



**Pagegiai wind farm project**

**Human Rights Screening**

**2023**

## Purpose and Objectives

The purpose of the human rights screening step is two-fold: to understand the human rights context in which the Pagegiai wind farm project is situated, without going into detail regarding specific human rights impacts of the proposed project; and to establish a high-level understanding of the Pagegiai wind farm project and its activities.

## Project Description

The company UAB LT Energija, owned by UAB Renerga, is developing an onshore wind farm project in Pagėgiai municipality. The project comprises of 40 wind turbine generators for a total proposed installed capacity of 264MW. Pagėgiai onshore wind farm will generate about 0.8 TWh of electricity per year, which is equivalent to about 1/14th of the electricity consumed in Lithuania. Once implemented, the wind farm would become the largest in the Baltic States. Other components include 100kV transformer substation, access roads, and underground cable and transmission lines. Commercial operations date of the onshore wind farm is estimated at 01 June 2026 with a planned operating period of 30 years.

The project is being developed in the municipality of Pagėgiai, Natkiškės, Pagėgiai, Lumpėnai and Vilkyškės villages. The project area is dominated by agricultural use. There are individual residential houses and small villages located within the project footprint - the closest residential property from the Pagegiai wind farm turbine to a residential property (approximately 470 m.)

Pagegiai wind farm project can be categorized as Category B (moderate risk) project in International Financial Corporation environmental and social categorization methodology. The project is located approximately 80 kilometers inland from the Klaipėda port on the Lithuanian west coast in the municipality of Pagegiai, approximately 3 km from Natura 2000 protected site and approximately 1 km from Rambynas national park. Pagegiai wind farm project has moderate to low risks and impacts upon the environment and on the social conditions of the local communities. These risks and impacts are in most cases reversible and are easy to mitigate through appropriate measures (compensation to local farmers for using the agricultural land for construction of wind turbines; lifting artificial nests for birds and bats to save them from the impacts of the wind farm, etc.). However, being within 3 kilometer of a sensitive area (Natura 2000) means that the Pagegiai wind farm project should be classified as category B according to International Financial Corporation environmental and social categorization methodology.

## Affected Right-Holders

The affected right-holders of the Pagegiai wind farm project will be the own workers of LT Energija, contractor workers and local communities (including local landowners).

The main Pagegiai wind farm project contractors are:

- Electrical Balance of Plant contractor which undertakes the construction and installation works of the electrical part of the Project - Stiemio, UAB
- Construction Balance of Plant contractor which undertakes the works of the infrastructure construction part of the Project - Merko statyba, UAB
- Turbine Supply Agreement contractor which undertakes the delivery and installation of the wind turbines – Nordex Lithuania, UAB
- Developer of the project - LT Energija.
- Construction Technical Supervisor of the Project - SDTP, MB.
- Construction Project Management contractor of the Project - BE Constructive, UAB

The country of origin and working patterns for the Pagegiai wind farm project workforce will differ by contractor. The following description is the current expectation for each contractor, though this may be subject to change.

Electrical Balance of Plant contractor (Stiemio, UAB), Construction Balance of Plant contractor (Merko statyba, UAB), Construction Technical Supervisor of the Project (SDTP, MB), Construction Project Management contractor of the Project (Be constructive, UAB) and the developer of the project (LT Energija) will be Lithuanian workers. Turbine Supply Agreement contractor (Nordex Lithuania, UAB) will be international workers from various countries of EU (Germany, Poland, Lithuania, etc.)

On-site accommodation will not be required since the workforce of contractors can be adequately accommodated in nearby villages and towns. Contractors will be responsible for providing suitable housing for their workforces.

The main communities, identified in the Project EIA, that will be affected directly and indirectly by Pagegiai wind farm project are:

- Lumpėnų strazdas community
- Vilkyškiai village community
- Natkiškiai village community
- Piktupėnai village community
- Kentriai village community
- Pagėgiai Village community
- Lumpėnai Village community

Almost 30 local landowners will be affected by the Pagegiai wind farm project.

## Human Rights Baseline

Understanding the human rights context for a Pagegiai wind farm project requires review of the regulatory, legal, institutional and policy framework in Lithuania.

Main national laws regulating various human rights issues are:

- Constitution of the Republic of Lithuania
- Civil Code of the Republic of Lithuania
- Law on Equal Opportunities
- Law on Equal Opportunitie for Women and Men
- Labour Code of the Republic of Lithuania
- Law on Employment
- Law on Safety and Health at Work
- Law on the State Labour Inspectorate
- Procedure for the organization of employment, work and vocational training of persons under the age of eighteen, the description of the conditions of employment of children
- Law on Environmental Impact Assessment of the Proposed Economic Activity

Lithuania has ratified many international human rights treaties, issued by the United Nations and all eight treaties of the ILO Fundamental Conventions<sup>1</sup>. Lithuania is ranked 35<sup>th</sup> respectively (out of 191 countries) in the United Nation's Human Development Index 2021-2022<sup>2</sup>. The Equator Principles categorize Lithuania as Designated Countries<sup>3</sup>, defined as "those countries deemed to have robust environmental and social governance, legislation systems and institutional capacity designed to protect their people and the natural environment".

## Local context

At the beginning of 2022, about 7,236 inhabitants lived in the territory of Pagėgiai municipality.

In 2022, the percentage of women of childbearing age (15–49 years) in the Pagėgiai municipality was 18.76%, while in Lithuania, it was 21.03%. In 2022, in terms of age structure, the largest portion of the population in the Pagėgiai municipality was in the 45–64 age group, accounting for 32.34%, while in Lithuania, it was 29.03%. In Lithuania, the largest portion of the population was in the 18–44 age group, accounting for 33.27%, whereas in the Pagėgiai municipality, it was 29.89%.

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<sup>1</sup> [https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200\\_COUNTRY\\_ID:102752](https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102752)

<sup>2</sup> [https://hdr.undp.org/system/files/documents/global-report-document/hdr2021-22pdf\\_1.pdf](https://hdr.undp.org/system/files/documents/global-report-document/hdr2021-22pdf_1.pdf)

<sup>3</sup> <https://equator-principles.com/about-the-equator-principles/#DesignatedNon-DesignatedCountries>

No.	Indicator	Number of inhabitants (families)*
1.	Population	7236
1.1.	in the city	1740
1.2.	in the village	5496
1.3.	residents of retirement age (65+)	1441
1.4.	population of working age (18-64 years)	4571
1.5.	adults with disabilities (the number is constantly changing)	~ 715
1.6.	children	School-aged children, including: <ul style="list-style-type: none"> <li>- 677 students attending educational institutions (grades 1-12);</li> <li>- 63 pre-school education provided to children.</li> <li>- 156 – preschool education is provided.</li> </ul>
1.7.	children with disabilities (numbers constantly changing)	45
2.	Families with social problems	41
2.1.	and the children growing up in them	76
	Observed families	13

\*Data from the Department of Statistics, Pagegiai Municipality Administration / 2022

According to the information of the Tauragė branch of the Employment Service in Pagėgiai municipality on the 1<sup>st</sup> of January 2023, 371 job seekers were registered. On the 1<sup>st</sup> of January 2023 the unemployment rate in the country was 8.9, in Tauragė municipality the unemployment rate was 8.8 percent. The unemployment rate in Pagėgiai municipality is 8.1 percent. Registered unemployment among young people (16-29 years) in Tauragė County is 4.7%, in Pagėgiai Municipality 2.5%.

The poverty level in Pagėgiai Municipality reached 33.4% in 2022, and it reached 28.9% in 2023. It is estimated that Lithuania's average poverty rate in 2023 will be 19.9%<sup>4</sup>.

According to the data of the study "Map of Corruption in Lithuania 2022/2023" initiated by the Special Investigation Service (STT), the most corrupt institutions, according to residents and business leaders, continue to be healthcare institutions, the Seimas, the judiciary, municipalities and political parties<sup>5</sup>. However, there are no statistical data available on the corruption level (court cases, etc.) in the Pagegiai municipality. With an average score of 66 out of 100, Western Europe and the European Union (EU) is once again the top-scoring region in the Corruption Perceptions Index (CPI). Lithuania is ranked in 33 place out of 180 total countries, which were assessed in the Corruption Perceptions Index 2022 by Transparency International<sup>6</sup>.

There are no large vulnerable or disadvantaged groups in the municipality. In the project no migrant or irregular workers will be included in the Pagegiai wind farm project.

Freedom of Expression: The constitutional definition of freedom of expression does not permit slander; disinformation; or incitement to violence, discrimination, or national, racial, religious, or social hatred. Inciting hatred against a group of persons is punishable by imprisonment for up to two years. Inciting violence against a group of persons is punishable by imprisonment for up to three years.

In response to the Russian invasion of Ukraine, on February 24 the president proposed a state of emergency, under section 144, which the parliament approved. It has adopted two more declarations of a state of emergency since then, modifying the scope of its effect. The state of emergency limits some rights to freedom of expression and assembly. The current state of emergency applies only in border areas and was scheduled to remain in effect until March 17, 2023.

<sup>4</sup> <https://osp.stat.gov.lt/eksperimentine-statistika/skurdo-rodikliai>

<sup>5</sup> <https://www.stt.lt/en/news/7481/2023/map-of-corruption-in-lithuania-2022-2023-public-anti-corruption-stance-is-strengthening-though-the-willingness-to-report-cases-of-corruption-remains-a-challenge:3609>

<sup>6</sup> <https://www.transparency.org/en/countries/lithuania>

The government banned rallies or marches in favor of Russia's war in Ukraine during the state of emergency. The series of states of emergency have included restrictions on freedom of expression for anyone who might support Russia's actions. On April 19, the government made legal changes under the state of emergency banning the public display of symbols viewed as having Russian prowar messages, such as the letters "V" and "Z."

In November 2021, parliament declared a state of emergency under section 144 of the constitution, applicable to regions on the border with Belarus and in areas where irregular migrants were being housed. The declaration was the first of its kind since the restoration of the country's independence. Under section 145 of the constitution, the declaration allows the suspension of certain constitutional rights, including freedom of expression.

It is a crime to deny or "grossly to trivialize" Soviet or Nazi German crimes against the country or its citizens, or to deny genocide, crimes against humanity, or war crimes.

Discrimination and Societal Abuses. According to a 2020 survey by the Women's Information Center, only 15 percent of those surveyed who had experienced domestic violence had contacted police. In 2021, the Department of Statistics carried out a survey, which found that 25.2 percent of women and 20 percent of men have experienced physical violence, including threats, or sexual violence.

The government operated a 24/7 national hotline and 29 crisis centers for survivors of domestic violence. On April 11, the government adopted its Action Plan for Domestic Violence Prevention and Assistance to Victims for 2022.

Sexual Harassment. The law prohibits sexual harassment. The law defines sexual harassment as offensive verbal or physical conduct of a sexual nature, towards a person with whom they work, conduct business, or have other relations. Harassment is defined in the same law as unwanted conduct related to the sex of a person that occurs with the purpose or effect of violating the dignity of a person, and creating an intimidating, hostile, humiliating or offensive environment. Pretrial investigations of sexual harassment were relatively rare. According to the equal opportunities ombudsperson, harassment is underreported due to intimidation, fear of job loss, or lack of knowledge about one's rights regarding sexual harassment.

Discrimination: The law provides for the same legal status and rights for women as for men, including family, religious, personal status, and nationality laws, as well as laws related to labor, property, inheritance, employment, access to credit, and owning or managing businesses or property. The government enforced the law effectively. Women continued to experience unequal access to pension benefits and the gender wage gap remained significant, leaving women more exposed to poverty risk.

Discrimination. The law prohibits discrimination against ethnic or national minorities, but intolerance and societal discrimination persisted. According to the 2021 census, approximately 15.4 percent of the population were members of minority ethnic groups, including Russians, Poles, Belarusians, Ukrainians, Tatars, Karaites, and Jews.

On January 18, parliament legalized the original spelling of names and surnames with Latin characters in personal documents. The law, which came into force on May 1, states that citizens can use non-Lithuanian Latin characters – Q, W, and X – in their names in identification documents. A further step to legalize use of Polish diacritic marks was not passed. This is a change long demanded by the country's Polish community, the country's largest ethnic minority.

In August the country reorganized schools nationwide, one result of which was the closure of several small Polish-language schools around Trakai. Polish-language schooling remains available in the municipality.

Roma, whose population in the 2021 census was 2,251 persons (0.07 percent of the country's total population), continued to experience discrimination. After a Roma settlement in Kirtimai was demolished in 2020, housing remained the main challenge for Roma, who often experienced discrimination by landlords who did not want to rent to them. In a 2021 poll conducted by the NGO Diversity Development Group and the media monitoring and journalism innovation program Media4change, Roma remained the most unfavorably viewed ethnic group in the country, as 61 percent of respondents indicated that they would not want to live in a neighborhood with Roma or rent them an apartment<sup>7</sup>.

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<sup>7</sup> 2022 Country Reports on Human Rights Practices: Lithuania. <https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/lithuania>

According to the 2021 census, of the 90 percent of the population that responded to a question regarding religious affiliation, 74 percent identify as Roman Catholic, and 6 percent do not identify with any religious group. Religious groups that together constitute less than 5 percent of the population based on the census include Russian Orthodox, Old Believers, Lutherans, Evangelical Reformed, Jews, Muslims, Greek Catholics, Karaites, Jehovah's Witnesses, members of the Full Gospel Word of Faith Movement, Pentecostals/Charismatics, Old Baltic faith communities, Baptists, Seventh-day Adventists, Methodists, and members of the New Apostolic Church and The Church of Jesus Christ of Latter-day Saints. The number of Orthodox Christians has increased in recent years, due in part to an influx of refugees fleeing Ukraine after the Russian invasion.

According to the 2021 census, 3,917 persons identified as followers of Romuva, a neopagan religion practiced in the Baltic region since before the introduction of Christianity. According to the census, the Jewish population is predominately concentrated in larger cities and numbers 2,256 individuals. Of those, 196 are Karaite, who traditionally live in Trakai and in the greater Vilnius region. The Sunni Muslim population numbers 2,165, the majority of whom are Tatars, a community living primarily in Vilnius and Kaunas. The Muslim community also includes recent converts, migrants, refugees, and temporary workers from the Middle East and Africa, most of whom are Sunni<sup>8</sup>.

## Human Rights Scoping

The human rights initial scoping included a full scoping of applicable human rights. Impacts of those rights being scoped as applicable have then been assessed in detail (Table: Assessment of human rights impacts). The Guidance Note on assessing Human Rights impacts under the Equator Principles was used as the methodology for scoping human rights impacts.

Identified human rights risks and impacts that could possibly arise from the Pagegiai wind farm project starting from pre-construction phase until operational phase of the project. No stakeholder engagement was conducted for this study and the analysis was conducted based on the secondary data provided by LT Energija and data collected from previous stakeholder engagement conducted in 2021-2022 (during the EIA procedures).

This initial scoping is structured to reflect the scale, scope, irremediability and likelihood for each human rights issue.

- Scale: how serious are the impacts for the right holders. The scale element includes consideration of vulnerability of rights-holders because a person or group's circumstances including their capacity to absorb or respond to change may influence how serious the impact may be for them.
- Scope: how many people could be affected by the impact.
- Remediability: will a remedy restore the right-holders to the same or equivalent position before the harm.
- Likelihood: what is the likelihood of the impact occurring.

### Degrees of Likelihood:

- Certain
- Highly Likely
- Likely
- Unlikely
- Uncertain

### Degrees of Scale:

- Severe
- Major
- Moderate
- Minor
- Insignificant

### Degrees of Scope:

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<sup>8</sup> 2022 Report on International Religious Freedom: Lithuania. <https://www.state.gov/reports/2022-report-on-international-religious-freedom/lithuania/>

- Large population
- Large community
- Medium community
- Group of people
- Few people

Degrees of Irremediability:

- Remediable
- Irremediable

Degrees of Risk Severity:

- Very high
- High
- Medium
- Low
- Very low

Predicted impacts assessment include the following types of impacts:

- Impacts that are experienced by local community members as a result of the Pagégiai wind farm project.
- Impacts that may be experienced by the Pagegiai wind farm project`s workforce (both developer and contractors` workers).
- Impact associated with the employment and/or contracting of security forces.

Assessment of human rights impacts of Pagegiai wind farm project

Potential human rights risks	Affected right-holders	Likelihood	Scale	Scope	Irremediability	Risk analysis and mitigation measures to be applied	Overall residual severity
<p><b>Child Labour and Forced Labour</b> The project could affect child labour and forced labour related rights by failing to guarantee that these rights in line with national regulation and international requirements.</p>	<p>Own workforce  Workers of contractors and subcontractors.</p>	Unlikely	Severe	Group of people	Remediable	<ul style="list-style-type: none"> <li>• LT Energija Human Resource Policy prohibits employees under 18 to be employed in Pagegiai wind farm project.</li> <li>• LT Energija Supplier Code of Conduct states that LT Energija suppliers shall not, under any condition, employ children who are below the minimum legal age for employment in Pagegiai wind farm project.</li> <li>• Lithuanian Labour Code prohibits employees under 18 from participating in activities related to the possible dangers of falling constructions, electrocution.</li> <li>• If there is any doubt about the age of the workers on the construction site, the EHS coordinator could perform an additional check during the site inspection</li> </ul>	Low
<p><b>Right to freedom of association and the right to form trade unions and join a trade union and the right to strike</b>  This right could be impacted if the projects contractors or sub-contractors prevented workers from organizing,</p>	<p>Own workforce  Workers of contractors and subcontractors</p>	Unlikely	Moderate	Group of people	Remediable	<ul style="list-style-type: none"> <li>• LT Energija Human Resource Policy obliges LT Energija itself and project contractors to respect the rights of employees to freedom of association and collective bargaining.</li> <li>• LT Energija Supplier Code of Conduct states LT Energija suppliers shall recognize and</li> </ul>	Low



<p>joining unions or participating in collective bargaining.</p>						<p>respect employees' freedom of association and their right to freely choose their representatives. The suppliers shall also recognize employees' right to collective bargaining.</p> <ul style="list-style-type: none"> <li>The EHS coordinator shall perform individual surveys / interviews with workers of contractors and subcontractors related to the collective bargaining and freedom of association during the site inspection</li> </ul>	
<p><b>Right to an effective remedy</b> This right could be impacted by the project if it fails to provide adequate grievance mechanism for own workforce, contractors, and sub-contractors as well as local community members.</p>	<p>Own workforce Workers of contractors and subcontractors Local communities</p>	<p>Unlikely</p>	<p>Moderate</p>	<p>Group of people</p>	<p>Remediable</p>	<ul style="list-style-type: none"> <li>LT Energija has established Grievance Mechanism for own workers, contractors, and subcontractor workers, as well as community members to raise grievances anonymously and not-anonymously via phone, email or online form.</li> <li>Grievances may also be raised during face-to-face meetings with the EHS coordinator and for community members – via the phone or face-to-face with a community liaison specialist.</li> <li>The information about Grievance Mechanism will be distributed to contractor and subcontractor workers during the site visits, and to all local community leaders.</li> </ul>	<p>Low</p>

<p><b>Right to life</b> The project could present a threat to life due to hazards arising from construction operations, both for project workers and for any members of the community living in the project area.</p>	<p>Own workforce Workers of contractors and subcontractors Local communities</p>	Likely	Severe	Group of people	Non-Remediable	<ul style="list-style-type: none"> <li>• LT Energija Health and Safety Policy obliges ensuring that all employees, contractors, and subcontractors will adhere to the identified control measures and use provided personal protective equipment (PPE) appropriately, as well as appropriate work safety training.</li> <li>• The Health and Safety Management Plan and Emergency Preparedness and Response Plan must provide all applicable measures for protecting project workers, including all applicable medical procedures.</li> <li>• A Community Safety Plan to include the measures and approaches that must be applied to protect community receptors from physical safety risk arising from construction, of the ice-throw during operations.</li> </ul>	Low
<p><b>Right to enjoy just and favorable conditions of work</b> This right would be impacted if project workers, contractors or sub-contractors were not given fair working conditions, including fair wages, safe and healthy working conditions including acceptable worker accommodation [when</p>	<p>Own workforce Workers of contractors and subcontractors</p>	Unlikely	Moderate	Group of people	Remediable	<ul style="list-style-type: none"> <li>• LT Energija Human Resources policy obliges project contractors and sub-contractors of having a written employment contract with all employees, complying with the Lithuanian Labour Code requirements and other labour regulations laws. Contractors and sub-</li> </ul>	Low

<p>provided], equal opportunity and reasonable rest time.</p>						<p>contractors must ensure, that that the maximum working duration is 40 hours a week, and the average working time, including overtime but excluding work done according to an agreement on additional work, may not exceed 48 hours over seven days. Also, that daily working duration cannot exceed 12 hours in any case (excluding lunch breaks, per workday/shift and 60 hours over each period of seven days) and that no more than six days can be worked over seven consecutive days.</p> <ul style="list-style-type: none"><li>• The EHS coordinator of LT Energija and Construction Project Management contractor shall perform individual surveys / interviews with workers of contractors and subcontractors related to the working condition, wages and related issues during the site inspection.</li><li>• LT Energija has established Grievance Mechanism for own workers, contractors, and subcontractor workers to raise grievances related to work conditions.</li></ul>	
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<p><b>Rights to non-discrimination and equal opportunity</b></p> <p>This right would be impacted by the project if there were any discriminatory practices or treatment of project workers, contractor or sub-contractor workers or people affected by the project.</p> <p>This right would be impacted by the project if project workers who are from ethnic or linguistic groups are discriminated against, or if appropriate measures are not applied.</p>	<p>Own workforce</p> <p>Workers of contractors and subcontractors</p>	<p>Unlikely</p>	<p>Moderate</p>	<p>Group of people</p>	<p>Remediable</p>	<ul style="list-style-type: none"> <li>• LT Energija Human Rights policy states that the company does not tolerate discrimination, sexual and other forms of harassment.</li> <li>• Lithuanian Labour Code prohibits any form of discrimination, harassment, or sexual harassment in the workplace.</li> <li>• LT Energija Supplier Code of Conduct included clear prohibition of discrimination against other workers or stakeholders on any grounds, including gender, religion, opinion, nationality, ethnicity, disability, language, etc.</li> <li>• LT Energija has established Grievance Mechanism for own workers, contractors, and subcontractor workers to raise grievances related to discrimination.</li> </ul>	<p>Low</p>
<p><b>Right to freedom of thought, conscience, and religion and of opinion and expression</b></p> <p>This right could be impacted in the context of discrimination against project workers, contractor, or sub-contractors' workers on religious grounds or based on their opinions, or the right to express opinions could be unduly restricted for</p>	<p>Own workforce</p> <p>Workers of contractors and subcontractors</p> <p>Local communities</p>	<p>Unlikely</p>	<p>Moderate</p>	<p>Group of people</p>	<p>Remediable</p>	<ul style="list-style-type: none"> <li>• LT Energija Human Rights policy prohibits discrimination against any employee or applicant for employment because of the individual's race, color, religion, gender, national origin, age, disability, sexual orientation, or any other characteristic protected by Lithuanian law.</li> <li>• LT Energija Supplier Code of Conduct obliges suppliers to treat their employees with</li> </ul>	<p>Low</p>

						<p>respect and dignity. All kinds of discrimination based on partiality or prejudice are prohibited such as discrimination based on race, ethnicity, gender, marital status, pregnancy, parental status, religion, etc.</p> <ul style="list-style-type: none"> <li>• LT Energija has established Grievance Mechanism for own workers, contractors, and subcontractor workers to raise grievances related to the right to freedom of thought and expression.</li> <li>• LT Energija Stakeholder Engagement Plan includes a clear policy that the company will encourage all feedback from stakeholders and will not seek to prevent opposing opinions being expressed.</li> </ul>	
<p><b>Right to an adequate standard of living</b> The project could have impact of shadows from wind farm turbine on crop growth which would affect income of the local farmers. During the construction phase there is a possibility of accidental damage to crop fields which can also affect the income of local farmers.</p>	<p>Local communities Landowners</p>	<p>Unlikely</p>	<p>Moderate</p>	<p>Group of people</p>	<p>Remediable</p>	<ul style="list-style-type: none"> <li>• LT Energija has signed agreements with local farmers and landowners, which includes compensation for using the farmland.</li> <li>• LT Energija is obliged to pay compensation to landowners for any future accidental damage as part of the signed agreements.</li> <li>• LT Energija aims to construct a tourism feature (observation tower) to encourage tourists to the local area.</li> </ul>	<p>Low</p>

<p><b>Right to privacy</b> Information that is held by the project about project workers, contractor or sub-contractor workers and those that are involved in stakeholder engagement needs to be properly managed so as to prevent an impact on the right to privacy of those people.</p>	<p>Own workforce Workers of contractors and subcontractors Local communities</p>	Unlikely	Moderate	Group of people	Remediable	<ul style="list-style-type: none"> <li>• Management of personal data for project Workers as well as other parties is carried out inline with the national regulations and GDPR.</li> <li>• The Grievance Mechanism established by LT Energija allows for workers and community members to submit grievances anonymously, and information held about those raising grievances is managed in line with the national regulations and GDPR.</li> </ul>	Low
<p><b>Right to liberty and security</b> The project can threaten the safety of the local communities and disturb the peace of daily life of the locals.</p>	<p>Workers of contractors and subcontractors Local communities</p>	Unlikely	Major	Group of people	Remediable	<ul style="list-style-type: none"> <li>• Threats of violence, corporal punishment, physical or verbal abuse or other unlawful harassment are strictly prohibited by the LT Energija Code of Conduct.</li> <li>• LT Energija has established Grievance Mechanism for its own workers, contractors, and subcontractor workers, as well as members of the local community to raise grievances related to the disturbances and security issues.</li> </ul>	Low

## **Conclusion: Impact Mitigation and Management**

As presented in the table above, there are some potential risks of human rights may occur due to the Pagegiai wind farm project activities, which are mainly related to labor rights, working conditions, discrimination at workplace and rights of local community members to security and adequate standard of living.

If these human rights are improperly managed, it may raise grievances associated with the workers or local community members. Therefore LT Energija has established grievance mechanism for Pagegiai wind farm project workers (own workforce and workers in the supply chain) and local community members as avenue to log the complaint. Currently, LT Energija has developed Stakeholder Engagement Plan and Grievance Mechanism and thus to implement them as a part of actively engage with stakeholder and handling community grievances. Access to remedy will be provided via the established grievance mechanism. Remedial outcomes to grievances will be sought and noting that an appropriate remedy for a given situation is highly context-specific, it requires careful consideration of the facts of the individual grievance, the background and local context, as well as the rights-holders' perspective on what would be appropriate.

The project activities will also affect the economic and social aspects to local communities and farmers within and around the project area. Pagegiai wind farm project is expected would benefits the small business owner (food provider and catering, food delivery; cleaning and accommodation services). LT Energija has agreements with local farmers in place to compensate for the land use and any future damage during the construction and operational phase as well as annual financial support agreements with all local communities. LT Energija is willing to construct a tourism feature (observation tower) to encourage tourists to the local area and to increase social and economic benefits for the local community and the municipality of Pagegiai itself.

These potential impacts on human rights-related issues are predicted could be avoided and are expected to be manageable through proper management planning, active mitigation and monitoring throughout the operation of the project.