind turbines
- Construction of power lines, cable laying, transformer station [REDACTED] (35/110 kV), and connection to the power grid via the [REDACTED] substation (110 kV).
- Soil reclamation

Operation phase

To organize the control and management of the wind farm, the project envisages the construction of a dispatcher point at the [REDACTED] SS. The building will be equipped with working and emergency lighting, ventilation, heating and air conditioning. The heating system will be provided with electric heaters. It is planned the personnel will not be permanently present on the territory of the WPP site.

Decommissioning phase

The estimated service life of the wind farm is at least 30 years. After this period, two options exist: continued use of the site with replacement of existing WTGs with modern ones at that time or decommissioning of the wind farm, dismantling of WTGs and other major structures, and restoration of the area.

3. ENVIRONMENTAL & SOCIAL BASELINE CONDITIONS

3.1 LANDSCAPE AND VISUAL

Visual impacts from wind energy projects are typically associated with the turbines themselves—such as their colour, height, and number—as well as how these elements interact with the surrounding landscape and any visual receptors in the area. Due to their height, turbines are often visible from several kilometres away and introduce a noticeable change to the local landscape.

However, the extent of visual impact varies depending on factors like distance, turbine size, visibility conditions, landscape features, and the presence of sensitive visual receptors.

Given the relatively flat topography of the area, all viewpoints selected (VPs were intended to provide a representative cross section of potential visibility and impact of the Project throughout the study area) will experience moderate adverse impacts. Mitigation options are fairly limited during operation and would therefore be focused on the full implementation of a community benefits strategy to ensure that any visual impacts on the local population is offset by an appropriate level of community benefit.

3.2 A comprehensive assessment of landscape character and visual amenity has been undertaken as part of the Project's environmental and social impact assessment, including analysis of baseline landscape character, visual sensitivity of receptors, zone of theoretical visibility, and representative viewpoints. On the basis of this assessment, and taking into account the scale of the Project and the existing landscape context, visual impacts are not considered to represent a significant concern for the Project.TERRESTRIAL ECOLOGY

Flora

To determine the impacts, monitoring studies of vegetation within the wind farm site, the traditional geobotanical methods and an optimal set of parameters (indicators) to characterize the state of flora and vegetation were used.

The specificity of the project area is that it is completely occupied by altered habitats - agrocenoses with ruderal vegetation, secondary meadows and tree-shrub vegetation (protective shelter belts). In this case, the main focus of monitoring studies of plant cover within the wind farm site was focused on identifying places where quarantine and invasive species grow, as well as on protected shelter belts, which play an important biotope function in the region. Another important component of monitoring within the wind farm site was the identification of dry grass patches (especially in summer) that may also pose a fire hazard. Habitats of botanical important do not exist.

No areas with critical habitats within the project site and the +2.0 km buffer zone were identified. No plants protected by the Green Book and Red Book of Ukraine were identified within the project area.

Fauna

Rodents

Special attention during the study was paid to the detection of the Lesser blind mole-rat (Nannospalax leucodon) and the Common or European Hamster (Cricetus cricetus), since these species have significant conservation value (European Hamster - IUCN Vulneareble) and are important indicators of the state of local ecosystems in the region.

Mammals

A lot of tracks of foxes (Vulpes vulpes L.) and grey hare (Lepus europaeus L.) were vastly observed, as well as their actual presence in the project area. Indistinct tracks, tentatively attributed to badger (Meles meles L.), were also recorded. Within the buffer zone of "Dalnytskyi Forest" botanical reserve, the traces of a fox, a grey hare, and a wild boar were also identified. The presence of wild boar may be caused by availability of european oak and red oak in the reserve.

Insects

No rare insect species listed in the Red Book of Ukraine (2009)[8] and international protected lists were detected. The insect species composition is represented by typical species tolerant to excessive anthropogenic loads, widely distributed in the south of Ukraine. Most of them have adapted to existence in an anthropogenically modified area.

Amphibians and reptiles

Only two species of reptiles inhabit the boundaries of the projected wind farm: the pond lizard (Lacerta agilis), being the majority of population, and the large whipsnake (Dolichophis caspius), which was observed less frequently and predominantly near residential areas. Their population in agricultural lands is very low and can be mainly localized in the adjacent steppes and the coast of the [REDACTED] estuary. They are also significantly affected by anthropogenic load due to livestock grazing, recreational activities, etc. In total, one species of amphibians and two species of reptiles were identified within the project area.

Bats

The location for wind farm construction was assessed as acceptable, since the places of concentration of chiropteran fauna are remote from the places of installation of wind power plants and infrastructure. According to the results of the inspection of the areas of the already operating wind farms in the region, no dead bats, body parts or other evidence of a collision were found.

Birds

Based on survey data from all seasons in 2024 (approximately 358.5 hours of VP surveys over the entire wind farm area), it was noted that the vast majority of birds have a range of up to 35 metres in the area. Exceptions were flocks of White-fronted Geese, which had a range of altitude exceeding the maximum height of the wind turbine or potentially dangerous altitude, but moved outside the proposed wind farm, usually over the [REDACTED] and the [REDACTED] National Nature Park. Red Book Cranes Grey Cranes (Grus grus) were not recorded at all within the wind farm and buffer zones.

[8] Червона книга України. Головна

3.3 HYDROLOGY AND HYDROGEOLOGY

[REDACTED] According to hydrological zoning, the [REDACTED] probability of flooding is very low.

3.4 GEOLOGY AND SOILS

The Project site is predominately of flat terrain, rising eastwards with an average elevation of 35 m. Geomorphologically, according to the Geological Map of Ukraine, the Project area is located within the Meotychny Regional Stage, characterized by limestones, sands, sandstones and clays.

According to the seismic zoning map of Ukraine, the seismicity of the project area is 7 points. According to Table 5.1 of State Construction Norms (DBN) V.1.1-12-2014 the project belongs to:

- category of soils by seismic properties — II (second);
- speed of propagation of seismic waves in the soil — 500 m/s < Vs < 800 m/s.

The design solutions of the Project were designed taking into account the requirements of DBN V.1.1-12.2014 "Construction in seismic areas of Ukraine".

3.5 ARCHAEOLOGY AND CULTURAL HERITAGE

According to the archaeology assessment carried out by the Archaeology Department of [REDACTED] of the Institute of Archaeology of the National Academy of Sciences of Ukraine in 2011-2012. Archaeology assessment during this period identified four cultural heritage sites within the Project area. The sites are on the safe distance from Wind Farm construction area:

3.6 TRANSPORTATION AND ACCESS

For all route options, the roads leading to the Project site are in moderate condition. Some repairs / upgrades are likely to be required prior to deliveries commencing, particularly the abnormal load vehicles. Traffic volumes are typically moderate and consist of a mix of cars, LGVs and HGVs. There are generally low pedestrian levels on these roads however, in Spring and Summer, market traders and local villagers are present along the sides of the roads selling produce (fruit, vegetables, milk, wine etc.).

3.7 AVIATION, RADAR AND TELECOMMUNICATIONS

The State Aviation Administration of Ukraine conducted an assessment to determine whether the planned wind power plant would interfere with air traffic. As a conclusion the Project received a positive conclusion on the maximum height of objects in the airfield area from the State Aviation Service of Ukraine.

3.8 COMMUNITY HEALTH, SAFETY, AND SECURITY

During construction and operation phase the main impacts on community health, safety and security include the noise, shadow flicker, trespassing by unauthorized personnel, and potential occurrence of incidences between site personnel and communities. In addition, risks to the health and safety of the Project workforce have been identified, including exposure to construction hazards, traffic risks, fire hazards, extreme weather conditions, and emergency situations. These potential impacts are outlined below and are accompanied by appropriate

mitigation and monitoring measures in summary form, with full details provided in the ESIA and the Environmental and Social Management Plan (ESMP).

In accordance with the ESMP, protection of the Project workforce will be ensured through the implementation of occupational health and safety measures, including controlled site access, induction and regular safety training, provision and enforcement of personal protective equipment, fire prevention and response measures, availability of emergency response equipment, and clearly defined emergency response and evacuation procedures. Temporary shelters, designated safe rest areas, first-aid facilities, and access to emergency medical support will be provided as required, in line with the Health and Safety Management Plan and Emergency Response and Crisis Management Plan. These measures will also contribute indirectly to community safety by reducing the likelihood of accidents, uncontrolled incidents, and interactions between workers and the surrounding communities.

4. POLICY FRAMEWORK

The Project has been developed in accordance with Ukrainian national laws, norms and regulations. The Project is also aligned with internationally recognized environmental and social standards and requirements, namely:

- European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy, that indicates Environmental and Social Performance Requirements (EBRD PR, 2019)[9]
- International Finance Corporation's Performance Standards (IFC PS, 2012)[10], including the World Bank Group's Environmental, Health, and Safety Guidelines for Wind Energy[11]
- European Union (EU) Law and Regulations applicable to the Project, including the EU Environmental Impact Assessment Directive[12] and the EU Directives on the conservation of natural habitats and of wild fauna and flora[13]

[9] Environmental and Social Policy 2019

[10] Performance Standards on Environmental and Social Sustainability | International Finance Corporation (IFC)

[11] Environmental, Health and Safety Guidelines for Wind Energy

[12] Environmental Impact Assessment - European Commission

[13] eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043

5. ENVIRONMENTAL AND SOCIAL IMPACTS

Table 5-1 provides a summary of impacts during construction and operation in the absence of mitigation. Note that the table below is not an exhaustive list of all impacts and mitigation measures.

Table 5-1. Summary of Impacts and Mitigation

Environmental Receptor	Predicted impact	Mitigation / Enhancement
Visual amenity	Moderate impacts are predicted due to noticeable change in the existing view for all remaining viewpoints identified.	Full implementation of the community benefits strategy to ensure that visual impacts on the local population is offset by an appropriate level of community benefit.
Air Quality	During construction, minor short-term impacts related to dust generation and exhaust emissions from construction plant and vehicles may occur within the construction footprint and along transport routes. No significant air quality impacts are expected during operation.	Implementation of dust suppression measures (e.g. watering of unpaved roads and working areas), good maintenance of construction equipment, and compliance with Construction Management Plan.
Landscape character types	The impact on all LCTs are predicted from low to negligible.	Limiting damage to any grassland or agricultural land by keeping the construction areas and roads to a minimum and maintaining strict requirements for vehicles to remain on the roads at all times. Reinstating grassland / agricultural land where construction areas and roads are no longer required. This would reduce the duration of the visual impact.
Protected territories	The significance of impact may be assessed as low at each stage of project implementation.	The operation of the wind farm should be carried out in accordance with the requirements of environmental protection, ecological, sanitary and hygienic safety at all stages of operation with the respect of established protection zones. If applied, the planned activity will not lead to a deterioration in the condition of protected territories.
Flora	The potential impact is mainly expected from disturbance and removal of the soil-vegetation layer. Research during 2024 showed that no dangerous factors were found that would affect the state of flora. As	Perform activities in line with Biodiversity Management Plan. In line with EIA conclusion.

Environmental Receptor	Predicted impact	Mitigation / Enhancement
	flora is regarded as a renewable natural resource, this impact was assessed as low.	
Fauna: European Hamster and Lesser Mole-rat	No traces of the presence of this species were observed during research of 2024. The impact is assessed as low.	Carry out inspections and regular checks to ensure that no fauna species have entered the construction site. In case of such occurrence, removal of animals that have entered the trenches and relocation of them to a remote, safe location appropriate for the specific species should be performed.
Bats	Concentration of chiropteran fauna is remote from the places of installation of wind power plants and infrastructure. The impact is assessed as low.	The low predicted risk, and in line with EBRD Performance Requirement 6 and good international industry practice, bat monitoring will be implemented during the construction and operational phases of the Project. The purpose of this monitoring is to confirm the accuracy of the impact assessment, verify the effectiveness of design and mitigation measures, and enable adaptive management should unforeseen impacts be identified. Bat monitoring surveys will be carried out in accordance with the EIA and the Biodiversity Management Plan.
Ornithology	Based on the results of the analysis of monitoring indicators and behavioral elements, most birds of the wetland group, whose habitat is limited to the water area and coastal zone, are not affected by the wind farm, while other species - inhabitants of the land and forest-shrub group - are very low. Based on this assessment, there is no need to minimize impacts on this group of birds due to the low significance of potential impacts. The collision risk is assessed as low to medium.	Due to the migratory nature of several bird species recorded in the Project area, the level of impact may vary between years. Based on the results of the baseline surveys and the assessment undertaken, the Project is not expected to result in significant impacts on avian species at this stage. Nevertheless, in accordance with EBRD and IFC good international industry practice, further monitoring is required to verify these conclusions. Accordingly, operational monitoring of avifauna will be carried out during construction and for a minimum period of three years following commissioning of the wind farm, including vantage point (VP) surveys to assess bird flight activity, behaviour, and avoidance responses. In line with the EIA / OVD conclusions, avifauna monitoring will be supported by the use of specialised monitoring equipment, such as optical observation equipment (e.g. binoculars and spotting scopes) and, where appropriate,

Environmental Receptor	Predicted impact	Mitigation / Enhancement
		automated or semi-automated monitoring tools, to improve detection and recording accuracy (during five years of operation). In addition, post-construction fatality monitoring (PCFM) will be implemented in line with EBRD and IFC guidance to identify and quantify any bird mortality associated with the operation of the wind farm. The PCFM programme will include systematic carcass searches, application of appropriate correction factors (including scavenger removal and searcher efficiency trials), and annual reporting of results. This approach is consistent with the conclusions of the EIA and the requirements of EBRD Performance Requirement 6 and relevant IFC guidance.
Hydrology & Hydrogeology	Erosion of drainage channels as a result of the construction process.	Routes should be selected to avoid ephemeral drainage channels. Culverts or other drainage control features should be installed where crossings of drainage routes are unavoidable.
Hydrology / groundwater	Potential leakage of oil and lubricants from the machinery and equipment used during construction may cause minor to moderate impacts on soil and groundwater contamination.	Good maintenance of all materials In line with construction Management Plans
Soils & Geology	Increased vulnerability to erosion during construction leading to moderate impacts.	Good maintenance of all materials In line with construction Management Plans
Archaeology & Cultural Heritage	Potential for damage to previously undiscovered archaeology during construction leading to moderate impacts given existing presence of archaeological features in the area.	Implementation of a Chance Find Procedure in line with national legislation and the requirements of EBRD PR8 and IFC PS8. Construction personnel will be trained in chance find procedures, and works will be halted and competent authorities notified if any previously unknown cultural heritage is discovered.

Environmental Receptor	Predicted impact	Mitigation / Enhancement
Noise	During the preparatory period and construction of the WPP, construction and installation works may be accompanied by increased noise impact on the environment. Acoustic calculations for the construction phase show that the expected noise levels during construction will not exceed regulatory standards. The assessment is conducted for a distance of 800 meters in the direction of the nearest settlement. A detailed breakdown of methodology used in order to calculate potential noise levels can be found in EIA of this Project. During the operation of the wind power plant, noise pollution will be generated directly from the operation of the wind farm. The results of calculations of the probable noise level at the boundary of residential areas indicate that maximum sound levels in the nearest residential area will not exceed permissible values.	The Contractor will prepare and implement a detailed Noise Management Plan (NMP) for the construction phase, which will include a clear construction schedule, identification of equipment to be used, working hours, and site-specific noise control measures. Noise impacts during the operational phase have also been assessed as part of the environmental impact assessment. Operational noise levels from the wind turbines were modelled using industry-standard wind farm noise modelling software (WindPRO), taking into account turbine specifications, layout, terrain, meteorological conditions, and the location of nearby noise-sensitive receptors. The modelling results demonstrate that predicted operational noise levels at the nearest residential receptors comply with applicable Ukrainian standards and IFC guideline values. The Noise Management Plan will apply to both the construction and operational phases of the Project. During operation, the Plan will include procedures for monitoring and managing community grievances related to noise, including the maintenance of a grievance register and defined response timelines. Where substantiated noise complaints are received, site-specific noise measurements will be undertaken at relevant receptor locations to verify compliance with applicable limits. Should monitoring indicate that noise levels exceed permissible standards, additional mitigation measures will be identified and implemented as necessary. To reduce noise levels from the operational wind farm, the planned WTG design includes the following measures: • Installation of components and motors on noise- and vibration-damping pads. • Optimized blade design and serrations to reduce aerodynamic noise.

Environmental Receptor	Predicted impact	Mitigation / Enhancement
Shadow Flicker	Approximately 21 sensitive receptors are expected to experience shadow flicker beyond recommended limits, caused by WTGs 6, 7, 26, 27, 28, 30, 32, and 39. As the wind farm is located on agricultural land without permanent settlements or planned expansions, shadow flicker will not inconvenience the local population.	In order to ensure impacts are reduced to below the IFC limit indicated in IFC Wind Farm EHS Guidelines, WTGs which are identified as causing shadow flicker impacts shall be fitted with a shadow flicker module. This mitigation would be required for WTGs 6, 7, 26, 27, 28, 30, 32 and 39.
Traffic and Transport	Overall minor to moderate impacts on road network and users in relation to accidents and safety, severance, driver delay, pedestrian amenity and pedestrian delay. The increase in community health and safety risks from road traffic is a major negative impact. Negligible impacts on the road network and its users during operation.	Once the proposed transport route option is selected, the Contractor will undertake a detailed route survey, including swept-path analysis for all Project vehicles and oversized components. In addition, pre-construction baseline condition surveys of all public and local roads to be used by the Project will be carried out by the Contractor, in coordination with the relevant road authorities, to document existing conditions, manage potential claims, and enable monitoring of Project-related impacts. A comprehensive Transport Management Plan (TMP) will be developed and implemented for the construction phase of the Project. The TMP will include traffic management measures, scheduling of deliveries, safety controls, and emergency procedures. A specific transportation plan for extra-long and oversized WTG components (including blades and tower sections) will be prepared and agreed in advance with the relevant transport and traffic authorities, and all required permits and approvals will be obtained prior to transportation. Relevant authorities will be informed in advance of transportation schedules, and formal approvals will be secured for the movement of oversized loads. Prior to the commencement of construction, local residents and businesses will be informed of planned transport activities and any likely disruptions through leaflets, public notices, and local communication channels, including community Telegram groups.

Environmental Receptor	Predicted impact	Mitigation / Enhancement
Land Use Changes	The negative impact significance is minor as farmers will experience a slight reduction in the total area of land that they currently have access to for agricultural production. Overall, negative impacts to land will be reduced to negligible.	Land acquisition for the Project has been undertaken through voluntary lease agreements concluded directly with private landowners and legal land users, in accordance with the requirements of EBRD Performance Requirement 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) and IFC Performance Standard 5. No expropriation, compulsory acquisition, or involuntary resettlement has been applied for the Project. All affected plots are privately owned or legally leased, and no informal landowners, informal land users, or users without legal tenure were identified within the Project area. The Project requires both permanent and temporary land use. Permanent land use includes land leased for WTG foundations, internal access roads, the substation, and overhead transmission lines. Temporary land use includes areas required for construction activities such as installation of underground cables, temporary widening of access roads, and short-term laydown or material storage areas. All lease agreements have been concluded on a willing-buyer–willing-seller basis, with lease payments set at market-based rates consistent with prevailing local land values and agricultural income. Lease conditions, compensation levels, and land-use restrictions were clearly explained to landowners in advance, and agreements were signed without coercion or undue influence. The area of land leased from each individual landowner represents only a small proportion of their total landholding and does not result in fragmentation or creation of orphan land where remaining plots would no longer be commercially viable to cultivate or use. For plots requiring temporary land use, Notus has committed to providing fair compensation for any crop damage, loss of income, or temporary disruption to farming activities. Compensation is calculated based on market prices and declared yields, and land will be reinstated to its original condition following completion of works, where applicable. As a result, no physical displacement, economic displacement, or loss of livelihood is anticipated, and livelihood restoration measures are not required under PR5 / PS5.

Environmental Receptor	Predicted impact	Mitigation / Enhancement
		The Project's grievance mechanism remains available to all landowners and land users to raise concerns related to land access, lease terms, land-use restrictions, compensation levels, or any other Project-related issue. Grievances can be submitted directly to the Notus and will be addressed in accordance with the established grievance procedure. On this basis, land acquisition and land-use arrangements for the Project are considered to be fully compliant with EBRD PR5 and IFC PS5, and no residual land acquisition or livelihood impacts are expected.
Use of security personnel	During construction, the impact is moderate as the presence and behavior of security staff may result in a rise in local tensions if they behave in an inappropriate manner. The residual impact significance is expected to be negligible after the mitigation and monitoring measures have been implemented.	Development of Security Management Plan.
Health & Safety involving the workforce & local communities	The use of a workforce and construction activities generates a variety of occupational health and safety risks to the workforce and to local people leading to the potential for moderate impacts.	The Project will implement a comprehensive set of measures to prevent and mitigate health, safety and security risks for both the workforce and local communities, in accordance with the Environmental and Social Management Plan and the requirements of EBRD Performance Requirements 2 and 4. A Health and Safety Management Plan will be developed and implemented to manage occupational health and safety risks for all Project workers. This Plan will include hazard identification, risk assessments, site access control, induction and refresher training, use of personal protective equipment, toolbox talks, incident reporting, and regular site inspections. A Community Health and Safety Plan will be implemented to prevent and manage risks to local communities arising from construction and operational activities. Measures will

Environmental Receptor	Predicted impact	Mitigation / Enhancement
		include traffic safety controls, segregation of construction areas from public access, clear signage and fencing, management of construction working hours, communication of construction schedules to communities, and procedures to prevent unauthorised access to the site. An Emergency Response and Crisis Management Plan will be developed covering both worker and community-related emergencies, including war related, fire, medical emergencies, extreme weather events, traffic incidents, and security-related incidents. The Plan will define roles and responsibilities, communication and notification procedures, coordination with local emergency services, and regular drills and training. The construction workforce is expected to consist primarily of skilled and semi-skilled workers recruited from the local and regional labour market, supplemented by a limited number of specialised personnel from outside the region where required. Workers will be accommodated either in existing local accommodation facilities (such as hotels or rented housing). No temporary or permanent worker camps are planned. All worker accommodation will be subject to clear accommodation rules, regular inspections, and management oversight to ensure acceptable living conditions and to minimise potential disturbances to surrounding communities. The EPC contractor will be responsible for monitoring worker conduct both on-site and in accommodation facilities. Worker behaviour will be managed through the implementation of a Code of Conduct, which will apply to all Project personnel and subcontractors. The Code of Conduct will address respectful behaviour towards local communities, prohibition of harassment, violence, and discrimination, rules on alcohol and substance use, and compliance with local laws and customs. All workers will receive mandatory training on the Code of Conduct and community interaction prior to commencing work and through regular refresher sessions. Mobile shelters and designated rest areas will be provided on construction sites to protect workers from adverse weather conditions and ensure safe working practices.

Environmental Receptor	Predicted impact	Mitigation / Enhancement
		The Construction Management Plan will integrate all health, safety, security, accommodation, and community protection measures and will be monitored by Notus and EPC through regular audits and inspections. Through these measures, the Project aims to minimise health, safety and security risks to local communities and workers and ensure compliance with EBRD and IFC requirements.

6. STAKEHOLDER CONSULTATION AND ENGAGEMENT

6.1 CONSULTATION ACTIVITIES THAT WERE CONDUCTED IN THE PROJECT AREA

A series of stakeholder engagement activities have been performed to date since start of the Project development and have covered the scoping phase.

Key Themes and Outcomes:

1. **Local Socioeconomic Context and Priorities**:

- Across all rural councils, agriculture remains the dominant economic activity, supplemented by hunting, fishing, and informal activities like scrap metal collection.
- Many communities highlighted a lack of investment in basic infrastructure, including roads, public transport, waste management systems, and community services (e.g., kindergartens, health posts, cultural houses).
- Unemployment, poverty, and seasonal labor fluctuations were recurring challenges, particularly affecting vulnerable groups such as retirees, large families, people with disabilities, and women.
- The effects of climate change on agriculture—such as drought, increased fertiliser use, and shifting sowing patterns—were reported by farmers in all three councils.

2. **Community Perceptions of the Project**:

- Initial perceptions in 2020 were mixed. While some stakeholders expressed hope for job creation and local economic growth, others were sceptical due to perceived lack of tangible benefits and concerns about health impacts (e.g., electromagnetic fields, noise).
- Some affected farmers expressed concerns over land inaccessibility and questioned the cost-effectiveness of wind energy. However, others—supported the project for its contribution to green energy and energy independence.

3. **Gender and Vulnerable Groups**:

- Engagements with women from affected households revealed their active roles in both domestic responsibilities and formal employment. They emphasized the need for equal participation in compensation decisions and expressed concerns about health and road conditions.
- Overall, women were more supportive of the project when they perceived potential for local development. However, some concerns persisted about unknown technologies and associated risks.

4. **Updated Engagement in 2025**:

- In January 2025, consultations with local authorities and businesses (CECA, Notus, and local councils) confirmed a shift toward more favorable views of the project due to increased energy insecurity caused by the ongoing war and frequent blackouts.

- Authorities did not raise objections to the project but expressed disappointment over delays in construction and unmet expectations based on prior social agreements.
- Demographic decline, labour shortages, alcoholism, and environmental concerns (e.g., illegal waste dumping, decommissioning of landfills, soil salinity) were key issues.
- Engagement with businesses confirmed that stakeholder consultations had been conducted throughout previous project stages (DPT, EIA 2019/2023, ESIA 2025), with strong support for the updated project concept.

Summary of Stakeholder Engagement under National Regulation (Table 6-3)

Stakeholder engagement for the wind energy project has been conducted in accordance with Ukrainian national regulations at all relevant planning stages, including Environmental Impact Assessment (EIA) procedures (2019 and 2023) and the preparation of the Detailed Plan of Territory (DPT) in 2024.

EIA (2019)

Public hearings for the initial EIA were held on October 2019. These hearings followed national requirements under the Law of Ukraine "On Environmental Impact Assessment."

No objections or proposals were received from the public during the hearings or during the overall public consultation period, and the process was closed in accordance with established procedures.

EIA (2023)

Due to martial law, the public hearings for the updated EIA were conducted virtually on December 5, 2023, in accordance with amended Cabinet of Ministers Resolution No. 989 (13.12.2017), as revised by Resolution No. 967 (08.09.2023).
The EIA process included two public consultation phases:

- Scoping phase (May 31–June 27, 2023): to determine the scope and level of detail required for the EIA Report.
- Main EIA consultation (November 16–December 20, 2023): for review and comment on the EIA Report itself.

During the process, written comments were submitted by the NGO Ukrainian Environmental Protection Group. The Ministry reviewed each submission and responded formally, noting whether the suggestions were accepted, partially accepted, or rejected with justification. No further comments were received from the public during the final consultation period.

Detailed Plan of Territory (DPT) (2024)

A public hearing on the DPT was held in 2024. The plan supports the construction and operation of renewable energy facilities, including wind and solar plants.

The hearing was chaired by the Acting Head of the Urban Planning and Architecture Department, with attendance by local planning and environmental officials and a representative of the project developer. However, no members of the public were present.

The plan presentation covered zoning, land use changes, topographical updates, fire and sanitary safety, and provisions for heritage protection. Although minor design adjustments

were incorporated based on expert input (e.g., increasing turbine height and incorporating water tanks), no public objections or proposals were submitted, and the plan was approved and recommended for adoption.

6.2 FUTURE STAKEHOLDER ENGAGEMENT AND CONSULTATION

6.2.1 Disclosure

The Non-Technical Summary (NTS) and SEP will be published on the Project's official website, in Ukrainian and in English. The National EIA has been already published on the Ministry of Ecology's official website in accordance with national requirements[14].

[REDACTED] The Company's managers and staff will cooperate with relevant local municipal authorities and departments during project design and throughout the implementation of each Project component.

[REDACTED] The Company, with the support of local municipal authorities and community councils, will implement active and ongoing stakeholder engagement in accordance with the Stakeholder Engagement Plan (SEP) and the requirements of EBRD Performance Requirement 10. Engagement will go beyond the provision of information and will ensure that affected and interested stakeholders, including residents, land users, and local businesses located in or near the Project area, are meaningfully consulted throughout the Project lifecycle.

Disclosure of information will not be limited to website publication, Project information and ESIA summaries will be made available through multiple channels, including community meetings (small groups due to the war related risks), municipal offices, local notice boards, and electronic communication platforms.

Stakeholders will be provided with clear opportunities to provide feedback, raise concerns, and ask questions, both during consultation events and through ongoing engagement channels. Feedback received from stakeholders will be documented, reviewed, and taken into consideration in Project decision-making, with responses communicated back to stakeholders.

Through these measures, the Project will ensure that stakeholder engagement is inclusive, transparent, and continuous, and that local communities have meaningful opportunities to influence the Project and understand how their views have been considered.

6.2.2 Timetable

Based upon the current ESIA schedule the timetable for disclosure is summarized below:

- Disclosure of the NTS = April 2026
- Disclosure of the SEP = April 2026

NTS and SEP will be disclosed in Ukrainian and English and made publicly available through multiple channels to ensure broad and meaningful access by affected and interested stakeholders. Disclosure will commence no later than 30 calendar days prior to the start of construction activities and will remain available throughout the construction phase.

[14] http://eia.menr.gov.ua/places/view/4112

Disclosure activities will include publication of the documents on the Project's official website, placement of hard copies or summaries at municipal offices and, and dissemination of information through local media and community notice boards. In addition, targeted disclosure activities will be undertaken, including community briefings and meetings where Project representatives will present and explain the key findings of the ESIA, anticipated impacts, mitigation measures, and construction schedule, and respond to questions from stakeholders.

Stakeholders will be provided with clear opportunities to submit comments and feedback during the disclosure period, written submissions, email, telephone, and other remote communication channels. All comments received during the disclosure period will be documented and considered, and responses will be provided to stakeholders in accordance with the Stakeholder Engagement Plan.

Taking into account the ongoing security situation and potential restrictions related to the armed conflict, the Project recognises that in-person public meetings may not always be feasible or safe. Where such restrictions apply, alternative engagement and disclosure methods will be used to ensure continued stakeholder access and two-way communication. These may include online meetings, telephone consultations, distribution of printed information through municipal channels, and use of local digital platforms (such as community websites and messaging applications). These measures are intended to ensure that stakeholder engagement remains inclusive, accessible, and effective while prioritising the safety of all participants.

Through this approach, the Project will ensure that disclosure and consultation activities are conducted in a transparent, adaptive, and culturally appropriate manner, consistent with the requirements of EBRD Performance Requirement 10.

6.2.3 Other Engagement Activities

Stakeholders will be actively engaged throughout Project implementation through structured, ongoing consultation, information disclosure, and grievance management mechanisms. Project information will be shared with community leaders and other key local representatives through meetings, advance briefings prior to the commencement of construction activities, and periodic updates during construction and operation. These engagements will cover construction schedules, expected impacts (e.g. noise, traffic, access restrictions), mitigation measures, and upcoming works.

In addition to meetings, Project updates will be disseminated through written notices, information boards in community buildings, municipal websites, and local digital communication channels, ensuring that information reaches a wider audience beyond community leaders. Community leaders will be encouraged to relay Project information to residents and to communicate community concerns, questions, and feedback back to the Project Company.

Stakeholders will also have direct access to Project representatives, including the Community Liaison Officer, through dedicated communication channels (telephone, email, in-person meetings), ensuring a two-way flow of information rather than one-directional disclosure. Feedback and concerns raised by stakeholders will be documented, reviewed, and responded to, and where appropriate, incorporated into Project decision-making and mitigation measures.

6.2.4 Methods of Communication

The methods of communication to be utilised during pre-construction and construction phase of the project will include:

- Publication for public review of the SEP and Non-technical Summary.
- Meetings with regulatory bodies.
- Public meetings.
- Published updates on local council website or Facebook page (It will depend on whether the local administration allows it due to martial law).
- Announcements in local media.
- Provision of general information on noticeboards at key public locations.
- Disclosure of monitoring reports.
- Announcements in wide used messengers by locals.

6.2.5 Stakeholder Engagement Plan

Stakeholder Engagement is an on-going process that involves: stakeholder analysis, stakeholder planning, disclosure of information, consultation and participation, grievance mechanism, and on-going communication with nearest affected villages to the Project area. A Stakeholder Engagement Plan (SEP) is developed and implemented that is scaled to the Project risks and impacts and development stage, and be tailored to the characteristics and interests of the key stakeholders.

The SEP for the Project describes the planned stakeholder consultation activities and engagement process and includes the following:

- Define the Project's approach to future stakeholder engagement
- Identify stakeholders within the area influenced by the Project
- Profile identified stakeholders to understand their priorities
- Propose an action plan for future engagement with identified stakeholders
- Set out the grievance/project complaints mechanism

The Developer is committed to implementing the requirements of the SEP throughout the lifetime of the Project. The SEP is provided as a standalone document.

Environmental and Social Management of the Project

The Project will be implemented under an established Environmental and Social Management System (ESMS) developed by the Company [REDACTED] (Notus) in line with Ukrainian legislation and international standards, including EBRD Performance Requirements and IFC Performance Standards. The ESMS provides a structured framework to identify, manage, and monitor environmental and social risks throughout construction and operation. It includes a clear Environmental and Social Policy, defined roles and responsibilities, topic-specific management plans (such as health and safety, biodiversity, traffic, noise, waste, and community health and safety), monitoring and reporting procedures, and grievance mechanisms for workers and communities. The Environmental and Social Management Plan (ESMP) is the key operational document of the ESMS and will be implemented by the Project Company and contractors, supported by regular inspections, audits, and adaptive management to ensure continuous improvement of environmental and social performance over the Project lifecycle.

Mitigation

The Project has been designed and will be implemented in accordance with Ukrainian legislation and international best practice, including EBRD Performance Requirements and IFC Performance Standards. A comprehensive set of mitigation and monitoring measures will be applied during construction and operation to prevent, minimise, and manage potential environmental and social impacts.

Visual impacts will be addressed to ensure that any residual effects experienced by local communities are offset by tangible social benefits. During construction, air quality impacts will be minimised through dust suppression measures, proper maintenance of construction equipment, and strict compliance with the Construction Management Plan. Land disturbance will be limited by minimising construction areas and access roads, enforcing vehicle movement restrictions, and reinstating agricultural and grassland areas once works are completed.

Biodiversity protection measures will be implemented in line with the Biodiversity Management Plan and EIA conclusions. This includes inspections to prevent fauna from entering construction areas, with safe removal and relocation if necessary. Although impacts on bats and birds are assessed as low, monitoring will be carried out during construction and operation to verify predictions. Bat monitoring will follow EBRD PR6 requirements, while bird monitoring will include vantage point surveys, use of specialised observation equipment, and post-construction fatality monitoring in line with EBRD and IFC guidance, supported by adaptive management if required.

Measures to protect water, soil, and geological resources include preventing spills, and maintaining equipment in line with construction management procedures. Cultural heritage will be protected through the application of a Chance Find Procedure, with training for workers and immediate notification of authorities if any previously unknown heritage is discovered.

Noise impacts have been assessed using industry-standard modelling software and are predicted to comply with applicable standards. A Noise Management Plan will apply during both construction and operation, including grievance-based monitoring and additional measurements where justified. Shadow flicker impacts will be mitigated through the installation of control modules on specific wind turbines to ensure compliance with IFC guidelines.

Traffic and transport impacts will be managed through route surveys, baseline road condition assessments, and implementation of a Transport Management Plan, including specific arrangements for oversized turbine components and advance communication with authorities and communities. Land acquisition has been carried out through voluntary, market-based lease agreements in compliance with EBRD PR5 and IFC PS5, with no involuntary resettlement or livelihood restoration required.

Community and worker health, safety, and security will be managed through dedicated Health and Safety, Community Health and Safety, Security, and Emergency Response Plans. The workforce will be mainly recruited locally or regionally and accommodated in existing facilities. Worker behaviour will be governed by a Code of Conduct, training, and regular monitoring. A grievance mechanism will be available to communities and land users throughout the Project lifecycle.

Overall, with these measures in place, the Project is not expected to result in significant adverse environmental or social impacts, and ongoing monitoring will ensure effective management and continuous improvement throughout construction and operation.

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