

Stakeholder Engagement Plan Margonin Wind Farm project Poland

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Contents

	Page
1 Introduction	1
2 Requirements	1
3 Summary of Previous Stakeholder Engagement Activities	2
4 Stakeholder Identification and Analysis	3
5 Disclosure of Information	6
6 Stakeholder Engagement Program	7
7 Grievance mechanism	9
8 Monitoring	12
9 Resources and Responsibilities	12
10 Timetable	12

1 Introduction

This Stakeholder Engagement Plan (SEP) describes the communication and consultation associated with the construction of the Margonin Wschód and Margonin Zachód wind farms, a project that has already completed more than 50 out of 60 wind turbines with auxiliary structures (access roads, service yards, cable connections) by the end of 2009. It will describe who may be affected by the project and how communication is planned during the remainder of project implementation and operation, including how grievances will be handled.

The EDP Renovaveis company (further: EDP, the Company) is finalizing development of the wind farms of a total capacity 120 MW in the vicinity of Margonin, Chodzież County, central Poland, which comprise:

- Margonin Zachód wind farm, where 11 wind turbines of a capacity 2 MW each and total capacity 22 MW are installed;
- Margonin Wschód wind farm, where 49 wind turbines of a capacity 2 MW each and a total capacity 98 MW are installed.

The project is a first stage of a larger development planned by the Company in the same area. The further development of the project assumes:

- installation of 60 wind turbines, 1.5 MW each, i.e. 90 MW in total, to be located in the Gołańcz commune (for this part of the project the EIA has already been elaborated and the Company applied for the administrative decision on environmental conditions to accept the investment);
- installation of 5, 1.5 MW wind turbines of a total capacity 7.5 MW in Gołańcz commune (for this part of the project the Company applied for the establishment of the local zoning plan);
- installation of 31 wind turbines in the Wągrowiec commune (for this part of the project the Company applied for the establishment of the local zoning plan).

After ultimate completion, the wind farms operated by the company in the area will have a total capacity of 240 MW.

The project consists also of a electrical switching substation located in the village of Sypniewo as well as the overhead, 110 kV overhead power line connecting the switching station with the national power grid.

2 Requirements

According to the Polish legal framework, the disclosure of information and public consultation is a part of the investment process if the project can significantly influence the environment, as a part of the Environmental Impact Assessment (EIA). Moreover, the

information on issued decisions, penalties and other environmental impacts is generally available on request from the environmental authorities. Public participation is also a part of administrative procedures related to establishment of local, regional and national plans and programs, however, this does not apply directly to the subject Project.

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

3 Summary of Previous Stakeholder Engagement Activities

The stakeholder engagement activities conducted to date comprised providing the community with the information on the project both as a part of the of the pre-construction activities and under the requirements of the law with respect to public consultation procedures within the scope of the environmental impact assessment of the project.

The pre-construction activities comprised a number of meetings with the local authorities and inhabitants. The purpose of these meetings was to inform the local society about the planned investment negotiate the land lease locations and conditions.

The official contacts with the stakeholders took place at the stage of EIA procedures conducted by the local authorities in Margonin. As a part of the procedures, the following actions were undertaken by the Margonin County Office:

- The information on EIA procedure related to Margonin Zachód was made available to the public in the form of announcements on the notice boards in the County Office as well as in the village expressing interest, and on the County Office web page (www.margonin.pl). The public consultation period was 21 days, following the procedural requirements. No comments, requests or any other communication from the citizens or organizations were received during the consultation period.
- The information on EIA procedure related to Margonin Wschód was made available to the public in the form of announcements on the notice boards in the County Office as well as in the village expressing interest, and on the County Office web page (www.margonin.pl). The public consultation period was 21 days, following the procedural requirements. No comments, requests or any other communication from the citizens or organizations were received during the consultation period.
- The owners of the lands on which the wind turbines had been intended for construction were informed by individual letters about the ongoing EIA procedures and the opportunity for comments and consultation.
- The Mayor of Margonin County gave an interview in a December 2007 edition of the "Informator Samorządowy" periodical newspaper of the Margonin County, in which

the planned Margonin Wschód wind farm development was described and the information on the availability of the EIA reports was provided;

- Public announcements about the Margonin Wschód EIA procedure were printed in the weekly newspapers “Chodzieżanin” (county-wide) and Tygodnik Nowy (region-wide).
- After completion of the EIA procedures the respective information was made available by the Mayor of the Margonin County to the public in the form of announcements on the notes boards in the County Office as well as in the village expressing interest, and on the County Office web page (www.margonin.pl).
- After the completion of the EIA administrative procedures, information on the acceptance of the EIA and issuing of the decision on the environmental status of the investments were published.

Within the EIA procedures, the authorities at the County level (Chodzież County Office, and Province Sanitary Inspection Authorities) were informed about future investments.

Similar process of EIA procedures took place in relation to pre-investment process of overhead power line construction in 4th quarter of the year 2008.

4 Stakeholder Identification and Analysis

The following stakeholders of the Project were identified:

Population:

- citizens of Margonin Community
- citizens of Gołańcz Community
- citizens of Wągrowiec Community

Neighboring communities:

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

- Margonin commune borders with the following communes:
 - Budzyń – to the south;
 - Chodzież – to the west;
 - Szamocin – to the north
 - Gołańcz – to the east
 - Wągrowiec – to the east

The Pawłowo wind farm will be located in the Communities of Gołańcz (area 192 km², population approx. 8400) and Wągrowiec (area 347.5 km², population approx. 11.000), county of Wągrowiec, Wielkopolskie province.

- the Gołańcz community borders with the following communities:
 - Damasławek
 - Kcynia
 - Margonin
 - Szamocin
 - Wapno
 - Wągrowiec
 - Wyrzysk

- the Wągrowiec community borders with the following communities:
 - Budzyń,
 - Damasławek
 - Gołańcz
 - Margonin
 - Mościsko
 - Rogoźno
 - Skoki
 - Wągrowiec

Non Governmental Organization

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

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

Due to the planned project development, also the associations registered in the county of Wągrowiec may be potentially interested in the Project development. Among more than 80 associations registered there the following can be considered as the potential stakeholders:

- Towarzystwo Przyjaźni Ziemi Pałuckiej in Wągrowiec
- Forum Obywatelskie Powiatu Wągrowieckiego
- Polskie Towarzystwo Turystyczno-Krajoznawcze, Wągrowiec
- Grupa Ekologiczno-Kulturalna Okres Ochronny, Wągrowiec

Academic institutions:

None

Workers Stakeholders

- Employees of EDP Renovaveis in Poland
- Subcontractors.

Administrative stakeholders

Administrative stakeholder	Administrative level	Responsibilities
Burmistrz Miasta i Gminy Margonin (Mayor of Margonin Town and Commune)	Local	in charge of the investment process
Burmistrz Miasta i Gminy Gołańcz (Mayor of Gołańcz Town and Commune)	Local	in charge of the investment process (for the future project development)
Wójt Gminy Wągrowiec (Mayor of Wągrowiec Commune)	Local	in charge of the investment process (for the future project development)
Regionalny Dyrektor Ochrony Środowiska w Poznaniu (Regional Environment Protection Directorate in Poznań)	Province	in charge of EIA procedure opinion and acceptance
Marszałek Województwa Wielkopolskiego (Marshal of the Wielkopolskie Province)	Province	in charge of environmental permits and acceptance of reports on use of environment
Wojewódzki Inspektor Ochrony Środowiska (Province Inspectorate of Environmental Protection)	State	in charge of control of environmental performance of the company
Państwowa Inspekcja Pracy (State Labour Inspectorate)	State	in charge of H&S and labour conditions control
Powiatowy Inspektorat Sanitarny (County Sanitary Inspectorate)	County	in charge of sanitary conditions at the site
Państwowa Straż Pożarna (State Fire Department)	State	in charge of the fire protection
Powiatowy Inspektorat Nadzoru Budowlanego (County Construction Inspectorate)	County	In charge of project completion acceptance and issuing of operational decision
Others (e.g. Police, Road Transport Inspectorate)	State	respectively

Lenders: the banks co-financing the development.

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

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

5 Disclosure of Information

The Margonin wind farm project is at a far development stage and no disclosure of information is required by law, except for the formal notifications to the authorities after completion of the project and reporting on environmental impacts – according to the environmental regulations. The further project development (the Pawłowo wind farms) will require a public consultation procedure (to be conducted by the involved communities), however, the Company will be responsible to provide the necessary documents (e.g. EIA reports) and information to be disclosed.

A summary of environmental and social impacts, mitigation measures taken, Environmental and Social Action Plan, EIA reports, annual reports on the Project development, post-construction monitoring results and other Project-related documents will be put in the public domain of the company (<http://www.edprenovaveis.com/>, under the link sustainability/EDPR in the community/Polonia sustainability).

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

Internal stakeholders (Workers) will be informed using the existing communication channels and following the rules of internal communication as set by the integrated management system to be developed in the near future. The routine communication channels comprise: periodical meetings, announcements, information letters and notifications posted on information boards, trainings, flow of information through the management chain.

The disclosure of information to external stakeholders (non governmental organization, neighboring communities) will take place in response to direct queries, complaints or objections, following the appropriate procedure to be implemented in the environmental, health and safety management system and appropriately prior to the time of milestones to recognize external stakeholders attitude and be able to react accordingly. Information with the project description will be placed on EDP web page (<http://www.edprenovaveis.com/>, under the link: sustainability/EDPR in the community/Polonia sustainability) , additional information will be published in local press: “Głos Wągrowiecki”, “Głos Wielkopolski”, “Tygodnik Nowy” and “Margoninski Informator Samorządowy. On the same webpage the company will present the annual reports presenting the environmental and social issues related to the project. The report for the previous year will be presented by the end of 2rd quarter of each year.

6 Stakeholder Engagement Program

The consultation with the stakeholders will be conducted by the Environmental Specialist of the EDP Renovaveis in Poland, with co-operation with the Company Manager. Any Grievances related to construction activities will be managed by the Mediation Officer of the company.

Consultations with the administrative stakeholders will follow the Project assumed time schedule. At this stage it is assumed, that these stakeholders will be informed in advance of the planned project milestones. It is expected, that final commissioning of the Margonin wind farms will take place in December 2009/February 2010. The development of the Pawłowo wind farm will depend on the development of the local planning procedure and EIA procedures, which cannot be ultimately established now. Information on the on-going administrative procedures will be published by the Gołańcz and Wągrowiec communities following the requirements of the local planning and environmental regulations.

Consultations with the internal stakeholders will be provided to workers separately from this document. At a minimum, communication will involve meetings, information boards, and an intranet system.

Project related information will be posted on the informational boards at the company headquarters. Information on the project milestones will be published in advance on internet pages to be available for the public and non-governmental organizations to recognize external stakeholders attitude. In addition the company will present information on the project in the local newspapers: "Głos Wągrowiecki", "Głos Wielkopolski", "Tygodnik Nowy" and "Margoninski Informator Samorządowy". Moreover, the disclosure information package which comprises:

- EIA reports;
- On-site environmental and nature inventories and monitoring results;
- Administrative decisions related to the Project
- Annual Project-related reports

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

Urząd Miasta i Gminy
Margonin
ul. Kościuszki 13
64-830 Margonin
tel. fax (+48-67) 28
46 068

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

Urząd Gminy Wągrowiec
ul. Cysterska 22
62-100 Wągrowiec
tel. +48 067 268 08 00

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

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

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

Stakeholder	Objective and consultation method	Proposed milestones	Responsibility
Neighboring communities, citizens, NGOs	Announcement of the Margonin Wind Farms commissioning and start-up Information board/announcement of the Authorities in the respective communities buildings	January/February 2010	Company and local administration
	Announcement of the Margonin Wind Farms commissioning and start-up Internet	January/February 2010	Company and local administration
	Announcement of the Margonin Wind Farms commissioning and start-up Local press	January/February 2010	Company
Neighboring communities, citizens, NGOs	Announcement of the Pawłowo Wind Farms EIA procedures, commissioning and start-up Information board/announcement of the Authorities in the respective communities buildings	According to the actual Project Development schedule	Company and local administration

	Announcement of the Pawłowo Wind Farms EIA procedures, commissioning and start-up Internet	According to the actual Project Development schedule	Company and local administration
	Announcement of the Pawłowo Wind Farms EIA procedures, commissioning and start-up Local press	According to the actual Project Development schedule	Company
Government authorities	Information meetings and consultations	On-going on a permanent basis	Company, Managing Director, Environmental Specialist
Workers	Internal meetings employees and managers	On, going process on a permanent basis: quarterly and monthly , respectively	Company – Managing Director, Environmental Specialist
	Everyday contacts	On-going process on a permanent basis	Company, Managers, Environmental Specialist
Lenders	Information on project status Submission of annual reports, information on any project-related events that could potentially create an increased risk of project	On-going process on a permanent basis	Company

7 Grievance mechanism

The formalized grievance mechanism will be developed and implemented by the company prior to final commissioning of the Margonin wind farms. The grievance mechanism will be also incorporated into the environmental, health and safety management system that the company plans to implement by the end of the year 2011.

It is expected, that two types of concerns might be raised by the stakeholders:

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

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

- a citizen notifies the company or authorities on real or potential damages;
- the authorities inform the Company of the complaint;
- within 5 working days, the Mediation Officer of the company contacts the complainant and arranges to meet him or her at the place of the notified damage or other convenient location, depending on the issue of concern;
- the complaint will be investigated, and if found to be valid, the scope of damages and a level of compensation would then be negotiated between the complainant and the Mediation Officer;
- if agreement is achieved the compensation is paid to the complainer within 30 days.

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

The entire procedure is recorded by the Company.

Such grievances should be addressed to:

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

Other Grievances

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

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

Environmental Specialist

ENGINEERING, CONSTRUCTION & ENVIRONMENT

Pulawska Financial Center, 15

Pulawska Street C.P.

02-515, Warsaw, Poland

Phone: (48) 225214700 Ext. 40 125

Fax: (48) 225214700-01

e-mail: Marta.Porzuczek@edprenovaveis.com

The planned public grievance form is presented in the table below. Such form (both in English and Polish) will be posted EDP webpage, together with the description of the grievance response mechanism and provided to the relevant authorities in the municipalities, in the event anyone approaches them with a concern.

Table. Public Grievance Form.

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

8 Monitoring

The SEP will be monitored by a Managing Director.

9 Resources and Responsibilities

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

Responsibility for the plan implementation will bear the Managing Director.

10 Timetable

The communication with the stakeholders are planned before the final commissioning of the Margonin wind farms – December 2009/February 2010.

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

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