

BLUE 3 PHOTOVOLTAIC PROJECT, ALBANIA

Land Acquisition and Livelihood Restoration Plan (LALRP)

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Tirana, Albania

REPORT SUMMARY

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Abbreviations

ABKONS	ABKONS Consulting Ltd.
AC	Alternating Current
ACA	Albanian Cadastre Agency
AU	Administrative Unit
CLO	Community Liaison Officer
DC	Direct Current
DCM	Decision of the Council of Ministers
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
EU	European Union
EUR	Euro
GRM	Grievance Redress Mechanism
LALRP	Land Acquisition and Livelihood Restoration Plan
MEI	Ministry of Energy and Infrastructure
MW	Megawatt
NGO	Non-Governmental Organization
OHL	Overhead Line
PAP	Project Affected Person
PV	Photovoltaic
RSK	RSK Group (Independent Environmental and Social Consultant)
SAE	State Agency for Expropriation
SCADA	Supervisory Control and Data Acquisition
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
TAP	Trans Adriatic Pipeline

1. Executive Summary

This Land Acquisition and Livelihood Restoration Plan (LALRP) has been prepared for the Blue 3 Photovoltaic (PV) Project in Fier Municipality, Albania, in accordance with the requirements of the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2024), specifically Environmental and Social Requirements (ESR) 1, 5, and 10, as well as applicable Albanian legislation.

The Blue 3 PV Project is a 36.16 MW solar energy facility located on approximately 59.25 hectares of privately owned land in Sheq Marinas, Fier Municipality. The Project forms part of Albania's renewable energy transition and will contribute to the generation of clean electricity while supporting national decarbonisation objectives.

The Project land has been secured through voluntary long-term lease agreements with private landowners. No expropriation, compulsory acquisition, or involuntary land taking has been undertaken. Ownership of the affected land remains with the landowners, while the Project obtains the right to use the land for the duration of the lease agreements.

A review of land tenure, site conditions, stakeholder consultations, and available socio-economic information confirmed that the Project does not require physical displacement of households, businesses, or community facilities. No residential structures are located within the Project footprint and no resettlement is anticipated.

The affected land is characterised by saline and degraded soil conditions with limited agricultural productivity and low economic value. No significant agricultural production, business activities, or livelihood-dependent land uses were identified within the Project footprint. Consequently, the risk of economic displacement is considered low.

The Project has applied the mitigation hierarchy consistent with EBRD ESR 5 by selecting a site that avoids settlements, productive agricultural land, community infrastructure, and environmentally sensitive areas. Potential impacts have been further minimised through the use of existing infrastructure corridors, voluntary lease agreements, and the consolidation of Project facilities within a defined development area.

Stakeholder engagement activities were undertaken with landowners, local authorities, and community representatives in accordance with EBRD ESR 10. Consultations focused on land use, lease arrangements, access requirements, construction activities, and potential Project impacts. No concerns relating to physical displacement or significant livelihood loss were identified. A Project grievance mechanism will remain available throughout the Project lifecycle.

Although no significant livelihood impacts are anticipated, this LALRP establishes an entitlement framework, livelihood restoration measures, monitoring programme, and implementation procedures to address any unforeseen impacts that may arise during construction or operation. Particular attention will be given to vulnerable individuals and households should impacts be identified.

Monitoring will focus on lease management, stakeholder engagement, grievances, access restrictions, employment opportunities, and any potential livelihood impacts. The Project Company will be responsible for implementing the LALRP, supported by the Community Liaison Officer and Project Land Team.

Based on the assessment undertaken, the Blue 3 PV Project is considered to have a low land acquisition and livelihood restoration risk profile. The use of voluntary lease agreements, the absence of physical displacement, and the limited productive use of the affected land indicate that the Project is broadly aligned with the objectives of EBRD ESR 5 and is expected to result in minimal land acquisition and livelihood impacts.

2. Introduction

2.1. Project Overview

The Blue 3 Photovoltaic (PV) Project is a utility-scale solar power development located in the Municipality of Fier, Albania, approximately 120 km southwest of Tirana. The Project is being developed by SPV Blue 3 Sh.p.k. and will have an installed capacity of 36.16 MW (AC). The Project site occupies approximately 58.5 hectares in the Sheq Marinas area and has been selected due to its high solar irradiation levels, proximity to existing electricity infrastructure, and limited alternative economic use of the land. The site consists predominantly of degraded marshy land with elevated salinity levels, rendering it largely unsuitable for productive agricultural activities.

The Project forms part of Albania's renewable energy transition and contributes to national and international decarbonisation objectives through the generation of clean electricity.

2.2. Project Components

The Blue 3 PV Project comprises the following principal components:

2.2.1. Photovoltaic Array

The main Project component consists of photovoltaic solar modules mounted on support structures across the Project site. The solar field will occupy the majority of the leased land area and will include internal access routes and maintenance corridors.

2.2.2. Inverters and Electrical Equipment

The Project will include inverter stations and associated electrical equipment required to convert direct current (DC) electricity generated by the solar panels into alternating current (AC) suitable for grid connection.

2.2.3. Monitoring and Control Systems

A central monitoring and control system will be installed to manage plant performance, operational efficiency, and maintenance activities. This infrastructure will be located within the Project footprint.

2.2.4. Transformer Substation

The Project includes a transformer substation required for voltage transformation and connection of the generated electricity to the national transmission system. The substation will be located within the Project development area.

2.2.5. Internal Access Roads

Internal roads will be constructed to provide access to solar arrays, inverter stations, and electrical facilities during construction, operation, and maintenance phases. Wherever possible, existing access routes will be utilised and upgraded.

2.2.6. Underground Transmission Line

An underground transmission cable will connect the Blue 3 PV Plant to the existing Blue 2 Park substation. The cable route extends beyond the main Project footprint and will require a linear corridor for installation and future maintenance access.

2.3. Purpose of the LALRP

The purpose of this Land Acquisition and Livelihood Restoration Plan (LALRP) is to establish the principles, procedures, and mitigation measures for managing land acquisition, land use restrictions, and livelihood impacts associated with the Blue 3 Photovoltaic Project.

The LALRP has been prepared to ensure that Project-related land requirements are managed in accordance with the EBRD Environmental and Social Policy (2024), specifically ESR 1 (Assessment and Management of Environmental and Social Risks and Impacts), ESR 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), and ESR 10 (Stakeholder Engagement), as well as applicable Albanian legislation.

While this LALRP has been developed primarily to meet the requirements of EBRD ESR 5, its implementation also supports compliance with ESR 1 and ESR 10. Where relevant, the Plan has considered interfaces with ESR 4 (Health, Safety and Security), ESR 6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources), and ESR 8 (Cultural Heritage), particularly in relation to access restrictions, community safety, ecosystem services, and protection of cultural resources.

The Plan aims to avoid or minimise physical and economic displacement, protect the rights and livelihoods of affected persons, ensure meaningful stakeholder engagement, and provide appropriate mitigation, compensation, and livelihood restoration measures where impacts cannot be avoided.

Although the Project is being developed on long-term leased land and no physical displacement is currently anticipated, this LALRP provides a framework for managing any impacts related to land occupation, temporary access restrictions, the underground transmission cable corridor, and potential effects on formal or informal land users. Where differences exist between national legislation and EBRD requirements, the Project will apply the higher standard in accordance with good international practice.

2.4. Scope of the Plan

This Land Acquisition and Livelihood Restoration Plan (LALRP) applies to all Project activities that may result in land-related impacts during the planning, construction, operation, maintenance, and decommissioning phases of the Blue 3 Photovoltaic Project.

The scope of the Plan covers:

2.4.1. Project Components

The LALRP applies to all Project facilities and associated infrastructure, including:

- The 58.5-hectare photovoltaic plant site;
- Solar panel arrays and associated mounting structures;
- Inverter stations and electrical equipment;
- Transformer substation;
- Internal access roads;
- Drainage infrastructure and ancillary facilities;
- Security fencing and operational facilities;
- Underground transmission cable connecting the Blue 3 PV Plant to the Blue 2 substation; and
- Temporary construction areas, including laydown areas, storage zones, contractor compounds, and temporary access routes.

2.4.2. Types of Land-Related Impacts

The Plan addresses:

- Permanent occupation of leased land required for Project infrastructure;
- Temporary land occupation during construction;
- Restrictions on access to land, assets, and natural resources;
- Potential impacts on formal and informal land users;
- Potential impacts on livestock grazing activities and access routes;
- Potential impacts on livelihoods resulting from temporary or permanent land-use restrictions;
- Potential impacts associated with easements or rights-of-way for the underground transmission cable; and
- Any unforeseen land acquisition or livelihood impacts identified during Project implementation.

2.4.3. Affected Persons and Stakeholders

The LALRP applies to all individuals, households, groups, and entities that may be affected directly or indirectly by Project-related land requirements, including:

- Landowners leasing land to the Project;
- Formal and informal land users;
- Adjacent landowners and land users;
- Livestock owners and herders using nearby areas;
- Local communities within the Project area of influence;
- Vulnerable individuals and households; and
- Relevant government authorities and institutions.

2.4.4. Geographic Scope

The geographic scope includes:

- The Blue 3 PV Project footprint;
- The underground cable corridor connecting Blue 3 to the Blue 2 substation;
- Temporary construction and access areas;
- Adjacent land potentially affected by construction activities or access restrictions; and
- Communities within the Project area of influence, particularly Topojë Administrative Unit and other settlements potentially affected by construction traffic and Project activities.

The Plan will remain applicable throughout the Project lifecycle and will be updated if Project design changes result in additional land requirements or impacts.

2.5. Methodology

The LALRP has been prepared using a combination of document review, field-based information, stakeholder engagement, and alignment with applicable national and international requirements.

The methodology comprised the following key steps:

2.5.1. Review of Project Design and Land Requirements

A review was undertaken of available Project documentation, including:

- Project description and technical design information;
- Site layout and infrastructure plans;
- Land lease documentation and available cadastral information;
- Environmental and Social Impact Assessment (ESIA) documentation; and
- Stakeholder Engagement Plan and related social baseline studies.

This review was used to identify Project land requirements, associated facilities, and potential land-related risks and impacts.

2.5.2. Legal and Policy Review

A review was conducted of:

- Albanian legislation governing land ownership, land use, leasing arrangements, property rights, compensation, expropriation, and public consultation;
- EBRD Environmental and Social Policy (2024);
- EBRD Environmental and Social Requirement (ESR) 1: Assessment and Management of Environmental and Social Risks and Impacts;
- EBRD Environmental and Social Requirement (ESR) 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; and
- EBRD Environmental and Social Requirement (ESR) 10: Stakeholder Engagement.

The review identified applicable requirements and informed the development of the LALRP framework.

2.5.3. Socio-Economic Baseline Assessment

Socio-economic baseline information was reviewed to understand existing conditions within the Project area of influence. The assessment considered:

- Population characteristics;
- Household composition;
- Livelihood activities and income sources;
- Land use patterns;
- Vulnerable groups;
- Community infrastructure; and
- Local economic conditions.

Particular attention was given to identifying groups that may be more vulnerable to Project-related impacts.

2.5.4. Stakeholder Engagement

Information gathered through stakeholder engagement activities was incorporated into the assessment process. Consultations with local authorities, community representatives, landowners, and other stakeholders were reviewed to:

- Understand existing land use practices;
- Identify potential concerns regarding land access and livelihoods;
- Verify information regarding land ownership and use; and
- Inform mitigation and monitoring measures.

2.5.5. Impact Identification and Assessment

Potential land acquisition, land-use restriction, and livelihood impacts were assessed using the mitigation hierarchy approach, with emphasis on:

- Avoidance of displacement and livelihood impacts;
- Minimisation of unavoidable impacts;
- Identification of mitigation measures;
- Restoration of livelihoods where required; and
- Monitoring of outcomes throughout Project implementation.

2.5.6. Gap Assessment and Management Measures

The Project's existing land arrangements and management approach were reviewed against EBRD requirements to identify any gaps. Where necessary, additional measures were developed to ensure alignment with EBRD standards and good international practice.

2.5.7. Plan Preparation

The findings of the baseline review, stakeholder engagement process, legal analysis, and impact assessment were integrated into this LALRP. The Plan establishes the procedures, responsibilities, mitigation measures, monitoring requirements, and grievance mechanisms that will be implemented to manage land acquisition and livelihood restoration issues throughout the Project lifecycle.

3. Legal and Policy Framework

3.1. Relevant National Laws on Land Use and Compensation

The Albanian legal framework governing land acquisition and resettlement is grounded in the Constitution of the Republic of Albania and supported by a series of laws, regulatory acts, and decisions of the Council of Ministers (DCMs).

Constitutional Basis - Article 41(4) of the Constitution stipulates that:

- “Expropriations or limitations of property rights equivalent to expropriation are permitted only against fair compensation.”
- This constitutional provision underpins the principle of lawful, fair, and compensated expropriation for public interest.
- Relevant Legislation and Regulatory Acts - Key laws and regulations governing land acquisition, property rights, and expropriation include:
- Constitutional Law No. 8752/2001 (amended), “On the Establishment and Functioning of Land Administration and Protection Structures”;
- Law No. 7850, dated 29.07.1994, “Civil Code of the Republic of Albania” (amended), which governs ownership rights, easements (servitudes), usufruct, leasehold rights, and related property matters;
- Law No. 111, dated 07.02.2019, “On Registration of Immovable Properties”, which regulates the organization and functioning of the Albanian Cadastral Agency (ACA) and establishes the legal framework for immovable property registration and administration;
- Law No. 8561, dated 22.12.1999, “On Expropriation and Temporary Use of Private Property for Public Interest” (amended), which governs the procedures for permanent expropriation and temporary possession of private property for public needs;
- Decision of the Council of Ministers (DCM) No. 89, dated 03.02.2016, “On Reference Value of Immovable Property”, which sets the valuation standards and reference prices for compensation purposes.

Overview of Key Legal Instruments

- The Constitution establishes fundamental principles, rights, freedoms, and the hierarchy of laws in Albania.
- The Civil Code defines property rights and the modalities for acquisition, use, and transfer of immovable property.
- The Law on Registration of Immovable Properties governs cadastral registration procedures and secures property rights while enabling the state’s right to expropriate or temporarily use property for public purposes.
- The Expropriation Law (No. 8561/1999) defines the rights and obligations of public authorities and property owners during expropriation and temporary use processes, including mechanisms for challenging valuations and decisions.

International Law and Priority of Application

- Article 122(2) of the Constitution establishes that international agreements ratified by law take precedence over national legislation in case of conflict.

- The European Convention on Human Rights, Protocol 1, Article 1, guarantees the right to peaceful enjoyment of possessions and sets conditions under which deprivation of property is permissible in the public interest, consistent with law and international principles.
- Recent Amendments and Institutional Arrangements - The current expropriation law, Law No. 8561/1999, was recently amended by Law No. 11/2020, which entered into force on 25 March 2020.

Key amendments include:

- Explicit recognition of the right to determine compensation based on international agreements ratified by Albania, particularly relevant for projects financed by international partners such as the World Bank.
- Establishment of the State Agency for Expropriations (SAE) under the Ministry of Infrastructure and Energy (MoIE), tasked with:
- Planning and managing expropriation requests;
- Calculating compensation values;
- Supervising expropriation procedures;
- Maintaining a comprehensive expropriation database;
- Negotiating compensation and payment schedules with Project-affected parties, following Council of Ministers regulations.

Expropriation requests are now submitted directly to the SAE rather than to ministries. The Minister responsible for urban development (currently the Minister of Infrastructure and Energy) submits requests for approval to the Council of Ministers.

DCM No. 395, dated 13.05.2020, regulates the organization and functioning of the State Agency for Expropriations.

Expropriation Procedures (Summary of Law No. 8561 and Amendments):

- Expropriation may be undertaken for national or local projects serving the public interest, including environmental protection, health, culture, education, and infrastructure development (Article 8/ç).
- The Municipality is the beneficiary subject initiating expropriation requests (Article 9).
- The Municipality submits requests, with necessary documentation, to the SAE.
- SAE publishes the expropriation request, collects claims from Project-affected owners, and prepares draft legislation for Council of Ministers' approval.
- Expropriation is finalized when owners voluntarily approve the property transfer.
- If owners disagree, the Council of Ministers approves expropriation decisions, which become immediately enforceable and are published officially.
- Owners have the right to appeal compensation or expropriation decisions to the courts. Failure to appeal renders the Council of Ministers' decision an enforceable title.

Additional Legal Considerations - Property Devaluation Compensation:

- Owners affected by partial expropriation may be entitled to compensation for property depreciation even if the property is not fully expropriated. This is regulated under Article 18 of Law No. 8561, subject to Council of Ministers guidelines.

Provisional Possession (Temporary Use):

- Temporary use of private land for public interests such as facilitating project construction—is permitted with compensation paid to owners. Such use requires a formal request to SAE, including description, duration, and compensation details. Owners may challenge the decision in court.

Property Valuation Criteria (DCM No. 138, dated 23.03.2000):

- Urban Land: Valuation based on Council of Ministers-approved prices in line with Law No. 133/2015 on property treatment and compensation finalization.
- Residential Properties: Compensation based on average sales prices recorded by the State Cadastre Agency.
- Industrial and Agricultural Properties: Compensation based on average sales prices registered by the Ministry of Infrastructure and Energy/SAE, adjusted for depreciation.
- Agricultural Land, Forests, Pastures: Valued per Council of Ministers' approved prices or State Cadastre average sales prices if unavailable.
- Fruit Trees: Valued based on investment costs, expenses, and amortization per unit or land surface, as per Ministry of Agriculture directives.
- Crops: Valued on expected yield multiplied by market price.
- Informal/Illegal Constructions: Expropriation may proceed if owners have initiated legalization procedures under Law No. 9482/2006 and related Council of Ministers decisions.

This legal framework ensures that land acquisition and resettlement are conducted transparently, fairly, and in line with national and international standards, safeguarding the rights of all Project-affected persons.

EU and International Conventions and Agreements

Albania became the 35th Member State of the Council of Europe on 13 July 1995. As a member, Albania has ratified approximately 25 conventions and is committed to adhering to the principles and obligations established therein. Key areas of commitment include:

- Prevention of torture;
- Combating racism;
- Protection of social rights;
- Safeguarding Minority Rights;
- Anti-corruption measures;
- Combating money laundering;
- Convention on the Prevention of Torture (COP198);
- Promotion of democracy and rule of law;
- Combating human trafficking;
- Protection of property rights;
- Strengthening judicial independence and fairness.

EU Land Policy Guidelines

The EU Land Policy provides comprehensive guidelines to support donor interventions in land policy and administration, primarily targeting both generalist and specialist staff engaged in land-related activities at field and headquarters levels.

Land policy is fundamental to addressing economic, social, and environmental challenges worldwide. The equitable distribution of property rights profoundly influences productivity, social justice, and conflict prevention. Issues such as inequitable land distribution, insecure tenure, and weak land administration systems can undermine social stability and development outcomes. Legislative and administrative reforms affecting property rights have long-term implications for political, economic, and social progress. Moreover, land policy plays a critical role in promoting environmental sustainability through encouraging responsible land use and management.

Implementation of EU Land Policy in Albania

Albania's institutional framework for property administration has evolved to include multiple agencies with political, administrative, and technical responsibilities. Historically, coordination challenges and overlapping mandates limited institutional effectiveness. Recent reforms have consolidated many functions under the State Cadastre Agency, improving coherence.

The Albanian Constitution, aligned with the European Convention on Human Rights and its Protocols, enshrines the right to property protection. The Government is actively pursuing an Integrated Land Management System reform aimed at strengthening property rights, improving land governance, and facilitating a dynamic land market.

This reform is prioritized within Albania's National Strategy for Development and Integration 2015-2020, emphasizing sustainable land use to foster economic growth and social well-being. The Integrated Land Management Reform is designed to accelerate national development by enhancing transparency and efficiency in land-related services, with significant social, economic, and environmental benefits.

Key components of the Integrated Land Management Plan aligned with EU Land Policy include:

- Development of a cohesive national land policy framework, incorporating sub-sector policies for forestry, tourism, real estate, and agriculture.
- Institutional reforms to reduce fragmentation, clarify mandates, and enhance efficiency across land-related agencies.
- Establishment of a harmonized legal and regulatory framework supporting land tenure security and administration.
- Implementation of comprehensive capacity-building initiatives throughout the land sector.

3.2. EBRD Requirements

EBRD Environmental and Social Policy (2024)

The European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2024) establishes the environmental and social requirements applicable to projects financed by the Bank. The Policy requires clients to identify, assess, manage, monitor, and report environmental and social risks and impacts throughout the project lifecycle.

The Policy promotes the application of good international practice and seeks to ensure that projects are designed and implemented in a manner that avoids, minimises, and mitigates adverse impacts while enhancing environmental and social benefits. Compliance with the Environmental and Social Requirements (ESRs) is a condition of EBRD financing.

For the Blue 3 Photovoltaic Project, the most relevant requirements for land acquisition and livelihood restoration are ESR 1 (Assessment and Management of Environmental and Social Risks and Impacts), ESR 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), and ESR 10 (Stakeholder Engagement).

Environmental and Social Requirement 1 (ESR 1): Assessment and Management of Environmental and Social Risks and Impacts

ESR 1 requires clients to establish a systematic process for identifying, assessing, managing, monitoring, and reporting environmental and social risks and impacts associated with a project.

Key ESR 1 requirements relevant to this LALRP include:

- Identification and assessment of land acquisition and livelihood-related risks and impacts;
- Collection and use of current environmental and social baseline information;
- Assessment of direct, indirect, and cumulative impacts;
- Application of the mitigation hierarchy (avoid, minimise, mitigate, and compensate);
- Identification of vulnerable individuals and groups who may be disproportionately affected;
- Development and implementation of management plans proportionate to project risks;
- Monitoring and reporting of environmental and social performance throughout the project lifecycle; and
- Integration of stakeholder engagement into the assessment and management process.

ESR 1 also requires projects to assess alternatives during project planning to avoid or minimise displacement and other adverse impacts wherever feasible.

Environmental and Social Requirement 5 (ESR 5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESR 5 establishes the requirements for managing impacts associated with land acquisition, restrictions on land use, physical displacement, and economic displacement.

The objectives of ESR 5 are to:

- Avoid involuntary resettlement wherever possible;
- Minimise displacement through alternative project designs and site selection;
- Avoid forced eviction;
- Mitigate adverse social and economic impacts arising from land acquisition or restrictions on land use;
- Restore or improve livelihoods and standards of living of affected persons;
- Ensure meaningful consultation and participation of affected persons;
- Provide access to grievance mechanisms; and
- Enable affected persons to benefit from project opportunities where feasible.

Under ESR 5, the Project must:

- Identify all persons affected by land acquisition or land-use restrictions;
- Assess physical and economic displacement risks;
- Characterise baseline socio-economic conditions of affected persons;
- Identify formal and informal land users;
- Avoid or minimise livelihood impacts;
- Provide compensation for affected assets at replacement cost where applicable;

- Restore livelihoods where income sources or access to resources are affected;
- Pay particular attention to vulnerable groups;
- Monitor the effectiveness of compensation and livelihood restoration measures; and
- Maintain appropriate documentation of land transactions and stakeholder engagement.

ESR 5 applies not only to permanent land acquisition but also to temporary land occupation, easements, access restrictions, and other project-related limitations on the use of land and natural resources.

Environmental and Social Requirement 10 (ESR 10): Stakeholder Engagement

ESR 10 recognises stakeholder engagement as a fundamental component of environmental and social risk management.

The objectives of ESR 10 are to:

- Establish a systematic approach to stakeholder engagement;
- Ensure meaningful and inclusive consultation throughout the project lifecycle;
- Promote transparent disclosure of project information;
- Facilitate participation of affected communities and vulnerable groups;
- Provide effective grievance mechanisms; and
- Maintain constructive relationships with project stakeholders.

For land acquisition and livelihood restoration activities, ESR 10 requires:

- Early identification of affected stakeholders;
- Identification of vulnerable and disadvantaged groups;
- Provision of accessible and understandable project information;
- Meaningful consultation before decisions affecting land and livelihoods are implemented;
- Documentation of stakeholder concerns and responses;
- Establishment of a grievance mechanism that is free, accessible, and responsive; and
- Ongoing engagement throughout project implementation and monitoring.

3.3. Implications for the Blue 3 Photovoltaic Project

In accordance with EBRD requirements, the Project has adopted a site selection approach that prioritised degraded land with limited productive use and avoided densely populated areas, productive agricultural land, protected areas, and critical habitats. The Project currently relies on long-term lease agreements rather than expropriation and is not expected to result in physical displacement.

Nevertheless, this LALRP has been prepared to ensure that any actual or potential impacts associated with land occupation, temporary access restrictions, cable installation activities, informal land use, grazing activities, or unforeseen livelihood impacts are identified, managed, and monitored in accordance with ESR 1, ESR 5, and ESR 10 requirements throughout the Project lifecycle.

3.4. Gap Analysis

The Blue 3 Photovoltaic Project has been assessed against the requirements of Albanian legislation governing land acquisition, property rights, compensation, and stakeholder engagement, as well as the

requirements of the EBRD Environmental and Social Policy (2024), particularly ESR 1, ESR 5, and ESR 10.

The analysis identifies areas where national legislation is generally aligned with EBRD requirements and areas where additional Project-specific measures are required to achieve compliance with lender standards. In cases where differences exist, the Project will apply the more stringent requirement.

Table 1 Gap Analysis: Albanian Legislation versus EBRD Requirements

Topic	Albanian Legislation	EBRD Requirements (ESR 1, ESR 5, ESR 10)	Project Commitment
Avoidance and minimisation of displacement	Expropriation is permitted for public interest purposes and compensation is required. Limited emphasis on avoidance through project design.	Projects must avoid physical and economic displacement wherever feasible and minimise impacts through alternative designs and site selection.	The Project has been located on degraded, saline land with limited productive use and has avoided residential areas, productive agricultural land, and sensitive receptors. Any additional land requirements will be screened to avoid displacement.
Coverage of economic displacement	Focuses primarily on compensation for legal property rights and expropriated assets.	Covers both physical displacement and economic displacement resulting from land acquisition, temporary occupation, easements, or restrictions on land use.	The Project will assess and manage impacts on formal and informal land users, grazing activities, access restrictions, and livelihood impacts, regardless of legal ownership status.
Informal land users	Limited recognition of informal users unless protected through specific legal procedures.	Requires identification and consideration of informal occupants, users, tenants, sharecroppers, and users of common resources.	Prior to construction, the Project will verify the presence of any informal users and implement appropriate mitigation measures where impacts are identified.
Compensation basis	Compensation is generally based on official valuation methods and reference values established by the Council of Ministers.	Compensation must be provided at full replacement cost, including transaction costs and restoration of lost assets.	Where compensation is required, the Project will ensure that compensation is sufficient to meet replacement cost principles consistent with ESR 5.
Livelihood restoration	No explicit requirement for livelihood restoration beyond compensation for acquired assets.	Requires restoration or improvement of livelihoods and living standards for economically displaced persons.	If livelihood impacts occur, the Project will develop and implement livelihood restoration measures proportionate to the nature and scale of impacts.
Temporary land occupation	Temporary use of private land is permitted with compensation to owners.	Temporary occupation that causes economic impacts or access restrictions must be assessed, mitigated, and compensated where necessary.	Temporary construction areas and cable installation activities will be managed to minimise disruption and restore land after use.
Vulnerable groups	No specific requirement for identification or targeted support of vulnerable persons during land acquisition processes.	Requires identification of vulnerable groups and implementation of measures to ensure they are not disproportionately affected.	The Project will identify vulnerable households and provide tailored engagement and support where required.
Stakeholder engagement	Public consultation is required through permitting and administrative procedures.	Requires ongoing, meaningful, inclusive, and documented stakeholder engagement throughout the project lifecycle.	Stakeholder engagement will continue throughout construction and operation in accordance with the Stakeholder Engagement Plan (SEP).
Information disclosure	Disclosure requirements are linked to administrative	Requires timely, accessible, understandable, and culturally appropriate	The Project will disclose relevant information through stakeholder engagement activities and

Topic	Albanian Legislation	EBRD Requirements (ESR 1, ESR 5, ESR 10)	Project Commitment
	procedures and legal notifications.	disclosure of project information.	maintain transparent communication channels.
Grievance mechanism	Affected persons may challenge expropriation decisions and compensation through administrative and judicial processes.	Requires a project-level grievance mechanism that is accessible, transparent, free of retaliation, and responsive.	The Project will maintain a grievance mechanism available to all stakeholders throughout the Project lifecycle.
Monitoring and reporting	Limited requirements for monitoring livelihood outcomes after compensation is paid.	Requires monitoring of land acquisition, compensation, livelihood restoration, and stakeholder engagement outcomes.	The Project will monitor implementation of this LALRP and report on land-related performance as part of the Environmental and Social Management System (ESMS).
Voluntary land transactions	Recognised through civil and contractual law.	Requires verification that transactions are voluntary, free of coercion, and do not adversely affect third parties.	The Project will maintain records demonstrating that lease agreements were entered into voluntarily and that no third-party impacts remain unaddressed.

3.4.1. Conclusion of Gap Analysis

The review indicates that Albanian legislation provides a strong legal basis for property rights protection, compensation, expropriation procedures, and judicial remedies. However, EBRD requirements extend beyond legal compliance by requiring livelihood restoration, consideration of informal land users, identification of vulnerable groups, continuous stakeholder engagement, project-level grievance mechanisms, and monitoring of outcomes.

To bridge these gaps, the Blue 3 Photovoltaic Project commits to implementing this LALRP in accordance with EBRD ESR 1, ESR 5, and ESR 10. Where differences exist between national legislation and EBRD requirements, the Project will apply the higher standard to ensure compliance with lender requirements and good international practice.

4. Project Land Requirements

4.1. Site Description

The Blue 3 Photovoltaic (PV) Project is located within the Municipality of Fier in southwestern Albania, approximately 120 km southwest of Tirana. The Project is situated in the Sheq Marinas–Topojë area, one of the regions with the highest solar irradiation potential in the country, making it well suited for utility-scale solar energy generation. The Project site lies approximately between 40°N latitude and 19°E longitude and is located about 2.4–2.7 km east of the Adriatic coastline.

The Project occupies approximately 58.5 hectares of land and is located within the administrative territory of Fier Municipality, near the Sheq Marinas Administrative Unit. The nearest settlements include Sheq Marinas, Topojë, Grykë, Fushë, and Darëzezë e Re. The closest settlements are Sheq Marinas (approximately 3.4 km), Grykë (approximately 3.2 km), and Topojë (approximately 4 km) from the Project site. As a result, no residential areas are located within the Project footprint.

The Project area is situated within a lowland coastal plain characterised by flat terrain with elevations generally ranging from 0 to 100 metres above sea level. The wider landscape includes the Seman River delta, coastal dunes, sandy beaches, marshlands, and agricultural areas. The site itself is predominantly composed of marshy and saline soils with poor agricultural productivity. Existing drainage channels traverse portions of the site and have influenced the final Project layout. These drainage features will be maintained and incorporated into the site design where required.

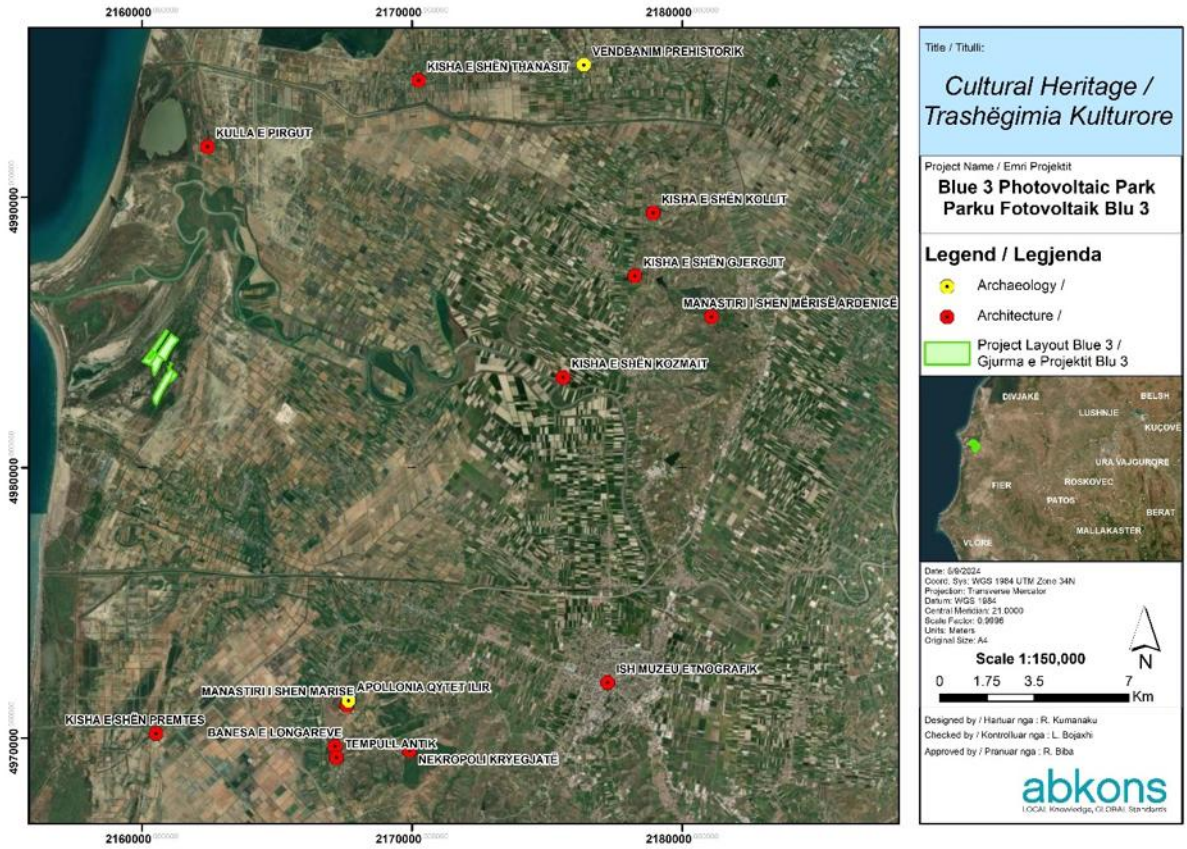
The Project site is bounded by several notable natural and infrastructure features:

- To the north, the Seman River is located approximately 2 km from the site;
- To the west, the Adriatic Sea and Seman Beach are located approximately 2 km away;
- To the east, the Trans Adriatic Pipeline (TAP) gas infrastructure is situated approximately 3.2 km from the site; and
- To the south, the village of Grykë is located approximately 3.2 km away.

From an environmental perspective, the Project is located outside legally protected areas and critical habitats. The nearest protected areas are the Vjosa–Narta Protected Landscape, located approximately 23.3 km to the north, and Divjakë–Karavasta National Park, located approximately 9.5 km to the south. The site selection process intentionally prioritised degraded and low-productivity land to minimise impacts on biodiversity, agricultural production, and existing land uses.

The land required for the Project has been secured through long-term lease agreements with landowners for a period of 49 years. Based on current information, the site is largely unused for productive purposes due to high salinity levels and poor soil quality. No residential structures, businesses, or productive agricultural activities have been identified within the Project footprint. Consequently, the risk of physical displacement is considered negligible, while the potential for economic displacement is limited and primarily associated with any temporary restrictions on land access during construction activities or installation of the underground transmission cable.

Overall, the site characteristics support the suitability of the location for solar energy development while minimising potential land acquisition, resettlement, and livelihood impacts.



4.2. Land Requirements

4.2.1. Permanent Land Requirement

The photovoltaic facility requires approximately 58.5 hectares of land for the solar arrays, inverter stations, transformer substation, internal roads, security infrastructure, drainage management, and associated facilities. The land has been secured through a long-term lease agreement with private landowners for a period of 49 years. No permanent land acquisition through expropriation is required.

4.2.2. Temporary Land Requirement

Temporary land occupation may be required during construction for:

- material storage areas;
- contractor compounds;
- temporary parking areas;
- equipment laydown areas;
- cable installation activities; and
- construction access and manoeuvring space.

Temporary use areas will be located within the leased Project boundary wherever feasible. Any additional temporary land requirements outside the leased area will be subject to voluntary agreements with affected landowners or users. Following construction, all temporarily occupied areas will be reinstated to their pre-construction condition. Consistent with EBRD ESR 5, temporary occupation that restricts access to land or resources will be assessed and managed to avoid or minimise economic displacement impacts.

4.2.3. Land Acquisition Context

The Project has been deliberately sited on degraded, saline land with limited productive value and outside protected areas, critical habitats, and densely populated settlements. Based on current Project information, no physical displacement of households, residences, or businesses is anticipated. The principal land-related risks are associated with temporary construction impacts, access restrictions, and any potential effects on informal land users or livestock grazing activities in the vicinity of the Project and cable route. These aspects will be verified through land due diligence and stakeholder engagement during Project implementation.

Detailed engineering design is ongoing; therefore, the exact footprint of some components will be confirmed during the final design stage.

Table 2 Land requirement for each component of the project

Project Component	Land Requirement	Type of Land Requirement
Photovoltaic (PV) Arrays	Approximately 50–55 ha (majority of the site)	Permanent
Inverter Stations	Localized footprints within the PV field (typically <0.5 ha total)	Permanent
Transformer Substation	Approximately 0.5–1.0 ha (to be confirmed)	Permanent
Internal Access Roads	Integrated within the 58.5 ha site footprint	Permanent
Drainage Channels and Setback Areas	Existing drainage corridors retained within site layout	Permanent
Monitoring and Control Facilities	Small footprint within operational compound	Permanent
Security Infrastructure (fencing, gates, CCTV)	Along site perimeter	Permanent
Underground Transmission Cable to Blue 2 Substation	Linear easement/corridor; final length and width to be confirmed	Permanent easement and temporary construction corridor
Construction Compound and Laydown Areas	Temporary use during construction; preferably within leased site	Temporary
Material Storage Areas	Temporary use during construction	Temporary
Contractor Parking and Equipment Areas	Temporary use during construction	Temporary

Photovoltaic Arrays

The photovoltaic field constitutes the principal Project component and occupies most of the 58.5-hectare Project area. Solar panels will be mounted on support structures arranged in rows, with spacing maintained for maintenance access, drainage management, and operational safety.

Inverter Stations

Multiple inverter units will be distributed throughout the solar field to convert direct current generated by the solar panels into alternating current. These facilities require only small localized footprints and are generally installed within the PV array area.

Transformer Substation

A transformer substation will be constructed within the Project boundary to facilitate grid connection and power export. The facility will require a dedicated fenced area, although the exact footprint will be determined during detailed engineering design.

Internal Access Roads

Internal access roads will provide access to solar arrays, inverter stations, and electrical infrastructure during construction and operation. These roads are incorporated within the overall leased area and do not require additional off-site land acquisition.

Underground Transmission Cable

Electricity generated by the Project will be transmitted through an underground cable connecting Blue 3 to the existing Blue 2 substation. The cable will require a temporary construction corridor during installation and may require a permanent easement or right-of-way to ensure future maintenance access. Following installation, the surface will be reinstated.

Temporary Construction Areas

Construction activities may require temporary areas for contractor compounds, equipment storage, vehicle parking, and material laydown. Wherever feasible, these facilities will be located within the leased Project boundary to avoid additional land requirements and minimise impacts on neighbouring landowners and land users. Temporary areas will be restored upon completion of construction works. Consistent with EBRD ESR 5, any temporary land occupation that restricts access or affects land use will be assessed and managed appropriately.

5. Land Tenure and Acquisition Strategy

5.1. Private Land

The land required for the Blue 3 Photovoltaic Project has been secured through voluntary long-term lease agreements concluded between SPV Blue 3 Sh.p.k. and the respective private landowners. The Project does not involve expropriation, compulsory acquisition, or involuntary land taking. Land access has been obtained through negotiated agreements based on the willing lessor–willing lessee principle.

Table 3 Private Land Parcels Affected by the Blue 3 Photovoltaic Project

Land Plot	Cadastral Zone	Ownership Category	Total Parcel Area (m²)	Total Parcel Area (ha)	Location
11/2	3358	Private	66,878	6.69	Sheq Marinas, Fier
102	3358	Private	164,685	16.47	Sheq Marinas, Fier
104	3358	Private	24,100	2.41	Sheq Marinas, Fier
107	3358	Private	92,876	9.29	Sheq Marinas, Fier
108	3358	Private	65,515	6.55	Sheq Marinas, Fier
109	3358	Private	10,800	1.08	Sheq Marinas, Fier
134/1	3358	Private	167,646	16.76	Sheq Marinas, Fier
Total			592,500	59.25	

Notes:

- All affected land parcels are located within Cadastral Zone 3358, Sheq Marinas, Fier Municipality.
- The affected parcels are under private ownership and have been secured through voluntary lease agreements.
- The total affected land area is approximately **592,500 m² (59.25 ha)**.
- No expropriation or compulsory land acquisition has been undertaken for the Project.
- Ownership verification was completed through review of cadastral and property registration records prior to execution of lease agreements.

5.1.1. Voluntary Lease Agreements

The Project footprint, covering approximately 58.5 hectares, is located on privately owned land. Access to the land has been obtained through voluntary lease agreements entered into through direct negotiations with landowners. The agreements were concluded without the use of expropriation powers, coercion, pressure, or threat of compulsory acquisition.

The lease arrangements provide the Project with legal rights to occupy and use the land for the construction, operation, maintenance, and eventual decommissioning of the photovoltaic facility.

Lease Duration

On 10 June 2025, long-term lease agreements were concluded with the affected landowners for a period of 49 years. The agreements grant the Project secure land use rights for the duration of the lease while retaining legal ownership of the land with the respective landowners.

Rental Determination Methodology

Lease rates were negotiated directly between the Project developer and individual landowners through a market-based process. Rental values were established taking into consideration:

- Local land market conditions;
- Land characteristics and productive value;
- Long-term land use requirements of the Project;
- Comparable land lease arrangements in the area, where available; and
- Mutual agreement between the parties.

The negotiated rental payments were formalised through legally binding lease agreements.

Evidence of the Willing Lessor Principle

The Project applies the principle of voluntary land transactions consistent with EBRD ESR 5. Evidence supporting the willing lessor–willing lessee approach includes:

- Voluntary participation of landowners in negotiations;
- Absence of expropriation or compulsory acquisition procedures;
- Signed lease agreements executed by legally recognised landowners;
- Opportunity for landowners to review and negotiate lease terms;
- Documentation demonstrating mutual agreement on lease conditions and compensation arrangements; and
- No evidence of coercion, intimidation, or undue influence during negotiations.

The Project has verified that landowners had the right to decline participation and that lease agreements were entered into freely and voluntarily.

Due Diligence Process

A land due diligence process was undertaken prior to execution of the lease agreements to confirm legal ownership, identify potential encumbrances, and assess any land-related risks.

The due diligence process included:

- Review of cadastral records and property registration documents;
- Verification of ownership status;
- Identification of co-owners and inheritance-related issues, where applicable;
- Verification of property boundaries;
- Review of any registered encumbrances, mortgages, easements, or legal disputes; and
- Assessment of existing land use and potential third-party interests.

Where required, additional clarification was obtained from landowners and relevant public authorities.

Documentation

The Project maintains a comprehensive land documentation system, including:

- Land ownership documentation;
- Property registration certificates;

- Cadastral maps and parcel information;
- Lease agreements;
- Negotiation records;
- Payment records;
- Stakeholder engagement records (census form signed); and
- Grievance records related to land matters, if any.

All documentation is retained in accordance with Project document management procedures and applicable legal requirements.

Ownership Verification

Ownership verification was conducted through review of official property registration and cadastral records maintained by the competent authorities. Verification activities confirmed the legal ownership status of the leased parcels and ensured that lease agreements were executed by the rightful landowners or their legally authorised representatives.

Any discrepancies identified during the verification process were addressed prior to finalisation of lease agreements.

Lease Contracts

Lease agreements were formalised through written contracts signed by the respective parties. The contracts define:

- Identification of the leased parcel(s);
- Lease duration;
- Rights and obligations of the lessor and lessee;
- Rental payment arrangements;
- Conditions for access and use of the land;
- Provisions related to maintenance and restoration obligations; and
- Dispute resolution mechanisms.

The agreements provide the legal basis for the Project's long-term use of the land while preserving ownership rights.

Consultation Records

Engagement with landowners formed an integral part of the land acquisition process. Consultation activities were undertaken during the negotiation and lease agreement stages to ensure that landowners were informed about:

- The nature and purpose of the Project;
- Expected land requirements;
- Lease conditions and payment arrangements;
- Project implementation schedule;
- Available grievance mechanisms; and
- Contact points for further information.

Records of meetings, discussions, correspondence, and stakeholder engagement activities have been maintained by the Project and form part of the land acquisition documentation. Ongoing engagement with landowners will continue throughout the Project lifecycle in accordance with the Stakeholder Engagement Plan and EBRD ESR 10 requirements.

5.2. Public Land

In addition to the privately leased land required for the photovoltaic plant, the Project may utilise existing public infrastructure corridors, including irrigation canals, drainage channels, and public access roads, for construction access and installation of associated infrastructure. These areas are publicly owned and managed by the relevant governmental authorities and do not require permanent acquisition by the Project.

Land Ownership Authority

Public land and infrastructure potentially affected by the Project, including irrigation and drainage networks and public roads, fall under the ownership and management of competent public authorities. Depending on the asset type, responsibility may rest with the Municipality of Fier, the relevant water management authority, regional drainage boards, or other state institutions responsible for public infrastructure and land administration.

The Project has identified these public assets during the design process to ensure that existing public services and access arrangements are maintained throughout Project implementation.

Access Procedure

Where temporary access, crossing rights, or use of public land is required, the Project will obtain the necessary permits, approvals, authorisations, or access agreements from the competent authorities before commencing construction activities.

The use of public roads for transportation of materials and equipment, and any crossings of irrigation or drainage infrastructure, will be undertaken in accordance with applicable national legislation and permit requirements.

No permanent occupation of public land is currently anticipated beyond any approved utility crossings or rights-of-way required for Project infrastructure.

Government Approvals

The Project will obtain all required approvals, permits, and authorisations associated with the use of public land and infrastructure prior to construction. These may include:

- Municipal approvals for use of public roads and access routes;
- Permissions for crossings of irrigation and drainage canals;
- Approvals for installation of underground utilities within public corridors;
- Environmental and construction permits where required; and
- Any additional authorisations issued by national, regional, or local authorities.

The Project is committed to maintaining existing public access, avoiding disruption to irrigation and drainage functions, and restoring any affected public infrastructure to its original or equivalent condition following completion of construction activities.

5.3. Associated Facilities

In accordance with EBRD ESR 1 and ESR 5, associated facilities are facilities that are not funded as part of the Project but are directly and significantly related to the Project and necessary for its operation. For the Blue 3 Photovoltaic Project, the associated facilities include the underground transmission cable, access

roads, and grid connection infrastructure required to transmit electricity from the Project to the national electricity network.

Underground Transmission Line

The Blue 3 PV Plant will be connected to the existing Blue 2 substation through an underground transmission cable. The cable is an integral component of the Project as it enables the export of electricity generated by the photovoltaic facility.

The cable will be installed within a designated utility corridor and may require temporary access to land during construction. Following installation, the surface will be reinstated and long-term impacts on land use are expected to be limited. Any easements, access rights, or land use restrictions associated with the cable route will be managed in accordance with the principles established in this LALRP.

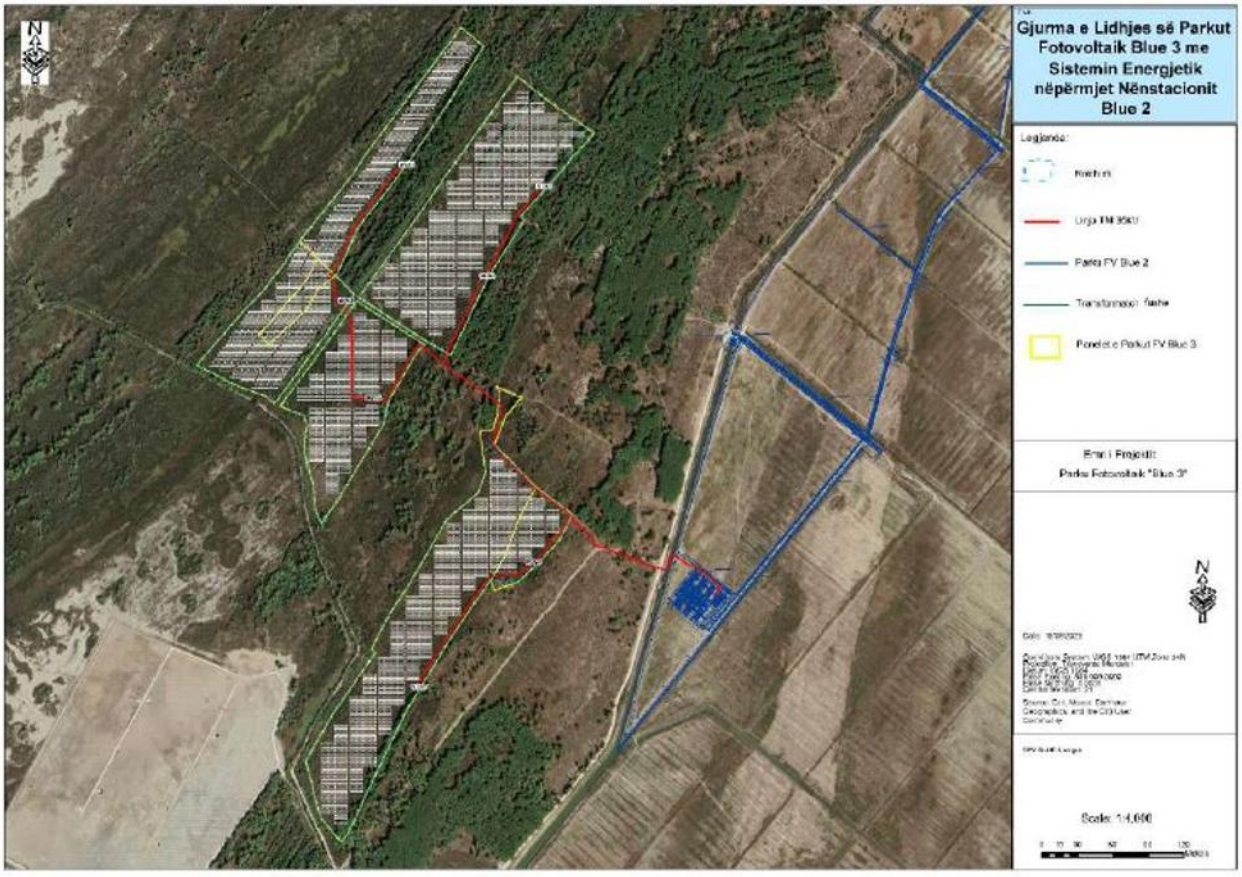


Figure 1 Underground Grid Connection Cable from the Blue 3 Photovoltaic Project to the Existing Blue 2 Substation

Access Roads

The Project will utilise existing public and local access roads to provide access for construction vehicles, equipment transport, operation, and maintenance activities. Where necessary, existing roads may be upgraded or strengthened to accommodate Project traffic.

No permanent acquisition of public roads is anticipated. However, temporary impacts may occur during construction due to increased traffic volumes, transportation of oversized equipment, or temporary traffic management measures. The Project will coordinate with relevant authorities to maintain access for local communities and minimise disruption.

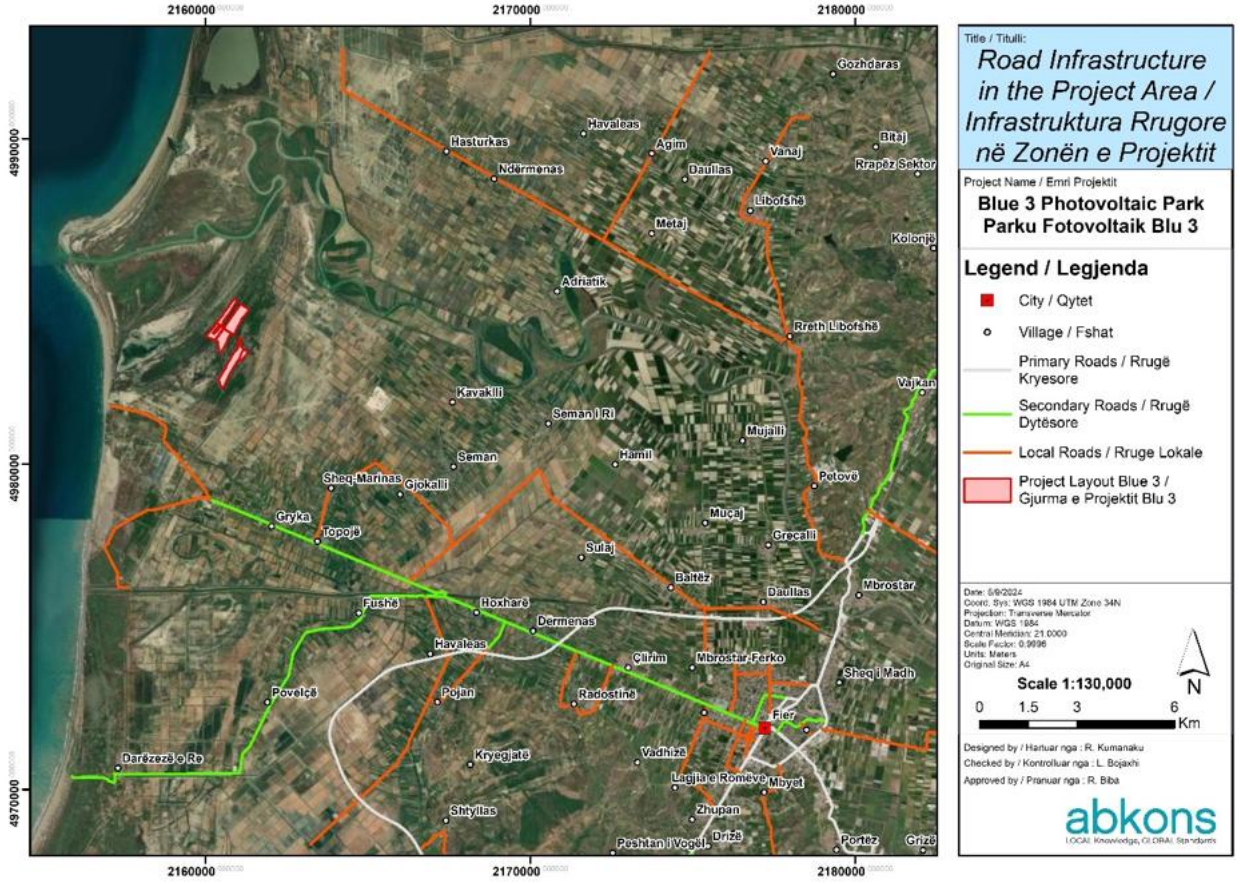


Figure 2 Road infrastructure in project area

Grid Connection Infrastructure

The Project's electricity output will be transmitted through the underground cable to the existing Blue 2 substation and subsequently into the national electricity grid. The grid connection infrastructure is essential for Project operation and is therefore considered an associated facility under EBRD requirements.

The Project does not anticipate the need for additional transmission corridors beyond those identified during the design phase. Any land requirements associated with grid connection infrastructure, including temporary construction access or utility easements, will be managed in accordance with the procedures outlined in this LALRP.

Land and Livelihood Considerations

Potential land-related impacts associated with the associated facilities are expected to be limited and primarily temporary in nature. These may include:

- Temporary occupation of land during cable installation;
- Temporary access restrictions along construction corridors;
- Disturbance associated with road upgrades or utility works; and
- Temporary disruption to agricultural or grazing activities, where applicable.

The Project will seek to avoid or minimise impacts through detailed design, stakeholder engagement, and implementation of appropriate mitigation measures. Any affected landowners, land users, or other stakeholders will be consulted and informed in accordance with the Stakeholder Engagement Plan and EBRD ESR 10 requirements.

6. Avoidance and Minimization Measures

In accordance with EBRD ESR 5, the Project has applied the mitigation hierarchy by prioritising the avoidance and minimisation of land acquisition, physical displacement, economic displacement, and livelihood impacts during site selection and Project design. The selection of the Blue 3 Photovoltaic Project site was informed by technical, environmental, social, and land-use considerations with the objective of reducing potential impacts on communities, productive land, and existing land users.

6.1. Avoidance of Settlements and Residential Areas

The Project has been located away from residential settlements and built-up areas. The nearest settlements, including Sheq Marinas, Topojë, Grykë, and Fushë, are situated several kilometres from the Project site. No residential dwellings, businesses, community facilities, or other structures requiring relocation have been identified within the Project footprint.

As a result of the site selection process:

- No physical displacement of households is required;
- No residential structures will be demolished or relocated;
- No community infrastructure will be removed or relocated; and
- No resettlement activities are anticipated.

The siting strategy has therefore effectively avoided involuntary physical displacement in accordance with ESR 5 requirements.

6.2. Avoidance of Productive Agricultural Land

The Project has been developed on land characterised by high salinity levels, marshy conditions, and limited agricultural productivity. Consultations with local stakeholders and baseline studies confirmed that the affected land has low economic value for agricultural production and has historically remained largely underutilised.

The site selection process specifically sought to avoid:

- High-value agricultural land;
- Intensively cultivated farmland;
- Areas supporting commercial agricultural production; and
- Land with significant livelihood dependence.

By locating the Project on degraded and low-productivity land, potential impacts on agricultural production and agricultural livelihoods have been substantially reduced.

6.3. Reduction of Impacts on Grazing Areas

During the environmental and social assessment process, consideration was given to existing land uses within and surrounding the Project area, including informal livestock grazing.

The Project footprint has been designed to minimise disruption to surrounding grazing activities through:

- Selection of land with limited current productive use;
- Retention of access routes where feasible;
- Avoidance of unnecessary occupation of adjacent land;

- Limiting temporary construction areas to the extent practicable; and
- Restoring temporarily affected areas following construction.

Although occasional livestock grazing may occur in the wider area, no significant dependence on the Project site for grazing livelihoods has been identified. Any temporary impacts on access during construction will be managed through stakeholder engagement and appropriate access arrangements.

6.4. Minimisation of Land Fragmentation

The Project design has sought to minimise fragmentation of existing landholdings and disruption to surrounding land uses.

- Key measures include:
- Consolidation of Project infrastructure within a contiguous development area;
- Utilisation of a limited number of leased parcels where possible;
- Alignment of Project boundaries with existing parcel configurations;
- Use of an underground transmission cable to reduce permanent land take and visual barriers; and
- Avoidance of unnecessary severance of agricultural or access routes.

The Project relies on long-term lease agreements rather than permanent acquisition, allowing ownership of the affected land to remain with the existing landowners. This approach further reduces potential impacts on land tenure arrangements and future land management options.

6.5. Consideration of Alternatives

Consistent with ESR 5 and ESR 1 requirements, alternatives were considered during Project planning and site selection. The selected site was determined to represent the most suitable option based on a combination of technical feasibility, solar resource availability, proximity to existing grid infrastructure, land availability, environmental sensitivity, and social considerations.

The site selection process prioritised:

- Avoidance of settlements and residential areas;
- Avoidance of protected areas and sensitive habitats;
- Avoidance of productive agricultural land;
- Use of degraded and low-productivity land;
- Reduction of potential livelihood impacts; and
- Minimisation of land acquisition and displacement risks.

As a result, the Project is not expected to cause physical displacement and only limited economic displacement risks have been identified, primarily associated with temporary construction activities and access restrictions, which will be managed through the measures outlined in this LALRP.

7. Socioeconomic Baseline

7.1. Methodology

The preparation of this LALRP was based on a review of Project land requirements, land tenure documentation, stakeholder engagement records, socio-economic baseline information, and consultations with relevant stakeholders. The methodology was designed to be proportionate to the scale and nature of the Project's land-related impacts, consistent with EBRD ESR 1, ESR 5, and ESR 10.

Household Surveys

A household census or socio-economic household survey was not undertaken as part of the LALRP preparation.

In accordance with EBRD ESR 5, household surveys are generally required where projects result in physical displacement, economic displacement, loss of residential land, loss of livelihoods, or significant restrictions on access to land and resources. For the Blue 3 Photovoltaic Project, the assessment confirmed that:

- No households reside within the Project footprint;
- No residential structures will be affected;
- No physical displacement or resettlement is anticipated;
- The Project has been developed on privately leased land characterised by degraded and saline conditions with limited productive use;
- No businesses, commercial activities, or livelihood-dependent households have been identified within the Project area; and
- No significant economic displacement impacts have been identified.

Furthermore, available socio-economic baseline information for Topojë Administrative Unit and the wider Project area was collected through review of the 2023 Population Census, municipal records, administrative data, and stakeholder consultations undertaken during the ESIA process. This information was considered sufficient to characterise local socio-economic conditions and identify potentially vulnerable groups.

Given the absence of displaced households or livelihood impacts requiring compensation or restoration measures, a household survey was not considered necessary or proportionate to the Project risk profile.

Landowner Interviews

Targeted engagement was undertaken with the affected landowner(s) during the negotiation and execution of voluntary lease agreements.

The discussions focused on:

- Land ownership verification;
- Existing land use practices;
- Lease conditions and duration;
- Rental arrangements;
- Potential concerns regarding Project development;
- Access requirements; and
- Available grievance mechanisms.

The landowner consultations formed part of the due diligence process used to confirm that the lease agreements were entered into voluntarily and without coercion, consistent with the willing lessor–willing lessee principle.

Community Consultations

Community consultations were undertaken as part of the broader Environmental and Social Impact Assessment (ESIA) and Stakeholder Engagement Plan (SEP) process.

Consultations involved local authorities, village representatives, community members, and other stakeholders from the Project area of influence, including Topojë and surrounding settlements.

The consultations sought information on:

- Existing land use patterns;
- Agricultural and grazing activities;
- Community concerns and expectations;
- Local infrastructure and access routes;
- Potential Project impacts; and
- Vulnerable groups and community priorities.

Feedback obtained during the consultation process confirmed the limited productive value of the Project site and did not identify any households, businesses, or community assets that would be physically displaced by the Project. The outcomes of these consultations were incorporated into the assessment of land-related risks and the development of mitigation measures presented in this LALRP.

The Project will continue stakeholder engagement throughout construction and operation in accordance with the Stakeholder Engagement Plan and EBRD ESR 10 requirements.

7.2. Socio-Economic Baseline

7.2.1. Overview

A comprehensive socio-economic baseline assessment has been undertaken as part of the Environmental and Social Impact Assessment (ESIA) for the Blue 3 Photovoltaic Project. The assessment included demographic characteristics, household structure, employment and income sources, land use, vulnerable groups, social infrastructure, community cohesion, local governance structures, and ecosystem services within the Project Area of Influence.

The detailed socio-economic baseline is presented in Chapter 7 of the ESIA and is incorporated into this LALRP by reference. The purpose of this chapter is therefore to summarize those socio-economic characteristics relevant to land acquisition, land use, and livelihood restoration.

7.2.2. Summary of Relevant Socio-Economic Conditions

The Project is located within Topojë Administrative Unit (AU), Fier Municipality. The surrounding communities are predominantly rural, with livelihoods largely linked to paid employment, self-employment, pensions, agriculture, and remittances.

Consultations undertaken during the ESIA confirmed that the land required for the Project consists of privately owned land secured through voluntary lease agreements and is characterised by low agricultural productivity, saline soils, and limited economic use. Local stakeholders indicated that poor soil quality,

inadequate irrigation infrastructure, and limited access have historically constrained agricultural activities within the Project area.

No households, residential structures, businesses, or community facilities are located within the Project footprint, and no physical displacement is required.

7.2.3. Vulnerable Groups

The ESIA identified several categories of vulnerable persons within the wider Administrative Unit, including households receiving social assistance, female-headed households, persons with disabilities, Roma communities, and other socially vulnerable individuals.

However, no vulnerable households or vulnerable land users were identified among the affected landowners or within the Project footprint during land ownership verification, stakeholder consultations, and field surveys. Consequently, no specific livelihood restoration measures are currently required for vulnerable Project-affected persons.

Nevertheless, the Project will continue to apply inclusive stakeholder engagement practices and will monitor any unforeseen impacts on vulnerable individuals throughout Project implementation.

7.2.4. Land Use and Livelihoods

The Project site comprises leased land that is currently uncultivated and considered non-productive. The site is not used for commercial agriculture, residential purposes, or business activities. No formal or informal economic activities were identified that would result in significant economic displacement.

Based on the findings of the ESIA and stakeholder consultations, the Project is not expected to adversely affect local livelihoods, agricultural production, grazing activities, access to natural resources, or community infrastructure.

7.2.5. Reference to ESIA

Further information on:

- Demographic characteristics;
- Household structure;
- Employment and income sources;
- Vulnerable groups;
- Social infrastructure;
- Governance structures;
- Community cohesion;
- Land use and resource use;
- Ecosystem services; and
- Local economic activities

is provided in the ESIA, Chapter 6.3: Socio-Economic Baseline.

8. Impact Assessment

8.1. Land Impacts

8.1.1. Permanent Occupation

The Blue 3 Photovoltaic Project requires the long-term occupation of approximately 59.25 ha of privately owned land secured through voluntary lease agreements. The land will be occupied by the photovoltaic arrays, inverter stations, electrical infrastructure, internal access roads, drainage features, and ancillary facilities.

The Project does not involve land expropriation, and ownership of the affected parcels will remain with the existing landowner. The leased land is characterised by saline and degraded soil conditions with limited productive agricultural value. No residential structures, commercial facilities, or community infrastructure are located within the Project footprint.

As a result, the permanent land occupation is considered to have a low significance impact on existing land use and livelihoods.

8.1.2. Temporary Occupation

Temporary land occupation may occur during construction activities, particularly for:

- Construction compounds and laydown areas;
- Material storage areas;
- Equipment and vehicle parking;
- Temporary access arrangements;
- Installation of underground cables and utility crossings; and
- Temporary works associated with road and drainage crossings.

Where feasible, temporary construction areas will be located within the leased Project footprint. Any temporary occupation outside the leased area will be subject to agreement with the relevant landowner or authority. All temporarily affected areas will be reinstated following completion of construction activities.

Temporary impacts are expected to be localised, reversible, and of short duration.

8.1.3. Access Restrictions

Temporary access restrictions may occur during construction due to:

- Movement of construction vehicles and machinery;
- Installation of underground infrastructure;
- Temporary traffic management measures;
- Construction safety requirements; and
- Restricted access within active work zones.

No permanent restrictions to public roads, community infrastructure, or public services are anticipated. Existing access routes to surrounding agricultural land and neighbouring properties will be maintained wherever possible. Any temporary disruptions will be communicated in advance through the stakeholder engagement process.

Overall, access-related impacts are expected to be minor and temporary.

8.2. Economic Displacement

8.2.1. Loss of Agricultural Production

The Project site is located on land characterised by high salinity and limited agricultural productivity. Baseline assessments and stakeholder consultations indicate that the affected land is largely underutilised and does not support significant agricultural production.

Consequently, the Project is not expected to result in substantial loss of agricultural income or production. No households have been identified as economically dependent on the affected land for their primary livelihood.

The significance of agricultural production impacts is therefore assessed as negligible to low.

8.2.2. Loss of Grazing Land

Occasional livestock grazing may occur within the wider Project area. However, no evidence was identified indicating that the Project site represents a critical grazing resource or that local households depend on the affected land as their primary grazing area.

The Project footprint represents a small proportion of the available open land in the surrounding area, and alternative grazing areas remain accessible. Potential impacts on grazing activities are therefore considered limited.

The significance of grazing impacts is assessed as low.

8.2.3. Loss of Access Routes

The Project may temporarily affect access routes during construction activities, particularly in relation to equipment transport and underground cable installation.

No permanent closure of public roads, agricultural access routes, or community pathways is anticipated. The Project will maintain access to neighbouring landholdings and public infrastructure wherever feasible and will implement traffic management measures where required.

The significance of access-related economic impacts is assessed as low and temporary.

8.2.4. Business Impacts

No commercial enterprises, industrial facilities, shops, tourism facilities, or other formal businesses have been identified within the Project footprint or associated facilities that would be displaced or experience loss of income as a result of Project implementation.

Accordingly, no direct business displacement impacts are anticipated.

8.2.5. Informal Land Users

The assessment did not identify any informal settlers, tenants, sharecroppers, seasonal users, or other informal land users occupying the Project site. Similarly, no informal structures or livelihood activities requiring relocation were observed within the Project footprint.

Nevertheless, prior to construction commencement, the Project will undertake a final verification of land use conditions to confirm the absence of informal users and to identify any unforeseen land-related impacts.

Based on current information, impacts on informal land users are assessed as negligible.

8.3. Cumulative Impacts

The cumulative impact assessment considered existing and reasonably foreseeable developments within the wider area that may interact with the Blue 3 Photovoltaic Project and contribute to cumulative land use or livelihood impacts.

8.3.1. Other Photovoltaic Projects

The Project forms part of a broader renewable energy development area within Fier Municipality, where several photovoltaic projects have been proposed or developed. While individual projects occupy relatively limited areas, the cumulative conversion of land to renewable energy infrastructure may reduce the availability of undeveloped land within the wider area.

However, the cumulative significance is moderated by the fact that the projects are generally located on low-productivity, saline, or degraded land with limited agricultural value.

8.3.2. Transmission Infrastructure

Existing and planned energy infrastructure, including substations, transmission corridors, and utility connections, may contribute to cumulative land-use changes within the region. The Blue 3 Project will utilise existing grid infrastructure where feasible, reducing the need for extensive new transmission corridors and limiting additional land requirements.

As a result, cumulative impacts associated with transmission infrastructure are expected to be limited.

8.3.3. Future Developments

Future renewable energy, infrastructure, industrial, and agricultural developments within the wider Fier region may contribute to cumulative pressures on land resources, access routes, and ecosystem services. Although individual developments may have limited impacts, their combined effect could increase competition for land and influence future land-use patterns.

At present, no cumulative impacts have been identified that would result in significant physical displacement, livelihood loss, or restrictions on access to resources when considered in combination with the Blue 3 Project.

Overall, cumulative land acquisition and livelihood impacts are assessed as low, provided future developments continue to apply good international practice and appropriate land management measures.

9. Eligibility and Entitlement Framework

The Eligibility and Entitlement Framework establishes the principles and measures that will be applied in the event that Project activities result in land acquisition, temporary land occupation, access restrictions, or livelihood impacts. The framework has been developed in accordance with EBRD ESR 5 and applicable Albanian legislation.

Eligibility for compensation, assistance, or livelihood restoration measures will be determined based on the nature and extent of Project-related impacts and the status of affected persons at the time impacts occur.

The Project currently anticipates limited land and livelihood impacts due to the use of voluntary lease agreements and the absence of physical displacement. Nevertheless, this framework has been established to address any actual or unforeseen impacts that may arise during Project implementation.

Table 4 Eligibility and Entitlement Matrix

Category of Affected Person	Type of Impact	Entitlement
Private Landowner (Lessor)	Long-term lease of land for Project activities	Lease payments in accordance with negotiated lease agreements; continued ownership of land; access to grievance mechanism.
Private Landowner	Temporary occupation of land outside agreed lease area	Compensation for temporary use, restoration of land to pre-project condition, and compensation for any demonstrable damages.
Private Landowner	Damage to land, property, crops, drainage systems, or infrastructure during construction	Repair, replacement, or compensation at replacement value for verified damages.
Agricultural Land User/Farmer	Temporary loss of crops or agricultural production due to construction activities	Compensation for verified crop losses and restoration of affected land following construction.
Agricultural Land User/Farmer	Temporary restriction of access to agricultural land	Maintenance of access where feasible, alternative access arrangements, and restoration of access following completion of works.
Livestock Owner/Grazing User	Temporary restriction of access to grazing areas	Alternative access arrangements where feasible, restoration of access after construction, and stakeholder engagement regarding construction schedules.
Formal Tenant or Leaseholder (if identified)	Temporary or permanent loss of land use rights	Assistance proportionate to the impact, including compensation for verified losses and restoration of access or livelihood activities, where applicable.
Informal Land User (if identified)	Loss of access to land or resources used prior to Project activities	Assistance to restore access or livelihoods, consistent with EBRD ESR 5 requirements and the nature of the impact.
Business Operator (if identified)	Temporary disruption of business activities due to Project construction	Measures to minimise disruption and compensation for demonstrable losses directly attributable to Project activities, where applicable.
Community Members	Temporary disruption of public access routes	Maintenance of access where feasible, advance notification of restrictions, traffic management measures, and restoration of access following construction.
Users of Irrigation or Drainage Infrastructure	Temporary disruption of irrigation, drainage, or water management systems	Restoration of affected infrastructure and maintenance of service continuity wherever practicable.
Vulnerable Individuals or Households	Project-related economic impacts affecting income, access, or livelihoods	Additional consultation, targeted assistance, monitoring, and support measures proportionate to identified needs and impacts.

Category of Affected Person	Type of Impact	Entitlement
Any Affected Person	Project-related concerns, complaints, or disputes	Access to the Project grievance mechanism at no cost and without retaliation.

9.1. Eligibility Cut-Off Date

Should any unforeseen land acquisition, temporary occupation, or livelihood impacts arise, the Project will establish and communicate a cut-off date for eligibility. Persons occupying or using affected land after the cut-off date will not be eligible for compensation or assistance unless otherwise required by law or EBRD requirements.

9.2. Vulnerable Persons

Particular attention will be given to vulnerable individuals and households who may be disproportionately affected by Project activities. Vulnerable persons may include:

- Elderly persons living alone;
- Persons with disabilities;
- Female-headed households;
- Low-income households;
- Lone-parent households;
- Households with dependent children; and
- Other socially or economically disadvantaged groups identified during Project implementation.

Where impacts on vulnerable persons are identified, additional assistance measures will be developed and implemented to ensure that they are not disadvantaged by Project activities and that their livelihoods and living standards are maintained or restored.

9.3. Principles for Implementation

The entitlement framework will be implemented in accordance with the following principles:

- Avoidance and minimisation of land acquisition and livelihood impacts;
- Fair and transparent treatment of all affected persons;
- Meaningful consultation and participation;
- Timely provision of compensation and assistance where required;
- Special consideration for vulnerable groups;
- Restoration of livelihoods where impacts occur; and
- Monitoring of outcomes to ensure effectiveness of mitigation measures.

10. Livelihood Restoration Measures

10.1. Objectives

The objective of the Livelihood Restoration Measures is to ensure that any Project-related economic displacement is avoided wherever possible and that affected persons are assisted in restoring, and where feasible improving, their livelihoods and standards of living to pre-project levels, consistent with the requirements of EBRD ESR 5.

Although the Blue 3 Photovoltaic Project is not expected to result in significant livelihood impacts due to its location on leased land with limited productive use, this framework establishes measures that will be applied if livelihood impacts are identified during Project implementation.

The specific objectives are to:

- Avoid or minimise livelihood impacts through project design and management measures;
- Ensure that affected persons do not experience a reduction in income or living standards as a result of Project activities;
- Provide fair and timely compensation where losses occur;
- Restore access to productive resources where feasible;
- Promote local economic opportunities generated by the Project;
- Provide targeted support to vulnerable households; and
- Monitor the effectiveness of livelihood restoration measures throughout Project implementation.

10.2. Landowners

The Project has secured land through voluntary long-term lease agreements rather than permanent acquisition. As ownership remains with the landowners, the principal livelihood restoration measure is the provision of secure and predictable lease income.

Potential measures include:

- Payment of lease fees in accordance with negotiated lease agreements;
- Transparent and documented payment arrangements;
- Long-term income security through 49-year lease agreements;
- Annual or periodic indexation of lease payments, where provided in contractual arrangements;
- Timely payment of all agreed lease obligations;
- Ongoing communication with landowners throughout the Project lifecycle;
- Access to the Project grievance mechanism; and
- Compensation for any Project-related damages occurring outside agreed lease areas.

The lease agreements provide a stable and predictable income stream that is expected to exceed the economic value currently derived from the affected land.

10.3. Farmers

Although no significant agricultural production has been identified within the Project footprint, measures have been established should agricultural impacts occur during construction or operation.

Potential measures include:

- Avoidance of productive agricultural land wherever possible;
- Maintenance of access to adjacent agricultural land;
- Restoration of temporarily affected agricultural areas following construction;
- Compensation for verified crop losses attributable to Project activities;
- Repair of any Project-related damage to irrigation or drainage infrastructure;
- Agricultural productivity support measures where justified by the scale of impact;
- Assistance in identifying alternative cultivation areas where feasible; and
- Ongoing consultation with affected land users.

Any compensation for crop losses will be based on documented losses and applicable valuation methods.

10.4. Livestock Owners

The Project recognises that livestock grazing may occur within the wider Project area and that temporary restrictions could arise during construction activities.

Potential measures include:

- Maintenance of access to surrounding grazing areas where feasible;
- Provision of alternative access routes during construction;
- Advance notification of construction activities that may affect grazing movements;
- Restoration of temporarily affected areas following construction;
- Consultation with livestock owners regarding access requirements;
- Avoidance of unnecessary restrictions on grazing activities; and
- Support for improved pasture access where impacts are identified.

Given the availability of surrounding grazing areas, significant impacts on livestock-based livelihoods are not anticipated.

10.5. Employment Measures

The Project will seek to maximise local economic benefits through employment and procurement opportunities during construction and operation.

Potential measures include:

- Priority consideration for suitably qualified local workers;
- Transparent recruitment procedures;
- Equal employment opportunities for women and men;
- Employment opportunities for local contractors and service providers where feasible;
- Skills development and on-the-job training programmes;
- Contractor commitments to local recruitment where practicable;
- Dissemination of employment opportunities through local communication channels; and

- Monitoring of local employment performance.

While employment opportunities are not considered compensation measures under ESR 5, they may contribute to broader livelihood enhancement and local economic development.

10.6. Vulnerable Households

The Project recognises that certain individuals and households may be more vulnerable to Project-related impacts and may require additional support.

Potentially vulnerable groups may include:

- Elderly persons living alone;
- Persons with disabilities;
- Female-headed households;
- Low-income households;
- Lone-parent households;
- Households with dependent children; and
- Other vulnerable individuals identified during Project implementation.

Where Project-related livelihood impacts are identified, additional assistance may include:

- Targeted consultation and engagement;
- Individualised assessment of impacts and needs;
- Assistance accessing compensation or grievance processes;
- Additional livelihood restoration support where appropriate;
- Enhanced monitoring of outcomes; and
- Referrals to available social support programmes where relevant.

The Project will ensure that vulnerable persons are not disproportionately affected by Project activities and that livelihood restoration outcomes are equitable and inclusive.

10.7. Monitoring and Adaptive Management

The effectiveness of livelihood restoration measures will be monitored throughout Project implementation. Monitoring will focus on:

- Implementation of lease agreements;
- Complaints and grievances related to livelihoods;
- Access restrictions and land use impacts;
- Employment and local procurement outcomes;
- Impacts on vulnerable households; and
- Effectiveness of mitigation and restoration measures.

Where monitoring identifies unforeseen livelihood impacts, additional corrective actions and support measures will be developed in consultation with affected persons and relevant stakeholders.

11. Stakeholder Engagement and Grievance Mechanism

11.1. Stakeholder Engagement

Stakeholder engagement for the Blue 3 Photovoltaic Project has been undertaken in accordance with the principles and requirements of EBRD Environmental and Social Requirement 10 (ESR 10): Stakeholder Engagement and Information Disclosure.

To support compliance with ESR 10, the Project has prepared a standalone Stakeholder Engagement Plan (SEP), which establishes the framework, methods, responsibilities, and procedures for stakeholder engagement throughout the Project lifecycle. The SEP identifies Project stakeholders, outlines information disclosure and consultation activities, establishes the Project grievance mechanism, and defines the approach for ongoing stakeholder engagement during construction, operation, and decommissioning.

The SEP also covers stakeholder engagement activities related to land leasing, land use, access restrictions, livelihood considerations, grievance management, and any land-related issues addressed through this Land Acquisition and Livelihood Restoration Plan (LALRP). Accordingly, this chapter provides a summary of stakeholder engagement activities relevant to land acquisition and livelihood restoration, while detailed stakeholder engagement requirements and records are presented in the Project SEP.

The objective of stakeholder engagement is to ensure that potentially affected persons and interested stakeholders are informed about the Project, provided with opportunities to express their views, and able to participate meaningfully in decisions affecting them.

The stakeholder engagement process supports the implementation of this LALRP by facilitating communication regarding voluntary land leasing arrangements, land use, access requirements, potential livelihood impacts, grievance management, and mitigation measures.

Stakeholder engagement activities undertaken for the Project have confirmed that the Project land has been secured through voluntary lease agreements and that no physical displacement, household relocation, or significant livelihood impacts are anticipated. Nevertheless, engagement with landowners, neighbouring land users, local authorities, and communities will continue throughout Project implementation to ensure that any unforeseen land-related concerns are identified and addressed in a timely and transparent manner.

11.2. Grievance Mechanism

The Project has established a grievance mechanism that enables stakeholders to submit questions, concerns, complaints, or suggestions related to Project activities.

The grievance mechanism is intended to:

- Provide an accessible and transparent process for addressing concerns;
- Facilitate timely resolution of grievances;
- Track and document stakeholder concerns;
- Improve Project performance through stakeholder feedback; and
- Meet the requirements of EBRD ESR 10.

The grievance mechanism is available free of charge and can be accessed without fear of retaliation.

11.3. Ongoing Engagement Programme

Stakeholder engagement will continue throughout construction, operation, and decommissioning of the Project.

Future engagement activities will include:

- Regular communication with affected landowners;
- Consultation regarding construction schedules and access arrangements;
- Disclosure of relevant Project updates;
- Ongoing engagement with local authorities and communities;
- Monitoring of stakeholder concerns and grievances;
- Targeted engagement with vulnerable groups, where required; and
- Periodic review of stakeholder engagement effectiveness.

The Stakeholder Engagement Plan (SEP) will guide ongoing consultation activities and will be updated as necessary to reflect Project developments and stakeholder needs.

Through continued engagement and transparent communication, the Project aims to maintain constructive relationships with stakeholders and ensure that any land-related concerns are identified and addressed in a timely and effective manner.

11.4. Stakeholder Consultation and Engagement Summary for the LALRP

In accordance with EBRD Performance Requirement 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) and Performance Requirement 10 (Information Disclosure and Stakeholder Engagement), Blessed Investment and its consultants implemented a comprehensive stakeholder engagement programme to identify potential land-related impacts, verify land ownership and land use status, assess the presence of land users and livelihood dependencies, and ensure that affected stakeholders had opportunities to participate in project planning and decision-making.

Stakeholder engagement activities were conducted from December 2021 through April 2026 and included meetings with local communities, village representatives, local government authorities, agricultural and drainage authorities, potentially affected landowners, local businesses, workers, and other interested stakeholders. Consultations were undertaken through individual meetings, landowner consultations, public consultation events, site visits, technical discussions, and regular community engagement activities.

Particular attention was given to consultations with landowners and local authorities to verify land ownership, confirm current land use practices, identify any formal or informal land users, and assess potential impacts on livelihoods and access. These consultations are documented in the Landowner Meeting Records (Meetings 1–4) and associated Minutes of Meeting (MoMs). In addition, ongoing stakeholder engagement activities undertaken during the construction and operational phases are documented in the Community Liaison Officer (CLO) Monthly Reports, which provide evidence of continuous engagement with local communities, village leaders, businesses, workers, educational institutions, healthcare providers, and vulnerable households.

The consultation process confirmed that the land identified for the Blue 3 Project is not actively used by local communities for agricultural production, grazing, residential purposes, or other livelihood activities, and that no physical displacement, economic displacement, or access restrictions are anticipated as a result of project implementation. Feedback obtained through the landowner consultations, community meetings, and CLO engagement activities has been incorporated into project planning and management measures to ensure compliance with EBRD ESR5 and EST10 requirements.

11.4.1. Objectives of Consultation

The consultation programme was designed to:

- Disclose information regarding the Blue Projects and associated land requirements.
- Verify land ownership and land tenure arrangements.
- Identify any formal or informal land users.
- Assess potential impacts on livelihoods, access, irrigation and drainage infrastructure.
- Obtain stakeholder views regarding project development.
- Establish and communicate the Project Grievance Mechanism.
- Ensure ongoing engagement throughout project development and permitting.

11.4.2. Stakeholders Consulted

The following stakeholder groups were engaged:

Table 5 The stakeholder groups engaged

Stakeholder Category	Stakeholders Consulted
Local Communities	Residents of Sheq Marinas, Topojë, Seman and surrounding villages
Local Government	Fier Municipality, Topojë Administrative Unit
Village Authorities	Head of Village of Sheq Marinas, Head of Village of Topojë
Agricultural Authorities	Directorate of Agriculture and Drainage, Fier Municipality
Technical Authorities	Drainage Board and irrigation specialists
Potentially Affected Persons	Landowners and local residents participating in public consultations
Project Representatives	Blessed Investment, Matrix Konstruksion and ABKONS

Detailed information regarding each consultation meeting, including dates, participants, discussion topics, outcomes, and follow-up actions, is provided in Annex A: Stakeholder Consultation Register and Meeting Records.

11.4.3. Stakeholder Consultation Summary

Land Ownership and Land Use

Consultations with the Topojë Administrative Unit confirmed that the land required for the Blue 3 Project had previously been subject to Albania's land restitution and compensation process and is registered as privately owned land. Local authorities confirmed that they were not aware of any informal occupants, tenants, sharecroppers, or other land users within the project footprint. The land was described as unproductive and unsuitable for agricultural activities.

Subsequent consultations with local communities, businesses, and village representatives confirmed that the project area is located away from residential areas and is not currently used for agriculture, grazing, residential purposes, or other livelihood-related activities. Stakeholders stated that the proposed development would not affect their access to land, community infrastructure, or economic activities.

Irrigation and Drainage Infrastructure

Consultations with Fier Municipality, the Directorate of Agriculture and Drainage, and the Drainage Board focused on the identification and management of secondary and tertiary drainage channels located within or adjacent to the project area. Although historical records of the drainage network were limited, joint site inspections and technical reviews were undertaken to verify channel locations and ensure that project design incorporates measures to maintain the functionality of the existing irrigation and drainage system.

Community Feedback

Community consultations indicated broad acceptance of the project. Stakeholders confirmed that the project land is not used for livelihood activities and that no impacts on access, agricultural production, grazing activities, or economic activities are anticipated. Community members generally viewed the project positively due to the employment opportunities created during construction and operation. The main concerns raised during consultations related to local road conditions and electricity supply interruptions within the wider area rather than project-related land impacts.

Vulnerable Households

As part of the wider stakeholder engagement programme, village representatives assisted in identifying households experiencing economic hardship within nearby communities. Household visits were conducted to better understand local socio-economic conditions and identify opportunities for community support initiatives. These consultations did not identify any vulnerable households that would be affected by project land acquisition or restrictions on land use.

Grievance Mechanism

A Project Grievance Mechanism was established and disclosed through consultation meetings, public notices, grievance forms, and direct engagement with stakeholders. Community members were informed that grievances could be submitted in person, by telephone, email, through grievance boxes, or anonymously. Throughout the consultation period, no grievances relating to land acquisition, land ownership, access restrictions, economic displacement, livelihood impacts, or other ESR5 related issues were recorded.

Consultation Outcomes

The consultation process confirmed that:

- The project land is privately owned and ownership has been verified.
- No informal land users, tenants, or occupants were identified.
- The land is not currently used for agricultural, grazing, residential, or livelihood purposes.
- No physical displacement or economic displacement is anticipated.
- No impacts on community access or local infrastructure are expected.
- Existing drainage infrastructure has been incorporated into project planning.
- No land-related grievances have been received.
- Stakeholders will continue to be engaged throughout project implementation through the Stakeholder Engagement Plan and Project Grievance Mechanism.

Based on the consultation findings, no Project Affected Persons (PAPs) requiring compensation, livelihood restoration, or resettlement assistance have been identified.

12. Institutional Arrangements

12.1. Overview

The implementation of this Land Acquisition and Livelihood Restoration Plan (LALRP) will be the responsibility of the Blue 3 Photovoltaic Project Company, supported by designated personnel and, where necessary, external specialists. Clear roles and responsibilities have been established to ensure effective management of land-related issues, stakeholder engagement, grievance management, monitoring, and reporting throughout the Project lifecycle.

The institutional arrangements are designed to ensure compliance with Albanian legislation, EBRD Environmental and Social Policy (2024), ESR 1, ESR 5, and ESR 10.

12.2. Project Company

The Project Company (SPV Blue 3 Sh.p.k.) has overall responsibility for the implementation of this LALRP.

Key responsibilities include:

- Ensuring compliance with Project commitments and lender requirements;
- Providing resources necessary for implementation of the LALRP;
- Managing land lease agreements and associated documentation;
- Overseeing stakeholder engagement and grievance management processes;
- Coordinating contractors and consultants involved in Project implementation;
- Monitoring land-related impacts and mitigation measures;
- Ensuring corrective actions are implemented where required; and
- Reporting on LALRP implementation to lenders and relevant stakeholders.

The Project Company retains ultimate accountability for ensuring that all land-related commitments are implemented effectively.

12.3. Community Liaison Officer (CLO)

The Community Liaison Officer (CLO) will serve as the primary point of contact between the Project and local stakeholders.

The CLO will be responsible for:

- Maintaining regular communication with landowners, local communities, and other stakeholders;
- Supporting implementation of the Stakeholder Engagement Plan (SEP);
- Disseminating Project information;
- Receiving and recording grievances and community concerns;
- Supporting consultation activities;
- Facilitating engagement with vulnerable groups;
- Coordinating responses to stakeholder inquiries; and
- Reporting stakeholder issues to Project management.

The CLO will play a key role in identifying and addressing potential land and livelihood concerns before they escalate.

12.4. Land Team

The Project Land Team will be responsible for managing all land-related matters associated with the Project.

The Land Team's responsibilities include:

- Management of land lease agreements;
- Verification of land ownership and land use information;
- Maintenance of land acquisition and leasing records;
- Coordination with cadastral authorities and public institutions;
- Monitoring compliance with lease agreements;
- Investigation of land-related grievances;
- Assessment of any unforeseen land impacts;
- Implementation of compensation or livelihood restoration measures, if required; and
- Support for monitoring and reporting activities under this LALRP.

Where specialised expertise is required, the Land Team may be supported by legal advisors, surveyors, valuers, or social specialists.

12.5. Contractors

All contractors engaged by the Project will be required to comply with the requirements of this LALRP, the Environmental and Social Management Plan (ESMP), and contractual environmental and social obligations.

Contractors will be responsible for:

- Avoiding unnecessary impacts on land and livelihoods;
- Maintaining access to neighbouring properties where feasible;
- Preventing damage to land, crops, infrastructure, and community assets;
- Reporting land-related incidents and complaints;
- Cooperating with the Project Company on stakeholder engagement activities; and
- Implementing corrective measures where impacts occur.

Contractor performance will be monitored by the Project Company.

12.6. Independent Monitoring

Given the limited land acquisition requirements, the use of voluntary lease agreements, and the absence of anticipated physical displacement, independent external monitoring is not currently considered necessary.

However, if significant unforeseen land acquisition, economic displacement, livelihood impacts, or stakeholder concerns arise during Project implementation, the Project Company may appoint an independent monitor or external specialist to:

- Review compliance with EBRD ESR 5 requirements;
- Verify implementation of compensation and livelihood restoration measures;
- Assess stakeholder engagement effectiveness;
- Review grievance management performance; and
- Provide independent recommendations for corrective actions.

The need for independent monitoring will be reviewed periodically based on Project performance and lender requirements.

12.7. Reporting and Review

Implementation of the LALRP will be monitored throughout the Project lifecycle. Internal monitoring reports will be prepared periodically and will include information on:

- Land lease management;
- Stakeholder engagement activities;
- Grievances received and resolved;
- Land-related incidents;
- Livelihood restoration measures, if applicable;
- Compliance with Project commitments; and
- Corrective actions undertaken.

The LALRP will be reviewed and updated as necessary to reflect changes in Project design, land requirements, stakeholder concerns, or lender requirements.

13. Monitoring and Evaluation

13.1. Internal Monitoring

The Project Company will establish an internal monitoring system to assess compliance with this LALRP and verify that land-related commitments are implemented effectively throughout the Project lifecycle. Monitoring will be undertaken by the Project management team, supported by the Community Liaison Officer (CLO) and Land Team.

The objectives of internal monitoring are to:

- Verify implementation of land lease agreements;
- Monitor stakeholder engagement activities;
- Track grievances and their resolution;
- Identify any unforeseen land or livelihood impacts;
- Assess the effectiveness of mitigation measures; and
- Support adaptive management and corrective actions where required.

Table 6 Internal monitoring indicators

Indicator	Unit	Frequency
Number of land lease agreements signed	Number	Annual
Total land area leased for the Project	ha	Annual
Number of land-related grievances received	Number	Quarterly
Percentage of grievances resolved within the target timeframe	%	Quarterly
Number of stakeholder engagement activities undertaken	Number	Quarterly
Number of participants in consultation activities	Number	Quarterly
Number of vulnerable persons engaged	Number	Quarterly
Number of land-related incidents reported	Number	Quarterly
Number of local workers employed by the Project	Number	Quarterly
Percentage of local workforce employed	%	Quarterly
Number of workers receiving training	Number	Annual

Monitoring results will be documented and incorporated into the Project's environmental and social performance reporting system.

13.2. Livelihood Monitoring

Although no significant livelihood impacts are currently anticipated, livelihood monitoring will be undertaken to verify that Project activities do not result in unforeseen economic displacement or adverse livelihood outcomes.

Where impacts are identified, the Project will assess whether affected persons have been able to maintain or restore their pre-project livelihood conditions and whether additional support measures are required.

Table 7 Livelihood Monitoring Indicators

Indicator	Unit	Frequency
Number of households reporting Project-related livelihood impacts	Number	Annual
Number of land users affected by access restrictions	Number	Annual
Number of farmers affected by temporary land occupation	Number	Annual
Number of livestock owners affected by grazing restrictions	Number	Annual

Indicator	Unit	Frequency
Household income levels of affected persons (where applicable)	Qualitative/Quantitative	Annual
Agricultural production levels on temporarily affected land (where applicable)	Qualitative/Quantitative	Annual
Access to grazing areas maintained or restored	Qualitative	Annual
Number of compensation claims related to livelihood impacts	Number	Annual
Number of livelihood restoration measures implemented	Number	Annual
Satisfaction of affected persons with mitigation measures	Qualitative	Annual

Evaluation of Livelihood Outcomes

The Project will periodically evaluate monitoring results to determine whether:

- Livelihood impacts have occurred;
- Existing mitigation measures are effective;
- Access to land, grazing areas, and community infrastructure has been maintained;
- Any affected persons have experienced a decline in income or living standards attributable to Project activities; and
- Additional corrective actions or livelihood restoration measures are required.

If monitoring identifies significant unforeseen livelihood impacts, the Project will review and update this LALRP and implement additional mitigation or restoration measures consistent with EBRD ESR 5 requirements.

Reporting

Monitoring results will be reviewed by Project management and included in periodic environmental and social monitoring reports. Findings will be used to improve Project performance and ensure ongoing compliance with Albanian legislation and EBRD Environmental and Social Requirements.

Given the limited land acquisition requirements, the use of voluntary lease agreements, and the absence of anticipated physical displacement, the monitoring programme is designed to be proportionate to the Project's risk profile while ensuring that any unforeseen impacts are identified and addressed in a timely manner.

14. Budget

The Project has secured the required land through voluntary lease agreements and does not anticipate significant livelihood restoration requirements or physical displacement. Nevertheless, a budget has been established to ensure that sufficient resources are available for implementation of this LALRP, including management of any unforeseen impacts that may arise during construction and operation.

The budget will be reviewed periodically and updated as necessary throughout Project implementation.

Table 8 Indicative LALRP Budget

Budget Item	Estimated Cost (€)
Lease Payments	Included in Project Land Leasing Budget
Stakeholder Engagement	Included in ESIA and SEP Implementation Budget
Grievance Management	Included in Project E&S Management Budget
Monitoring and Evaluation	Included in Project E&S Management Budget
Crop Compensation	Contingency Provision
Livelihood Restoration Measures	Contingency Provision
External Specialist Support	Contingency Provision
Contingency	Included in Project Contingency Budget
Total Budget	Covered through Project E&S and Land Management Budgets

Budget Management

The Project Company will be responsible for ensuring that adequate financial resources are available for implementation of this LALRP. Any compensation, livelihood restoration measures, monitoring activities, or corrective actions identified during Project implementation will be financed by the Project.

The contingency allocation will be used to address unforeseen impacts, including temporary land occupation, access restrictions, crop losses, or livelihood impacts that may not have been identified during the initial assessment. Budget requirements will be reviewed periodically and adjusted as necessary to ensure compliance with Albanian legislation and EBRD ESR 5 requirements.

15. Implementation Schedule

Implementation of the LALRP will be integrated into the overall Project schedule and will continue throughout the construction and operational phases. Given that land has been secured through voluntary lease agreements and no significant livelihood impacts have been identified, implementation activities will focus primarily on lease management, stakeholder engagement, grievance management, monitoring, and management of any unforeseen impacts.

LALRP Implementation Schedule

Table 9 Indicative LALRP implementation schedule

Activity	Year 1	Year 2	Year 3
Finalisation of lease agreements	X		
Verification of land ownership and documentation	X		
Stakeholder engagement and consultation	X	X	X
Grievance mechanism implementation	X	X	X
Construction-phase land management	X		
Livelihood restoration measures (if required)	X	X	
Monitoring of land-related impacts	X	X	X
Monitoring of access restrictions	X	X	X
Livelihood monitoring (if required)	X	X	X
Corrective actions (if required)	X	X	X
Internal reporting and review	X	X	X
LALRP update and revision (if required)		X	X

Table 10 Key Milestones

Milestone	Timing
Completion of land leasing process	Prior to construction
Verification of absence of physical displacement and informal land users	Prior to construction
Commencement of construction monitoring	Start of construction
First annual LALRP review	End of Year 1
Completion of construction-phase monitoring	End of construction period
Operational phase monitoring and reporting	Throughout Project operation

The implementation schedule will be reviewed periodically and updated as necessary to reflect Project progress, stakeholder feedback, monitoring results, and any changes in Project design or land requirements.

16. Annexes

16.1. Annex A Land Consultation Register

Blue 3 Photovoltaic Project, Fier Municipality, Albania

Table 11 Land Consultation Register Blue 3

Date	Stakeholder	Participants	Consultation Objective	Key Discussion Points	Concerns Raised	Actions Agreed	Status
29 Jan 2024	Topojë Administrative Unit	Altin Mihali (Abkons), Bekim Hysa (Abkons), Viktor Tirana, Erald Prifti, Aleksandër Kola	Verify land ownership and land use status within the Blue 3 project area	Review of cadastral information, ownership status of project parcels, land restitution history and current land classification	Need to confirm whether any land users or occupiers were present within the project area	Administrative Unit to provide ownership confirmations and support verification through cadastral records	Completed
25 Jul 2024	Fier Municipality	Armando Subashi (Mayor), Pellumb Llakaj, Entela Kola, Jonel Mine, Altin Mihali, Bekim Hysa	Inform municipal authorities about Blue 3 development and permitting requirements	Project presentation, land use status, municipal permitting requirements, drainage infrastructure	Lack of information regarding ownership and management of drainage channels in the project area	Municipality agreed to support permitting process and participate in further technical consultations	Completed
25 Jul 2024	Fier Municipality – Agriculture and Drainage Directorate	Same participants	Assess irrigation and drainage infrastructure potentially affected by Blue 3	Secondary and tertiary drainage channels, maintenance responsibilities, field verification needs	Absence of historical records and maps of irrigation and drainage channels	Joint site visit and field verification proposed to identify existing infrastructure	Ongoing
21 Feb 2025	Fier Municipality	Altin Mihali, Entela Kola, Ergest Petriti, Jonel Mine	Review irrigation and drainage scheme relevant to Blue 3 design	Reconstruction of irrigation and drainage network layout, review of available information, site verification	Missing drainage and irrigation maps and uncertainty regarding channel arrangements	Joint work initiated to re-establish channel layout and assess implications for project design	Ongoing
21 Feb 2025	Fier Municipality Technical Team	Same participants	Verify land categories and drainage infrastructure through field inspection	Site visit to assess land status and existing channels	Need for confirmation of drainage and channel administration arrangements	Technical review and site verification completed; additional coordination initiated	Ongoing
25 Sep 2025	Drainage Board / Directorate of Agriculture	Altin Mihali, Ergest Petriti, Entela Kola	Review preliminary Blue 3 design and compatibility with irrigation infrastructure	Presentation of preliminary design, drainage channel layout, infrastructure protection measures	Potential interference with irrigation and drainage systems if not properly incorporated into final design	Project to integrate authority recommendations into detailed engineering design	Ongoing
Sep 2025	Seman Administrative Unit	Bekim Hysaj (CLO), Aleksandër Kola	Inform local authorities about commencement of project activities and stakeholder engagement arrangements	Project progress, employment opportunities, grievance management, community communication	Request for community support measures, including public lighting improvements	Continued communication with local authorities and referral of employment opportunities to contractors	Ongoing

Date	Stakeholder	Participants	Consultation Objective	Key Discussion Points	Concerns Raised	Actions Agreed	Status
Sep–Oct 2025	Village Leaders (Grykë and Sheq Marinas)	Bekim Hysaj (CLO), Tonin Calja, Vladimir Prence	Community liaison and identification of vulnerable households	Project updates, community needs, employment opportunities, vulnerable family identification	Need for support to economically vulnerable households and local infrastructure improvements	Household assessments undertaken and potential community support measures identified	Ongoing
Sep 2025 – Apr 2026	Local Communities (Grykë, Topojë, Sheq Marinas)	CLO and local residents	Provide project updates and collect community feedback	Construction progress, employment opportunities, traffic management, grievance mechanism	Road conditions, traffic increases, occasional electricity interruptions	Communities informed about grievance channels; concerns monitored through ongoing engagement	Ongoing
Oct 2025 – Apr 2026	Local Businesses	CLO and local business representatives	Monitor project impacts on local businesses	Project progress, traffic management, local economic benefits	Deteriorated road conditions and electricity supply interruptions	Issues documented and communicated through stakeholder engagement process	Ongoing
Oct 2025 – Apr 2026	Project Workforce (Matrix, AMR, 3S, Juer Security, Abkons O&M)	CLO and contractor employees	Worker engagement and awareness raising	Labour rights, grievance mechanism, Code of Labour requirements, health and safety	No significant concerns raised during consultations	Continued worker training and awareness sessions; grievance boxes maintained on site	Ongoing
Sep 2025 – Apr 2026	Health and Education Institutions	CLO, Topojë Health Centre staff, Grykë Ambulance staff, Lili Stavre School representatives	Inform institutions about project activities and strengthen community coordination	Construction activities, road safety, emergency preparedness, community support initiatives	Road safety concerns associated with increased traffic near schools	Continued coordination with institutions and implementation of community support measures	Ongoing

16.2. Annex B Land parcel register

The Land Parcel Register provides a record of all privately owned parcels affected by the Blue 3 Photovoltaic Project. The register has been developed based on cadastral information and land ownership documentation and will be updated as necessary throughout Project implementation.

Table 12 Land parcel register

Parcel No.	Cadastral Zone	Ownership Type	Total Parcel Area (m²)	Total Parcel Area (ha)	Project Status	Land Use	Address	Remarks
11/2	3358	Private	66,878	6.69	Leased	Saline/degraded land	Sheq Marinas, Fier	Lease agreement signed
102	3358	Private	164,685	16.47	Leased	Saline/degraded land	Sheq Marinas, Fier	Lease agreement signed
104	3358	Private	24,100	2.41	Leased	Saline/degraded land	Sheq Marinas, Fier	Lease agreement signed
107	3358	Private	92,876	9.29	Leased	Saline/degraded land	Sheq Marinas, Fier	Lease agreement signed
108	3358	Private	65,515	6.55	Leased	Saline/degraded land	Sheq Marinas, Fier	Lease agreement signed
109	3358	Private	10,800	1.08	Leased	Saline/degraded land	Sheq Marinas, Fier	Lease agreement signed
134/1	3358	Private	167,646	16.76	Leased	Saline/degraded land	Sheq Marinas, Fier	Lease agreement signed
Total			592,500	59.25				

Summary

- Number of affected parcels: 7
- Ownership category: Private ownership
- Number of affected landowners: 1 ownership group
- Total affected area: 592,500 m² (59.25 ha)
- Land acquisition method: Voluntary long-term lease agreements
- Physical displacement: None
- Economic displacement: None identified
- Informal land users: None identified during site assessment
- Project location: Sheq Marinas, Fier Municipality, Albania

The Project has secured access to all affected parcels through voluntary lease agreements. Ownership verification was undertaken through review of cadastral and property registration documentation. No expropriation, compulsory acquisition, or involuntary resettlement has been required for the Project.

16.3. Annex C Lease agreement templates

This Land Lease Agreement ("Agreement") is entered into on [Date] between:

1. Parties

Lessor (Landowner):

- Name: _____
- National ID No.: _____
- Address: _____
- Telephone: _____
- Hereinafter referred to as the "Lessor".

Lessee (Project Company):

- SPV Blue 3 Sh.p.k.
- Registered Address: _____
- Represented by: _____
- Hereinafter referred to as the "Lessee".

2. Purpose of the Agreement

The Lessor agrees to lease to the Lessee the land described in this Agreement for the purposes of developing, constructing, operating, maintaining, and decommissioning the Blue 3 Photovoltaic Project.

3. Description of the Property

Parcel Number	Cadastral Zone	Total Parcel Area (m²)	Leased Area (m²)
_____	_____	_____	_____

Location: _____

Municipality: Fier

Administrative Unit: _____

4. Lease Duration

The lease shall commence on ___ / ___ / _____ and remain valid for a period of **49 years**, unless terminated earlier in accordance with this Agreement.

5. Lease Payment

The Lessee shall pay the Lessor an annual lease fee of:

EUR _____ per year

Payment schedule:

☐ Annual

☐ Semi-annual

☐ Other: _____

Payment shall be made through bank transfer to the account designated by the Lessor.

6. Indexation

Where applicable, lease payments shall be adjusted periodically in accordance with the following mechanism:

7. Rights and Obligations of the Lessee

The Lessee shall:

- Use the leased land solely for Project purposes;
- Comply with applicable Albanian legislation;
- Prevent unnecessary damage to adjacent land;
- Maintain health, safety, and environmental standards;
- Restore any temporary construction areas not required for operation;
- Respect any rights retained by the Lessor under this Agreement.

8. Rights and Obligations of the Lessor

The Lessor shall:

- Confirm legal ownership of the leased land;
- Ensure that the land is free from undisclosed claims or encumbrances;
- Allow access to the leased area for Project activities;
- Notify the Lessee of any ownership-related disputes that may arise.

9. Voluntary Transaction Declaration

The Lessor confirms that:

- Participation in this lease agreement is voluntary;
- No expropriation powers have been used or threatened;
- The terms of the agreement have been explained and understood;
- Adequate opportunity was provided to seek independent advice;
- The agreement has been entered into freely and without coercion.

10. Access and Easements

The Lessee may establish reasonable access arrangements, utility corridors, and easements necessary for Project construction and operation, subject to applicable legal requirements.

11. Grievance and Dispute Resolution

Any dispute arising from this Agreement shall first be addressed through amicable negotiations.

Where resolution cannot be reached, either party may pursue remedies available under Albanian law.

The Lessor shall also have access to the Project grievance mechanism throughout the Project lifecycle.

12. Termination

This Agreement may be terminated:

- By mutual written agreement of the Parties;
- Upon expiration of the lease term;
- In accordance with applicable legal provisions;
- In the event of a material breach by either Party.

13. Governing Law

This Agreement shall be governed by the laws of the Republic of Albania.

14. Signatures

LESSOR

Name: _____

Signature: _____

Date: _____

LESSEE (SPV Blue 3 Sh.p.k.)

Name: _____

Position: _____

Signature: _____

Date: _____

Witness (Optional)

Name: _____

Signature: _____

Date: _____

16.4. Annex D Livelihood restoration monitoring indicators

This Annex presents the indicators that will be used to monitor the effectiveness of livelihood restoration measures and verify that Project activities do not result in unmitigated economic displacement or deterioration of living standards.

Given that the Blue 3 Photovoltaic Project is not expected to result in significant livelihood impacts, the monitoring framework has been designed as a proportional measure to identify and address any unforeseen impacts that may arise during construction or operation.

G.1 Monitoring Framework

Table 13 Monitoring framework

Objective	Indicator	Unit of Measurement	Baseline	Target	Monitoring Frequency	Responsibility
Maintain landowner income	Number of lease payments made on time	Number / %	0	100% on-time payments	Annual	Project Company
Maintain landowner income	Number of landowner complaints regarding lease payments	Number	0	0 unresolved complaints	Quarterly	Land Team
Maintain access to land	Number of complaints regarding access restrictions	Number	0	No unresolved complaints	Quarterly	CLO / Land Team

Objective	Indicator	Unit of Measurement	Baseline	Target	Monitoring Frequency	Responsibility
Protect agricultural activities	Number of farmers affected by Project activities	Number	0	No significant impacts	Annual	Land Team
Protect agricultural production	Verified crop losses caused by Project activities	Number	0	Compensation provided where applicable	Annual	Project Company
Maintain grazing access	Number of livestock owners affected by access restrictions	Number	0	No permanent restrictions	Annual	Land Team
Maintain grazing access	Availability of alternative grazing access where required	Qualitative	Existing access maintained	Access maintained/restored	Annual	Project Company
Avoid economic displacement	Number of households experiencing Project-related income loss	Number	0	No uncompensated losses	Annual	Project Company
Protect vulnerable persons	Number of vulnerable households affected	Number	To be confirmed	Appropriate support provided	Annual	CLO
Restore livelihoods where impacts occur	Number of livelihood restoration measures implemented	Number	0	100% implementation	Annual	Project Company
Stakeholder satisfaction	Satisfaction of affected persons with mitigation measures	Qualitative	To be established if impacts occur	Majority satisfied	Annual	CLO
Effective grievance management	Percentage of livelihood-related grievances resolved within target timeframe	%	0	100%	Quarterly	Project Company

G.2 Trigger Indicators

The following indicators will trigger further investigation and corrective action:

- Delayed lease payments;
- Repeated grievances related to land access or livelihood impacts;
- Verified crop losses caused by Project activities;

- Restrictions on access to grazing areas;
- Identification of previously unknown land users;
- Evidence of reduced household income attributable to Project activities; and
- Impacts affecting vulnerable individuals or households.

Where such impacts are identified, the Project will undertake additional assessment and implement corrective measures in accordance with the LALRP and EBRD ESR 5 requirements.

G.3 Reporting

Monitoring results will be reviewed periodically and included in Project environmental and social performance reports. Any significant land-related or livelihood-related issues identified through monitoring will be addressed through corrective actions, stakeholder engagement, and updates to the LALRP where necessary.

The monitoring programme will remain in place throughout construction and the initial years of Project operation, with the frequency and scope of monitoring adjusted based on Project performance and stakeholder feedback.