

Stakeholder Engagement Plan and Grievance Mechanism Wind farms ZD2P and ZDP3 Croatia

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1. INTRODUCTION

At the request of Kunovac Ltd. (the Client) OIKON Ltd. has prepared the Stakeholder Engagement Plan (SEP) and Grievance Mechanism for the planned wind farms ZD2P (WF ZD2P) and ZD3P (WF ZD3P) development. The WF ZD2P will be located within the area of the existing WF ZD2 which has been in operation since 2012 while the planned ZD3P will be located within the area of the existing WF ZD3 which has also been in operation since 2012.

The SEP is prepared to meet good international practice for stakeholder engagement and public consultation and disclosure. The SEP aims to provide clear and practical guidance for stakeholder engagement and compliance handling procedures. Here should be noted that although the formalized stakeholder engagement procedure is mostly required by law and/or EU international standards, it should not be judged as "yet another legislative and/or administrative burden".

On the contrary, the development of energy projects, even in renewable energy sources, which are considered instrumental to achieving the EU 2050 climate neutrality goal, can be subject to public scrutiny for various reasons. Therefore, meaningful stakeholder engagement is a vital part of business strategy for sustainable and long-term operations, which is also often called "social license to operate".

Important definitions

Stakeholders are individuals and organizations that are directly or indirectly affected by a project, as well as those who have an interest in a project and/or the ability to influence its outcome positively or negatively. Stakeholders may include 1. locally affected communities or individuals and their formal and informal representatives; 2. national or local government agencies, politicians, religious leaders, civil society organizations, and business associations; 3. national and local media; 4. the academic community; 5. other businesses.

Stakeholder engagement is not synonymous with stakeholder management in the sense of "manage your stakeholders (to get them to do or think what you want)". It requires a sincere commitment by project developers and other stakeholders to use stakeholder engagement as an opportunity to improve every stage of their activities, rather than as a process to confirm decisions and positions already taken, reflected in the "decide-announce-defend" approach (using statutory public participation merely as an administrative formality). One of the most important benefits of meaningful stakeholder involvement is the "social license to operate." The term so defined also overlaps with the term "meaningful public participation" as defined in the Aarhus Convention.

The social license to operate is usually site-specific and granted by a network of stakeholders. The company may have a social license for one operation but not for another. In addition, the broader the social, economic, and environmental impacts of a project, the more difficult it becomes to obtain a social license.

The consultation process is an essential part of stakeholder engagement. It is two-way communication between the project developer or its representatives and local and national communities to build early and meaningful relationships with key stakeholders. The consultation process in the context of the EIA allows local communities to express their views on project risks, impacts and mitigation measures, and allows the project

developer or its representatives to consider and respond to them. The consultation process must continue and be maintained throughout the life of the project.

The grievance mechanism is also an integral part of stakeholder engagement. This is essentially a procedure or process for identifying the views, concerns, and complaints (grievances) of stakeholders regarding possible adverse environmental and social impacts of the project. If properly established and managed, it significantly reduces project risks and the risk of litigation and associated costs.

Grievance is defined as “a complaint or a strong feeling that you have been treated unfairly”¹. That feeling can be based on real or perceived wrongs, and it is a cause of distress. It applies to “any act that involves unfairness to another or violation of one's rights”².

¹ <https://dictionary.cambridge.org/dictionary/english/grievance>

² <https://www.merriam-webster.com/dictionary/grievance>

2. SUMMARY OF THE PROJECTS

2.1. Wind farm ZD2P

Wind farm ZD2P (WF ZD2P) is planned in Zadar County, in the administrative area of Obrovac and Benkovac towns; 9 wind turbines are planned in the town of Obrovac, and 6 wind turbines in the town of Benkovac (Figure 2-1). WF ZD2P will be built in a hilly area about 5 km from the Karin Sea, 8 km from Obrovac, and 11 km from Benkovac. The wind turbines will be built in a northwest-southeast direction, parallel to the section of the Obrovac-Knin road, at an altitude between 620 m and 670 m and a length of about 8 km.

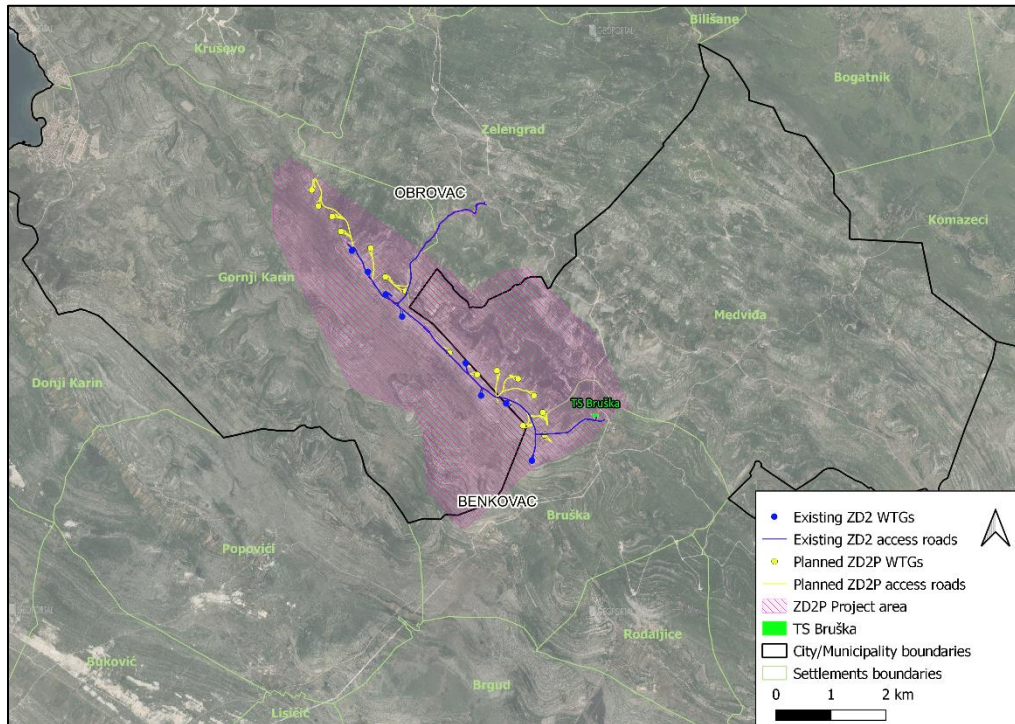


Figure 2-1 Location of the planned WF ZD2P and existing WF ZD2

The area is dominated by a natural landscape in the form of rocky grasslands and transitional areas of maquis and forests (Figure 2-2). Infertile soils and water shortages have resulted in agricultural land being confined to deposits in valleys and depressions, to which small settlements and hamlets are attached. The nearest settlements are more than 600 m away from individual wind turbines.



Figure 2-2 Wider area of planned WF ZD2P (existing WF ZD2 on the right)

WF ZD2P will be located within the area of the existing WF ZD2, which has been in operation since 2012. The existing ZD2 wind farm has eight wind turbines (Siemens SWT 2.3 MW) with a total connected capacity of 18 MW. The WF ZD2P configuration includes:

- 15 Nordex DELTA 4000 wind turbine generators (WTGs) and associated operating plateaus,
- internal access roads to individual WTGs, 5 m wide, in a corridor up to 10 m wide,
- underground MV cable and distributive telecommunication canalisation (along access roads),
- electrical connection point in the existing substation TS 20/110 kV Bruska.

According to valid environmental decisions and construction permits it is possible to install turbine model with rotor diameter up to 170 m and tip height up to 210 m. The selected Nordex DELTA 4000 WTGs fall within the maximum dimensions permitted under environmental decisions, location and construction permits. WF ZD2P will have total connected capacity of 68 MW.

Wind farm ZD2P was subject to national environmental impact assessment (EIA) procedures in 2014 and 2020 with associated public consultation and public disclosure in accordance with national legal and permitting requirements. Environmental decision with prescribed mitigation measures and monitoring plan have been obtained for both wind farms.

The ZD2P wind farm is owned by the special purpose company Kunovac d.o.o. (hereinafter the Company).

2.2. Wind farm ZD3P

Wind farm ZD2P (WF ZD2P) is planned in Zadar County in north-eastern part of City of Benkovac. WF ZD3P will be located in the hilly area above the settlement of Rodaljice. The relief is limestone plateau laid in northwest-southeast direction, at an altitude of between 400 m and 550 m (Figure 2-3).

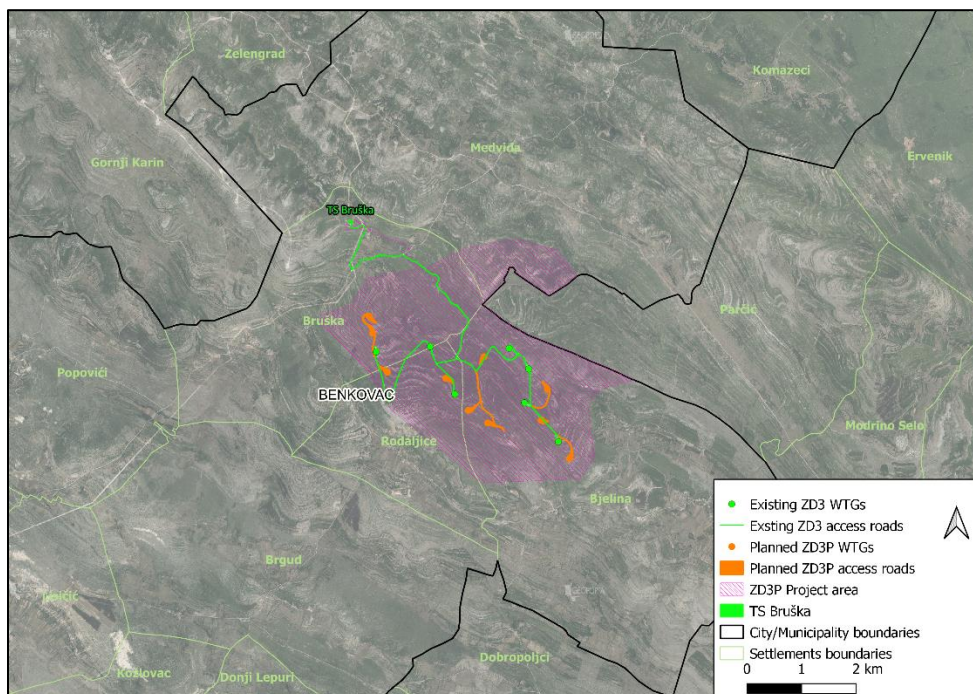


Figure 2-3 Location of the planned WF ZD3P and existing WF ZD3

Terrain is rocky mostly overgrown with dense lower vegetation (Figure 2-4). Wind turbines will be laid in the northwest-southeast direction. The wider area is mostly unsettled, with occasional areas of higher density (larger settlements) or legal population density (small hamlets). The nearest hamlets are more than

800 m from each wind turbine, except for Gornji Marinovići, the only hamlet that is inhabited and has about 20 houses. All other hamlets are either deserted or with few houses for occasional stay.



Figure 2-4 Wider area of planned WF ZD3P with WTGs of existing WF ZD3

WF ZD3P will be located within the area of the existing WF ZD3, which has been in operation since 2012. The existing ZD3 wind farm has eight wind turbines (Siemens SWT 2.3 MW) with a total connected capacity of 18 MW. Approximately 1.7 km to the northwest there are existing WF ZD2 with 8 WTGs as well as planned WF ZD2P with 15 WTGs. The WF ZD3P configuration includes:

- 10 Nordex DELTA 4000 wind turbine generators (WTGs) and associated operating plateaus,
- internal access roads to individual WTGs, 5 m wide, in a corridor up to 10 m wide,
- underground MV cable and distributive telecommunication canalisation (along access roads),
- electrical connection point in the existing substation TS 20/110 kV Bruska.

According to valid environmental decisions and construction permits it is possible to install turbine model with rotor diameter up to 170 m and tip height up to 210 m. The selected Nordex DELTA 4000 WTGs fall within the maximum dimensions permitted under environmental decisions, location and construction permits. WF ZD3P will have total connected capacity of 43 MW.

Wind farm ZD3P was subject to national environmental impact assessment (EIA) procedures in 2014 and 2020 with associated public consultation and public disclosure in accordance with national legal and permitting requirements. Environmental decision with prescribed mitigation measures and monitoring plan have been obtained for both wind farms.

The ZD3P wind farm is owned by the special purpose company VENTUS FLATUS d.o.o.

Location of both planned WFs ZD2p and ZD3P as well as existing WFs ZD2 and ZD3 is shown in Figure 2-5.

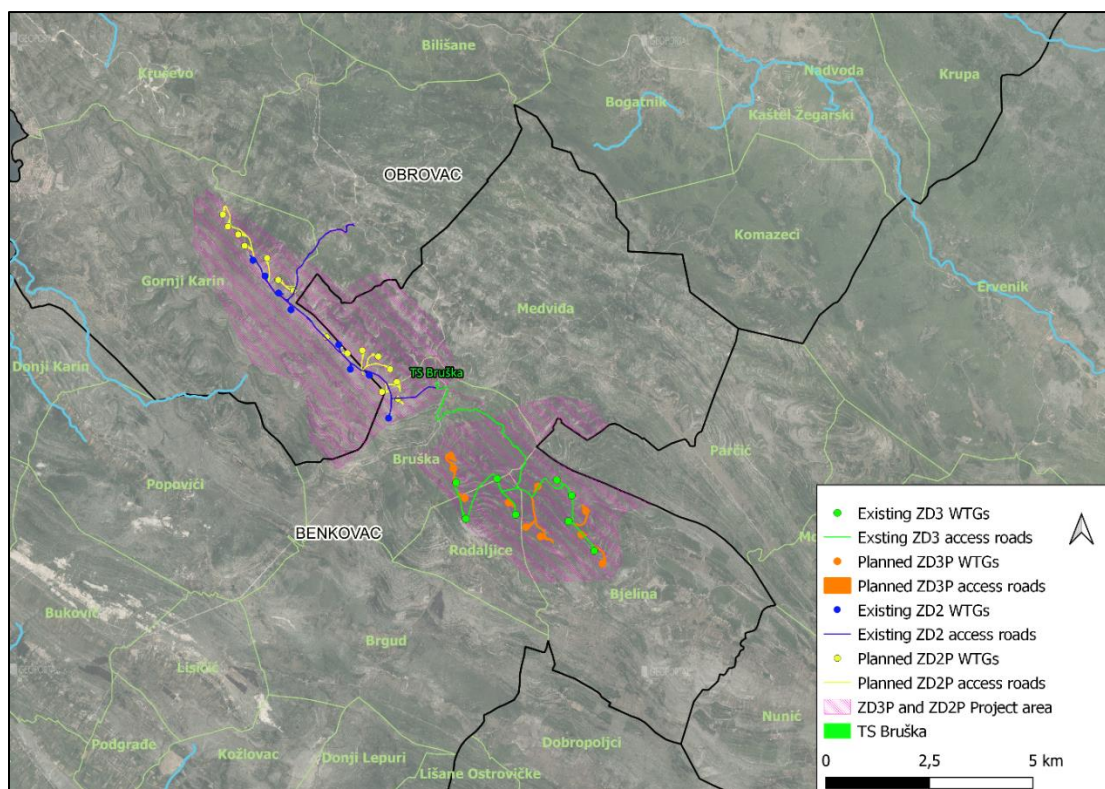


Figure 2-5 Planned WFs ZD2P and ZD3P and existing WFs ZD2 and ZD3

The developer of both projects is a company is ENCRO Ltd. (hereinafter the Project Developer) which is responsible for the overall technical and commercial management of the Project. Project Developer has been successfully managing several wind farms in Croatia:

- WF Zadar 6 - 9 MW capacity in operation since 2011
- WF Zadar 6 - extension - 44.2 MW extension; in operation since 2017
- WFs Zadar 2&3 - 36 MW; in operation since 2012
- WF Voštane Kamensko - 40 MW in operation since 2013
- WF Zadar 4 - 9 MW in operation since 2013.

Both wind farms have been initially screened as a category B projects, following the European Bank for Reconstruction and Development's (EBRD) Environmental and Social Policy (2019). Results of ESDD confirmed initially screened category B, since the potential adverse environmental and social impacts will be largely reversible and can be mitigated through already available and recommended mitigation measures.

Indicative development timeline:

Table 2-1 Project development indicative timeline

Phase	Date (indicative time frame)	Activities
Construction	March 2022 – August 2023	Civil works Electrical works WTG erection, finishing, cabling and QA
Testing and commission	May 2023 – November 2023	Tests (WF and WTS)
Operation	December 2023 + 30 years	Production
Decommissioning	30+ years	Decommissioning works

3. REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT AND KEY ISSUES

3.1. Public information and participation provisions in Croatian legislation

Requirements in relation to public disclosure, participation and access to information kept by state bodies and organisations, as well as the right to petition state authorities and the right to a healthy environment in Croatia are prescribed by the Constitution of the Republic of Croatia (Official Gazette No. 56/90, 135/97, 08/98, 113/00, 124/00, 28/01, 41/01, 55/01, 76/10, 85/10, 05/14).

Croatia ratified the Aarhus Convention in 2006, by adopting the Regulation on Confirming the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Official Gazette No. 1/07). The basic principles contained in this Convention are supported by other Croatian laws and bylaw but particularly by The Environmental Protection Act. These regulations require the public to be informed about and involved in all matters concerning the environment.

In accordance with the Environmental Protection Act, the public authority is obliged to ensure access to environmental information, which it owns and / or supervises. Additionally, bodies responsible for implementation of environmental impact assessments (EIA), are obliged to inform the public about the procedure. The manner of informing and involving the public and the manner of holding public disclosure and consultations are regulated by the Regulation on the information and participation of the public and interested public in environmental matters (Official Gazette No. 64/08).

Croatia also has a Law on the right to Access to Information (OG 25/13, 85/15), which stipulates that every citizen (in any capacity) as well as every legal entity (company, civil society association, media, institution, etc.) has the right to access information of a public nature³. Public information is information in the possession of public authorities, generated during the work or in connection with the work of public authorities, contained in the document, and refers to everything that the public has a legitimate interest in knowing, except when information or parts of it are protected by law to preserve other important interests (e.g. privacy or national security).

The stakeholder engagement as a part of the EIA procedure is undertaken by the Ministry of Economy and Sustainable Development and in line with the Environmental Protection Act (Official Gazette No. 80/13, 153/13, 78/15, 12/18, 118/18). Practise shows that it is merely focused on "administrative compliance" and "reduced to formality" as discussed in Section 3.3., which is important for better understanding the project environment, and better managing of project risks and opportunities.

In summary, the procedures for disclosure and consultation involve the following steps:

- The public is informed through the media and the Ministry's website of the details of the disclosure of the draft plan/document (where the paper version is available for inspection, the dates, and the time when it can be inspected). The document disclosure period is 30 days.
- Citizens/organizations are invited to send comments and/or participate in public consultations. Public hearings are held at an appropriate location (e.g., City Hall) and the plan/document is presented.

³ https://pristupinfo.hr/wp-content/uploads/2018/10/Vodic_za_korisnike-_e_book.pdf?x66719

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- Comments received from all stakeholders are processed and the document is revised to reflect them. A report of accepted and unaccepted comments, with reasons, is sent with the draft plan/document to the relevant authorities, who assess whether the comments have been meaningfully considered and addressed.
 - Citizens may request that their comments be responded to in writing.

3.2. EBRD requirements

The EBRD considers stakeholder engagement to be an essential part of good business practices and corporate citizenship and a way to improve project quality, as defined in [Performance Requirement 10: Information Disclosure and Stakeholder Engagement](#). Stakeholder involvement must be tailored to each client and project, "depending on the risks and negative impacts on affected communities, the sensitivity of the sector and the environment, and the level of public interest. "

PR10 specifies that stakeholder engagement involves the following elements:

1. Identification of stakeholders (individuals and groups) and their analysis,
2. Plan for engaging with stakeholders,
3. Public disclosure of timely, relevant, understandable, accessible and appropriate information (free of manipulation, interference, coercion and intimidation),
4. Meaningful consultation and participation,
5. Grievance mechanism – effective procedure for making comments and raising complaints,
6. Ongoing communication ("report to" implying accountability for impacts)

Stakeholder engagement is expected to start at the earliest stage of project planning (when all options are still open) and continue throughout the life of the project and should be done in combination with PR1 and PR2 requirements. The client must establish clear roles, responsibilities and authorities, and designate staff responsible for implementation and monitoring. Although not explicitly written, stakeholder analysis implies the identification of key environmental and social issues raised by individuals and/or groups because they reflect the public's concerns and allow the developer and public authorities to adequately address those concerns.

3.3. Key issues related to public participation in environmental decision-making Croatia

The practice of public participation in environmental (and social) decision-making in Croatia is often described by various stakeholders as insufficient, costly, lengthy, complicated, poorly implemented, and lacking the necessary rigor and effectiveness. In the years following the ratification of the Aarhus Convention and the introduction of the EIA procedure, the main complaints raised by various stakeholders are given in Table1-2⁴.

⁴ Based on publicly available data (media reports, expert research, field experience on various projects which included EIA procedures)

Table 3-1 Key stakeholder complaints on the EIA procedure

Developers/investors	Activists / citizens	NGOs
<ul style="list-style-type: none"> - Long and costly procedure tending to slow down and hamper implementation of key projects (energy and waste often in the spotlight of heated debates) and decisions. - "Inconsistencies" in relevant Croatian legislation and its implementation, lack of timely and appropriate law enforcement, lack of adequate and timely coordination in between ministry departments, between ministries and between national and local governments. - NGOs are aggressive and non-inclusive, they manipulate and scare citizens, make unfounded and false claims, address the shortcomings in procedure and make complaints to EC and Croatian judiciary, put pressure through media in streamlining public opinion. - Simplified and sensationalist media coverage of the EIA. 	<ul style="list-style-type: none"> - Investors are just looking at how to make money on people, and they don't care about their health, interests, and the environment. - Significant and muddy role of politics on national and local level regarding selection of locations and in pursuing some projects. - EIA study makers, experts, competent authorities and members of the competent authority commissions are mainly 'mercenaries' and cannot be trusted. - Nobody asks people anything – they don't want to be 'guinea pigs'. - Why is project seated 'in my backyard', and not in 'somebody else's backyard'? - The state will not protect 'the little people'. 	<ul style="list-style-type: none"> - Public and interested public are not well-informed regarding EIA procedure and possible ways of participation. - Investors are generally not interested in stakeholder engagement and consultation – lacking sincere interest to include public in consultation process while the options are still open. - Competent authorities tend to ignore and/or reject complaints and comments raised by public without explanation – they have no impact on decision-making. - Competent authorities only fulfil the form and obey the minimum – simplified implementation of the procedures regulated by law. - Doubts about the expertise and impartiality of EIA study developers and experts. - If the public lacks extensive knowledge of a particular subject (laid public), how come that with each new regulation EU is giving the public more and more rights?

BIOM is non-governmental organisation that actively participates in EIA procedures and is vocal about the shortcomings in the implementation of the Aarhus Convention in Croatia, with a particular focus on bird fauna. BIOM has been a full partner of BirdLife International, the international umbrella organisation for the protection of birds, their habitats and biodiversity worldwide, since 2018. Already in 2018 and 2019, BIOM warned the Commission about shortcomings in the EIA procedures in which it was involved, as well as the subsequent lawsuits, most of which were dismissed by the Croatian courts. Also, at the European Commission's annual meeting with Croatian civil society organisations in November 2018, BIOM warned about the shortcomings in the EIA and main impact assessment on Natura 2000 procedures for the wind farms (planned mainly on the Croatian Adriatic coast in the areas protected under the Natura 2000 ecological network as important protected areas for birds). Indeed, they found "certain shortcomings and systematic failures that indicated that assessment of impact of wind farm projects on Natura 2000 sites is

not functioning as it should in relation to the European *acquis communautaire*.”⁵ As a result, the Commission's May 2020 infringement package⁶ called on Croatia “to improve its application of the Habitats Directive ([Council Directive 92/43/EEC](#)) concerning assessment of impact of wind farm projects on Natura 2000 sites”⁷. Among the others, European Commission analysed the EIA procedures for the wind farm ZD2P (corrections from 2019) and the wind farm ZD3P (corrections from 2019) and found no shortcomings.

⁵ <https://www.biom.hr/europska-komisija-prvi-put-pokrenula-postupak-protiv-hrvatske-zbog-procjena-utjecaja-na-okolis/>

⁶ It is the second time the Commission initiated infringement proceedings in relation to the application of the Habitats Directive: *In 2016, the Commission initiated infringement proceedings against Croatia for non-conformity of its national legislation with the Habitats Directive and the Birds Directive. The amendments to the ‘Law on nature protection’ adopted in 2018 significantly improved conformity with the Nature Directives* (The Environmental Implementation Review 2019, Country Report Croatia, 2019).

⁷ https://ec.europa.eu/commission/presscorner/detail/en/inf_20_859

4. STAKEHOLDER ENGAGEMENT DURING THE EIA PROCEDURE AND BEYOND

In communicating with stakeholders, developer had focused primarily on the information and consultation processes required by law, as described in Section 3.1. as well as regular contacts with relevant authorities regarding permits. Information about public hearings during the EIA procedure was published in local newspapers, on public notice boards, and on the Zadar County website. Public hearings at which the environmental impact studies were presented and discussed were held in Obrovac and Benkovac. The public was able to submit written comments, suggestions, and complaints at the locations where the environmental impact study was available for inspection in the City of Obrovac, the City of Benkovac and Zadar County or by post. The comments received were addressed and elaborated in a separate hearing report prepared for the ZD2P wind farm and the ZD3P wind farm (Class: 351-03/13-01/3, Reg. No.:2198/1-07/2-14-9). The Environmental Decision includes a description of the public hearing process and information on how public comments were addressed. No administrative objections to the Environmental Decision were raised.

In addition to EIA-related activities, ENCRO has conducted the following community-based activities over the past three years:

- Donation of masks and gloves in the first wave of the pandemic in 2020 to Zadar County, the City of Benkovac and the City of Obrovac
- Purchase of local products from family farms in the village of Gornji Zrilići (mainly honey)
- In 2021 and 2022, in cooperation with the town of Benkovac, as part of the project "Development of thematic routes of ancient and medieval towns in the town of Benkovac", bicycle paths will be created on the territory of the WF and the tourist offer will be expanded. ENCRO contributes at its expense with erection of additional educational boards about the local flora and fauna and the wind farm.
- Hiring local workers from the hamlet of Gornji Zrilići for the maintenance of existing roads at WF ZD2 and ZD3 and additional works of repairing container substations near existing wind turbines
- Hiring local workers for the vegetation management during conducting a trial archaeological research of the potential archaeological sites on WF ZD3P
- Yearly Christmas banquets for wind farms situated in Zadar municipality, which often included participation of TSO (HOPS) employees, local fire brigades and police officers.

4.1. Wind farm ZD2P

In line with information disclosure and public consultation legal requirements, stakeholder engagement for the ZD2P wind farm was organized on two occasions:

1. during the EIA procedure for the ZD2P wind farm in 2013/2014,
2. during the screening process for the ZD2P wind farm modifications in 2020,

During the EIA procedure, the Environmental Impact Study was publicly disclosed from 4 December 2013 to 3 January 2014. The EIA (*Studija o utjecaju na okoliš za zahvat: Vjetroelektrana Kunovac ZD2P na lokaciji Grad Obrovac (dio) i Grad Benkovac (dio), APO d.o.o., 2014*) was prepared by the authorized company APO Ltd. Information about the public hearing was published in a local newspaper, Zadarski list, on 26 November 2013. Public hearings were held on 19 December 2013 in City of Obrovac at 11 am and City of Benkovac at 1 pm. The Ministry of Environment and Nature Protection issued an Environmental Decision (Class: UP/I 351-03/13-02/20, Reg. No.: 517-06-2-1-1-14-21, 15 July 2014.) that the planned WF ZD2P is acceptable for the

environment and ecological network with the implementation of prescribed mitigation measures and post-construction monitoring plan.

In line with the technological innovations and new knowledge on wind turbine design and operation, the developer has decided to introduce a new type and capacity of WTGs. The original project of WF ZD2P was changed in 2019:

- the capacity of WTGs was increased from 3 to up to 5 MW
- the number of WTGs was reduced from 16 to 15
- the total capacity of WF has been increased by 20 MW and now totals 68 MW.

The changes to the project were subject to the EIA procedure in 2020. Instead of the full assessment, a screening process was carried out as well as a preliminary assessment of acceptability for the ecological network. The Environmental Report was prepared by the authorized company CIAK Ltd (*Elaborat zaštite okoliša za postupak ocjene o potrebi procjene utjecaja na okoliš za zahvat izmjena tehničkog rješenja vjetroelektrane (VE) ZD2P, CIAK d.o.o., 2020*). The project was approved by an environmental decision (Class: UP /I 351-03/20-09/179, Reg. No: 517-03-1-1-20-11, 26 October 2020), which stated that the full EIA procedure and an adequate assessment of acceptability for the ecological network, were not needed. The mitigation measures and monitoring plan defined during the EIA procedure in 2014 remained unchanged. The environmental decision is valid for two years if a location permit is granted during that time. The decision can be extended for a further two years.

No new environmental permit was required.

4.2. Wind farm ZD3P

In line with information disclosure and public consultation legal requirements, stakeholder engagement for the ZD2P wind farm was organized on two occasions:

1. during the EIA procedure for the ZD3P wind farm in 2013/2014,
2. during the screening process for the ZD3P wind farm modification in 2020

During the EIA procedure, the Environmental Impact Study was publicly disclosed from 4 December 2013 to 3 January 2014. Environmental impact study (*Studija o utjecaju na okoliš za zahvat Vjetroelektrana Visibaba ZD3P na lokaciji Grad Benkovac, APO d.o.o., 2014*) was prepared by the authorized company APO Ltd. Information about the public hearing was published in a local newspaper, Zadarski list, on 26 November 2013. Public hearing was held on 19 December 2013 City of Benkovac at 1 pm.

Within the EIA procedure an appropriate assessment of the ZD3P project and its implications on ecological network was undertaken. The Ministry of Environment and Nature Protection issued an environmental decision (Class: UP/I 351-03/13-02/21, Reg. No.: 517-06-2-1-1-14-20, 15 July 2014.) that proposed wind farm ZD3P project is acceptable for environment and ecological network if the prescribed mitigation measures and post-construction monitoring plan are implemented.

In line with technological innovations and new knowledge about wind turbine design and operation, the project developer has decided to introduce a new type and capacity of WTs. The original project of WF ZD3P was changed in 2019:

- WTG capacity was increased from platform 3 MW to a more advanced turbine class with flexible rated power (type Nordex Delta 4000 platform),
- The total capacity of WF was increased by 20 MW and totals 53 MW.

The changes to the project were subject to an EIA process in 2020. Instead of the full assessment, a screening process was carried out, as well as a preliminary assessment of acceptability for the ecological network. The environmental report was prepared by the authorized company CIAK Ltd (*Elaborat zaštite okoliša za postupak ocjene o potrebi procjene utjecaja na okoliš za zahvat izmjena tehničkog rješenja vjetroelektrane (VE) ZD3P*, CIAK d.o.o., 2020).

The project was approved by an environmental decision (Class: UP /I 351-03/20-09/179, Reg. No.: 517-03-1-1-20-11, 26 October 2020), which stated that the full EIA procedure and an adequate assessment of compatibility for the ecological network were not required. The mitigation measures and monitoring plan established during the EIA process in 2014 remained unchanged. Under the Environmental Protection Act, the operation of wind farms is not subject to environmental permitting. No new environmental permit is required, and the new location permit was issued in December 2021.

4.3. Key stakeholders' comments / issues addressed

Comments and complaints received during the public consultations were compiled into a report. Key questions of interest and answers of the authorized company APO d.o.o. summarized in the document *Study of responses to comments received during the public hearing* were as follows:

Table 4-1 Key questions/comments from public hearing

Key questions/comments	Answers
Concerns related to the wind farm's negative impact on traditional livestock farming	- According to industry practice and published data, there are no elements that indicate that wind farms affect livestock breeding, or the quality of livestock products. We do not have data that the construction of the wind farm VE ZD2 in any way affected the reduction of production of milk, wool, cheese or other sheep products from the area of Benkovac and Obrovac. Also, we do not have data that the commissioning of the wind farm has reduced the quality of these products.
Concerns related to accidents around the wind farm (turbine collapse, wind turbine blades falling, ice on blades), and request for clarification of the safety zone around the wind farm	- During the use of the wind farm, measures for maintenance of electric installations must be applied (regular, periodic, extraordinary, Ordinance on technical requirements for electric power plants with nominal alternating voltages above 1 kV (Official Gazette 105/10) and measures for regular servicing of all technical plants, especially mechanical parts. The operation of each wind turbine is monitored by WPS (Wind Power Supervisor) and TCM (Turbine Condition Monitoring) systems.
Concerns about noise and the possibility that it exceeds 40 dB at the nearest houses, the impact of noise on livestock	- Considering the submitted remarks on noise, made by the local population, during the public debate, the project owner optimized the conceptual design of the layout of wind turbines. In the conceptual design, the micro-locations of the wind turbines were moved, which were pointed out in the remarks as "the most critical" with regard to the nearby settlements. Therefore, the micro-locations of wind turbines VA11, VA34, VA35 are significantly distant from the

Key questions/comments	Answers
Concerns over poor conditions of roads nearby the wind farm	<p>construction areas of the settlement depending on the terrain configuration and safety calculations.</p> <ul style="list-style-type: none"> - As it was warned at the public hearing held on 19 December 2013, in the area of the ZD2 wind farm, a certain amount of land was applied to the area called "Lokve", near wind turbines VA1 and VA8. Public comments is accepted and the area was repaired, i.e. returned to its original condition. Rehabilitation of forest firebreaks with elements of the forest roads at the location of WF ZD2, in February 2014, prevented further deposits of gravel by torrent on the local road Obrovac-Medviđa in the village Zelengrad during rainy periods. The road access to the forest firebreaks leading from the village of Zelengrad to the location of WF ZD2 has also been repaired. Appropriate rainwater drainage has been built at critical points of firebreaks. Also, during the works, the local road 63165 (Medviđa-Bruška) which passes through the hamlet of Zrilići was cleaned.
Concerns that affected residents have limited direct benefit from the construction and operation of the wind farm	<ul style="list-style-type: none"> - The benefit for the local community is significant in the increase of budget revenues in the period of twenty years, which is determined by the Electricity Market Act (Official Gazette, No. 22/13). The provisions of the said Law stipulate that the investor, for the premises where the buildings to produce electricity are located, pays compensation to the units of local self-government. The Government of the Republic of Croatia prescribes the amount of compensation and the manner of its distribution. It is also important to note that the investor has an obligation to pay significant funds - utility fees - for the need to build local community infrastructure. In the case of the construction of ZD2P and ZD3P wind farms, according to the calculation of electricity production, the income for the local community would amount to around HRK 2,300,000.00 per year. Also, the developer pays a part of the realized income to the budget of the Republic of Croatia as a fee for land use.
Concerns about the proximity of wind turbines to nearby houses (some less than 500 meters)	<ul style="list-style-type: none"> - The conceptual design of the WPP ZD2P project was made in such a way that all wind turbines were planned at micro-locations where the criteria from the spatial planning documentation were considered, including the criterion of distance from the construction areas of the settlement. In this way, 16 planned wind turbines were positioned at distances greater than 500 m from the nearest construction areas of the settlement
Concerns over impact of wind turbines on bat population (Golubinjača Cave), with need for further study and monitoring	<ul style="list-style-type: none"> - The Golubnjača cave site is about 12 km away from the project site (in the east direction), and the statement from the remark that some wind turbines are planned next to the famous Golubnjača cave is unfounded. There is also the toponym Golubnjača cave in the project area - however, this locality is not endangered

Key questions/comments	Answers
Need for additional monitoring of bird flight and nesting birds during spring and autumn	<p>by the installed wind turbines, as indicated by the results of geotechnical research work carried out before the start of construction.</p> <ul style="list-style-type: none"> - During the research of ornithofauna at the site of the project, special attention was paid to the observation of migratory bird populations, and in accordance with the annual cycle, the research also included autumn and spring migration. The basis for determining the zones of influence on the ornithofauna were the areas of distribution of the most endangered bird species, wild eagles and snake eagles and areas of flight of larger species of birds, especially cranes and predators. Based on the available expert analyzes and available data, no conflict situations were observed with regard to impacts on ornithofauna, and therefore it was not necessary to prescribe additional mitigation measures. - The remark of the BIOM association supplementing the ornithofauna monitoring program after the commissioning of the ZD2P wind farm is accepted and we are of the opinion that any initiative aimed at improving the quality of protection measures in wind farm fields is more than welcome.
Lack of clear and comprehensive description of impacts on bats	<ul style="list-style-type: none"> - With regard to the effects on bats, the assessment of the impact of the intervention on bats is based on the results of field research of bats, which are outlined in detail in the relevant chapters of the EIA VE ZD2P. Based on the results of continuous monitoring of bat activity at the project site, it was estimated that the project will not affect bats and therefore it is not necessary to introduce mitigation measures related to non-regulation of wind turbines because there is no negative impact.
Negative impact of wind farm on bees	<ul style="list-style-type: none"> - From a scientific point of view, it has not been proven that electromagnetic radiation (the presence of transmitters from mobile operators and other radiation sources, including wind farms) affects disorientation, i.e., behavioural disorders of bees. According to the European Food Safety Authority (EFSA), the use of pesticides, rather than the presence of electromagnetic radiation, is a frequent cause of endangerment of bees

4.3.1. Media coverage & publicly available data

Narodni list, the local news portal, published on 21 December 2013 an article about the main complaints of the residents of Medviđe and Bruške who participated in the public hearing organized on December 19, 2013 in the town of Benkovac and the town of Obrovac (available at: [Stanovnici Medviđe nezadovoljni gradnjom novih vjetroelektrana - narodni-list.hr](http://narodni-list.hr)). The article states that "at the public hearing, citizens asked questions to the investor Kunovac d.o.o., representatives of APO d.o.o. and about 20 interested citizens".

BIOM has requested documents related to the ZD2P and ZD3P wind farms on two occasions through the Imamo Pravo Znati Pro (We Have the Right to Know) website, a special tool for access to information for journalists, activists, and researchers. The request was made in accordance with the Law on the Right of

Access to Information and addressed to the Ministry of Construction and Physical Planning:

1. on July 17, 2019, the BIOM requested decisions for the ZD2P and ZD3P wind farms that the projects are acceptable to the ecological network. The Ministry posted the documents on its website on July 25, 2019.
- 2 On August 20, 2019, the BIOM requested all issued siting permits (including amendments to siting permits). The Department posted the documents on its website on September 6, 2019.

There is no publicly available information about the activities of ENCRO Ltd. or the special purpose company Kunovac Ltd. aimed at creating and maintaining good local relations (Obrovac, Benkovac, Zadar County), beyond strictly legal requirements.

5. STAKEHOLDER ENGAGEMENT PLAN

Stakeholder engagement is a dynamic, non-linear process and cannot be managed in the same way as is usually the case with technical projects, where the focus is on technical, financial, regulatory, legal and administrative aspects of the project, and where individuals and groups are usually seen as a means to achieve business objectives. On the contrary, in stakeholder engagement, individuals and groups are considered as those who need to be adequately informed and meaningfully involved in project development, based on the project impacts and “in proportion to the potential impacts associated with the project and the level of stakeholder interest”⁸. Due to dynamic character of stakeholder engagement the SEP should be regularly updated, especially project stakeholders (their relevance to the project and potential impacts are not the same in all project phases), key issues of interest and reputational risks, and channels and tools for communication.

5.1. Main objectives and strategies

The main objectives to be achieved by the SEP are the following:

- Creating a platform for ongoing communication with stakeholders (information and two-way communication and engagement)
- Establish internal communication channels that ensure a steady flow of information and timely and effective coordination
- Establishing simple and easy to follow procedures for the timely identification of and response to stakeholder comments, concerns, and complaints
- Ensure consistency and credibility in communications
- Establishing and maintaining a good reputation for the project and its developer

To achieve the above objectives, use the following strategies:

- Focus on the project development agenda but maintain openness and flexibility when addressing stakeholder concerns and expectations
- Ensure transparency and responsiveness in communications while protecting business interests
- Openly address the concerns and fears of all relevant stakeholders and involve them in decision-making (risk mitigation)
- Ensure that stakeholder expectations are met in a fair manner and provide credible explanations when they cannot realistically be met.

5.2. ZD2P and ZD3P wind farm project stakeholders

In the project development of the ZD2P and ZD3P wind farms, we will distinguish the following stakeholder groups based on their role, interest, or influence (power to influence):

⁸ <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

Table 5-1 Stakeholders' classification

Stakeholders directly or indirectly affected by project implementation	Stakeholders directly or indirectly involved in project	Stakeholders that can influence project implementation
Residents who live near the wind turbines (settlements and hamlets near Obrovac and Benkovac)	Kunovac Ltd. (the special purpose company)	Competent ministries, agencies and regulators on national and EU level: Ministry of Physical Planning, Construction and State Assets Ministry of Economy and Sustainable Development Ministry of Agriculture Croatian Energy Regulatory Agency Republic of Croatia State Inspectorat Croatian Civil Aviation Agency Croatian Forests European Commission
Resident of settlements and hamlets along the possible transport routes from the port of Gaženica to the site	ENCRO Ltd.	HOPS (transmission system operator – grid operator)
Residents of Benkovac (improved quality of life due to fees to municipal administration, working opportunities)	Employees and contractors of the civil works, WTG and equipment suppliers, and future wind farms operation	BIOM and other NGOs on national (Zelena Istra, Zelena akcija) and local level (Eko-Zadar, Planinarsko društvo Belveder)
Residents of Obrovac (improved quality of life to fees to municipal administration, working opportunities)	International financial institutions that could consider financing the project	City of Benkovac Mayor, City Council, City Administration
City of Benkovac Mayor, City Council, City Administration	Police and fire brigades	City of Obrovac Mayor, City Council, City Administration
City of Obrovac Mayor, City Council, City Administration		Zadar County Prefect, County Council, County Administration
Zadar County Prefect, County Council, County Administration		National media (specialized and general)
		Local media (Zadarski list, 057...)

This list of **internal and external** stakeholders should be regularly updated. Stakeholders must be prioritized, which helps in identification how much time and attention should be devoted in a particular project phase to individuals, groups, organizations, institutions based on two factors: their level of interest in the project and their power to influence the project and its outcomes.

5.3. The structure of communication channels – according to importance

Communication channels refer to the methods we use to communicate and the specific tools we use in the communication process. They are a medium for two-way communication and dissemination of information. Each channel has its specific characteristics, some are more information-rich than others. A face-to-face

conversation is used when we want to convey facts and emotions, while websites are mainly used to convey facts, but they can also be designed to trigger engagement and emotions.

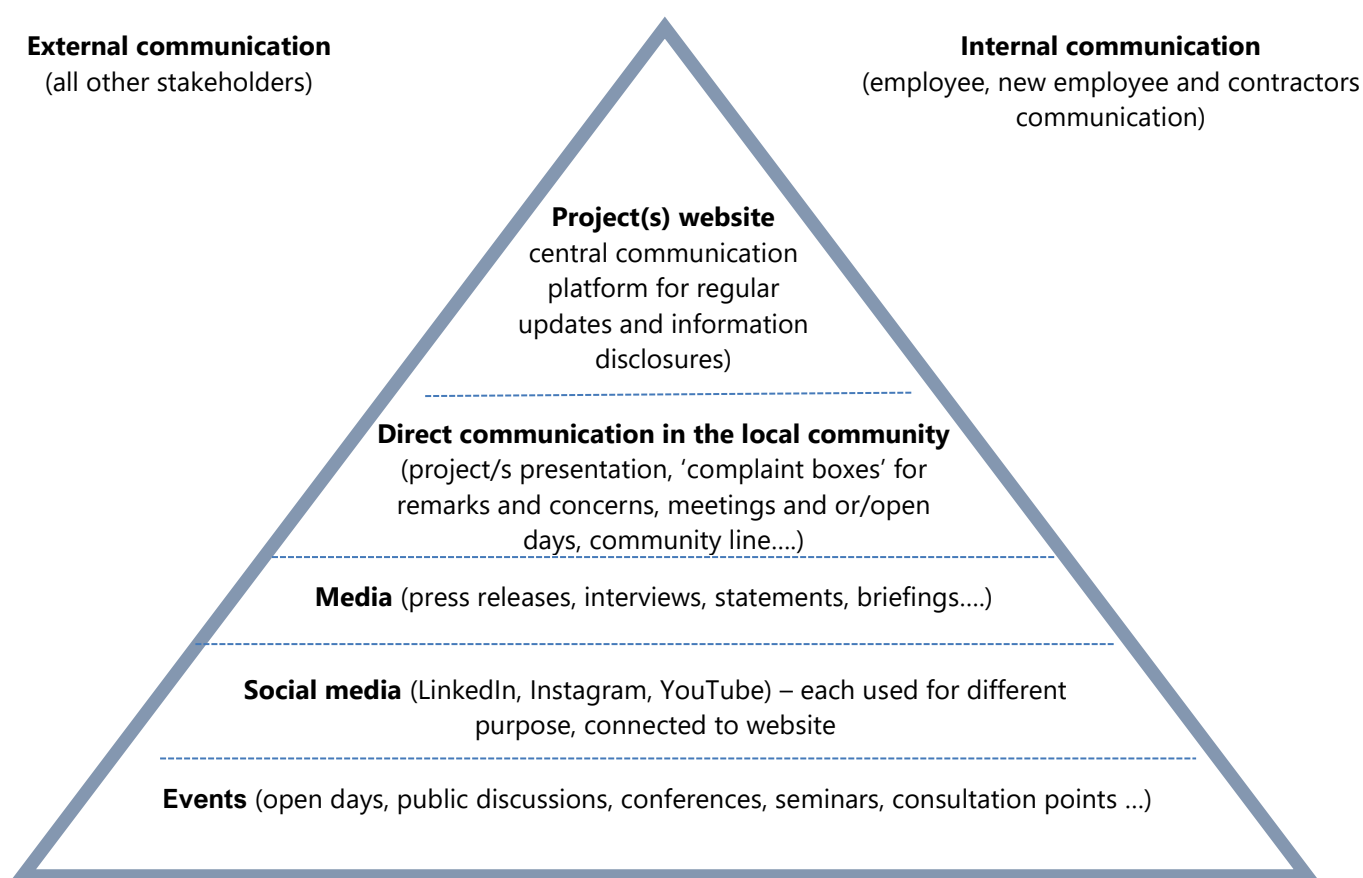


Figure 5-1 Structure of communication channels

5.4. Key action points

The activities are divided into two main phases: preparation phase and implementation phase. The preparation phase includes all activities that ensure that the project has the main communication elements (primarily the website as the central communication platform), as a necessary basis for the implementation of activities during the construction, testing, and post-construction phases. The activities are also listed by stakeholders in each phase of the project.

5.4.1. Preparatory activities

Table 5-2 Preparatory activities

Phase	Key action points	Resources	Activities
Preparatory (February – March/May 2022)			
	Capacity for the execution of the SEP	Internal and/or external	Assessment of internal capacities for regular stakeholder engagement activities Appointment of 'Stakeholder Engagement Specialist'

Phase	Key action points	Resources	Activities
	Project website⁹	External	Selection of contractors Web site layout and content, and key functionalities (Content Management System for independent content editing & updating, web form for expressing views, concerns, and/or complaints) Domain selection Website upload
	Project ID brochure and infographic (in Croatian and English)	External	Selection of contractors Brochure concept and content Brochure
	Project presentation	Internal or external	The project template (visual design) Presentation concept and content
	Project Q&A 'Lines to take'	Internal or external	List of all questions being asked about the project with answers (list to be regularly updated) Key messages for representatives of developer so they can give a consistent message to stakeholders
	Grievance Policy (Kunovac d.o.o. / VENTUS FLATUS d.o.o.) Template/register of complaints Complaint Form on web site Grievance boxes in local community and/or at the sites*	Internal or external	Policy to inform all stakeholders (internal and external) about developer approach to address stakeholders' complaints promptly and effectively Develop internal capacities for a mechanism for dealing with complaints Template to keep a log of all complaints Publish Complaint Form on web site (see Section 7) Place grievance boxes in local community and/or at the sites (see Section 7)

*The most important action points are printed in bold.

5.4.2. Implementation

The local public (residents on possible transport routes, residents of surrounding settlements and hamlets) will be informed in a timely manner about the progress of works in the local media. If necessary, other activities will be organized, such as consultation events. Communication with residents during construction will also include the collection and analysis of complaints that may arise due to increased traffic or disruptions in construction. The form and brief instructions for filing complaints will be available on the project website, in the local community and at wind farm locations.

During the construction and subsequent operation of the wind farm, communication with the authorities will focus on providing reports, documentation and measurement reports required by law (operational plan and grid test program for WF ZD2P and WF ZD3P, noise measurement, low frequency electric and magnetic field measurement, electrical measurements, etc.), clarifying issues and participating in formal meetings. Competent authorities (e.g., HOPS) will be invited for site visits and clarification of project or operational status regarding WF energization and connection to the grid.

Monitoring reports will be submitted to the relevant authorities (Ministry of Economy and Sustainable Development) in accordance with the binding obligations under the Environmental Decisions. The company will prepare news about the project progress and environmental and social performance and publish them on the website. In addition, the start of trial operation and operation will be announced in the local press and

⁹ One website can feature information about two or more projects.

submitted to the Ministry of Physical Planning, Construction and State Property and HOPS. If necessary, additional information will be provided to the media (national and local) and the local community.

A special event may be organized to celebrate the official start of operations. During the operation of the wind farm, the company will monitor the impact on residents who may be affected by noise pollution by collecting and analysing complaints submitted and addressing them as appropriate. According to the monitoring program, noise level measurements will be carried out after construction and every 3 years.

The company will keep the local community and other stakeholders informed about the project at all stages of the wind farm's development (primarily through information on the company's website and through articles and other media formats in local or national news media). The company will also monitor media coverage to respond to and refute misinformation in a timely manner, if necessary. Should any issues be raised by stakeholders, management will respond accordingly in the shortest possible time.

Activities are also listed in the table below by stakeholder groups:

Table 5-3 Activities by stakeholder groups

Stakeholders	Communication methods	Proposed dynamic	Responsibility
Stakeholders directly or indirectly affected by project implementation			
Residents of places where investment works will be implemented	Company website Contact points at construction sites Local media Direct contacts initiated by residents.	Commencement and completion of the construction works and in reaction to submitted grievances during and after the investment process	The Company Project Manager and/or 'Stakeholder Engagement Specialist'
Residents and institutions along transport routes during construction	Company website Local media Roadside and claims handling assistance- HAK (www.hak.hr)	Prior commencement and during transportation works.	The Company Project Manager and/or 'Stakeholder Engagement Specialist'
Organizational stakeholders			
Company employees	E-mail Meetings	Continuously, during the project lifetime	The Company Project Manager
Construction companies and WTG and equipment suppliers	According to the agreements between the company and construction companies, equipment suppliers	Before the commencement of works regarding the investment and then during construction and operation of the wind farm.	Project Manager
Grid operator			
HOPS (Transmission System Operator)	E-mails Meetings Exchange of documents and correspondence about the project	On as needed basis, but before trial run operation and during the whole Project lifetime	Company Management, Project Manager
PPA counterparty and electricity market			

Axpo solutions AG	E-mails Formal letters	After completion of construction works and before the PPA start date	Company Management
Croatian Energy Market Operator	E-mails Formal letters Exchange of documents and correspondence about the project and participation in the electricity market	Prior to trial operation and throughout the life of the project.	Company Management
“Administrative” Stakeholders			
Ministry of Physical Planning, Construction and State Assets	Formal letters, notifications, meetings on as needed basis	In accordance with the requirements of administrative procedures, prior to trial run and usage permit	Company and project management
Croatian Energy Regulatory Agency	Exchange of documents and correspondence about the project	After the granting of the use permit. Also during the project period, as needed, in accordance with legal requirements.	Company Project management
Ministry of Economy and Sustainable Development	Submission of environmental monitoring reports - exchange of information, documentation, and correspondence about the project	After completion of construction works and throughout the life of the project	Company Project management Environmental specialist
Ministry of Agriculture	Formal letters, exchange of documents, submission of land lease contracts	Prior to construction works	Company Project management
Republic of Croatia State Inspectorate	Consultation meetings – exchange of information, documents, and mandatory measurements	During the project lifetime, following legal requirements, on as needed basis	Company Project management
Local government administration – City of Benkovac and City of Obrovac	Consultation meetings – exchange of information, documents and correspondence about the project	Continuous communication, within and outside the legal requirements ('licence to operate' to comply with the EBRD's requirement for meaningful stakeholder engagement and participation, as well as ongoing communication)	Project Manager and/or 'Stakeholder Engagement Specialist'

Croatian Civil Aviation Agency	Exchange of information on the schedule for the installation of the WTG and the final measurement coordinates	During WTG installation works and after completion of the project.	Company Project management
Croatian Forests	E-mails Formal letters, Exchange of documents and correspondence regarding the project	Prior and during the construction works.	Company Project management
Zadar County Road Authority	Consultation meetings – exchange of information, documents and correspondence regarding the project.	During preparation works for transportation and during transportation works - delivery of wind farm components.	Project Manager
Police	Consultation meetings – exchange of information, documents and correspondence about the project.	During the construction and transportation works.	Project Manager
Fire Brigade	Consultation meetings – exchange of information, documentation and correspondence regarding the project.	Continuous process - in accordance with the requirements of legislative procedures and emergency response plan.	Project Manager
Non-Governmental Organizations			
NGOs – birdlife associations local and international, local ecological NGOs	Company website and answers to direct questions or complaints.	During the project lifetime	Project Manager Environmental Specialist 'Stakeholder Engagement Specialist'
Media			
Local media	Company website Answers to media questions Regular information about the project development (press releases) Interviews	During the project lifetime	Project Manager and/or 'Stakeholder Engagement Specialist' Environmental Specialist Company Management
National media	Company website Answers to media questions Regular information about the project development (press releases) Interviews	During the project lifetime	Project Manager and/or 'Stakeholder Engagement Specialist' Environmental Specialist Company Management
International Finance Institutions	Consultation meetings as needed. Regular exchange of information, reports, documents and correspondence about the project.	Continuous process - in accordance with the loan agreement and ESAP document.	Company Management

6. RESOURCES AND RESPONSIBILITIES

The company has overall responsibility for stakeholder engagement. A person - 'Stakeholder Engagement Specialist' – has been appointed to take responsibility for implementing and updating the current SEP, communicating with stakeholders and the project team (on project schedules, technical and administrative issues), and implementing the grievance procedure. 'Stakeholder Engagement Specialist' specific responsibilities:

- Develop corporate stakeholder engagement and grievance policies and record-keeping templates,
- Maintain and regularly update a database of complaints
- Develop stakeholder engagement micro-plans for each project phase with updated stakeholder details, channels and tools, selected activities and timelines.
- Monitor and identify needs of the local community, suggest how best to meet reasonable expectations.
- Develop Community Investment Plan to successfully manage some of the local community needs, beyond direct contributions (payments to city budget/s in line with legal requirements).
- Ongoing reporting to senior management on the results of an evaluation of complaints and suggestions for follow-up activities.
- Regular updates of the SEP.
- Preparation of annual environmental and social reports on the environmental, social, health and safety performance, as well as the status of concerns and mitigation (remedy) measures taken.

Other tasks may include:

- Creating the concept and content for the website, updating the website regularly
- Management of the social media
- Preparation of the concept and content for the brochure
- Preparation of the project presentation and its updates
- Preparation of the Q&A list and its updates
- Ongoing media relations and monitoring

7. HOW TO MANAGE GRIEVANCES?

According to [EBRD Guidance Note on Grievance Management \(2012\)](#) "the client will need to be aware of and respond to stakeholders' concerns related to the project in a timely manner. For this purpose, the client will establish a grievance mechanism, process, or procedure to receive and facilitate resolution of stakeholders' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and potential adverse impacts of the project. "

If effectively implemented and continuously improved, the grievance mechanism is an alternative to external dispute resolution. However, if a stakeholder is not satisfied with the way his complaint is handled, he can always complain to the authorities and/or initiate proceedings before the judiciary. As outlined in the Guidelines, experience shows that a significant number of complaints are based on misunderstandings and that such complaints can be avoided or minimised through consistent engagement with workers and communities. "Engagement also helps to prevent community or worker concerns from escalating into grievances."

7.1. Practical application of grievance procedure – step by step

Steps in the procedure adopted for the purpose of the Wind Farm ZD2P and ZD3P project:

Step	Activities
Step 1	Verbal or written complaints and/or concerns are registered in the Complaint Form (accessible on the Company's website and/or in the local community for residents who do not have access to the internet - available in local community and/or at the site – grievance boxes). An example of a complaint form (updated for the purpose of the project) can be found in the chapter 7.2 of this SEP. An example of the EBRD recommended database can be found in the chapter 7.3 to this SEP.
Step 2	Stakeholder Engagement Specialist will formally acknowledge receipt of the complaint within 24 hours, but no later than 36 hours. If the complaint is received by mail or in a council post box, acknowledgement of receipt will be sent by mail or post. If the complaint has been received verbally, by telephone or in conversation, contact details will be requested and acknowledgment of receipt will be sent by the preferred means of communication. If a complaint (concern) is not properly understood, additional information and/or clarification will be requested. This procedure should be as simple and as quick as possible, as it helps to build trusting relationship.
Step 3	Stakeholder Engagement Specialist will evaluate and prioritize complaints (concerns) and bring serious complaints (concerns) to the attention of management immediately. However, all complaints must be adequately addressed, investigated and responded to within a period of no more than 30 days, preferably much sooner.
Step 4	Stakeholder Engagement Specialist will regularly (quarterly or bi-annually) evaluate complaints received and follow-up actions (lessons learned), and annually propose points for improvement.

7.2. Grievance complaint form sample for WF ZD2P and ZD3P

The form has been updated for the purpose of the Wind Farm ZD2P and ZD3P project. The example of the Grievance form is given in Annex 8.2.

Website

First name

Last name

E-mail address

Telephone

- I consent that my personal data given in this form are used for the purpose of submitting and processing my grievance¹⁰
- I want to remain anonymous

Description of incident / concern / problem

What happened?

When has it happened?

Where has it happened?

Who did it happen to?

Was there any immediate damage?

Could it lead to serious impact on people and nature?

What are/could be possible consequences?

What would you like to see happen to resolve concern / problem?

Printed form

First name

Last name

E-mail address

Telephone

- I consent that my personal data given in this form are used for the purpose of submitting and processing my grievance¹¹
- I want to remain anonymous

Description of incident / concern / problem

What happened?

When has it happened?

Where has it happened?

Who did it happen to?

¹⁰ In line with the GDPR requirements

¹¹ In line with the GDPR requirements

8. APPENDIX

8.1. Stakeholders' contacts

Grid operator	
Transmission System Operator	Hrvatski operator prijenosnog sustava d.o.o. Kupska 4, 10000 Zagreb Tel.: +385 1 45 45 111 www.hops.hr
PPA counterparty and electricity market	
Axpo soultions AG	Axpo Holding AG Parkstrasse 23, 5401 Baden, Schweiz Tel.: +41 56 200 41 10 www.axpo.com
Croatian energy market operator	Hrvatski operator tržišta energije d.o.o. Ulica grada Vukovara 284, 10000 Zagreb Tel.: +385 1 63 06 700 www.hrote.hr
Administrative Stakeholders	
Ministry of Physical Planning, Construction and State Assets	Ministarstvo prostornoga uređenja, graditeljstva i državne imovine Ulica Republike Austrije 20 10000 Zagreb Tel.: +385 1 3782 444 https://mpgi.gov.hr/en
Croatian Energy Regulatory Agency	Hrvatska energetska regulatorna agencija Ulica grada Vukovara 14 10000 Zagreb Tel.: +385 1 6323 777 https://hera.hr
Ministry Of Economy and Sustainable Development	Ministarstvo gospodarstva i održivog razvoja Radnička cesta 80, 10000 Zagreb Tel.: +385 1 3717 111 https://mingor.gov.hr
Ministry Of Agriculture	Ministarstvo poljoprivrede Ulica grada Vukovara 78 10000 Zagreb Tel.: +385 1 6106 111 https://poljoprivreda.gov.hr/
Republic of Croatia State Inspectorate	Državni inspektorat Republike Hrvatske Šubićeva 29 10000 Zagreb Tel.: +385 1 2375 100 https://dirh.gov.hr/
Local governing administration	Grad Obrovac Trg dr. Franje Tuđmana 1, 23450 Obrovac Tel.: +385 23 689 056 https://www.obrovac.hr Grad Benkovac

	Šetalište kneza Branimira 12. 23420 Benkovac Tel.: +385 23 684 880 https://www.benkovac.hr
Croatian Civil Aviation Agency	Hrvatska agencija za civilno zrakoplovstvo Ulica grada Vukovara 284 10 000 Zagreb Tel.: +385 1 2369 300 https://www.ccaa.hr/
Croatian Forests	Hrvatske šume d.o.o. Ulica kneza Branimira 1 23000 Zadar Tel.: +385 23 250 509 https://www.hrsume.hr/
County road authority of Zadar County	Županijska uprava za ceste Zadarske županije Zrinsko Frankopanska 10/2 10000 Zagreb Tel.: +385 1 4804 111 https://www.zuc-zadar.hr/
Police	Police stations of Zadar County and the local level.
Fire brigades	Fire stations at the Zadar County and local levels.
Non-Governmental Organizations	
NGOs – birdlife associations local and international	Udruga BIOM Čazmanska 2, 10000 Zagreb Tel:01/5515-324 https://www.biom.hr/
Local ecological NGOs	EKO-Zadar Udruga Pčelara Vrisak Planinarsko društvo Belveder Ekološka udruga Zrmanja Zavičajni klub Janko Mltrović
Organizational stakeholders	
Construction companies Equipment suppliers Transport companies	Construction works, equipment supply and transport services will be conducted by reputable companies, experienced in this kind of assignments selected on the basis of tender procurements. WTGs will be supplied by Nordex. Substation HV and MV switching equipment will be supplied by ABB. Main power transformer will be supplied by Končar D&ST. Delivery of equipment will be arranged by reputable transport companies.
Lenders	
International Finance Institutions	EBRD European Bank for Reconstruction and Development (EBRD) www.ebrd.com

8.2. Grievance sample form

SAMPLE GRIEVANCE FORM

Reference No: _____	
Full Name	First name: _____
	Last Name: _____
<input type="checkbox"/> I consent that my personal data given in this form are used for the purpose of submitting and processing my grievance ¹	
<input type="checkbox"/> I want to remain anonymous	
Contact information Please specify your preferred contact option	Telephone: _____
	Address: _____
	E-mail: _____
Description of incident / concern / problem What happened? When did it happen? Where did it happen? Who did it happen to? Was there any immediate damage? Could it lead to serious impact on people and nature? What are/could be possible consequences?	
What would you like to see happen to resolve concern / problem?	

Date: _____

Signature: _____

Please return this form to:
Company: _____, Address: _____
e-mail: _____

¹ In line with the GDPR requirements