

Stakeholder Engagement Plan

EDP Renewables, Pestera and Cernavoda Windfarms, Dobrogea Region, Romania



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1 Introduction

1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) developed by EDP Renewables Romania, (hereafter EDPR), describing the key stakeholders and the information and communication plans intended in regard to the development of two new wind farms (Pestera and Cernavoda) and associated infrastructure intended in the Dobrogea Region of Romania.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that EDPR will adopt and those which will be used for the current modernisation programme.

The SEP will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary.

The specific objectives of the SEP are detailed below.

1.2 OBJECTIVES OF THE PLAN

The methods, procedures, policies and actions undertaken by EDPR to inform stakeholders, in a timely manner, of the potential impacts of projects are the key subject of this document.

A level of stakeholder engagement has already taken place as part of the requirements of the Environmental and Social Impact Assessment (hereafter ESIA) of the project. Communication will continue as further planning and design activities are progressed and through the project implementation.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact EDPR and ask to be included in the future information and communication. Furthermore, this document describes the way that any concerns or grievances will be handled by the company.

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

1.3 SCOPE OF THE PLAN

This document covers the following:

- Chapter 2 – Modernisation programme and project description, location of the site and key environmental and social issues;
- Chapter 3 – Public consultations and information disclosure requirements;
- Chapter 4 – Identification of stakeholders and other affected parties;
- Chapter 5 – Overview of previous EDPR stakeholder engagement activities;
- Chapter 6 – Stakeholder engagement programme and methods of engagement and resources; and
- Chapter 7 – Grievance mechanism.

2 Project Description

2.1 OVERVIEW OF THE PROPOSED EDP PESTERA AND CERNAVODA SITES

It is intended that EDP R will develop two new wind farms at Pestera and Cernavoda along with associated infrastructure developments.

Proposed Location of Sites

The Project sites are located in the County of Constanta in the south-west region of Romania, approximately 33km (Pestera) and 45km (Cernavoda) respectively west of the Black Sea coast. Both sites are located in rural areas. The distance between the Pestera and Cernavoda sites is 9km.

Pestera

The site at Pestera is located approximately 2.5km south-west of Pestera and 1km south of Ivrinezu Mic and to the south east of Rasova. The site is accessed via the DJ223b to the west and the DJ222 to the east. The eastern part of the site is located near the Irvinezului Valley and the Movila Lui Lipan. The Danube to Black Sea Navigable Canal, a tributary of the River Danube is located approximately 2km to the north of the site, with the River Danube being approximately 5km to the west.

Cernavoda

The site at Cernavoda is located approximately 1km south west of Tibrinu and approximately 4km east of the town of Cernavoda. To the north of the site are a lake, the villages of Tibrinu and Gherghina and the boundary of the Cernavoda administrative area. The village of Stefan cel Mare is located to the east and to the west is the boundary of the Micea Voda commune. The areas of Faclia and the outskirts of Mircea Voda and Saligny are present to the south.

PROPOSED DEVELOPMENTS

Pestera

The proposed wind farm at Pestera will contain 30 wind turbines (turbine model VESTAS V90 3.0 MW), providing a total power of 90MW. Each wind turbine consists of a hollow steel tower with a generator nacelle, gearbox and control system and fibreglass rotor with 3 blades. The turbines will each have a total height of 150 m (comprising 105 m tower and 45 m rotor blade above the tower height). The tower is tubular with a diameter of 4.15m at the base and 2.30m at the top, comprising 5 sections. Each turbine will be fitted with two integral transformer stations (at 690 V to 20,000 V) within the turbine nacelle. The turbines are to be connected through 20kV underground cables which will be connected to a transformer station. On start up each turbine will consume around 15 kV of electrical energy and will be connected to the following one by electrical cables of varying diameters according to the cumulative power of the turbines, resulting in 5 branches (with a maximum of 6 turbines on each branch).

The transformer station will be connected to the electricity grid via the nearest ENEL Dobrogea transformer station (110/20kV). The wind turbines will power a non-synchronously electric generator with 4 poles placed in a fibre glass box that protects all the turbine components against atmospheric conditions.

Cernavoda

The wind farm site is located within the development boundary of Cernavoda city and the communes of Mircea Voda and Saligny. The plot of land of approximately 2,888 ha of which approximately 23ha will be taken from the current agricultural land use.

The proposed Cernavoda wind farm comprises 46 wind turbines (turbine model VESTAS V90 3.0 MW), providing a total power of 138 MW. The specifications of the wind turbines will be the same as described for the Pestera site above, i.e. hollow steel towers and fibreglass rotor with 3 blades of a total height of 150 m (comprising 105 m tower and 45 m rotor blade above the tower height) fitted with two integral transformer stations (at 690 V to 20,000 V) within the turbine nacelle. The turbines will be connected, through 20kV underground cables and 11 junction stations (of 20m² in area) which will be connected to a transformer station within the wind farm, this will then be connected to the nearest ENEL transformers

A fuller description of the proposed project and current land uses is currently available in the initial Environmental Impact Assessments for the developments, available from EDP Renewables at:

Laura Lazar
Environmental Specialist
EDP Renewables
CA Rosetti, 17
Regus Office Building – Office 300
020011 Bucharest, Romania
Tel: 00 40 725 929 884
Fax: 00 40 212010 892
e-mail: lauralazar@edprenovaveis.com

3 Public Consultation and Information Disclosure Requirements

THE REQUIREMENTS

Public consultations and information disclosure to be undertaken by EDPR will comply with the requirements of the legislation of Romania and best international practice, as described in requirements of the European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC).

Specific EBRD and IFC guidance used in the preparation of this SEP includes:

- EBRD (2003). EBRD Consultation and Disclosure Requirements - Guidance for Category A Projects. EBRD Environment Department, July 2003.
- EBRD – Guide to Performance Requirement 10; Information Disclosure and Stakeholder Analysis, EBRD Environmental and Social Policy. May 2008.
- IFC – Guidance Note 1. Social and Environmental Management Systems (July 2007).
- IFC – Guidance Note 4. Community Health, Safety and Security (July 2007).

General Stakeholder Communication Records Maintenance

A formalized grievance mechanism has been developed and implemented by the company to cover both the construction and operational phases of the Pestera and Cernavoda wind farms. The grievance mechanism will be also incorporated into the environmental, health and safety management system that the company will implement for the sites. The system will also be publicized on notice-boards in public venues in local communities, and via local media (newspapers/radio).

A communication records procedure will be developed which will log the key information provided to stakeholder and also the key incoming communication (i.e. general questions, complaints etc) to EDPR, along with a summary of action taken.

As part of this communications procedure, EDP R will record and update these ongoing stakeholder engagement activities on an ongoing basis.

Best International Practice

The key principles of effective engagement are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;

-
- Clear mechanisms for responding to people's concerns, suggestions, and grievances; and
 - Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

4 Stakeholder Identification

4.1 IDENTIFICATION OF MAIN STAKEHOLDERS

Overview

This section of the document identifies interested parties i.e. stakeholders and others affected at a local, district and regional level.

Stakeholders could also be individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views.

EDP R has undertaken an initiative to identify its key national stakeholders. In doing this the following definitions have been applied:

- **Stakeholders:** any person, group or organisation with a vested interest in the outcome of a body of work; and
- **Key stakeholder:** any stakeholder with significant influence on or significantly impacted by, the work and where these interests and influence must be recognised if the work is to be successful.

There are partnerships and formal advisory arrangements and also less formal but important relationships with groups or individuals with a particular interest in the work EDPR undertakes.

Stakeholders can be grouped into the following categories:

- International – EBRD Bank/ IFC;
- International parent company and shareholders;
- Government (Romanian state / regional and local);
- Advisory/non-government;
- Services / suppliers;
- Clients;
- Institutions (universities, think tanks, etc.);
- The construction and construction materials industry;
- Internal stakeholders (Employees, labour unions);
- General communities;
- Public groups - nearby hospital, local schools; and
- The media.

All the key stakeholders identified are presented below. If you are not on the list and would like to be kept informed about the company and project, please contact:

Laura Lazar (Tel: 00 40 725 929 884. e-mail: lauralazar@edprenovaveis.com)

KEY STAKEHOLDERS AND OTHER KEY AFFECTED PARTIES

Stakeholder Groups	Key Stakeholders	Summary of Specific interest
<i>Government: National</i>	Ministry of Economy, Trade and Affairs Environment	Policy on renewable energies – Under SEA for the Energy Strategy
	Ministry for Regional development and Tourism	Regional Development Training, employment and social policy, other procedures / policies
	Ministry of the Environment	Environmental Protection Biodiversity Permitting
<i>Government: Regional</i>	Government: Regional	
	Regional Development Agency Local Office Constanta County Council Constanța	Regional development Local Public Administration authority at county level Coordination of the activity of the local councils, either rural or urban, in view of realisation of county interest public services
	City Hall Pestera	Local Public Administration authority at local level
	City Hall Cernavoda	Local Public Administration authority at local level
	City Hall Saligny	Local Public Administration authority at local level
	City Hall Mircea Voda	Local Public Administration authority at local level
	<i>Environmental Regulator</i>	National Environmental Protection Agency
Regional Environmental Protection Agency Galati		Environmental impact and site regulation at regional level Listed and protected sites
Local Environmental Protection Agency Constanta		Environmental impact and site regulation at county level – Constanta County Listed and protected sites
Romanian Bird Protection Society		

Stakeholder Groups	Key Stakeholders	Summary of Specific interest
<i>Workers Representation</i>	Labour Territorial Inspectorate	Retrenchment, training, employment and social policy, other procedures / policies
<i>Local Community</i>	City Hall Pestera	Local air quality, land use, Construction traffic Migrant workers Locally sourced construction labour and future plant labour opportunities.
	City Hall Cernavoda	
	City Hall Saligny	
	City Hall Mircea Voda	
<i>Local Public Authorities</i>	The local hospital Cernavoda	Local air quality, land use Potential for accidents during construction
	The local emergency services (fire, police) Pestera, Cernavoda	
<i>NGO MARE NOSTRUM</i>	Str. George Enescu nr 32 Constanta Constanta County Romania	
<i>Residents of Cernavoda, and local villages</i>	Information on notice boards at local public venues. Announcements in local newspapers and via local radio and television as appropriate. Leaflet drops.	Information on construction and operational phases
<i>Residents of Pestera and local villages</i>	Information on notice boards at local public venues. Announcements in local newspapers and via local radio and television as appropriate. Leaflet drops.	Information on construction and operational phases

STAKEHOLDER GROUPS: LIST OF MEDIA CONTACTS

Media	Name/Title	Contact Details
<i>Regional newspapers</i>	Atitudinea Dobrogea – weekly newspaper	Website: www. atitudineonline. Ro Also has a printed edition
	Replica Constanta - daily newspaper	Website: www. replicaonline. Ro Also has a printed edition
	Ziua de Constanta	– no details on a website
	Observator de Constanta – daily newspaper	Website: http://www.observator.ro/ Also has a printed edition
	Telegraf de Constanta – daily newspaper	Website: http://www.telegrafonline.ro/ Also has a printed edition
	Independentul de Constanta – daily newspaper	Website: www.independentul-online.ro Also has a printed edition
	Cuget Liber de Constanta – daily newspaper	Website: http://www.cugetliber.ro/ Also has a printed edition
	Flagrant – weekly newspaper	Website: http://www.flagrantct.ro/ Also has a printed edition
<i>Regional radio stations</i>	Radio Constanta - 100.1 FM Address: Vila nr. 1 Mamaia, Constanta	Tel: 0241/831.477, 0241/831.166, 0241/511.535 Fax: 0241/831.216
	Radio SKY - Constanta: 101.1 FM.	Address: Str. I.C.Bratianu nr. 5 Tel: 0241/520.818 Fax: 0241/691.587
	Radio Orizont FM - Medgidia: 97.5 FM	http://www.orizontfm.ro
	Studioul Regional Radio Constanta - Constanta: 100,1 FM	http://www.radioconstanta.ro/
	Studioul Regional Radio Constanta - Constanta: 909 AM	http://www.radioconstanta.ro/
	Radio Neptun – Neptun, 95.9 FM	Str. Ion Roata nr. 3 Tel: 0241/488.390 Fax: 0241/488.391, 0241/488.394
<i>Regional TV stations</i>	ProTV Constanta	Complex Parc Mamaia Telefon: 0241/607.319, 0241/607.319
	Antena 1 Constanta	Str. Pescarilor nr. 1 Tel/Fax: 0241/699.911, 0241/699.922
<i>Local TV station</i>	Televiziunea Neptun	B-dul Mamaia nr. 296 Telefon: 0241/488.340, 0241/488.345 Fax: 0241/831.708

STAKEHOLDER GROUPS: REGIONAL PUBLIC ECOLOGICAL ORGANISATIONS

Stakeholder Groups	Key Stakeholders: Address	Contact Person / Head of organisation
<i>ECO Dobrogea Association</i>	ALEEA DALIEI, Nr. 5, bl. L128A, sc. C, ap. 35, Constanta Constanta County, Romania	
<i>NGO Oceanic Club</i>	Str. Decebal, nr.41 900728, Constanta, Constanta County Romania	

5 EDP R Stakeholder Relations

5.1 OVERVIEW OF EXISTING STAKEHOLDER RELATIONS

EDPR are involved in the local community and have good community relations. A summary of previous engagement activities is shown below:

5.2 SUMMARY OF ENGAGEMENT ACTIVITIES

In accordance with the requirements of National legislation public announcements were made in the media regarding the request for the Environmental Agreement, the commencement of the EIA studies and regarding the issue of the Environmental Agreement and Public Debates were held. A summary of the public debates held for each site is provided below.

Pestera

A Public Debate on the EIA for the wind farm at Pestera was held on 2nd April 2008. This was attended by the EPA and representatives from Pestera City Hall, EIA consultant, Renovatio Power (developer), SC EVIVA ENERGY SRL and three members of the public.

Cernavoda

A Public Debate on the EIA for the wind farm at Cernavoda was held on 6th August 2008. This was attended by the EPA and representatives from Saligny City Hall, EIA consultant, a Wind expert (developer), SC Solaris and one member of the public.

Documents recording the public debates held for both the Pestera and Cernavoda sites were initially published on the EPA and Local Council websites in 2008. Information was also published in local newspapers. The information can now be found on the EPA Constanta website, which provides a list of approved projects for 2008 <http://www.mediu-constantia.ro/pdf/PAG%20WEB%20EIA%202008.pdf>

6 Stakeholder Engagement Programme

6.1 DISCLOSURE OF INFORMATION

The Types of Information to be Disclosed

The information that will be disclosed will be assessed on a specific basis as part of the overall EDPR development programme for the Pestera and Cernavoda sites. In general terms, internal and external communications are handled by EDPR in a number of ways as detailed below. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation.

The Methods of Communication

The methods of communication to be utilised by EDPR are summarised in the following Stakeholder Engagement Programme and will include:

- Publication for public review of the Stakeholder Engagement Plan, Non-technical Summary and Environmental and Social Action Plan;
- Meetings with regulatory bodies;
- Public meetings;
- Published on Local council website;
- Announcements in local media;
- Provision of general information on notice-boards at key public locations; and
- Publication of project information including Environmental Statements for both the Cernavoda and Pestera wind farm development, a Non-Technical Summary, Environmental and Social Action Plan and additional information on the company website – <http://www.edprenovaveis.com/sustainability/EDPR> in the community/Romania sustainability.

6.2 THE FUTURE PROGRAMME

The future programme for stakeholder engagement is presented below.

STAKEHOLDER ENGAGEMENT PROGRAMME

Activity / Project	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups consulted
Publication of ESIA Disclosure Package.	(Stakeholder Engagement Plan, Non-Technical Summary, full ESIA documentation and Environmental and Social Action Plan).	Disclosure: March 2010 Internet – Company website. Local newspapers/radio. Information board/ announcement in respective communities' buildings.	<i>Government (Romanian, regional and local)</i> <i>Advisory/non-government organisations</i> <i>Public groups</i> <i>General communities</i>
Funding approval for the development of the Pestera and Cernavoda Wind farms.	When funding has been arranged, an announcement of full decision to develop the plant and the coverage of the implications (social / employment / EIA etc) will be confirmed to stakeholders.	Press announcements - June 2010 Internet – company website. Local newspapers/radio. Information board/ announcement in respective communities' buildings.	<i>International</i> <i>Government (Romanian, state)</i> <i>Government (Romanian, regional and local)</i> <i>Advisory/non-government organisations</i>
Announcement of construction programme to residents of Pestera and local villages.	Details of propose construction programme including proposed work on local roads and transportation programme for major components (road closures).	Press announcements - April 2010 Internet – company website. Local newspapers/radio. Information board/ announcement in respective communities' buildings.	<i>Government (Romanian, regional and local)</i> <i>Advisory/non-government organisations</i> <i>Public groups</i> <i>General communities</i>

Activity / Project	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups consulted
Announcement of construction programme to residents of Cernavoda and local villages	Details of propose construction programme including proposed work on local roads and transportation programme for major components (road closures).	Press announcements - April 2010 Internet – company website. Local newspapers/radio. Information board/ announcement in respective communities' buildings.	<i>Government (Romanian, regional and local)</i> <i>Advisory/non-government organisations</i> <i>Public groups</i> <i>General communities</i>
Announcement of the Pesteria Wind Farms commissioning and start-up	Formal notification of operation of the wind farm.	September 2010 Internet – company website. Local newspapers/radio. Information board/ announcement in respective communities' buildings. Public meeting.	<i>International</i> <i>Government (Romanian, regional and local)</i> <i>Advisory/non-government organisations</i> <i>Institutions (universities, think tanks etc.)</i> <i>Public groups</i> <i>General communities</i>
Announcement of the Cernavoda Wind Farms commissioning and start-up	Formal notification of operation of the wind farm.	December 2010 Internet – company website. Local newspapers/radio. Information board/ announcement in	<i>Public groups</i> <i>General communities</i>

Activity / Project	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups consulted
		respective communities' buildings. Public meeting.	
Announcements on maintenance activities which may impact on local residents Pestera and Cernavoda and nearby villages	May include road closures for transportation of equipment, etc.	As required Internet – company website. Local newspapers/radio. Information board/ announcement in respective communities' buildings.	<i>Public groups</i> <i>General communities</i>
Employees	Internal meetings, employees and managers.	On-going with monthly review.	<i>Company Management, Health, Safety and Environment Manager</i>

6.3 MONITORING, REPORTING AND FEEDBACK MECHANISMS

Through communication channels such as the presentation of announcements at local community buildings, media and periodic meetings as listed above, EDP R will monitor and provide feedback as appropriate.

For public consultation meetings or public exhibitions, EDP R will use an open book (with pens provided) for recording questions and comments anonymously. A second book will be present for people to record complaints and grievances. The books will be present in an obvious area of the exhibition but in an area that will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by EDP R so that a response and feedback can be made to stakeholders.

6.4 GRIEVANCE MECHANISM

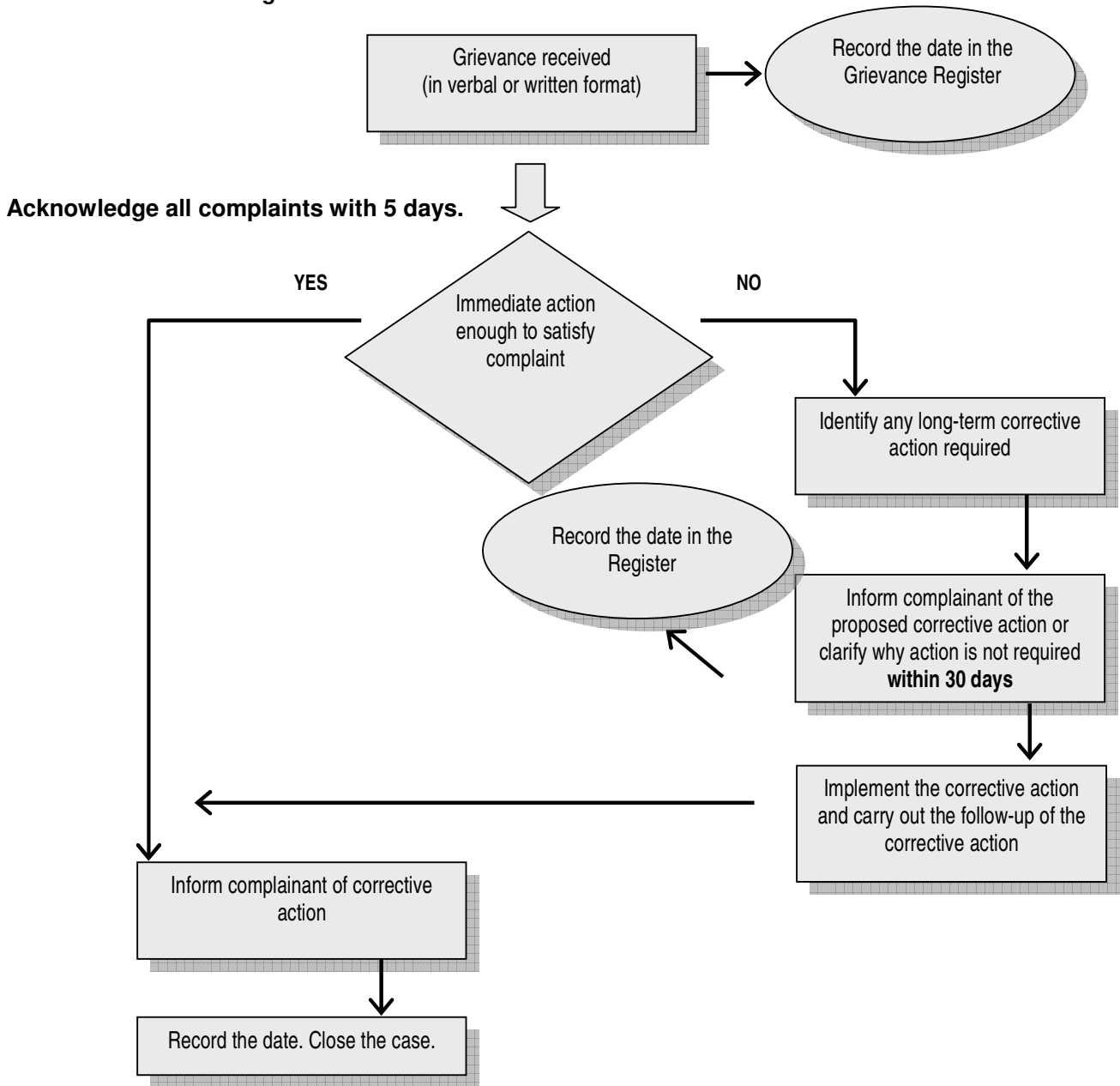
If there are questions or complaints, the following grievance mechanism will be used:

- Direct telephone contact to EDP – Laura Lazar – Tel: Tel: 00 40 725 929 884;
- Email to EDP – e-mail: lauralazar@edprenovaveis.com;
- Via Mail to EDP – Laura Lazar, Project assistant, EDP Renewables, CA Rosetti, 17 Regus Office Building – Office 300, 020011 Bucharest, Romania;
- Via portal on EDP website – <http://www.edprenovaveis.com/>;
- Via local site representative;
- Via security personnel at sites;
- Worker issues can be raised to line managers or Via the trade union representatives; and
- An application to courts.

External complaints relating to the environmental impact of the EDPR plant will be recorded and kept in a communications/ complaints log book. All communications will be acknowledged within [5] business days and a response within [20] business days.

A communications procedure and log will be developed by EDPR for use during the period of the Stakeholder Engagement Plan. This will be used to log all significant incoming and outgoing communications.

Flowchart for Processing Grievances



Public Grievance Form

Reference No:	
Full Name	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____
	By Telephone: _____
	By E-mail _____
Preferred Language for communication	[Romanian] [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?	

Signature: _____

Date: _____

Please return this form to: Laura Lazar, Project assistant
Edp Renewables, CA Rosetti, 17, Regus Office Building – Office 300
020011 Bucharest, Romania
Tel: 00 40 725 929 884
Fax: 00 40 212010 892
email: lauralazar@edprenovaveis.com