KOSOVO SOLAR – TUCEP AND VERIQ ENVIRONMENTAL AND SOCIAL ASSESSMENT

Non-technical Summary

February 2026

CLIENT:	European Bank for Reconstruction and Development (EBRD)
PROJECT:	Kosovo Solar – Tucep and Veriq
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ABBREVIATIONS

CESMP	Construction Environmental and Social Management Plan
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESR	(EBRD's) Environmental and Social Requirement
ESMP	Environmental and Social Management Plan
EU	European Union
GBVH	Gender-based Violence and Harassment
NTS	Non-technical Summary
OESMP	Operational Environmental and Social Management Plan
OHS	Occupational Health and Safety
PVPP	Photovoltaic Power Plant
SEP	Stakeholder Engagement Plan
WMP	Waste Management Plan

1 INTRODUCTION

Project Context. The European Bank for Reconstruction and Development (EBRD) is considering financing the construction and operation of two large-scale solar photovoltaic power plants (PVPPs) in Kosovo, together with the related infrastructure, with a combined capacity of 142.2 MWp and a total footprint of approximately 140 ha (the "Project"):

- PVPP Tucep – capacity 98.5 MWp; and
- PVPP Veriq – capacity 43.7 MWp.

The Project has been categorised as "B" under the EBRD Environmental and Social Policy (2024)[1].

Project Implementation Arrangements. The overall responsibility for implementing the Project lies with Quant Renewables Kosovo Invest Limited ("the Borrower"), a company based in the United Kingdom. This company will be the direct recipient of the EBRD loan and will report to EBRD on Project implementation. The loan funds will be on-lent to two local special purpose companies—AKG Solar Tucep and AKG Solar Veriq, which have been established to own and operate the respective PVPPs. Construction of the PVPPs will be carried out by SolarApex ("the Contractor"), an experienced company specialising in solar energy projects.

Regulatory and Policy Alignment. The Project is one of the largest renewable energy investments planned in Kosovo and supports the country's transition to cleaner energy sources. It is consistent with national strategies and plans, including the Kosovo National Energy Strategy 2022–2031, the National Energy and Climate Plan 2025–2030 and the National Climate Change Strategy 2019–2028.

The Project also aligns with relevant European Union (EU) policies and legislation, particularly EU Renewable Energy Directive (RED III) and the European Climate Law.

At the national level, initial regulatory approvals have already been obtained, including Environmental Consents based on the conducted Environmental Impact Assessments and Construction Permits for both PVPPs. To fully comply with Kosovo legislation (including the *Law on Construction*, *Law on Environmental Protection* and *Law on the Energy Regulator*), additional permits and licences will be required, including Environmental Permits, Use (Occupancy) Permits and an Energy Generation License.

This document is the Non-Technical Summary (NTS) of the Environmental and Social (E&S) Assessment conducted for the Project between October 2025 and January 2026. The NTS presents key information in non-technical language, including the Project background and current status, a description of the E&S baseline, an overview of potential impacts and the main mitigation measures required to ensure compliance with the EBRD Environmental and Social Policy 2024. It also outlines the Project's approach to information disclosure and stakeholder engagement. The NTS forms part of the Project's disclosure package and has been prepared alongside the Stakeholder Engagement Plan.

[1] An EBRD project is categorised B when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures.

2 PROJECT DESCRIPTION

2.1 Project Sites and Components

PVPPs Tucep and Veriq will be located in the Municipality of Istog, within the Peja District in north-western Kosovo. The PVPP Tucep will be built near the settlements of **Kernine and Tucep**, while the PVPP Veriq will be located close to the settlements of **Veriq and Veriq i Ri**.

The PVPP sites are included in the **Zoning Map of the Municipality of Istog** for the period 2024 - 2032[2], which designates the areas as suitable for solar energy development.

The PVPP Tucep will occupy **92 hectares** across **20 land plots**, while the PVPP Veriq will cover around **49 hectares** across **36 land plots**. In addition to the PV modules, the Project will include supporting electrical infrastructure needed to safely deliver electricity to the national grid. This includes the construction of **four transformer substations**: two located within the Tucep site, one within the Veriq site, and one external substation (Kërrninë 2). Electricity generated at the two PVPPs will be transmitted through **underground cables** to the Kërrninë 2 substation, which will then connect to the existing Peja 3 substation, enabling integration into the national electricity network.

Each PVPP will also include a small **administrative and storage building**. These buildings will support day-to-day operations, monitoring and security activities, and will provide space for staff as well as for storing equipment and maintenance materials.

An overview of the described infrastructure is provided in the figure below.

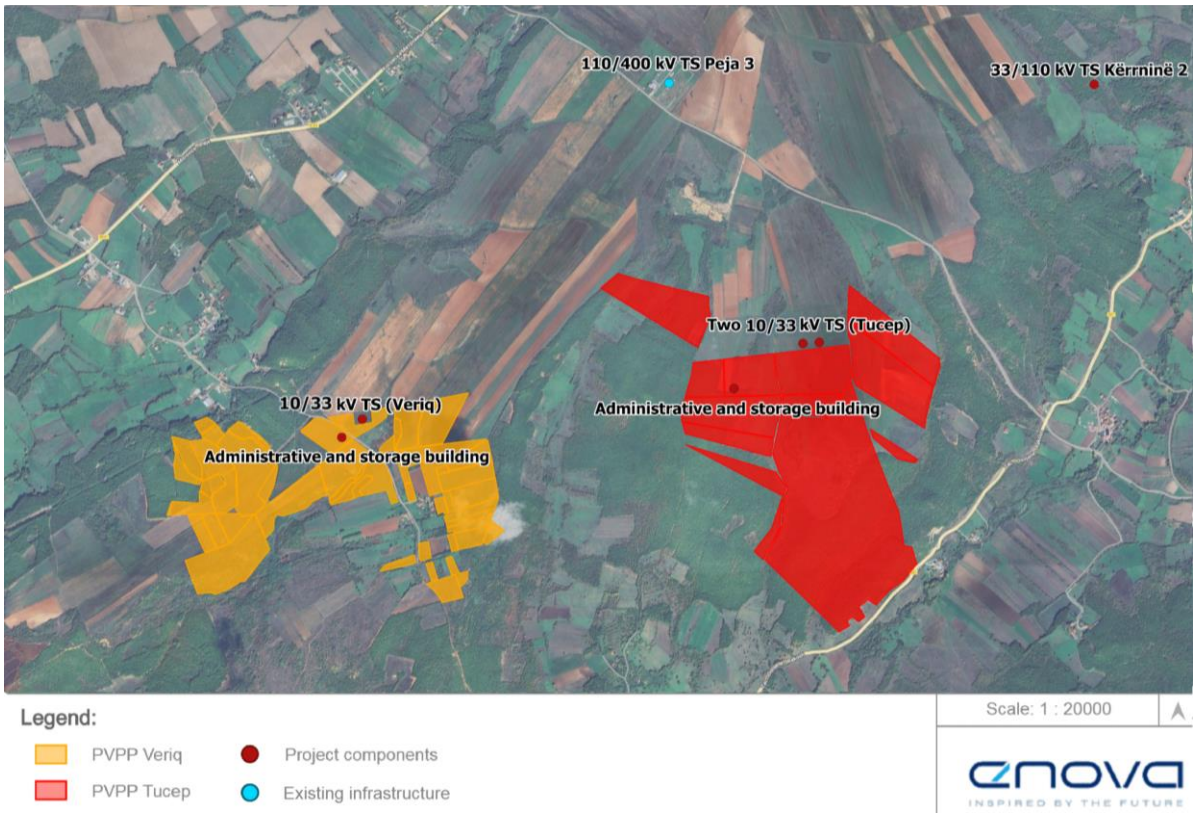

Figure 2-1: Map of Project components (based on Main Design drawings)

[2] Available at: https://istog.rks-gov.net/harta-zonale-komunale-2024-2032/

Both sites are accessible through the existing road network infrastructure. However, **internal access roads** within the PVPP plots will be constructed as part of the Project.

2.2 Previous Activities and Project Development Status

The Project has completed several important preparation steps, mainly related to permits and approvals, land arrangements, technical design and statutory public consultations.

Environmental Impact Assessments (EIAs) for both PVPPs were completed in 2022, following a decision by the Ministry of Environment, Spatial Planning and Infrastructure that a full assessment was required. Based on the approved EIAs, Environmental Consents were issued in January 2023. Before the PVPPs begin operation, Environmental Permits will also be required to confirm that construction has been carried out in line with the approved environmental conditions.

Secure **access to land** has been established through long-term lease agreements. All Project land is state-owned and leased through a primary leaseholder (the company Gekos), with further sub-lease agreements signed with the AKG Solar Tucep and AKG Solar Veriq in 2023 and 2024. These agreements grant the companies the right to build, operate and maintain the PVPPs and related infrastructure throughout the Project lifetime. *Note: Informal users of the land have been identified and will be further consulted and supported through appropriate measures, in line with EBRD requirements (for details, please see Chapter 4 SUMMARY OF E&S IMPACTS/RISKS AND MITIGATION MEASURES).*

From a technical standpoint, site investigations and **Main Deigns** were completed in 2024.

Construction Conditions setting out the layout and technical requirements of the PVPPs and associated infrastructure were issued in mid-2024, while Construction Permits were obtained in January 2026. Once construction is complete, Occupancy Certificates will be required.

The Project has also secured **agreements for connection to the national electricity network**, confirming how and where the PVPPs will connect to the grid. After construction, Energy Generation Licenses will be obtained before the start of commercial operation.

Stakeholder engagement has been carried out in accordance with Kosovo legal requirements. Information disclosure and consultations were undertaken at key stages of Project development, including during the EIA process (2022) and the issuance of Construction Conditions (2024). The Project was also presented to the public alongside other solar developments during preparation of the Municipal Zoning Map.

In addition, further stakeholder engagement was undertaken as part of this **E&S assessment**, in line with EBRD requirements. This included consultations with **informal land users** and **nearby communities** to understand their awareness of the Project, their views and concerns, local conditions and potential community benefits.

2.3 Project Benefits

During the construction phase, the Project is expected to create temporary **employment opportunities for local workers**. It will also support the **development of local skills** through on-the-job experience and provide opportunities for local subcontractors and businesses to participate in Project activities.

The most significant benefits will occur during the operational phase of the PVPPs. These include the production of renewable electricity, which will increase the supply of clean, low-carbon energy

and reduce dependence on fossil fuels. By replacing part of electricity generation from conventional power plants, the Project will **contribute to climate change mitigation** through **reduced greenhouse gas emissions**.

The Project will also help to **improve air quality** by lowering emissions of air pollutants, such as sulphur oxides, nitrogen oxides, and particulate matter, associated with fossil fuel-based electricity generation. In addition, the Project will **strengthen energy security** by increasing domestic renewable energy capacity and diversifying Kosovo's energy mix.

More broadly, the Project will **support sustainable economic development** by encouraging investment in renewable energy. Continued use of local services, subcontractors and operational staff will provide ongoing economic benefits at the local level.

3 SUMMARY OF BASELINE CONDITIONS

BIODIVERSITY BASELINE

Biodiversity desktop and rapid field surveys were conducted during October 2025 to establish the biodiversity baseline for the Project area. The surveys covered habitats and vegetation, plants, invertebrates, amphibians, reptiles, birds, bats and non-volant mammals.

The Project area is largely **dominated by agricultural land,** primarily used for low-intensity crop production. These areas have been under long-term human use and therefore have limited ecological value. The most common crops are cereals, and regular cultivation prevents the development of natural vegetation. Small and fragmented patches of **degraded oak woodland** are present mainly along field boundaries and less disturbed margins. Areas of **ruderal and fallow vegetation** were also recorded, mainly on disturbed or abandoned land. A very small area of **hay meadow** was identified at PVPP Veriq site.

A total of **110 plant species** were recorded within the Project area. The plant community is typical for intensively used agricultural landscapes and is dominated by common and widespread species adapted to disturbed soils. Only one plant species of conservation concern – corn speedwell, was identified in the Project area.

Invertebrate surveys recorded a total of **11 species**, reflecting the intensive agricultural character of the area. All recorded species are common and widespread, and none are considered threatened. One invasive species, the harlequin ladybird, was recorded.

A total of **six herpetofauna species** were recorded in the wider Project area, including three amphibian species and three reptile species. Among these, three reptile species and two amphibian species are listed under EU Habitats Directive. No important breeding sites, hibernation areas, or other key habitats for amphibians or reptiles were identified within the Project area.

Bird surveys recorded a total of **seven bird species** in the wider Project area. Five bird species are protected under the EU Birds Directive. The recorded species are typical for agricultural land, woodland edges, and open landscapes. No nesting sites were identified within the Project area. Most birds were recorded in nearby forested or semi-natural habitats outside the Project plots and are expected to use the area only occasionally for foraging or movement.

Bat surveys confirmed the presence of **five species** within the wider Project area. All recorded bat species are protected under EU Habitats Directive. Bat activity was generally low and mainly associated with surrounding woodland and agricultural habitats. No bat roosts, caves, or other important shelters were identified within or near the Project area. The recorded bat activity is considered to reflect foraging or migratory movements, rather than the presence of resident bat populations.

Two non-volant mammal species were recorded in the wider Project area, neither of which is of conservation concern.

The Project area is not located within any **nationally or internationally protected areas**. The nearest nationally designated protected area, Bjeshkët e Nemuna National Park, is located more than 10 km from both PVPP sites. Several small nature monuments, mainly protecting individual trees or water sources, are located within a 5 km radius of the Project area. The nearest internationally recognised sites, including the candidate Emerald Site Prokletije (alb. Bjeshkët e Nemuna) and the Mokra Gora (alb. Malet e Moknës) Important Bird Area, are located more than 5 km from the Project area.

E&S BASELINE

The Project is located in a gently rolling rural **landscape** within the Dukagjini Plain, at the foothills of Mokra Gora Mountain. The area consists of low hills and shallow valleys and lies at elevations between approximately 450 and 550 meters above sea level. While the landscape shows clear signs of human activity, it retains a traditional rural character.

The PVPP Tucep is planned to be located above the settlements of **Kernine** and **Tucep**, with a regional road separating the site from these villages. Only a small number of houses are located close to the site (50 m south), and the surrounding area is sparsely populated. The PVPP Veriq will be located near the settlements of **Veriq** and **Veriq i Ri**, where several houses are relatively close to the Project area (10-60 m). Agriculture and employment in the public sector are the main sources of income for local residents.

Visibility of the PV modules will vary depending on location. From most nearby settlements, views of the Project will be limited due to the natural shape of the land and existing vegetation such as trees, hedgerows and scrub. However, some properties in settlements of Kernine (up to five properties) and Veriq i Ri (up to ten properties), will have direct line of sight to the PV modules. Visibility from more distant settlements will be reduced or fully screened by terrain and woodland.

The Municipality of Istog generally benefits from good **air quality** due to the absence of large industrial facilities. Local air pollution mainly comes from road traffic, residential heating and occasional construction activities. There are no air quality monitoring stations in the immediate Project area.

Ground conditions at both sites are suitable for construction. The land is mostly flat to gently sloping, with stable soils. Field data confirmed that the soil allows rainwater to naturally infiltrate into the ground, and no soil contamination has been identified.

The Project sites lie within the Istog River catchment, but there are no **rivers, streams or water bodies** at the Project plots. The nearest surface water features are the Kujava River, located 86 m from the Tucep site, and the Shushica River, situated 212 m north of the Veriq site. No sensitive aquifers or designated groundwater protection zones have been identified in the vicinity of the Project sites.

Existing **noise** levels in the area are mainly influenced by local traffic and everyday activities. No significant noise sources are present nearby, and the area is generally quiet outside of occasional construction periods.

Waste collection services in the Municipality of Istog are provided by the regional public waste company Ambienti. Facilities for the collection and recycling of electrical and electronic waste exist at the national level, although specialised facilities are located outside the immediate Project area.

The **climate** in the Peja–Istog region is moderate, with warm summers and relatively mild winters. Occasional strong winds and periods of dry weather occur. Potential identified hazards include wildfires, windstorms and flooding.

The nearest **schools and healthcare facilities** are located in nearby cities, several kilometres from the Project sites - in Istog (6 km north from both sites), Gjurakoc (6 km west from the Veriq site) and Rakosh (3 km east from the Tucep site). No **cultural heritage sites**, **religious buildings**, **tourism facilities** or **recreational areas** were identified within or close to the Project area.

4 SUMMARY OF E&S IMPACTS/RISKS AND MITIGATION MEASURES

The potential negative E&S impacts of the Project are site-specific and can be effectively avoided, reduced or managed by following the measures set out in the Project's **E&S Management Plan (ESMP)** and **E&S Action Plan**.

For construction purposes, the Contractor will prepare and implement a **Construction Environmental and Social Management Plan (CESMP)** to ensure that impacts are properly managed on site.

For the first two years of operation, the Contractor will also provide operation, maintenance and training support to the Project companies, AKG Solar Tucep and AKG Solar Veriq, to ensure a smooth transition to independent management. Hence, the Contractor will also prepare and implement an **Operational Environmental and Social Management Plan (OESMP)**.

Both CESMP and OESMP will be based on the developed ESMP. Quant Renewables Kosovo Invest Limited, as the Borrower, will retain overall responsibility for the Project and for ensuring that all E&S requirements are properly implemented.

A **summary of the main E&S impacts and risks** during both construction and operation is provided in the following sections, together with a **description of measures** to manage them.

Some **adjustments to the Project's Main Design** will also be required, in order to ensure proper management of E&S risks during the Project's operation. These adjustments will be incorporated into the **Detailed Design**, which is a legal step confirming the final layouts and technical parameters during construction.

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
Biodiversity	The introduction of PV modules may create reflective surfaces that could disturb flying birds and bats. During construction, vegetation clearance and ground works will result in the permanent loss of habitats within the Project footprint and temporary disturbance to wildlife due to noise, movement of machinery, dust and lighting. There is also a risk of injury to animals during construction activities and a possibility of spreading invasive plant species through soil disturbance and equipment movement. During operation, PV modules may pose a collision risk for	The Detailed Design will include measures to reduce reflection and visual disturbance and to maintain habitat connectivity, such as preserving strips of existing shrubby vegetation and establishing low-growing native vegetation under and between solar panels. Through the implementation of CESMP, vegetation clearance will be restricted strictly to the defined Project area and will be carried out progressively to allow animals to move away. Works will avoid the bird nesting season, and construction activities will be supervised by a qualified ecological expert when necessary. Measures will also be implemented to prevent harm to wildlife, control invasive plant species

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
	birds and bats, and artificial lighting could disturb nocturnal species if not properly managed. However, given the nature of the habitats and the absence of sensitive biodiversity features, these risks are considered limited.	and restore temporarily disturbed areas using native vegetation. As part of the OESMP, site lighting will be kept to a minimum and designed to avoid attracting insects and bats during operation phase. Vegetation within the Project area will be managed through mowing or controlled grazing. The Project area will be subject to annual monitoring for invasive plant species, and appropriate control measures will be implemented if their spread is detected. Bird and bat monitoring will be carried out during the first year of operation, and additional mitigation measures will be applied if monitoring identifies elevated mortality.
Land and soil	The Project will involve ground works related to the installation of PV modules, substations, internal roads and underground cables. These activities may temporarily disturb soil and lead to localised soil compaction, erosion or accidental contamination, particularly in the event of fuel or oil spills from construction machinery. During operation, potential soil impacts are mainly related to accidental leaks of transformer oil or improper maintenance of septic tanks associated with administrative facilities. However, significant soil contamination may only occur in the case of unplanned or accidental events.	The Detailed Design will incorporate geotechnical recommendations to ensure stable foundations and prevent ground instability and structural damage. Transformer stations will be equipped with containment systems to capture any accidental oil leaks, and septic tanks will be properly sealed and regularly maintained. In line with CESMP, hazardous materials such as oils and lubricants will be stored in sealed, leak-proof containers, and spill response materials will be available on site. Machinery will be regularly inspected to prevent leaks, and any accidental spills will be immediately contained and cleaned. Topsoil will be carefully removed, stored and reused for site restoration, while excavated material will be managed to minimise waste and prevent erosion. Disturbed areas will be reinstated following completion of works. Through the implementation of OESMP, regular inspections will be carried out to detect any potential oil leaks or damage to infrastructure. Hazardous materials will be properly stored and managed, and septic tanks will be maintained by authorised personnel.
Water	During construction, water will be used for sanitary needs, concrete works, equipment cleaning and dust suppression. There is a potential risk of localised soil and groundwater contamination if wastewater or construction-related liquids are improperly managed or accidentally released. During operation, potential impacts are mainly associated with accidental oil or grease spills during maintenance	The Detailed Design will include a system to minimise water consumption during operation, particularly for the cleaning of PV modules. Oil and grease separators will be installed at parking areas in front of administrative buildings, to capture and treat runoff before discharge. In line with CESMP, wastewater and hazardous substances will be managed in accordance with good practice, and improper discharge to the environment will not be allowed. Ecological toilets will be installed for

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
	activities, as well as inefficient use of water for cleaning PV modules. Significant impacts on groundwater are considered unlikely and would only occur in the event of major accidental releases.	workers and will be regularly serviced by authorised providers. Measures for the safe storage and handling of hazardous substances and waste will be implemented to prevent water pollution. As part of the OESMP, cleaning of PV modules will be optimised to minimise water use. Opening of ponds or other uncontrolled water sources for panel cleaning will not be permitted, and abrasive or chemical cleaning agents will not be used. The effectiveness of module cleaning practices will be regularly reviewed and adjusted where necessary to ensure efficient water use. In the event of major maintenance works, the same protective measures as those applied during construction will be implemented.
Air quality	During construction, temporary air quality impacts may occur due to dust generated by earthworks, vehicle movement on unpaved surfaces and installation activities. Exhaust emissions from construction machinery and vehicles may also occur. These impacts are expected to be localised and short-term, depending on weather conditions, particularly during dry and windy periods. During operation, the PVPPs will not generate air emissions. Minor, short-term emissions may occur only during occasional maintenance activities.	Through the implementation of CESMP, dust generation will be controlled by regular watering of the construction area, limiting vehicle speeds on site and avoiding simultaneous activities that generate high levels of dust. Transport of loose materials will be carried out using covered vehicles, and construction machinery will be properly maintained to reduce exhaust emissions. Vehicles and machinery will be properly maintained, and engines will be turned off when not in use to reduce emissions and noise. During operation, no specific mitigation measures are required, as the Project will not produce air emissions. The same measures as in the construction phase will be applied during major maintenance works.
Noise and vibrations	During construction, increased noise levels may occur due to transportation of materials, operation of construction machinery and on-site activities. These impacts may be more noticeable at the PVPP Veriq site due to the closer proximity of residential properties; however, noise levels are expected to remain low and not cause significant disturbance at either PVPP site. Minor vibrations may also occur during certain construction activities, although significant vibration impacts are not expected. During operation, the PVPPs will not generate continuous noise or vibration. Temporary and low-level noise may occur	As part of the CESMP, noisy activities will be limited to daytime hours, and simultaneous use of high noise equipment will be avoided. Construction equipment and vehicles will be properly maintained to ensure efficient and quiet operation. Residents will be informed in advance about planned construction activities and their expected duration. Workers will be provided with appropriate protective equipment, and machinery will be turned off when not in use. In the event of major maintenance works during operation, the same measures as those applied during construction will be implemented in line with the OESMP.

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
	only during maintenance works.	
Waste and hazardous materials	During construction, various types of waste will be generated, including inert construction waste such as excavated soil, concrete residues and metal off-cuts, as well as smaller quantities of municipal waste from the workforce. Hazardous waste may also be generated in limited amounts, such as waste oils, lubricants, fuels and damaged equipment. During operation, waste generation will mainly relate to maintenance activities and may include municipal waste, waste electrical and electronic equipment, damaged PV modules and transformer oil. Improper handling or disposal of these materials could pose environmental and safety risks.	For the construction phase, a Project-specific Waste Management Plan (WMP) will be developed in line with national legislation. The WMP will define procedures to prevent improper waste disposal within and around the construction site. All waste generated during construction will be separated by type and will not be mixed. Temporary waste storage areas will be established on sealed surfaces and protected from weather conditions. Hazardous waste, including waste electrical and electronic equipment, will be transferred only to authorised operators. Burning, burying or uncontrolled disposal of waste will not be permitted. Construction workers will be trained in proper waste handling and emergency response procedures, and any accidental spills of hazardous substances will be immediately contained and managed as hazardous waste. During operation, a Project-specific Operational WMP will be implemented and will include similar measures as the Construction WMP. In addition, liquid hazardous waste, such as transformer oil, will be stored in properly labelled containers with secondary containment. Records of waste quantities will be maintained, and recycling and reuse of PV modules and other electrical equipment will be prioritised where feasible. Employees involved in operation and maintenance activities will be trained in proper waste handling procedures.
Climate change	During construction, small-scale greenhouse gas emissions may occur due to the use of construction machinery and the production and transport of construction materials. These emissions are temporary and limited in scale. The Project may also be exposed to climate-related risks during its lifetime, including extreme weather events such as heatwaves, wildfires, heavy rainfall and strong winds. Such events could potentially affect PV modules, electrical equipment and overall operation of the PVPPs if not properly addressed through design and management measures. During operation, the Project will contribute positively to	The Detailed Design will include drainage systems to manage stormwater, fire protection measures in line with national requirements, lightning protection systems and structural design compliant with relevant standards for wind loads. An Emergency Preparedness and Response Plan will be developed as part of the CESMP. This Plan will define clear roles, responsibilities and procedures to be followed in the event of climate-related hazards. Measures include training of workers, safe planning of works during adverse weather, securing materials and equipment, carrying out hot works away from combustible materials, and maintaining effective communication with emergency services.

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
	climate change mitigation by generating renewable electricity and reducing greenhouse gas emissions.	During operation, a Fire Protection Plan will be developed as part of OESMP. In addition, OESMP measures include regular maintenance of drainage systems, routine inspection of structures to ensure stability, vegetation management around the Project area to reduce wildfire risk, safe storage of flammable substances, and coordination with emergency services. A Procedure for Responding to Natural Disaster Events will be applied to protect workers and equipment.
Landscape and visual aspects	The Project will introduce PV modules, substations and associated infrastructure into a dominantly rural landscape. During construction, temporary visual impacts are expected due to construction activities and equipment, which may be noticeable to nearby residents, road users and people working in open areas. The character of the surrounding landscape may be temporarily affected, but impacts will be localised and short-term. During operation, the PVPPs will represent a new long-term feature in the landscape. Visual impacts may be experienced by nearby residents, road users and people working in open areas, particularly in locations where the PVPP sites are closer to residential properties (Veriq i Ri). However, due to the low height of the PVPPs, existing vegetation and the rolling landform, these impacts will be localised to an area of about one km of each PVPP site.	The Detailed Design will include the use of non-reflective PV modules and non-reflective materials for visible structures, with colours selected to blend with the surrounding landscape. Permanent lighting will be designed to minimise off-site visibility and light spill, with lights directed downwards and shielding applied where necessary. As part of the CESMP, good housekeeping practices will be applied to keep the site tidy and organised. Construction areas will be limited to the minimum necessary, vegetation clearance will be minimised, and disturbed areas will be progressively reinstated once no longer required. In line with OESMP, existing vegetation along site boundaries will be retained where possible, and additional planting will be implemented to provide visual screening, particularly near residential areas. Landscape enhancement measures will be maintained and monitored to ensure their long-term effectiveness.
Glint and glare	During operation, a limited number of residential properties may have a direct view of the PV modules, particularly those located close to the Project sites or on elevated ground. Specifically, these include up to five properties located on elevated ground 750 m to the south-east of the PVPP Tucep in Kernine settlement, and up to ten properties in Veriq i Ri located at a close distance (up to 150 m to the west) from the PVPP Veriq (please see maps in Appendix A). Existing vegetation around most of these properties is expected to partially screen views and reduce potential glare effects. With the implementation of visual mitigation measures,	As part of the OESMP, nearby residents will be informed about the potential for solar reflection (glare) from the PV modules under certain conditions. A procedure will be in place to receive and address any glare-related complaints from affected property owners. If glare effects are reported and confirmed, appropriate mitigation measures will be implemented in consultation with the affected residents. These may include additional visual screening measures, such as vegetative buffers or other suitable screening solutions. The effectiveness of any implemented mitigation will be monitored to ensure that glare impacts are adequately addressed.

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
	including additional vegetative screening where required, the risk of significant glint and glare effects is expected to be low.	
Occupational health and safety (OHS)	Construction workers will be exposed to a range of physical hazards typical of large-scale solar developments, including manual handling, lifting operations, working at heights and the use of heavy machinery. Significant electrical hazards exist during the installation of PV modules, cabling, transformers and substations, where improper handling can lead to shocks or burns. The Project location presents specific risks, notably stormy winds characteristic of the Istog region and biological hazards from venomous snakes, such as the nose-horned viper. Therefore, delayed medical emergency response for construction workers increases potential severity of such accidents or injuries due to the distance of local healthcare facilities. During operation, risks are primarily related to fire hazards and electrical hazards during routine repairs and component replacements.	The Project will implement a comprehensive, site-specific OHS Plan that includes strict safety guidelines, mandatory use of personal protective equipment, and safe work instructions for all high-risk activities. Electrical safety will be managed through specialised training and lockout/tagout procedures. To address regional hazards, an Emergency Preparedness and Response Plan will be established to manage extreme weather events and snake encounters. A medical station will be set up at the construction site, with a qualified medical professional present during working hours. Trained first-aid staff and appropriate equipment will be available at all times. Arrangements will be in place with nearby health facilities for emergencies, and a dedicated vehicle will be available to quickly transport injured persons if needed. During operation, the Project will utilise automation and remote monitoring for high-voltage equipment to minimise worker exposure, and all maintenance will be governed by an Operation and Maintenance Manual and OHS Risk Assessments in full compliance with Kosovo legislation.
Community health and safety	Local communities may experience temporary disturbances during construction. Residents within 130 meters of the site may be affected by dust emissions and noise, with the highest sensitivity at PVPP Veriq, where some houses are located only 10 meters away. A concentrated transportation campaign may cause short-term traffic congestion, road deterioration and increased safety risks for pedestrians and livestock.	Baseline conditions of the main public access roads in the vicinity of the Project sites will be documented prior to construction. The condition of these roads will be monitored during construction and any deterioration demonstrably attributable to Project-related traffic will be remediated in coordination with the relevant municipal authorities, as appropriate. A Traffic Management Plan will be developed and implemented to coordinate deliveries, enforce speed limits, and ensure pedestrian safety. To minimise disturbances, the Project will implement dust suppression and noise control measures, while sturdy fencing and signage will prevent unauthorised access to high-risk zones.
Labour and working	The Project expects to engage approximately 300 workers during the peak construction phase. While the Contractor has established corporate procedures for ethical conduct and	A Project-specific Labour and Working Conditions Plan will be developed to ensure all workers, whether direct or contracted, are treated fairly and provided with written contracts. This plan will require mandatory

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
conditions	the prevention of forced or child labour, these must be adapted to meet the specific requirements of the Project and EBRD standards. No dedicated workers' camp is planned for the construction phase. Accommodation will be arranged locally, using existing facilities such as apartments, hotels and hostels. During operation, labour risks are significantly lower due to the small workforce that is planned to be employed for maintenance, security and administrative tasks. An HR Policy covering both EBRD and Kosovo legislation requirements will need to be established.	induction training for contractor and subcontractor workers covering labour standards, code of conduct, grievance procedures and the prevention and reporting of gender-based violence and harassment; set out subcontractor management requirements; promote local employment by prioritising recruitment from surrounding communities where feasible; and ensure that any worker accommodation provided meets acceptable health, safety, and hygiene standards. For the operation phase, an HR policy covering both EBRD and Kosovo legislation requirements will be developed.
Economic displacement and livelihood restoration	A number of informal land users who cultivate land within the Project area of Veriq have been identified. They collectively are using approx. 126 hectares. These users do not hold legal ownership or formal agreements for the land but have been using it for crop production for many years. These households were contacted and consulted in line with EBRD requirements, in order to understand their land use practices, livelihood dependency and potential sensitivities. Loss of access to this land during construction may result in partial reductions in their household incomes. One informal agricultural structure (a barn) is also partially located within the Project footprint.	Affected informal land users will be informed in advance about construction activities and land access restrictions. A grievance mechanism will be available to address concerns. Where feasible, affected informal users and their households will be prioritised for local employment during construction (for informal users who express their interest in such opportunity). Options to provide access to alternative agricultural land will be considered for informal users experiencing income loss to support continued agricultural production and livelihood continuity. Where alternative land is offered, the Borrower may also offer to facilitate access to agronomic advice to support consideration of land suitability and the transition of agricultural activities on a case-by-case basis. If construction affects standing or unharvested crops of informal land users, the Borrower shall provide advance notice to allow harvesting. Where losses occur due to insufficient notice, affected households will be compensated for any lost crops. Measures to avoid or reduce impacts on the affected agricultural structure will be agreed with the household before construction starts (including different viable options: design adjustments, land exchange arrangements or relocation or replacement of the structure).

TOPIC	POTENTIAL IMPACTS/RISKS	MITIGATION MEASURES
Cultural heritage	No cultural heritage sites have been identified within or near the Project area. The PVPP sites are located outside any nationally protected zones or areas of archaeological interest. However, during construction works involving excavation, there is a low risk of unexpected archaeological finds, which could cause delays or damage if not properly managed. No cultural heritage impacts are expected during operation, as no further ground disturbance will occur.	A Chance Finds Procedure will be implemented in line with national legislation and EBRD requirements. Construction workers will be trained to recognise potential finds and to immediately stop work and notify the competent authorities.
Cumulative impacts	Apart from the PVPP Veriq and PVPP Tucep, another project – the construction of nearby PVPP Kernine 1 and PVPP Kernine 2 - is also planned within the same Municipality. In case that construction of these other PVPP sites overlaps in time with PVPPs Tucep and Veriq, a temporary increase in dust emissions and short-term noise impacts may occur due to machinery operation, transport, and site preparation works. No other developments are currently planned that would meaningfully contribute to cumulative impacts.	In line with the CESMP, construction activities will be coordinated among all sites to avoid simultaneous peak earthworks, high-noise operations and overlapping truck movements. Delivery routes will be optimised to minimise noise and dust in populated areas, and schedules will consider timing to reduce disturbance during early morning and night hours (e.g. avoidance of overlapping of earthworks and heavy vehicle movement, avoidance of high-noise activities especially during morning and night and minimisation of transportation cumulative noise by optimising delivery routes and limiting truck movement through populated areas.)

5 SUMMARY OF THE E&S ACTION PLAN

The Project's **E&S Action Plan (ESAP)** establishes the framework for managing environmental, social, labour, health and safety, biodiversity and stakeholder engagement aspects associated with Project implementation. It defines specific actions to ensure compliance with EBRD E&S Requirements (ESRs), applicable Kosovo legislation and relevant EU directives. The ESAP applies to the Borrower (Quant Renewables Kosovo Invest Limited), its special purpose companies (AKG Solar Tucep and AKG Solar Veriq) and the Contractor, and forms part of the financing agreement with the EBRD.

A summary of the key ESAP actions is presented below.

ESR 1: Assessment and Management of E&S Risks and Impacts

- All remaining permits and approvals (Environmental Permit, Use Permit, Energy Generation Licence) will be obtained and updated Permits Registers will be maintained.
- A Project-specific Environmental and Social Management System will be developed and implemented by the Borrower to ensure all issues and risks are properly managed and regularly checked throughout the Project,.
- Construction, operational and decommissioning environmental and social management plans (CESMP, OESMP and DESMP) will be developed and implemented for the respective Project phases, ensuring management of E&S throughout the full Project lifecycle.
- Qualified E&S Specialists will be engaged for construction and operation phases to oversee compliance and support implementation.
- Periodic E&S reports will be submitted to EBRD, and any significant incidents or material project changes will be notified in a timely manner.

ESR 2: Labour and Working Conditions

- A Supply Chain Management System will be developed and implemented ensure that the Project buys goods and services responsibly.
- A Project-specific Labour and Working Conditions Plan will be developed and implemented for the construction phase. A workers' grievance mechanism and a Code of Conduct, including gender-based violence and harassment (GBVH) prevention measures, will be established and enforced.
- An HR Policy aligned with ESR 2 and applicable national legislation will be adopted for the operational phase.

ESR 3: Resource Efficiency and Pollution Prevention and Control

- The Detailed Design will incorporate pollution prevention and environmental protection measures prescribed in the ESMP (please see Chapter 4 for details).
- A monitoring system will be established to track electricity generation and performance to ensure resource efficiency.
- All equipment will be regularly maintained in line with manufacturers' recommendations.

- Waste Management Plans will be developed and implemented for construction, operation and decommissioning phases, and waste handling and disposal practices will comply with Kosovo legislation and EBRD requirements.

ESR 4: Health, Safety and Security

- The Detailed Design will incorporate measures addressing climate-related risks, including lightning protection, fire protection systems, adequate drainage systems and structural resilience to windy conditions.
- Emergency Preparedness and Response Plans will be developed for both construction and operation phases.
- Occupational Health and Safety Plans, including risk assessments and emergency procedures, will be developed and implemented.
- A Traffic Management Plan will be prepared and implemented to ensure community safety during construction, and specific measures will be implemented to prevent unauthorised access to construction sites.
- Nearby residents potentially affected by solar glare will be informed, and mitigation measures will be implemented to minimise visual impacts.
- Adequate fencing and fire protection measures will be maintained during operation.

ESR 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

- Advance notice of land access restrictions will be provided to affected informal users.
- Priority access to employment opportunities will be facilitated for affected households, subject to meeting job requirements.
- Access to alternative agricultural land will be offered where feasible and appropriate.
- Potential crop losses resulting from insufficient notice will be compensated.
- Impacts on informal structures will be avoided where possible or mitigated through consultation and proportionate measures.
- Livelihood mitigation measures will be documented and reported.

ESR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

- The Detailed Design will incorporate vegetation and planting measures prescribed in the ESMP.
- A qualified Ecological Clerk of Works will be appointed during construction to supervise the works and provide training for site personnel on species protection.
- Measures will be implemented to prevent the spread of invasive species and to restore affected habitats.
- Bird and bat monitoring surveys will be conducted during operation.
- Adaptive management measures will be applied during operation, where monitoring identifies risks or impacts.

ESR 8: Cultural Heritage

- A Chance Finds Procedure will be developed prior to construction to include steps that workers must follow if they unexpectedly discover items of possible cultural or historical value during digging; and workers will be trained on its implementation.

ESR 10: Stakeholder Engagement

- The Project's Stakeholder Engagement Plan will be implemented and updated as necessary throughout the Project lifecycle. A Project-level grievance mechanism will be established and maintained (please see Chapter 6 for details).
- A qualified GBVH Focal Point will be appointed prior to construction. Confidential procedures for handling GBVH complaints will be implemented.
- Stakeholder engagement activities and grievance management outcomes will be documented and reported regularly.

6 DISCLOSURE AND COMMUNICATION

Planned Stakeholder Engagement and Public Disclosure. A Stakeholder Engagement Plan (SEP) has been developed to communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle and enable timely identification and resolution of potential concerns.

The SEP is part of the disclosure package together with this NTS.

The documents will be available in Albanian and Serbian in printed form in the premises of the Municipality, while an announcement about their availability will be posted on:

- the bulletin board of the Municipality of Istog,
- online news portal "Zëri" (used for previous consultations, as there are no printed local newspapers in the area).

Planned Public Consultations prior to Construction Works. A public consultation meeting will be organised prior to construction to present the Project to the public and offer a clear understanding of the Project's scope and objectives, including information on expected duration of construction works, the available Project-specific grievance mechanism and any other relevant Project specifics. This meeting will be organised in a local venue such as the restaurant "Kafe N'Pike" (where previous consultation meetings were held) to enable ease of access for all community members. Local residents will be informed about the exact date, time and venue where the meetings will be held 10 days in advance through the same two channels used before.

In addition, the village leaders in the area (Veriq, Tucep and Veriq i Ri) will be directly notified of the announcement and requested to further disseminate the information within their communities (e.g., through local notice boards and direct communication with households), with particular attention to reaching elderly residents, persons with limited mobility or disabilities, and other vulnerable stakeholders who may not regularly access online channels.

Specific consultations with individual organisations or households can also be requested organised as needed, for example, to discuss land-related matters, issues arising due to the proximity of houses to the PVPP sites or any other Project-related concerns. The Borrower will be open to and facilitate such meetings upon request (or where the Project identifies the need such as in the case of vulnerable individuals who may not be able to attend public consultation meetings due to limited mobility, disability, etc.), and will make reasonable efforts to arrange them promptly and in a format convenient for affected stakeholders. Where appropriate, these consultations may be conducted by telephone or in another format convenient for the stakeholder.

Informing the Public about Construction Works. Specifics about construction sites, anticipated commencement dates, expected duration of planned works and any predicted disruptions in traffic flows and any other potential inconveniences will be published at least 30 days before start of works through the same two channels listed above.

Consultations during Operation and Maintenance. Houses at a distance of around 10 m from the PV site (in Veriq i Ri settlement) will be visited within the first 3-6 months after commissioning to verify whether any unanticipated disturbances are occurring. Based on the feedback received, the need for additional mitigation measures will be assessed and reasonable adjustments implemented in consultation with the affected residents.

In addition, during this phase, direct meetings with households potentially affected by glint and glare from the PV modules will be held to verify absence of glint and glare effects during PVPP

operation or to discuss measures. This refers to five properties located on elevated ground approximately 750 m to the south-east of the PVPP Tucep in Kernine village which would have a direct line of sight to the PV modules, as well as ten properties in Veriq i Ri located at a close distance (up to 150 m to the west) from the PVPP Veriq, where the potential impact of glare cannot be excluded. These households will be visited within 3 months of PVPP commissioning.

Grievance Mechanism. A Project-level grievance mechanism has been established to allow stakeholders to submit complaints, concerns or suggestions related to the Project. Grievances may be submitted verbally (in person or by telephone) or in writing (by email, post or by completing the Project grievance form), without any costs incurred to the complainant. Submissions may also be made anonymously or without the grievance form provided in SEP if preferred.

All grievances will be registered, acknowledged and addressed within the timeframes defined in the SEP. After the start of construction, grievances may also be submitted directly to on-site Project representatives or Contractor, who will forward them to the Borrower for formal processing without delay.

All reasonable efforts will be made to address the complaint upon the acknowledgement of grievance. If this is not possible, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 10 working days upon the acknowledgement of grievance.

At all times, the grievance mechanism will operate without prejudice to the right of affected persons to seek alternative legal remedies in accordance with applicable national legislation.

The following person has been appointed as the contact person for all matters related to stakeholder engagement:

Mr. Arten Bajrushi, AKG SOLAR
E-mail: arten.bajrushi@akgsolar.com
Phone: +383 49 789 907

In addition to the above general grievance mechanism, special arrangements have been made for **GBVH related complaints**. They will be handled through a dedicated safe and confidential process. Complaints can be submitted via standard Project channels or directly to the GBVH Focal Point (the Project E&S Specialist to be appointed before construction). Reports may be verbal or written, including anonymous, without using the standard form and without requiring detailed information or evidence. Access to case information will be limited to a small need-to-know group and recorded securely using non-identifying information only. The Focal Point will agree safe communication, address immediate safety needs and, with consent, refer survivors to qualified services.

GBVH Focal Point (E&S Specialist) – contact details:
Name: TBC (to be appointed prior to construction)
Phone: TBC, E-mail: TBC[3]

[3] This NTS and the SEP will be updated with the confirmed name and contact details once the E&S Specialist is appointed and in any case before construction starts. The confirmed contact details will also be displayed on construction site information boards.

7 APPENDICES

A: Potential Receptors of Solar Reflection (Glare)

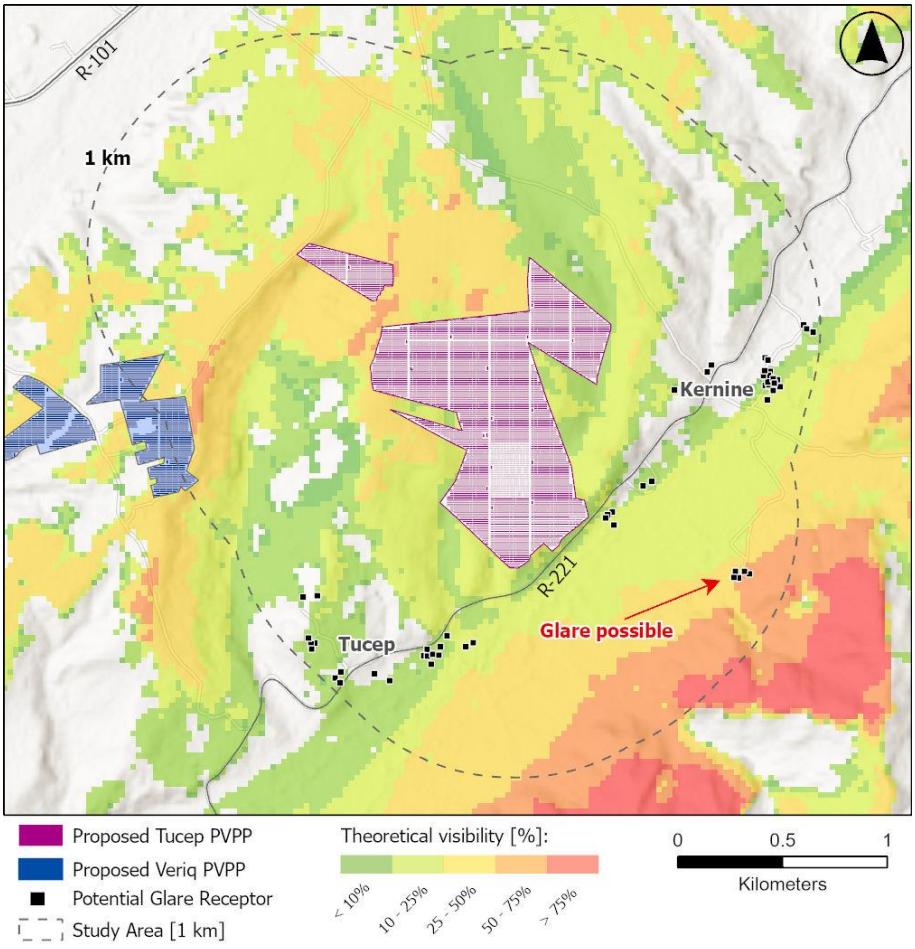

Figure 7-1: Glare receptors of the PVPP Tucep

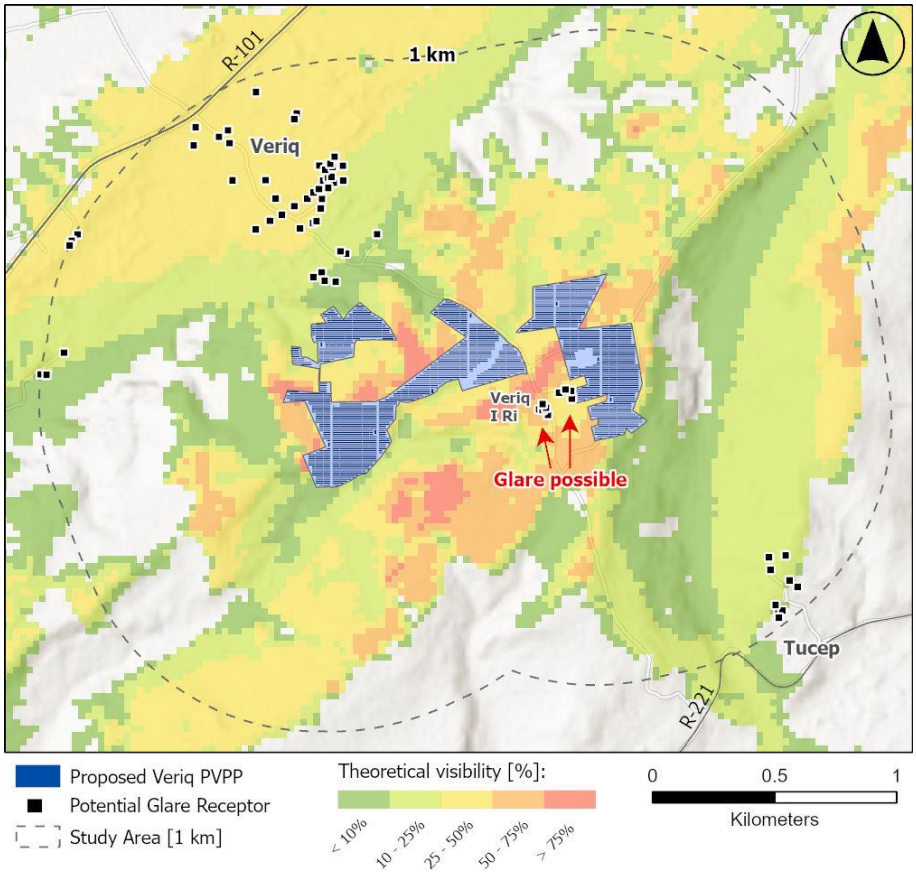

Figure 7-2: Glare receptors of the PVPP Veriq