

Darłowo Wind Farm Phase IIIA & IIIB, Poland

Stakeholder Engagement Plan

April 2014

Pekanino Wind Invest and Gorzyca Wind Invest

Invenergy



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Contents

Chapter	Title	Page
1	Introduction and Project Summary	1
2	Regulatory Requirements	4
	National and European Regulation _____	4
	EBRD Requirements _____	4
	Project compliance _____	4
3	Identification of Stakeholders and Communication methods	5
4	Stakeholder Engagement Plan	7
	Information Disclosure _____	7
	Community Liaison Officer _____	8
	Stakeholder Engagement activities, timescales and responsibilities _____	8
5	Public Grievance Mechanism	11
6	Company Contact Information	13
	Appendices	14
	Appendix A. Grievance Form _____	15

1 Introduction and Project Summary

The Darłowo Wind Farm Phases IIIA and IIIB (the Project) is currently being developed by Pękanino Wind Invest Sp. z o.o. and Gorzyca Wind Invest Sp. z o.o. (collectively referred to as the Project Company), these are single corporate entities belonging to Invenergy Poland Darłowo Holdings S.à r.l (Invenergy) and Enerco sp. z.o.o. sp. k. (Enerco) (collectively referred to as the Sponsor). The Project is part of the approximately 250 Megawatt (MW) Darłowo Energy Centre (DEC).

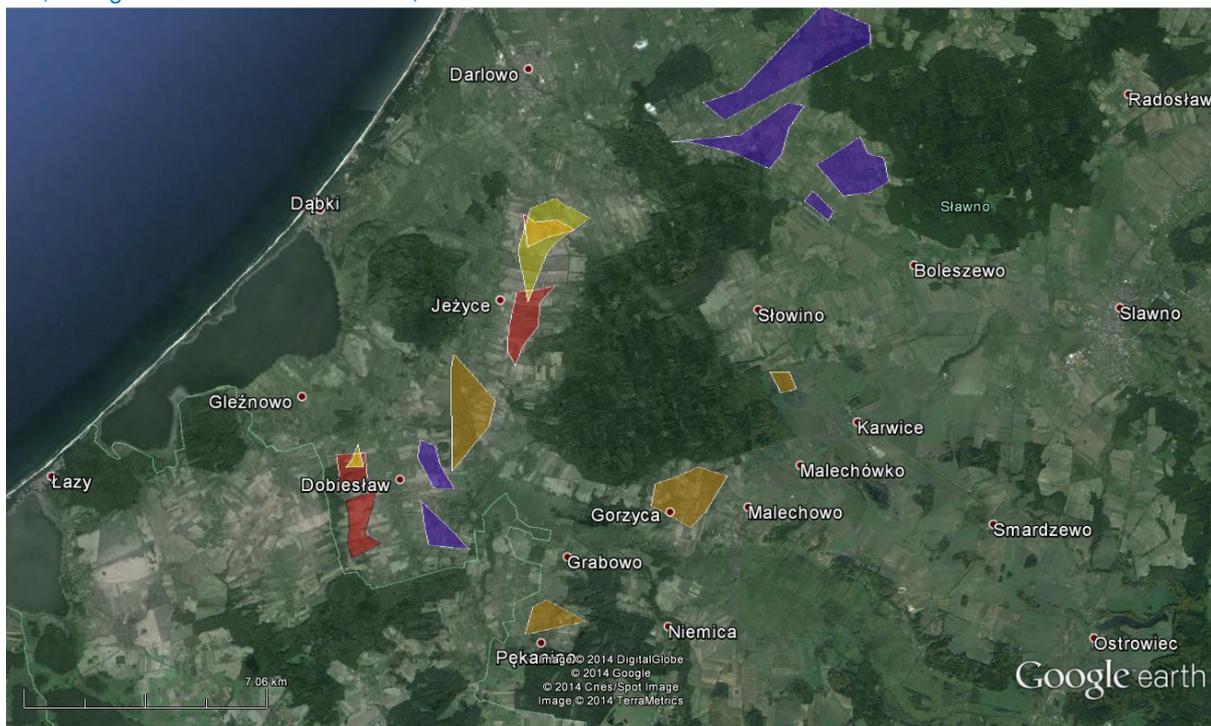
This document is a Stakeholder Engagement Plan (SEP) outlining the steps to be taken by the Project Company to bring consultation and engagement relating to the Project, with local communities, up to national and international standards. The SEP:

- Describes the Project.
- Describes the applicable national and international requirements relating to stakeholder engagement.
- Identifies Project stakeholders and the approach to engaging them in the Project.
- Describes a public grievance mechanism and relevant contact details.

This SEP and its associated documents will all be translated into Polish and disclosed to affected communities and other interested stakeholders.

The Project will be located in the Darłowo and Malechowo municipalities, within the Sławno County in the West Pomeranian Voivodeship. 24 villages and one large town (Darłowo) were identified to be located within 3km of the Project site. This number will be kept under review during future SEP updates. The closest WTG is located approximately 6km from the south coast of the Baltic Sea, in a flat area mainly dedicated to agriculture and grazing activities and consisting of open farm land with adjacent woodland areas and scattered dwellings and farms.

Figure 1.1: Project location: Purple areas enclose Phase I; Red areas enclose Phase II; Yellow areas enclose Phase IIIA; Orange areas enclose Phase IIIB;



Source: Google Earth Pro used under licence

The Project will consist of a total of 36 wind turbines in two parts consisting of:

- Phase IIIA – this phase includes 16 Wind Turbine Generators (WTGs) model GE 1.5 SLE with a hub height of 80m and a rotor diameter of 82.5m;
- Phase IIIB – this phase includes four WTGs model GE 2.5-100, with a hub height of 98.3m and a rotor diameter of 103m, and 16 WTGs model GE 2.5-120 with a hub height of 120m and a rotor diameter of 120m
- An underground electric collection system, which interconnects the WTGs directly to the existing 30 kV/110kV Jeżyczki Substation
- Access roads - whenever possible, the Project will make use of the existing access roads, which will be refurbished to grant access to heavy vehicles.
- Additional 75 MVA transformer built at the existing Jeżyczki substation

An Environmental Impact Assessment (EIA) to Polish national requirements was prepared for various Project components (all within Phase IIIB) in October 2013 and December 2013. Phase IIIA has not been subject to the Polish EIA process as a result of a screening stage decision by Darłowo and Malechowo commune authorities. Key stakeholder meetings and information disclosure were carried out by the Project Company during the EIA process, focusing on Darłowo and Malechowo commune authorities.

Information has been disclosed through notices on bulletin boards at Darłowo and Malechowo commune offices, local village administrative offices as well as on the websites of the two communes (www.ugDarłowo.pl and www.malechowo.pl).

The Project Company has noted that there is considerable coverage of the Project in the local media, with concerns raised regarding the lack of adequate community involvement in spatial planning by the local authorities, particularly in Darłowo commune, which is directly linked to the development of wind farms in the area. While the Project Company is responsible for only Phase IIIA and IIIB of the Darłowo Wind Farm, and did not lead masterplanning consultations, it recognises the importance of addressing community concerns at the earliest opportunity. This SEP outlines the approach that will be followed by the Project Company to achieve this.

2 Regulatory Requirements

National and European Regulation

The key national legislation governing stakeholder engagement around the Project is the Polish Act on the Provision of Information on the Environment and its Protection, Public Participation in Environmental Protection and Environmental Impact Assessments of 3 October 2008 (EA 2008). EA 2008 replaced the earlier Polish Environmental Protection Act of 27 April 2001 (EA 2001).

EA 2008 was passed to align Polish law with the following two pieces of European regulation which have specific consultation requirements that EA 2001 was not aligned with:

- UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (known as the 'Aarhus Convention', 2001, to which Poland became a signatory on 25 June, 1999 and ratified it on 15 February, 2002)
- European Commission (EC) Directive 97/11/EC, which was an amendment to Directive 85/337/EEC.

While EA 2001 would not require public meetings for this type of project, EA 2008 includes greater emphasis on public participation; particularly Article 36 which states: "The administration authority competent to issue the decision may conduct an administrative hearing open to the public".

EBRD Requirements

EBRD is committed to promoting environmentally sound and sustainable development in accordance with its Environmental and Social Policy (May 2008) and the subsequent Performance Requirements (PR). EBRD sets out their stakeholder engagement requirements in the following documents:

- Environmental and Social Policy (2008)
- Public Information Policy (2008)
- PR 10 Information Disclosure and Stakeholder Engagement (2008).

EBRD considers public consultation and stakeholder engagement as an on-going process, to be started at the earliest stage of the environmental and social assessment process, and to be continued throughout the entire life of the EBRD-financed project.

Project compliance

Key stakeholder meetings relating to the EIA process for some Project components were conducted in 2013 aimed at compliance with EA 2008, as a result of which national permits were granted. It should be noted that the administration authorities (Darłowo and Malechowo communes) did not exercise the option to hold public meetings to disclose information about the Project and the environmental and social assessment process and to collect stakeholder comments.

Given the lack of Project specific public consultation, at the present time the Project is considered non-compliant with EBRD's consultation and engagement requirements. This Stakeholder Engagement Plan (SEP) is designed to improve the Project's compliance with both national and EBRD requirements.

3 Identification of Stakeholders and Communication methods

The Project stakeholders identified at this stage are presented in Table 3.1 which also presents an analysis of the best ways to engage with them according to the media that they are likely to use and be most comfortable with.

Table 3.1: Identification of Stakeholders and Communication Methods

Stakeholders	Population	Communication / Contact Details	Proposed Media
Internal Stakeholders			
Project Company Employees Project Companies are special purpose vehicles and do not have any employees except for board members. All services are subcontracted to third entities	0-1 depending on Project phase	Weekly/monthly internal reports and meetings	None
MDI (main construction contractor) Workers	120	Weekly tool box meetings, fortnightly safety meetings, internal bulletin boards	None
Trade Unions: The Project Company is not aware of any members of staff belonging to trade unions, but they are not prohibited from joining, and if identified in the future, they will be incorporated into this SEP.	NA at present	Collective bargaining agreements. Annual meetings or meetings following the request from either party.	None
External Stakeholders			
VILLAGES, WITHIN A RADIUS OF 3KM			
Gmina Darłowo (Darłowo Commune)			
Borszewo	184		
Czarnolas	3		
Darłowiec	14		
Dobiesław	379		
Jezyce	272		
Lesnica	26	Soltys of each village to be contacted via: Franciszek Kupracz, ul. Dabrowskiego 4, 76-150 Darłowo promocja@darlowo.pl +48 943446301	Notice boards within villages and the Darłowo Commune office Głos Koszaliński and Sławno Nasze Miasto (regional newspapers) Radio Koszalin
Nowy Krakow	25		
Peciszewko	116		
Rozkowo	To be determined		
Rusko	221		
Słowino	410		
Wiekowice	460		
Wiekowo	212		
Zagorzyn	73		
Piecniechowo	To be determined		

Darłowo Wind Farm Phase IIIA & IIIB, Poland
Stakeholder Engagement Plan

Stakeholders	Population	Communication / Contact Details	Proposed Media
Gmina Malechowo (Malechowo Commune)			
Dabrowa	To be determined	Soltys of each village to be contacted via: Jan Szlufik, 22a, 76-142 Malechowo	Notice boards within villages and the Malechowo Commune office
Grabowko	To be determined	urzad@malechowo.pl	
Grabowo	120	+48 943184213	Glos Koszaliński and Słwno Nasze Miasto (regional newspapers) Radio Koszalin
Karwice	410		
Kawno	To be determined		
Malechowko	180		Project website
Malechowo	589		
Niemica	360		
Pekanino	340		
LARGE TOWNS WITHIN SLAWLO COUNTY			
Darłowo	14,380	Franciszek Kupracz, ul. Dabrowskiego 4, 76-150 Darłowo promocja@darlowo.pl +48 943446301	Regional newspaper Regional radio station
SENSITIVE LOCAL POPULATIONS			
No specific groups have been identified, but future consultation will aim to identify such groups (eg people with health concerns relating to wind turbine noise or shadow flicker, schools along the construction route)	Not applicable until specific groups are identified	The most suitable means of providing information to each specific group (eg talks in local schools, newsletters) will be determined if and when such groups are identified and this SEP will be updated.	As stated in communications column
NGOs:			
Stowarzyszenie miłośników pradoliny Grabowej	Not applicable	Paproty 8, 76-142 Malechowo; prezes – Iwona Rybicka; vice – prezes Jan Stalko	Meetings with the NGO Public meetings Website

This SEP is considered to be a live document, and will be updated on an ongoing basis as new stakeholders are identified through the Project implementation. The SEP will be updated at least annually.

4 Stakeholder Engagement Plan

Information Disclosure

The Project Company will disclose a range of information to ensure that stakeholders are well informed about the Project and potential environmental and social impacts throughout the lifecycle of the Project. In some cases stakeholders will have the opportunity to comment on specific items disclosed, and the public grievance mechanisms will be available to stakeholders throughout the life of the Project. In all cases, the primary language of disclosure will be Polish. These disclosure activities are presented in Table 4.1 below.

Table 4.1: Public Consultation and Information Disclosure framework

Information to be disclosed	Timeframe	Communication / media tool	Opportunity for stakeholder comment
Internal Stakeholders			
Workers grievance mechanism	From the commencement of Project activities.	Internal newsletter Bulletin board Training sessions Intranet	Workers (including non-employees) can lodge grievances at any time throughout their employment on the Project
Human resources and Environment, Health and Safety (EHS) policies and procedures	From the commencement of Project activities.	As above	Through the relevant grievance mechanism
Employment terms and conditions	From the commencement of Project activities	Included in contracts	Through the relevant grievance mechanism
External Stakeholders			
Company's environmental and social policy	Immediately following development of the policy	Project website ¹	None
Non-technical information about the stakeholder engagement programme and the Environmental and Social Action Plan (ESAP) showing how impacts will be managed	Timeframes to be determined – see section 4.2	Project website Hard copies provided to local government offices to be made available for public viewing at the offices Public meetings	Stakeholders will be able to submit comments for a period of 21 days before finalisation using the contact details in Section 6 of this report.
Livelihoods Restoration Framework (LRF)	Following development of LRF ²	Individual meetings and group discussions with affected parties Public meetings (Details to be included in LRF)	At meetings Through LRF specific grievance mechanism (to be included in LRF)
Project schedules provided to directly affected / vulnerable	Immediately for works already commenced	Project website Signposts at Project	Regular contact is maintained between

¹ As detailed in the Environmental and Social Action Plan (ESAP), Project Company to develop a Project website to be used to disclose Project information and documentation, such as this SEP and its associated documents. Once the website has been created, the Project Company will update this SEP to include the website's link.

² The LRF is also a requirement of the ESAP and no specific timeline has been determined for the publication of the LRF; it is required to be completed as soon as possible.

Information to be disclosed	Timeframe	Communication / media tool	Opportunity for stakeholder comment
stakeholders	Three months prior to start of construction of other components.	locations Meetings with land owners and communes Timetable provided as a letter or handout	Project Company representatives, land owners and communes, who can comment at any time.
Public grievance mechanism	Immediately	Project website and contact details in Section 6 of this report.	Public can lodge grievances at any time throughout the lifecycle of the Project
Annual Report including a summary of environmental and social impacts, health and safety performance, implementation of external grievance mechanism.	Annually.	Project website	None
EIA documentation	Lifetime of Project	Project website Hard copies provided to local government offices to be made available for public viewing at the offices	None
Community Investment / Corporate Social Responsibility (CI / CSR) principles, selection criteria and activities	Lifetime of Project	Project website	Public can lodge grievances at any time throughout the lifecycle of the Project using the Public grievance mechanism

Community Liaison Officer

The Project Company will appoint or sub-contract a Community Liaison Officer (CLO) who will be responsible for community liaison and arranging communications with local communities. The CLO will be constant throughout the Project and will be largely responsible for implementation of the SEP, particularly receiving and channelling comments and concerns during the remaining construction phases as well as management of the grievance mechanism during the construction and operational phases.

Stakeholder Engagement activities, timescales and responsibilities

The envisaged programme of Public Consultation and Disclosure activities is detailed in Table 4.2 below. This programme includes immediate consultation and engagement activities required to address current stakeholder concerns, as well as regular consultation and disclosure activities throughout the Project lifecycle.

Table 4.2: Public Consultation and Disclosure Programme

Activity	Timing/detail	Responsibility
1) Immediate stakeholder engagement		
Informal village level fact finding meetings	May 2014 Informal village level meetings in up to 10	Project Company

Activity	Timing/detail	Responsibility
	villages across Darłowo and Malechowo communes, to give local communities the chance to raise concerns, ask questions and provide comment on the Project. Introduce the LRF and CI/CSR principles. Information on potential, real and perceived health impacts of living near wind farms.	
Notification of formal public meetings	May 2014 Regional newspapers or radio station as identified in table 4.1.	Project Company
Formal public meetings	May 2014 Two formal public meetings, one in each commune, to present a non-technical summary (NTS) of the Environmental and Social Action Plan (ESAP) as well as construction schedules. Attendance of these meetings by residents of all villages identified in Table 3.1 must be facilitated by the Project Company, eg provision of transportation. Introduce the LRF (this discussion will be continued in specific LRF meetings, to be detailed in the LRF) and CI/CSR principles. Information on potential, real and perceived health impacts of living near wind farms.	Event arranged and advertised by Project Company Event attended by CLO, Project Manager and other Project Company staff as deemed appropriate Attendance of Darłowo and Malechowo authorities is highly desirable Project Company to record meeting, attendance and collect feedback forms and report outcomes to Lenders
Key stakeholder interviews	May 2014 Up to five key stakeholder interviews with grass roots community leaders and any appropriate NGO representatives, to discuss real and perceived Project impacts.	Project Company
LRF meetings	To be included in the LRF	Project Company
2) Construction Phase Engagement		
Ongoing community liaison and grievance logging, resolution and reporting	Communications with commune and village leaders. Weekly grievance reporting to Project Manager.	CLO Contractor Project Manager
Regular community consultation events	Commune level events. Prior to the start and end of construction, and other key changes to inform communities on likely impacts and mitigations.	CLO
Regular updates of website, in newspapers and on radio	Updates when activities change, milestones are reached etc. Provision of public domain information as it becomes available, such as information on management of construction impacts, monitoring reports and annual reports.	CLO and Project Company press unit
Updating SEP	Prior to the start and end of construction.	CLO

Activity	Timing/detail	Responsibility
	Upload updated versions to Project website.	
Annual Reporting	Project specific annual report summarising Project performance, CLO activities including grievances and updates to the SEP.	Project Company
3) Operation and Decommissioning Phase Engagement		
Grievance logging, resolution and reporting	Bi-annual grievance reporting to Project Manager.	Operational CLO and Project Manager.
Decommissioning consultation event with affected staff and communities	With staff prior to retrenchment proceedings. With communities prior to ceasing operations.	Operational CLO and Project Manager.
Updating SEP	Annually.	Operational CLO and Project Manager.
Annual Reporting	Information about the Project during its operational phase will be included in the Project Company's annual sustainability reporting.	Project Company

The meetings mentioned above are currently being planned and specific venues and dates will be included in this SEP once they have been finalised. Future meetings will be arranged if and when significant Project impacts are realised or scheme design or construction schedules differ significantly from that already disclosed.

Meetings will be held in a culturally appropriate manner with consideration of literacy levels and the needs and concerns of vulnerable stakeholders. At the meetings stakeholders will be invited to comment on the Project and their opinions and concerns will be fed back into the ESAP.

The meetings will be advertised in the newspapers or on the radio stations noted in Section 3 for a period of seven (7) working days in advance. The meetings will be open to all of the public; however, the attendance of local community members and vulnerable stakeholders will be targeted through the distribution of leaflets and signage in the commune offices of the local villages.

At the meetings an open book will be used to allow comments to be recorded anonymously. This book will be made available in an easily accessible area of the exhibition but in an area that will not be directly monitored by host staff (eg by the exit). The information will be recorded so that a response and feedback can be made available to stakeholders.

5 Public Grievance Mechanism

The Project Company will implement a grievance mechanism to ensure that it is responsive to any concerns, complaints particularly from affected stakeholders and communities. Special care will be focused on training of the Project Company staff involved in the management of the grievance mechanism. This Public Grievance Mechanism is separate from a Workers Grievance Mechanism, another EBRD requirement that the Project Company will need to implement.

Any comments or concerns can be brought to the attention of the company verbally or in writing (by post or e-mail) or by filling in a grievance form a grievance form (example included in Appendix A). The grievance form will be made available on the Project website, once the website is created, alongside this description of the grievance mechanism. Grievance forms can then be submitted to the company contact details provided in section 6.

All grievances will be:

- Acknowledged within **7 working days**
- Responded to no later than within **14 working days**.

Grievance information will be recorded in a grievance log by specifically nominated and trained members of staff. This will include including:

- Stakeholder name and contact details,
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

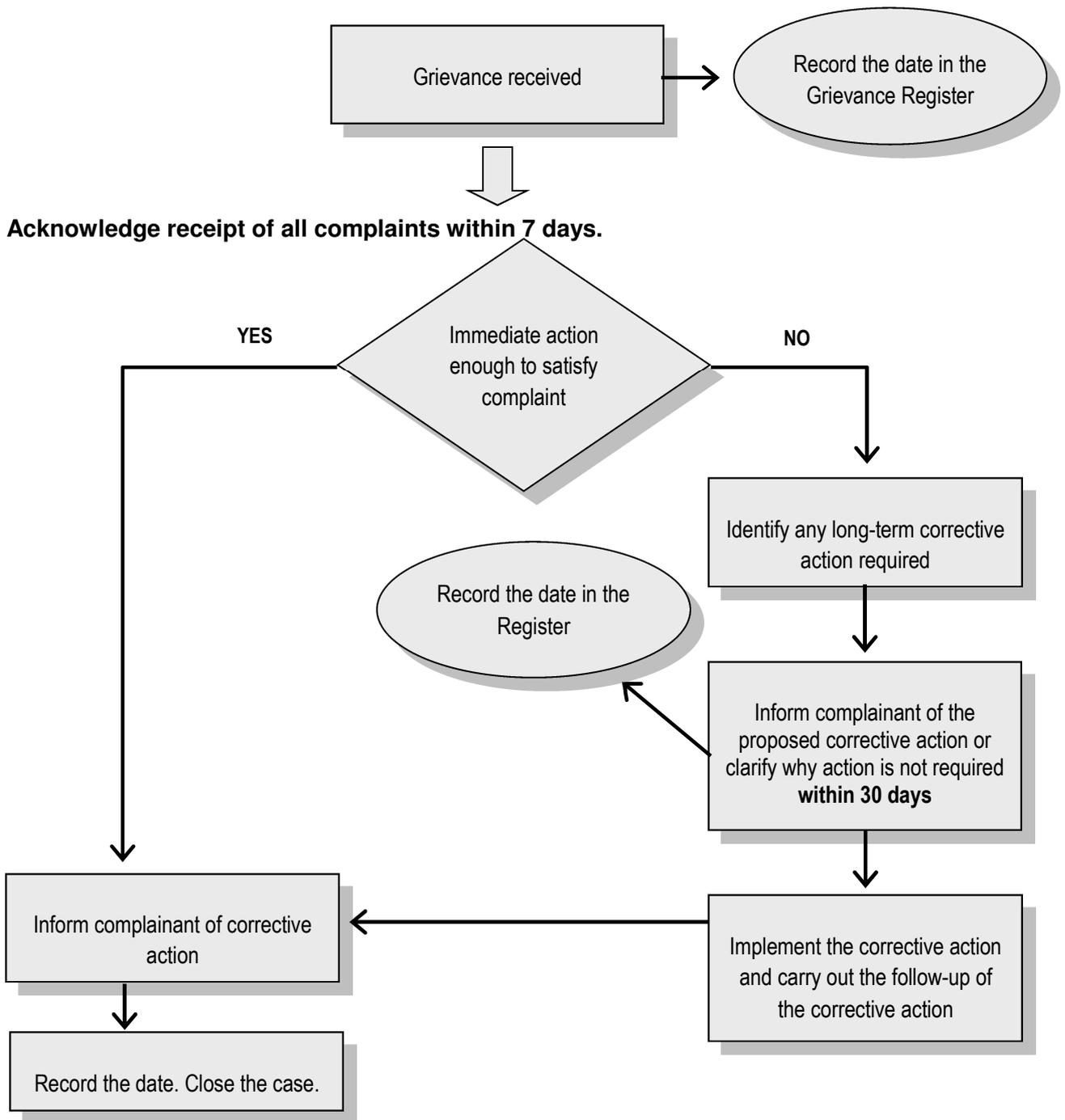
This process is depicted in **Figure 5.1** overleaf.

Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

A suite of Key Performance Indicators (KPIs) will be developed the Project Company to enable the performance of the grievance mechanism to be monitored and amended where necessary.

A separate grievance mechanism is available for Project employees and this is not detailed in this SEP.

Figure 5.1: Flowchart for Processing Grievances



6 Company Contact Information

Different types of grievances and all general comments and queries can be submitted directly to the Project Company's office in Darłowo:

Attention: Izabela Wojciechowska

Company: Pękanino Wind Invest sp. z.o.o. and Gorzyca Wind Invest sp. z.o.o.

Postal Address: Sińczyca 24, 76-150 Darłowo (working hours: 08:00-16:00)

Telephone: (+48) (94) 314-33-22

E-mail address: windservice@windservice.eu

Appendices

Appendix A. Grievance Form

15

Appendix A. Grievance Form³

Reference Number:	
Full Name	<i>Please do not fill details if you choose to raise an anonymous grievance</i>
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail)	By Post: Please provide mailing address: By telephone: By e-mail:
Preferred language of communication if other than Polish?	
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 to resolve this problem?	

Signature.....

Date.....

Please return this form to:

Attention: Izabela Wojciechowska
Company: Pękanino Wind Invest sp. z.o.o. sp. k.
Postal Address: Sińczyca 24, 76-150 Darłowo (working hours: 08:00-16:00)
Telephone: (+48) (94) 314-33-22
E-mail address: windservice@windservice.eu

³ Grievance Form to also be translated into Polish and to be distributed to affected communities and interested stakeholders.