

Stakeholder Engagement Plan

Sarichioi Wind Farm, Romania

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1 Introduction

1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) for Sarichioi Wind Farm, Dobrogea Region, Romania and describes public relations and communication plans, regarding the operations and major investment programmes planned in the future.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that EDP Renewables (the owners of Sarichioi Wind Farm) will adopt and those which will be used for major investment programmes.

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 EDP Renewables to inform stakeholders, in a timely manner, of the potential impacts of projects are the key subjects of this document.

Previous stakeholder engagement activities are documented in this SEP.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact Laura Lazar (Engineering, Construction and Environment) at EDP Renewables (contact details provided above) and ask to be included in future information and communications. Furthermore, this document describes the way that any concerns or grievances will be handled by EDP Renewables for the Sarichioi Wind Farm site.

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 – Project descriptions, location of the site and key environmental and social issues;
- Chapter 3 – Identification of stakeholders and other affected parties, and details of public consultations and information disclosure requirements;
- Chapter 4 – Overview of existing stakeholder engagement activities, and summary of the methods of future engagement activities;
- Chapter 5 – Stakeholder engagement programme and methods of engagement and resources, monitoring and reporting mechanisms, and grievance mechanism.

2 Project Description

2.1 OVERVIEW OF THE PROJECT

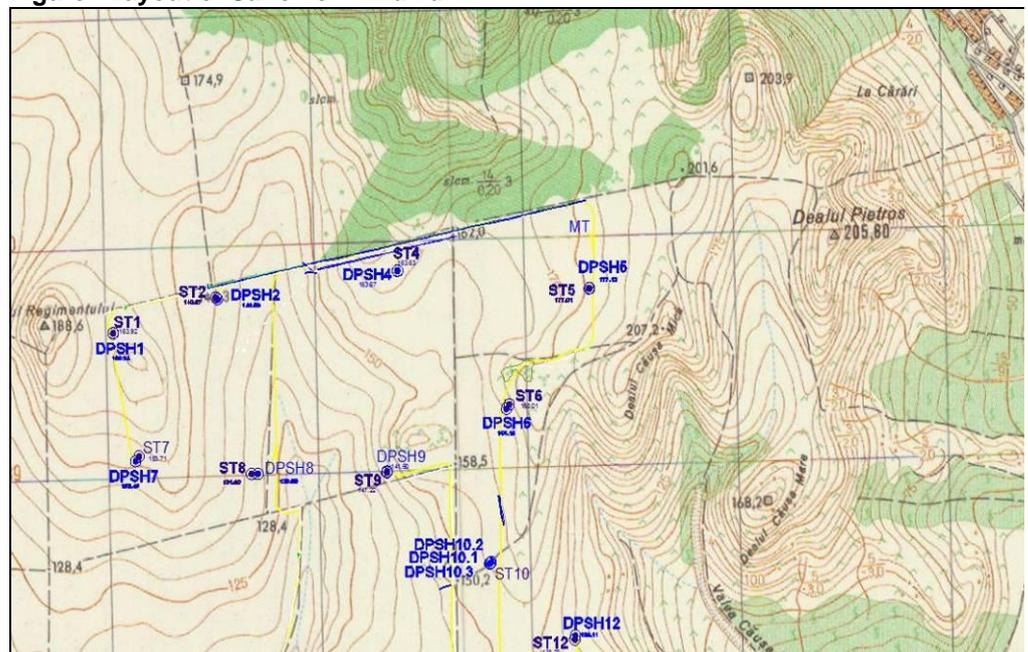
The wind farm at Sarichioi comprises 11 wind turbines (turbine model VESTAS V90 3.0MW), providing a total power of 33MW. Each wind turbine consists of a hollow steel tower with a generator nacelle which houses and protects the main components of the rotor blades, gear box, transformer and control systems. The turbines each have a total height of 150 m (comprising 105 m tower and 45 m rotor blade above the tower height). Each foundation has a turbine with an area of 324 sqm to a depth of 3 m.

The total area of land allocated for the wind farm amounts to 200 ha. The footprint of the infrastructure works covers an area of approximately 1.35 ha, including access road, the footprint of turbines and the transformer station. The land which was temporarily disturbed during the construction works has been restored. The proposed layout of the wind farm at Sarichioi is shown on Figure 1.

The transformer station is connected to the electricity grid via the nearest ENEL Dobrogea transformer station (110/20kV).

The Project has already obtained Construction Authorisations and environmental permits (in line with Romanian legal requirements). The construction phase is now complete and the wind farm is operational.

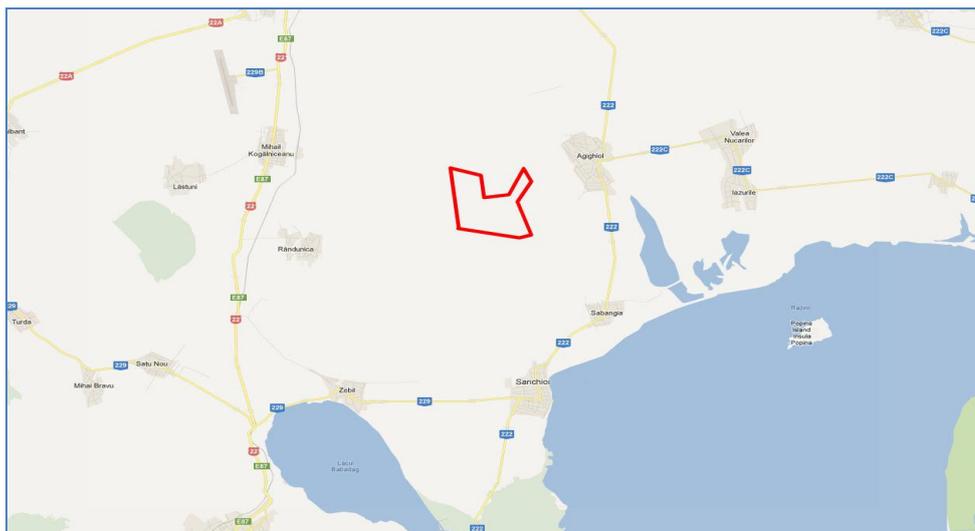
Figure1 Layout of Sarichioi Wind Farm



2.2 SITE SETTING AND LOCATION OF THE WINDFARM

The Sarichioi wind farm is located approximately 7 km north of the Sarichioi commune, and is approximately 4 km west of the town of Sabangia. The nearest village to the Site is Agighiol, which is located approximately 900 m to the north-east (see Figure 2). The current population of Sarichioi is 3,722 and covers an area of 295.95 ha. The site is accessed via DJ222, which links Sarichioi in the south with Tulcea in the north. The land is privately owned and is classed as arable land.

Figure 2 Sarichioi Wind Farm Setting and Context



The site consists of undulating agricultural land (including arable and pasture) and is set within a rural area. There are very few trees on either the site or in the surrounding landscape and one number of single-storey building on the site (a substation) as well as the turbines. There are no major wetlands, significant watercourses or other notable natural features within the site, although a number of large water bodies are located in the wider landscape, approximately 5 km to the east and further to the south.

The Site covers an area of approximately 200 hectares and the wind turbines cover an area of approximately 1.35 ha

There are five protected areas within approximately 10 km of the Sarichioi wind farm, two relating specifically to birds, designated under the Birds Directive, and the other three designated under the terms of the Habitats Directive. The designated sites are as follows:

- Delta Dunării și Complexul Razim – Sinoie (Site Code ROSPA0031) - located approximately 5 km east of the wind farm;
- Delta Dunării (Site Code ROSCI0065) - located approximately 5 km east of the wind farm; and
- Dealurile Agighiolului (Site Code ROSCI0060) - located adjacent to the north, west and east of the wind farm, one of the turbines (turbine 6) is located within the Dealurile Agighiolului SCI;
- Deniz Tepe (Site Code ROSPA0032) – located approximately 10 km west of the wind farm but contains approximately 600 m of overhead transmission line associated with the wind farm; and

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- Deniz Tepe (Site Code ROSCI0067) – located approximately 9 km west of the wind farm but near the overhead transmission line associated with the wind farm.

The Danube Delta Special Protected Area (SPA) and Site of Community Importance (SCI) is protected for its importance to birds, and supports between 470,000 – 950,000 migratory waterfowl annually. The area is a major bird flyway during spring and autumn migration periods for species such as osprey, little tern, pygmy cormorant, ferruginous duck, white-tailed eagle and glossy ibis. The area also includes species such as otter, steppe polecat and European mink. The area is covered by Article 4 of Directive 79/409/EEC and is listed in Annex II of Directive 92/43/EEC. The main characteristics of the area include: bogs, marshes, water fringed vegetation, fens and mud flats.

The Sarichioi wind farm is located outside areas of international ecological importance but is partly on the boundary of the Dealurile Agighiolului Site of Community Importance (SCI) and the Deniz Tepe SPA. One of the turbines is within the boundary of this SCI, which is protected for its important habitats, however it is located on arable land so the integrity of the SCI is considered not to be affected by the wind farm. Approximately 600 m of overhead transmission line and three pylons are located on agricultural land within the Deniz Tepe SPA. As a result of consultation with the Environmental Protection Agency (EPA), the Societatea Ornitologica Romania (SOR) and EcoPontica special provisions relating to monitoring of bird species and mitigation measures have been implemented to deter birds from the wind farm, and in particular the transmission lines within the Deniz Tepe SPA.

2.3 CONSULTATION AND DISCLOSURE

Public consultations and information disclosure undertaken by EDP Renewables will comply with the requirements of the legislation of Romania and best international practice, as described in the requirements of the European Bank for Reconstruction and Development (EBRD).

National Legislation Requirements

EDP Renewables consulted with the authorities to determine if an EIA was required for the development of Sarichioi Wind Farm (it was confirmed that it was required and an EIA Report was subsequently prepared). The company has also consulted with authorities to obtain the necessary certificates and licences to construct, operate and sell power to the grid and commits to do so for any future expansions. Public consultations with local communities have also been undertaken during the course of the project.

European Bank for Reconstruction and Development (EBRD) Requirements

Stakeholder engagement is an essential requirement of EBRD's Performance Required (PR) 10: *Information Disclosure and Stakeholder Engagement*, highlighting the need for on-going stakeholder engagement, which should be meaningful and unbiased and the findings communicated through a document such as this, a SEP. As a Category A project, the Sarichioi Wind Farm will adopt this SEP including a grievance mechanism. The SEP developed is commensurate to the nature of the wind farm scheme and its associated environmental and social impacts, and the level of anticipated public interest. The programme will be rolled out in a timely manner.

On an annual basis, EDP Renewables will produce a public report on the social and environmental performance of the Sarichioi Wind Farm site, including progress made with the implementation of the Environmental and Social Action Plan (ESAP), against

agreed indicators and targets and also report on resolution of grievances associated with the project.

Best International Practice

The key principles of effective engagement for projects 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.

These principles will be reviewed and accordingly adopted by EDP Renewables for the Sarichioi Wind Farm dependent of the nature and size of future projects undertaken.

General Stakeholder Communication Records Maintenance

Communication records will be maintained by EDP Renewables, clearly logging the key information provided to stakeholders and also the key incoming communications (i.e. general questions, complaints etc.) relating to the Sarichioi Wind Farm site along with a summary of actions taken.

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

3 Stakeholder Identification

3.1 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.

In order to identify key stakeholders, 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 stakeholders:** any stakeholders with significant influence on or significantly impacted by, the work and where these interests and influences 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 that EDP's Sarichioi site undertakes.

Stakeholders can be grouped into the following categories:

- International.
- Government (Romanian state / regional and local).
- Advisory non-government.
- Services / suppliers.
- Clients.
- Institutions (universities, think tanks, etc.).
- The power and renewables sector.
- Internal stakeholders (Employees).
- General communities.
- Public groups - nearby hospital, local schools, institutions of national heritage.
- The media.

If you are not on the list and would like to be kept informed about the project, please contact:

Contact: EDP Renewables

Name: Laura Lazar – Engineering, Construction and Environment

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Fax: +40 21 201 08 92

3.2 STAKEHOLDERS APPROACHED DURING THE DEVELOPMENT OF THIS PLAN

A number of stakeholders have been approached during the development of this Stakeholder Engagement Plan and during the project. These include:

- County Council Tulcea;
- City Hall Sarichioi;
- Societatea Ornitologica Romana (SOR);
- National Environmental Protection Agency, Bucharest;
- Local Environmental Protection Agency Tulcea;
- Danube Delta Biosphere Reserve Administration (ABRDD);
- NGO ECO PONTICA, Tulcea; and
- Local communities - Sarichioi Council Members and local residents.

All the key stakeholders identified are presented in Table 1 below.

Table 1: Key Stakeholders and Other Key Affected Parties

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
<i>International</i>	<ul style="list-style-type: none"> <li data-bbox="544 347 1478 419">■ EBRD – London HQ <i>One Exchange Square, London EC2A 2JN, United Kingdom, Switchboard: +44 20 7338 6000.</i> <li data-bbox="544 435 1478 507">■ EBRD – Romania, Bucharest Office <i>Metropolis Center, 56-60, Lancu de Hunedoara Bd. Rd Floor, West Wing, Sector 1, Bucharest.</i> <li data-bbox="544 523 1478 611">■ Vestas Wind Systems A/S <i>Hedeager 44, 8200 Aarhus N, Denmark</i> 	<p><i>Equator Principles</i></p> <p><i>EHSS best practice</i></p> <p><i>Environment and Social Action Plan (ESAP)</i></p> <p><i>Wind turbines supplier</i></p>
<i>Government (Romanian, state/territory and local)</i>	<ul style="list-style-type: none"> <li data-bbox="544 651 1478 794">■ County Council Tulcea <i>Tulcea str. Pacii nr.20</i> <i>Phone: +40 (0)240 511 960 Fax: +40 (0) 240 513 071</i> <i>Web: http://www.cjtulcea.ro/. Email office@cjtulcea.ro</i> <li data-bbox="544 818 1478 1010">■ City Hall Sarichioi <i>Localitatea Sarichioi nr.254, comuna Sarichioi, judetul Tulcea;</i> <i>Phone: +40 (0)240 563 538 Fax: +40 (0)240 563 511;</i> <i>Web: http://www.primariasarichioi.ro/, E-mail: primariasarichioi2@yahoo.com.</i> <i>Mayor: Finoghen Vitali-Cristian</i> <li data-bbox="544 1034 1478 1225">■ City Hall M. Kogalniceanu <i>Localitatea Mihail Kogalniceanu, judetul Tulcea; cod poștal 827145</i> <i>Phone: +40 (0)240 563 001 Fax: +40 (0)240 563 511;</i> <i>Web: http://www.mk-primaria.ro Email: primaria@mk-primaria.ro</i> <i>Mayor: Alexe Anastase</i> <li data-bbox="544 1249 1478 1321">■ National Environmental Protection Agency, Bucharest <i>Web: http://www.anpm.ro/ Email: office@anpm.ro.</i> 	<p><i>Planning and Permitting</i></p> <p><i>Planning and Permitting</i></p> <p><i>Planning and Permitting</i></p> <p><i>Environmental Protection Authorities</i></p>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
<i>(Employees, labour unions)</i>		<i>Employment and social policy & procedures</i>
<i>Public groups</i>	None identified	
<i>General communities</i>	Residents of Sarichioi and Agighiol	<i>Noise</i> <i>Land use and construction traffic</i>
<i>Other key affected parties</i>	<ul style="list-style-type: none"> ■ Renovatio Power 	<i>Other site operator</i>

In general, the media are considered as stakeholders for EDP Renewables, however these details are provided in the next section, where the methods of communication including via the media are demonstrated.

The identification of stakeholders will be reviewed and the range of interested parties can be expanded and contracted as required during the project implementation.

4 EDP Renewables Stakeholder Relations

4.1 OVERVIEW OF EXISTING STAKEHOLDER AND COMMUNITY RELATIONS

The key benefit of this project is the use of reliable renewable wind power technology which will achieve significant greenhouse gas emissions (GHG) savings as opposed to the use of power generation plant using fossil fuels. In addition, the wind farm has created local employment.

In May 2011, a public consultation meeting was conducted by EDP Renewables in Sarichioi, which was attended by members of the local community, regional and local authorities and representatives of the Environmental Protection Agency. The presentation was aimed at describing the various stages of the development and the focus was placed on the environmental implications. The attendance raised questions regarding the exploitation of the land plots surrounding the wind farm site and they were given explanations in this respect that no changes will occur as a result of the wind farm construction and operation.

One of the turbines associated with the wind farm (turbine 6) is located within the Dealurile Agighiolului SCI. Consultation has been held with the SOR and EcoPontica in relation to the proximity of the wind farm to this SCI, including provisions relating to monitoring and the implementation of appropriate mitigation including:

- Power lines are to be marked with visual signalling devices every 50 meters;
- Artificial nests (technical specifications to be provided by SOR) are to be provided for the saker falcon (*Falco cherrug*) on each power pylon in and near the protected area of Deniz Tepe SPA/SCI;
- The risk of electricity poles inside the protected area should be eliminated; and
- The high voltage transmission line shall be monitored from the time of commissioning for a period of 36 months in accordance with the following conditions.

EDPR have implemented several of the measures identified, including installation of artificial falcon nests, installation of flashing beacons on the turbines and painting the turbine blades.

At all stages of the project, EDP renewables has consulted with the authorities to determine if there is a need for an EIA and to obtain the necessary certificates and permits to construct, operate and sell power to the grid. These include:

- Environmental agreement issued by Tulcea EPA (No. 2375 dated 11th August 2009);
- Ministry of Environment, Tulcea Danube Delta Biosphere Reserve Authority (ABRDD) (No. 8989/ARBDD/24.06.2009);
- Romanian Civil Aviation Authority (No. 16773/861 dated 11.08.2009);
- Urban certificate;
- Building permit issued by Tulcea County Council (No. 73/12168 dated 21.12.2010);
- Environmental permit, issued by Tulcea EPA (No. 8372 dated 23.01.2012); and
- EcoPontica (No. 152/20.12.2011), custodians of the Natura 2000 site Deniz Tepe – imposes the conditions listed in Section 2.6 of the supplementary report in relation to “building the current route of the transmission power by Zebil North station”

EDP Renewables are committed to undertaking communications with key stakeholders on future major investments and other key projects, through planning, design and project implementation. This Stakeholder Engagement Plan (SEP) has been developed, with the express objectives of identifying key stakeholders and ensuring that, where relevant, they are informed in a timely manner of the potential impacts of projects. The plan also identifies a formal grievance mechanism to be used by stakeholders for dealing with complaints, concerns, queries, grievances etc.

4.2 SUMMARY OF THE METHODS OF FUTURE ENGAGEMENT ACTIVITIES

EBRD Requirements

An example table demonstrating the type of public consultation and information disclosure that will be recorded for major projects is provided in the next section. EDP Renewables will record the following information for its Sarichioi Wind Farm site on an on-going basis:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, etc.), and how it was released or distributed;
- The locations and dates of any meetings undertaken to date;
- Individuals, groups, and / or organisations that have been consulted;
- Key issues discussed and key concerns raised;
- Response to issues raised, including any commitments or follow-up actions; and
- Process undertaken for documenting these activities and reporting back to stakeholders.

This table will be kept up to date on all public consultation and information disclosure that is undertaken for future projects.

5 Stakeholder Engagement Programme

5.1 DISCLOSURE OF INFORMATION

The Types of Information to be Disclosed

The information that will be disclosed will be assessed on a specific project by project basis. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation.

The Methods of Communication

In general terms, internal and external communications are handled by EDP Renewables in a number of ways.

The types of information disclosed and the specific methods of communication to be undertaken by EDP renewables for the Sarichioi Wind Farm site are summarised in the Stakeholder Engagement Programme in Table 2 below.

5.2 THE FUTURE PROGRAMME

Sources for the communication of information will be presented at key locations, these will include information presented on notice boards at the sites and the local villages.

The Non-Technical Summary (NTS) of the Project, in both English and Romanian, and the Environmental Impact Assessment (EIA) Report is included on the EDP Renewables website and at the following key locations:

EDP web site: <http://www.edprenovaveis.com/>

(under the link: sustainability/EDPR in the community/Romania sustainability)

Also at the following:

EDP Renewables Romania Office

Rosetti Tower Office Building
Maria Rosetti st 6, 3rd floor
Sector 2, Bucharest
Romania
Tel. +40 72 592 98 84

Contact

Ms Laura Lazar
Engineering, Construction and Environment EDP Renewables
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Fax: +40 21 201 08 92

City Hall Sarichioi

Localitatea Sarichioi nr.254
Sarichioi
Judetul Tulcea
Tel: +40 24 056 35 38
Fax: +40 24 056 35 11
Web: <http://www.primariasarichioi.ro>

EBRD Regional Office Romania

Metropolis Center
56-60 Iancu de Hunedoara Bd., 3rd floor, West Wing
Sector 1, Bucharest
Romania
Tel: +40 21 202 71 00
Fax: +40 21 202 71 10

In addition, this Stakeholder Engagement Programme (SEP) and the Project Environmental and Social Action Plan (ESAP) are also included in English and Romanian on the EDP Renewables website.

EDP Renewables will collate any comments and feedback associated with future projects and will document these.

All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within 'The Requirements' section provided in Section 2.3.

All communications will be reviewed for the feasibility to make changes to satisfy the request and interest, and the communicator will be informed on the outcome.

The future programme of engagement is presented below. This will be reviewed and updated on an on-going basis.

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Table 2: Stakeholder Engagement Programme

Activity / Project	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
Annual reporting to investors	Annual reports of social development, environment protection and implementation of Stakeholder Engagement Plan including resolution of grievances associated with the project.	One year after loan signing agreement / reports provided annually comprising: <ul style="list-style-type: none"> - ESAP status - Resolution on grievances - Power generation 	Disclosure to EBRD
Monitoring programme to assess the impacts to birds and bats that may be occurring during the operational phase of the wind farm	<p>For Sarichioi WF, Tulcea EPA (Environmental Protection Agency) and Danube Delta Biosphere Reserve Administration (ARBDD) have recommended biodiversity monitoring during construction works and asked for annual reporting of the results.</p> <p>Statistics and recorded data comprised:</p> <ul style="list-style-type: none"> ■ Bird monitoring throughout to include recording the flying height; maximum approach height towards the wind turbines; modifications of any migration routes; ■ Identification of breeding birds in the area. ■ Monitoring of species of birds or bats found dead near the wind farm. 	In October 2011, the first biodiversity monitoring report was submitted to the EPA and ARBDD.	Disclosure to EBRD, EPA, ARBDD and SOR.

5.3 MONITORING, REPORTING AND FEEDBACK MECHANISMS

Through communication channels such as media, one-to-one meetings and the periodic meetings, EDP Renewables will monitor and provide feedback as appropriate.

Should future important public consultation meetings or public exhibitions be arranged at venues to enable stakeholders to participate, an open book (with pens provided) will be positioned in a suitable location for recording comments anonymously. This book will be presented 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 Renewables so that a response and feedback can be made to stakeholders.

General information on the Sarichioi Wind Farm project will be periodically updated on the EDP Renewables website at:

<http://www.edprenovaveis.com/>

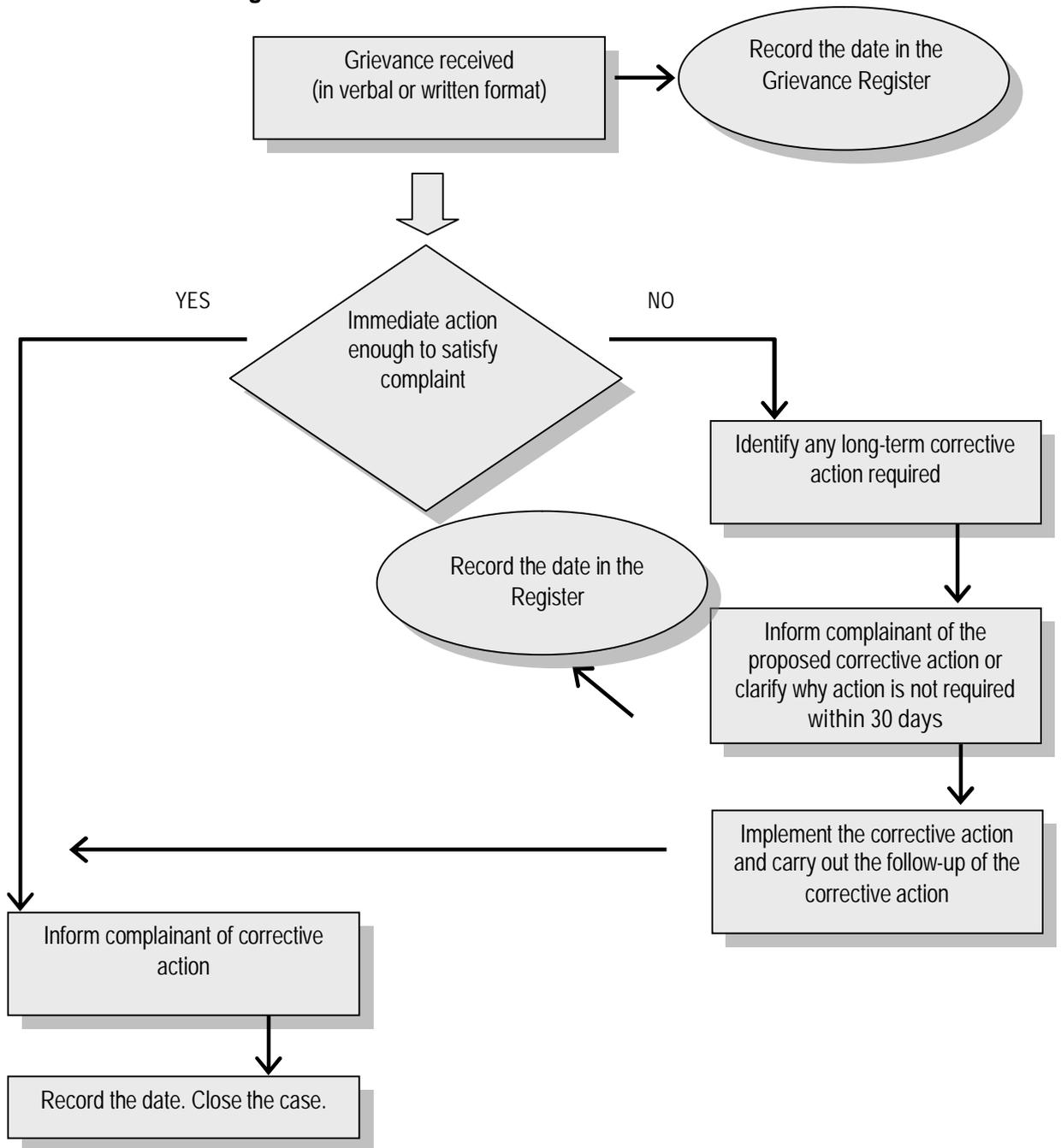
5.4 GRIEVANCE MECHANISM

A grievance mechanism will be adopted as presented in Figure 3 in which the grievance form presented below will be used as required to handle grievances from non-employees. The assessment of grievances will be carried out in accordance with Romanian Law and responses will be provided within one month on a grievance being lodged. The mechanism will be as follows:

- Grievance received;
- Grievance recorded in a register;
- For an immediate action to satisfy the complaint, the complainant will be informed of corrective action;
- Implement corrective action, record the date and close case;
- For a long corrective action, the complainant will be informed of proposed action; and
- Implement corrective action, record the date and close case.

A grievance should be recorded by the complainant using the grievance form below, ensuring that contact details are provided with the preferred method and language of communication. A clear description should be provided of the incident or grievance. EDP Renewables will respond to grievances within one month of receiving the form.

Figure 3: 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).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> [English] <input type="checkbox"/> [Romanian]
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?	

Signature: _____

Date: _____

Please return this form to:
 Laura Lazar – Engineering, Construction and Environment
 EDP Renewables
Address: Rosetti Tower Office Building, Maria Rosetti st 6, 3rd floor, Sector 2,
 Bucharest, Romania
E-mail: Lauralazar@edpr.com