

# **Dama Solar Power Project**

Livelihood Restoration Plan (LRP)

March 2026

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# Executive summary

## Introduction

The Dama Solar Power Project comprises a 1044MW solar PV plant in Arad County, Romania. This Livelihood Restoration Plan (LRP) covers only the grid connection components of the project: the 3.6km 400kV underground cable and the Interconnection Substation (ICS) “Grăniceri.” The cable will be laid entirely under an existing agricultural road and public land, with no private land acquisition required. No physical displacement will occur, and impacts are limited to temporary access restrictions to pastureland and agricultural access roads construction.

This LRP has been prepared to meet the International Finance Corporation (IFC) Performance Standard 5 and the European Bank for Reconstruction and Development (EBRD) Performance Requirement 5, addressing gaps in Romanian law including livelihood restoration and grievance mechanisms. The Project commits to avoidance-first activity scheduling, compensation for income impacts, and a project-level grievance mechanism to ensure compliance with lender standards.

## Stakeholder Engagement, Grievance Mechanism & Impact Assessment

Building on the ESIA consultations, LRP-specific consultations were undertaken in October 2025 with local authorities, agricultural institutions, and the two directly affected households (DAH-1 and DAH-2), including in-depth household interviews on 29 October 2025 to inform PAP identification, potential impact assessment and avoidance-led access and scheduling measures.

A Public Information Brochure was disclosed during meetings, and a grievance mechanism is operational, offering multiple submission channels and a 30-day resolution target. The LRP will be disclosed in Romanian and English at the Town Hall and online, ensuring transparency and accessibility.

The consultation and affected peoples’ surveys confirms that two pastoral households - sheep and cattle farmers - will be directly but temporarily affected. As detailed in the LRP baseline, both rely on pastureland intersected by the cable route. Approximately twenty farmers and agricultural road users may also experience indirect impacts in the form of short-term inconvenience during construction. Permanent land take is limited to 3.3ha for the ICS Substation on unproductive communal land, with no livelihood impacts. In summary, livelihood impacts - primarily related to access restrictions - are expected to be temporary and reversible and therefore will not be significant. No directly affected vulnerable households were identified during the assessment.

## LRP Policy, Eligibility, Entitlements & Livelihood Restoration Strategy

The Project commits to implementing this LRP in full compliance with IFC Performance Standard 5 and EBRD Performance Requirement 5. These standards require that land acquisition and related restrictions avoid or minimise displacement wherever possible, ensure compensation at full replacement cost, and maintain transparent, inclusive engagement. The Project will apply these principles through impact avoidance as the primary strategy, supported by fair compensation, accessible grievance mechanisms, and monitoring to verify outcomes. Livelihood restoration and special measures for vulnerable groups will be provided if avoidance cannot be fully achieved.

LRP eligibility is based on the affected peoples census and impact surveys completed during the LRP preparation. Categories include directly affected households, indirectly affected farmers and road users.

### Summary entitlements matrix

Impact Type	Entitlement
Temporary grazing access loss	Avoidance through winter scheduling; if unavoidable: cash compensation (€0.55/sheep/day; €2.50/cow/day; €100/day labour), pasture restoration, subsidy reimbursement
Agricultural road access restriction	Advance notice, traffic management, full restoration (no graveling) Temporary alternative routes will be identified and agreed in consultation with indirectly affected road users
Indirect disturbance	Advance notice; access to grievance mechanism
Unforeseen impacts	Case-by-case mitigation and compensation, including additional targeted assistance if monitoring/GRM identifies vulnerable impacted households or individuals.

The livelihood restoration strategy prioritizes avoidance through winter scheduling (November–February) and includes contingency compensation if avoidance fails. Additional measures include commitments to ring fencing a contingency budget for income loss deterioration, pasture restoration, subsidy protection and full restoration and improvement of agricultural roads. A formal cut-off date has been established as 31 October 2025 and will be communicated during LRP disclosure (tentatively scheduled for February/March 2026), including through the Public Information Brochure.

### Implementation, Schedule & Budget

Construction will start after disclosure of the LRP in Q1 2026 and be staged in segments of up to 1km if it starts during winter months to avoid grazing and agricultural seasons. Completion is expected in Q1 2028, to be verified by the Lenders’ Technical Advisor. The ring-fenced LRP implementation budget is capped at €37,400, covering compensation contingency subsidy protection, land rehabilitation, engagement, and monitoring, and includes a 10% contingency for unforeseen impacts.

### Monitoring & Completion

Monitoring will track restoration of grazing and road access, subsidy protection, and PAP satisfaction. Monitoring will follow a time-bound plan, including pre-construction baseline checks, monthly monitoring during construction, quarterly post-construction monitoring, and final livelihood verification six months after completion of land reinstatement and access restoration.

External verification will be conducted by the Lenders’ Technical Advisor. Livelihood restoration will be deemed complete when access is restored, compensation (if any) paid, and affected households confirm satisfaction.

# 1 Introduction

The Dama PV Project (or Project) involves the development of a 1044MW solar PV plant located in the West of Romania, in the North-Western area of Arad County and near the border with Hungary. The Project Company responsible for managing all phases of development, implementing, permitting, construction and operation of the plant is West Power Investments SRL (WPI, or Project Company). WPI operates under the strategic ownership and direction of Rezolv Energy (or Sponsor).

The land acquisition process will be aligned with Rezolv Energy's Sustainability Strategy and the Project will seek finance from institutions which abide by the Equator Principles. As well as being developed in compliance with Romanian legislation requirements, the Project will conform to the good international industry practice (GIIP) international sustainable finance standards of the European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC, see chapter 4 for further details).

This Livelihood Restoration Plan (LRP) has been developed to meet these requirements. Specifically, the LRP assesses and provides a plan for the mitigation and management of the economic displacement and livelihood impacts expected by the Project's Grid Connection Facilities, including a 400kV underground power line that is 3.5 kilometres long and Project's Interconnection Substation (ICS) "Grăniceri".

This report is a lender-grade LRP incorporating commitments to an eligibility framework and entitlements matrix to avoid and compensate livelihood impacts. The LRP's main aim is to outline measures to assess and ultimately avoid, mitigate and manage economic displacement impacts, while acknowledging current uncertainty regarding the exact scale and nature of these impacts. The document is based on defined assumptions and excludes physical displacement impacts of which there will be none. It is closely linked to the ESIA and land acquisition processes, the outcomes of which will be used to inform and refine implementation.

This report is structured according to the following chapters.

1. Introduction
2. Project description and LRP scope
3. Approach and methodology
4. Regulatory and policy framework
5. Stakeholder engagement and grievance mechanism
6. Socio-economic baseline
7. Impact assessment
8. LRP policy, eligibility and entitlements
9. Livelihood restoration strategy
10. Implementation arrangements, schedule and budget
11. Monitoring, evaluation and completion

The affected peoples sand impact surveys questionnaire and stakeholder targeted consultation questions are presented in annexes at the end of this report.

## 2 Project description and LRP scope

### 2.1 Project description

The Project is designed to connect 1044MW of active power to the national grid, with a total installed capacity of approximately 1.25 - 1.3 GWp. The project footprint spans around 1064ha across the Grăniceri and Pilu communes and comprises the solar PV plant and associated grid connection infrastructure, including the Main Step-up Substation (MSUS) "Arad," the Interconnection Substation (ICS) "Grăniceri," and two 400kV underground power lines of approximately 3.6km connecting these substations.

The grid connection will link to the Nadab-Bekescsaba 400kV overhead transmission line operated by Transelectrica S.A., ensuring integration into Romania's high-voltage network. The PV plant will use bi-facial 580 Wp modules mounted on fixed structures tilted at 19° south, grouped into nine sections of roughly 118 MW each. Power will be collected through low-voltage DC circuits, converted to AC via string inverters, and stepped up through LV/MV and HV substations to 400kV for transmission. Underground cabling will follow internal roads and existing dirt tracks to minimize surface disruption, and land will be reinstated after installation.

Construction is expected to start in February 2026, with a phased schedule over 2.5 years and partial commissioning after 10 months. The operational life of the project is estimated to be 25 years. Supporting infrastructure includes internal access roads, security fencing, and surveillance systems, as well as an administrative centre within the Agricola Grăniceri premises. Agreements with local councils will facilitate road improvements for site access.

### 2.2 Project and location and affected communities

The Project is in the West of Romania, in the North-Western area of Arad County approximately 3.6km east of the border with Hungary (see Figure 2.1: below). The area belongs to the territory of Grăniceri and Pilu communes and the nearest settlements to the Project area are:

- Grăniceri - 250m west, (1,214 inhabitants);
- Pilu - 2.5km north-west, (1,067 inhabitants);
- Siclau - 2km south-east (989 inhabitants);
- Socodor - 2.7km east. (2,317 inhabitants).

The Project footprint is located within Natura 2000 SCI and SPA protected sites Câmpia Crişului Alb şi Crişului Negru (ROSPA0115) and Nădab - Socodor - Vârşad (ROSCI023).

**Figure 2.1: Dama solar project location and layout**



Source Project ESIA, 2023

## 2.3 Land take requirements and scope of the LRP

The PV site itself has been secured through a commercial transaction with a single entity. The scope of this LRP covers the limited number of smallholders, tenants, or communal users potentially impacted along the corridor of the 3.6km stretch of the 400kV underground power line and the Project's Interconnection Substation (ICS) "Grăniceri", to be constructed on an area of 3.3ha land, all located on land owned by Grăniceri Commune.

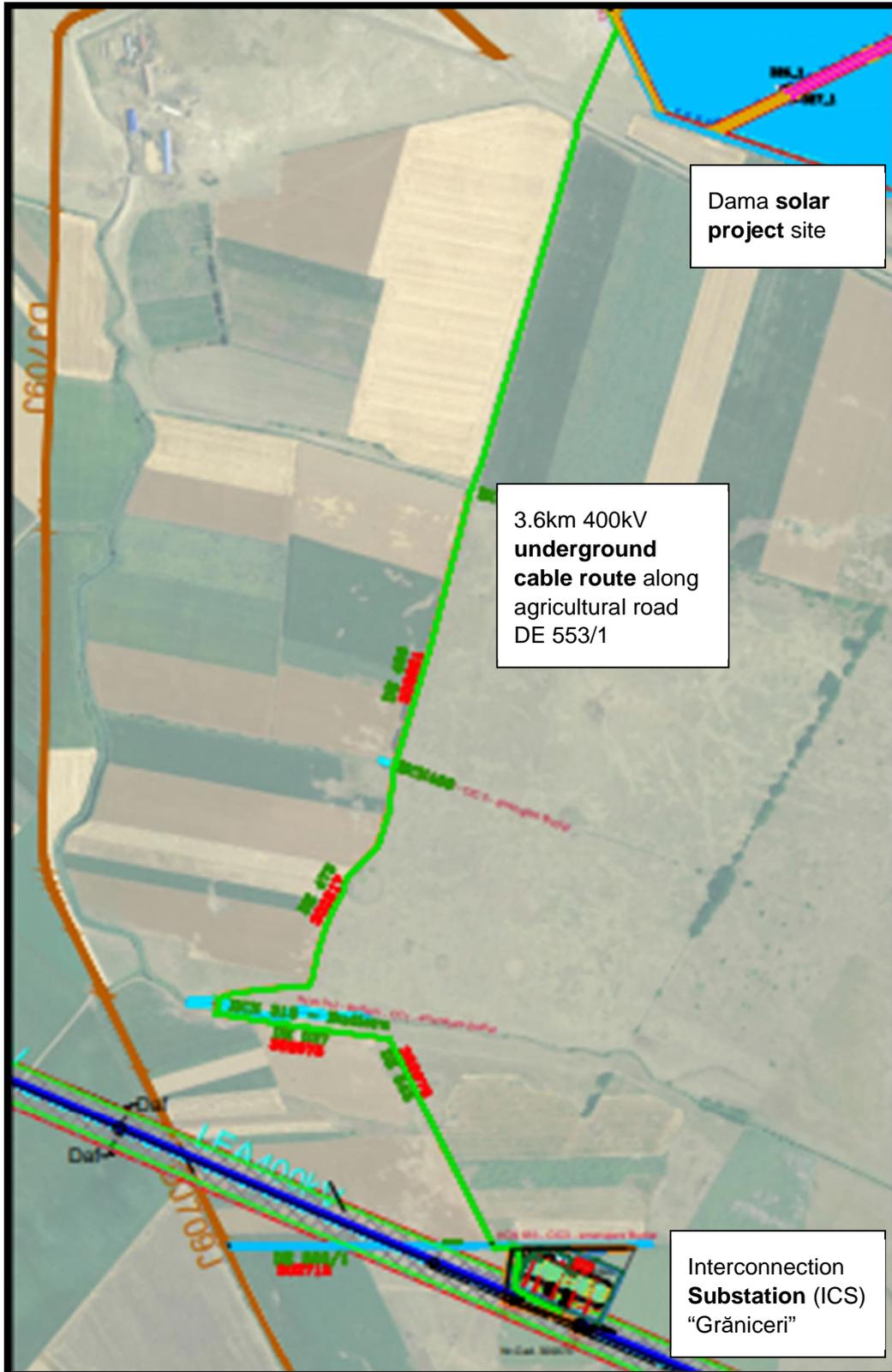
The grid connection underground cable is to be developed on a limited area of pastureland along the existing agricultural roads, railway and drainage channels crossings and County Road DJ709B (Grăniceri - Siclau). The cable will be laid underneath the agricultural road DE 553/1 connecting the substation to County Road DJ709J and the road will be upgraded.

The total surface required for the works is 5.64ha, comprising:

- 1.44ha – total surface affected by the underground transmission line, to be temporarily affected during construction
- 0.9ha – total surface affected by the cable laying and required upgrade works to road DE 553/1
- 3.3ha – surface permanently occupied by the 400kV substation.

The location of the ICS substation and the cable route which consist of the project components covered under this LRP are shown in Figure 2.2 below

Figure 2.2: Footprint of the ICS substation and underground cable in LRP scope



Source: Rezolv Energy

For the new Substation, a 3.3ha land plot was concessioned for a 49-year period and for a royalty to be paid from the start of the concession agreement, which will double when construction starts and the land is accessed. Additional to that, a 189m<sup>2</sup> surface was purchased from the Commune for the purposes of the grid connection and further 0.5ha were additionally secured via Right of Use and Servitude Agreements (see Table 2.1 below for details).

**Table 2.1: Land secured for the grid connection substation and transmission line**

Land registry No.	Type of contract	Type of use	Surface (ha)
301896	Concession contract 1985/05.08.2021. Yearly payment from the moment the concession is signed.	Permanent	3.30
304187	Right of Use and Servitude Agreement - decision of Grăniceri Local Council 11/ 30.01.2023 for E-Distributie Banat. Free of charge.	Temporary	0.48
Plot 324/15	Right of Use and Servitude Agreement - decision of Grăniceri Local Council 10/ 30.01.2023 for E-Distributie Banat. Free of charge	Temporary	0.016
304093	Right of Use and Servitude Agreement no.409/24.03.2022	Temporary	0.68
304094	Right of Use and Servitude Agreement no.409/24.03.2022 <sup>1</sup>	Temporary	44.70

The land plots for the grid connection underground cable are owned by Grăniceri Commune and were secured via land concession contract and respectively use and servitude agreements. The underground power line is on the on the agricultural road DE 553/1.

<sup>1</sup> Land Registry No. 304094 covers a surface of 44.70 ha under Right of Use and Servitude Agreement no.409/24.03.2022, approximately 0.9 ha of this will be temporarily impacted during construction works along DE 553/1.

## 3 Approach and methodology

### 3.1 Overview

The approach and methodology combined a targeted review of secondary data with focused primary data collection, proportionate to the limited scale of anticipated project impacts. The baseline assessment was informed by the existing Project ESIA and SEP, including the Socioeconomic Baseline Study, publicly available contextual information, and available district- and county-level statistical data. This was complemented by field-based observations and primary data collection undertaken by the Mott MacDonald team between 27 and 31 October 2025, including travel along the underground cable route, Project-Affected Household (PAH) socioeconomic and impact surveys, and targeted consultations with relevant local authorities and institutions.

The Project does not involve physical displacement of people or structures, and land access was secured through voluntary agreements. However, a limited number of households may experience economic impacts linked to land use and grazing access. As such, data collection was intentionally focused and proportional, in alignment with IFC Performance Standard 5 and EBRD Performance Requirement 5 requirements for livelihood restoration planning (the full reference framework is described in Chapter 4). The approach to the different data collection activities is laid out below.

### 3.2 Project affected people (PAP) consultation and surveys

The (PAP) socioeconomic and impact surveys were designed to be proportionate to the limited, temporary and localised nature of anticipated land-related impacts. Screening of the final project footprint, with particular focus on the underground cable alignment, confirmed that no residential structures, commercial businesses, or physically displaced households are located along the route and no formal economic enterprises or settlements will be directly affected by land acquisition or access restrictions.

The only directly affected receptors identified were two livestock-herding households (hereafter referred to as Directly Affected Household 1 (DAH-1) and DAH-2), both of which rely on grazing land intersected by or adjacent to the underground cable corridor. As such, a targeted directly affected household consultation approach was applied, focusing specifically on these two cattle and sheep herding families. Given the very limited number of directly affected households, a large-sample quantitative household survey was considered neither appropriate nor proportionate.

The PAP surveys were undertaken with both directly affected households. They were implemented using structured and semi-structured household questionnaires, supported by in-depth discussions with adult household members. This approach is consistent with good international industry practice to establish a robust baseline for assessing risks of economic displacement and informing livelihood restoration planning linear infrastructure involving small-scale land take. The surveys were designed to capture detailed household-level information on:

- Demographic profile and household composition
- Land tenure and land-use arrangements
- Livelihood activities and income sources
- Seasonal grazing patterns and mobility routes
- Dependence on the affected land for subsistence and commercial purposes

- Access to services, subsidies, and institutional support
- Existing vulnerabilities and coping mechanisms

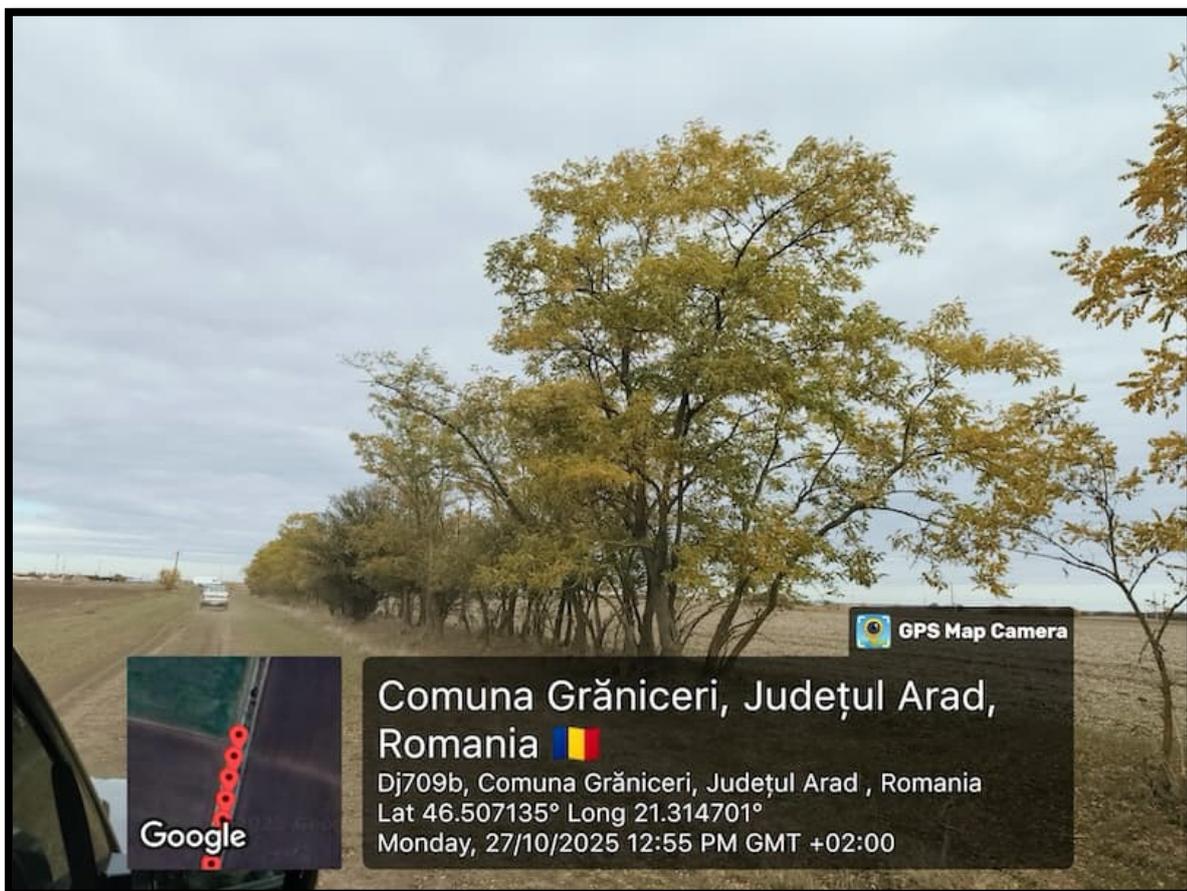
The data collected establishes a focused and proportionate socioeconomic baseline for the directly affected households, supports the identification of potential livelihood impact pathways associated with restricted access or disturbance, and provides the evidence base for defining appropriate entitlement, compensation, and livelihood restoration measures under the LRP in alignment with IFC Performance Standard 5 and EBRD Performance Requirement 5 requirements.

### 3.3 Field-based observations of livelihoods and impacts

Based on existing mapping and land access documentation, a field-based site and cable route walk over and assessment was undertaken of the land use of the PAPs whose land use or livelihoods may be affected on 28<sup>th</sup> October 2025 and the verify the team's understanding of the impacts.

Accompanied by the Mayor and Rezolv Energy representatives, the entire cable route was travelled, starting from the substation area, and ending at the future photovoltaic mirror installation area. Along this route, photographs were taken to document elements relevant to impact assessment (see Photo 3.2).

**Photo 3.1: Site visit underground transmission line route tour**



Source: Mott MacDonald Ltd.

The aim was to visually assess and document the conditions within the project area and its vicinity. This included inspecting land use, infrastructure, and agricultural activities that might be affected by the project. Direct field observations were focused both on the land use at the Project's ICS substation and along the 400kV underground power line; and the baseline conditions of the local affected communities (housing quality, infrastructure, public services, community functionality).

The assessment found that although the project footprint is mainly situated on leased grazing land, certain agricultural fields in the adjacent buffer zone could be impacted by construction activities, such as the placement of machinery and materials. These observations are important for understanding the scope of project-related disturbances and will guide the development of appropriate mitigation measures and compensation plans.

Key features observed included:

- The Dah-2's sheep grazing fields,
- The route used by the Dah-1 household for cattle movement
- Agricultural access roads
- Drainage canals
- Bridges over the canals
- County Road 709B
- Railway line crossing the area

Community level social baseline observations covered:

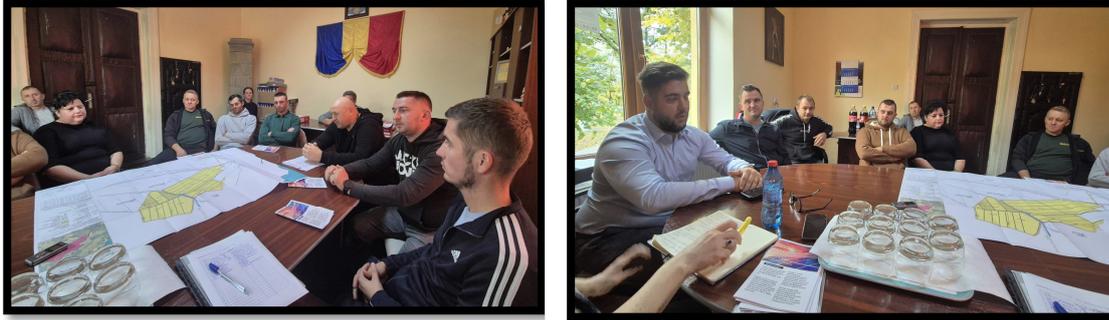
- Household conditions
- Paved roads' quality
- Water, sewage, and gas infrastructure
- Schools, kindergarten, churches, shops, and the children's park
- Ongoing works on a new bicycle lane network being built across the village.

The information obtained was used to inform the socioeconomic baseline presented in chapter 6 and the impact assessment in chapter 7.

### **3.4 Targeted stakeholder consultation with Local Authorities**

Targeted stakeholder engagement was undertaken with relevant local government and institutional stakeholders. This engagement focused on verifying baseline conditions, identifying indirect users of the affected area, and understanding institutional requirements relevant to land use, grazing eligibility and timing of construction works. These also clarified any indirect risks associated with grazing activities and agricultural subsidy schemes along the underground cable route (see Photo 3.2).

**Photo 3.2: LRP consultation meetings with Grăniceri local authorities and Mayor**



Source: Mott MacDonald Ltd.

The consultation included meetings with local government representatives from Grăniceri and Pîlu communes, municipal land management departments, and agricultural associations. A moderated group discussion was also organized at Grăniceri Town Hall with the Local Council, Mayor, and General Secretary, alongside representatives of Rezolv Energy. A separate interview was also conducted with the General Secretary to gather institutional perspectives. The topics discussed and how they have been addressed in the ESIA are presented in Section 5.3.

### 3.5 Data collection limitations and constraints

While the methodology was designed to be proportionate to the scale and nature of the project, and commensurate with the anticipated impacts, some constraints were encountered and mitigated through targeted measures. The availability of precise secondary demographic data was limited, so information was triangulated using Town Hall records, Local Council data, official statistics, and direct field observations. Misperceptions regarding the “communal pasture” were resolved by verifying land ownership and legal status through consultations with the relevant authorities. Finally, seasonal variability in agricultural activities was understood by mapping patterns in alignment with the pastoral calendar. This was identified through analysis of the legal framework<sup>2</sup> as well as information provided by the mayor (as detailed in sections 3.4 and 5.4). The pastoral calendar is included in all contracts through which the Grăniceri Commune Town Hall leases land for grazing purposes.

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<sup>2</sup> Government Emergency Ordinance no. 34/2013 on the organization, administration, and use of permanent grasslands; Law no. 86/2014; and the Local Council Decision of Grăniceri Commune

## 4 Regulatory and policy framework

### 4.1 National legal framework

#### 4.1.1 Institutional overview

Romania’s governance is organized into two tiers: central and local authorities, under Framework Law no. 195/2006 on decentralization. The country is divided into 41 counties and Bucharest, each with an elected County Council and Mayor at the local level, while Prefects represent the central government and can suspend unlawful local decisions. Below communes, villages have no autonomous governance. The Project is located in Arad County, Grăniceri Commune. Institutional arrangements for expropriation and land registration remain fragmented, prioritizing rapid land transfer for public projects over social safeguards, grievance mechanisms, and fair compensation aligned with international standards.

This structure directly influences LRP implementation, particularly stakeholder engagement and dispute resolution, as local authorities play a key role in communication and land-related decisions while formal grievance mechanisms are limited.

#### 4.1.2 Relevant land legislation

Romania’s land laws and expropriation legal framework (summarised in Table 4.1 below) is primarily governed by Law 33/1994 on expropriation for public utility and Law 255/2010, which streamlined procedures for infrastructure projects, particularly those financed through EU funds. These reforms expanded the scope of public utility and accelerated acquisition processes for sectors such as energy, transport, and water. However, Law 255/2010 significantly reduced procedural safeguards for property owners, removing rights such as appealing expropriation notifications and contesting public interest decisions.

**Table 4.1: Overview of relevant Romanian land legislation**

Law	Number	Summary
Law on Expropriation for Public Utility	Law no. 33/1994	Framework for expropriation in public interest; sets compensation rules; foundational statute still referenced in practice.
Law on Expropriation for Public Utility Purposes	Law no. 255/2010	Modernized procedures for declaring public utility, notifying owners, and placing compensation in escrow; key for infrastructure projects.
Law on Cadastre	Law no. 105/2019	Regulates property registration and cadastral data; ensures legal certainty in ownership and supports land administration.
The Civil Code	Law no. 287/2009	Defines real rights (ownership, usufruct, servitudes) and lease agreements; backbone of property law.
Land Law	Law no. 18/1991	Categorizes land by use (agricultural, forestry, urban); basis for land classification and national land policy.

The process now relies heavily on courts for dispute resolution, which can be inaccessible to vulnerable groups, and no formal grievance mechanisms are mandated. Restitution of properties confiscated during the Communist era remains incomplete, despite special laws and commissions intended to expedite unresolved cases, especially for EU and IFI-financed projects.<sup>3</sup>

<sup>3</sup> World Bank (2025), Overview Assessment of Romania’s National Regulatory Framework and Practices on Environmental and Social Risk Management.

There is not expected to be any expropriation for the components of the project covered under this LRP, as such the most relevant laws are:

- Property and Cadastre Laws ensure secure land rights and accurate registration, critical for confirming project land status and any temporary easements.
- Civil Code governs servitudes and lease agreements, relevant for managing temporary access routes and rights of way.
- Energy Infrastructure Norms define safety zones around power lines, influencing access planning and worker safety.
- Social Assistance Law guarantees protections for vulnerable groups, supporting entitlement measures in the LRP.

Legal compensation processes focuses mainly on cash payments based on public notary market studies rather than full replacement value, excluding indirect and livelihood losses. Social considerations and identification of vulnerable groups are largely absent from expropriation processes. Informal land users, including renters and vulnerable populations such as the Roma minority, are typically excluded from compensation and assistance.

## 4.2 International reference framework

The project is required to comply with the environmental and social safeguards established by its financiers, most specifically IFC Performance Standard 5 (PS5, 2012) and the EBRD Environmental and Social Performance Requirement 5 (PR5) on land acquisition and involuntary resettlement (2024). Adherence to these frameworks is committed to promoted internationally recognized best practices for managing environmental and social risks associated with land acquisition and involuntary resettlement.

Both standards have robust requirements aimed at avoiding or minimizing displacement wherever feasible, guaranteeing compensation at full replacement cost, and delivering comprehensive resettlement and livelihood restoration support to affected populations (Table 4.2 below provides an overview of the key provisions of each).

**Table 4.2: Overview of IFC PS5 (2012) and EBRD PR5**

Topic	IFC PS5 (2012)	EBRD PR5 (2024)
Objective	Avoid and minimize displacement; restore livelihoods where impacts occur.	Avoid and minimize displacement; treat resettlement as development opportunity; ensure sustainable livelihood restoration.
Scope	Physical and economic displacement from land acquisition or restrictions on land use.	Same, including temporary restrictions and informal/customary tenure.
Eligibility & Baseline	Census and socio-economic baseline; cut-off date for compensation.	Socio-economic profiling; includes formal, informal, and customary users; culturally appropriate cut-off date.
Consultation	Informed participation throughout planning and implementation.	Meaningful, inclusive engagement; gender-sensitive and documented.
Compensation & Livelihood	Full replacement cost for lost assets; support to restore living standards.	Full replacement value including transaction costs; tailored livelihood restoration plans with measurable outcomes.
Grievance & Monitoring	Accessible grievance mechanism; monitoring of RAP/LRP implementation.	Transparent grievance system; continuous monitoring and public reporting.

In summary the key differences relevant to this LRP are that:

- PR5 explicitly covers temporary restrictions and informal tenure.
- PR5 requires measurable livelihood outcomes and public reporting.

This LRP and the project is designed to be consistent with both sets of standards.

### 4.3 Regulatory and international standards gap analysis

Table 4.3 below presents comparative gap analysis between the Romanian legislation and the international reference framework. The objective is to identify areas of divergence, highlight regulatory limitations, and propose the LRP strategy to ensure alignment with lenders' requirements. Where national legislation does not meet the requirements set forth by the international standards, the project will adopt the more stringent provisions. In such cases, targeted gap-filling measures will be implemented to ensure that all project activities are conducted in accordance with the highest applicable environmental and social safeguards.

**Table 4.3: Regulatory and international standards comparative gap analysis**

Relevant topic	IFC PS5 / EBRD PR5 Requirements	Romanian Legal Framework	Identified legislative Gap	LRP strategy to address gaps
Economic Displacement and Livelihood Restoration	Requires compensation and measures to restore or improve livelihoods for economically displaced persons, including income-generating capacity and living standards.	Law No. 255/2010 provides compensation for expropriation but does not mandate livelihood restoration.	No legal obligation for livelihood restoration beyond monetary compensation.	Project applies international standards; a comprehensive LRP includes tailored livelihood restoration measures and monitoring.
Cut-off Date	Establishes a cut-off date to determine eligibility for compensation and assistance. This date must be publicly disclosed and culturally appropriate.	Romanian legislation does not define or require a cut-off date in the context of land acquisition or resettlement.	Lack of formal mechanism to prevent opportunistic claims post-disclosure.	The project team communicated eligibility criteria and project timelines during stakeholder engagement. Given the low risk of encroachment, a formal cut-off date was not deemed necessary.
Compensation	Compensation must be provided at full replacement cost, excluding depreciation, salvage value, or project-derived benefits.	Compensation is based on market value determined by expert evaluation, which may include depreciation and other deductions.	Romanian law may undervalue assets compared to international standards.	The primary strategy is to avoid impacts through scheduling, but compensation will be paid at full replacement cost for any loss of earnings if they occur
Vulnerable Groups	Requires identification of vulnerable persons and development of tailored support measures.	General provisions exist under social assistance law but lack project-specific application.	No detailed procedures for assessing or supporting vulnerable groups in resettlement contexts.	Vulnerability assessments were conducted and it was determined that there are no directly affected vulnerable people.
Grievance Mechanism	Must be accessible, culturally appropriate, and allow anonymous complaints. Should not restrict access to judicial remedies.	No legal requirement for project-level grievance mechanisms.	Lack of formal grievance redress procedures.	A project-specific Grievance Mechanism (GM) has been developed and communicated to stakeholders. It is accessible, inclusive, and allows anonymous submissions (see Chapter 5).
Monitoring and Evaluation	Requires ongoing monitoring, third-party audits, and adaptive management to ensure effectiveness.	No legal provisions for monitoring resettlement or livelihood restoration.	Absence of monitoring obligations in national law.	Monitoring and evaluation protocols are embedded in the LRP. Results will be tracked and corrective actions implemented as needed (see Chapter 11).

## 5 Stakeholder engagement & grievance mechanism

### 5.1 Overview

This chapter outlines the stakeholder engagement and grievance mechanism established for the LRP, ensuring that PAPs and relevant stakeholders are meaningfully consulted throughout the process. Engagement activities are designed to provide clear, timely, and accessible information, enabling PAPs to understand the LRP objectives and participate actively. Structured opportunities are provided enabling PAPs to share feedback, raise concerns, and propose ideas, supported by a transparent grievance mechanism that addresses issues promptly and fairly. These measures aim to foster trust, inclusivity, and accountability, aligning with lenders' requirements and international good practice.

### 5.2 Stakeholder analysis

A process of stakeholder analysis undertaken included the identification of the stakeholders who belong to one of three sets of actors below:

- Individuals directly affected by the Project as well as those who have an interest
- Those with local expertise about one or more of the Project activities
- Those who have power to make decision that influence development

The following stakeholders have been identified as key to the LRP:

- Project-affected persons and their household members
- Local council committee members of the local villages (listed in section X.X)
- Arad county authorities including Environmental Officers and Community Development Officers
- Business and organizations operating in the area
- Non-governmental organizations (NGOs) operating in the area

These stakeholders have already been engaged through previous consultation meetings held to introduce the Project, as summarized below.

### 5.3 Previous ESIA stakeholder engagement activities

In accordance with the ESIA Stakeholder Engagement Plan (SEP), public consultation has followed regulatory requirements during the Project's development and re-zoning stages. Notice boards were posted, and a public debate was held on 23 February 2021 at Arad County Council. Consultations also took place in Grăniceri commune (Grăniceri and Pilu villages) as part of the formal process. A Public Consultation Report was issued in March 2021, requesting the developer to identify all stakeholders for ongoing consultation.

In this phase of the project, stakeholders raised concerns related to the LRP that were handled within the regulatory process by Arad Environmental Protection Agency including the conservation NGO Milvus Asociația pentru Protecția Păsărilor Targu Mures, which highlighted pastureland use for livelihood purposes. Also, a Pilu landowner expressed concerns about property impacts. Stakeholders were consulted further during the ESIA scoping site visit in November 2022. Semi-structured interviews were used to disclose the Project and ESIA

information, validate the social area of influence, establish communications, and explore stakeholder concerns.

## 5.4 Institutional stakeholder consultation

The first LRP consultation meeting was held on 28 October 2025 at the town hall with members of the Local Council, the mayor, the secretary general, representatives of Rezolv Energy, and the sociologist responsible for LRP preparation. This meeting introduced the LRP process and shared initial project information, as summarised in Table 5.1 below.

**Table 5.1: LRP consultation meeting summary**

Stakeholders	Date, Time, Format, Location	Discussion Points	Relevant LRP Sections
Mayor and Local Council (Town Hall representatives)	28 Oct, 15:30 – Official council meeting, Town Hall	Reviewed project footprint and underground cable alignment; clarified local understanding of potential impacts and land use implications	Baseline conditions; Identification of affected people; Impact scoping
Town Hall – General Secretary	29 Oct, 10:30 – Semi-structured interview, Town Hall	Demographic trends; land ownership and tenure forms; household typologies; main income sources; migration patterns	Socioeconomic baseline; Vulnerability analysis; Impact assessment
Agency for Payments and Intervention in Agriculture (APIA), Chişineu-Criş – Director	13 Nov, 14:30–16:00 – APIA office, Chişineu-Criş	Satellite monitoring period (Apr–Sep) and implications for construction; agri-environment payment levels (€159/ha); penalty thresholds (<0.01 ha; <20%; >20%); risk of visible disturbance (tracks, temporary access routes); recommendation to schedule works outside monitoring period (Oct–Mar); need for land recovery measures; avoid permanent linear features in pasture; direct notification of land users	Entitlements; Livelihood restoration strategy; Construction management requirements

## 5.5 Affected community consultation

On 29 October 2025 targeted household-level consultations were undertaken with the two identified directly affected households (DAH-1 and DAH-2). These consultations were conducted as in-depth interviews with adult household members<sup>4</sup> and were designed to inform the livelihood impact assessment and the avoidance-led mitigation and restoration measures set out in this LRP. They were guided by structured and semi-structured questions aligned with the Directly Affected Peoples Census and Impact Survey presented in Annex A. Information gathered was used to confirm PAP identification, understand livelihood activities and access arrangements, identify seasonal constraints, and ultimately to characterise the potential impacts and the define appropriate avoidance measures and acceptable construction conditions. A summary of these consultations is provided in Table 5.2 below.

<sup>4</sup> For Directly Affected Household-1 (DAH-1), the consultation was attended by the household head and an adult family member, with the Mayor present.

For DAH-2, the consultation was attended by the female head of household and two adult household members. All attendees participated in the discussion, with the household heads acting as the primary decision-makers on livelihood and land-use matters.

**Table 5.2: Consultations with Directly Affected Households**

Household	Location	Key findings on baseline, impacts and preferences
Directly Affected Household-1 (DAH-1) (cattle farming)	Grăniceri Town Hall	<p>Use of agricultural access roads for routine cattle movement between pasture areas</p> <p>Sensitivity to temporary access restrictions during active grazing periods</p> <p>Preference for works to be undertaken in short sections with maintained or alternative access where needed</p> <p>Expectation that affected access routes and disturbed areas are fully reinstated following construction</p>
Directly Affected Household-2 (DAH-2), (sheep farming)	Household residence, Grăniceri commune	<p>Reliance on municipally leased pastureland for grazing</p> <p>Grazing calendar and sensitivity to agricultural subsidy monitoring periods</p> <p>Expectations for land reinstatement and access restoration</p> <p>Preferred timing of works outside grazing and monitoring periods, informing avoidance and scheduling measures in this LRP</p>

Both consultations confirmed that, subject to implementation of the proposed avoidance and access management measures, anticipated livelihood impacts are limited in scale and duration. Feedback provided by the affected households directly informed the impact assessment and the mitigation, scheduling, and contingency measures described in Chapters 7 and 9. Engagement with affected households will continue during LRP implementation through the Project’s monitoring activities and grievance mechanism.

## 5.6 Information disclosure

Information disclosure has been an integral part of the LRP preparation process. During the fieldwork phase, the project team prepared and distributed a Public Information Brochure (PIB) in Romanian to ensure that affected persons and local stakeholders had clear, accessible information about the project, the entitlement framework, and the grievance mechanism. This brochure was shared at the Local Council meeting on 28 October and during interviews with the two directly affected families on October 29, 2025. Copies were also posted on the town hall notice board and distributed to council members (see Figure 5.1 and Figure 5.2 below).

Figure 5.1: Project’s poster, public information brochure and grievance form



Figure 5.2: Project’s poster placed on the announcement board at the town hall



Source: Mott MacDonald Ltd.

To reach a wider audience, the brochure was circulated digitally via WhatsApp and social media, while paper copies were provided for those with limited digital access. The brochure was written in simple language and included details on how affected persons can participate in livelihood restoration activities, as well as the steps for raising grievances.

## 5.7 Participation of women and other vulnerable groups

Whilst neither of the directly affected households meet the LRP vulnerability criteria (as explained in section 6.9), DAH-2 is female headed sheep farming family. The head of the household was the lead consultee of the consultation meeting on 29 October 2025.

Planning of community and affected peoples' consultation meetings has and will continue to take careful account of barriers to women's participation to ensure they can engage fully throughout the process. Where feasible, safe and supervised space for children is provided at meeting venues so that caregivers can participate without concern. Meeting locations are selected for accessibility, enabling attendance by households with elderly or disabled members.

## 5.8 Grievance Mechanism

Rezolv Energy and West Power Investments SRL (WPI) aim to engage with stakeholders on land acquisition and economic displacement in a manner that is fair, transparent, and solution-oriented. Through careful design and implementation of land acquisition, full participation and consultation with PAPs, and strong coordination among implementation entities, the Project seeks to minimize grievances.

A grievance is defined as any actual or perceived issue that may give grounds for complaint. PAPs may disagree with decisions, practices, or activities related to land acquisition or displacement. This section sets out the Project's livelihood restoration grievance mechanism.

The mechanism is based on the following principles:

- PAPs will be fully informed of their rights and the procedures for submitting complaints, verbally or in writing, during consultations, surveys, and at the time of compensation.
- Each grievance will be registered, acknowledged, and tracked until closure.
- All grievances will be addressed within a reasonable timeframe.
- Judicial action will be avoided wherever possible through early resolution.

Language, literacy, and gender will not be barriers to submitting complaints, and no costs will be imposed on complainants. To implement this mechanism, the Dama Solar Project team will:

- Disclose grievance contact details in accessible locations such as the Grăniceri town hall and the Project office.
- Provide multiple submission channels, including a complaints box, phone, and email.
- Record grievances raised at local government level and by their staff.
- Keep complainants informed of actions taken and decisions made.
- Log all activities and timelines to ensure timely resolution.

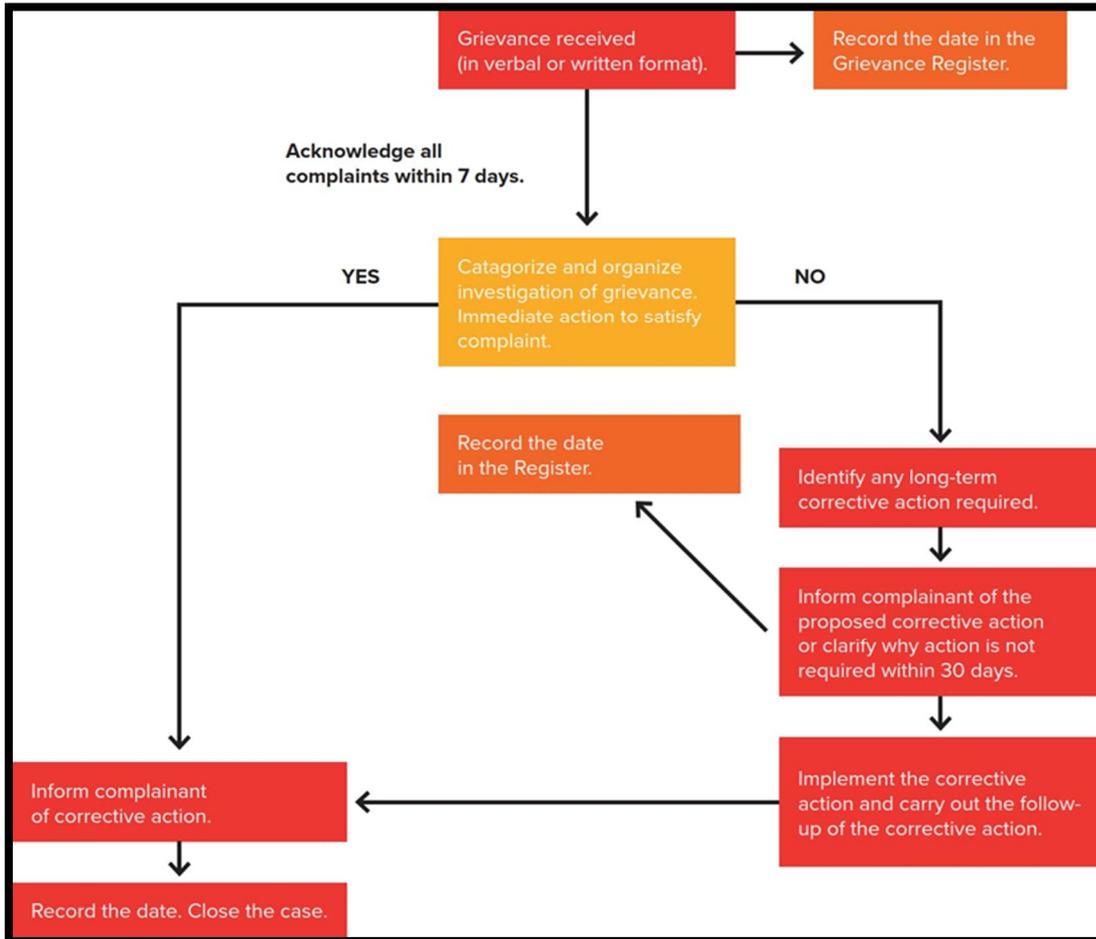
Project grievance mechanism contact details are provided in Table 5.3.

**Table 5.3: Grievance mechanism contact details**

Name:	Oana Iuga
Role:	Community Liaison Officer
Email:	oiuga@dama.energy
Telephone number:	+40735513690

All complaints will be acknowledged in seven days, and the complainant will be provided with a response on whether a corrective action will be applied or why further action is not required within 30 days of receipt. The templates for the grievance form and grievance log are available in Appendices. The grievance resolution process is summarised in Figure 5.3 below.

**Figure 5.3: Grievance redress process**



Source: Mott MacDonald Ltd.

## 5.9 Draft LRP disclosure

The draft LRP will be disclosed to the two directly affected households surveyed made publicly available in Romanian and English to local communities and comments will be invited. Hard copies will be placed at the Grăniceri town hall and the project offices, and the document will also be uploaded to the websites of the international lenders for a defined period.

In addition, the final PIB summarising the LRP will be distributed to affected persons and local stakeholders. During the LRP disclosure period and prior to commencement of construction, the Project will also undertake targeted information disclosure to nearby farmers and agricultural road users who may experience temporary access disruption. This will include advance notice of construction timing, expected duration of works, temporary access arrangements, and contact details for the Project grievance mechanism. Feedback received during the disclosure

period will be considered in refining access management measures and construction scheduling where practicable, and engagement with indirectly affected users will continue throughout construction through ongoing communication and the grievance mechanism.

These measures will ensure that all relevant information such as entitlements, grievance procedures, and implementation timelines remains accessible in formats and languages that are understandable to the community.

The schedule for disclosure meetings will be agreed by Rezolv Energy's social team in coordination with local council members, but disclosure is tentatively planned for February/March 2026. The objectives will include:

- Disclosure of the draft LRP and distribution of the Public Information Brochure (PIB)
- Agreement on entitlements and construction schedules
- Facilitation of LRP monitoring activities.

Stakeholder comments on the draft LRP will be considered and addressed before the report finalised for implementation.

## 6 Socioeconomic baseline

### 6.1 Overview

This chapter describes the socio-economic baseline and establishes the living and livelihood conditions of the PAPs and the wider Grăniceri commune. It focuses on agricultural land users, particularly the two directly affected households that graze livestock in areas that will be affected by temporary access restrictions during the laying of the underground cable and construction of the substation, namely the:

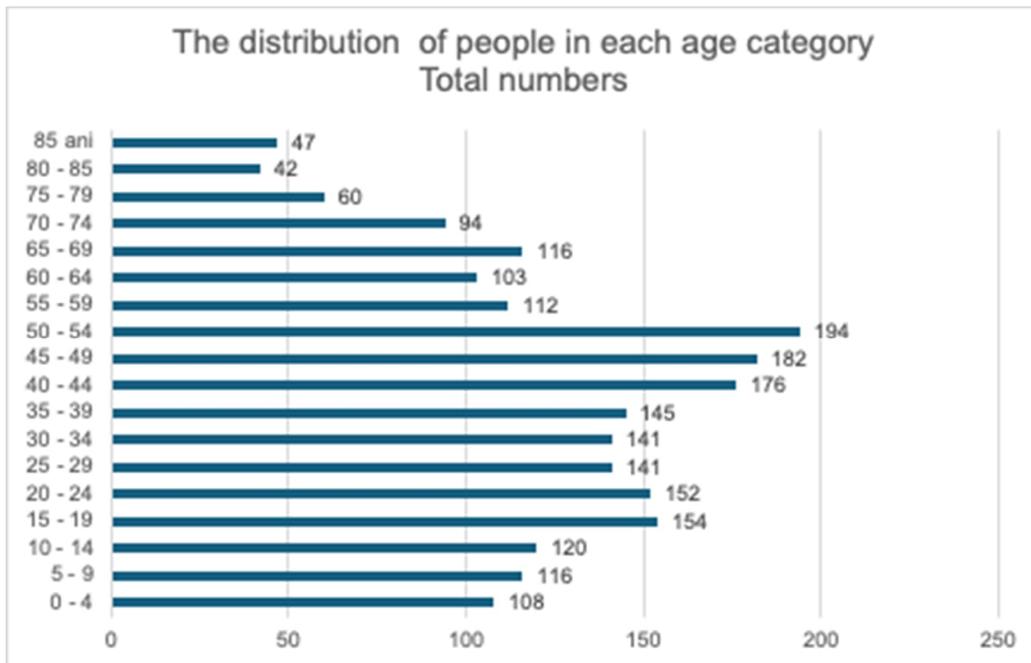
- DAH-1 (dairy and mixed agriculture farmers): ~45 cattle; daily movement intersects the corridor
- DAH-2 (sheep herders): 1,100 sheep; seasonal movement across the corridor.

The baseline informs eligibility, compensation, and livelihood restoration measures and provides Key Performance Indicators (KPIs) for monitoring outcomes.

### 6.2 Demographic overview

Grăniceri commune has 2,203 residents (2021 census), with a balanced gender ratio and an aging population. The average household size is 3.4 persons, and 27% of households are female-headed, often widows or spouses of migrants. About one-quarter of households include a member with a disability, which is relevant for accessibility planning. Migration for work abroad is common, contributing to demographic aging and reliance on remittances. The demographic profile is depicted in Figure 6.1 below.

**Figure 6.1: Demographic profile of the Grăniceri commune.**



Source. RPL Population and Housing Census 2021 data

According to the general secretary of the town-hall, Grăniceri village has around 325 residential properties, half of them being empty. Households are typically multi-generational, and local livelihoods combine small-scale agriculture, livestock rearing, and seasonal employment. The dominant age group (40–59 years) indicates a mature workforce, while youth outmigration may affect future agricultural labour availability. These factors shape vulnerability and resilience to temporary disruptions in grazing access.

## 6.3 Livelihoods and income

### 6.3.1 Overview

The economy of Grăniceri commune is relatively strong for a rural area, supported by a mix of agricultural production, livestock breeding, wage employment, pensions, remittances, and small-scale trade. This diversity provides resilience but also creates dependencies on land access, seasonal labour, and market connectivity. The dependence on communal grazing land, seasonal income variability, and limited credit access increases agricultural household vulnerability to land restrictions, pasture degradation, and disruptions to market connectivity and as such, livelihood protection measures will prioritize maintaining grazing access. The livelihood profiles of the two directly affected households is presented in Table 6.1 below

**Table 6.1: Summary livelihood profiles of directly affected households**

Household	Primary livelihood	Key livelihood characteristics	Income characteristics	Livelihood sensitivities
Directly Affected Household 1 (DAH-1 – cattle farming)	Cattle farming	Livestock rearing with routine movement between pasture areas- Reliance on agricultural access roads Livelihood activities vary seasonally	Livestock-based income; seasonal and variable rather than fixed or salaried	Sensitivity to temporary access disruption during active grazing periods
Directly Affected Household 2 (DAH-2 – sheep farming)	Sheep herding	Reliance on municipally leased pastureland- Seasonal grazing and movement patterns- Livelihood activities supported by multiple working-age household members	Pastoral income sources; mixed and seasonal in nature	Sensitivity to grazing cycles and agricultural subsidy monitoring periods

The profiles indicate established, seasonal pastoral livelihoods with diversified household labour and sensitivity primarily to access and timing rather than asset loss. While no indicators of economic vulnerability are identified at baseline, vulnerability will be re-screened during implementation and appropriate livelihood vulnerability entitlements will be applied if monitoring identifies any emerging risks.

### 6.3.2 Agriculture and animal husbandry

Grăniceri, located in Arad County, one of Romania’s most productive agricultural regions, has fertile soils supporting cereals, maize, sunflower, alfalfa, and hay cultivation outside saline zones. Agriculture remains significant, though large-scale crop farming is limited by land consolidation and mechanization, reducing its role as a primary income source.<sup>5</sup> About 20–25% of rural households in Arad County rely mainly on crop farming.

<sup>5</sup> INS Romania, Agricultural Structure Survey (2023): <https://insse.ro/cms/en/content/structural-survey-agriculture-0>

Livestock breeding is central to rural livelihoods, with sheep farming being the dominant activity. Romania had approximately 10.4 million sheep and goats in 2024, with around 22% concentrated in the North-West region, including Arad County.<sup>6</sup> Sheep farming in Grăniceri is characterized by an extended grazing season due to the mild climate, seasonal mobility of flocks, and strong reliance on communal pastures. Dairy products such as milk, cheese, curd, and yoghurt are marketed through stable channels, including a partner shop in Arad town. There are some tensions in the area between sheep and cattle herders over grazing impacts and increasing pressure on pasture resources.

Livestock grazing occurs on private and leased pastures under formal agreements monitored by local authorities, with some routes intersecting the planned construction corridor, causing temporary access restrictions. Agricultural roads maintained by the town hall are vital for livestock movement and machinery access, and some livestock owners supplement income by providing mechanized services to other farmers, reflecting local economic interdependence.

The area is subject to agricultural-environmental regulations and measures <sup>11</sup> that prohibit land works from 1st May to 15th July each year.<sup>7</sup> Consequently, any construction activities affecting the land surface during this period can only resume after 15 July.

Farmers in the area have applied for subsidies offered by the Agency for Payments and Intervention in Agriculture (APIA) under Agri-environment Package 10 – Ecological refuges on arable land for bird species associated with agricultural landscapes, financed through the European Agricultural Fund for Rural Development (EAFRD) with co-financing from the Romanian state budget, but LRP consultation has verified that these will not be impacted by the project.

### **6.3.3 Market access, credit, and seasonality**

Agricultural and livestock products are marketed primarily in Chişineu Criş and Arad, supported by good road infrastructure, though congestion occurs during peak commuting hours. Access to formal credit remains limited, with most small-scale farmers relying on informal loans or input credit, constraining investment in herd expansion or agricultural modernization.

Seasonal variations strongly influence income flows, labour demand, and mobility patterns. Crop production peaks between July and October, while pastoral activities follow grazing cycles from April to November. These dynamics affect household cash flow and resilience, making timing critical for any livelihood restoration measures.

### **6.3.4 Wage income, pensions and remittances**

Many residents commute to Chişineu Criş and Arad for employment in factories, transport companies, mechanical workshops, construction firms, and retail businesses. Wage income provides stability but does not fully replace agricultural activities; even salaried households maintain small-scale farming for food security and supplementary income. Nationally, informal rural employment remains significant, exceeding 30% of the rural workforce.<sup>8</sup>

Pensions are a key source of stability for older residents, and many pensioners remain economically active through subsistence farming. Remittances from family members working abroad are also substantial, representing 2.5–3% of Romania's GDP in recent years and

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<sup>6</sup> Eurostat Livestock Statistics (2024): <https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=549389>

<sup>7</sup> This restriction protects the nesting season of the red-footed falcon, great bustard, and several other protected grassland and wetland bird species unique to the Grăniceri–Buduru region.

<sup>8</sup> ILOSTAT, Informal Employment in Rural Areas (2024): <https://ilostat.ilo.org/data/snapshots/informal-employment-rate/>

reaching approximately €600 million per month in 2025.<sup>9</sup> These transfers significantly improve living standards, reflected in well-maintained homes and modern household assets, but they also create economic disparities and vulnerability to external economic shocks.

## 6.4 Agricultural land use, tenure and access

### 6.4.1 Overview

The commune of Grăniceri exhibits a settlement pattern typical of Western Romanian rural communities with compact village cores surrounded by extensive agricultural fields, grazing lands, and communal access paths. Most agricultural land in Grăniceri is privately owned, with parcels clearly demarcated and registered in the land cadastre. Ownership is generally undisputed, and these plots support a range of agricultural activities. However, land tenure and land use in Grăniceri reflect a complex mix of formal ownership rights, customary practices, community perceptions, and the historical evolution of property distribution.

While the commune's administrative framework appears straightforward, the reality of land access - particularly for pastoralists - is far more nuanced. This context is critical for assessing potential disruptions caused by temporary construction works for the underground cable, as agricultural roads are essential for maintaining farming operations. Any restrictions on access during construction will therefore require careful coordination with land users to minimize disruption. The context and locality specific features of land use and land tenure in Grăniceri are elaborated in the sub-sections below.

### 6.4.2 Pastureland and perceptions on communality

Pastureland is used primarily by livestock farmers raising sheep and cattle, and tenure arrangements vary. Some pastures are privately owned by families with long-standing agricultural traditions, while others are leased from private owners through informal agreements or from the town hall under formal contracts monitored by local authorities. These leases are legally valid and regulated under local and national frameworks.

Legally, there are no communal lands in Grăniceri, but functionally, some privately owned or leased fields operate as shared grazing areas due to informal agreements, tolerance by landowners, and historical precedent. This explains the enduring perception that certain pastures are communal, even though they are private properties under the law.

A significant portion of land along the underground cable route belongs to Agricola S.A., a private company that purchased land from legitimate owners who regained it after the fall of the communist regime. Despite this clear legal status, many community members continue to perceive this land as "communal pasture."

This perception is rooted in historical use of the land as open grazing before its sale and in cultural expectations shaped by decades of state land confiscation under communism, which reinforced the idea that large open fields should function as shared resources.

LRP consultations with the town hall, local council, and PAPs confirmed that the land was never communal property, has had continuous private ownership, and was acquired legally by Agricola S.A. The "communal pasture" narrative is therefore a social perception rather than a legal reality, but it remains influential in shaping attitudes toward land use.

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<sup>9</sup> World Bank Migration and Remittances Data (2025):  
<https://data.worldbank.org/indicator/BX.TRF.PWKR.DT.GD.ZS>

### 6.4.3 Seasonal agriculture, roads and access challenges

Land use in Grăniceri is highly seasonal. Sheep graze across open areas from spring to late autumn, while cattle move daily between households and pastures, often crossing the planned cable route. Agricultural traffic peaks during planting and harvest, with heavy machinery in use. Grazing is permitted between May and October under Ministry of Agriculture Order 407/2020, with minor adjustments allowed for climate. These patterns, mapped during LRP field visits, should inform construction scheduling.

The commune maintains a network of agricultural and exploitation roads, owned and maintained by the town hall. These roads are vital for farming operations, providing access for the daily movement of livestock to grazing areas, seasonal movement of sheep flocks, transport of agricultural machinery such as tractors, balers, and combines, and access to privately owned agricultural parcels. Because these roads are integral to agricultural activities, any temporary restrictions during construction will require careful coordination to minimize disruption.

One specific agricultural road used by the DAH-1 is currently difficult or impossible to use due to the presence of dead animal carcasses dumped illegally by unknown individuals (see Photo 6.1 below). This situation creates health risks for cattle and complicates mobility for farming operations. Although this issue predates the project and is unrelated to project activities, it is relevant for route planning during construction to avoid compounding existing access problems.

**Photo 6.1: Agricultural access road used by DAH-1 for cattle grazing**



Source: Mott MacDonald Ltd.

## 6.5 Community, housing and assets

There will not be any physical displacement impacts, but understanding housing and assets is relevant to understand the socio-economic status and vulnerability of the affected community. Grăniceri has infrastructure above the national rural average, with paved roads, near-universal electricity, sewerage, gas, running water, waste collection, internet, and street lighting.

However, many households still use private wells and pit latrines, and heating relies mainly on firewood or coal.

Housing is predominantly privately owned, with over 95% being single-story family homes built between the 1960s and 1990s, constructed from brick or adobe with clay-tile or metal-sheet roofs. Most homes are structurally sound, and many have been renovated, though poorer and elderly households face maintenance challenges. Fences are typically metal or concrete, and car ownership is common, reflecting moderate prosperity despite limited public transport. Around a third of buildings are not occupied the year round, as explained in Table 6.2 below.

**Table 6.2: Dwellings in the Grăniceri commune.**

Data for Grăniceri commune		RPL 2021 data
Total buildings	1,022	Represents the number of individual structures recorded in the commune. Practically all (1,021) contain dwellings, meaning residential buildings dominate the local built environment.
Conventional dwellings	1,199	Refers to the total number of distinct housing units designed for permanent residence.
Occupied conventional dwellings	801	Around 67% of dwellings are occupied, while the rest (about 33%) are vacant or used seasonally, possibly by emigrants or as secondary homes.

Source : RPL Population and Housing Census 2021 data

Households typically have 500–1,000 m<sup>2</sup> yards for gardens and poultry, with modest productive assets such as hand tools, carts, and small tractors (under 15% of households). Some maintain simple outbuildings or sheepfolds near grazing areas. Overall, housing quality and infrastructure indicate a relatively stable and non-vulnerable community.

## 6.6 Social services and institutions

Grăniceri benefits from functional public infrastructure and a well-developed network of services for a rural area. The Town Hall provides administrative services, coordinates with Arad County authorities, and is regarded as transparent and responsive, holding periodic community meetings. Land governance is orderly, with cadastral records maintained and no outstanding disputes. The administration also works with agricultural associations and neighbouring communes to manage common pastures and grazing lands.

Education facilities include a primary school in Grăniceri (grades 0 to VIII), a smaller school in Șiclău (grades 0 to IV), and a kindergarten, while students attend secondary or vocational schools in Chișineu Criș or Arad. Health services are provided by two family doctors and a dental clinic. Utility networks include potable water, sewage, natural gas, electricity, internet, and telephony, and the commune finances these largely through its own revenues. Residents also have access to shops, small businesses, and a modern playground, reflecting a stable and well-serviced community.

## 6.7 Community perceptions and priorities

Community perceptions of the underground cable project are shaped by the local socio-economic context, reliance on agricultural and pastoral land, and generally positive relations with local authorities. Overall, attitudes are neutral to moderately positive. Residents and officials view the project as a necessary technical component of renewable energy development, associated with potential benefits for the commune. There is no fear of expropriation or physical displacement, which contributes to reassurance. Perceptions are summarised in Table 6.3 below.

**Table 6.3: Summary of perceptions and priorities**

Stakeholder Group	Attitude	Key Concerns	Priorities
Direct PAPs (shepherd, cattle farmer)	Neutral–positive	Disruption of grazing routes; timing of works	Maintain grazing continuity; clear schedule
Farmers (indirect PAPs)	Neutral	Access for machinery; avoid peak seasons	Predictable works; respect access rights
Local authorities	Positive	Need for early, clear communication	Coordination; functional GRM
Community (general)	Neutral–positive	Past poor practices by other firms	Quick repairs; visible land restoration

Source: Mott MacDonald Ltd.

The main expectation is that construction should not disrupt agricultural activities, particularly grazing routes and field access. Directly affected persons - the cattle farmer and the shepherd family - expressed practical concerns about timing and mobility rather than opposition to the project. Farmers represented in the Local Council emphasized the need for open machinery access and avoidance of peak agricultural seasons. Institutional stakeholders (Mayor, Local Council, Town Hall Secretary) consider impacts manageable but stress the importance of clear communication, coordination, and a simple, transparent grievance mechanism.

Past experiences with other companies have created conditional trust: residents expect the developer to “do the job properly and leave things as they were.” Concerns focus on temporary disruptions, while priorities centre on predictability, timely restoration, and respect for access rights.

## 6.8 Gender roles and relations

Gender roles in Grăniceri reflect traditional rural household structures, shaped by agricultural and pastoral activities, but women play an active and economically significant role in household livelihoods. Labour is divided along complementary lines: men manage livestock, grazing routes, machinery, and physical tasks, while women handle household organization, dairy processing, marketing, childcare, and administrative duties. These roles are flexible, with women assisting in farm work during peak periods such as lambing and milking. In one cattle-farming household, the farmer’s wife combines dairy processing and market sales with salaried employment.

Decision-making over land, assets, and income is generally joint, though men often lead on herd and land management due to constant field presence. Women contribute directly to income through dairy processing and sales, and in one case, a matriarch assumed control of the sheep business after her husband’s death. No restrictions were identified on women’s access to land or productive resources, and no gender-specific vulnerabilities relevant to the project were found. Temporary disruptions to grazing routes would primarily affect men, while women would only be indirectly impacted. Among the two affected households, one is male-headed and one female-headed, but neither faces gender-specific risks. Overall, Grăniceri appears economically stable, with many women employed or supported by extended families.

DAH-2 is female-headed, but as described below, it is not considered vulnerable. The matriarch has successfully managed the lucrative pastoral business for many years and benefits from strong family support. No households were found to be critically dependent on common resources beyond temporary grazing access, which will be managed through scheduling.

## 6.9 Vulnerable people

The LRP impact assessment applied vulnerability criteria relevant to the nature of the project and its potential effects. Vulnerability is defined as individuals or households who, due to social or economic circumstances, would find it difficult to cope with even minor disruptions to land access or livelihood activities. In line with the ESIA and SEP, gender and household composition were considered during vulnerability screening. However vulnerability determination was based on household-specific capacity and resilience indicators, rather than categorical gender characteristics alone. In accordance with lenders' standards, the vulnerability criteria as deemed appropriate for this project is households:

- With very low income or limited coping capacity - below Romania's national poverty line (approximately RON 4,700/month or 60% of median income); and
- Critically dependent on year-round access to grazing land for their livelihoods.

Both directly affected households are economically resilient, multi-generational, and well-integrated into local social networks. Whilst they are reliant on the access to the pastureland during the grazing season (April to November), they have secure tenure and no indicators of marginalization or extreme poverty.

Although Directly Affected Household 1 (sheep herding) is female-headed, the household has secure access to pasture and livestock assets, multiple working-age members engaged in livelihood activities, diversified income sources, and does not rely on social assistance. The female head of household exercises decision-making authority over land use and livelihood management. On this basis, while gender was explicitly considered, the household does not meet the LRP criteria for vulnerability.

Indirectly affected farmers are mechanized, have stable incomes, and do not meet any vulnerability criteria. While risks such as climate variability exist in the commune, these are unrelated to the project. Elderly or seasonal labour-dependent households are present in Grăniceri but are outside the project area and will not be impacted.

In conclusion, no vulnerable individuals or households were identified within the project's impact area. Therefore, no additional entitlements beyond standard LRP provisions are required for this project.

# 7 Impact assessment

## 7.1 Overview

This chapter assesses potential impacts on land use and livelihoods resulting from the Project's construction activities, specifically the temporary easement and access restrictions. The analysis draws on household interviews, consultations with local authorities, field observations, and updated design information for the underground cable alignment.

The project does not involve physical displacement or permanent acquisition of privately owned land. All impacts associated with the laying of the underground cable is temporary and reversible, limited to the construction phase. Permanent land use is restricted to the grid connection substation, located on unproductive communal land.

Impact mechanisms identified include temporary loss of access along the construction corridor, short-term restrictions on livestock movement during trenching, and minor disruptions for farmers using agricultural roads. These impacts are expected to be short-lived and manageable, with no permanent income loss or structural livelihood damage anticipated.

## 7.2 Affected people's census

The Project applies definitions consistent with international lender requirements for land acquisition and livelihood impacts:

- Directly Affected Persons (PAPs) are households whose livelihood activities will be disrupted by temporary easement and access restrictions during construction, resulting in economic displacement as defined by lender standards.
- Indirectly Affected Persons are individuals or groups who may experience temporary inconvenience (e.g., dust, short-term delays, rerouting) but are not expected to lose income or productive assets.

Based on ESIA and LRP qualitative consultations and field verification, two households, DAH1 a cattle herding family and DAH-2, a sheep herding family - are the only directly affected persons under this definition. Both households are well-established, financially stable, and possess significant productive assets. Their impacts relate to temporary restrictions on livestock movement and access to grazing or farm roads.

Indirectly affected persons include farmers that own, use and cultivate land adjacent to the transmission line route and users of agricultural roads such as DE 553/1. These owners and users may experience short-term access delays and dust during staged works. No income loss is anticipated for these groups. The affected persons' census is summarised in Table 7.1 below.

**Table 7.1: Affected persons census summary**

<b>Name / Group</b>	<b>No. of household members</b>	<b>Main livelihood activity</b>	<b>Land tenure / use</b>	<b>Land to be used by project</b>	<b>Likely impact overview</b> (further details in below subsections)
<b>Directly affected:</b>					
DAH-1	Five (5) (two (2) male / three (3) female)	Dairy & mixed farming	Concession for grazing	50 ha	Temporary grazing and road access restrictions. Road closures or rerouting for 1–2 days during staged works outside of busy agricultural season
DAH-2	Five (5) (two (2) male / three (3) female)	Sheep herding	Concession for grazing	58 ha	
<b>Indirectly affected:</b>					
Approx 20 arable farmers, and road users	Not quantified (due to insignificant impacts)*	Crop cultivation, machinery and transport	Privately owned land cropland	No private cropland to be used; temporary use of public access road	As above for road access constraints

Notes: \*A quantified census of indirectly affected persons was not undertaken due to the minor and insignificant nature of impacts on them.

## 7.3 Land and livelihood impacts

### 7.3.1 Overview

The Project components included in this LRP will result in both permanent and temporary land use changes. Permanent land take is limited to the construction of the grid connection substation, while temporary easements are required for the installation of the underground transmission line and for the consolidation of the agricultural road DE 553/1. Approximately 20 arable farmers plots are located adjacent to the transmission line corridor and they will be indirectly affected; and staged construction (maximum 1km at a time) will be implemented to minimise disruption for land users, farmers, and livestock owners.

The agricultural road DE 553/1, under which the transmission cable will be installed, is public land owned by Grăniceri Commune. All interviewed farmers and livestock owners requested that construction and cable installation works be scheduled strictly outside the agricultural season, between harvest and sowing periods to prevent disruption to ploughing, sowing, irrigation, haymaking, and harvesting activities.

Local council members consulted emphasized that the road must be restored to its original condition after construction, with all construction debris removed and the surface area cleaned with improved pre-construction state. This road is currently an unpaved agricultural access strip, and a local cattle farmer specifically requested it is not gravelled, to avoid foot injuries to livestock.

The agricultural road DE 553/1 is especially important since the width is approximately 10m, providing access for very large agricultural machinery. Many farmers noted that it is the only route wide enough for their oversized equipment, making uninterrupted access during peak farming periods vital for their activities. The anticipated land and livelihood impacts are surmised in Table 7.2 below.

**Table 7.2: Land and livelihood impacts overview**

Project component	Land use area	Ownership	Impact and mitigation overview
Grid connection substation	3.3 ha	Grăniceri Commune	Permanent land usage for the project. Land to be used is currently unproductive and not under use, no livelihood impacts anticipated, as verified with affected communities through LRP consultation
Underground transmission line (3.6km)	14,440 m <sup>2</sup>	Grăniceri Commune, temporary easement granted	<p>Temporary impact of cable installation underneath common agricultural dirt access road DE 553/1, adjacent to ~20 arable plots that will not be directly affected, and underneath pastureland used for seasonal pastoral grazing by the two directly affected household family farms.</p> <p>Access road DE 553/1 is the only route suitable for very large agricultural machinery, so it is important for farmers. It will be restored to its original condition, without graveling, as per farmers' request. Construction will be staged (max. 1km at a time) to minimise temporary impacts.</p> <p>Works will be undertaken November to February to avoid the periods:</p> <ul style="list-style-type: none"> <li>- 1 May to 15 July in accordance with environmental regulations to protect the bird breeding season;</li> <li>- March to October, the locally concessioned grazing season</li> <li>- June and October, the agricultural seed sowing and harvest season.</li> </ul>
Temporary access roads (Socodor, Grăniceri)	Not quantified	Grăniceri Commune, temporary easement granted	Temporary access restrictions for farmers and potential rerouting. Will schedule works in the winter months to avoid grazing, agricultural and bird nesting seasons.

To summarise, impacts on the livelihoods on the directly affected households are temporary and reversible, with no permanent income loss anticipated. Whilst the nature of activities and the operational scale of affected households require consideration of short-term disruptions and associated risks impacts on the two directly affected households are not expected to be significant. While impacts are temporary, the potential subsidy risk requires proactive verification and mitigation, as described below.

### 7.3.2 Sheep farming access restrictions

DAH-2 manages one of the largest pastoral units in the commune, with approximately 1,100 sheep and seasonal grazing patterns across extensive pastureland. The underground cable corridor intersects their traditional movement routes. During trenching, the flock may need to be rerouted for several weeks, requiring additional effort and coordination. The first 200 meters of the underground transmission line crosses pastureland, affecting approximately 1.78 ha, with works taking about 0.01ha from the DAH-2 family's 58ha plot. While the family does not own land within the project footprint, their reliance on mobility makes access restrictions operationally significant.

The DAH-2 family expressed concern that soil disturbance caused by trenching could be detected by the tele-detection system used by the National Agency for Payments in Agriculture (APIA). This system monitors compliance with declared land use for subsidy eligibility. If the disturbed areas are flagged as non-compliant, the household could face penalties or loss of subsidies for up to seven years, which represents a significant income stream for pastoral households.

The Project developer acknowledges this concern and is committed to verifying the expectation that the project will not pose a risk to APIA subsidies and will verify this with APIA and local

agricultural authorities (see LRP consultation section 5.3). This verification will determine whether temporary construction activities could trigger compliance issues and, if so, what measures can be implemented to prevent or mitigate subsidy loss. Potential measures may include formal notifications to APIA, documentation of temporary land use agreements, or provision of support to affected households if subsidy payments are jeopardized. The developer will confirm APIA compliance before works commence and provide written assurance to any affected households.

### **7.3.3 Cattle grazing access restrictions**

The DAH-1 operates a diversified and modernized cattle farm, owning approximately 45 cattle and cultivating around 50ha of land through property and concession. Their concession land grazing routes and farm access roads intersect the construction corridor of the Project. While an alternative path exists, it is currently unsafe until cleared, so they are dependent on road DE 553/1 to access the land in the grazing season. The cable laying work will be scheduled outside this season to avoid significant livelihood impacts.

### **7.3.4 Indirect impacts on nearby farmers and agricultural road users**

Indirectly affected households include the 20 or so farmers cultivating land adjacent to the corridor, and users of agricultural roads such as DE 553/1. These individuals may experience short-term access delays, dust, and rerouting during staged construction works. These works will progress in segments of approximately 1km, minimizing disruption. Although no permanent income loss is currently anticipated for these groups, the Project will implement mitigation measures including advance notice of construction schedules, coordination to avoid peak grazing periods, and provision of temporary access routes where needed as per the targeted consultation that will be undertaken as detailed in section 5.9. Affected individuals will have access to the Project's grievance mechanism and may be eligible for compensation if demonstrable losses occur.

## **7.4 Impacts on Vulnerable Groups**

As explained in section 6.9, surveys and consultations did not identify any vulnerable persons or households within the Project's area of influence. Neither of the directly affected households have very low income or limited coping capacity. DAH-2 is headed by a woman, however this household is financially stable and does not meet vulnerability criteria. DAH-1s financial resilience and mechanization mean they are not considered vulnerable. No additional support measures are required beyond those already planned for all PAPs as described in the next chapter.

## 8 LRP policy, eligibility and entitlements

### 8.1 Overview

This chapter defines who is eligible for compensation and assistance under the Livelihood Restoration Plan and outlines the entitlements available to each category of affected persons. Eligibility is based on the census and asset inventory conducted during the ESIA and LRP process, ensuring that measures are proportionate to project impacts and aligned with international Lenders'. The framework aims to provide fair, transparent, and inclusive support to affected households while preventing opportunistic claims and maintaining consistency with lender requirements.

### 8.2 LRP policy commitments

The Project commits to implementing the LRP in full compliance with international lender standards, specifically IFC Performance Standard 5 and EBRD Performance Requirement 5 related to Land Acquisition and Involuntary Resettlement. These standards establish principles for avoiding or minimizing displacement, ensuring fair compensation, and restoring or improving livelihoods for affected persons which the project is committed to.

Specifically, the LRP policy is guided by the following commitments:

- Avoidance and minimization: Prioritize scheduling and design measures to prevent or minimize economic displacement.
- Compensation at full replacement cost: Provide compensation for any verified income loss or asset damage without deductions for depreciation or salvage value.
- Meaningful consultation: Engage affected persons and stakeholders in a transparent, inclusive manner throughout planning and implementation.
- Accessible Grievance Mechanism: maintain a culturally appropriate, transparent grievance process that does not restrict judicial remedies.
- Monitoring and adaptive Management: Track implementation, verify outcomes, and apply corrective actions where needed.
- Livelihood Restoration: If any unforeseen negative livelihood impacts are experienced, the Project will support affected persons in restoring or improving their pre-project living standards through tailored measures, if avoidance cannot be fully achieved.
- Special Consideration for vulnerable groups: Identify and support vulnerable individuals or households who may be disproportionately affected, including if any are identified during implementation through monitoring activities.

These principles underpin the eligibility framework and entitlements described in the following sections.

### 8.3 Eligibility principles

Eligibility for support under this LRP is based on the household census and field consultation completed to inform the LRP. These serve as the eligibility anchor for all entitlements. The following categories apply:

- Category A – Directly Affected Persons: Households whose livelihood activities will be disrupted by temporary land take or access restrictions during construction.

- Category B – Indirectly Affected Persons: Farmers and road users who may experience temporary inconvenience (e.g., dust, short-term delays, rerouting) but are not expected to lose income or productive assets.
- Category C – Non-Eligible: Persons or activities emerging with no documented use prior to the census.

These categories form the basis for determining eligibility for all entitlements and support measures under this LRP. I

A full vulnerability screening was conducted and no vulnerable persons identified, however if any vulnerable person is identified through GRM or community channels, they will be added to the eligibility list, and tailored assistance will be provided.

## 8.4 Entitlements matrix

The entitlement matrix in Table 8.1 below outlines the categories of eligible PAPs, the types of impacts they may experience, eligibility criteria, and the corresponding compensation and support measures to be provided under the LRP. All entitlements are designed to meet or exceed the Lenders' requirements. This matrix will be updated if additional PAPs are identified. All entitlements will be implemented under the principles of equity, transparency, and sustainability, ensuring that affected persons are supported in restoring or improving their livelihoods and living standards.

**Table 8.1: Entitlements matrix**

Impact Type	Description	Eligibility Criteria	Entitlements	Verification & Notes
Temporary loss of grazing access	Restricted access during trenching	Directly affected Leaseholders/concession holders of directly affected pastureland	<p>Primary measure: Avoidance through scheduling works in winter months (Nov–Feb) outside grazing and agricultural seasons, with <math>\geq</math> 60 days advance notice.</p> <p>Contingency: If avoidance fails, the project will:</p> <ul style="list-style-type: none"> <li>pay cash compensation for temporary grazing interruption using herd-per-day formula (€0.55/sheep/day; €2.50/cow/day; €100/day labour)</li> <li>restore pastureland through reseeding and soil stabilization at project cost, and</li> <li>reimburse any verified subsidy losses under APIA schemes based on official rates and documented penalties.<sup>10</sup></li> </ul>	<p>Commitment to winter scheduling documented.</p> <p>Herd size and feed cost to be verified before any payment through direct engagement with affected households, supported by local authority confirmation and market price checks. Documentation will include signed statements and photographic evidence prior to payment.</p> <p>APIA compliance confirmed prior to works.</p>
Temporary restriction on agricultural road access	Limited access for machinery and livestock	Farmers and users of agricultural road DE 553/1	<p>Advance notice; traffic management; full road restoration (no graveling).</p> <p>If any provable loss occurs, full compensation at full replacement cost will be provided on a case-by-case basis.</p> <p>Temporary alternative routes will be identified and agreed in consultation with indirectly affected road users.</p>	Route mapping; consultation records; restoration verified by Town Hall.
Indirect disturbance (dust, noise)	Minor inconvenience during works	Farmers adjacent to corridor	Advance notice; and the project-level grievance mechanism (GRM) is available to <b>all</b> affected persons for any concerns related to land access, compensation, or livelihood restoration. Details are provided in Chapter 5.	Consultation records; grievance log.
Unforeseen impacts	Any impact not identified	All PAPs, including any newly identified vulnerable PAPs (as per criteria in section 6.9)	Case-by-case mitigation and compensation.	Managed through GRM; documented in monitoring reports. Where monitoring or the grievance mechanism identifies vulnerable and/or severely impacted

<sup>10</sup> Daily feed-cost assumptions (€0.55/sheep; €2.50/cow) are conservative estimates drawn from Romania’s recent feed price trends and typical livestock systems. Infoferma.ro (June 2025) highlights a 25 % rise in animal nutrition costs and an 18% jump in corn/barley prices between 2023–2024 (<https://infoferma.ro/en/article/cresterea-costurilor-lafuraje-si-impactul-asupra-industriei-carnii-in-romania-edCcJp78>). The European Commission’s Agri-food Data Portal provides monthly live animal and feed commodity prices (<https://agridata.ec.europa.eu/extensions/DataPortal/prices.html>). FADN cost of production data further supports standard practices for mixed crop–livestock farms (<https://agridata.ec.europa.eu/extensions/FarmEconomyFocus/FADNDatabase.html>) Labour allowance (€100/day) aligns with Romania’s rural wage and labour cost data, reported at roughly €10.8–11.8/hour total in Eurostat (2023–2024) (<https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=662541>). Subsidy reimbursement is based on the APIA agri-environment payment rate (€159/ha), per Romanian Ministry of Agriculture documents (<https://apia.org.ro/https://apia.org.ro/>). All are used here for budgeting and will be verified during implementation via direct engagement with affected households and local market checks.

Impact Type	Description	Eligibility Criteria	Entitlements	Verification & Notes
				households or individuals, additional targeted assistance will be provided on a case-by-case basis to avoid disproportionate impacts and support livelihood resilience, in line with IFC PS5 and EBRD PR5.

## 8.5 Cut-off date

For the purposes of this LRP, a formal cut-off date has been established as 31 October 2025, corresponding to the completion of the census and socio-economic consultations with directly affected households. Eligibility for LRP entitlements is limited to Project Affected Persons identified on or before this date.

The cut-off date will be communicated to affected and potentially affected stakeholders during the LRP disclosure process, including through the public information brochure and engagement activities undertaken prior to construction. Any persons occupying or using land within the Project area after the cut-off date will not be eligible for compensation or livelihood restoration assistance under this LRP, unless otherwise required to address unforeseen impacts identified through monitoring or the grievance mechanism.

## 9 Livelihood restoration strategy

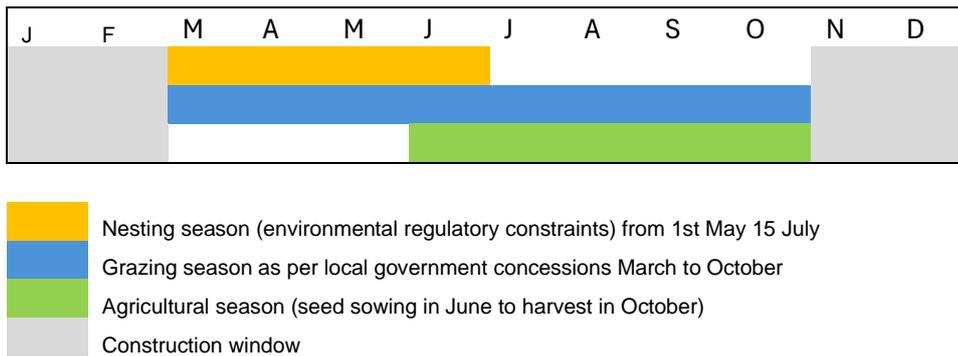
### 9.1 Overview

This chapter details the livelihood restorations strategy, the primary objective of which is to ensure that all households and land users affected by the Project maintain continuity of their economic activities and if needed, restore their income to pre-project levels. This strategy is aligned with the entitlements matrix in the previous chapter, and it reflects lenders, prioritizing avoidance and minimization of displacement impacts, followed by compensation and restoration where avoidance is not possible.

### 9.2 Scheduling and access management

The approach adopted for this project is based on the principle of impact avoidance as the priority. Construction works for the underground cable and associated infrastructure will be scheduled during the winter months of November to February outside of the grazing season (April to November) and peak agricultural periods, as summarised in Figure 9.1 below.

**Figure 9.1: Seasonal constraints and construction scheduling calendar**



The scheduling commitment is central to the strategy and will be monitored throughout implementation. By avoiding works during the grazing season, the project aims to eliminate the need for cash compensation for temporary loss of pasture access. However, recognizing that unforeseen delays or operational constraints may occur, the strategy includes a contingency mechanism. If works cannot be fully confined to the winter period and temporary restrictions on grazing access arise, compensation will be provided based on a transparent and pre-agreed formula.

The most effective measure to prevent economic displacement is strict adherence to the construction schedule during the winter months. The project commits to completing trenching and cable installation outside the grazing season and peak agricultural activities, implementing staged construction (maximum 1km segments), and providing at least 60 days' advance notice to affected households and local authorities before works commence in any segment.

### 9.3 Contingency compensation and supporting measures

In addition to scheduling, the livelihood strategy commits to these additional measures:

- **Contingency compensation framework:** If avoidance cannot be fully achieved, compensation will be calculated using a herd-per-day formula based on the following assumptions:
  - DAH-1 (~45 cattle) at €2.50 per head per day; and
  - DAH-2 (~1,100 sheep) at €0.55 per head per day;
  - €100 per day for additional labour.

For example, if access is restricted for seven days for sheep and three days for cattle, the estimated compensation would be €4,235 for sheep, €338 for cattle, and €1,000 for labour, totalling €5,573. Herd size and feed cost to be verified before any payment through direct engagement with affected households, supported by local authority confirmation and market price checks. Documentation will include signed statements and photographic evidence prior to payment.

- **Subsidy protection:** The project acknowledges the importance of agricultural subsidies under APIA schemes. To prevent any loss of payments due to temporary soil disturbance, the developer will notify APIA in advance of works, confirm compliance requirements before construction, and reimburse any verified subsidy losses or penalties in full.
- **Pastureland rehabilitation:** Any disturbed pastureland will be restored to its original condition or better immediately after construction, including reseeding, soil stabilization, and removal of construction debris. Restoration will be verified by the Town Hall and affected households before sign-off.
- **Agricultural road restoration:** the agricultural road DE 553/1 will be restored to its pre-construction condition, respecting farmers' request to avoid graveling to prevent cattle injuries. Restoration will include grading and cleaning, with improvements where feasible.
- **Engagement and grievance management:** The project will maintain continuous engagement with affected households and local authorities throughout implementation. A grievance mechanism will remain operational, providing accessible channels for complaints and ensuring resolution within 30 days.
- **Completion:** Livelihood restoration will be considered complete when grazing and agricultural access routes are fully restored, no outstanding subsidy issues remain, and affected households confirm satisfaction with restoration measures. Verification of these criteria will be undertaken by the Lenders' Technical Advisor (LTA) as part of the Detailed Review and Lender Monitoring process, in accordance with the monitoring and evaluation framework described in Chapter 11. The developer will cooperate fully with the LTA to provide access and documentation required for this independent verification.

# 10 Implementation arrangements, schedule & budget

## 10.1 Overview

This chapter sets out the arrangements for implementing the LRP, including the roles and responsibilities of the entities involved, the indicative schedule for key activities, and the budget framework. The purpose is to ensure that commitments made under the LRP, particularly those relating to compensation, livelihood restoration measures, and monitoring, are delivered in a timely and coordinated manner. Implementation will be aligned with the construction programme and lender and regulatory requirements, with provisions for adjustment should project design or impact assumptions change.

## 10.2 Roles and responsibilities

Implementation of the Livelihood Restoration Plan will require close coordination between the developer, sponsor, local authorities, contractors, and the lenders' monitoring team. The overall responsibility for delivering the commitments set out in this plan rests with the Project Developer, supported by the Sponsor and other stakeholders. Specific roles and responsibilities are:

- **Project Developer (West Power Investments SRL):** Responsible for implementing all LRP measures in compliance with lender standards. This includes disclosure, engagement with affected persons, and ensuring land and road restoration. The developer will maintain the grievance mechanism and coordinate with contractors.
- **Sponsor (Rezolv Energy):** Provides strategic oversight and ensures alignment with sustainability commitments. The sponsor secures funding for all LRP activities, including contingencies, and reports progress to lenders while supporting external monitoring requirements.
- **Local Authorities (Grăniceri Commune):** Facilitate communication with affected households, confirm land tenure and grazing arrangements, and assist with scheduling works to avoid peak agricultural and grazing seasons. They will also validate restoration works and provide official sign-off.
- **Contractors:** Implement construction scheduling commitments, ensuring works occur in winter months (November–February) to avoid grazing and agricultural seasons. They will manage traffic and access during works and restore land and roads to pre-construction condition.
- **LRP Team (Consultant):** Provide ongoing technical support to the developer during implementation, including advice on scheduling, verification of herd size and feed costs, and documentation of entitlements. The team will also assist with monitoring and reporting to lenders, ensuring compliance with Lenders' requirements.
- **Lenders' Technical Advisor (LTA):** Conduct independent verification of LRP implementation as part of lender monitoring. This includes reviewing documentation, confirming compliance with Lenders' requirements and validating completion criteria. The developer will provide full cooperation.

### 10.3 Implementation schedule

The implementation of the LRP will ensure that all measures are in place before any land access restrictions occur and construction activities commence. Activities will begin with disclosure of the LRP followed by agreement on impacts, entitlements and impact avoidance, mitigation measures and scheduling.

Monitoring will run throughout the process, with internal reviews at regular intervals and external verification at agreed milestones. A detailed schedule will be prepared in coordination with the construction plan and disclosed to stakeholders once finalised.

An indicative implementation schedule presented in Figure 10.1 below will be confirmed following completion of LRP disclosure and lender clearance. Construction sequencing will be informed by the environmental and livelihood risk management measures set out in Section 9.2, including consideration of nesting periods and seasonal grazing and agricultural monitoring requirements. The detailed construction programme will be finalised through contractor planning to balance these considerations with project delivery requirements.

**Figure 10.1: LRP indicative implementation schedule**

Activity	Dec 2025	Jan 2026	Feb 2026*	Mar 2026	April & beyond
Draft LRP submission to lenders and finalisation					
LRP disclosure to affected communities					
Implement LRP alongside cable laying					
Monitoring & external LTA verification					

Notes: Indicative timings are subject to confirmation during detailed construction planning, taking account of environmental and livelihood risk management measures described in Section 9.2.

Legend:

- LRP review and finalization phase
- LRP implementation phase

### 10.4 Budget and funding

The implementation of the LRP will be financed through a dedicated, ring-fenced budget provided by West Power Investments SRL and Rezolv Energy. This budget will cover all costs associated with compensation, livelihood restoration measures, administrative expenses, and monitoring activities. The allocation will include provisions for external monitoring and evaluation to meet lender requirements.

A detailed line-item budget will be finalized once the LRP is approved for implementation and will be aligned with the entitlements matrix and the construction schedule. Indicative cost categories include compensation for temporary land access and grazing restrictions, reimbursement for subsidy losses, support for land rehabilitation, livelihood restoration inputs, and costs for stakeholder engagement and grievance management. Administrative costs will cover staffing, logistics, and reporting, while monitoring costs will include internal reviews and third-party audits. An indicative budget is presented in Table 10.1 below.

**Table 10.1: Indicative LRP budget**

<b>Category</b>	<b>Indicative cost (€) ring-fenced budget</b>	<b>Notes</b>
Contingency compensation for grazing compensation costs	EUR 10,000	If avoidance cannot be fully achieved, compensation will be calculated using the herd-per-day formula described in the previous chapter,
Potential subsidy loss reimbursement	EUR 4,000	Estimated to cover potential penalties or lost payments under APIA schemes if temporary soil disturbance triggers compliance issues.
Land rehabilitation and potential livelihood restoration	EUR 10,000	Includes costs for restoring disturbed pasture and agricultural land to pre-construction condition, including reseeded and soil stabilization, and feed compensations, if needed
Stakeholder engagement & grievance management	EUR 2,000	
Administrative costs	EUR 3,000	
Internal monitoring	EUR 5,000	The cost for the external LTA monitoring and evaluation is excluded from this.
Subtotal	EUR 34,000	
Contingency (10%)	EUR 3,400	Calculated at 10% of subtotal to cover unforeseen costs.
<b>Total</b>	<b>EUR 37,400</b>	Sum of all categories including contingency.

## 10.5 Change management

The LRP will be treated as a living document and updated as necessary to reflect changes in project design, schedule, or impact assumptions. Any modifications to the construction programme that affect land access or timing of works will trigger a review of the implementation schedule and associated measures. If additional affected persons are identified or if impacts differ from those anticipated, the entitlement framework and compensation provisions will be revised accordingly. Updates will be disclosed to stakeholders and communicated to lenders to ensure continued compliance with Lenders' requirements. All changes will be documented, approved by the Project Developer, and incorporated into monitoring reports.

# 11 Monitoring, evaluation, and completion

## 11.1 Overview

Livelihood restoration monitoring will be undertaken by the Project social team and implemented in a time-bound and proportionate manner, reflecting the temporary and localised nature of the identified impacts. Monitoring is designed to verify that agreed access management measures are implemented, that land and access routes are reinstated following construction, and that affected households can resume normal livelihood activities without residual impacts.

Specifically, it will identify any gaps or improvements needed, and where livelihood impacts are identified, additional measures will be undertaken to ensure affected groups can restore or improve their livelihoods to pre-project levels. Monitoring will be participatory, involving affected communities and relevant stakeholders, and will provide transparency and accountability throughout implementation.

## 11.2 Internal monitoring

Internal monitoring will be carried out by project staff to review the effectiveness of LRP implementation and adjust as needed. Monitoring will focus on access continuity, grievance resolution, and satisfaction of affected households. Monitoring will include consultations with affected farmers and other stakeholders, tracking progress against agreed indicators, and maintaining gender-disaggregated data. Key performance indicators (KPIs) that will be tracked and reported on are summarised in Table 11.1 below.

**Table 11.1: Monitoring key performance indicators**

Monitoring parameter	Key Performance Indicator (KPI)	Notes
Consultation	Number of meetings with affected farmers and stakeholders	Engagement frequency will be tracked
Grievances	Number of grievances received, % resolved, average resolution time	Disaggregated by type and gender
Community access	% of agricultural roads restored to pre-construction condition	Verify through site inspections
Grazing Continuity	% of days grazing routes remain open during construction	Compare to agreed schedule
Seasonal construction constraints	% of construction days occurring within the winter window (Nov–Feb)	Compare to documented commitment to winter scheduling.
Advance notice of access disruption	Advance notice provided to all affected farmers and agricultural road users prior to construction works	To be confirmed through disclosure records and engagement logs during pre-construction and construction
Alternative access arrangements	Temporary alternative access routes identified and agreed with affected users where access disruption cannot be avoided	Alternatives to be agreed in advance of works through direct engagement and documented by the Project
Access reinstatement	All temporarily affected access routes reinstated to pre-construction condition or better	To be verified following completion of works through site inspection and stakeholder confirmation
Livelihood outcome verification	Confirmation that PAP livelihoods have been maintained or restored following reinstatement	To be verified through monitoring six months after completion of land reinstatement and access restoration

Monitoring parameter	Key Performance Indicator (KPI)	Notes
APIA subsidy status	% of farmers with verified subsidy status	To be verified through monitoring before, during, and after construction. <sup>11</sup>

The timebound monitoring schedule is presented in Table 11.2 below.

**Table 11.2: Internal monitoring schedule**

Monitoring stage	Timing	Focus
Baseline monitoring	Prior to commencement of construction works	Confirm baseline grazing access, movement routes, and agreed avoidance and scheduling measures with all identified PAPs
Construction monitoring	Monthly during construction works along the cable corridor	Verify implementation of access management measures, adherence to construction phasing, and record any livelihood disruption or grievances
Post-construction monitoring	Quarterly following completion of construction and land reinstatement works	Verify completion and effectiveness of land reinstatement and restoration of grazing access and movement routes
Final livelihood verification	Six months after completion of land reinstatement and access restoration works <sup>12</sup>	Confirm that livelihoods have been restored or maintained and document PAP feedback and satisfaction

### 11.3 External monitoring and evaluation

External review of LRP implementation will not be conducted as a standalone activity. Instead, it will form part of the lenders' technical advisory monitoring process. This integrated approach ensures independent oversight while avoiding unnecessary duplication, given the limited and temporary nature of project impacts.

The review will include:

- Verification of internal monitoring reports and progress against commitments
- Assessment of grievance mechanism functionality
- Confirmation that affected households have maintained access to grazing and agricultural routes
- Identification of any corrective actions needed to ensure objectives are met.

The evaluation will focus on:

- Effectiveness of measures to maintain grazing and agricultural access
- Functionality of the grievance mechanism
- Satisfaction of affected households with restoration outcomes
- Identification of lessons learned for future projects

Findings will be documented in the lenders' periodic monitoring reports and shared with the project team for adaptive management and to guide any corrective actions.

<sup>11</sup> APIA subsidy status to include any penalties or deductions.

<sup>12</sup> For the purposes of this LRP, completion of land reinstatement and access restoration refers to the point at which all temporarily affected land and access routes have been reinstated to pre-construction condition or better.

## 11.4 Database management and reporting

The project will maintain a secure database of all affected households and individuals eligible for livelihood restoration. This database will record baseline information, entitlements, and monitoring results. Data collected during internal monitoring will be used to update profiles and track progress. Privacy and confidentiality will be safeguarded. Information will only be shared for approved purposes and will not be disclosed publicly.

Reporting will be proportionate to the scale of impacts. The project team will prepare bi-annual progress summaries during construction, covering implementation status, monitoring results, and any corrective actions. These summaries will be included in the lenders' technical monitoring reports rather than as standalone LRP reports.

## 11.5 Adaptive management

Monitoring and evaluation results will be used to identify any gaps or delays and implement corrective actions promptly. This ensures flexibility and continuous improvement in achieving livelihood restoration objectives. Adjustments will be proportionate to the scale of impacts and will be documented in progress reports and lender monitoring updates. Corrective actions will be agreed with the project team and documented in lender monitoring reports.

# Annexes

# A. Directly Affected Peoples Census and Impact Survey

## Introduction:

The purpose of this survey was to understand possible effects on land use and livelihoods to inform the development of a Livelihood Restoration Plan (LRP) eligibility and any support measures.

The data collected includes information about household composition, basic socioeconomic indicators of affected people, land use and livelihoods, photographs and GPS locations, and is protected in accordance with Regulation (EU) 2016/679 (GDPR).

The questions set out below were intended as guiding prompts to structure household discussions and were applied flexibly, allowing for open dialogue and follow-up questions as appropriate, rather than as a closed or prescriptive interview format.

## Preliminary rapid field observations

PAP's name: \_\_\_\_\_

Interview time/ date: \_\_\_\_\_

Location (GPS): \_\_\_\_\_

Short description of the site \_\_\_\_\_

*Impact period (to be filled based on project or engineering data, do not ask respondents.*

*According to project information, the estimated duration of impacts is:*

(\_\_\_) Days

(\_\_\_) **Weeks**

(\_\_\_) Months

Enumerator to note any assets that could be disturbed:

1. Fences
2. Trees or shrubs planted
3. Water troughs or animal drinking points
4. Drains or small channels
5. Temporary structures (please describe): \_\_\_\_\_
6. Permanent structure (please describe): \_\_\_\_\_
7. Other (please describe): \_\_\_\_\_  
\_\_\_\_\_

Site visit photos, field notes, sketches (where useful), GPS coordinates to be collected as evidence

## Questionnaire

### 1. Identification & consent

1.1. Do you agree that the data collected during this interview may be used for social analysis purposes, to inform the development of a Livelihood Restoration Plan (LRP) and related Dama PV project documentation, under conditions of confidentiality and without being made public individually?

This data will be protected in accordance with Regulation (EU) 2016/679 (GDPR).

1. Yes, I agree.
2. Yes, but without photos.
3. Yes, but without GPS data
4. No, I do not agree. STOP
5. You may skip any question or stop at any time.

1.2. May we contact you later if clarification is needed?

Yes/no

Contact details (if willing) \_\_\_\_\_

1.3. Name of the respondent (if willing) \_\_\_\_\_

1.4. Sex (M/F)

1.5. PAP ID (to be assigned by enumerator, not requested from respondent) \_\_\_\_\_

1.6. How many members live permanently in the household? \_\_\_\_\_

Household member category:	Number:
Women	
men	
Persons aged 0-15	
persons aged 16-64	
persons aged 65	
persons with serious/chronic health problems	
persons with physical or mental disabilities	
Persons belonging to the Roma community	
Persons in long time unemployment	

## 2. Land use and activity

2.1 What is your right or permission to use this land:

1. I own this land
2. I lease or rent it from the government
3. I lease or rent it from a private owner
4. I use it informally with verbal permission
5. I use it without forma permission (open or communal land)
6. Other (please specify) \_\_\_\_\_

2.2. What is the main way you use this land?

1. Grazing
2. Herding (moving animals through)
3. Farming or crop cultivation
4. Other (please specify): \_\_\_\_\_

2.3. Approximately how much land do you use here?

1. Less than 0.5 ha
2. 0.5–2 ha
3. 2–5 ha
4. More than 5 ha
5. Not sure

2.4. How often do you use this area?

1. Daily
2. Seasonally (specify which months each year) \_\_\_\_\_
3. Occasionally / ad-hoc (specify approx.. frequency weekly, monthly, rarely):  
\_\_\_\_\_

2.5. Does your area of use overlap with, or lie next to, the planned cable route or construction zone? (show map)

1. Overlaps with the route
2. Adjacent to the route (touches boundary)
3. In the same locality but not adjacent
4. Far from the route / not affected

## 3. Livestock and livelihood context

3.1. What types of animals do you currently own?

Livestock	Number:
Sheep	
Goats	

Cattle	
Horses	
Other (please specify)	

3.2. Do any of your **feeding, watering, or resting areas** fall within or near the construction zone? (show map, record locations on map)

1. Yes, within the construction zone
2. Adjacent to the construction zone
3. No, all are outside the affected area

3.3. If yes, which type of area is affected?

1. Feeding area
2. Watering point
3. Resting area
4. Other (please specify): \_\_\_\_\_

3.4. Once construction is completed, do you expect to continue grazing in this area?

1. Yes, immediately
2. Yes, but only after some time
3. Not sure
4. No, I will use another area

#### 4. Anticipated construction interaction

4.1. What kinds of changes do you think might happen in this area during construction?

1. Limited access or movement
2. More noise or dust
3. More vehicles or activity in the area
4. Presence of workers or equipment
5. Other (please specify): \_\_\_\_\_

4.2. How long do you think these changes might last?

1. A few days
2. Several weeks
3. Several months
4. Don't know

4.3. How might these changes affect you or your usual activities?

1. Temporary relocation (move animals or activities elsewhere)
2. Change in timing (adjust grazing, work hours, etc.)
3. No major effect expected
4. Other (please specify): \_\_\_\_\_

#### 5. Assets and facilities at risk

5.1. Are there any of the following located **within or near the land project route or construction zone**?

1. Animal shelters or sheds
2. Fences
3. Water troughs or feeding areas
4. Hay, fodder, or other stored materials
5. Small buildings or storage rooms
6. Other (please specify): \_\_\_\_\_

5.2. Are any of these assets currently in use?

1. Yes (please describe): \_\_\_\_\_
2. No

5.3. Would any of them need **temporary protection, relocation, or reinstatement after construction**?

1. Yes (please describe): \_\_\_\_\_
2. No

## 6. Vulnerability and communication

6.1. Are there any household conditions that might make it harder for you to adapt to temporary construction impacts?

1. None
2. Elderly or limited mobility household members
3. Disability or chronic illness
4. Single earner or limited income
5. Caring for dependents (children, elderly)
6. Other (specify): \_\_\_\_\_

6.2. What is your **preferred way to receive project updates or notices**?

1. In-person visit or through the Community Liaison Officer (CLO)
2. Phone call
3. WhatsApp message
4. SMS / text message
5. Printed letter or notice
6. Through the mayor's office or local council
7. Other (specify): \_\_\_\_\_

## 7. Final enumerator notes and documentation

7.1 Record any visible structures, materials, or installations that may be affected

7.2 Record visible land condition and current use any discrepancies with cadastral records

7.3 Record other users identified nearby

7.4 Take and label relevant photos (photo numbers: \_\_\_\_\_)

7.5 Sketch approximate locations relative to the route.

7.6 Any final notes

## **B. Mayor / Commune Representative Guiding Interview Questions**

1. Can you confirm whether any residents or herders regularly use the land along the cable route?
2. Are there any known leaseholders or informal users of the grazing land near the northern end of the route?
3. Approximately how many people depend on livestock grazing in this area?
4. Are there any vulnerable households (elderly shepherds, low-income families) that might need extra assistance if grazing access is restricted during construction?
5. What arrangements would be most practical to notify users before construction starts? (e.g., via the commune office, local leaders, or direct calls)
6. Are there alternative grazing areas nearby that could be used temporarily if needed?
7. What timing or local events (harvest, grazing cycle, religious holidays) should be avoided to minimize disturbance?
8. Who in the commune should the project team coordinate with during the site works?
9. Would the commune support a short follow-up meeting after construction to confirm restoration?

### **Socioeconomic baseline questions**

10. Roughly how many households in the commune rely mainly on livestock or mixed farming for their income?
  
11. For typical herder households here, what is the usual herd size range (small, medium, large)?
  
12. Are there particular groups that might be more vulnerable to temporary disruption (elderly-headed households, Roma, low-income families)?
  
13. During which months is grazing or fodder availability most limited — when would short-term access restrictions be most difficult?

## C. Local Council Representative Interview Questions

1. Has the council been informed about the planned cable route and temporary access works?
2. Does the council manage or lease any of the affected land parcels?
3. Are there any known issues or disputes over use of the grazing land along the route?
4. How can the project best coordinate with the council to notify residents or land users before construction?
5. Has the council identified any particularly vulnerable households or individuals who rely on these lands?
6. Would the council help verify the list of affected land users or relay notices about construction timing?
7. Are there any specific periods when works should be avoided?
8. Does the council have any recommendations to ensure smooth access and minimize temporary disruption?

### Socioeconomic baseline questions

9. Roughly how many households in the commune rely mainly on livestock or mixed farming for their income?

10. For typical herder households here, what is the usual herd size range (small, medium, large)?
  
11. Are there particular groups that might be more vulnerable to temporary disruption (elderly-headed households, Roma, low-income families)?
  
12. During which months is grazing or fodder availability most limited - when would short-term access restrictions be most difficult?

