

**Environmental and Social Action Plan  
Margonin, Pawłowo-Budzyń and Pawłowo-Gołańcz Wind Farms  
Poland**

No	Issue	Action	Environmental risks, Liability/Benefits	Legislative requirement/Best practice	Investment needs/resource	Action completion deadline	Target and evaluation criteria
<i>Annual EHS Report to Lenders</i>							
1	Provide to the Lenders information on the Environmental, Social, Health and Safety (ESHS) matters as part of an annual ESHS report.	<p>Need to disclose information to the Lenders to show compliance with ESAP and current status of EHS issues as well as compliance with all permits and regulatory requirements (such as inspections).</p> <p>The report will also include a review of:</p> <ul style="list-style-type: none"> <li>- Bird and Bat monitoring data</li> <li>- Information on any environmental impacts</li> <li>- Information on noise monitoring</li> <li>- Information on social initiatives and local taxes/grants paid to the gmina (community) – ie. Direct and indirect support to local community</li> <li>- Information on any complaints or enforcement notices/warnings/grievance process</li> </ul>	Reporting to Lenders	EBRD requirements	Own resources	During the project lifetime	<p>Report to Lenders on an annual basis</p> <p>The report will include a summary of compliance with the existing corporate ESAP agreed under the Margonin 1 Project.</p>
<i>Actions required to achieve compliance with national EHS legal requirements and EU Environmental standards</i>							
2	Implement all conditions of EIA studies and Environmental	Comply with all permits, permit conditions and results of inspections	Ensure compliance with legislation	EBRD and National requirement	Own resources	During the life of the Project	Report on compliance in annual report

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	decisions.  Fully implement the existing ESAP and ESMMP for Margonin as well as corporate ESAP	and monitoring reports  Need to monitor that all conditions and requirements included in planning permits, EIA decision and environmental permits for the various components are complied with. As part of the corporate EHS management systems a summary should be made of all regulatory requirements and whether these are complied with.					
3	Contractual management to ensure corporate practices are met during construction process, and environmental and social risks are limited.	Within the existing EHS management systems and corporate requirements develop labour and social policies and incorporate into contractual arrangements with employees and contractors – to include terms of employment, skills, dismissal, discrimination, harassment, violations, human rights, forced and child labour, wages and social leave/benefits, health & safety and bribery and corruption	Ensure contractors are aware of EDPR corporate requirements, and these are fully enforces	Best practice  Legislative compliance	Internal resources	During construction and maintenance	Summary of actions and any none compliance events in annual report
4	Obtain environmental decision for the Pawłowo-Budzyń wind farm	Conduct all actions necessary to complete environmental impact assessment of the project. Provide the authorities with necessary clarifications if needed.	Achieve project compliance with legal requirements. Identify and address environmental issues.	Legislative.	External consultant, own resources	Upon completion of the EIA procedure	Environmental decision for the project.  Report to Lenders on permit and implementation of any regulatory requirements
5	Obtain environmental decision for “Budzyń” substation and	Apply for environmental decision when conceptual design is ready and	Achieve project compliance with	Legislative.	External consultant, own	Upon completion of	Environmental decision for the development.

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	power line connection with Sypniewo substation	environmental and social impacts are identified and properly assessed. Include in the application an assessment underground cabling between the substation and wind turbine generators.	legal requirements. Identify and address environmental issues.		resources	the EIA procedure	Report to Lender on permit and implementation of any regulatory requirements
6	Obtain environmental decision for the new 110 kV power transmission line between Sypniewo Substation and Piła Krzewina station	Undertake detailed analysis of potential routes of additional PTL with particular attention paid to adverse impact of the line on the adjacent Natura 2000 area. Perform nature inventories. Identify and address all environmental and social issues. Apply for the environmental decision. Provide the authorities with all necessary clarifications.	Achieve project compliance with legal requirements. Identify and address environmental issues.	Legislative	External consultant, own resources.	Upon completion of the EIA procedure	Environmental decision for the development. Report to lenders.

7	<p>Install bird markers on the existing 110 kV overhead power line. Install bird marking devices, based on independent ornithological advice on all overhead lines that serve the wind farm that traverse the Notes Rivert/Natura 2000</p> <p>Markers should be installed on overhead lines in the area where they go over Nature 2000 area – Valley of river Notec.</p>	<p>Following requirements of the environmental decision granted to development of a 110 kV overhead power line, install warning coils for birds at a line section which crosses the Noteć river valley.</p> <p>Ensure conductor spacing on transmission line is sufficient to prevent electrocution by the largest birds expected to be present, or otherwise eliminate possibility of electrocution.</p>	<p>Reduce a risk for birds mortality at the migration corridor.</p>	<p>Requirement of the environmental decision for HVL.</p> <p>Best practice</p>	<p>External resources</p>	<p>As early as possible, on the existing line by the end of 2013 the latest.</p>	<p>marker installation completion report.</p> <p>Present the report to the Lenders.</p>
8	<p>Appoint an independent ornithological and bat expert to review monitoring reports and assist EDPR as required,.</p>	<p>The independent advisor will review the monitoring reports done for EIA studies and any other studies required under the ESAP or regulatory requirements. This will include a review of:</p> <ul style="list-style-type: none"> <li>- methodologies for seasonal bird and bat monitoring.</li> <li>- suggestions made by specialists</li> <li>- review monitoring results and cumulative data, to determine (a) need for additional mitigation measures if there are unacceptable impacts, (b) need for continuing seasonal monitoring for another year.</li> <li>-</li> </ul>	<p>Need to have independent advice to review documents and assist with any monitoring and reporting, as well as evaluation of reports.</p>	<p>Best practice</p>	<p>External costs, This can be a part time position/consultant.</p>	<p>Appoint for duration of operation.</p>	<p>AS part of annual report summary of actions and recommendations as appropriate.</p>

9	Monitoring of impacts on birds and bats after each part of the project is operational	Conduct post-construction monitoring on the wind farms impact on birds and bats in a period stated in the environmental decisions, but not shorter than three years.	Base knowledge on environmental impact of the investment.	Best practice	External resources, use assistance of recognizable ornithological and bats experts	5 years after completion of each part of the project or as stated in environmental decisions.	Assess actual impact of the Project on birds and bats, identify room for improvement. Present reports to the Lenders.
10	Monitoring of environmental impacts after Project completion - noise impact.  If elevated noise then develop a mitigation action plan to ensure compliance	Conduct noise impact measurements after completion of the Pawłowo-Gołańcz and Pawłowo-Budzyń projects. This will include a cumulative assessment, if required.	Base knowledge on environmental impact of the investment.	Best practice, requirements of the decisions on environmental conditions for investment approvals	External resources. Use service of accredited company.	Within a year after project completion or longer, if required by environmental decisions	To evaluate the actual noise impact of the Project and assure the noise standards at the protective areas are not breached. Report to Lenders.
<i>Actions to improve EHS issues and stakeholder engagement management</i>							
11	Environmental and health and safety management systems  Implement corporate EHS requirements and polices	Maintain ISO 14001 and OHSAS 18001 management systems. Obtain certification for Pawłowo projects.  Fully implement the corporate ESAP as agreed with EBRD under the Margonign 1 investment	Systematic approach management of EHS issues.	Best practice	Own resources/external support	During the project lifetime.	Report to lenders
12	Monitoring of the project	Maintain current organization of the project monitoring on environmental and social issues, including birds and bats and other environmental impacts.	Further improvement of Project development control.	EBRD PRI Best practice.	Own resources.	During the project lifetime	Fill compliance with PRI. Report to the Lenders.
13	Stakeholders engagement	Continue implementation of SEP and stakeholder engagement. Summarize activity on an annual basis.	Systematic approach to stakeholders engagement.	Best practice	Own resources	During the project lifetime.	Present the annual report on environmental and social issues on the web page.  Publish SEP and NTS on web site  Present reports to the

							Lenders.
14	Stakeholders engagement	Publish on the company website information on social actions undertaken by the company aimed at popularization of renewable energy and building-up a pro-ecological awareness among the society.	Development of environmental awareness of the society.	Best practice	Management time	Continuously, during the project lifetime.	Report to Lenders.
15	Performance audit	Conduct a regular audit (every 3 years) of the wind farm and the further phases of the Project (Pawłowo wind farms)	Improvement of the environmental management.	Best practice	Own resources/external consultants	Every 3 years – first audit 2016.	To reduce environmental and social risk. Present reports to the Lenders