



# Non-Technical Summary

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*KOSIT a.s. – K3 Waste-to-Energy Facility*

October 2025

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## 1. Introduction

The European Bank for Reconstruction and Development (“EBRD”) is considering providing finance to KOSIT a.s – a waste management company based in Slovakia. The loan will be used to finance a new ‘waste-to-energy’ (WtE) facility in Košice. A WtE facility is a plant that converts non-recyclable waste into usable energy. This process involves incineration, where waste is burned to produce steam, which then drives turbines to generate electricity.

The new WtE facility, known as “K3”, will be located on the same site as KOSIT’s existing WtE facilities (K1 & K2). This site is in southern Košice, near the village of Kokšov-Bakša.

The new K3 facility will make use of some existing infrastructure at the current WtE site, but a new substation, a 2.9km 110 kV overhead transmission line (OHTL), and a 7km hot water pipeline (HWP) will also be built to support the new K3 facility. The OHTL and substation will be constructed by Východoslovenská distribučná a.s. (VSD), part of the ZSE Group. The HWP contractor has not yet been selected. The HWP will also be part-funded by the EBRD’s proposed loan. No other KOSIT investment plans or operations will be financed by the loan.

This Non-Technical Summary (NTS) provides a description of the Project and presents the potential environmental and social benefits and adverse impacts associated with the construction and operation of the planned K3 facility. It also describes how these impacts will be mitigated and managed through all phases of the Project. In addition, it provides a summary of the approach to future stakeholder engagement that is outlined in more detail in the available Stakeholder Engagement Plan (SEP).

## 2. What does the Project include?

### 2.1 The Project

The K3 Project in Košice aims to reduce Slovakia’s reliance on landfilling. It hopes to do this by diverting 100,000 tonnes of non-recyclable waste each year from landfill to the K3 site for energy generation. The Project will contribute to Slovakia’s targets to decrease the share of landfilled waste to below 10% by 2030 by utilising redirected waste from existing landfills as input for the new WtE facility. This will help the country meet EU climate and waste targets.

This Project will also support the EU Green Deal —the EU’s roadmap to become climate-neutral by 2050—by cutting emissions and promoting cleaner energy. The Project also aligns with EU Circular Economy goals. These are goals focused on reducing waste and keeping materials in use for as long as possible through recycling, reuse, and recovery. By recovering energy and materials from residual waste, the Project contributes to these aims.

Overall, in comparing the baseline (without development) with the K3 line operation, there is a net reduction in GHG emissions of 72,504 tCO<sub>2</sub>e/yr. Without the Project, waste to landfills would not be diverted to the K3 line and GHG emissions will not be reduced. As presented in the EIA document (see Section 2.3), the Project provides the following benefits when compared to not building the Project:

- Increases to the energy recovered from waste.

- Reduction in the amount of waste disposed of in landfills.
- Reduction in the amount of fossil fuels used to fuel the demands of heat and electricity consumers, providing the desired increase in independence from their supply.
- Reduction of greenhouse gas emissions compared to a situation where the waste of interest would be disposed of by landfilling.
- Creation of new jobs and the stabilisation of existing employment.

The Project also supports the targets of Slovakia's Waste Management Plan and enhances energy security by supplying electricity and heat. The Project meets EU energy efficiency standards and qualifies as a sustainable investment under the EU Taxonomy Regulation. The Regulation defines what constitutes an environmentally sustainable investment.

The K3 Project will produce both electricity and heat, supporting the national power grid and the local district heating system. By being built within the existing KOSIT complex, the Project will benefit from shared infrastructure and services, helping to reduce environmental and social impact and avoid the need for new land for the plant. A model of the new K3 site presented in Figure 2-1 below:

**Figure 2-1 – New K3 Facility Layout**



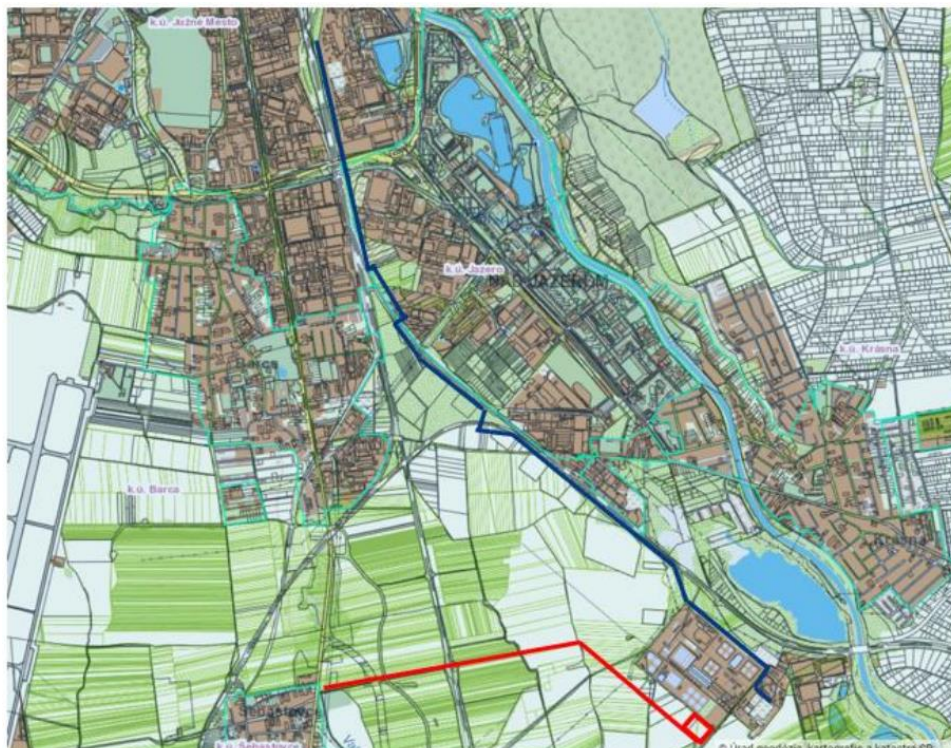
The location of new K3 facility is also presented in Figure 2-2 below, as well as the location and alignments of the OHTL and HWP in Figure 2-3 below. The 2900m 110 kV line will run from the new substation immediately next to K3 site to Šebastovce. It will run across agricultural land and intersects with a class III road, a railway, sewerage infrastructure, and five high-voltage lines. The HWP will be primarily laid underground (6.02km), while the aboveground route (0.98km) will follow the route of an existing pipeline. The proposed route of HWP mostly passes dense shrubbery and bare areas of no ecological importance close to the railway entering Košice from the south. The route will largely pass agricultural plots to the south and industrial zones to the north:



Figure 2-2 – K3 Project Location



Figure 2-3 – Substation, OHTL (red line) and HWP (blue) Location and Alignments



## 2.2 Project Status

The K3 Project is progressing through its permitting and procurement phase. Following the completion of the national Environmental Impact Assessment (EIA) and submission of zoning documentation, the Project is now finalising permits and preparing for tender launch and contractor selection by late 2025. Construction is expected to begin in 2026, with operations targeted for 2029.

## 2.3 EIA and permitting Status

### EIA

The K3 Project required a full Environmental Impact Assessment (EIA)<sup>1</sup> under Slovak law. The EIA was developed by an independent consultant (EKOS PLUS s.r.o) and published in December 2022. The EIA approval process included reviews by national and regional authorities, public consultation, and assessments of greenhouse gas emissions, cumulative impacts, and resource use. The final approval was issued by the Ministry of Environment on 24 April 2023. Separately to this, the OHTL EIA<sup>2</sup> was published in January 2023 and the HWP environmental screening<sup>3</sup> in June 2024, with both being subsequently approved.

### Permitting

The K3 Project has received all the necessary permits required to date, including the final Environmental Impact Assessment (EIA) approval in April 2023. The zoning permit has been issued and the building permit will be obtained by the EPC contractor in Q4 2026. Further permits will be attained, when necessary, such as the Integrated Pollution Prevention and Control (IPPC) permit prior to start of commissioning / operations. Overall, permitting is well underway, with full compliance expected as the Project progresses toward construction and operation.

## 2.4 Supplementary E&S Report and Environmental and Social Action Plan

As well as the official EIA and permitting conducted, an Environmental and Social Due Diligence was also undertaken of the Project and KOSIT, in order to comply with EBRD's 2019 Environmental and Social Policy (ESP). The resulting Environmental and Social (E&S) Assessment Report identified gaps in the existing EIA and KOSIT practises, and outlined actions in order to meet ESP requirements.

A Supplementary E&S Report has been published with this NTS (and SEP), to fill the gaps in the EIA analysis in order to meet EBRD's requirements for the contents and quality of environmental and social impact assessments. These three documents are publicly available and subject to feedback from the public.

The Environmental and Social Action Plan (ESAP) for the K3 Project presents further environmental, social and health and safety actions for KOSIT to complete. This has been developed for the Project to address gaps with ESP requirements. Each action specifies responsibility, deadlines, and closure criteria. It is also disclosed as part of the Supplementary ESIA package with this NTS, Supplementary E&S Report, and SEP.

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<sup>1</sup> National EIA available at <https://www.enviroportal.sk/eia/detail/zevo-kosice-modernizacia-zabezpecenie-prevadzkovej-stability-zariadeni>.

<sup>2</sup> <https://www.enviroportal.sk/eia/detail/vystavba-es-110-kv-vedenia-sebastovce-barca>

<sup>3</sup> <https://www.enviroportal.sk/eia/detail/kosice-rozsirenie-horucovodnych-vedeni>

### 3. Why is this new WtE facility required?

This new WtE facility is required for the following reasons:

- **Too much waste is landfilled** – Slovakia sends around 40% of its municipal waste to landfill—twice the EU average.
- **Not enough waste is turned into energy** – Only 8% of waste is currently used to produce energy.
- **K3 helps fix this** – It will take 100,000 tonnes of waste that can't be recycled and turn it into useful energy instead of burying the waste.
- **Better for the environment** – K3 will cut over 72,000 tonnes of harmful emissions each year and will supply electricity and heating to Košice, reducing the need for fossil fuels.
- **Electricity generation** – K3 will have a higher electricity generation yield (0.72MWh per tonne of waste processed) versus the average figures reported for K2 (~0.6MWh per tonne of waste processed) between 2023 and 2024. The K3 facility will generate approximately 55,000 MWh of electricity annually, equivalent to 25 000 households' annual supply.
- **Heat generation** – The new K3 line will add up to 35MWth of annual heat generation capacity and KOSIT will be able to supply up to 160,000 MWh of heat per year from 2030 from all 3 lines, equivalent to 30 700 households' annual supply (18 500 from K3 only).
- **Supports EU and Slovak plans** – K3 helps meet EU and national goals to reduce landfill and fight climate change. The Project also meets EU standards for green and efficient energy Projects.

### 4. What is the benefit of the Project to local people and the economy?

This new WtE facility will provide the following benefits to the local area:

- **Cleaner and more reliable energy for the community** – The K3 facility will turn non-recyclable waste into electricity and heat, helping power homes and buildings in Košice. This reduces the need for landfills and supports Slovakia's move toward greener energy.
- **Employment Opportunities** – The Project is expected to employ over 320 people during construction and create around 25 permanent jobs during operation, in addition to the 1139 workers already employed by KOSIT. Some international contractors will bid to lead the construction of the K3 Project, however the majority of construction jobs will still be available to Slovakian workers. KOSIT will develop a Labour Management Plan for K3 plant that includes fair recruitment, working conditions, and worker grievance mechanisms.



## 5. What will be the potential adverse socio-economic impacts of the Project and how will they be mitigated?

### Land and Economic Impacts

No land acquisition or permanent resettlement of people or economic displacement will be caused by the new WtE facility as it will be installed within the existing KOSIT complex and shares infrastructure with K1 and K2 for logistics and utilities. However, there will be limited and mostly temporary land acquisition relating to the OHTL and HWP.

Easement agreements are currently being agreed with all landowners of plots to be used for the OHTL and HWP, while land for the substation next to the K3 site has been sold willingly to VSD by the previous owners. No involuntary easement impositions have been necessary in order to secure these easements to date and will be avoided on this Project. In the unlikely scenario that landowners decline the easement agreement, KOSIT will attempt to design an alternative route. If this is not feasible and no other options are available, KOSIT will be required to resort to involuntary acquisition via expropriation, and any losses of land or assets and associated livelihood impacts would need to be compensated and/or mitigated in line with EBRD's requirements in a Livelihood Restoration Plan (LRP) in order to ensure full mitigation of any impacts to land users. However, given that the HWP alignment has been designed in order to avoid any informal settlements and economic displacement, following existing utilities routes and the boundaries of land plots, any livelihood impacts are expected to be minimal or mitigated via LRP implementation.

The overhead transmission line and hot water pipeline may temporarily affect small amounts of farmland currently used for agriculture. However, KOSIT will ensure that all farmers are able to harvest their crops before construction starts so no economic impacts are caused.

No impacts on site of cultural heritage are predicted on this Project. However, the contractors for all Project components will implement a chance finds procedure to protect any previously unknown cultural or heritage resources from accidental damage or disturbance during project construction and operation.

### Water

No issues regarding the Project's existing and planned use of water have been identified. A Water Treatment Facility will be built as part of the K3 WtE plant that will produce make-up water for the boiler (aka clean water that replaces water lost during the plant's operation to keep things running smoothly) and other water needs. This raw water will be industrial water sourced from US Steel Košice, which will be piped from the interface point to the water treatment facility.

For drinking water, a pipeline connection will be established from the industrial park's main drinking water pipeline. The contractor for K3 plant will provide water consumption and discharge water analysis confirming sustainability of water needs. No impact on other water users are expected due to the following factors: a) industrial water will be sourced from US Steel, a non-drinking water source; b) construction water demand will be relatively small; c) 25 additional staff will be employed on site, not significantly



impacting the availability of drinking water; and c) water scarcity in Košice is classified as low<sup>4</sup>.

### **Traffic Safety and Logistics**

No significant pressure on the local road network and traffic is expected to be caused by the Project. There may be a brief period of inconvenience for the businesses and settlements neighbouring the K3 site that include Kokšov-Bakša and Krásna when the materials and construction equipment are transported and delivered. Access may be affected on certain surrounding roads during this period; however this is expected to be very minor and temporary. Traffic Management measures will be included in the contractor's Environmental, Health and Safety and Social Management Plan (CESMP), as per the requirements of the traffic study undertaken as part of the EIA.

### **Community Health and Safety**

Local residents may experience temporary increases in dust, noise, and traffic during the construction phase. The recommendations included in the EIA, such as sprinkling roads to reduce dust, covering loose materials, and limiting noisy work timings, will be implemented by KOSIT.

Social issues may also be caused by construction workers from outside the area entering the Project area. However, KOSIT will implement an Influx Management Plan to ensure these impacts are avoided or adequately managed. KOSIT will ensure all people working on and entering the site are appropriately inducted and trained in their Code of Conduct. Further all interaction with local community will be monitored and grievance mechanisms are available to any member of the Project workforce and nearby communities (see Section 9).

The Health Impact Assessment of the EIA also concludes that there will be no impacts on community health during the operation of the site. The study concludes that “even the maximum short-term concentrations of pollutants that occur under adverse dispersion conditions, at which the impact of a given source on air pollution is highest, are not significant from the point of view of effects”. Further, the noise and vibration study found a “satisfactory acoustic situation” at the closest measuring point (the nearby homeless shelter), and lowest odour threshold for ammonia is much higher than the maximum short-term concentration of ammonia from site activities in the immediate vicinity and therefore should not be smelled by residents. It is therefore not anticipated that local communities will be impacted by air quality, noise emissions and odour above the EU limit values.

KOSIT will also prepare an Emergency Preparedness and Response Plan for the construction and operation of the site, with defined roles and communication channels between the site and local communities.

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<sup>4</sup> Further information available here: <https://thinkhazard.org/en/report/2669-slovak-republic-kosice/DG>

## 6. What will be the key environmental impacts of the Project and how will they be mitigated?

### Emissions to Air

The K3 facility will emit particles and gases to the air. These include nitrogen oxides (NO<sub>x</sub>), acidic gases, dust, and trace pollutants such as dioxins and heavy metals. These are the by-products of burning municipal solid waste.

To control these emissions, the new facility will use advanced flue gas treatment (FGT) systems. This treatment includes methods for neutralising acidic gases and minimising harmful gas releases by reacting the gases with other compounds including calcium hydroxide, activated carbon. Therefore, concentrations of these emissions will be within limits as outlined in the EU Best Available Techniques (BAT) Conclusions for Incineration of Waste (2019). These are EU benchmarks for minimising industrial emissions. K3 will meet BAT-AELs for all pollutants applying advanced abatement systems (SNCR, activated carbon, and lime injection) and dispersion modelling to optimise the stack height. A Continuous Emissions Monitoring Systems (CEMS) will also be installed to track the release of these particles and gases in real time. This will allow KOSIT to shut down the facility instantly if the emissions reach the maximum levels permitted in Slovakian law. Additionally, dispersion modelling — a technique used to simulate how emissions spread in the air—will be applied at the time of designing the equipment to ensure the designs are safe and the plant is compliant with air quality standards.

### Waste Management

The K3 Project will process 100,000 tonnes of municipal solid waste annually, which significantly reduces landfill dependency. The process will generate residual waste such as bottom ash and fly ash which will be assessed to determine if it is classified as hazardous waste.

These waste streams pose risks of contamination, and odour, on local disposal infrastructure. To mitigate these impacts, the facility will implement strict segregation and secure storage for hazardous materials and reuse bottom ash where feasible. Enclosed waste areas will limit odour and litter, with monthly reports and monitoring ensuring compliance.

Fly ash undergoes regular testing. Thus, it can be treated by solidification before final disposal on landfills. Bottom ash is also used to stabilise KOSIT's non-hazardous waste landfills. If the fly ash tests confirm its content classification as hazardous, it will be first treated prior to disposal by a licenced company. The bottom ash / slag is non-hazardous waste that is sent to landfill for stabilization and can be also reused in local cement manufacturing industry.

### Water and Wastewater Management

A new Water Treatment Facility will serve all three WtE lines (K1–K3). The design of this facility allows for water reuse and reduces wastewater discharge. As part of the Project designs, KOSIT and selected contractor will demonstrate a quantifiable reduction in water use compared with the pre-project baseline. As a new state-of-the art water treatment facility, it is expected that there would be improvements in water supply and demand efficiencies and performance optimisation.

Wastewater is directed to the municipal wastewater treatment plant at defined discharge points, with the system structured to avoid local water body contamination.

### **Raw Materials and Energy Usage**

The Project will result in a reduced need for fossil fuels by supplying electricity and heat from municipal waste. It is expected to reduce CO<sub>2</sub> emissions by over 72,000 tonnes annually.

### **Visual Impacts**

The new facility is planned at an existing industrial site, and will include a stack (aka chimney) currently estimated at 68 metres tall, as well as auxiliary infrastructure such as hot water pipeline, transmission lines and substation, which will have visual impact on the current landscape. This could influence the visual environment for local communities.

A Landscape and Visual Impact Assessment (LVIA) has been conducted to identify and manage potential visual impacts. The facility's placement on an existing industrial site is intended to minimise additional visual changes, with no viewpoints to protected or attractive sites being impacted.

### **Biodiversity**

The Project (K3, OHTL, HWP) is situated outside any designated protected area. Two protected areas have been identified within 2km of the K3 site: Dolný tok Hornádu Special Area of Conservation (SAC), located approximately 350m east of the Project at its closest point; and Košická Kotlina Special Protection Area (SPA), located approximately 1.2km south/south-east of the Project at its closest point – both sites designated under the EU Habitats Directive. Košice Valley KBA (Key Biodiversity Area) internationally recognised for protection of birds is spatially aligned with this local SPA. The compliance with EU Habitats Directive confirmation was provided through a formal opinion from the Ministry of Environment with regards to the SPA, not requiring any Appropriate Assessment. The Project does not involve the use of forest land or forestry resources, and affected land is primarily industrial and agricultural.

After additional screening of the species and habitats in line with EBRD ESP, it was confirmed that there are no significant impacts predicted for any biodiversity receptors (including Critical Habitat (CH)<sup>5</sup> and Priority Biodiversity Features (PBF)<sup>6</sup> from the Project, HWP and OHTL. There are species of elevated conservation concern (i.e. listed on an Annex IV of the Habitat and Annex 1 of Birds Directives, bats species under Resolution 6 of the Bern Convention and river mollusc on the IUCN Red List) in the Project area of influence, however, no suitable habitats to support them are located in the proximity to the Project or the impact can be avoided. There are no known congregations of migratory birds, and no records of waterbodies in close proximity to the Project site and associated HWP, OHTL (based on a review of online resources such as

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<sup>5</sup> The most sensitive biodiversity features are defined as critical habitat, comprising one of the following: (i) highly threatened or unique ecosystems; (ii) habitats of significant importance to endangered or critically endangered species; (iii) habitats of significant importance to endemic or geographically restricted species; (iv) habitats supporting globally significant migratory or congregatory species; or (v) areas associated with key evolutionary processes (EBRD Environmental and Social Policy 2019, Performance Requirement 6).

<sup>6</sup> Priority Biodiversity Features are a subset of biodiversity, which are irreplaceable or vulnerable, but at a lower priority level than critical habitats (EBRD Environmental and Social Policy 2019, Performance Requirement 6).

eBird and IBAT). The only species on IUCN Red List are Endangered (EN) thick-shelled river mollusc that eDNA sampling identified in 500m from the site where dry and wet (acid rain) deposition modelling confirmed no significant load to create impact on this species.

Nevertheless, the Project may cause disturbances to local flora and fauna, particularly during the construction phase. The CESMP will therefore include measures to protect any identified sensitive biodiversity during construction and manage potential risks from invasive species. As a precautionary measure a suitably qualified ecologist will complete a pre-construction walkover of all areas outside of the Project site where construction work will be required. This will be undertaken, once designs of the OHTL and HWP are finalised to fully ascertain any presence/likely absence so that an appropriately robust mitigation strategy can be produced that delivers compliance with PR6.

Any buildings and mature trees that will be subject to loss or disturbance will also be first surveyed to see if any bat roosts are supported. The same also applies to nesting birds requiring pre-works checks of suitable habitat/features for nests during March-August. To minimise birds' OHTL collision and electrocution risks an ornithologist will review design when it is ready and advise on any bird divertors and insulator design prior to line energising.

### **Construction Dust and Noise**

Construction activities will generate dust and noise, which may affect nearby residents and workers. Construction activities will be managed through a dust risk-based assessment and noise control measures. Sensitive receptors have been identified, and mitigation includes enclosed waste handling, scheduling noisy activities during daytime hours, and using low-noise equipment. Noise levels are expected to remain within regulatory limits.

## **7. Occupational health and safety (OHS) measures**

KOSIT implements robust health and safety policies and practises. A dedicated, full-time Project Environment, Health, Safety and Social Manager will be appointed to oversee both the construction and operational phases of the Project. For construction phase, all OHS requirements will be communicated to the EPC Contractor. The EPC Contractor will assign qualified health and safety personnel to develop and implement a Project-specific Construction Environmental and Social Management Plan and a HSE Plan.

All subcontractors and third-party service providers are required to comply with the contractors HSE Plan. Subcontractors must also create and follow their own health and safety plans that meet the standards set out in the HSE Plan. Alternatively, they can adopt the EPC Contractor's health and safety system—if they get formal approval from the Project.

The original construction of the K1/K2 sites took place between late 1988 and 1990, a period when asbestos-containing materials may have been used in both initial construction and later modifications. KOSIT will conduct an asbestos survey at the current K1 and K2 sites, identify areas if/where asbestos could be affected during the K3 facility construction, and prepare a plan for non-disturbance and/or safe removal if required.



## 8. Best Available Techniques

### 8.1 What are Best Available Techniques?

Best Available Techniques (BATs) are the most effective ways to reduce environmental impact. They're required under EU law, specifically the Industrial Emissions Directive (IED). The IED is a set of rules designed to limit pollution from industrial activities and protect human health and the environment. These techniques help ensure pollution is minimised as much as reasonably possible. Applicable to K3 Project are the BREF for Waste Incineration and the BAT Conclusions for Incineration of Waste.

### 8.2 What key BATs will be used in this Project?

#### Air Emissions Control

K3 will use advanced systems to reduce harmful air emissions. The following will be undertaken:

- Selective Non-Catalytic Reduction (SNCR) will be installed to abate NO<sub>x</sub> by reaction with urea injected via nozzles into the first pass of the boiler.
- A semi-dry Flue Gas Treatment (FGT) will be installed and comprise of a reactor for cooling the gas, injection of reagents (activated carbon and hydrated lime). The bag house filter system will abate dust emissions. Hydrated lime is used for reaction with acidic gases to form solid products that are removed by the bag filters. Activated carbon is used to remove pollutants like metals, dioxins and furans by adsorption.

Emissions will be tracked by CEMS to stay within legal limits. The following will be continuously measured, with the following legal BAT limits, where relevant:

- Atmospheric pressure;
- Flue gas flow (m<sup>3</sup>/s);
- Flue gas temperature (°C);
- Flue gas pressure (kPa);
- H<sub>2</sub>O content (% vol.);
- O<sub>2</sub> content (% vol.), wet or dry – 11% dry basis;
- CO<sub>2</sub> content (% vol.), wet or dry;
- Dust content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) - ≤ 5 mg/Nm<sup>3</sup>;
- HCl content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) - ≤ 6 mg/Nm<sup>3</sup>;
- SO<sub>2</sub> content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) - ≤ 30 mg/Nm<sup>3</sup>;
- NO<sub>x</sub> (or NO + NO<sub>2</sub>) content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) - expressed as NO<sub>2</sub> - ≤ 130 mg/Nm<sup>3</sup>;
- NH<sub>3</sub> content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) - ≤ 10 mg/Nm<sup>3</sup>;
- TOC content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) - ≤ 10 mg/Nm<sup>3</sup>;
- CO content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) - ≤ 50 mg/Nm<sup>3</sup> (daily avg); ≤ 100 mg/Nm<sup>3</sup> (half-hour avg);

- HF content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) -  $\leq 1$  mg/Nm<sup>3</sup>; and
- Hg content (mg/m<sup>3</sup> or mg/Nm<sup>3</sup>) -  $\leq 0.05$  mg/Nm<sup>3</sup>.

Other pollutants, mainly heavy metals and PCDD / PCDF will be monitored periodically using a third party emissions monitoring company to perform stack testing.

### **Ash and Waste Handling**

Bottom ash and fly ash will be managed separately to improve safety. As stated above, fly ash is treated by solidification by an authorised waste company before disposal on landfills. If the fly ash is classed as hazardous, it will be first treated prior to disposal by a licenced third party. As it is non-hazardous, bottom ash / slag is also sent to landfill or treated by an authorised waste management company.

### **Water Use and Treatment**

The K3 facility aims to reuse process water wherever possible and minimise wastewater discharge. The Water Treatment Plant planned will clean incoming industrial water on-site. Any plant discharge water, rainwater or stormwater collected in the on-site drainage system will continue to be captured and sent to the neighbouring municipal wastewater treatment plant (WWTP). This will ensure that the water is clean and safe before it is discharged into the nearby River Hornád.

### **Odour and Dust Control**

Waste will be stored and processed in enclosed spaces to prevent smells and airborne pollutants from escaping. Sprinklers and misting systems will be used to suppress dust and odours during waste handling and transport. These methods will keep the site cleaner and more pleasant for nearby communities.

### **Safe Operation**

A Distributed Control System (DCS) is a computerised system that automatically monitors and controls industrial processes across different parts of the plant. KOSIT will install this in order to manage the entire combustion process. It ensures the plant runs efficiently and safely, especially during start-up and shutdown phases.

### **Strict Emission Limits**

The facility will meet tight limits for pollutants. Controlling these substances ensures the plant operates with minimal environmental impact.

## **9. What about Stakeholder engagement?**

Stakeholder engagement for the K3 Project has included a public hearing, which was part the national EIA process in July 2022, and was held at Košice City Hall. The hearing was attended by representatives from KOSIT, local government, national government and members of the public. Emissions, equipment standards, and waste sourcing were queried by participants, with clarifications provided by KOSIT.

A Stakeholder Engagement Plan (SEP) has been developed to clearly outline the further engagement activities to be undertaken by KOSIT regarding the K3 Project and is part of the ESIA disclosure package. The latter is disclosed at Kosit and EBRD websites, and additional locations listed in SEP for hard copies availability. This package is

subject to public consultations and comments during 60 days period in Q4 2025 with additional stakeholders meeting to consult on supplementary ESIA package.

The SEP identifies the key stakeholders and effective engagement methods. It will ensure that the opinions and concerns of stakeholders, including citizens of Košice, are understood, responded to and included within the design, development and execution of the Project when applicable. The objective of these engagement activities is to be inclusive, proactively engaging with women and other groups less likely to engage in the consultation process.

The following engagement activities will be undertaken:

- Consultations with district and regional authorities for permits and local emergency services regarding updated emergency response plans;
- Public meetings open to local communities, including any vulnerable groups;
- Direct meetings with site neighbours (e.g. the homeless shelter) to provide updates on the construction process;
- Virtual and face-to-face meetings for local and national NGOs to ask questions about the Project;
- Face-to-face meetings with landowners during the remaining HWP easement agreements;
- Although unlikely, follow-up meetings with any landowners and users who do not willingly sign easement agreements in order to inform the development of an LRP;
- Engagement with local councils and businesses regarding job and procurement opportunities; and
- Regular reporting to the public via annual sustainability reporting and to the EBRD as part of reporting to Lender obligations.

KOSIT has a set up a procedure for submitting public complaints. Affected persons can report:

- At the sites using the grievance box at the site entry
- At KOSIT office using the grievance box
- Via email; or
- Online through the website.

## 10. Contacts

Contact details and responsibilities for the Project are as follows:

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