

PROJECT GRACE - SULMIERZYCE

# ESDD - Non-Technical Summary

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# 1 NON-TECHNICAL SUMMARY

## 1.1 Introduction

OX2 is developing the Grace wind farm portfolio consisting of the two wind farms Grajewo and Sulmierzyce, located in Poland. This non-technical summary summarizes the Sulmierzyce wind farm and provides information related to development, construction and operation that is important from an environmental and social point of view.

The wind farm will comply with Polish and EU requirements and is expected to comply with the EBRD PRs.

## 1.2 General presentation

DIF Infra 6 Participations B.V. (the “Investor”) has invested in the Grace portfolio, consisting of two wind farms, Grajewo and Sulmierzyce, located in Poland. The wind farms are acquired by OX2 who has entered into a turn-key EPC contract with the respective Project Companies to design and construct the wind farms. In this setup OX2 is responsible for managing the construction process with the Turbine Supplier and the BoP contractors. OX2 holds extensive experience in development and construction management of wind farms in Northern Europe, particularly in Sweden and Finland, with the Grace portfolio being OX2’s second and third wind farm developments in Poland.

The environmental policy declaration of OX2, signed by CEO, contains the ambition to be transparent and to practice a holistic approach and self-evaluation. OX2 aims to implement this policy in all activities, by working with a certified environmental management system in accordance with ISO 14001 and by implementing a regular communication policy, with goals and initiatives in environmental work to OX2’s stakeholders.

OX2 will manage EHS aspects of the project through their corporate Environmental Management Systems and assigned EHS responsibilities at corporate level.

The two wind farms are located in different parts of the country: Grajewo in northeastern and Sulmierzyce in central Poland – see Figure 1-1.

For Sulmierzyce, 7 Vestas V126 3.45 MW turbines with a hub height of 137 m will be installed, however operated in 3.3 MW mode. In addition, roads, crane pads and cable connections will be constructed. The total capacity is 23.1 MW for Sulmierzyce.

The wind farm is fully compliant with the Equator Principles, save for principle 8.



**Figure 1-1 Map showing the locations of the two wind farms in the Grace portfolio**

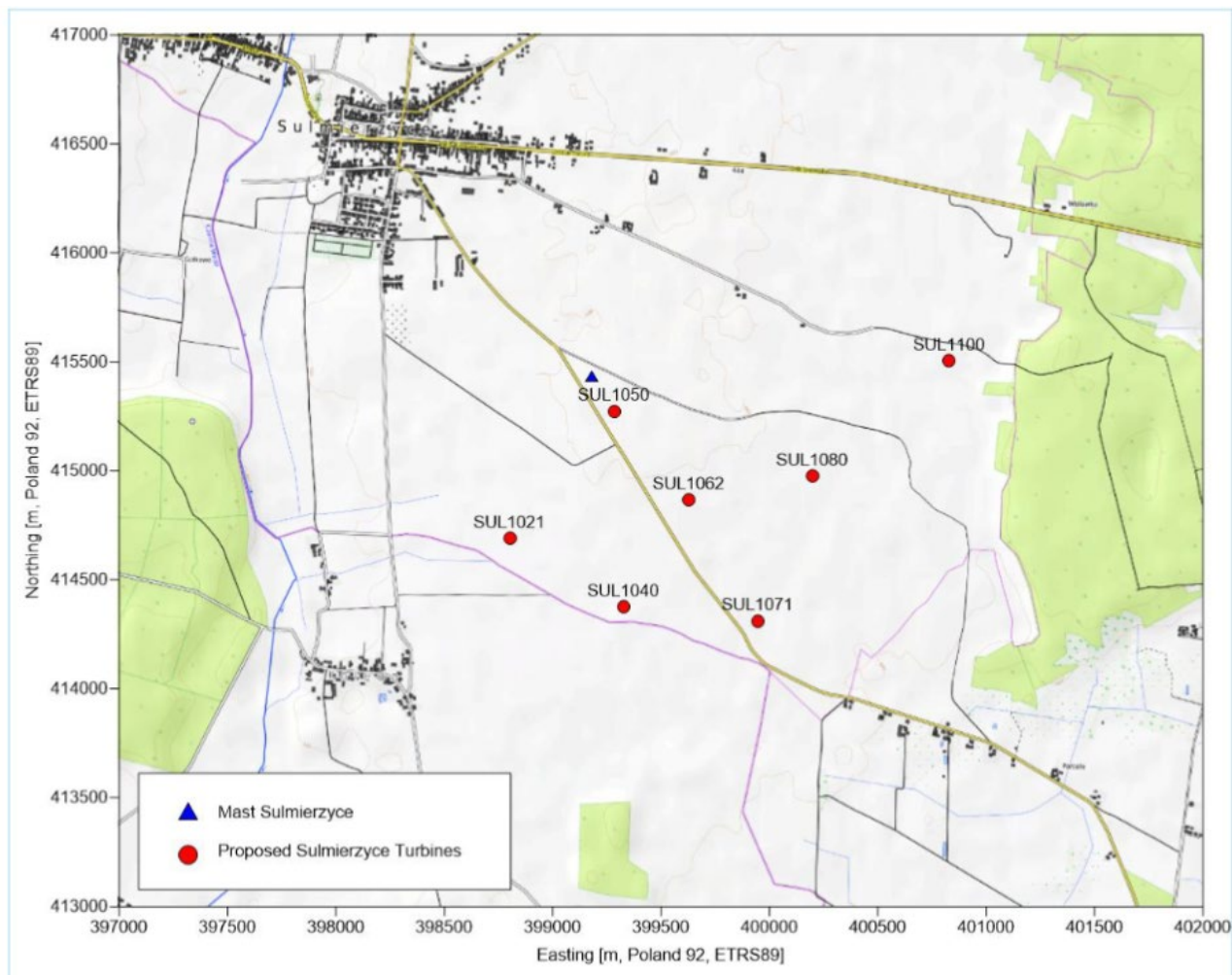
### 1.3 Wind turbine description

A wind turbine typically consists of three blades around a rotor hub, connected to the main shaft which is spinning the generator to generate electricity by converting the wind's kinetic energy into electrical energy which can be fed into the grid. For the Grace portfolio, the turbines have a design lifetime of 20 years and a tip-height of 200 m. The turbine manufacturer, Vestas, is well established in the wind industry and is expected to have the required competence and capacity to supply and maintain turbines in Poland.

### 1.4 Wind farm location

The Sulmierzyce wind farm is located in central Poland in the Voivodship of Wielkopolskie, Sulmierzyce Municipality, and will consist of 7 turbines, anticipated to start between March and September 2021 as per CATA and expected to be completed by September 2022. The surrounding area is fairly flat and mainly used for agriculture. Five operational turbines are located to the east of the Sulmierzyce site, at distances between 4 km and 7 km. Figure 1-2 below shows the wind farm layout.

The closest nationally protected area (largely overlapping with a Natura 2000 area) is located 300 m from the Sulmierzyce project area.



**Figure 1-2 Sulmierzyce layout**



## 1.5 Project Background Sulmierzyce

Over the course of the planning and design phase of the Project, the scope has altered. Originally, 10 turbines were planned of 3.3 MW each. As of such, the environmental and social impacts which were reviewed in 2014 under national EIA, were assessed for 10 turbines. These 10 turbines were permitted in terms of the environment, by the Environmental Decision of 2015. The Environmental Decision is valid until decommissioning has finished. The maximum hub height of EW1 and EW2 can be 125m, as stated in the permit. Both turbines EW1 and EW2 are excluded from the Project. Regarding the construction permits, 9 turbines are permitted (EW1-8 and EW10). Therefore, EW 10 is excluded from the Project. Currently, the scope is 7 V126 3.45 MW turbines, which are operating in the 3.3 mode.

As the scope has changed from 10 turbines to 7 turbines, the assessed environmental and social impacts in 2014 are deemed to be lower. In June 2021, the ecological consultancy Ambiens has conducted an additional ecological survey to check if the conclusions from the EIA are still valid, any changes in terms of biodiversity and protected areas have taken place, and whether the Project complies with national legislation, EU legislation and EBRD Performance Requirement 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources. The assessment has confirmed that the Project has been structured to be compliant with national and EU legislation and EBRD Performance Requirements and IFC Performance Standards. Detailed compliance assessment is presented below.

## 1.6 Rationale for this Project

Poland has, as many European countries, adopted national goals to reduce greenhouse gas emissions as part of the European Climate Change Programme established by the European Commission. Furthermore, the Polish government approved the Energy Policy of Poland until 2030 (EPP) in 2009, which outlines the direction for Poland's future energy supply. Decreasing greenhouse gas emissions and increasing renewable energy generation are key goals both on a national and on an EU level.

Compared to conventional power plants based on fossil fuels, a wind power plant causes low greenhouse gas emissions throughout its lifecycle. The P50 annual electricity generation as per the Energy Production Assessment is 68.9 GWh for Sulmierzyce.

The Project has valid environmental and construction permits, and the Project is included in the local development plan.

## 1.7 Legislative context, permits and public consultations

For Sulmierzyce, the environmental permit for the Project has been obtained and has become legal on 22.07.2015. The environmental permit includes the construction of the originally planned ten WTGs, of which seven are planned for construction, with a maximum capacity of 3.3MW per turbine. The remaining turbines can have a maximum hub height of 141 meters. The WTGs are planned to have a hub height of 137 meters which falls within the scope of the environmental permit. The building permits have been finalized and made irrevocable.

The permit and permission authorization process complies with the Polish national requirements and EU Directives on the sharing of information about the environment and its protection. The process included stakeholder engagement, both in the EIA process as well as during the construction permit application. A Stakeholder Engagement Plan is currently in development and is expected to keep track of community meetings. The permit specifies that impacted communities neither object to the Project, nor proposed any restrictions or conditions for the Project.

The environmental and construction permits clearly outline conditions addressing all required ongoing EHS management requirements. The Project has an Environmental Action Plan in place, containing requirements and commitments – including mitigating measures - with regards to road networks and foundations, as specified in the respective permits and permissions. In accordance with the Polish Environmental Protection Act of 3 October 2008, the Project has a Control Programme in place to regulate the operation of the wind farm.

### 1.7.1 EIA procedure

An Environmental Impact Assessment (EIA) was submitted as part of the Environmental Permit. The EIA consists of four sections: the introduction, option investigation, the assessment of the environmental impact, and the testing and consultation permission. The introduction describes inter alia the nature of the Project (technical and electrical), the wind resources in the area, the plans and goals, and other wind power projects in the area. Part 2 discusses the location of the project, and potential alternative options. Part 3 reasonably covers the following: noise, shadow and light, use of chemicals, security, visual impact, outdoor life and tourism, cultural and natural environment, birds, bats and other fauna, energy, air and climate, hunting, general land use, hunting, roads, transport, and materials, and liquidation.

The EIA procedure for the wind farms complies with Art. 72, section 1 of the Act of 3 October 2008 on the provision of information on the environment and its protection, public participation of society and on environmental impact assessments (Journal of Law 2003, item 1235). The preparation of the EIA is part of the obligations of the environmental permit. The permit states the Project does not need to reassess the EIA and is thus deemed sufficient.

Regarding compliance of the EIA process with the applicable standards, the project follows Polish regulations on EIA standards that there are no gaps between the local/Polish environmental law and the OECD common approaches/applicable standards.

### 1.7.2 Environmental and Social Due Diligence

An independent ESDD was undertaken in 2021 as required by project financiers EBRD and EKF, which confirmed that each of the wind farms is compliant with national legislation and appropriate EIA process was undertaken in compliance with the EU EIA Directive, Habitats and Birds Directives. The Consultant also confirmed that the project and each wind farm is designed to meet EBRD Performance Requirements and IFC Performance Standards.

The ESDD confirmed that pre-construction inventories and monitoring studies have been done thoroughly and that the methodologies used were in line with current practice. The updated Biodiversity survey undertaken in 2021 covered the following topics: vegetation, animals, protected species, birds, bats, habitats, protected areas, and cumulative impact.

## 1.8 Current condition of existing environment and socio-economic conditions

The EIA concludes the landscape of the area is fairly uniform, with limited natural or human dominance. Therefore, the turbines will be a dominating factor in the landscape. However, the impact of the wind farm on the surrounding landscape decreases with decreasing distance from the respective wind farms.

The Sulmierzyce project site is located in the proximity of a number of protected sites: Dabrowy Krotoszynskie (PLB300007) SPA and Uroczyska Plyty Krotoszynskiej (PLH300002) SAC (Special Area of Conservation) are located approximately 300 meters from the Project area, Ostoja nad Barzyca (PLH20041) SAC is located approximately 1.5 kilometres from the Project area, and Barycz Valley (PLB020001) SPA is 2.5 kilometres away. The Natura 2000 areas have been set up for the procreation of bird species and grassland, meadow and riparian habitats. The ESDD undertook a detailed review of the available document and the status of protection of the Natura 2000 areas and concluded that the wind farm will not have a material impact on the integrity of the N2000 areas and their conservation objectives. With respect to birds, the ESDD confirmed that there are no permanent habitats or breeding grounds for key bird species in the Project area. There were no regular high concentrations of migrating birds and no foraging or roosting concentrations. Low concentrations of stationary, migratory and hunting birds of prey were observed during the field studies, however these are only found periodically and short-term.

The EIA and the supplementary biodiversity assessment from 2021 concludes that the Project is not expected to cause any significant negative consequences regarding key bird species or the integrity and the conservation objectives of Natura 2000 sites.

Concerning bats, there is low activity in the wind farm area. The species found were common for this part of Poland and the number of animals found were few. Additionally, a complete lack of breeding grounds for bats was found. Most of the recorded bats are numerous in the country.

A different study considered reptiles and mammals in the wind farm area. There are a few reptile species and several mammals found in the wind farm area. The expected impact of the construction phase and operation phase of the Project on these animals is expected to be low. As the found species are common in Poland.

No protected habitats were identified within project site.

Biodiversity monitoring requirements are identified regarding birds and bats during the operation of the wind farm and are described in Section 1.10.4, which are included in the Environmental and Social Action Plan (ESAP) and structure the project in line with national and EU EIA Directive, Habitats and Birds Directives and EBRD PRs. The ESDD has confirmed that the Project presents a low risk when the monitoring requirements and mitigation requirements as set in the environmental decision are followed.

According to the EIA, the construction of the wind farm will bring a new form of land use. The Project area consists of agricultural land (see Figure 1-3).



**Figure 1-3 Landscape as it occurs in the Sulmierzyce Project area**

The description of the Project complies to the local spatial plans. During construction, the agricultural land use in the Project area is minimized. After construction, the agricultural function can be practiced as before. The EIA concludes that sufficient measures (e.g. distance between the turbines and residential buildings) were taken to ensure no significant adverse effects on local residents. DNV is of the opinion the mitigated measures are sufficient and deems the risk to be low. All land leases are in place, which also include restrictions on certain future developments by landowners (e.g. construction of residential buildings). The project has been designed to minimise the use of agricultural land and after construction, areas not required for operation will be returned to agricultural use.

The ESDD has concluded there are several cultural heritage objects in the vicinity of the Project area, the most important of which is the church in Sulmierzyce. The Project is not expected to have a negative impact on the cultural heritage objects as the Project area is located more than 1 km away. The area North-West of the Project area is considered a zone where archaeological objects can be found. The permits consider several mitigation actions when archaeological findings are done during construction work. This will include consultation and agreement with the appropriate authorities on the further actions required. DNV is of the opinion the overall risk for cultural heritage is low. Nevertheless, if, during the implementation of the Project, an unrecorded archaeological site is found, it will be necessary to conduct archaeological research.



## 1.9 Impact during construction

### 1.9.1 Biodiversity

Potential construction impacts on biodiversity will be short term and will be minimised through adoption of good construction management practices. In addition, specific requirements stipulated in the Environmental permit and ESAP will be followed. These include:

- Carry out the construction works with respect to the existing vegetation, keep destruction of the local environment to a minimum
- During earthworks, secure the excavations and regularly inspect them for the presence of small mammals, amphibians or reptiles. If they are found, move them to a remote, safe place appropriate for given species

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

### 1.9.2 Dust

Dust emissions will take place mostly during the construction and decommissioning phase resulting from machinery and devices used for earthworks, vehicles operating on the construction site and means of transport. The EIA considers the amount of dust emissions and their range as insignificant to the environment. Additionally, the dust emissions will be short-term. It is expected there will be no exceedance of environmental quality standards.

### 1.9.3 Soil

During the construction phase, contamination of the soil can occur in several ways, mainly by accidental leakage of harmful substances (e.g. oil, grease) from construction machinery, transport, and the on-site sewage.

No permanent changes in the soil and land use will occur. After the construction of the WTG foundations and underground MV cables, the soil will be brought back to its original function (agriculture). Regarding the construction of roads, they will be constructed made from natural materials (natural aggregate or mixture of soil, concrete and lime). DNV has assessed the company HSE policy (HSE Minimum Requirements 02.10.2019) and confirms that the plan complies with the Applicable Standards and can be used to mitigate any pollution impacts. Nevertheless, periodic inspections are advised to ensure compliance during the course of the Project.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

### 1.9.4 Water

While there are no sensitive water receptors within the Project area, contamination of the surface water and groundwater may potentially occur during construction in several ways, mainly by accidental leakage of harmful substances (e.g. oil, grease) from construction machinery, transport, and the on-site sewage.

The groundwater can be temporarily affected during the construction phase as the excavation site might be drained for the construction of the turbine foundations. However, the effect will be reversible when construction is finished, as the site will be brought back to its original state and the water level will stabilize.

Additionally, risks are appropriately mitigated as a result of the organization of the Project area, the small scale of the possible accidents and the immediate notification of relevant services in case of an accident to remove and limit the possibility of pollution to spread. Nevertheless, DNV advises periodic inspections to ensure compliance during the course of the Project.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

### 1.9.5 Waste

Waste generation during construction, operation and decommissioning will occur. The possible types of waste have been mapped in the EIA. Possibilities to reuse/recycle the waste in the Project area, e.g. for backfilling foundations and restoring the agricultural function of the area are considered.

The remaining waste will be transported to a waste landfill or recycling facility. The waste will be temporarily stored on-site, separated and stored in appropriate containers. Hazardous waste will be separated and stored in sealed containers, after which the hazardous waste is transferred to appropriate authorized waste management organizations. The sewage will be collected in non-drain reservoirs and then transferred to an appropriate authorized waste management organization.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

### 1.9.6 Construction noise

During the construction phase, noise as a result of machinery, transport, and drilling will be caused. The residents are located at least 500 meters from the Project area. Nevertheless, the noise levels on the border of the Project area will exceed 45 dB. Despite the exceedance of the permitted noise levels, it should be considered that the noise value is safe for people and will not cause health damage. Additionally, the nuisance will be short-term and will stop when construction work is completed. According to the EIA, construction will have a temporary negative impact on the acoustic climate of the area, which is not considered a significant impact. Possible mitigation measures are proposed such as: construction work will take place during the daytime to limit nuisance in the area. An exception is made for concrete work as this should be a continuous process.

DNV confirmed the risk of impact of construction noise to be low as it is temporary of nature. Additionally, the construction permit allows the temporary exceedance of noise levels.

### 1.9.7 Construction traffic and transport

Delivery of construction materials and equipment will require the use of the national and local roads to access the Project area. This may include large and over-size vehicles such as to deliver parts of the turbines. A Traffic and Transport management plan will be developed and implemented to manage the project related traffic and potential health and safety risk and disturbance impacts. This will include access routes, diversions, exceptional loads, signage, driver training and consultation with local authorities and sensitive residents or receptors close to access routes (e.g. schools) Road permits will be secured in advance for all necessary activities.

### 1.9.8 Construction Health Safety and Labour

The construction contractor will be required to implement national and Lenders requirements related to the management of health and safety and labour and working conditions. Construction workforce can be exposed to a number of potential health and safety risks including working at height; working with electricity; heavy lifting operations. The construction contractor will be required to implement a Construction Health and Safety Management Plan which will be monitored by OX2. A draft grievance report is in place which gives the opportunity to all personnel in OX2 projects to report their grievances anonymously or signed. The mailbox will be installed outside the construction site and will be checked regularly. The topics will be addressed during the construction meetings.

## 1.10 Impact during operation

### 1.10.1 Social impact

In addition to visual impact, ice-throw and noise (discussed in section 1.10.6), wind turbines may cause shadow flicker. The EIA concludes that the expected shadow flicker effect is limited, since there are only few hours of shadow flicker per year (maximum 25 hours) during which the shade of the turbines will fall on residential buildings. The expected turbines to cause the most expected shadow (more than 8h/y) are WTGs 3, 4, 5, 7, 8 and 10. WTG6 is not expected to cause more than 8h/y shadow.

The ESDD has confirmed that the risk of shadow flicker is low but that consultation with potentially affected buildings is undertaken during operation, to understand actual impacts and a community grievance mechanism is established where people can raise concerns. In case of impacts occurring, mitigations can be implemented which may include a flicker control system for wind turbines is to reduce the amount of flicker in the areas.

### 1.10.2 Waste

During the maintenance of the wind farm, waste in small amounts will be generated in terms of e.g. oils and filters. These types of waste will not be stored on-site. The waste will be transferred to a specialized organization authorized to collect waste. Moreover, pollution of the soil can occur during the maintenance of the wind farm (e.g. leakage of lubricants or oils) or in the event of a breakdown.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential operational impacts and will perform regular monitoring of the project in line with environmental permits conditions.

### 1.10.3 Contamination

The EIA states the risks for contamination are minor as the construction site is expected to be appropriately organized. Additionally, in case of an accident during the construction or operation phase, the risk is considered to be low as the scale of the accident is small and will not cause a significant negative impact on the environment. Appropriate services will be notified immediately in the event of an accident and measures will be taken to remove and limit the possibility of the pollution to spread. The ESDD confirmed there is low risk of contamination for the project.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential operational impacts and will perform regular monitoring of the project in line with environmental permits conditions.

### 1.10.4 Birds and bats

In the case that a high bird and bat mortality is confirmed (compared to other projects in Poland and in Europe), mitigating measures (monitoring studies) should be considered to reduce the risk of mortality. A low probability of high mortality rates for the respective wind farms is however expected. The bird monitoring report concludes the impact of the wind farm on protected bird species will be negligible or not occur. Additionally, low or moderate activity regarding bats has been monitored. Moreover, the 2021 ecological survey confirms the findings of no significant negative expected impact for both species. To avoid the increase of bat activity, no water reservoirs should be built in the Project area, as stated in the conditions for the environmental permit. The wind farm does not have a transboundary impact.

Moreover, the 2021 ecological survey confirms the findings of no significant negative expected impact for both species. DNV deems the risk to be low.

ESDD confirmed operational risks to birds and bats to be low. However, monitoring and mitigation requirements stipulated in the Environmental Permit and ESAP should be followed. These include specifically for biodiversity:

Conditions stipulated in the Environmental Decision regarding bird and bat monitoring:

Carry out a post-implementation monitoring including the annual cycle, which should be repeated three times within 5 years after the wind farm is in operation.

The monitoring report should include; bird occurring in the area covered by the potential impact during the Icgowy period – the subject of operation should be primarily the species included in Annex 1 of Council Directive 2009/147/EC and on the list of the Red List of Endangered and Endangered animals in Poland and Europe, as well as included in the Polish list of the Red book animals, mid-range species, few, very sparse, and extremely sparse – migrating bird and bat mortality along with the assessment of the effectiveness of finding and the speed of their disappearance from the area.

The accumulated results should be interpreted when assessing the impact of investments on populations of bats and birds and possibly propose appropriate rescue or minimization measures. The results of the ornithological and chiropterological monitoring along with the interpretation and impact assessment as well as the proposed mitigation measures should be presented within 2 months from the end of each of the annual monitoring cycles, and the final report within two months from the end of monitoring.

### 1.10.5 Electromagnetic fields

Due to the location of the wind turbine, with a hub-height of 137 m above ground level, the generated electromagnetic field will have a negligible impact at ground level.

### 1.10.6 Noise

A noise assessment has been done to model the expected noise caused by the wind farm and was based on the same turbine model that is to be utilized. The noise assessment results however show that there is 1.3 dB(A) margin to the maximal permitted noise level and that the sound power level used in the model is higher than the level for the selected turbine, and thus, the associated risk of noise exceedance can be considered as low. DNV is of the opinion the noise levels are expected to be below the prescribed noise levels of the Applicable Standards. No curtailment measures are expected.

For Sulmierzyce, no cumulative noise was considered from neighbouring wind farms as the wind farms are located at a significant distance (more than 500m) from the Project area. As DNV is not aware of any new potential wind farms which might be in the vicinity of the Project, DNV is of the opinion an updated cumulative noise assessment should be conducted.

The ESDD findings will be confirmed via noise monitoring at operational stage, which is covenanted in the ESAP.

### 1.10.7 Ice-throw

Ice may form on the blades of the WTGs, which can fall off during operation. This is a safety concern regarding the neighbouring community. The EIA states that adequate preventative measures have been taken as the WTGs are located at least 500 m from the nearest residential buildings. Additionally, warning signs will be placed on-site. Relevant information will be provided to the local communities. The ESDD has confirmed that projects risk for ice throw is low.

## 1.11 Post-construction monitoring and measures to limit the impact

The respective permits provide that no later than two months after operations have commenced the noise levels should be monitored. If the acoustic levels are exceeded, mitigating measures should be taken to lower the noise levels to the allowed threshold. Monitoring for potential shadow flicker impacts is not required by national law. However, mitigation measures are advised such as adequate stakeholder management and a flicker control system in case of complaints from the surrounding community.

For Sulmierzyce, the environmental permit requires the carrying out of a detailed post-construction monitoring cycle regarding bats and birds, which should be repeated three times within five years after the farm is taken into operation. The results should be assessed, and if it is determined that the impact on birds and bats is too large, mitigating measures should be taken which can include an application of shut down on demand protocol.

The measures are taken up in the ESAP. OX2 will also report to environmental authorities in line with requirements stipulated in the permit.

## **1.12 Grievance procedure**

OX2 will implement a grievance mechanism to manage grievances submitted by the Project stakeholders. The grievance mechanism is a management tool, for the designation of responsibilities to handle and process grievances, the claimant's contact information (name, address, phone number, email address), when grievances can be expected to be responded to (e.g. within 14 days), where they will be logged and what the due process is. The process of the mechanism shall be clearly communicated to the stakeholders. This can be done during the stakeholder meetings and on the company's website. The grievance mechanism shall include a public grievance form. The grievance mechanism will be accessible through letter, telephone or internet or directly at the Project site during construction works and be able to receive anonymous grievances and those where the complainant wishes to remain confidential. All grievances will be registered in a community grievance log. OX2 will instruct the local authorities in the commune offices about the grievance mechanism and provide them with the contact details to which grievances can be submitted.

The permit and permission authorization processes comply with the Polish General Directorate on the sharing of information about the environment and its protection. The process during the permit application included a grievance mechanism. The Project has a Community Grievance Log in place to keep track of complaints.

A draft grievance report is in place which gives the opportunity to all personnel in OX2 projects to report their grievances anonymously or signed. The mailbox will be installed outside the construction site and will be checked regularly. The topics will be addressed during the construction meetings.

## **1.13 Environmental and Social Management System**

The HSE documentation for Sulmierzyce is extensive. Monthly reports are available, which include HSE incidents, inspections and relations with local communities and third parties. Several plans are available such as an emergency response plan, environmental plan, HSE plan and a risk and opportunity list. The HSE plan includes detailed information on the Project, signage, expected risks during the construction phase, dangerous works, emergency procedure, personal protective equipment, supervision, dangerous substances, safety instructions, chemicals, security, guest access, HSE checks, inspections and more. The roles and responsibilities are clearly defined in the Project Execution Plan (PEP), in terms of external organisation, internal organisation, including names and contact information. The ESDD has confirmed that OX2 has relevant capacity to undertake the Project in line with EBRD Performance Requirements.

A Stakeholder Engagement Plan is under development by OX2. The purpose of the SEP is to ensure timely and effective sharing of information and communication with stakeholders related to the Project. The SEP is expected to include an identification of stakeholders including those affected by and those with an interest in the Project and defines the SEP for the Project. This includes the information that will be disclosed, its format and timing and consultation activities which will be undertaken during the Project. It is also expected to include a description of the grievance mechanism.



## 1.14 Environmental Social Action Plan

The ESAP has been developed to address risks related to construction stage impacts and operation stage impacts, including environmental permit requirements, building permit requirements and recommendations from the ESDD with specific actions including:

- Develop noise monitoring plan and undertake a programme of post-construction noise measurements
- Implement environmental protection measures during construction including:
  - During earthworks, secure the excavations and regularly inspect them for the presence of small mammals, amphibians or reptiles. If they are found, move them to a remote, safe, place appropriate for given species.
  - Carry out the construction works with respect to the existing vegetation, keep destruction of the local environment to a minimum (e.g. destroying grasses or small vegetation in case of widening temporary roads, or during transportation of the wind turbines, etc.)
- Post-construction biodiversity (bird and bat) monitoring including:
  - Carry out a post-implementation monitoring including the annual cycle, which should be repeated three times within 5 years after the wind farm is in operation.
  - The monitoring report should include; bird occurring in the area covered by the potential impact during the Icgowy period – the subject of operation should be primarily the species included in Annex 1 of Council Directive 2009/147/EC and on the list of the Red List of Endangered and Endangered animals in Poland and Europe, as well as included in the Polish list of the Red book animals , mid-range species, few, very sparse, and extremely sparse – migrating bird an bat mortality along with the assessment of the effectiveness of finding and the speed of their disappearance from the area.
  - The accumulated results should be interpreted when assessing the impact of investments on populations of bats and birds and possibly propose appropriate rescue or minimization measures. The results of the ornithological and chiropterological monitoring along with the interpretation and impact assessment as well as the proposed mitigation measures should be presented within 2 months from the end of each of the annual monitoring cycles, and the final report within two months from the end of monitoring.
- Implementation of the Stakeholder Engagement Plan and grievance mechanism including stakeholder consultation

## 1.15 Further information

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## About DNV

DNV is the independent expert in risk management and assurance, operating in more than 100 countries. Through its broad experience and deep expertise DNV advances safety and sustainable performance, sets industry benchmarks, and inspires and invents solutions.

Whether assessing a new ship design, optimizing the performance of a wind farm, analyzing sensor data from a gas pipeline or certifying a food company's supply chain, DNV enables its customers and their stakeholders to make critical decisions with confidence.

Driven by its purpose, to safeguard life, property, and the environment, DNV helps tackle the challenges and global transformations facing its customers and the world today and is a trusted voice for many of the world's most successful and forward-thinking companies.