

Stakeholder Engagement Plan

Vutcani Wind Farm, Romania

July 2012



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Contact: EDP Renewables

Name: Laura Lazar – Engineering, Construction and Environment

Address: Rosetti Tower Office Building, Maria Rosetti st 6, 3rd floor, Sector 2,
Bucharest, Romania

E-mail: Lauralazar@edpr.com

Tel: +40212040307

Fax: +40212010892

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1 Introduction

1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) for Vutcani Wind Farm, Moldova 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 Vutcani 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 Vutcani 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; and
- Chapter 5 – Stakeholder engagement programme and methods of engagement and resources, monitoring and reporting mechanisms, and grievance mechanism.

2 Project Description

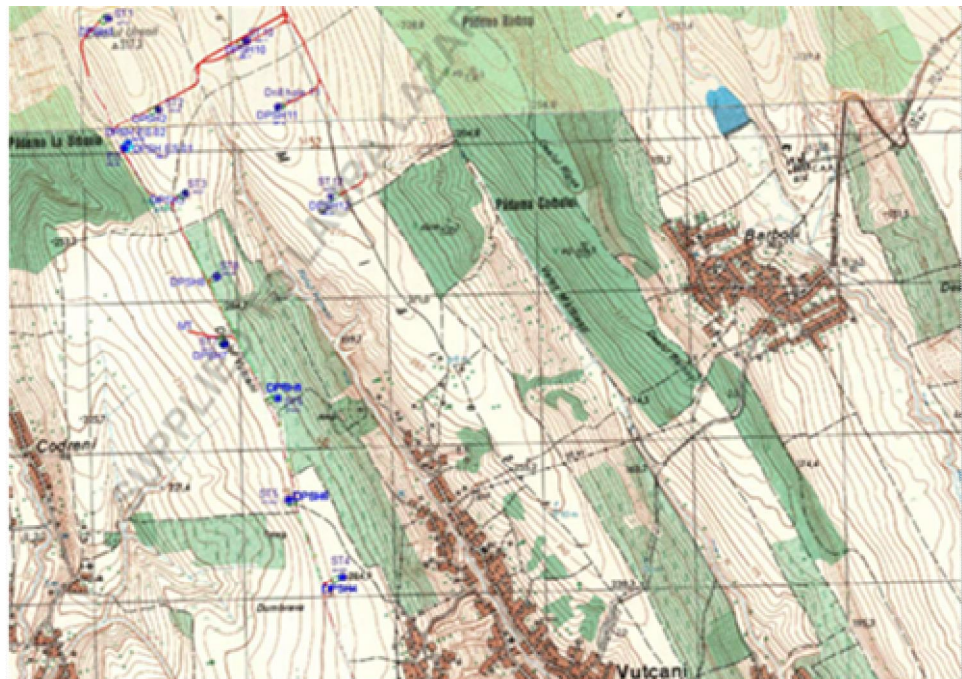
2.1 OVERVIEW OF THE PROJECT

The Vutcani wind farm comprises 12 wind turbines (turbine model VESTAS V90 2.0MW), providing a total power of 24MW. 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 125 m (comprising 80 m tower and 45 m rotor blade above the tower height), fitted with two integral transformer stations (at 690V to 20,000V) within the turbine nacelle. The turbines are connected, through 20kV underground cables and junction stations which are connected to a transformer station within the wind farm and this is then be connected to the nearest E.ON Romania transformers.

The total area occupied by the wind farm is 400 ha, of which approximately 18 ha will be dedicated to the wind turbines and a further 3 ha is used for vehicular access. The remaining land will be used for agricultural use. The land which was temporarily disturbed during the construction works has been restored. The proposed layout of the wind farm at Vutcani is shown on Figure 1.

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.

Figure 1: Vutcani Wind Farm Turbine Layout Plan



2.2 SITE SETTING AND LOCATION OF THE WINDFARM

The Vutcani wind farm is located within the Dumbrava area, and is approximately 1 km west of the town of Vutcani and 3.5 km north-east of Rosiesti village as shown on Figure 2. Approximately 2 km to the north of the Site is Albesti commune. These localities are rural in character and are situated along water courses, roads and farmland.

Figure 2 Vutcani Wind Farm Setting and Context



The Site covers an area of 19 ha and is on land which is privately owned. The land has limited agricultural value and is used for crop production, including wheat. Within the Site there are no forested areas or rare/sensitive plant species. Agricultural land use is not colonised other than by grasses and plants which are fast growing and tolerant to the environmental conditions. Water resources are limited, with no irrigation systems in place; however, approximately 1.5 km east of the Site is the Idrici riverbed, which flows in to the Elan (this riverbed is dry during summer months). The Site is located approximately 9 km south from Lake Manjesti.

Access to the Site is via the DJ224b (asphalt) and links with DN28b between Lasi-Barlad and Vutcani. The road which enters Vutcani is unpaved.

The Vutcani wind farm is not located within the boundary of any protected areas, including Natura 2000 sites such as Special Protected Areas (SPAs), Sites of Community Importance (SCIs) and International Bird Areas (IBAs).

There are three protected areas within 20 km of the Vutcani wind farm, one relating specifically to birds, designated under the Birds Directive, and the other two designated under the terms of the Habitats Directive. The designated sites are as follows:

- Horga - Zorleni (Site Code ROSPA0119) - located approximately 20 km south of the wind farm;
- Pădurea Dobrina – Huși (Site Code ROSCI0335) - located approximately 5 km north of the wind farm; and
- Râul Prut (Site Code ROSCI0213) - located approximately 20 km to the east of the wind farm.

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 Vutcani Wind Farm. It was confirmed that there were no significant environmental issues associated with the development and therefore, an EIA was not required. However, for robustness, an EIA was completed in accordance with Romanian and EU legislation on behalf of Wind Experts in relation to the construction works associated with the development 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 Requirement (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 Vutcani 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 Vutcani 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 Vutcani 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 Vutcani 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 on-going 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 Vutcani site undertakes.

Stakeholders can be grouped into the following categories:

- International.
- Government (Ukrainian 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

Address: Rosetti Tower Office Building, Maria Rosetti st 6, 3rd floor, Sector 2, Bucharest, Romania

E-mail: Lauralazar@edpr.com

Tel: +40 72 592 98 84

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 Vaslui;
- City Hall Vutcani;
- Societatea Ornitologica Romana (SOR);
- National Environmental Protection Agency, Bucharest;
- Environmental Protection Agency Vaslui;
- Local communities - Vutcani 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="539 395 1480 469">■ EBRD – London HQ <i>One Exchange Square, London EC2A 2JN, United Kingdom, Switchboard: +44 20 7338 6000</i> <li data-bbox="539 488 1480 561">■ EBRD – Romania, Bucharest Office <i>Metropolis Center, 56-60, Lancu de Hunedoara Bd. Rd Floor, West Wing, Sector 1, Bucharest.</i> <li data-bbox="539 580 1480 654">■ Vestas Wind Systems A/S <i>Hedeager 44, 8200 Aarhus N, Denmark</i> 	<p data-bbox="1597 395 1995 501"><i>Equator Principles</i> <i>EHSS best practice</i> <i>Environment and Social Action Plan (ESAP)</i></p> <p data-bbox="1597 608 1800 632"><i>Wind turbines supplier</i></p>
<i>Government (Romanian state/territory and local)</i>	<ul style="list-style-type: none"> <li data-bbox="539 715 1518 868">■ County Council Vaslui <i>Ștefan cel Mare Street, nr.79, Vaslui, 730168, județul Vaslui</i> <i>Phone: +40 (0) 235-361.089, +40 (0) 235-361.096 Fax: +40 (0) 235-361.091, +40 (0) 235-361.090</i> <i>Web: http://www.cjvs.ro/ Email: consiliu@consiliu.vaslui.ro</i> <li data-bbox="539 887 1518 992">■ City Hall Vutcani <i>Str. Principala, Vutcani, 737620, judetul Vaslui</i> <i>Phone: +40 (0)235 429 031 Fax: +40 (0)240 563 511</i> <li data-bbox="539 1011 1518 1165">■ National Environmental Protection Agency, Bucharest <i>Splaiul Independentei, nr.294, Sector 6, București, 060031</i> <i>Phone: +40 (0) 21-207.11.01; +40 (0) 21-207.11.02 Fax: +40 (0) 21-207.11.03</i> <i>Web: http://www.anpm.ro/ Email: office@anpm.ro.</i> <li data-bbox="539 1184 1518 1311">■ Local Environmental Protection Agency, Vaslui <i>Judetul Vaslui, Călugăreni Street, nr.63, 730149, Vaslui</i> <i>Phone: +40 (0)335 401 723; +40 (0)746 248 644 Fax: +40 (0)235 361 842</i> <i>Web: http://apmvs.anpm.ro E-mail: office@apmvs.anpm.ro</i> 	<p data-bbox="1597 715 2013 788"><i>Local Public Administration authority at county level</i> <i>Coordination of the activity of the local councils, either rural or urban, in view of realisation of county interest public services</i></p> <p data-bbox="1597 903 1995 943"><i>Local Public Administration authority at local level</i></p> <p data-bbox="1597 1058 1928 1082"><i>Environmental Protection Authorities</i></p> <p data-bbox="1597 1189 1928 1212"><i>Environmental Protection Authorities</i></p>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
	<ul style="list-style-type: none"> E.ON Moldavia Distribution 	<i>Energy production, distribution</i>
<i>Advisory / Non-government Organisations</i>	<ul style="list-style-type: none"> Societatea Ornitologica Romana (SOR) Bd. Mihail Kogălniceanu, nr.49, Sc. A Etaj 1 Ap. 8 Cod 050108, Sector 5, București Phone.: +40 (0)31 425 56 57 Fax: +40 (0)31 425 56 56 Web: http://www.sor.ro Romanian Association for Bat Protection APLR Bucuresti. Bucuresti Sector 2, Bd, Basarabia 57 BI M27 Web: www.aplr.ro 	<p><i>Expertise on birds</i></p> <p><i>Expertise on bats</i></p>
<i>Workers Representation</i>	<ul style="list-style-type: none"> Labour Territorial Inspectorate 	<i>Retrenchment, training, employment and social policy, other procedures / policies</i>
<i>Operational suppliers, clients and client representation</i>	<ul style="list-style-type: none"> Transelectrica SA 	<i>Grid Operator/ Power Purchase Agreement</i>
<i>Institutions (universities, think tanks etc.)</i>	None identified	
<i>Internal stakeholders (Employees, labour unions)</i>	<ul style="list-style-type: none"> Internal Employees 	<p><i>Internal training</i></p> <p><i>Employment and social policy & procedures</i></p>
<i>Public groups</i>	<ul style="list-style-type: none"> Local communities - Council Members of Vutcani, Codreni, Barbosi and other Villages 	<p><i>Local communities</i></p> <p><i>Noise</i></p> <p><i>Land use and construction traffic</i></p>
<i>General communities</i>	Residents of Vutcani, Codreni, Barbosi	<p><i>Noise</i></p> <p><i>Land use and construction traffic</i></p>
<i>Other key affected parties</i>	<ul style="list-style-type: none"> Renovatio Power 	<i>Site operator</i>

In general, the media are considered as stakeholders by 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.

A formal public debate was not required under the provisions of Romanian National Law as part of the permitting process for the Vutcani site. However, consultation meetings were held with Vaslui County Council, representatives of Vutcani City Hall and the Environmental Protection Agency as part of the site permitting procedure.

At all stages of the project, EDP Renewables has consulted with the authorities including 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 Vaslui EPA (No. 12037 dated 12.12.2007);
- Further Environmental agreement issued by Vaslui EPA (No. 19 dated 03.03.2009);
- Romanian Civil Aviation Authority (No. 4268/276 dated 02.05.2009);
- Urban certificate;
- Building permit from Vaslui County Council (No. 3720 dated 28.05.2009); and
- Building permit from Vaslui County Council (No. 2575 dated 26.03.2009).

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 Vutcani 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 Vutcani 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
Fax: +40 21 201 08 92

Contact

Ms Laura Lazar
Engineering, Construction and Environment EDP Renewables
E-mail: LauraLazar@edpr.com
Tel: +40 21 204 0307
Fax: +40 21 201 0892

City Hall Vutcani

Str. Principala,
Vutcani, 737620
judetul Vaslui
Tel: +40 23 542 9031
Fax: +40 24 056 3511

EBRD Regional Office Romania

Metropolis Center
56-60 Iancu de Hunedoara Bd., 3rd floor, West Wing
Sector 1, Bucharest
Romania
Tel: +40 21 202 7100
Fax: +40 21 202 7110

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 'Consultation and Disclosure' 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 which will be reviewed and updated on an on-going basis.

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	Statistics and recorded data to comprised: <ul style="list-style-type: none"> ■ Bird monitoring 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. 	Commence 3 rd Quarter 2012	Disclosure to EBRD, EPA 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.

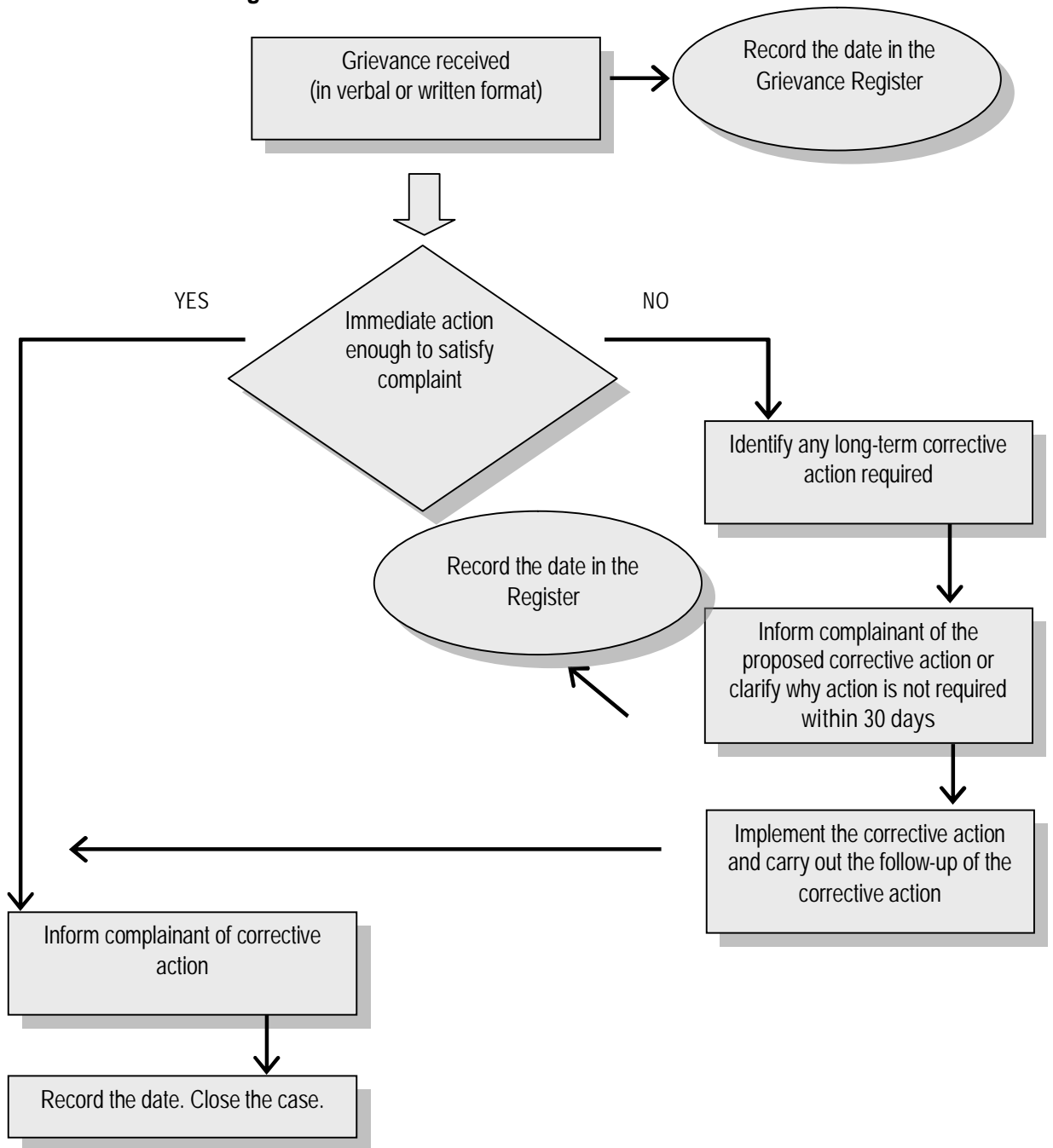
5.4 GRIEVANCE MECHANISM

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