


**Environmental and social Action Plan
of the
Margonin Wind Farm project
Poland**

Prepared for:
EDP Renovaveis

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Final

Issue	Action	Environmental risks, Liability/Benefits	Legislative requirement/Best practice	Investment needs/resource	Action completion deadline	Target and evaluation criteria
<i>Annual EHS Report to Lenders</i>						
<p>Provide to the Lenders information on the Environmental, Social, Health and Safety (ESHS) matters as part of an annual ESHS report.</p> <p>Develop a Corporate Annual EHS report and disclose on the internet</p>	<p>Need to disclose information to the Lenders to show compliance with ESAP and current status of EHS issues.</p> <p>The ESHS report to the Lenders should include: a) information on the status of the project, any changes to the project as well as information on environmental performance, mainly compliance with the contractual specifications as well as National and EU environmental standards, b) Information on compliance with the ESAP and provide information on any new projects or changes to planned investments c) information on post-construction monitoring results; d) summary of any material changes in law significantly affecting Environmental or Social Matters, that has a material (above 100 K EURO) impact on the Company and e) a summary of any areas of material non compliance with Environmental Laws – please provide information on any fines or other penalties or pending prosecutions for environmental, health and safety or social matters. f) provide information on material social matters.</p>	Reporting to Lenders	EBRD requirements	Own resources	From 2010	Report to Lenders

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<i>Actions required to achieve compliance with national EHS legal requirements and EU Environmental standards</i>						
Monitoring of impacts to the avifauna after Project and its next phases completion	Conduct monitoring on the wind farm impact on birds and bats in at least 2 year period. Continue such monitoring after completion of the next phases of the project.	Base knowledge on environmental impact of the investment.	Best practice	External resources, use assistance of recognizable ornithological and bats experts	2 years after completion of each phase of the project.	Assess actual impact of the Project on birds and bats, identify room for improvement. Present reports to the Lenders.
Monitoring of environmental impacts after Project completion - noise impact	Conduct noise impact measurements.	Base knowledge on environmental impact of the investment.	Best practice, requirements of the decisions on environmental conditions for investment approvals	External resources. Use service of accredited company.	Within a year after project completion.	To evaluate the actual noise impact of the Project and assure the noise standards at the protective areas are not breached. Present the results to the Lenders.
Cumulative impact of the wind farms.	Take into account a cumulative impact of the Margonin Wschód and Margonin Zachód wind farms as well as other existing and planned developments of the same nature in the area, while conducting an environmental impact assessment of the next phases of the project (the Pawłowo wind farms)	Full understanding on environmental and social impacts of the entire project	Best practice, requirements of the environmental law	External resources. Use service of reputable environmental consultants.	During development of the Pawłowo wind farms project.	To evaluate cumulative impact of the project as a whole.

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<i>Actions to improve EHS issues and stakeholder engagement management</i>						
Environmental and health and safety management systems	Implement formalized management system to address the environmental and H&S issues related to the Project. Take into account requirements of the Lenders. Integrate the management systems with the rest of the EDP group.	Improvement of the project management.	Best practice	Own resources/external support	By the end of 2010	To formalize EHS practice in the Polish office of the company. Report to the Lenders.
Monitoring of the project	Establish formalized procedures of Project monitoring and review, in accordance with PR1. Assign people responsible for Project monitoring and reporting to the Lenders, following the requirements of PR1.	Further improvement of Project development control.	Best practice.	Own resources.	As soon as possible, no later than by the end of first quarter 2010	Fill compliance with PR1. Report to the Lenders.
SEP development. This includes a grievance procedure and a project summary (Non Technical Summary).	Develop SEP that will include annual social and environmental reporting during the operational phase of the Project and development of the further phases of the Project (Pawłowo wind farms)	Improvement of the company communication with community.	Best practice	Own resources	During the project lifetime.	Present the annual report on environmental and social issues on the web page. Publish SEP and NTS on web site Present reports to the Lenders.
Performance audit	Conduct a regular audit (every 3 years) of the wind farm and the further phases of the Project (Pawłowo wind farms)	Improvement of the environmental management.	Best practice	Own resources/external consultants	Every 3 years – first audit 2012.	To reduce environmental and social risk. Present reports to the Lenders