



SEP

PROJECT: REPLACEMENT OF BUCKET-WHEEL EXCAVATORS IN „MINES MARITSA-EAST“ EAD, BULGARIA



STAKEHOLDERS

ENGAGEMENT PLAN

FOR THE PROJECT:

REPLACEMENT OF BUCKET-WHEEL EXCAVATORS IN

„MINES MARITSA-EAST“ EAD, BULGARIA

PREPARED BY: „MINES MARITSA-EAST“ EAD

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ACRONYMS

SEP	Stakeholders Engagement Plan	RIEW	Regional Inspectorate for Environment and Water
EBRD	European Bank for Reconstruction and Development	BD	Board of Directors
MME	"Mines Maritza East" EAD	ED	Executive Director
ESP	Environmental and Social Policy	ME	Ministry of Energy
NGO	Non-governmental organization	ME	Ministry of Economy
PR	Performance requirement	TPP	Thermal Power Plant
BEH	"Bulgarian Energy Holding" EAD	MEW	Ministry of Environment and Water
RAP	Resettlement Action Plan	IMS	Integrated Management System
LARF	Land acquisition and resettlement Framework	MIFP	Management of Internationally Funded Projects Department

1 Project description

1.1 Characteristic of the project

State-owned company „Mines Maritsa-east” EAD (for short in that document: “MME”) exploits the Maritsa East Lignite Deposit with productive area of lignite fields about 240 km². The main activity of the Company is opencast lignite mining from three open cast mines: "Troyanovo-1", "Troyanovo-North" and "Troyanovo-3". By processing of the extracted coal, about 45% of electricity in the country is produced.

After closure the first four units of NPP Kozloduy /the Kozloduy Nuclear Power Plant/ in 2007, centre of electricity generation in the Republic of Bulgaria became the complex “Maritsa-East”, with over 3300 MW electricity generation capacity. „Mines Maritsa-East” EAD is at the beginning of the technological process of electricity generation by the thermal power plants in the complex, which are the main consumers of the lignite mined by the Company, namely: TPP “Maritsa-east 2” EAD, TPP”AES Galabovo”, TPP “ContourGlobal Maritsa – East 3” AD, TPP ”Maritsa 3” AD Dimitrovgrad and “Brikel” EAD.

In its capacity of an important factor for the economic stability both on regional and national level the coal mining company “Mines Maritsa-East” EAD implements a programme for continuous rehabilitation and modernization of the heavy mining equipment in order to meet the increased lignite consumption and to ensure efficient production and energy independence of the country.

In this regard, the Company has developed and implemented a project for “REPLACEMENT OF BUCKET WHEEL EXCAVATORS IN “MINES MARITSA EAST” EAD, Bulgaria, (for short “Project”), which aims to increase the productivity and energy efficiency and respectively to reduce the energy intensity of the Company. Based on modernization and rehabilitation of the energy production through better using of the local energy resource – lignite coal, in practice the Project contributed to ensure the security of energy supplies.

MME is one of the biggest consumers of electricity in Bulgaria with annual consumption about 600 GWh active electricity. Improvement of energy efficiency by replacing and rehabilitating of heavy mining equipment led to a significant reduction in energy consumption per ton of coal - providing savings of approximately 30 GWh/year, as well as and reduction of atmospheric pollutants. Moreover, the implementation of the Project, which is a part of the Company's objectives for sustainable development, contributes to the provision of:

- Energy independence of the country;
- Security of energy supplies;
- Environment Protection;
- Reduction of carbon emissions;
- Stability of both regional and national economies.

The introduction of new energy technologies and equipment contributes to:

- Reduction of electricity costs;
- Reduction of cost for the coal overburden;
- Reduction of maintenance and service costs;
- Reduction of the amount of annual repairs;
- Reduction of contamination with oils and greases;
- Reduction of emergency downtime;

All these factors result in increase of the efficiency and reliability of lignite production and supply to the above-mentioned lignite consumers, which in turn guarantees the security of electricity supply to end-users in the country.

In addition to Mines Maritsa East EAD own funds, the Project is co-financed by grant funds, provided by the Kozloduy International Decommissioning Support Fund (KIDSF) aimed at reduction of the negative impacts of the closure of units 1-4 of the Kozloduy Nuclear Power Plant (KNPP). The Administrator of KIDSF is the European Bank for Reconstruction and Development (EBRD), and the Project implementation is in compliance with “Environment and social policy” (ESP) of EBRD.¹

To meet the Bank's requirements related to stakeholders engagement and information disclosure, the Company developed and applied the "**Stakeholder Engagement Plan**" (SEP) for the above-mentioned Project. The document presents specific activities that are being implemented or will be implemented in order to manage, promote and encourage engagement by stakeholders. It will be regularly reviewed and updated by MME according to the emerging needs, issues and changes in the course of the Project.

Effective stakeholder engagement contributes to the "social approval" of the Project and depends on mutual trust, respect and transparency in communication between the Company and its stakeholders.

With this regard, a key priority for Mines Maritsa- East EAD is to maintain a transparent and constructive dialogue aimed at providing information and finding solutions to issues raised, identified jointly with the stakeholders, both outside and inside the Company.

The consultations ensure that the interests of key stakeholders are taken into consideration and that all mutually beneficial options are considered, which itself contributes to avoiding or minimizing the social risks from the implemented Project as well as its long-term acceptance by the public.

1.2 Project location

Maritsa East deposit is located about 30 km southeast of the city of Stara Zagora and has an area of about 240 km². In administration terms, the deposit area falls within the Stara Zagora and Sliven regions, and in terms of territory within municipalities of Radnevo, Galabovo, Nova Zagora and Simeonovgrad. (See Annex 1).

¹ <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

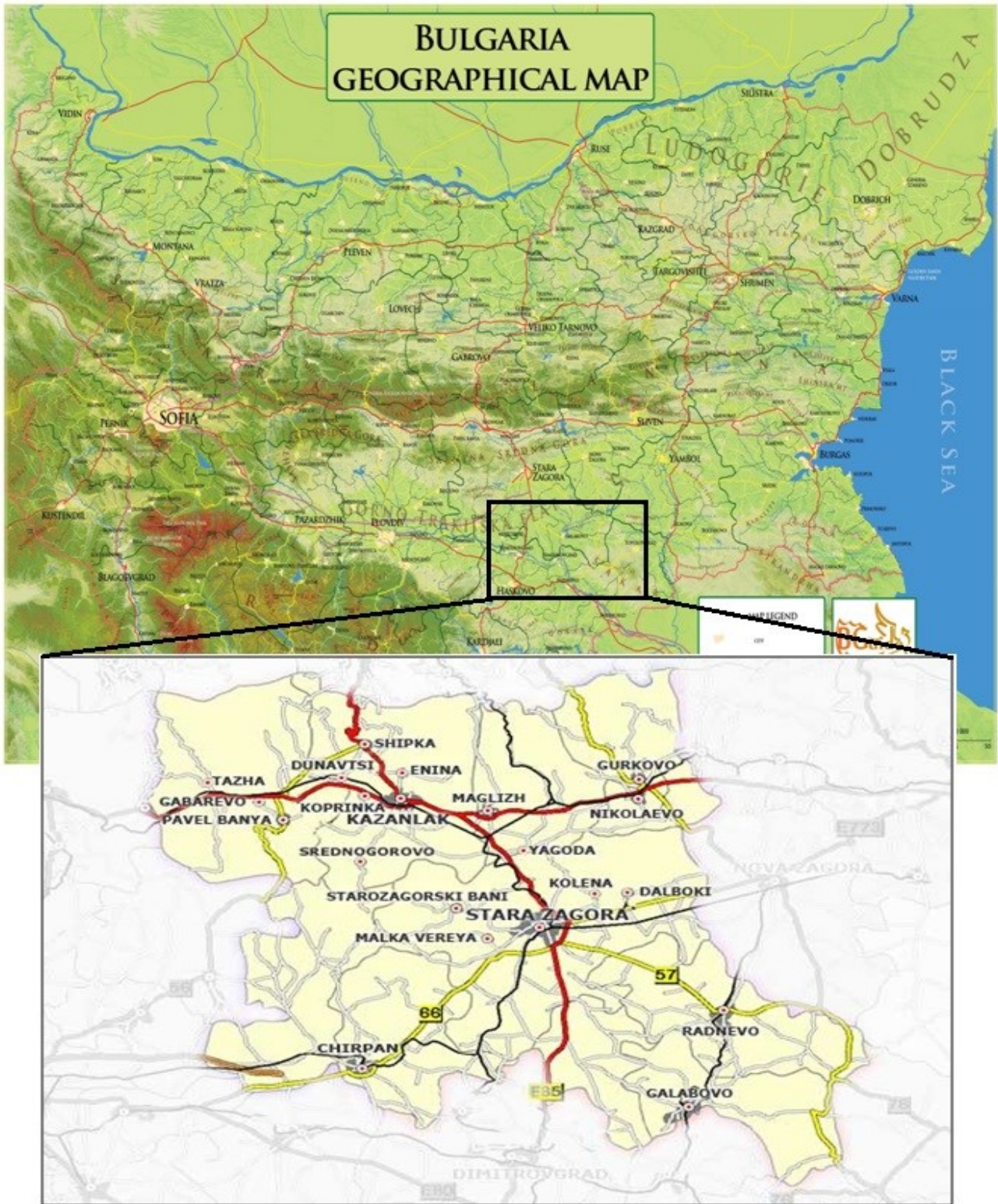


Figure 1: Location of “Maritsa-East” complex

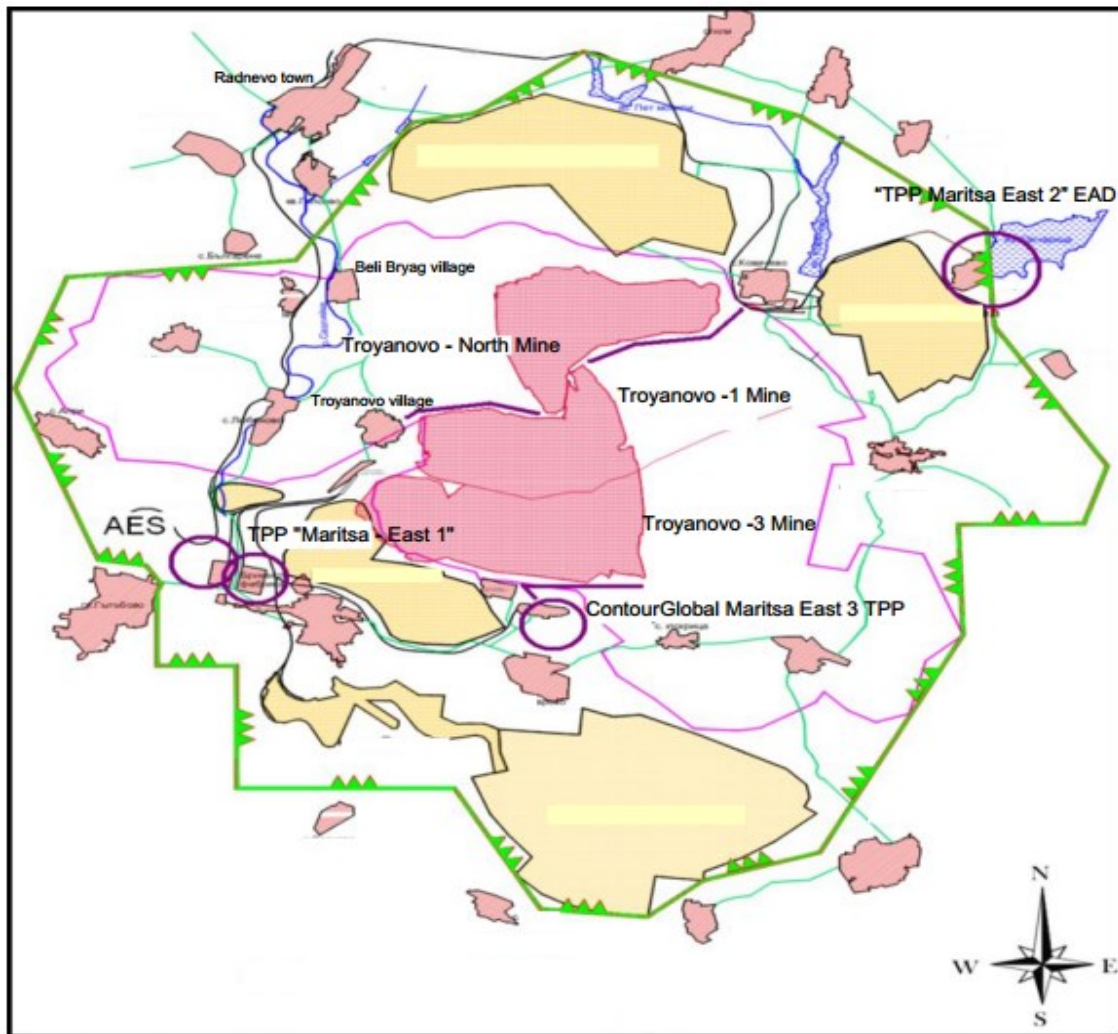


Figure 2: Map of “Maritsa-East” complex

As already mentioned, the closure and the commissioning of the first Units 1-4 of the Kozloduy Nuclear Power Plant in 2007 of the newly built power generation capacity of AES - Galabovo Power Plant in 2010, necessitated reliable supply of primary energy resources to the power generation capacities of over 3000 MW. This determines the implementation of the above Project, which included:

- Replacement of three obsolete bucket-wheel excavator of the SRs 1200 type (built in 1964 and 1965) by one new more productive and efficient bucket wheel excavator of the SRs 2000 type; and
- Purchase of new SRs-200 type excavator for the secondary removal of 50-mln m3 overburden from the internal dumps sites of “Troyanovo-1” Mine.

For the Project implementation a Contract with Ref. № MME/BWE *”Design, supply, installation of equipment, construction and commissioning of a bucket wheel excavator of SRS2000 type and bucket-wheel excavator SRs200 in „Mines Maritsa-east”EAD, Bulgaria“*, was concluded between MME and consortium „FAMUR – BALGARSKA ENERGETIKA” on 20.05.2016.

2 Expected impacts and stakeholder concerns

The operation of opencast mines always involves interference in nature and living space. Therefore, both coal mining and reclamation of the already operated areas are objectives of the same importance for the Company. For people who in the process the mine should yield to coal mining over the decades, it has been necessary. People who have to move in the process of advancing the mining operation in the mine, socially bearable resettlement has to be conducted. It is therefore necessary to implement a set of measures in order to protect and restore the environment in the mining areas.

The impacts are classified as expected social-economic and ecological impacts, identified in the E&S due diligence (ESDD) process, related to labor and work conditions, pollution, health and safety, land acquisition and resettlement or economic resettlement, preserving of biodiversity, nature and landscape conservation, archaeology and cultural heritage.

In terms of environment, the open coal mining inevitably leads to the change in environmental conditions of a number of environment components - landscape, soil and flora, air and climate, surface water and groundwater. The Company is aware of its responsibility to future generations and strictly complies with all environmental regulations and standards in mining activities, so that after completion of mining, the land and landscape can be restored.

As a responsible employer, MME treats its employees with great attention and strictly complies with the requirements of laws and regulations regarding health and safety at work currently in force in the Republic of Bulgaria. In terms of the procedure for issuing permits to implement the Policy of Quality, Environment and Occupational Health and Safety at Work in accordance with the standards, MME has the required certificates and Integrated Management System (IMS).

Risks to humans and environment, associated with production activity, are carefully identified, and then measures are taken to avoid them, where possible, and to limit their impact.

MME has relations with two trade unions: The Confederation of Labor “Podkrepa” and CITUB (the Confederation of Independent Trade Unions in Bulgaria) which sign a Collective Agreement with the Company management. The Agreement is subject to review every two years (in compliance with Article 54 of the Labour Code).

Management of the Company has approved a business strategy which identifies priorities for development related to ensuring sustainable development of the Company and building of conscious behavior in compliance with the safety requirements for continuous improvement of health and safety and continuous reduction of the adverse effects on the environment after mining activities.

2.1 New developments in the light of the European Green Deal

Bulgaria's Recovery and Resilience Plan (RSP), approved in May 2022, envisages phasing out coal-fired power generation in Bulgaria by 2038.

Pursuant to Regulation (EU) 2021/1056 of the European Parliament and the Council dated 24 June 2021 establishing the Just Transition Fund, in 2023 Bulgaria shall edit and update the Territorial Just Transition Plans for the affected areas.

The Territorial Plan for Stara Zagora Region stipulates that the energy transition shall develop gradually over the years, mainly in 2030, with the phasing out of coal-fired power generation activities expected to be completed approximately in 2038. During this period, in the carbon-intensive regions the following developments shall be expected:

- electricity generation from existing lignite-fired capacities is expected to decline steadily, especially in the second half of the decade, as renewables grow. Lignite production is expected to change in parallel with the needs of lignite-fired power plants;

- after 2030, limited use of the available capacities and coal production is expected, which shall be used to meet critical needs for maintaining the national electricity balance under different climate and geopolitical scenarios.

Coal mining, coal-fired power generation (including electricity, heat and steam), delivery of specialized mining equipment and ancillary mining activities are considered to be *declining sectors*, according to the JTF definition requirements.

Transition to a climate-neutral economy in Stara Zagora could affect up to 80% of jobs in mining and coal-based energy generating companies.

It is expected that in 2023 the Territorial Just Transition Plan will be revised and again submitted for consideration by the European Commission.

3 Material issues raised by communities and other stakeholders raised to date

Material issues raised by communities and other stakeholders to date have included the following:

- Land acquisition and compensation (incl. valuation of properties, assets transportation of property owners of Beli Bryag village, road map, resettlement related social package and etc.);
- Beli Bryag graveyard relocation (the procedure of remains relocation)
- Social assistance (donations, financial support)

The implementation of the Project requires some acquisitions of land and/or physical structures potentially causing economic displacement and/or physical resettlement of the villagers of Beli Bryag, as in each case the Company is seeking, that this be done on a voluntary basis as far as possible. A Land Acquisition and Resettlement Framework (LARF) was developed by the Company (link is available in 4.1). A detailed Resettlement Action Plan was prepared in consultation with affected people, was finalized by the E&S Consultant Green Partners, Romania, on the recommendation of EBRD, and was approved by MME's Board of Directors. Copies of this Plan are available in the village of Beli Bryag (at the Mayor's office and at the Initiative Committee), in Radnevo Municipality Mayor's office, as well as in MME's Administrative building (at the Document Registration office, accessible to both employees and outsiders, and in the Company departments responsible for its implementation). In electronic version it is accessible on the Company's official website (link available in 4.1.)

By Decision No. 23-2021/03.09.2021 of MME's Board of Directors, the Company temporarily suspended the acquisition of properties in the village of Beli bryag. This was communicated to the villagers through official letters sent to the village Mayor and the Chairman of the Initiative Committee (Outg. No. OII-01-968/ 14.09.2021). The reason was the reduced coal production, which resulted in reduced revenues for the Company. This required optimization of costs for all activities.

After the temporary suspension of property acquisition in the village of Beli bryag, on 22.08.2022 MME's Board of Directors made a decision to resume the process of voluntary acquisition of properties in Beli Bryag, and the monthly reception meetings in the village (Minutes of Meeting No. 21-2022/ 22.08.2022). This decision was disclosed among the residents of the village through letters sent to the Mayor and the Chairman of the Initiative Committee in the village of Beli Bryag, as well as through notices placed in key places in the village.

On 13.12.2022, the Committee responsible for the issues related to the resettlement of the village of Beli Bryag, at its meeting sought solutions to questions and proposals for updating the Entitlements Matrix in the "Resettlement Action Plan for the village of Beli Bryag", raised in the letter from the EBRD, as well as some problems raised by the villagers. On 21.12.2022, at its meeting, the Board of

Directors of Mines Maritsa East EAD considered the Committee's proposals and made a number of decisions concerning the resettlement process, among which: the decision to start the expropriation process after the end of 2023, as well as additional social measures that will be included in the updated RAP (Minutes of Meeting No. 32-2022/ 21.12.2022).

Together with the purchase of properties and the resettlement of the inhabitants of the village of Beli Bryag another important issue for the local population is the transfer of the cemetery.

The procedure for the relocation of cemeteries is a long and complicated process related to the strict observance of a number of hygienic and administrative norms. It is carried out in accordance with all requirements concerning the management of special purpose terrains such as cemeteries and according to the provisions of *Ordinance No. 2 / 21.04.2011 of the Ministry of Health on the health requirements for cemeteries (cemeteries) and the burial and the and the transfer of the deceased.*

4 Related Company activities so far

The activity of "Mines Maritsa East" EAD is consistent with EIA (1998), is carried out under a concession contract from 2005, and the control over implementation of the policy for environmental protection is carried out and controlled by the Ministry of Environment and Water and relevant government agencies.

The Company has issued two Complex Permits-№ 398-H0 / 2010 and № 403-H0 / 2010 for the exploitation of embankments, where industrial waste from the TPP is deposited and which have the status of landfills for non-hazardous waste..

Information related to all certifications and permits as well as environmental programs are available to stakeholders on the Company's official website: <https://www.marica-iztok.com/page/sertifikati-8-1.html> .

In connection with the social corporate responsibility (SCR) policy of the Company, the following documents have been prepared (See also Annex 2)

4.1 Land acquisition and compensation

People living in the region are in varying degrees in contact with the daily activities of MME. Many of the local residents are employees of MME, or are also employees in other companies, that have contacts with MME.

A Land Acquisition and Resettlement Framework (LARF) was prepared for the land in close proximity to the mining works and the villages of Beli Bryag and Troyanovo. The LARF is duly announced in the Beli Bryag Village, in the Radnevo Municipality, in the MME's administrative building and on the Company's website: <http://www.marica-iztok.com/en/page/land-acquisition-and-resettlement-frameworklarf-80-4.html>

A Resettlement Action Plan (RAP) was prepared by the Company, finalized by the E&S Consultant Green Partners, Romania, and during all that period it was consulted with the PAPs. The RAP was approved by the MME's BD on the 01 of June 2018, and the measures provided therein are implemented by MME before that date. The RAP is duly disclosed in the Beli Bryag village, in the Radnevo Municipality, in the MME's Administrative building and on the Company's website. <http://www.marica-iztok.com/en/page/resettlement-action-plan-rap-for-beli-bryag-village-88-4.html>

A Guide for Land Acquisition and Compensation the village of Beli Bryag had been prepared describing the fundamental rights of resettled persons and measures to reduce the negative impacts of resettlement on them. It contains a chapter with frequently asked questions with answers and explanations.

A copy of the Guide is distributed to each household in the village of Beli Bryag. <http://www.marica-iztok.com/en/page/guide-for-land-acquisition-and-compensation-81-4.html>

In order to maintain constant and good communication with the affected persons, as well as to obtain timely feedback from them, the Company organizes **monthly visits** and meetings in the village of Beli Bryag in the so-called "reception", which the residents have the opportunity to place your requests, share issues, etc. During the COVID-19 pandemic, the reception meetings were suspended in order to reduce the risk of spreading the virus. След приключване на извънредната ситуация, свързана с COVID-19, срещите в приемната в с. Бели бряг бяха възобновени (BD Minutes of Meeting No. 32-2022/ 21.12.2022 г.). After the end of the COVID-19 - related emergency situation, reception meetings in the village of Beli Bryag were resumed.

When necessary, **joint meetings** are organized between the MME Management and the residents, or **face-to-face meetings** are held with the households, as appropriate, to identify their needs, to get acquainted with their problems, and to update the information about the process in general.

In the recent years, as a result of its active communication with the residents of the village of Beli Bryag, the Company has developed and enriched its social policy immensely and has adopted a set of **measures to relieve negative impacts** from resettlement by using the capabilities and powers provided by national law without going beyond their borders. These measures were supplemented by the decisions from the aforementioned Minutes of the Board of Directors No. 32-2022/ 21.12.2022.

Community members are promptly provided with all available project-related and resettlement-related information, in compliance with the principles of transparency and providing access to information.

All the documents developed by the Company (plans, procedures etc.) are also provided to the Community and disclosed on the Company's website.

In 2022, the residents of the village of Beli Bryag were promptly provided with information about the two decisions of MME Board of Directors mentioned above (BD Minutes of Meeting No. 21-2022/22.08.2022 and BD Minutes of Meeting No. 32-2022/21.12.2022), which were related to the resettlement process. In addition to official correspondence, information on issues raised by residents is also provided at MME monthly reception meetings in the village.

4.2 Cemetery relocation

By Order of the Mayor of The Radnevo Municipality on November 17, 2010 the funeral in the cemetery of the village was stopped. All burials from that date onwards are carried out in the cemetery park of the town of Radnevo or in other settlements, at the request of the relatives of the deceased. In accordance with the aforementioned Ordinance No. 2 / 21.04.2011 of the Ministry of Health, the entire relocation of the cemetery of the village can begin not earlier than 8 years after the date of the funeral termination. According to the deputy mayor of the village and an inspection by an expert of "Mines Maritza East" EAD, now about 400 graves in the cemetery of the village are to be moved.

According to the current stage of development of MME's production and technological plans, mining activities are expected to reach the graveyard of the village of Beli Bryag in 2035, which means that the organizing of its relocation will begin no earlier than 2030. Given the remote period and the complete neglect of the village graveyard since burials were ceased in it, which has led to the impossibility of visiting the graves by the relatives of the deceased, Mines Maritza East EAD undertakes to initially clean the infrastructure of the graveyard and to notify the Municipality of Radnevo of the above specified deadlines, so that the Municipality can continue with its care in maintaining the graveyard infrastructure until the time when this area will be required for mining activities.

Construction of an extension to the cemetery of Radnevo.

Although the procedure for closing down and replacement of the cemetery is to be conducted by the Municipality of Radnevo, the company is actively involved in its implementation. As the Leadership

gives a clear account of the emotional aspect of the process associated with the repeated experience of grief for deceased loved ones, the company has already developed and implemented appropriate measures to mitigate the adverse effects of the closure of the cemetery of the village and the necessity of moving it.

With this regard, in 2010, *Radnevo Municipality* and "*Mines Maritsa-east*" EAD signed a contract under which the Company commits to build "An expansion of the cemetery-park within the territory of the town of *Radnevo*" gratuitously on a plot of 15 000 square meters, which is municipal property. Thus, the Company has supported the Municipality, which faces the necessity of new cemetery plots, due to the closure of the graveyard in Beli Bryag village.

The layout of the land plot as a cemetery is carried out entirely at the Company's expense and funerals are already taking place in it. Within the scope of this project, of the following components have been built:

The 2nd stage of the commitment undertaken by MME comprised the implementation of the project for *External power supply and renovation and extension of the existing road*. With this regard, Contract No. MT252/2018 was concluded with the company SM OOD. The project was completed in 2019, fully at the expense of the Company, and was commissioned by issuance of Permission to use No. ДК-07-C3-79/20.09.2019.

The 3rd stage provides for construction of *Memorial hall for funeral service* within the cemetery of Radnevo. *Memorial hall for funeral service* is a building within the cemetery where a funeral (burial) service is carried out with the deceased person's relatives. Currently, there is an existing and operating *Memorial hall for funeral service* within the same cemetery, therefore, there is no urgent need for a second one. Taking into account this, as well as the current financial condition of the Company, the implementation of this third stage is scheduled to take place no earlier than 2026.

Information about the activities and measures related to the closure of the cemetery in the village of Beli Bryag is also available on the MME website (See <http://www.marica-iztok.com/en/page/-93-4.html> and <http://www.marica-iztok.com/en/page/construction-of-an-extension-to-the-cemetery-park-of-radnevo-89-4.html>)

4.3 Social assistance and benefits

(including donations to the community, financial support)

Reimbursement of additional expenses

In connection with the additional costs of the new funerals that will arise to the residents of the village of Beli Bryag for to the ban on burials in the village graveyard, the Company reimburses the additional funeral expenses to the relatives (heirs) of the deceased to the amount of BGN 200 upon of submitting of any documents.

In the process of drafting the RAP and as a result of the meetings with the community, MME has enriched its social policy by adopting a number of measures in favor of the resettlement-affected people. They are applied in the all stages of the resettlement process and are related to: the right to free use of the property for up to 2 years from the date of sale; providing free transportation of the movable property to the new home; payment of the costs of transactions related to the acquisition of new property; research on the real estate market in the settlements preferred by the PAPs and according to parameters set by them, and provision of transport for the PAPs to the identified properties in order to be seen by the PAPs; free legal assistance, etc. More information on these measures is available in Annex 2 below, as well as on the Company's corporate website.

In addition to the measures envisaged to support the resettlement-affected persons, MME carries out large-scale donations as well, through which it supports various organizations and institutions - both local and national.

More detailed information about past regularly activities by donations and financial support of MME's site is available in Annex 3.

(See <http://www.marica-iztok.com/en/page/-93-4.html> and <http://www.marica-iztok.com/en/page/construction-of-an-extension-to-the-cemetery-park-of-radnevo-89-4.html>)

5 Identification of stakeholders

Stakeholder identification is an essential for the proper structuring of the scope of relationships between ME and each stakeholder group. Regular communication is a necessary tool, both inside and outside the company. The objective to familiarize stakeholders with the project being implemented, to provide clarification on emerging issues.

5.1 Principles of stakeholders engagement and information disclosure

MME shares the EBRD statement that the stakeholders engagement is a key part of good business practices and effective corporate responsibility policy. The actual public engagement is essential for the successful management of risks and impacts on the communities affected by the Project.

MME follows a policy of proactive communication policy: active, timely, dialogue-oriented and well-intentioned communication with all stakeholders. The communication process is aimed at the two main groups of stakeholders: internal - members of the Company, and external stakeholders.

Stakeholders engagement is based of principles and values, which are crucial to successful relationships and interaction with them:

- All stakeholders are entitled to receive timely, understandable and adequate public information about the Project;
- All stakeholder can use the special procedure for complaints and grievance – a mechanism that has already been introduced and will continue to operate;
- Regular updates of the SEP and its programme to ensure that these principles are maintained throughout the various stages of project implementation.
- **Transparency and openness to dialogue** – Open and active relations with stakeholders can be maintained when all the issues raised by stakeholders are being considered fast, in transparent and effective way;
- **Commitment and responsibility** – The Company does its best to build and maintain constructive and sustainable relationships with stakeholders who will be affected by the Project. The Company takes measures to monitor and mitigate the potential risks and impacts of the Project;
- **Respect** human rights, cultural beliefs, values and interests of all stakeholders are considered;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate means;
- **Trust** is achieved through an open and constructive dialogue which demonstrates respect for the beliefs of all parties.

Public consultations give the Company the opportunity to gain clarity about the attitude and expectations of people to its Project.

5.2 Objectives of the Stakeholder Engagement Plan (SEP)

SEP is an open and overarching document, which includes project activities related to technical, permits and contracts with external stakeholders as well as actions related to internal stakeholders. It is a management tool that helps the company in planning and implementation of future activities involving them. It helps the Company to manage expectations and reducing the risks associated with project delays, complaints and issues related to Project activities and the Community.

The Plan describes specific measures for disclosure of information to stakeholders on potential environmental and social impacts associated with the Project. This document also contains the

mechanisms provided for stakeholder feedback as well as a grievance mechanism that may arise during the implementation of the Project (See item 7.2. and Annex 4).

The main objectives of the SEP are focused on the following aspects:

- to identify the key Project-affected stakeholders and/or those who could be affected by the Project and envisaged activities;
- to identify the principles for stakeholders engagement ;
- to describe the effective methods and channels for information disclosure ;
- to provide guidance for building of long-term and mutually beneficial relations with stakeholders, based on mutual respect;
- to identify accessible and transparent ways of conducting public debates and consultations, to make the measures implemented by the Company recognizable ;
- to present specific past activities related to stakeholders engagement and to disclosure and exchange of information on the planned future activities;
- to provide details of the formal grievance mechanisms, comments, and suggestions from stakeholders, and establish effective methods for timely consideration of responses;
- to define roles and responsibilities in the implementation of the SEP;
- To define reporting and monitoring approach to ensure the effectiveness of the SEP.

5.3 Stakeholders analysis

Stakeholder identification and analysis completed to date aims to define how MME will be involved the different stakeholder groups and identify the most appropriate methods or consultations with them.

In order to clearly define the stakeholders and outline ways to work with them, MME defines two large groups – internal and external:

- 1. Internal Group-** BEH EAD, MME management, employees, trade unions, contractors;
- 2. External Group** - European and national Government Institutions - EBRD, Bulgarian Government and line Ministries, state Agencies, The Ombudsman of the Republic of Bulgaria, The District Governor, local authorities, communities, media, main suppliers of public utilities, The Community, customers, contractors, media, evaluators, notaries, formal and informal associations /See table 1 below/

Table 1 Project Stakeholders

<u>Affected stakeholders:</u>	<u>Others/Interested stakeholders:</u>
<ul style="list-style-type: none"> • Property owners and local communities in the project area (incl. vulnerable groups) - Formal and informal land owners and users, affected by the Project; - land users; - workers and employees of the landowners and users; - formal and informal associations (Beli Bryag Initiative Committee, Beli Bryag Agricultural Cooperative for Production and Services(ACPS), composed and represented by the affected parties); 	<ul style="list-style-type: none"> • European institutions –EBRD; • National governmental institutions, state agencies and other national authorities; • Company’s shareholders - BEH; • Local and regional authorities; • Local/ regional / national/ international media; • Local businesses – evaluators, notaries; • Local service suppliers; • Local interest groups/associations;

<ul style="list-style-type: none"> • Vulnerable groups in the Project area; • Third party owners of utilities; • MME management and employees; 	<ul style="list-style-type: none"> • National and international NGO's; • Academic and scientific Institutions; • General public;
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All stakeholders are well informed through providing of timely information about the project, through updating of website, sharing of documents, related to the Project (project stage, decisions, LARF, RAP, SEP, etc.). The responsibility for the Company's web site maintenance is taken by MME IT specialist , "Secretariat and communication" Department; Management of Internationally Funded Projects Department.

A summary of past stakeholder engagement with the various groups is presented in Annex 3.

STAKEHOLDERS ANALYSIS (IDENTIFIED STAKEHOLDERS)

Stakeholders	Description of stakeholders	Interest(s) of the stakeholders	Impact assessment/ Brief Methodology	Method of engagement
INTERNAL GROUP				
1.BEH EAD	-a sole owner of the MME capital ; -authorized to make all decisions;	-Successful implementation of the Project; - Provision of the energy independence of the country; - Stability and financial success of the Company;	It has a great direct impact on the Company's activities. High impact, high interest.	- Phone calls; - Reports; - Joint programmes; - Regular meetings;
2. MME management	- MME Board of Directors; -Executive Director; -Deputy Executive Directors; -Managers of branches and structural units;	- Achieving of goof financial result and compliance with regulatory requirements; - Ensurance of the necessary for requires; -Provides necessary resources for organizing of MEE's activity , including suitably qualified personnel;	Strong impact, high interest	- Direct method of communication; - Meetings and decisions of BD; - Operational meetings-weekly, daily; - ED Ordinances ; - Letters
3.Employees	- MME Employees	- Stability of the company and long-term security; - financial success of the Company - good working environment, safe working conditions, good labor remuneration , recreation; - Implementation of the Project;	They have a great direct impact on the Company's activity, both at the individual employee level and as a group.	- Before and during the Project implementation; - MME's website - announcement of information on the Company's website and in the regional daily newspapers; - Internal lines for communication (Acstre

				Office , email); - Letters - Phone calls; - Notice boards; - Meetings;
EXTERNAL GROUP				
1.European institutions	EBRD	Success implementation of the Project in compliance with the requirements set out in EBRD's ESP and the applicable national laws;	Strong impact, high interest;	- Progress reports every three months ; -E&S report – once a year; - Meetings; - Correspondence; - Telephone calls and online meetings
2. Government and line ministries	The Ministry of Energy, The Ministry of Regional Development and Public Works, The Ministry of Economic, The Ministry of Environment and Waters; The Ministry of Labor and Social Policy, The Ministry of Culture, The Ministry of Health, The Ministry of Agriculture,, Food and Forestry;	- Ensuring of energy independence of the country; - Development of the region; - Preservation of the national road network; - Ensuring of employment and better investments; - Environment protection ; observing of sanitary requirements for dustiness, noise, vibrations and others; - Providing of healthy and safe working conditions; - Ensuring of employment; - Preservation of culture heritage in case of a random archaeological finds etc.;	High interest and strong impact;	- Correspondence; - Meetings; - Reports;

3. State agencies and institutions and other;	Ministry of Interior-Traffic police, Irrigation systems, Road Infrastructure Agency, Ministry of environment and waters (East Aegean River basin Directorate), Bulgarian Telecommunication Company, Regional Health Inspectorate (RHI);	<ul style="list-style-type: none"> - Ensuring of security in MME as a site of strategic significance; - Regular payment of taxes, fees and social security contributions; - Monitoring of compliance with the hygiene and health requirements at work etc.; - Monitoring of observation of requirements for use of water bodies - surface waters for discharge of mine waste waters; 	High interest and strong impact; It's clear from the practice.	<ul style="list-style-type: none"> - Correspondence; - Annual reports; - Meetings
4. The Governor of Stara Zagora		<ul style="list-style-type: none"> - Observation of Bulgarian legislation, applicable to land acquisition, migration etc.; 	Medium impact on a local level.	<ul style="list-style-type: none"> - Correspondence when necessary.
5. Local authority	<ul style="list-style-type: none"> - The Mayor of Radnevo Municipality; - Municipal council of Radnevo Municipality; 	<ul style="list-style-type: none"> -MME supports the municipality in terms on infrastructure and culture; - Assistance in case of any problems with Beli Bryag community; -Work with good partnership with MME; 	High interest and strong impact	<ul style="list-style-type: none"> - Correspondence; - Meetings; - Publishing of information on the Company's website and in regional daily newspapers; - Joint initiatives;
6. Community	<ul style="list-style-type: none"> - Project affected people in Beli Bryag village; - The Initiative 	<ul style="list-style-type: none"> - Highest possible price for properties sold to MME; -Clean environment; - Opportunities for economic development and improvement of the livelihood; - Provision of funds for education, sports, social 	Strong impact, high interest.	<ul style="list-style-type: none"> - Meetings with the PAPs - Individual meetings and conversations with individual residents or households with regard to property sale or issues occurred; - Questionnaires/ interviews; - Correspondence;

	<p>Committee in Beli Bryag village</p> <p>- Residents of the town of Radnevo and surrounding villages;</p>	<p>events, etc.;</p> <p>- Donations/ financing of various initiatives, treatments etc. by MME;</p> <p>- Receiving of timely information on vacancies at MME;</p>		<p>- Publication of information on the Company's web site and regional daily newspapers;</p> <p>- Boxes for questions, suggestions, grievances etc., related to the Project, resettlement, mining activities etc., placed in the three mines and in the Administrative building of;</p> <p>- Phone calls,</p>
8. Customers	<p>"Maritsa east 2 TPP" EAD;</p> <p>„Contour Global TPP" Maritsa east 3",</p> <p>- „AES Galabovo TPP";</p> <p>"Brikel" EAD - Galabovo;</p> <p>" Maritsa 3 TPP"AD-Dimitrovgrad;</p>	<p>- Regular supply with lignite for electricity generation;</p> <p>- Compliance with safety requirements and internal rules;</p>	Strong impact and high interest.	<p>- Meetings – when necessary;</p> <p>- Correspondence;</p> <p>- Publication of information on the Company's website and in the regional daily newspapers;</p> <p>- Positive and productive partnerships in donation campaigns etc.</p>

9. Media (national and local)	Newspapers, - TV and radio: - The Maritsa-Iztok newspaper, -The Galabovi vesti; newspaper; - The Capital newspaper; - Stara Zagora TV; - Zagora TV; - Radio Stara Zagora etc.;	- Information coverage of mining sector; - Reflection of events related to the Project and other MME activities ;	Strong impact and high interest. Source of information and role of negotiator, between the general public and the “Mines Maritsa East” EAD	- Direct meetings; - Discussions with management representatives; ; - Reports, documentaries, etc.
10. Academic circles - professors, students	- The Geology & mining university, Sofia; - The Trakya university, Stara Zagora; - The Technical university, Sofia;	- Increasing of popularity of certain careers among students and attracting new students; - Building a strong link between theory and practice; - Conducting of research and tests related to mining activity;	High interest, weak impact;	- Correspondence ; - Consultations; - Meetings and organized visits to the mines; - Students internships ;
	- „Union of Scientists”; - “Bulgarian Chamber of Mining & Geology”; - „Bulgarian Forum of Energy and Mining”	- Interest in implementing projects commissioned by MME; - Increasing the image of the Bulgarian mining industry in the country and abroad;	High interest, weak impact	- Correspondence, communications by phone; - Consultations; - Meetings; - Participation in joint projects; - Presentations and discussions with government, international coal mining associations, and academic circles;

11. Local institutions	<p>The Bulgarian Orthodox Church:</p> <p>Local schools:</p> <ul style="list-style-type: none"> - Occupational school of Mining "St.Ivan Rilski" in Radnevo - Occupational school of electrical engineering "Georgi Sava Rakovski" in Stara Zagora; - Employment Agency etc.; 	<ul style="list-style-type: none"> - Observation of the religious canons of The Orthodox Church at replacement of the cemetery in village of Beli Bryag; - Introducing work in open mines to students; - Building a relationship between theory and practice; - Participation in joint projects; - Assistance to provide quality services, profiled training and qualified staff; - Successful implementation of the dual learning project; 	<p>High interest,</p> <p>no big impact;</p>	<ul style="list-style-type: none"> - Correspondence; - Consultations; - Open days; - Practical training of students under the dual learning project; - Open-air lessons;
12. Evaluators	<p>External evaluation company – "Survey Group" EOOD - Sofia;</p>	<ul style="list-style-type: none"> - Quality implementation of their contract for preparation of real estate valuations in compliance with Bulgarian legislation and Bulgarian valuation standards ; 	<p>High interest and strong impact;</p>	<ul style="list-style-type: none"> - Correspondence; - Phone calls and consultations; - Meetings related to real estate sale; - Visits for property views;
13. Notaries		<ul style="list-style-type: none"> - Providing legality and transparency at concluding real estate transactions for properties acquired by MME; 	<p>Middle impact at local level;</p> <p>Great interest in purchase of properties</p>	<ul style="list-style-type: none"> - Correspondence, - Phone calls; - Meetings;
14. Agricultural cooperatives	<p>„Beli Bryag” Cooperative</p>	<ul style="list-style-type: none"> - Working in good partnership with the Company in order to find opportunities for farming of agricultural properties in the region; - Consideration and making decision on issues related to the resettlement of the village of Beli Bryag and compensation to co-operators; 	<p>Middle impact,</p> <p>High interest</p>	<ul style="list-style-type: none"> - Correspondence; - Meetings-talks between the Company and the Cooperative ; - Publication of information on the Company's website and in the regional daily

				newspapers;
15. Informal interest groups	Various clubs in sports, archaeology, history, mining etc.	- Support for its activities;	High interest, Weak impact.	- Correspondence; - Meetings;
16. NGOs		- Ensuring of legality and transparency regarding the EBRD and the Project activities; - Protection of the interests of property owners in the village of Beli Bryag; - Clean environment and protection of human rights;	High interest, Middle impact.	- Correspondence;

6 Engagement methods

Planned stakeholders engagement programme for 2023.

The table below presents the planned MME stakeholder engagement activities for 2023. It is developed based on the Project implementation deadline and depending on future joint activities. The program will be updated based on needs or at least once a year.

Stakeholders	Type and Method of Communication	Timing
<i>All stakeholders</i>	MME Corporative website of - Updating of website, sharing of Project-related documents	Periodically throughout the year
Internal Stakeholders		
<i>Employees of MME</i>	Internal and external letters, Notifications in Acstre Office Grievance procedure Bulletin boards Union meetings	Prior to and throughout the Project Implementation
<i>Trade Unions</i>	Official meetings; Information on request to union representatives	Throughout the year – when necessary.
<i>BEH</i> - a sole owner of the capital of MME;	Phone calls; Meetings; Joint programmes when necessary	Throughout the year – when necessary
<i>MME Management:</i> - Board of Director of MME; - Executive Director; - Deputy Executive Directors; Directors of Directorates; - Managers of branches and structural units;	Direct method of communication; Meetings; Phone calls; Letters;	Operative meetings – weekly and daily; Meetings – when necessary; Ordinances by the ED – when necessary .
<i>Customers:</i> “Maritsa east 2 TPP” EAD; „Contour Global TPP” Maritsa east 3”, „AES Galabovo TPP”; ”Brikel” EAD -Galabovo; ” Maritsa 3 TPP”AD– Dimitrovgrad;	Meetings; Positive and productive partnerships in donation campaigns etc.;; Letters; Publication of information on the Company's website and in the regional daily newspapers	Meetings – periodically; Publication of information on the MME’s website and in the regional daily newspapers – when necessary ;

External Stakeholders		
EBRD	Correspondence Meetings (including online) Progress reports; E&S reports; E&S Report – once a year; EBRD Meetings with MME-three times per year; General meetings with PCM team, mediator, MME and residents of Beli Bryag village Meetings with mediator and MME	Progress reports – every 6 months; E& S Report – once a year; Correspondence – when necessary; EBRD Meetings with MME – when necessary
Authorities: - National government agencies and other national authorities; - Local and district authorities;	Official correspondence – letters; Reports; Meetings; Project- related Documents;	Throughout the year – when necessary.
Community -People of Beli Bryag village, Radnevo, Galabovo and the surrounding villages	Correspondence; Meetings - timely informing and consulting on issues; Donations /financing of various initiatives, events, treatments etc. by MME; Web site	Individual meetings with households selling their properties; Other meetings and letters – when necessary; Phone calls
Mass media: - Newspapers-”Maritsa-iztok” “Starozagorski novini”, ”Galabovi vesti” - radios – radio Stara Zagora; - Televisions-“ Stara Zagora TV ” and “ Zagora TV ”	Press releases and articles; Participation in TV / radio broadcasts; Announcements / Publications;	When necessary. Announcements / Publications – when important decisions affect the local communities.

In relation to engagement of stakeholders in the EBRD Performance Requirement 10 (PR No.10) of EBRD’s ESP further indicate that the national laws (including those transposing international provisions) on disclosure and public consultation should always be respected. The implementation of the EBRD PR10 aims to complement the national legal framework. (See Annex 5 with applicable national legislation)

MME provides all relevant Project information to the public in Bulgarian and English.

The following documents have been published on the website:

- LARF (Land Acquisition Resettlement Framework);

- RAP (Resettlement Action Plan);
- GLAC (Guide for Land Acquisition and Compensation);
- Grievance Mechanism;

In addition, hard copies of these documents will be available at the following locations:

1. MME Administrative building
2. Mayor's office in Beli Bryag village
3. Municipality of Radnevo
4. Initiative Committee of village of Beli Bryag

7 Monitoring and reporting. Grievance mechanism

7.1 Monitoring and reporting

The Monitoring of the effectiveness of SEP includes tracking of a number of indicators such as:

- monthly reporting of the number of received, solved and unsolved complaints,
- number and type of prepared and disseminated information materials;
- indicators for media information;
- Quarterly reports of number of MME's website visitor-section –projects and others.

This activities is carry out of "Secretariat and Communications" Department with help of experts of the Management of Internationally Funded Projects Department and web specialist. As a part of stakeholder engagement and the consultations with the stakeholders, including of their views in monitoring through the feedback mechanism, suggestions and complaints would improve the effectiveness of their participation.

All engagement activities should be linked to the two parameters: Disclosed/received information/impact and Place and period of disclosure:

Methods of engagements	Disclosed/received information/ impact	Place and period of disclosure
Work meetings		
Management	Daily, weekly	3 months
Employees	Daily, weekly	3 months
MME's web site	Updates of project information	3 months
Meetings		
Meetings BEH and institutions	Number of meetings	3 months
Meetings with PAPs related to evaluations and property acquisition	Number of meetings	3 months
Perform one-to-one meetings with the willing households in the village, to update the information on PAPs needs;	Number of meeting	6 month
The results of meetings with owners of properties	Number of sold properties	3 months
Reports		
Reports to the BEH and other institution	Number of monthly reports	
Reports to the EBRD	progress reports to EBRD	6 months
Grievances		
Internal stakeholders	Number of received, number of solved, number of unsolved complaints	3 months
External stakeholders	Number of received, number of solved, number of unsolved complaints	3 months

Media announcements		
newspapers	Number of announcements	Weekly ,monthly
TV	Number of press releases	Weekly, monthly
Result of mediation mediation results	What is the progress?	3 months

The Company reports annually on environmental and social management issues to the EBRD, summarizing environmental and social impacts of the Project in compliance with the Performance Requirements (PRs) specified in EBRD ESP.

SEP is a document, which is periodically updated during implementation and after completion of the Project. MME will continue to inform the public through its website, the media and in other appropriate ways on all significant project achievements and issues (environmental, H&S and social) as well.

The effectiveness of engagement activities will be evaluate according purposes and tasks, defined in the plan /SEP /. Implementation will be reported to EBRD once a year.

7.2 Grievance Mechanism

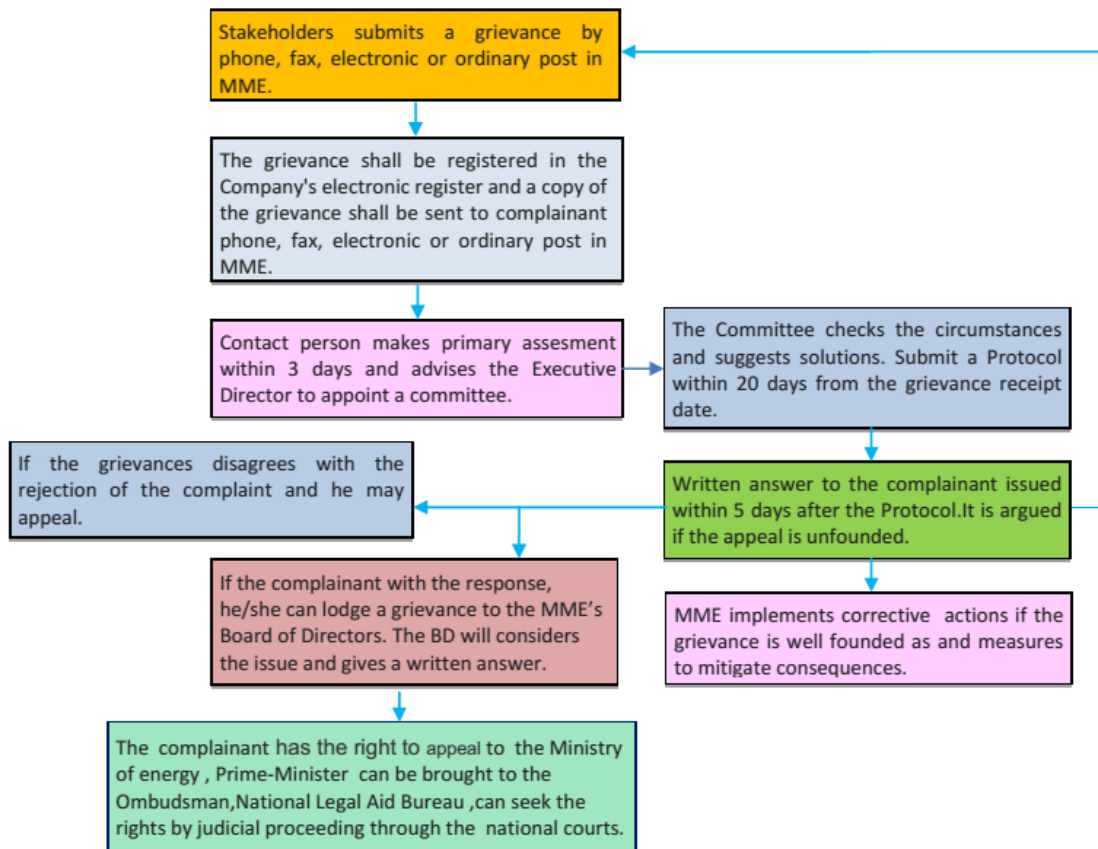
The MME has a developed procedure for dealing with all grievances related to the Project.

The purpose of this procedure is to regulate clear and working rules for interaction between citizens and MME staff and to improve the effectiveness of communication between the parties. The procedure defines the order and responsibilities for filing, registering, processing and responding to requests, complaints, suggestions, reports and inquiries to MME.

The grievance mechanism, apart in the SEP, is also accessible on the corporate website of the Company.

In addition, details of the Company's contact persons responsible for the Grievance Mechanism, are presented in the current document (see contacts Section 7.3 below).

The graph below provides an overview of the Grievance Mechanism for the implementation of the Project.



The process of filing and processing of complaints includes the following steps:

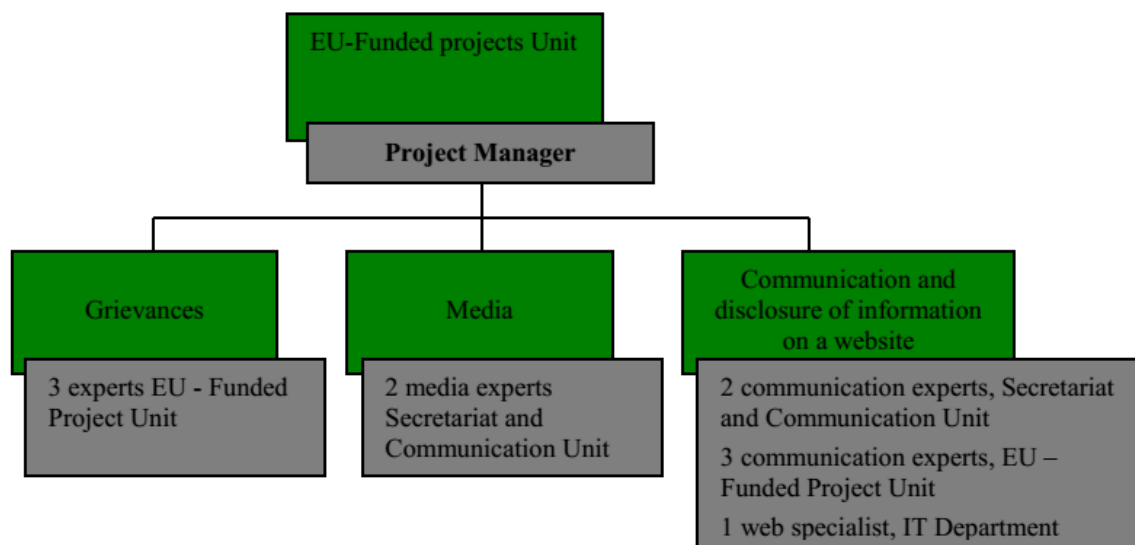
- Any person or institution has the right to lodge a grievance or an alert to the Management, that names or institutions be kept confidential.
- Requests, suggestions and quires can be lodged in MME by phone, fax, and e-mails and as a hard copy, as well as through the four mailboxes situated at the three mines and in the Administration building of the Company. MME has also developed a grievance form approved by the Executive Director –Public grievance form that can be easily filled in. That form for public grievances (See Annex 4) is available for lodging of grievances in the Stakeholders Engagement Plan, and as an electronic version in MME’s website: (www.marica-iztok.com).
- Regardless of the form in which they are submitted, the requests, grievances, suggestions, alerts and queries shall be registered the Company’s electronic registry systems “Acstre–office”, with a unique incoming number and the date of their submission. Anonymous grievances and alerts although cannot be replied to for obvious reasons, never less be investigated and the inspections are carried out. If it has considered necessary, the results of the investigation will be publicly disclosed.
- Once the document is registered in the Company’s registry systems, all applications put in the contact person’s mailbox to familiarize, assessment and referral to the competent officials for assistance or answer by written resolution within 3 days.
- After receiving of grievance or alert (advised by the respective competent person) the Executive Directors should appoint a Committee. In the Composition of the Committee shall in all cases include officials related to the subject matter of the grievance. The Committee has to finalize its investigation in 20 days from the date of receipt of the grievance.

- Based on the findings and recommendations of the Commission, listed in the Protocol, a written response shall be issued to the complainant within 5 days, if the grievance is non-anonymous. If the complaint is found that the complainant is legitimate, measures shall be taken immediately to put an end to the identified illegal activities as well as measures to mitigate the consequences. Appropriate measures shall be taken by received anonymous signal.
- In case of disagreement with the Committee’s response, a recourse mechanism shall be applied. The order of recourse or appeal can either follow the hierarchical order of management of MME (i.e. The Board of Directors, the Bulgarian Energy Holding, The Ministry of Energy ,The Prime-minister),or it can be directed to The Ombudsman, The National Legal Aid Bureau, etc. .People can seek the rights by judicial proceeding through the National Courts.
- “Grievances Register” is registered and maintained by the "Secretariat and communications" Department of MME-Administration Building.

A Grievance Mechanism related to the resettlement is available in the RAP, as well as on MME’s official website (<https://www.marica-iztok.com/page/mehanizam-za-jalbi-vav-vrazka-s-preselvaneto-135-4.html>).

7.3 Roles and responsibilities in SEP implementation

MME is fully responsible for consulting and involving stakeholders in the Project. The following MME structures are directly involved in SEP implementation and monitoring of :



- **Management of Internationally Funded Projects Department** is responsible for the project implementation and management, as well as for the SEP updating . The unit shall have the following responsibilities:
 - Management of all Project aspects and control of stakeholders communication;
 - Coordination of engagement actions;
- **International Programmes and Projects Expert –with the following responsibilities:**
 - Engagement with stakeholders with regard to the resettlement-related issues of the local communities;
 - Updating the SEP annually;

- Updating of the Project stakeholders' register and annual SEP Programme in consultation with the Secretariat and Communications Department;
- **The Secretariat and Communications Department** shall take part in all stakeholder engagement activities.

Internal Information and Communications Expert, Secretariat and Communications Department with the following responsibilities:

- Registration, counting, and reporting grievances and issues raised;

Media Expert, Secretariat and Communications Department shall be responsible for good communication with stakeholders and maintaining of timely feedback with them.

- **Web site specialist**, IT Department shall be responsible for updating of information provided by the abovementioned experts on MME web site.

Contact details:

Responsible persons in MME for Stakeholders Engagement Plan implementation are:

Dilyana Doychinova – Head of “Secretariat and communication” Department;

Phone: +359 886 880 042; e-mail: emilia.ivanova@marica-iztok.com

E-mail: emilia.ivanova@marica-iztok.com

Leonid Ganozliev – Head of “Management of Internationally Funded Projects Department”,
phone: +359 888 188 707

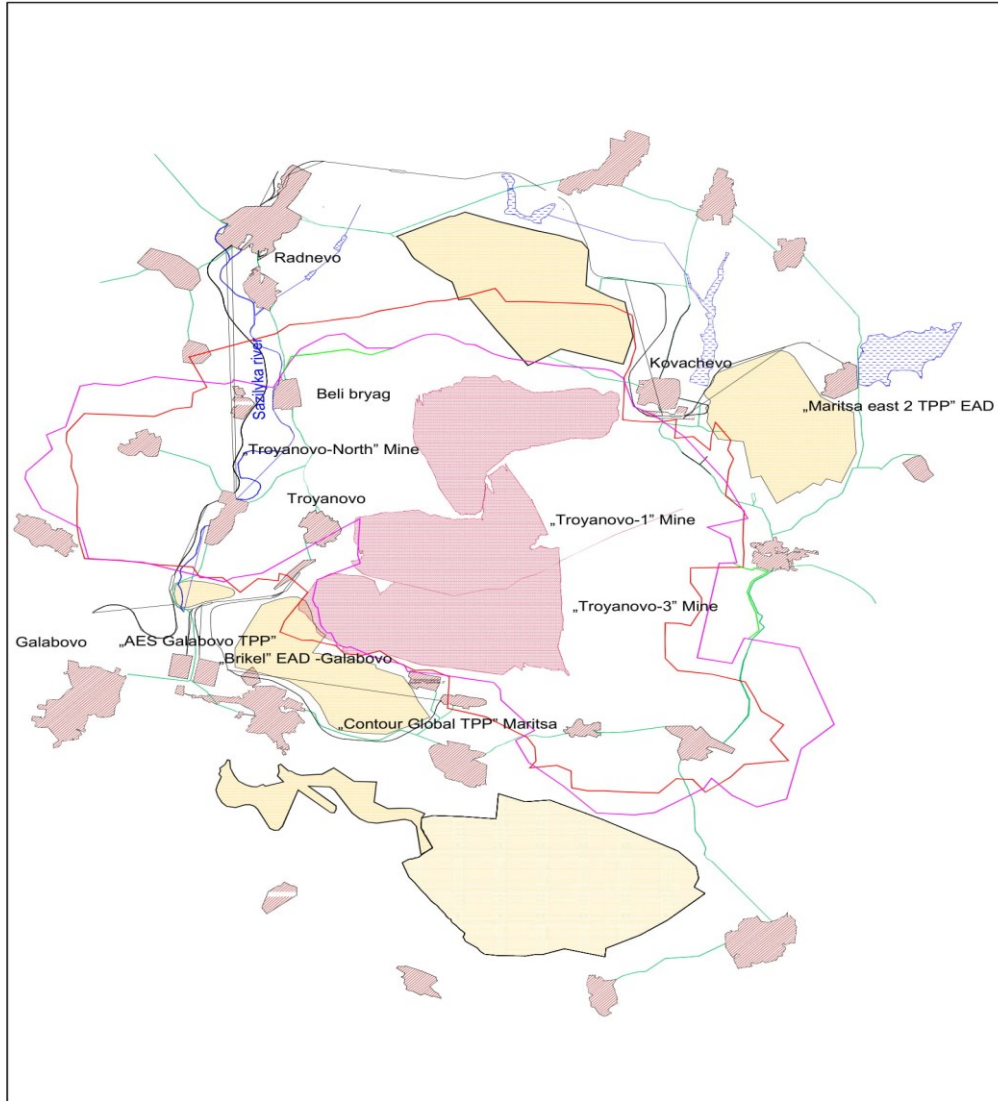
e-mail: leonid.ganozliev@marica-iztok.com

The most important changes in the production process and in the progress of mining operations, as well as environmental and social issues, will continue to be a topic for discussion and communication with stakeholders. All significant issues of this nature will be promptly reported through articles in local media, via internal information materials, meetings, etc. Information will also be published on the corporate website. This SEP will be announced on MME website -<http://www.marica-iztok.com> and will be available at MME Administrative building in Radnevo, 13 Georgi Dimitrov Street.

ANNEXES

ANNEX 1 Location of MME

„Mines Maritsa-east" EAD



ANNEX 2 Corporate policies and the internal Company's documents

The activity of Mini Maritza-East EAD is in compliance with the EIA (carried out in 1998). It is carried out under a concession agreement from 2005, and the control on the implementation of the environmental protection policy is carried out by the Ministry of environment and water and relevant government agencies.

The company has two Complex permits issued – № 398-H0/2010 and № 403-H0/2010 for the operation of dumpsites where industrial waste from thermal power plants are disposed and which have the status of landfills for non-hazardous waste.

Information related to all certificates and permits, as well as environment-related programmes, is available to stakeholders on the Company's official website: <http://www.marica-iztok.com/>.

In connection with the Company's social and environmental policy, the following documents have been prepared:

Documents, decisions of the Board of Directors and orders of the Executive Director

Corporate policy	Brief description	Link
A) Rules for land acquisition, regulation of land plots, resettlement and diversion of infrastructure objects necessary for carrying out MME activities .	It contains all the procedures for acquiring land, properties, land use change, expropriation, etc.	https://www.marica-iztok.com/cms/user/files/proekti/RAP%20ME_FINAL_BG_25%20May%202018.pdf Attachments 5-8
B) Land acquisition and resettlement Framework (LARF).	The LARF was prepared with regard to the need for resettlement of the residents of the villages of Beli Bryag and Troyanovo. It presents the potential impacts on the parties affected because of the progress of mining operations, the principles that the Company respects to mitigate these impacts, and the Company's responsibilities and commitments in the process of resettlement. The LARF was finalized and proved on date of 07 October 2016.	http://www.marica-iztok.com/cms/user/files/ramkov_plan_pr_idobivane_zemia_bg.pdf
C) Resettlement action plan (for Beli Bryag village) (RAP).	RAP has been prepared by MME team and finalized by E&S Consultant Green Partners, approved by the EBRD in compliance with the EBRD's ESP 2014 and was adopted by resolution of MME's BD (MoM №10-2018/01.06.2018). The plan is the base of the relationships between residents of the village of Beli Bryag and MME and describes the engagements, that the Company has undertaken in the resettlement process . With the adoption by the MME's Board of Directors , the Company undertook to observe it. Residents of the village have the right to make claims in case the Company fails to meet its commitments . The Resettlement Action Plan /for the village of Beli	http://www.marica-iztok.com/cms/user/files/infocenter/RAP%20MME_FINAL_BG_25%20May%202018_3.pdf

	Bryag/ is an open and flexible document, which means that changes can be made to it throughout the implementation period initiated by the Company as well as by the stakeholders if there is a legal basis for that reason.	
D) Guide for land acquisition and compensation (2018). It has been prepared in line with national legislations and EBRD's ESP 2014.	<p>The Guide has been created in order to provide clarification of vulnerable groups, on</p> <ul style="list-style-type: none"> -What are the main steps in the process of the resettlement/ compensation process? -To provide answers to frequently asked questions of them; -Price range of agricultural land outside the built-up area of the village of Beli Bryag. 	http://www.marica-iztok.com/cms/user/files/BG%20GLAC%20draft%20Oct.pdf
E) Integrated system for health and safety at work and the environment.	<p>Being a responsible employer, MME pays great attention to its employees and strictly observes the requirements of the laws and regulations currently in effect in the Republic of Bulgaria regarding health and safety at work, aimed at improving the safety culture of employees</p> <p>In 2006, MME implemented the Integrated management System (IMS) for quality, environment and health and safety at work, which was introduced through a Declaration by the management. It unites all the processes taking place in the Company.</p> <p>Since April 2009, the Company has been certified in accordance with the IMS. The priority for the development of the Company is the continuous improvement of the ecological situation in the region by reducing the negative impact on the environment and restoring the ecological balance after the coal mining activities. The implementation of the Policy on quality, environment and health and safety at work is in compliance with the following standards: BS EN ISO 9001: 2008, BS EN ISO 14001: 2005, BS OHSAS 18001: 2007.</p>	<p>Declaration of the management /</p> <p>http://marica-iztok.com/cms/user/files/ISO/deklaraciaa_nodonov.pdf /</p>
F) Decisions of the Board of Directors (BD) and orders by the Executive Director (ED).	An overview of the latest decisions is presented below:	
Minutes of Meeting №23-2010/ 10.12.2010 - BD Decision	Decision of BD in connection of resettlement of the villages and creating of detailed designs for the cemetery and extension of the road to the cemetery and a carpark .	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html
Minutes of Meeting №29-2013/ 27.11.2013 – BD Decision	Decision of the BD for signing a Grant Agreement No. 054 , for replacement of bucket-wheel excavators, between EBRD and MME;	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html

Minutes of Meeting №16-2007 / 06.12.2007г., item.3.2- BD Decision	Decision of MME Board of Directors to determine the maximum purchase prices for the acquisition of agricultural land plots.	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html
Minutes of Meeting №. 21-2016 / 10.09.2016, item 3.6	Decision to provide an option to former owners to use their residential properties purchased by MME in the village of Beli Bryag free of charge for a period of 24 months (grace period) after transfer of ownership. The grace period gradually increased from 3 months in 2009 to 6 in 2010 and ultimately 24 months in 2016.	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html
Minutes of Meeting №13-2017 / 31.05.2017, item 3.2- BD Decision	Decision of the Board that mandates MME to send letters to the owners expressing the need for purchase of their properties (RLPs). The owners shall provide the necessary documents for the preparation of the assessment within a period of one month after they made a decision to sell the property.	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html
Minutes of Meeting No. 13-2017 / 31.05.2017, item 3.2	Decision states that the properties can be evaluated by two valuers. MME will use the services of its previous assessor, Stroyproekt Ltd. Each owner can order a parallel valuation under the following conditions: the appraiser selected by him / her is licensed and the second valuation to be at the expense of the owner.	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html
Minutes of Meeting No. 13-2017 / 31.05.2017, item 3.2	In order to preserve the livelihood of the people, the Board of Directors decided that MME would pay the former owner the value of the production for one year based on documents proving such income from the previous year.	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html
Minutes of Meeting No. 13-2017 / 31.05.2017, item 3.2	Decision that sets the framework for MME to reimburse/pay the funeral expenses, in the amount of up to BGN 200, according to the local legislation.	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html
Minutes of Meeting No. 01-2018 / 12.01.2018, item 3.4	Decision of the Board concerning as follows: the costs of transactions for the acquisition of a new property shall be borne by MME; to include the available Company properties in Radnevo and Galabovo in the list of properties offered as “like for like” compensation; to terminate the process of property purchase in the village of Beli Bryag by the end of 2019; possible increase of the grace period by one additional year (i.e. grace period of three years) for vulnerable persons; option for tenants to apply for a reconsideration of the amount of rent payments; option for vulnerable persons to be enrolled in trainings and qualification courses organized by MME.	https://www.marica-iztok.com/en/page/decision-of-the-board-of-directors-90-4.html

Minutes of Meeting №.05-2019/22.02.2019, item 2.1	Decision of the BD regarding evaluation and cash compensation in case of business closure.	https://www.marica-iztok.com/page/reshen-iia-na-saveta-na-direktoritesd-i-izpalnitelniat-direktor-id--90-4.html
Minutes of Meeting №.05-2019/22.02.2019, item 2.2	Decision of the BD regarding compensation for former cooperative members for losses from rent, shares, dividends and agricultural production, incurred due to the acquisition of agricultural land by MME, and in order to preserve the PAPs livelihood.	https://www.marica-iztok.com/page/reshen-iia-na-saveta-na-direktoritesd-i-izpalnitelniat-direktor-id--90-4.html
Minutes of Meeting №.28-2019/06.12.2019, item 3.9.	Changes in the Entitlements Matrix in the RAP and supplementing of new provisions in case of expropriation.	https://www.marica-iztok.com/page/reshen-iia-na-saveta-na-direktoritesd-i-izpalnitelniat-direktor-id--90-4.html
Minutes of Meeting №.21-2020/21.08.2020, item 3.1.	Decision to postpone the beginning of the expropriation of properties in the village of Beli Bryag for 2023.	https://www.marica-iztok.com/page/reshen-iia-na-saveta-na-direktoritesd-i-izpalnitelniat-direktor-id--90-4.html
Minutes of Meeting №.23-2021/03.09.2021, item 3.5.	Decision for temporary suspension of acquisition of properties in the village of Beli Bryag.	https://www.marica-iztok.com/page/reshen-iia-na-saveta-na-direktoritesd-i-izpalnitelniat-direktor-id--90-4.html
Minutes of Meeting № 21-2022/ 22.08.2022	Decision to resume the process of voluntary acquisition of properties in Beli Bryag, and the monthly reception meetings in the village.	https://www.marica-iztok.com/page/reshen-iia-na-saveta-na-direktoritesd-i-izpalnitelniat-direktor-id--90-4.html
Minutes of Meeting № 32-2022/ 21.12.2022	Decision to start the expropriation process after the end of 2023, as well as additional social measures.	https://www.marica-iztok.com/page/reshen-iia-na-saveta-na-direktoritesd-i-izpalnitelniat-direktor-id--90-4.html

ANNEX 3 Summary of past stakeholder engagement activities

All stakeholder have been well informed by providing constant and timely information about the Project (technical characteristics, Project stage, decisions, LARF, RAP, SEP, etc.) through updating of website, sharing of documents related to the Project. The MME employees responsible for the website maintenance and updating are the website specialists, “Secretariat and Communication” Department; Investment” Department (“EU – Funded Projects” Unit).

Activities – internal group

BEH EAD – There is regular correspondence between the Company and BEH EAD: MME sends reports on the progress of the projects; decisions and statements are agreed with BEH, clarifications and documents are sent on request and others.

Management – BD meetings, technical boards, work meetings (weekly, daily), orders. Provides the necessary resources for organizing the Company activities, including suitably qualified personnel;

Employees – Regular meetings (internal meetings by departments / units, operational meetings); a company newsletter distributed monthly throughout the Company; internal Company events - ceremonies and celebrations on specific occasions; information boards and monitor in information center – a general presentation of production results.

In 2022, the 70th anniversary of "Mini Maritsa-East" EAD was celebrated. Representatives of state and local authorities, national and regional institutions and organizations, Company’s partners, employees and workers participated in a series of initiatives and events.

Photo exhibitions dedicated to the 70th anniversary of the Troyanovo-1 mine and the 60th anniversary of the Troyanovo-North mine were opened, sports tournaments in football and tug-of-war took place, a solemn celebration and a congratulatory concert for the company's employees and the community were organized.

Meetings with veteran miners and arranging of their visits to the mines, as well as financial support for their activities, have become a tradition in the company.

The World Day for Safety and Health at Work 2022 in Mines Maritsa-East was celebrated on April 28, 2022, according to tradition, with laying of wreaths and flowers in front of the monument of workers and employees who died in occupational accidents during the construction and operation of Maritsa-East Mining and Energy Complex in Radnevo.

Trade unions – on the territory of the Company two trade union sections are represented – The Confederation of Labor “Podkrepa” and CITUB. Meetings with members of the trade unions and with the management of the Company, training of the members and celebrating various occasions take place regularly. The routine meetings between the Company’s management and the unions take place every day, and the official meetings between the members and the unions leaderships take place once a month.

In 2022, a new Collective Labour Agreement was signed, which increased the social benefits for the employees of the company.

Clients – MME management considers the requirements of its clients, assess and responds to their needs and expectations by fulfilling their obligations under the contracts signed with them.

Activities – External group

EBRD and E&S Consultant Green Partners – MME sends Progress Reports on projects co-financed under the KIDSF and administered by EBRD. After the completion of the contract under the Project and commissioning of the excavators, MME's reports to EBRD contain only information related to the progress of the resettlement process, which is part of the Environmental and Social Action Plan, and are issued every six months. An Environmental and Social Report was sent in 2022. On ongoing issues, correspondence and telephone conversations are held, when necessary .

Government and ministries- As a concessionaire, the Company has taken some responsibilities and reports to The Ministry of Energy, The Ministry of Environment and Water (with regard to the necessary permits for the work and monitoring), The Ministry of Agriculture and Forestry, Ministry of Regional Development and Public Works, Ministry of Culture, etc.

- Consultations – with representatives of different ministries, government agencies or relevant experts;
- Inspections – The Ministry of Environment and Water, Ministry of Labor and Social Policy, Ministry of Interior (Civil Defense, Regional Agencies on Fire Safety and Civil Protection, Control of Hazardous Materials) and other state authorities inspect compliance with legal regulations and requirements.
- Seminars / discussions on industry and / or ecology topics with representatives of different ministries and regional structures;

State agencies and other government institutions

In connection with its activities, MME sent documents to the competent institutions with regard to issuance of licenses, approvals and permits. communication concerns different stakeholders:

- The Energy and Water Regulatory Commission;
- RIA /Road Infrastructure Agency/;
- National Railway Company– “BDZ” EAD;
- Directorate "Land relations and land consolidation" at the Ministry of Agriculture and Forestry, Stara Zagora Regional Directorate of Agriculture ; The Municipal Office "Agriculture" in Radnevo;
- Irrigation Systems, the Basin Directorate / East-Aegean Region/;
- The Ministry of Health;
- The Ministry of Culture, The Archaeology Museum „Maritsa-iztok” – Radnevo town;
- RDNCC /the Regional Directorate for National Construction Control/;
- Local suppliers of services/utilities (EVN, Vivacom-BTC/Bulgarian Telecommunication company and other);
- The Certification body „TUV Rheinland-Bulgaria”Ltd.

Local authorities – Meetings and official correspondence in connection with specific issues (identification of the owners and land users, relocation of the graveyard, building a new cemetery etc.)..

- Collaboration with Radnevo Municipality in organizing, financing and conducting of various initiatives;
- Joint projects with Radnevo Municipality for public works and infrastructure.

Community – People living in the region are in varying degrees in contact with the daily activities of MME. Many of the local residents are MME employees , or employees in other companies, having contacts with MME.

Local communities are regularly informed about the Company’s activity. Transparency for MME activity and the projects implemented by the Company has been ensured through:

- Issuance of the Company quarterly edition Bulletin "Mines Maritsa-East”;
- Page "The Mines" in the municipal newspaper Maritsa-East" issued by Radnevo municipality;
- Publications in local, regional and national newspapers, televisions and electronic publications containing information about the Company development, greetings for national, regional and professional holidays, Christmas, New Year and Easter, etc.;
- Maintenance and regular updating of the MME website.

Activities implemented by MME for the local communities:

- In 2022, the company provided heavy mining equipment to fight the fires in the Haskovo region.
- Land leveling equipment and 300 cross-beams were provided to Radnevo Municipality for strengthening the riverbed of the Sazliyka River.
- Heavy specialized machines for cleaning the village of Lyubenovo were provided to Radnevo Municipality.
- Donation of BGN 2,000 to the National Association of Volunteers in the Republic of Bulgaria as financial support for the construction of a monument to Yuri Zakharchuk - firefighter of the 20th century.
- The company actively supports and helps in good initiatives for the protection and conservation of biological diversity and flora in the company's area - with the joint efforts of the company and volunteers from the Central Fisheries Protection Organization (CFPO) - Kovachevo dam, the dam was improved and hosted a number of large-scale sports fishing competitions, including the republican championship for the "Bulgaria Cup".

The Information centre (Radnevo, 13, Georgi Dimitrov Street, tel: 0417/8-21-17) – provides information on Company’s current projects and activities. The Information Centre and “Secretariat and Communications” Department staff are the direct link between The Company and the community. Brochures and posters are available to the community. The team organizes events together with local schools, kindergartens or pensioners' clubs, veterans of MME EAD etc.

- In order to provide diverse and convenient channels of communication with the Project affected persons , boxes for all complaints, signals, questions, etc. are placed in the three mines and in the administrative building of the Company , as well as boxes, specifically designated for resettlement-related grievances and issues. A Grievance Mechanism has been developed and published on the MME's corporate website and described under item 7.2 of the current SEP.
- Information boards available to the community – when necessary;
- Informal meetings and conversations;
- Open days – those days are held to allow the community, students and children of the Company's employees to get acquainted with MME activities;
- Financing of social, culture and educational activities related to community benefits;



Media

- Radio Stara Zagora broadcast a 30-minute information block dedicated to the Professional Holiday of miners from Mines Maritza East EAD.
- Financial support to the newspaper "Observer" for the publication of a specialized edition for the Miners' Day 2022.

Academic circles – MME works in co-operation with several universities and organizations (listed in point 5.3). The Company regularly finances conducting of conferences, seminars and provides prize funds.

- The Company has partnership relations with the Thracian University in Stara Zagora for the establishment of the Institute for Sustainable Transition and Development.
- Mines Maritza East EAD has partnership relations with the Union of Scientists in Stara Zagora in the organization and holding of the XXI International Scientific Online Conference.
- Mines Maritza East has partnership relations with the University of Mining and Geology St. Ivan Rilski, Technical University, Bulgarian Chamber of Mining and Geology, TPP Maritza East 2, TPP ContourGlobal and AES in a project to study the feasibility of technologies for capturing, transporting and storing of carbon dioxide in the light of the "Green Deal" and securing the future of the Maritza East complex.
- Mines Maritza East EAD participated with three reports in the jubilee 10th edition of the International Conference on Geomechanics - IGC'2022. The Company is a partner of the scientific forum, which is organized by the Scientific and Technical Union of Mining, Geology and Metallurgy with the support of the Ministry of Energy, Ministry of Economy and Ministry of Environment and Water. Good partnership with a number of secondary and higher education institutions, scientific conferences and forums is a tradition in the Company.
- Provision of out-of-use rubber belt to the Academy of the Ministry of the Interior - Sofia.
- Financial support of BGN 2,000 for holding of the XIV "BULEF 2022 Scientific Conference".
- Donation in the amount of BGN 2,000 for the benefit of "St. Ivan Rilski" University of Mining and Geology for carrying out repair work on 4 / four / laboratories

Local, national and international institutions – MME believes that it is of particular importance to preserve culture and promote the education of younger generations. In this connection, very close relations with the elementary schools and the vocational high school in the town of Radnevo are maintained:

- Joint initiatives and events;

- ensuring financial support for local schools in order to increase the school environment quality;
- Open days for outdoor lessons for all students and teachers who show an interest;
- Mines Maritza East EAD made a presentation of the Company on the „Open Day 2022“ organized by University of Mining and Geology St. Ivan Rilski.
- The Company regularly donates books to schools and libraries to celebrate national holidays;
- At the invitation of MME, theatre groups visit the town of Radnevo;
- The Company presents mining professions on the schools/ universities presentations for secondary and higher education.
- Mines Maritza East EAD took part in the Regional Panorama of Vocational Education and Training and Career Guidance 2022, which was held for the ninth time in Stara Zagora and Radnevo.
- Dual education is organized annually for students from the “St. Ivan Rilski” Vocational Highschool in Radnevo.
- The Company conducted vocational guidance for students from 6 schools in the Municipality of Radnevo, as part of its commitments as a partner in their dual education.

By investing in young people, the company strives to meet the requirements of the labor market and attract them with its responsible social policy and development opportunities.

- At the beginning of April, a trial internship was held for students of the dual education system from the Occupational Highschool "St. Ivan Rilski" in Radnevo and the Occupational Highschool of Electrical Engineering "G. S. Rakovski" in Stara Zagora.
- "Mini Maritsa-iztok" EAD is a partner in Project BG05M2OP001 - 2.014-0001 "Support for the dual education system" and in the implementation of Sub-activity 3.1 - "Providing support for students from the first high school stage in a dual education system, through participation in trial internship in a partner company", 81 students spent several days in the rhythm of everyday work - with colleagues, mentors, tasks and responsibilities. All students were provided with personal protective equipment, work clothes and free transportation.

Cultural institutions are supported to preserve culture and folk customs

- MME took part in the campaign "Bulgarian Christmas", supports the initiatives of municipalities, holding of festivals and cultural events, and responds to the requests for financial supports to churches and other institutions.
- Celebrations of national and regional holidays with local communities, preserving patriotism and spirituality.
- Purchase of tickets for a show at the "Sparks and Seasons" theater - BGN 2,000;
- Mines Maritsa East EAD provided an amount of BGN 2,000 to financially support the publication of a book - a luxury edition dedicated to the legendary Thracian singer Orpheus;
- Purchase of tickets worth BGN 2,000 for the performances of the State Opera Stara Zagora "The Queen of Chardash" and "Christmas Concert".
- Financial support in the amount of BGN 1,000 for the celebration of the Rose Festival – 2022.

Church

- The company continued the tradition of holding a children's Orthodox camp, organized jointly with Stara Zagora Bishop's Residence, in the Company's holiday centre in Stara Zagora Mineral Baths.

- In the month of October, in the presence of His Eminence, Bishop of Stara Zagora, Cyprian, a ceremony of blessing was held at the Architectural Memorial Complex "St. Ivan Rilski" – Radnevo, and a retrospective exhibition was opened in honor of the saint, with photographs showing the construction of the complex.
- Donation to Creative Team "Rodolyubie" in the amount of BGN 2,000 as financial support for the creation of a documentary dedicated to the 120th anniversary of the "Nativity of Christ" temple-monument in Shipka, commissioned by Cyprian, Bishop of Stara Zagora.
- Provision of accommodation and food for 30 Orthodox youths in Maritsa-East, Stara Zagora Mineral Baths, in connection with the II National Meeting in Stara Zagora;
- Financial support for the construction of the chapel "St. Georgi Pobedonosets" Stara Zagora - BGN 2,000;
- A sum of BGN 2,000 for the purchase of coal for heating during the winter season of Shipka Monastery "Holy Nativity" - town of Shipka;
- Mines Maritsa East EAD provided "St. Ivan Rilski" University of Mining and Geology, Sofia, with an amount of BGN 2,000 as financial support for the construction of the "St. Ivan Rilski" temple within the university campus.
- Donation of BGN 2,000 for the construction of the newly built church "St. Tryphon" in the village of Malka Vereya, Stara Zagora region.

Informal interest groups (sports, archaeology, history, etc.):

Sport

MME supports sports clubs and events. For 2022, financial support was donated for the following events and organizations:

- Two employees of the Company won silver medals in the 2022 Marathon, which took place on April 3 in Stara Zagora. They competed in the 45+ /veterans/ category.
- Football players and tug-of-war competitors from the teams of Mines Maritsa-East EAD took part in a competition with their colleagues from TPP Maritsa East 2 EAD on the occasion of Day of people working in the Energy sector, confirming the good partnership on the professional and sports field.
- The athletes from Mines Maritsa-East EAD won third place in the complex ranking of Bulgarian teams for the Trade Union KNSB Cup. The eighteenth edition of the Workers' Sports Festival, with international participation, which was held from June 15 to 19 in "St. Constantine and Elena" Resort Complex.
- The team of Mines Maritsa-East EAD ranked second in the Third Edition of the Open Sports Games of Industrial Workers, which took place from September 10 to 14, 2022.
- In the month of November, the sports orientation competitions for the Trade Unions "KNSB" and "Podkrepa" Cups, as well as the State Championship for Workers and Employees - 2022 were held in the "Stara Zagora Mineral Baths" competition center. The representatives of the "Maritsa-East" team competed individually and as a team, ranking at winning positions.
- Financial support to the Non-Profit Association "Firesport" Stara Zagora for the participation of the club in the national review of fire-fighting sports and other tournaments in 2022 in the amount of BGN 1,500.
- Financial support to the "Compass" Route Orientation Sports Club in Radnevo for its activity and holding of the traditional 35th Route Orientation competition – BGN 1000;

and BGN 1900 for for organizing and holding of State Championship for employees and workers, for "Podkrepa" MME Cup and "CITUB" MME Cup.

- Providing the Chess Club "Maritsa East" in Radnevo with an amount of BGN 2,000 for the purchase of chess clocks and chess sets in connection with the celebration of the club's 60th anniversary

Archaeology

- The Company has concluded a contract with the Archaeological Museum "Maritza-Iztok" in the town of Radnevo. All the activities for the discovering of accidental archaeological finds during mining works are sponsored by MME.
- The anniversaries of both Mini Maritsa-Iztok EAD and Maritsa- Iztok Archaeological Museum were celebrated with a jubilee exhibition. The exhibition presented photos, documents and awards from the company's 70-year history, the jubilee 5 000 000th and 10 000 000th briquettes.

MME maintains and supports the only in Bulgaria **Club of Veteran Miners**.

- Financial support to the "Veterans Miners Club" in Stara Zagora to celebrate the professional holiday of miners ("Miners' Day") in PS "Maritsa East" in the village of Stara Zagora Mineral Baths.
- Accommodation, swimming pool and the facilities in the rehabilitation center in "Maritsa East" Holiday Home in Velingrad were provided to the Miner's and Energy Club" in Galabovo for free use for two days.
- The amount of BGN 500 was provided to the "Miner's and Energy Club" in Galabovo to celebrate the professional holiday of miners August 18 ("Miners' Day").
- Financial support to the "Miner's and Energy Club" in Galabovo in the amount of BGN 1,000 and free accommodation in the Company's rest and rehabilitation facilities in Velingrad for 50 members of the club; support to the Non-Profit Association "Miners' Club - Veterans" in Stara Zagora - BGN 2,000. , and provision of free transport for the "Veterans' Club" in Radnevo.

With care **to disadvantaged people**, in 2021 the Company donated funds to support to the "Municipal Organization of the Union of the Disabled People in Bulgaria" in Radnevo.

- Financial support for the activities of the "Municipal Organization of the Union of the Disabled in Bulgaria" in Radnevo - BGN 2,000.
- The management of the company took care of the pupils from the family-type accommodation center for children without disabilities - Radnevo, for whom backpacks and study aids were purchased. A weekend was organized and held for them at Maritsa-Iztok Recreation Complex at Stara Zagora Mineral Baths.
- Providing of BGN 1,000 to the Saint Nicholas National Fund as financial support for the organization of a Christmas charity campaign in support of disadvantaged children and adults housed in social institutions;
- An amount of BGN 2,000 provided for the "Bulgarian Christmas" charity initiative.

In addition, MME organized and financed a number of events aimed **at assisting local communities or individuals**.

- Mini Maritsa-East EAD joined the campaign in support of 38-year-old Monica Marinova, little Dimitar Kararalev and in raising funds for the wife of a Company employee, who was seriously injured in a road accident.
- Financial support to the "Samaritans" Association - a sum of BGN 2,000 to support the organization and holding of the "Good Samaritan" Annual Awards Ceremony.
- A total of BGN 17 260 were donated for life-saving operations and treatment of the Company employees and/or members of their families in 2022.

ANNEX 4 Public grievance form

TO

the EXECUTIVE DIRECTOR

OF MINES MARITZA EAST EAD

Reference No:	
Full Name (optional)	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____
	<input type="checkbox"/> By Telephone: _____
	<input type="checkbox"/> By Email: _____
Description of Incident or Grievance:	
What happened? Where did it happen? Whom did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> Single incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing a problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to:

Attention:

Postal Address:

Telephone:

E-mail address:

ANNEX 5 Applicable national legislation

As an EU member state, Bulgaria implements EU regulations and its national legislation is harmonized in line with the EU legislation. As the overall activity of MME, the implementation of the Project is in full compliance with the following laws and regulations:

- The Constitution of the Republic of Bulgaria –provides that: "Everyone has the right to seek, receive and spread information. The realization of this right cannot be directed against the rights and reputation of others, as well as national security, public order, public health and moral (Article 41. (1)).
- Environment Protection Act – One of the main principles of the Environment Protection Act is to ensure public participation and transparency of the environment decision-making process (Article 3 of the EPA). Everyone has the right to access the available environmental information without having to prove a specific interest (Article 17 of the EPA).
- The Access to Public Information Act.
- The Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters
- The Energy Act;
- The State Property Act;
- The Concessions Act;
- The Subsurface Resources Act;
- The Spatial Planning Act;
- The Protection for Personal Data Act;
- The Purity of the Atmospheric Air Act;
- The Water Act;
- The Waste Management Act
- The Agricultural Land Protection Act ;
- The Forest Act;
- The Ownership and Use of Agricultural Lands Act;
- The cadastre and land registry Act;
- The the Personal Data Protection Act;
- The Local Self-Government and Local Administration Act;
- The Protection from Noise in the Environment Act ;
- The Ordinance on the Terms and Procedure for Issuing Complex Permits;
- Ordinance №6 / March 26, 1999 on the order and method of measuring the emissions of hazardous substances released into the ambient air from sites with stationary sources ;
- Ordinance №7 / May 03,1999 on the assessment and management of ambient air quality;
- Ordinance №14 / September 23, 1997 on the Limit Permissible for Concentrations of Hazardous Substances in the Atmospheric Air of the Settlements;

- Ordinance №1 / April 11, 2011 on water monitoring ;
- Ordinance on the use of surface water ;
- Ordinance №1 / October 10, 2007 on exploration, use and protection of groundwater;
- Ordinance №2 / June 08, 2011 on issuance of permits for discharge of waste water into water bodies and determination of the individual emission limitations of spot sources of pollution ;
- Ordinance №2/ July 23, 2014 on Waste Classification;
- Ordinance on the requirements for treatment and transportation of industrial and hazardous waste, adopted by Decree of the Council of Ministers No 53 /March 19.1999;
- Ordinance on electric and electronic waste (adopted by Council of Ministers Decree No 256 of November 13, 2013) ;
- Ordinance №7 / August 24, 2004 on the requirements to be met by the sites for placement of facilities for waste treatment ;
- Ordinance №6 / August 27, 2013 on the conditions and requirements for construction and operation of landfills and other facilities and installations for recovery and disposal of waste) ;
- Ordinance on the procedure and manner of storage of dangerous chemical substances and mixtures;
- Ordinance №.6/ June 26, 2006 on environmental noise indicators, taking into account the degree of discomfort during the various parts of the day, the limit values of the environmental noise indicators, the assessment methods of the noise indicator's values and the harmful effects of noise on public health ;
- Ordinance № 54/ December 13, 2010 on the activities of the national system for monitoring of environmental noise and the requirements for conducting self-monitoring and provision of information from industrial sources of environmental noise ;

EBRD requirements

In its ESP, the EBRD stipulates a number of requirements for the process of interaction with stakeholders, considering the stakeholders engagement an essential part of good business practices and corporate responsibility.

In particular, the real public engagement is essential for the successful risk management and the impact on project-affected communities , as well as achieving of greater benefits to the Community (EBRD's Performance Requirement № 10 (PR10 of ESP) "Disclosure of information and interaction with stakeholders") aimed to **(a)** reduce or eliminate negative environmental or social impacts associated with the project implementation, and **(b)** providing the most accurate picture of the project by stakeholders.

According to EBRD, stakeholders engagement is essential for building strong, constructive and responsible relationships, which are essential for the successful management of the project's impact on the environment. PR 10 aims:

- To describe a system approach by building and maintaining of constructive relations with stakeholders and especially with communities directly affected;

- To ensure adequate interaction with stakeholders directly affected by the Project, access to timely, relevant, understandable, accessible and meaningful environmental and social information, in an appropriate cultural manner and without manipulation, interference, coercion and intimidation;
- To consider specific actions to remove possible barriers to vulnerable groups for their involvement in the engagement process;
- To provide an effective procedure or mechanism for people to be able to express opinions or submit complaints and grievances;
- To ensure that grievances from affected communities and other stakeholders receive an appropriate response and are correctly addressed;