



Stakeholder Engagement Plan

for Developer Alibunar Windfarm A d.o.o.

for the

Alibunar A Wind Project

in the Alibunar Municipality,

Autonomous Province of Vojvodina,
Serbia



View from Seleuš



View from Vladimirovac

**Future Views
of Alibunar A
and B Wind
Projects**

April 2015

**Stakeholder Engagement Plan
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Abbreviations

EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIB	European Investment Bank
ESIA	Environmental and Social Impact Assessment
E&S Standard	EIB Environmental and Social Standard
NGO(s)	Non-governmental Organisation(s)
PRs	Performance Requirement(s) (of the EBRD's Environment and Social Policy 2008 (the Policy))
RS	Republic of Serbia
SEP	Stakeholder Engagement Plan
UNECE	United Nations Economic Commission for Europe

Stakeholder Engagement Plan

Alibunar A Wind Project

1 Introduction

The company WindVision Windfarm A d.o.o, a subsidiary of the Dutch company WindVision (both referred to as “WindVision” or “the Company”), intends to develop and operate a wind energy power plant near the settlements of Seleuš, Vladimirovac, and Alibunar on the territory of the municipality of Alibunar, in the south Banat region of the autonomous province of Vojvodina in Serbia.

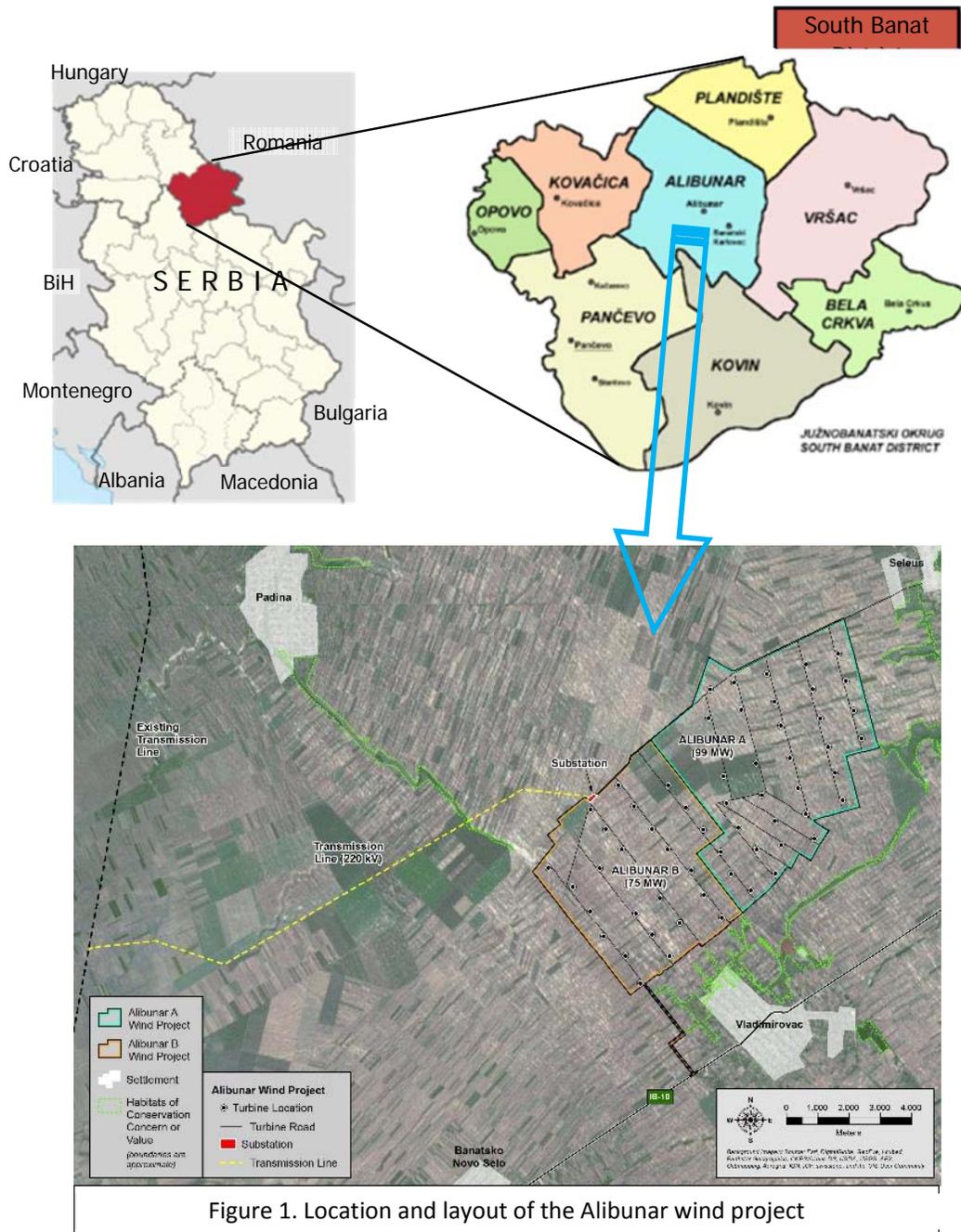
The European Bank for Reconstruction and Development (the “EBRD”) and the European Investment Bank (“EIB”) (together, “the Lenders”) are considering providing financing for this project. To meet EBRD and EIB requirements for stakeholder engagement and public consultation and disclosure, this Stakeholder Engagement Plan (“SEP”) has been developed and will be implemented by WindVision. The purpose of the SEP is to present how the Company plans to communicate with people who may be affected by or interested in the Project. It also describes a “grievance mechanism”, which is a process people may use to raise any concerns about the Project. The SEP will be periodically updated as Project information becomes available, such as important construction milestones or changes in traffic patterns.

2 The Proposed Project

The Project is in the south Banat region of northeast Serbia (Figure 1). It is located on a gently rolling loess plateau on land that is currently used to grow maize, sunflowers, and other crops. The project is being developed in two phases, Alibunar A and Alibunar B (also known as Alibunar 1 and 2). The Project will include the following, as shown on the bottom section of Figure 1:

- Improvements to about 60 kilometres of existing municipal roads to connect turbine locations, including 28 kilometres for Alibunar A, 15 kilometres for Alibunar B, and 17 kilometres of access and common roads. Improvements will involve reconstructing the roads with crushed stone to a depth of 30-40 centimetres over a width of 4 meters.
- Burying electrical cables under the roads to carry electricity from the turbines to the new substation.
- Excavating and pouring concrete to form turbine foundations about 25 meters in diameter and 5 meters deep. Foundations will be placed about 350-500 meters apart, and Alibunar A will cover a territory of about 3,000 hectares.
- Installing 33 turbines for Alibunar A and 25 more turbines for Alibunar B. Each turbine will generate up to 3 megawatts of electricity, so Alibunar A will have the capacity to generate up to 99 megawatts and Alibunar B up to 75 megawatts. The turbines will be up to about 120 metres high, with blades about 60 metres long. They will be painted a white or gray neutral colour, with a red stripe on the blades.
- Constructing a new 35kV/220kV substation and control center that will cover an area of about 1.78 hectares.
- Constructing 11.8km of 220kV overhead transmission line to carry electricity from the substation to an existing 220kV line that runs between Zrenjanin and Pančevo.

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- Equipment and materials – most importantly, the very large turbines and blades and large quantities of rock – will come via the Danube River port at Pančevo and be carried to the site in trucks.

No turbines are closer than 1,000 metres from the nearest house. The land plots where turbines will be located are owned by 49 individuals and two companies, all of whom have leased land to the Company.

Many other wind projects are proposed for the area, as shown on Figure 2. As of January 2015, only Plandiste was reported to be under construction. An Environmental and Social Impact Assessment (ESIA) to evaluate potential impacts from the entire Alibunar project was

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prepared in 2012 to meet the EBRD's requirements. Based on this ESIA, two separate Environmental Impact Assessment (EIA) reports, one for Alibunar A and one for Alibunar B, were prepared to meet Serbian legislative requirements for content of such documents. The Provincial Secretariat of Urbanism, Construction and Environment reviewed and approved the EIAs in 2014. EIAs for the substation and transmission line will be prepared later in 2015 if required by the Provincial Secretariat.

Current plans are for roads and some foundations to be constructed in 2015 and for construction to continue until the project is commissioned in 2017.

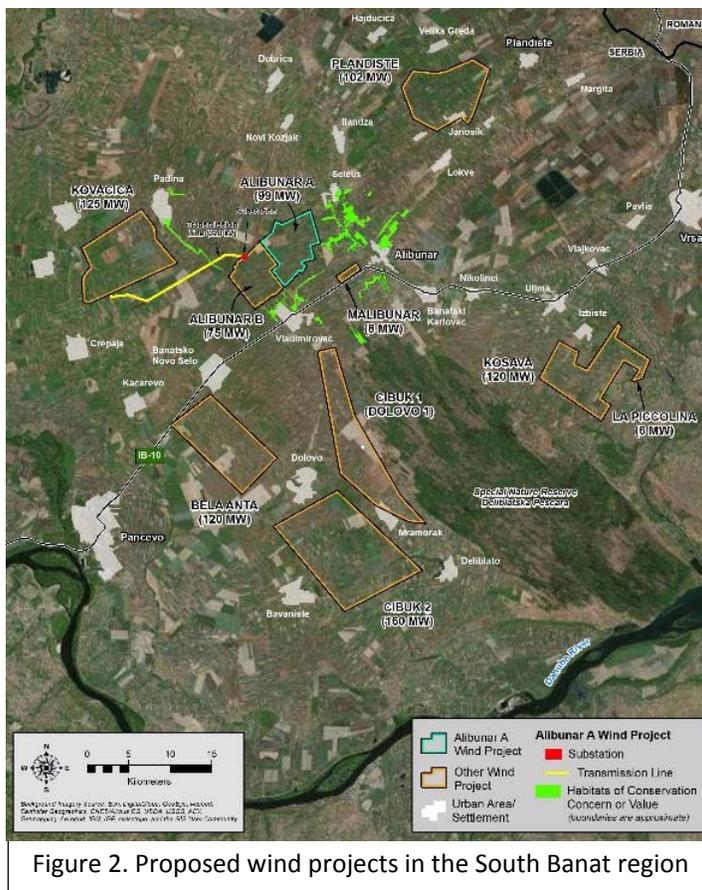


Figure 2. Proposed wind projects in the South Banat region

3 Requirements for Stakeholder Engagement

3.1 Public Participation Provisions of Serbian Legislation

Public participation in the environmental protection processes in Serbia is guided by two main laws and an international convention that Serbia has ratified:

- *Law on Planning and Construction* (Official Gazette of RS no. 72/09, 81/09, 145/14)

This law regulates the system of spatial development of Serbia and requires public review and participation throughout the process of development and adoption of planning documents, including Location Permits, Construction Permits, and Operating Permits. Public meetings were held in Alibunar in 2013 before the Provincial Secretariat issued decisions on the Location Permits for Alibunar A and Alibunar B. When WindVision applies for Construction Permits for the two windfarms and the substation, later in 2015, the Provincial Secretariat will organize public meetings for each one before reaching a decision. These meetings can only take place after EIAs have been approved. After the project is constructed, WindVision will apply for Operating Permits, and there will again be public meetings before decisions are made.

- *Law on the Environmental Impact Assessment* (Official Gazette of RS no. 135/04 and 36/09) and associated by-law documents

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This law requires an Environmental Impact Assessment to be carried out for certain types of projects, including wind projects over 50 megawatts. It also requires draft EIAs to be available for public review and for public meetings to be held to discuss draft EIAs. Public meetings on the Alibunar A and B EIAs were held in Alibunar in 2014, and meeting will be held on any other EIAs that are required.

- *Law on Strategic Environmental Assessment* (Official Gazette of RS no. 135/04 and 88/10)

This law governs preparation of strategic environmental assessments (SEAs) of certain plans or programmes that may have a significant impact on the environment. Draft SEAs must be disclosed to the public and public hearings must be held to receive comments before the SEA is adopted. This law does not apply to Alibunar since competent authorities have not required an SEA for wind development in the south Banat.

- *United Nations Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters* (“the Aarhus Convention”), which was ratified by Serbia in 2009

The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and trans-boundary environment. It is a way of enhancing environmental governance through public participation in the decision making process.

3.2 Requirements of the European Bank for Reconstruction and Development

The Project has been screened as a Category A project under the EBRD Environmental and Social Policy (2008) for the following reasons:

- The Project involves construction of a wind energy facility whose size and location make it possible to cause significant impacts on the environment – in particular on birds and bats – that require evaluation in an Environmental and Social Impact Assessment.
- The Project is one of many projects in a small area that borders the Deliblato Sands Special Nature Reserve, which supports many kinds of birds and bats that may be vulnerable to wind turbines.

The Project is also required to meet best international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in EBRD Performance Requirement 10 (Information Disclosure and Stakeholder Engagement). This Performance Requirement considers stakeholder engagement an ongoing process which involves:

- Public disclosure of appropriate information so as to enable meaningful consultation with stakeholders.
- Meaningful consultation with potentially affected parties.
- A procedure or policy by which people can make comments or complaints.

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The Performance Requirement outlines a systematic approach to stakeholder engagement that helps clients such as WindVision build and maintain over time a constructive relationship with their stakeholders, in particular the locally affected communities. This approach includes the following steps, which are covered in the next sections of the SEP:

- *Identification of project stakeholders and groups*, especially people who could be affected by construction and operation of the Alibunar project. This was done in 2012 and updated in 2015. Alibunar Project stakeholders are identified in section 4.
- *Stakeholder engagement process and information disclosure*, throughout project development and implementation. During this step, Developers ensure that identified stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation. Past consultations are summarized in section 5 and planned engagement is described in section 6.
- *Meaningful consultation*, based on the disclosure of relevant information and a consultation process that is inclusive and culturally appropriate for all stakeholders.
- *Grievance mechanism* and process which allow anyone to express their concerns or make complaints, and to be assured the concerns will be handled promptly and consistently. The Project grievance mechanism is presented in section 7.

4 Stakeholder Identification and Communication Methods

There are several categories of stakeholders. The first category includes people, institutions, and organisations that will be directly or indirectly affected by the Project, those who own land that will be used or affected by the Project, and nearby residents who live within sight or sound of the project and project traffic. It also includes people who may seek employment by the Project or to sell supplies or equipment to the Developer or contractors. The second category includes people and institutions who participate in implementation of the project: EBRD, WindVision and its employees, construction contractor(s), and equipment suppliers. The final category includes people and organizations who may influence and/or make decisions on implementation of the project. These would include national or provincial ministries and agencies, local governments and authorities, and nongovernmental organisations (“NGOs”) with interest or expertise.

Table 1 shows the various categories of stakeholders for the Alibunar Project.

Table 1. Categories of Alibunar Project Stakeholders		
<i>Stakeholders who may be affected by the Project</i>	<i>Stakeholders who participate in Project implementation</i>	<i>Stakeholders who may influence and make decisions on Project implementation</i>
<ul style="list-style-type: none"> • Residents of settlements near wind farm and associated infrastructure • Land owners (49 individuals & 2 companies) • Residents along transport routes in/near Pančevo, 	<ul style="list-style-type: none"> • WindVision • EBRD • EIB • WindVision employees • Construction contractors and employees • Equipment and material suppliers 	<ul style="list-style-type: none"> • Local self-government (LSG) • Local inspectorats and public utilities (spatial & urban planning, cadastre, communal affairs, environment, roads, etc.) • Port of Pančevo • Province Vojvodina – Competent Governmental Secretariats

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Table 1. Categories of Alibunar Project Stakeholders		
<i>Stakeholders who may be affected by the Project</i>	<i>Stakeholders who participate in Project implementation</i>	<i>Stakeholders who may influence and make decisions on Project implementation</i>
<p>Banatsko Novo Selo, Vladimirovac</p> <ul style="list-style-type: none"> • Farmers who own/use nearby land 	<ul style="list-style-type: none"> • Transport companies 	<ul style="list-style-type: none"> • Competent State Ministries of Republic of Serbia • Provincial and State Agencies/Institutes (nature protection, environment, energy, roads, culture, civil aviation, etc.) • Electricity transmission operator • NGOs – local and national level

A variety of communication methods will be used as appropriate for each set of stakeholders. In general, these include:

- Public and individual meetings
- Announcements in media
- Provision of general information on notice-boards at public locations
- Regular mail and email correspondence
- Publication of relevant project information on the Developer’s website (www.windvision.com).

5 Stakeholder Engagement to Date

WindVision has engaged stakeholders since 2011, both informally through their local representative and formally in official meetings with government institutions and consultation meetings with the public. This was particularly intense throughout the environmental and social appraisal process in the period from July 2011 to October 2012. The purpose of these activities has been to inform and hear concerns of landowners, government institutions, and the public about the project and relevant environmental and social issues.

The formal consultation process and public involvement were undertaken as part of the administrative procedure for approval of the Location Permit in 2013 and the Alibunar A and B national EIAs. In accordance with Serbian law, both processes were organized by the Provincial Secretariat for Urban Planning, Construction and Environment. For Alibunar A, two public hearings have been held to date, both in Alibunar: for the Location Permit on 13 September 2011 and for the EIA on 15 January 2014.

During the stakeholder engagement process, key stakeholders and their concerns included:

- Land owners and local population:
 - Land acquisition/leasing and compensation, loss of agricultural land
 - Nuisance due to construction activities (dust dispersion, noise and traffic)
 - Nuisance due to operational activities (noise).

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- Municipal authorities and public utilities:
 - Spatial and urban planning aspects (proposed project vis à vis existing and planned municipal spatial / urban plans)
 - Transport issues during project construction
 - Improvement of existing local roads within the project development site.
- Key Provincial authorities:
 - Provincial Secretariat for Urbanism, Building and Environmental Protection:
 - Spatial / urban and location permitting of the proposed wind farm
 - Adequacy and approval of the environmental impact assessment
 - Requirements for issuing a construction permit
 - At all stages, adequate participation/input by national, provincial, and local authorities (transport, civil aviation, telecommunications, municipality, etc.)
 - Institute for Nature Conservation of Vojvodina Province:
 - Adequacy of the biodiversity impact assessment as part of the overall EIA
 - Impacts to the fauna of birds and bats in the project area and mitigation / offset measures and operational monitoring
 - Cumulative impacts due to increasing wind farm developments in Vojvodina Province.

Public consultations will continue, as described in section 6.

6 Planned Information Disclosure and Public Consultation

WindVision intends for the Project to serve as an example of good international practice in wind project development. The means and timing of WindVision's communications with internal and external stakeholders are shown in Table 2.

General information related to the various stages of Project development will be available as follows:

- WindVision website (www.windvision.com)
- WindVision's local premises and headquarters office (see addresses below)
- Information boards in the settlements of Alibunar, Seleuš, Vladimirovac, and Banatsko Novo Selo and in offices of Alibunar and Pančevo municipalities (see addresses below).

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Table 2. Alibunar Stakeholders and Communication Methods			
<i>Stakeholders</i>	<i>Number of people</i>	<i>Type and Method of Communication</i>	<i>Timing</i>
Internal Stakeholders			
WindVision employees	15	<ul style="list-style-type: none"> - Internal newsletters, notifications, intranet - Grievance procedure - Bulletin boards 	Prior to and throughout Project construction and implementation
Contractor employees	Approx. 200	<ul style="list-style-type: none"> - Information in contract - Bulletin board - Grievance procedure 	Prior to and throughout construction.
External Stakeholders			
All	100s – 1000s	<ul style="list-style-type: none"> - WindVision website: www.WindVision.com - Materials in local town halls - Radio and newspaper announcements - Public meeting - Grievance mechanism 	<ul style="list-style-type: none"> - ESIA documents disclosed for comment on April 28, 2015 - Public meeting in Alibunar in May 2015, date to be advertised as shown in Table 4.
Landowners	49 individuals 2 companies	<ul style="list-style-type: none"> - WindVision website - Personal interactions with local representative - Materials in town halls 	<ul style="list-style-type: none"> - At disclosure of ESIA documents - Prior to major changes in ongoing construction
Residents living & working along highway IB-10 between Pančevo port and the site, and drivers on the highway	100s – 1000	Signboards on highway in residential/commercial zones and at access turnoff	Before and during major changes in truck traffic
Farmers of nearby fields	10s to 100	<ul style="list-style-type: none"> - WindVision website - Project signboard(s) on main access roads 	Throughout construction and operation before/ during major events/ developments
Residents of settlements of Alibunar municipality, including Alibunar, Vladimirovac, Seleuš and others)	1000s	<ul style="list-style-type: none"> - WindVision website - Materials in town halls 	Before major construction developments, prior to commissioning
Local authorities responsible for territories where construction will take place: Alibunar municipality and settlements	n/a	<ul style="list-style-type: none"> - Official correspondence - Meetings - Formal reports as required 	Prior to and throughout construction and operation
Emergency services, fire brigades, utility owners and operators, local police (in connection with traffic management) in Pančevo and Alibunar municipalities)	n/a	<ul style="list-style-type: none"> - Official correspondence - Meetings 	Prior to and throughout construction and operation
Provincial authorities and institutes (construction/environmental, civil aviation, traffic/ roads, telecommunications, cultural heritage	n/a	<ul style="list-style-type: none"> - Official correspondence, including formal reports as required - Meetings 	Prior to and throughout construction and operation

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<i>Stakeholders</i>	<i>Number of people</i>	<i>Type and Method of Communication</i>	<i>Timing</i>
Nongovernmental organizations: - Bird Study and Protection Society of Serbia - League for Ornithological Action of Serbia - Wind Energy Association of Serbia	n/a	Notice of public meetings and reports	- At disclosure of ESIA documents - Upon completion of periodic monitoring reports
Lenders	n/a	Formal communications	As required by ESAP

The ESIA documents -- the Alibunar A ESIA, the Alibunar A and B EIAs, a NonTechnical Summary of the ESIA, this Stakeholder Engagement Plan, and an Environmental and Social Impact Assessment – will be disclosed (in English and Serbian) for public review and comment for a period of 60 days beginning on 28 April 2015. Background studies will also be disclosed. Electronic and/or paper copies in Serbian and in English will be available for review at the locations in Table 3. A public meeting will be held in Alibunar in May 2015. The location and time of a public hearing will be advertised in the public media listed in Table 4 at least a week before the hearing is held.

<i>Location</i>	<i>URL</i>	<i>Street address(es)</i>	
WindVision	www.WindVision.com	10 Zarka Zerenjanina str. Alibunar	18-20 Obilicev venac str., Floor VII, Apr. 1 & 2 Belgrade
EBRD	www.ebrd.com	Bluecentre building Španskih boraca 3, 6 th floor Novi Beograd	One Exchange Square London EC2A 2JN United Kingdom
Alibunar	www.alibunar.org.rs	Municipality of Alibunar Trg Slobode 4, 26310 Alibunar Phone: + 381 13 641 031	
Pančevo	www.pancevo.rs	Town of Pančevo Trg kralja Petra I 2-4, 26000 Pančevo Phone: + 381 13 346 393	
Vladimirovac		Cara Lazara 76, Vladimirovac	
Seleuš		Branka Radicevica 2, Seleus	
Banatsko Novo Selo		Marsala Tita 67, Banatsko Novo Selo	

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Table 4. Public Media in Which Announcements Will be Made
Dnevnik , Novi Sad - national press
Hlas Ludu , Novi Sad – Slovakian language press
Libertatea , Pancevo - Romanian language press
Familia , Vladimirovac (Alibunar) - Romanian language press
Radio-TV Serbia , Belgrade – National radio

7 Grievance Mechanism

WindVision will accept all comments and complaints associated with the Project or the Company, including comments on the ESIA documents. An example form that can be used to submit grievances is provided in Appendix A. This is only an example form and does not have to be used in order for a grievance to be made. (A separate mechanism will be available to employees of WindVision and contractors.)

Any person or organisation may send comments, complaints, requests for information, or other communications in person or via post/mail, telephone, or email using the contact information provided below. Individuals who submit comments or grievances have the right to request that their name be kept confidential. Grievances may be submitted anonymously, although in such cases, the person will not receive any response.

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. All grievances will be registered and acknowledged within five working days and responded to within 20 working days.

Contact details for submitting comments and concerns regarding the Project are available in Section 8 below.

8 Developer’s Contact Information and Responsible Person

Communications with WindVision regarding Alibunar A may be directed to:

WindVision Wind Farm A d.o.o. (or WindVision)
Postal address: 10 Zarka Zerenjanina str., Alibunar
Phone: + 381 11 3283 527
Fax: + 381 11 6301 527
E-mail: milicia.vukojcic@windvision.com
Contact person: Milicia Vukojcic

Appendix A – Grievance Mechanism

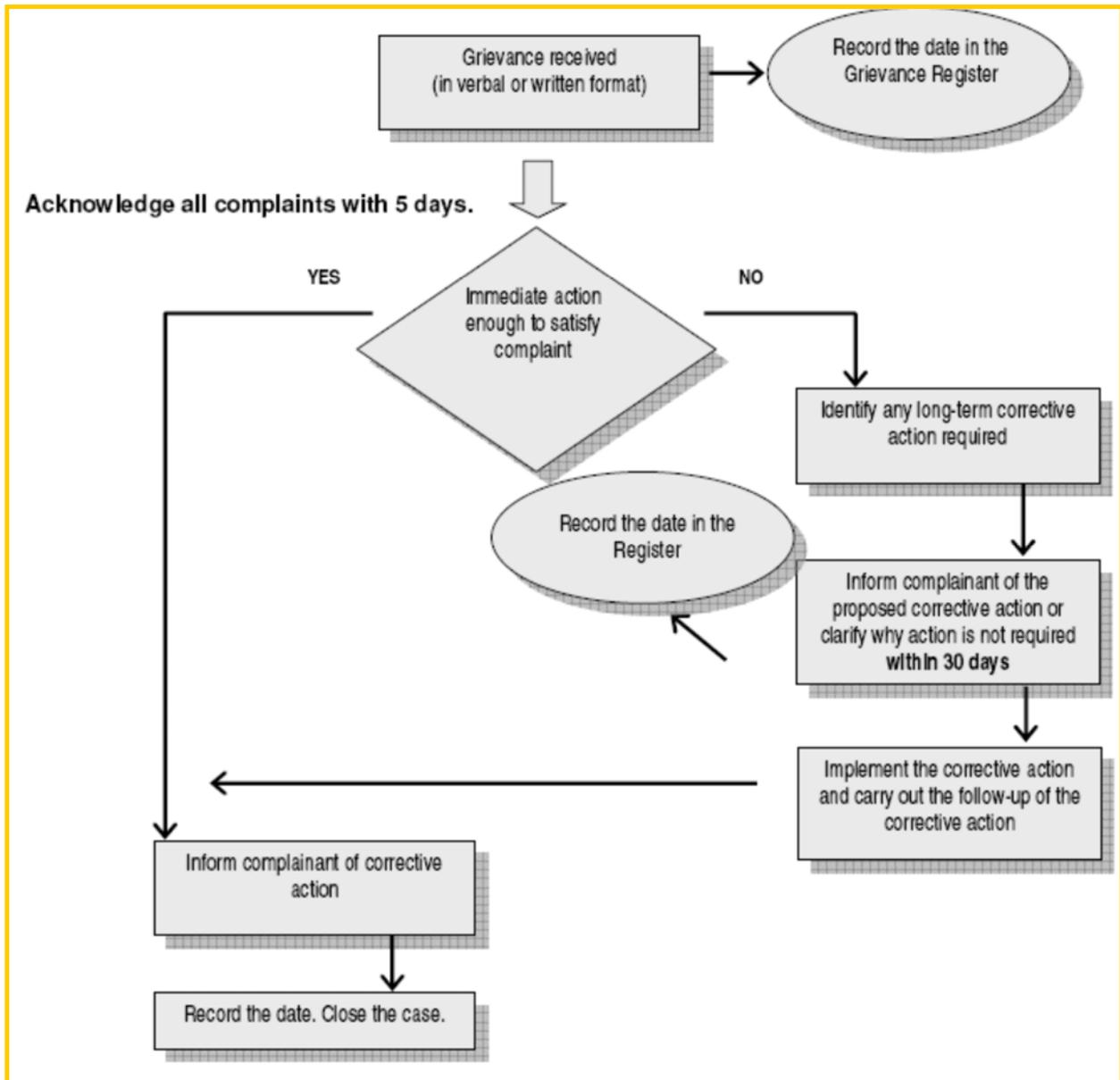


Figure A-1 – Flowchart for processing grievances

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Figure A-2 – Example Grievance Form

Grievance Form	
Reference No:	
Full Name (optional)	
Contact Information (optional) Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Description of Incident or Grievance:	
What happened? Where did it happen? Who did it happen to? What is the result of the problem? _____ _____	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
_____ _____	
Please return form to: Alibunar Windfarm A 10 Zarka Zerenjanina str. Alibunar, Serbia	Or to: Phone: + 381 11 3283 527 Fax: + 381 11 6301 527 E-mail: milicia.vukojicic@windvision.com Contact person: Milicia Vukojicic