



Stakeholders Engagement Plan
Margonin and Pawłowo
Wind Farms
Poland

Prepared for:
EDPR
Warsaw, Poland

On behalf of:
European Bank for Reconstruction and Development

Prepared by:
ENVIRON Poland Sp. z o.o.
Warsaw, Poland

Date:
February-May2013

Project Number:
PL0930

Project No:	PL0930
Report status and issue:	Final
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Date:	February-May 2013

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1 Introduction

This Stakeholder Engagement Plan (SEP) describes the communication and consultation associated with operations of the existing Margonin wind farm and development of the Pawłowo wind farm which comprises:

- Margonin wind farm of a total installed capacity of 120 MW, which is since 2010 operational;
- Pawłowo part I - Gołańcz wind farm of a total planned capacity of 79.5 MW which is currently under construction;
- Pawłowo part II Budzyń wind farm which is developed for a total capacity of up to 82 MW, however, due to limited technical conditions in power supply to the distribution network will be developed for lower installed capacity, with a possibility to further extension if the connection to the network allows to.

The “wind farm” term used herein include wind turbine generators (WTGs) and auxiliary infrastructure of access roads, assembly/service yards and underground power transmission and steering cables. All three developments have/will have their own electrical substations.

The Margonin wind farm is already connected to the power grid operated by PSE S.A. via a substation located nearby the village of Sypniewo and 110 kV overhead power transmission line (OPTL). The Pawłowo-Gołańcz wind farm will be connected by the 30/110 kV “Pawłowo” substation with the Sypniewo one. For certain period of time, due to limitations of the existing infrastructure, total capacity of both developments will need to be reduced to 150 MW during summer time and 183 MW during the winter time respectively. Ultimately, a new PTL will be developed to the power grid thus both Pawłowo projects will use their own connection of a 120 MW capacity. This, however, will demand the installed capacity of the Pawłowo-Budzyń farm to 40.5 MW. Further expansion of this wind farm will be possible after new technical conditions of connection to the grid are negotiated and agreed with the grid operator.

This SEP describes who may be affected by the project and how communication is planned during the next phases of project implementation and operation, including how grievances will be handled.

2 Requirements

According to the Polish legal framework, the disclosure of information and public consultation is a part of the investment process if the project can significantly influence the environment, as a part of the Environmental Impact Assessment (EIA). Moreover, the information on issued decisions, penalties and other environmental impacts is generally available on request from the environmental authorities. Public participation is also a part of administrative procedures related to establishment of local, regional and national plans and programs, however, this does not apply directly to the subject Project.

As a company of a limited liability, EDP is not obliged by the law to publish annual reports on company's environmental, health and safety, and social performance. However, following the best management practice and requirements of the banks that provide co-financing of the Project, the company reports on these activities and implementation of this SEP.

3 Summary of Previous Stakeholder Engagement Activities

The external stakeholders engagement activities conducted so far by the company have been focused on the following fields:

- communication with administration, environmental and sanitary authorities and other institutional stakeholders as well as with the local communities and NGOs, as part of the project developments, in particular at the stage of environmental impact assessments of the wind farm projects, and
- propagation of facts about renewable energy in general and wind energy in particular;
- distribution of basic information about project development milestones among the citizens of communes at which the company operates or develops the wind farms.

Following the Polish EIA act, the responsibility for information disclosure and public participation in the process of project environmental impact assessment bear the authorities in charge. However, the company, apart from standard communication with respective authorities (commune offices, environmental authorities, different institutions that consult the reports), consultants involved in on-site nature inventories and monitoring, environmental consultants preparing EIA report etc., also actively participate in public consultation process during EIA assessments. Among others, the company participated in a public hearing on October 26, 2010 which was part of the consultation within the Pawłowo-Gołańcz wind farm EIA procedure. For the next two days the company arranged public consultations points in four villages in an influence range of the wind farm. Similar public hearing for the 6 MW part of the Gołańcz-Pawłowo wind farm was organized in December 2010. In both cases, information about the public hearings and distribution points was widely spread by means of:

- announcements on the Communes websites and in local press, managed by the authorities;
- announcements in the periodical bulletins, in a two week advance before the events;
- announcements in the local newspapers in a one week advance before the events.

The company maintains a corporate website on which, at <http://www.edpr.com/sustainability/documents-library-and-publications/?search=margonin>

subpage a project disclosure package is available for review. The project disclosure package comprise among others:

- basic administrative decisions;
- non-technical summaries of developed projects in English and Polish;
- EIA reports in Polish;
- SEP in English and Polish;
- ESAP in English and Polish;
- Public grievance form;
- The results of noise monitoring at the Margoninwind farm;
- The EDPR company results for the first 9 months of 2010.

As part of its communication strategy, the company arranged a Project Information Points (PIP) at the commune offices in Gołańcz and Margonin. The PIPs are the contact points for citizens who instead of direct communication with the company prefer visit to the administration. In the PIPs project disclosure packages and public grievance forms are available.

The company publishes a periodical newspaper “Wind Power” which is distributed to all households of the Margonin and Gołańcz communes to present information about the project development. In order to keep the citizens informed, the company also gives articles or publishes supplements to local newspapers (TygodnikNowy, Chodzieżanin, TygodnikWągrowiecki, GłosWągrowiecki).

As part of the action aimed at promotion of renewable energy the company actively arranged events at schools and other cultural events in the area of its operation.

4 Stakeholder Identification and Analysis

The following stakeholders of the Project were identified:

Societies and individuals:

- citizens of Margonin Community
- citizens of Gołańcz Community
- citizens of Budzyń Community

Neighboring communities:

The Margonin Wind Farm is located in the commune of Margonin (area of 122 km², population of approximately 6,300 inhabitants), county of Chodzież, Wielkopolskie Province

Margonin commune borders with the following communes:

- Budzyń – to the southwest;
- Chodzież – to the west;
- Szamocin – to the north
- Gołańcz – to the east
- Wągrowiec – to the east

The Pawłowo –Gołańcz wind farm is located in the commune of Gołańcz (area 192 km², population approx. 8400), Wągrowiec county, Wielkopolskie province. The commune borders with:

- Damasławek – to the southeast;
- Kcynia – to the northeast;
- Margonin – to the west;
- Szamocin – to the northwest;
- Wapno – to the east;
- Wągrowiec – to the southwest;
- Wyrzysk – to the north.

The Pawłowo-Budzyń wind farm will be located in the commune of Budzyń (area 207.61 km², population approx. 8200), Chodzież county, Wielkopolskie Province. The commune borders with the following communes:

- Chodzież - to the north,;
- Margonin - to the northeast;
- Czarnków- to the west,
- Rogoźno- to the southeast,
- Ryczywół- to the south,
- Wągrowiec - to the east

and residents along transportation roads.

Non-Governmental Organizations

There are over 90 officially registered associations in the county of Chodzież. It is considered that the following may be potentially interested in the Project development and protection of the environment:

- Towarzystwo Miłośników Ziemi Chodzieskiej – Chodzież
- Towarzystwo Ochrony Ptaków, Grupa Nadnotecka
- Stowarzyszenie „Dolina Noteci” in Margonin
- Ogólnopolski Ruch Obrony Praw Obywatelskich i Walki z Korupcją, Margonin

- Polskie Towarzystwo Turystyczno-Krajoznawcze, Chodzież

and also due to already expressed interest:

- Stowarzyszenie "BUTEO", Poznań

Academic institutions:

All universities interested in wind farm impacts on nature and renewable energy.

Commercial organizations

- Polskie Sieci Elektroenergetyczne SA

Workers Stakeholders

- Employees of EDP Renewables in Poland
- Subcontractors.

Administrative stakeholders

Administrative stakeholder	Administrative level	Responsibilities
Burmistrz Miasta i Gminy Golańcz (Mayor of Golańcz Town and Commune)	Local	in charge of the investment process
Wójt Gminy Budzyń (Mayor of Budzyń Commune)	Local	in charge of the investment process (for the future project development)
Regionalny Dyrektor Ochrony Środowiska w Poznaniu (Regional Environment Protection Directorate in Poznań)	Province	in charge of EIA procedure opinion and acceptance
Marszałek Województwa Wielkopolskiego (Marshal of the Wielkopolskie Province)	Province	in charge of acceptance of reports on use of environment
Wojewódzki Inspektor Ochrony Środowiska (Provincial Inspectorate of Environmental Protection)	State	in charge of control of environmental performance of the company
Państwowa Inspekcja Pracy (State Labour Inspectorate)	State	in charge of H&S and labour conditions control
Powiatowy Inspektorat Sanitarny (County Sanitary Inspectorate)	County	in charge of sanitary conditions at the site and opinion in the EIA procedure
Państwowa Straż Pożarna (State Fire Department)	State	in charge of the fire protection
Powiatowy Inspektorat Nadzoru Budowlanego (County Construction Inspectorate)	County	In charge of project completion acceptance and issuing of operational decision
Starosta Powiatowy w Wągrowcu (County Head in Wągrowiec)	County	in charge of building permit issuance
Starosta Powiatowy w Chodzieży (County Head in Chodzież)	County	in charge of building permit issuance
Ministerstwo Środowiska (Ministry of Environment)	Country	in charge of creating environmental law and policy
Ministerstwo Gospodarki (Ministry of Economy)	Country	in charge of creating energy law and policy
Urząd Regulacji Energetyki (Energy Regulatory Office)	Country	grants concessions, approves of energy tariffs, counterworks market monopoly
Others (e.g. Police, Road Transport Inspectorate)	State	respectively

Lenders: the banks co-financing the development.

If any stakeholders have not been identified in the above lists and wish to be contacted with regard to the project, please notify:

Ms. Barbara Sidoruk or Ms. Paulina Szuliga-Piętka
Environmental Specialist
ENVIRONMENT
Postępu 17b Street
Adgar Plaza Building
02-676, Warsaw, Poland
Phone:(48) 331 01 88 Ext. 40114 or Ext. 40125
e-mail: Barbara.Sidoruk@edpr.com or Paulina.Szuliga-Pietka@edpr.com

The environmental documentation prepared for the needs of the project development confirmed that none of the stakeholders will be disproportionately affected by the project implementation. The implementation of the Project will result in improvement of the socio-economic conditions of the communities and individual citizens and will allow generation of the electrical energy without emissions to air and water and with reasonable and insignificant generation of wastes. Nevertheless, the clear and understandable communication with the stakeholders is recommended to be conducted as part of the communication procedures in relation both to Margonin wind farms and Pawłowo wind farms.

5 Disclosure of Information

Disclosure of information will depend on the stage of development of a particular sub-project.

At the operational stage of the sub-projects (currently only Margonin wind farm) the company will maintain routine provision of information about wind farm performance to local citizens. Communication with administrative stakeholders will be focused on provision of reports required by law (annual waste generation report, reports on use of the environment) and arrangements of necessary environmental permits.

At the stage of a wind farm (and other infrastructure) construction, communication with citizens will be primarily focused at collection and examination of grievances which may be submitted due to nuisance of construction works or increased traffic. Communication with administrative stakeholders will include provision of reports required by law (e.g. notification on completion of works) and responses to stakeholders' queries.

In case of the Pawłowo-Budzyń project, the company will arrange in cooperation with the local authorities a public meeting and consultation points at the villages, to provide the local inhabitants and NGOs with requested information and clarify all potential concerns. Communication with administrative stakeholders will include submission of necessary documents, clarifications and participation in formal meetings.

The company, at all stages of wind farm development, will continue the current practice of keeping the local society informed about the project. Information will be distributed by the periodical newspaper "Wind Power" delivered to the households free of charge. Moreover, the company will occasionally distribute project related information in a form of inserts or

sponsored articles in the local newspapers (e.g. GłosWągrowiecki, TygodnikWągrowiecki, Chodzieżanin, MargonińskiInformatorSamorządowy).

The company will continue distribution of project related information by hosting it on the company webpage at:

<http://www.edpr.com/sustainability/documents-library-and-publications/>

A summary of environmental and social impacts, mitigation measures taken, Environmental and Social Action Plan, EIA reports, annual reports on the project development, summary of post-construction monitoring results and other project-related documents will be hosted there.

Disclosure of information to the administrative stakeholders will be based on formal notifications, applications and reporting – as required by law. The competent authorities will be invited (as appropriate) for site visits and on-site clarification of the project or operations status.

Internal stakeholders (Workers) will be informed using the existing communication channels and following the rules of internal communication as set by the ISO 14001 management system. The routine communication channels comprise: meetings, e-mails, trainings, flow of information through the management chain.

The disclosure of information to external stakeholders (non-governmental organization, neighboring communities) will take place in response to direct queries, complaints or objections, following the External Communication procedure of the ISO 14001 management system.

The company will provide the lenders with annual report on project development and performance. The report for the previous year will be presented by the end of 2nd quarter of each year.

6 Stakeholder Engagement Program

The consultation with the stakeholders will be conducted by the Environmental Specialist of the EDPR, with co-operation with the Company Manager.

Any Grievances related to construction activities will be managed by the Mediation Officer of the company.

Consultations with the administrative stakeholders will follow the Project assumed time schedule. At this stage it is assumed, that these stakeholders will be informed in advance of the planned project milestones. It is expected, that final commissioning of the Margonin-Gołańcz wind farms will take place in June/July 2013. The development of the Pawłowo-Budzyń wind farm will depend on the EIA procedures, which cannot be ultimately established now. Information on the on-going administrative procedures will be published by the Budzyń commune following the requirements of the environmental regulations.

Communication with the internal stakeholders will follow respective procedure of the ISO 14001 system. At a minimum, communication will involve meetings, emails and an information sharing via an intranet system.

Information on the project milestones will be published in the local newspapers, such as: Głos Wągrowiecki, Tygodnik Wągrowiecki, Chodzieżanin, Margoniński Informator Samorządowy and in periodical, free-of-charge newspaper "Wind Power". Moreover, the disclosure information package which comprises:

- EIA reports;
- environmental decisions;
- summaries of the on-site environmental and nature inventories and monitoring results;
- Administrative decisions related to the Project

will be made available for the public review at the Margonin, Gołańcz and Budzyń authorities offices:

Urząd Miasta i Gminy
Margonin

ul. Kościuszki 13
64-830 Margonin
tel. (+48-67) 28 46 068

Urząd Miasta i Gminy
Gołańcz

ul. dr. Piotra Kowalika 2
62-130 Gołańcz
tel. (+48 67) 261 59 11

Urząd Gminy Budzyń

ul. Lipowa 6
64-840 Budzyń
tel. (+48 67) 284 32 01

Should any issues be raised by the stakeholders, the company management will react accordingly in the shortest possible time.

The responsibility for the SEP implementation will be held by the EDPR Managing Director. He will be supported by the Environmental Specialist and the Mediation Officer of the company.

Below there is the summary of possible consultations activities as the company will undertake as part of the Engagement Plan:

Stakeholders:	Consultation, communication method and objective	Proposed milestones	Responsibility
<i>Societies and individuals</i>			
Residents of communes where projects are developed	Information boards and websites of local administration. Project Information Points. Participation in public hearings. Press information.	At commencement of each phase of the EIA procedure. Before commencement of the construction works. Before operational startup of the wind farm.	Local administration. Company
Workers of the company and contractors of the civil works and wind farm operation.	Intranet Meetings e-mails	During the whole project	Company/Project Manager
<i>Commercial organizations</i>			
Distribution System Operator	Meetings. Email and regular main exchange.	During the whole project	Company management
<i>Administrative Stakeholders</i>			
Ministry of Economy Ministry of Environment	Formal letters, notifications, meetings on as needed basis.	On as needed basis.	Company management, Project Manager and Environmental Specialist.
Energy Regulatory Office /Urząd Regulacji Energetyki/	Consultation meetings – information, exchange of documentation and correspondence regarding the project.	On as needed basis	Company management, Project Manager and Assets Specialist.
RDOS /Regional Directorate of Environmental Protection/	Submission of environmental monitoring results. Meetings, exchange of correspondence.	During exploitation of the wind farm.	Company management and Project Manager and Environmental Specialist
State Labour Inspectorate /Panstwowa Inspekcja Pracy /	Consultation meetings – information, exchange of documentation and correspondence regarding the project.	On as needed basis.	Project Manager and H&S Specialist.

Province Marshal	Submission of reports on environmental emissions.	During the project lifetime, in half-year periods.	Project Manager
Local government administration	Consultation meetings – information, exchange of documentation and correspondence regarding the project.	During the project lifetime.	Project Manager.
Road Administration	Consultation meetings – information, exchange of documentation and correspondence regarding the project.	During construction works – delivery of wind farm elements.	Project Manager
Police	Consultation meetings – information, exchange of documentation and correspondence regarding the project.	During construction works – delivery of wind farm elements.	Project Manager
Non-Governmental Organizations			
NGOs – birdlife associations local and international, local ecological NGOs	Company website, information meetings, and answers to direct questions, complaints or protests..	During the whole project	Project Manager and Environmental Specialist
Lenders			
International Finance Institutions	Reporting on project status and performance. Meetings on as needed basis.	During the project lifetime. Summary reports submitted to lenders on annual basis.	Company management.

7 Grievance Mechanism

The formalized grievance mechanism has already been implemented by the company.

Grievances related to the damages while construction or maintenance of the wind farm

Such grievances can be announced by the local inhabitants in reaction to damages caused by the Company contractors or employees during the construction works or later, at the exploitation stage, during the service works. Such grievances (related to damages caused by the construction works) can be notified to the company either directly or via a relevant Community authorities. The company will follow a standard procedure to deal with these concerns:

- a citizen notifies the company or authorities on real or potential damages;
- the authorities inform the Company of the complaint if relevant;

FINAL

- within 14 working days, the Mediation Officer of the company (a person in charge of supervision of the construction works and operation of wind farm) contacts the complainant and arranges to meet him or her at the place of the notified damage or other convenient location, depending on the issue of concern;
- the complaint will be investigated, and if found to be valid, the scope of damages and a level of compensation would then be negotiated between the complainant and the Mediation Officer;
- if agreement is achieved the compensation is paid to the complainer within 30 days.

If the complaint cannot be resolved by discussion and negotiation, or if the complaint is not found valid by the Company, the complainant is able to pursue the matter in the courts.

The entire procedure is recorded by the Company.

Such grievances should be addressed to:

- 1) Mediation Officer of the Company (contract details are presented further in this section).
- 2) Head of the respective Community Office

Other Grievances

The Environmental Specialist will be in charge of responding to complaints on things other than those related to damages. He/she will acknowledge grievances within 5 working days and respond to most grievances within 14 working days. Should any grievance due to its complexity require a longer time to respond, the reason on a delay and expected date of response as well and steps taken to address the grievance will be notified to the complainer within 14 working days.

All complaints and other comments or requests for information related to the performance of the wind farms should be addressed to:

Ms. Barbara Sidoruk or Ms. Paulina Szuliga-Piętka
Environmental Specialist
ENVIRONMENT
Postępu 17b Street
Adgar Plaza Building
02-676, Warsaw, Poland
Phone: (48) 331 01 88 Ext. 40114
e-mail: Barbara.Sidoruk@edpr.com or Paulina.Szuliga-Pietka@edpr.com

or the Mediation Officer for the Pawłowo-Gołańc during construction:

Mr. Karol Rybicki
CONSTRUCTION & ENGINEERING,
Postępu 17b Street
Adgar Plaza Building
02-676, Warsaw, Poland

Phone:(48) 331 01 88
e-mail: Karol.Rybicki [@edpr.com](mailto:Karol.Rybicki@edpr.com)

during operation of Wind Farm:

Margonin Wind Farm
MrMarekWiśniewski
OPERATION & MAINTANANCE
Wind Farm ManagerMargonin
GPZ Sypniewo 31, 64-830 Margonin
e-mail: Marek.Wisniewski@edpr.com

Pawłowo-Gołańcz Wind Farm
Mr.Sebastian Januchowski
OPERATION & MAINTANANCE
Wind Farm Manager Pawłowo – Gołańcz
GPZ w miejscowości Rybowo
e-mail Sebastian.Januchowski@edpr.com

Contact details for the Mediation Officer responsible for Pawłowo-Budzyń development will be provided later.

SEP (Stakeholder Engagement Plan) , NTS (Non-Technical Summary) and ESAP(Environmental and Social Action Plan) in hard copies are available in Chodzież office of the company (3A WiosnyLudów Str., 64-800 Chodzież), Mr. MarcinDaraż, phone +48 692442642.

The contact people in Administration Communities are the following:

- Urząd Gminy Budzyń, ul. Lipowa 6, 64-840 Budzyń – Mr Łukasz Szczurek, Mr Łukasz Grabarski, phone:67 2843201
- Urząd Miasta I Gminy Margonin, ul. Kościuszki 13, 64-830 Margonin
- Mr Marek Nowaczewski, Mr Karol Szymkowiak, phone: 67 284 60 68
- Urząd Miasta I Gminy Gołańcz, ul. dr. Piotra Kowalika 2, 62 - 130 Gołańcz –Ms Jolanta Szulc, phone: 67 2615911

In the Community Offices the documentation (SEP, ESAP, NTS and EIA reports) are available.

The public grievance form used by the company is presented in the table below. Such form (both in English and Polish) is posted on EDPR webpage and is available at the commune offices.

Table. Public Grievance Form.

Reference No:	
Full Name	
Contact Information	By Post: Please provide mailing address: _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	By Telephone: _____ By E-mail _____
Preferred Language for communication	Polish English
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

8 Monitoring

The SEP will be monitored by a Managing Director.

9 Resources and Responsibilities

This SEP will be implemented by the employees of the company and mainly with allocation of the company resources. Cooperation with the local press will be required to prepare appropriate information on the project. The Authorities will prepare announcements as required by the environmental by their own resources.

Responsibility for the plan implementation will bear the Managing Director.

10 Timetable

The communications with stakeholders during the development of the Pawłowo wind farms will follow actual development of the project which cannot be evaluated at this stage, but will be communicated with local authorities and in the newspapers identified and on the website as soon as they are known.

The annual report on health, safety, environment, and social issues will be issued in the first quarter of each year, reporting on the preceding year. These reports will be posted on the company website.