

Stakeholder Engagement Plan

EDPR Solar Photovoltaic Plants, Romania

December 2012



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1 Introduction

1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) developed by EDP Renewables (EDPR) Romania describing the key stakeholders and the information and communication plans intended in regard to the development of eight Solar Photovoltaic Plants in southern and southwest 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 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 EDPR 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 EDPR (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 EDPR with regards to the Photovoltaic Plants.

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 description, location of the site and key environmental and social issues;
- Chapter 3 – Identification of stakeholders and other affected parties;
- Chapter 4 – Overview of existing stakeholder 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

Eight sites have been chosen for construction and operation of Solar Photovoltaic Plants in southern and southwest Romania. The total generating capacity will be 65 MW and individual plants will range between 4.1 MW and 12 MW. The Cujmir, Dabuleni, Grojdibodu and Vanju Mare projects are currently under construction and the Burila Mica, Gruia, Bailesti and Dobrosloveni projects are due to start construction in March 2013.

The key benefit of this project is the use of reliable solar photovoltaic technology which will achieve significant greenhouse gas emissions (GHG) savings as opposed to the use of power generation plant using fossil fuels.

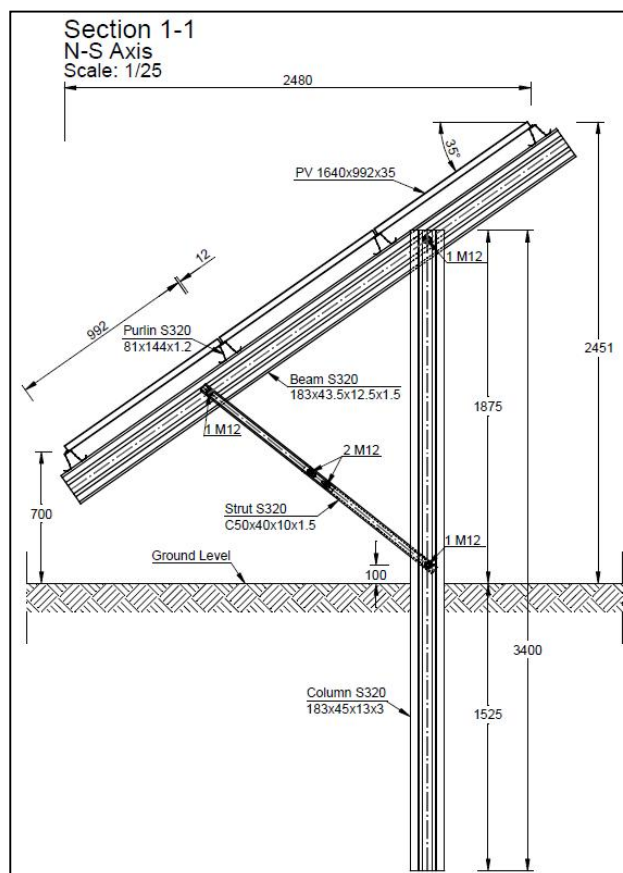
The photovoltaic module model is RNV 245 – 245 Wp and is produced by Suntech Power Spain. The modules will be constructed in rows of seven to 30 blocks of 21 panels. Each row shall be connected to a separate inverter. The assumed inverter model is Power One 330TL with a nominal power of 330kW AC. An example layout of the solar panels is shown in Figure 1.

Figure 1 An example layout of the solar panels



The set-up of the Photovoltaic structures is shown in Figure 2. The panels are set at a fixed tilt of 35° and are static. The panels will be bolted metal structures which will themselves be bolted together and anchored by piles that extend about two meters into the ground.

Figure 2 Set-up of the Photovoltaic Structures



The lighting on the sites will be directed inward towards the solar arrays and controlled by infra-red motion detectors. The Burila Mica site will require a short overhead line connection and all other electrical connections will be buried underground. A three-meter high fence will be constructed around each of the project sites (see Figure 3).

Figure 3 Example of the type of fence that will surround the project sites

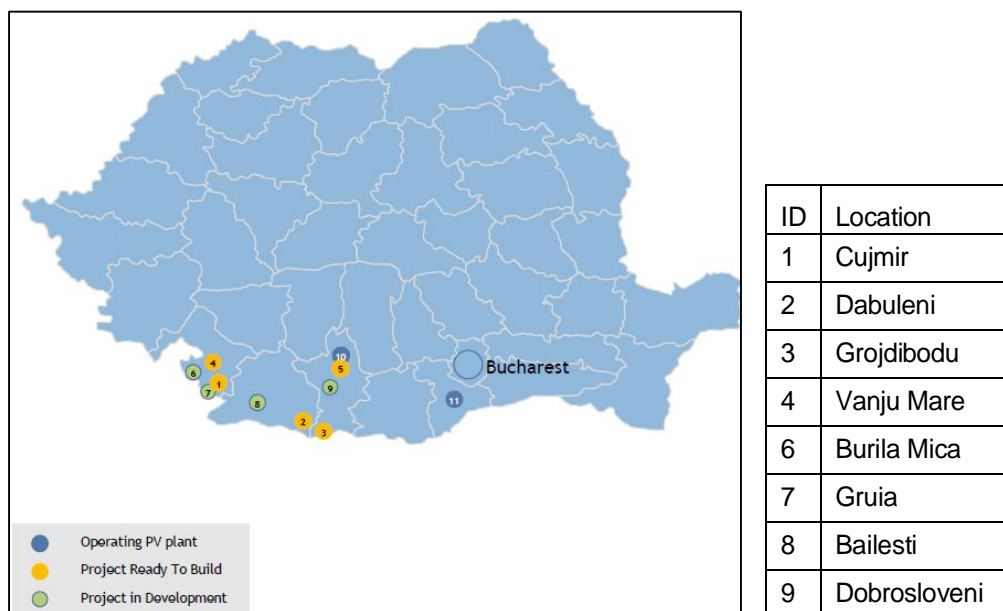


Applications for Construction Authorisations and environmental permits (in line with Romanian legal requirements) are complete or in progress.

2.2 SITE SETTING AND LOCATIONS

The sites are located within the counties of Mehedinți (four), Dolj (two) and Olt (two) (shown in Figure 4, sites 10 and 11 which are already in operation are not included in this project). None of the new Project sites are in operation.

Figure 4 Locations of the Proposed Solar Photovoltaic Plants



The majority of the sites are located in areas where landscape and visual impacts will be minimal. Where residential properties are nearby, the land between houses and solar sites and the presence of existing structures should limit any objections due to visual impact.

The Cujmir, Grojdibodu, Burila Mica and Bailesti sites will require the construction of an access road, but all others will be served by existing roads.

No archaeological or cultural heritage sites were identified at any of the locations. No water features were identified and there are no drainage or flood risks.

All of the sites are current or former agriculture fields with no or very limited vegetation and consequently have low ecological value. The majority of the sites have no ecologically designated areas in close proximity. Two of the sites, Burila Mica and Gruia, are located within areas designated by Romania protection under Natura 2000 (ROSPA0011 Blahnița and ROSCI0306 Jiana respectively). However, it is considered that the proposed solar farm developments will not significantly impact upon these areas, particularly with the adoption and implementation of good construction practices.

2.3 CONSULTATION AND DISCLOSURE

Information disclosure undertaken by EDPR 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).

Stakeholder engagement is an essential part of a well-managed project that is used when there is a major change to a facility or for implementation of an investment project that may have an impact on or be influenced by people and organisations, the stakeholders. It helps to mark out all the important connections between the various stakeholders, in order to improve communications and obtain wider community support

for projects. It is key in gathering useful information and ideas to successfully manage the risks and impacts and provides for more sustainable decision making.

EDPR will publicly disclose relevant information in the form of factsheets to inform stakeholders. A grievance mechanism will be set up to provide a process that seeks to understand the needs, concerns and issues of the stakeholders which will be used to inform decisions on how to minimise negative and maximise positive environmental and social impacts.

General Stakeholder Communication Records Maintenance

All communication records will be maintained by EDPR, clearly logging the key information provided to stakeholders and also the key incoming communications (i.e. general questions, complaints etc.) relating to the Solar Photovoltaic Plants along with a summary of actions taken.

As part of this communications procedure, EDPR will record and update all 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.

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 EDPR's Photovoltaic Plants undertakes.

Any person who has an interest can seek information from the company. Please contact:

Contact: EDPR

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 21 204 03 07

Fax: +40 21 201 08 92

3.2 STAKEHOLDERS APPROACHED DURING THE DEVELOPMENT OF THIS PLAN

All the key stakeholders identified and approached 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> | EBRD – London HQ <i>One Exchange Square, London EC2A 2JN, United Kingdom, Switchboard: +44 20 7338 6000</i> | <i>EHSS best practice</i> <i>Environment and Social Action Plan (ESAP)</i> |
| | EBRD – Romania, Bucharest Office <i>Metropolis Center, 56-60, Lancu de Hunedoara Bd. Rd Floor, West Wing, Sector 1, Bucharest.</i> SUNTECH POWER SPAIN <i>Edificio « Cuzco IV » - 28046 Madrid, España</i> | <i>Solar PV panels supplier</i> |
| <i>Government (Romanian state/territory and local)</i> | County Council MEHEDINTI County Council DOLJ County Council OLT | <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> |
| | City Hall Cujmir City Hall Burila Mica City Hall Gruia City Hall Vanju Mare City Hall Bailesti City Hall Dabuleni City Hall Dobrosloveni City Hall Grojdibodu | <i>Local Public Administration authority at local level</i> |

| Stakeholder Groups | Key Stakeholders | Summary of Specific Interest |
|---|---|--|
| | <p>National Environmental Protection Agency, Bucharest</p> <p><i>Splaiul Independentei, nr.294, Sector 6, București, 060031</i></p> <p><i>Phone: +40 (0) 21-207.11.01; +40 (0) 21-207.11.02 Fax: +40 (0) 21-207.11.03</i></p> <p><i>Web: http://www.anpm.ro/ Email: office@anpm.ro.</i></p> <p>Local Environmental Protection Agency, Mehedinti</p> <p>Local Environmental Protection Agency, Dolj</p> <p>Local Environmental Protection Agency, Olt</p> <p>CEZ Distribution</p> <p><i>Street Brestei 2, etaj 6, 200581, Craiova, judetul Dolj</i></p> <p><i>Fax: +40 (0)251 215 004</i></p> <p><i>Web: www.cez.ro</i></p> <p><i>E-mail: office@cez.ro</i></p> | <p><i>National Environmental Protection Authorities</i></p> <p><i>Local Environmental Protection Authorities</i></p> <p><i>Energy production, distribution</i></p> |
| Advisory / Non-government Organisations | <p>Societatea Ornitologica Romana (SOR)</p> <p><i>Bd. Mihail Kogălniceanu, nr.49, Sc. A Etaj 1 Ap. 8 Cod 050108, Sector 5, București</i></p> <p><i>Phone.: +40 (0)31 425 56 57 Fax: +40 (0)31 425 56 56</i></p> <p><i>Web: http://www.sor.ro</i></p> <p>World Wide Fund Romania</p> <p><i>WWF Programul Dunăre-Carpați România</i></p> <p><i>Ioan Caragea Vodă street, nr. 26, Corp A Sector 1, 010537.București,</i></p> <p><i>Phone: +40 (0)21 317 49 96 Fax: +40 (0)21 317 49 97</i></p> <p><i>Web: http://romania.panda.org/</i></p> <p><i>e-mail: office@wwfdcp.ro</i></p> | <p><i>Expertise on birds, protected area administrator (ROSPA0011 Blahnița, ROSPA0046 Gruia-Garla Mare)</i></p> <p><i>Expertise on birds, protected area administrator (ROSPA0011 Blahnița, ROSPA0046 Gruia-Garla Mare, ROSCI0306 Jiana)</i></p> |

| Stakeholder Groups | Key Stakeholders | Summary of Specific Interest |
|---|--|--|
| <i>Operational suppliers, clients and client representation</i> | 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> | Internal Employees | <i>Internal training Employment and social policy & procedures</i> |
| <i>Public groups</i> | Local communities - Council Members of Cujmir, Bailesti, Burila Mica, Dabuleni, Dobrosloveni, Grojdibodu, Gruia, Vanju Mare and other Villages | <i>Local communities Noise Land use and construction traffic</i> |
| <i>General communities</i> | Residents of Cujmir, Bailesti, Burila Mica, Dabuleni, Dobrosloveni, Grojdibodu, Gruia, Vanju Mare and other Villages | <i>Noise Land use and construction traffic</i> |

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 EDPR Stakeholder Relations

4.1 OVERVIEW OF EXISTING STAKEHOLDER AND COMMUNITY RELATIONS

With respect to the EU EIA Framework Procedures and Romanian law governing environmental impact assessment, the Photovoltaic Plants should have no significant adverse impacts that cannot be prevented or reduced to acceptable levels.

As such, the short Environmental Impact Assessment procedures were followed and, therefore, no public consultations / debates were required by the competent Environmental Protection Agencies. However, the following communications were mandatory and have been undertaken:

- a) Announcements outlining the request by EDPR for environmental agreements. Published in local newspapers, at local Council headquarters and at competent EPA offices.
- b) Announcements regarding the screening decisions issued by EPAs. Published in local newspapers, at local Council headquarters and at competent EPA offices.

The contractors responsible for road access have contacted local councils. The Cultural Departments of the Local Authorities were contacted in relation to any aspects of cultural heritage in the proximity of the sites.

At all stages of the project, EDPR has consulted with the authorities to apply to obtain the necessary certificates and permits to construct, operate and sell power to the grid and commits to do so for all future expansions. These include:

- Environmental agreements;
- Natura 2000 permit;
- Public Health permit;
- Civil Defense permit;
- Urban certificate;
- Location permit;
- Building permit;
- Fire Security permit;
- Water Authority permit;
- ATR for internal services and production; and
- DRDP permit.

5 Stakeholder Engagement Programme

5.1 DISCLOSURE OF INFORMATION

The Types of Information to be Disclosed

Information will be disclosed at each stage of the projects as outlined in Table 2. Newsletters and factsheets detailing timescales and project information, such as, size layout, benefits and impacts will be produced. They will be displayed at local mayors' offices, on or near to project sites, local villages in City Halls and on the EDPR website.

The Methods of Communication

The types of information disclosed and the specific methods of communication to be undertaken by EDPR for the Solar Photovoltaic Plants 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.

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

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

Also at the following:

EDPR Romania Office

Rosetti Tower Office Building
Maria Rosetti st 6, 3rd floor
Sector 2, Bucharest
Romania
Tel. +40 21 204 03 07

Contact

Ms Laura Lazar
Engineering, Construction and Environment EDPR
E-mail: LauraLazar@edpr.com
Tel: +40 21 204 03 07
Fax: +40 21 201 08 92

EDPR 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

| Project Phase | Type of information disclosed | Locations and dates of meetings / forms of communication | Stakeholder Groups Consulted |
|--|--|--|--------------------------------------|
| Design and authorisation to proceed with project | Notification of project design. Confirmation that necessary permits and authorisations have been obtained to start construction. | Once planning approval has been obtained. Newsletters displayed in Competent Local Authorities, City Halls and State Inspectorate Construction. | Local Communities County Councils |
| Start / duration of construction | Specific project details (notification that it is a construction site, image – representative of the type of construction performed, name and address of the site, Beneficiary – name, address, contact, general designer – name, address, contact, Constructor – name address, contact, Building permit number, Issued by..., Construction period as specified on the building permit, Start and end date of construction). | Two weeks prior to start of construction. Information boards displayed on the intersection of access roads with main roads, in Competent Local Authorities, City Halls and State Inspectorate Construction. | |
| End of construction | Notification of completion of construction activities and expected operational phase start date. | One week before construction activities end. Newsletters displayed in Competent Local Authorities, City Halls and State Inspectorate Construction. | |
| Operational | Project details (Park name, owner and contact information). | During operational phase. Contact information displayed on board close to the projects, in Competent Local Authorities, City Halls and State Inspectorate. Factsheets referenced in all | |

| Project Phase | Type of information disclosed | Locations and dates of meetings / forms of communication | Stakeholder Groups Consulted |
|---------------|-------------------------------|---|------------------------------|
| | | information and available to all Stakeholders in annual report and on EDPR website. | |

5.3 MONITORING, REPORTING AND FEEDBACK MECHANISMS

As the short Environmental Impact Assessment procedures are applicable to these projects there is no regulatory requirement to provide monitoring, reporting and feedback mechanisms, however, EDPR will implement a grievance mechanism for each project as outlined in Section 5.4.

5.4 GRIEVANCE MECHANISM

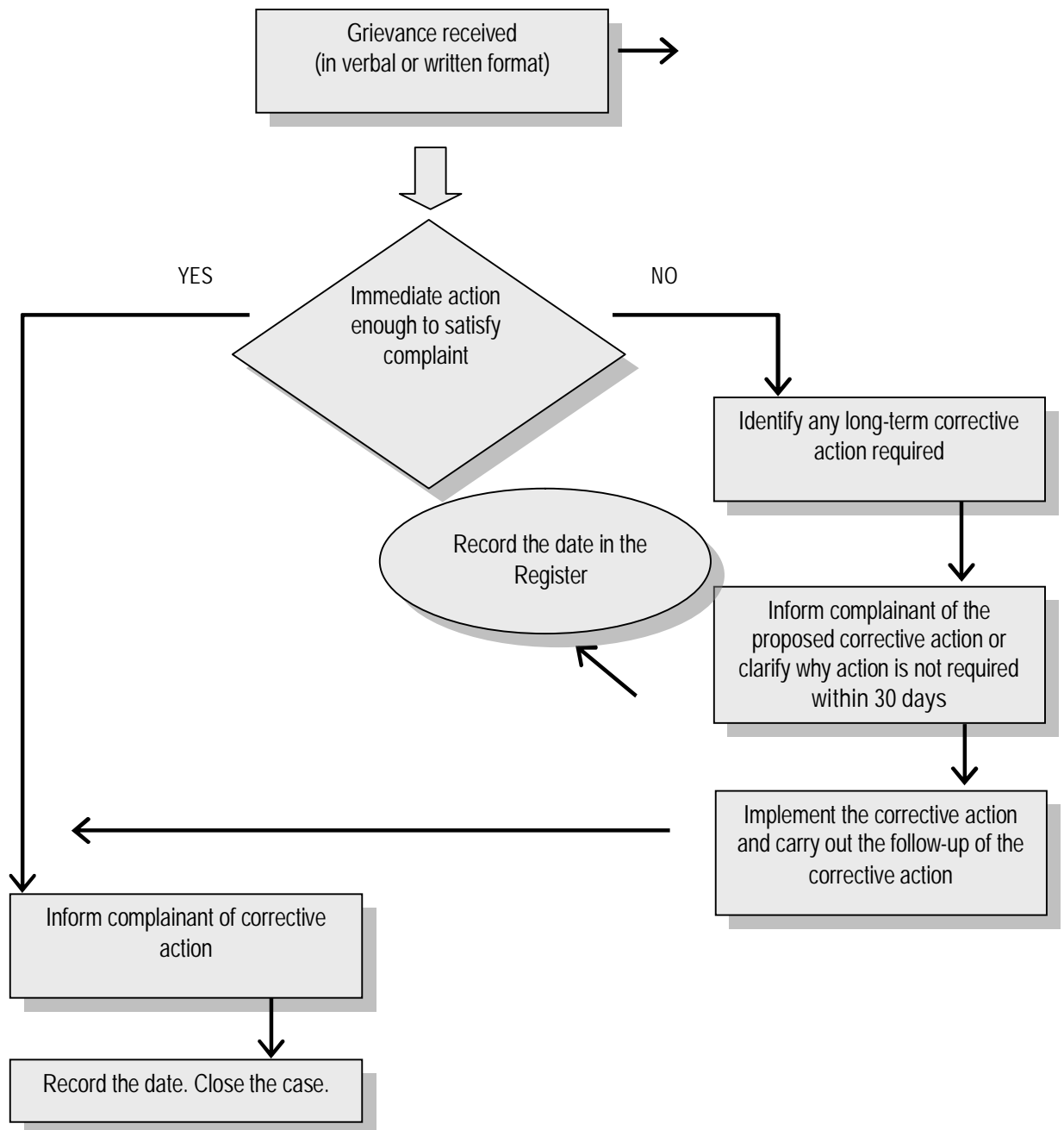
A grievance mechanism has been adopted as presented in Figure 3 in which the grievance form presented below will be used as required to handle grievances from non-employees. The forms have been given to all the main construction contractors and can be obtained from the offices at the project sites. The forms can also be requested from Laura Lazar at EDPR using the contact details provided earlier in this document.

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 and send acknowledgement to complainant within 5 working days;
- 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, by telephone or by email. Contact details should be provided with the preferred method and language of communication. Anonymous grievances can be submitted and will be actioned by EDPR though a follow up response is not possible. A clear description should be provided of the incident or grievance. EDPR 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

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

E-mail: Lauralazar@edpr.com

Phone: +40 21 204 03 07