

Stakeholder Engagement Plan

Cobadin Wind Farm, Romania

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1 Introduction

1.1 BACKGROUND

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

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that EDP Renewables (the owner of Cobadin 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 subject 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 (Environment & Sustainability) at EDP Renewables (contact details provided above) 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 EDP Renewables for the Cobadin 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 Cobadin wind farm comprises 13 wind turbines (turbine model VESTAS V90 2.0MW), providing a total power of 26 MW. 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), fitted with two integral transformer stations (at 690V to 33,000V) within the turbine nacelle. The turbines are connected, through 33kV 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 Enel Dobrogea facilities.

The total area occupied by the wind farm is ~200 ha, from which ~ 3,3 ha are affected by wind farm construction (internal roads, foundations, platforms of wind turbines, electrical substation 33/110 kV). 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 Cobadin is shown on Figure 1.

The 13 2MW wind turbines associated with the Cobadin Wind Farm have already been constructed. The wind farm was connected to Enel Distribution Company on 30.01.2013. The wind farm is estimated to become fully operational on May 2013, after finishing mandatory compliance tests. The procedure for obtaining the environmental authorization (EA) was started. Estimative issuance date of EA: Mid of April 2013.

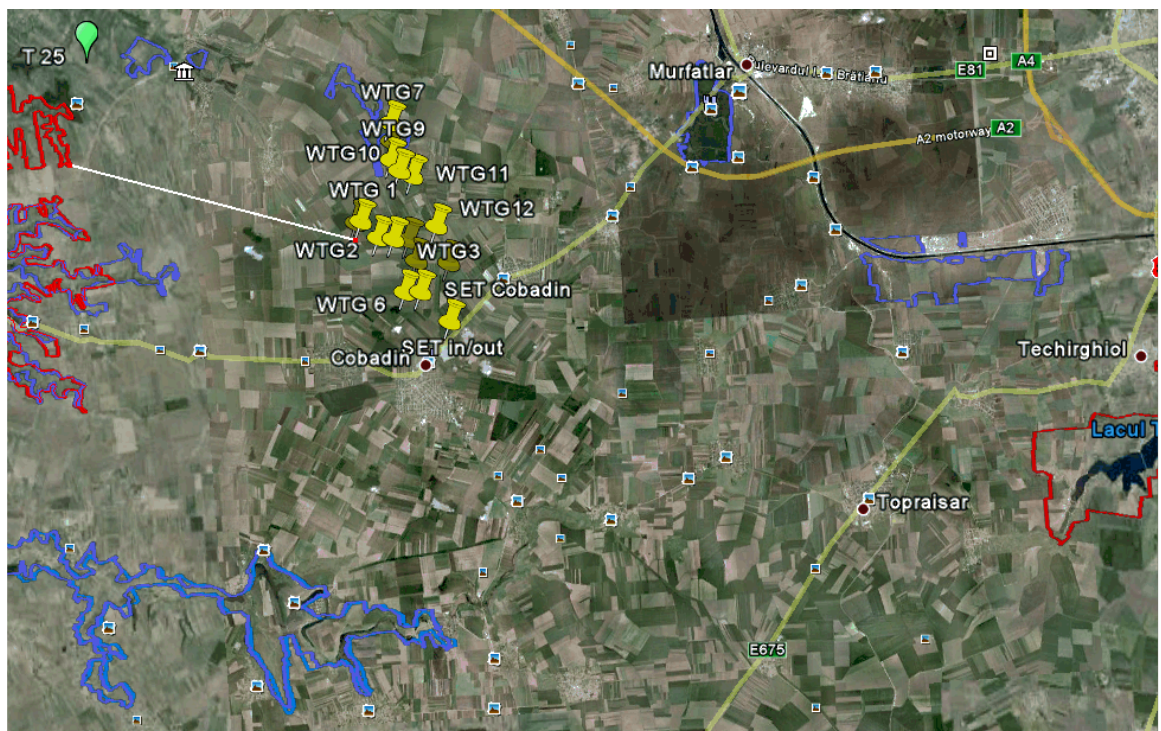


Figure 1: Cobadin Wind Farm Turbine Layout Plan

2.2 SITE SETTING AND LOCATION OF THE WINDFARM

The Cobadin wind farm is located within Dobrogea area, and is approximately 3 km from Ciocarlia and Cobadin localities, as shown on Figure 2. These localities are rural in character and are situated along water courses, roads and farmland.

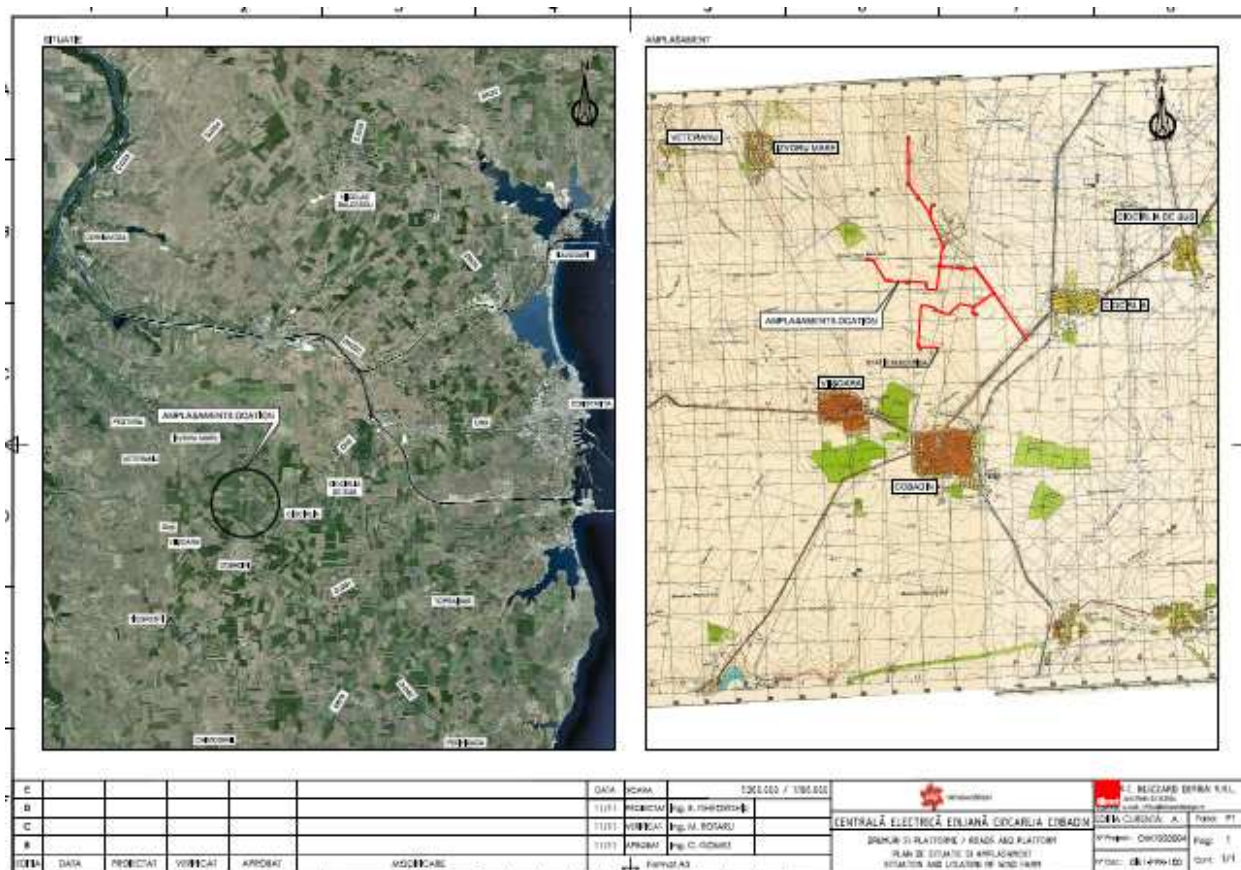


Figure 2 Cbadini Wind Farm Setting and Context

The Site covers an area of ~200 ha and is on land which is privately owned by EDPR. 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.

The access is made using County Road DJ3.

The Cobadin 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).

The distances of Cobadin WF to Natura 2000 areas are:

- ROSCI0071 Dumbraveni-Valea Urluia-Lacul Vederosa: 11 km from WTG 6
- ROSCI0353 Pestera Deleni: 7 km from WTG 1; 0.5 km from WTG 7, 8 and 9
- ROSCI0083 Fantanita Murfatlar 10.79 km from WTG 13
- ROSCI0398 Straja Cumpana 16.7 km from WTG 13
- ROSPA0061 Lacul Techirghiol 26 km from WTG 6
- ROSPA0001 Adamclisi 12 km from WTG 1

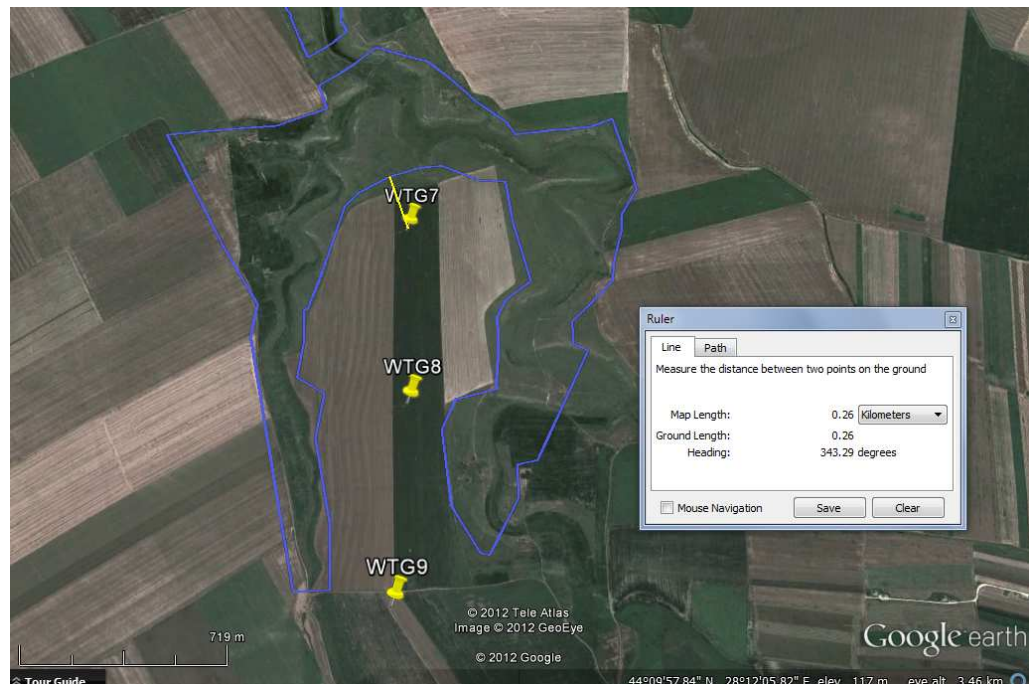


Figure 3. Cobadin Wind Farm distances to Natura 2000 areas

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 **International Finance Corporation (IFC)**.

National Legislation Requirements

EDP Renewables consulted with the authorities to determine if an EIA was required for the development of Cobadin Wind Farm. For Cobadin WF it was obtained the Environmental Agreement no 22/08.07.2011 following full procedure according with EIA legislation in force:

- Governmental Decision GD 445/2009 regarding the EIA framework procedure, projects can be classified as category A with significant environmental impact (Annex 1 of GD 445/2009) and B insignificant environmental impact (Annex 2 of GD 445/2009).

For the projects listed in Annex 1 (full procedure), in order to obtain the Environmental Agreement it is mandatory to elaborate an EIA report and conduct public debates with local community and other relevant stakeholders (EPA, Environmental Guard, NGOs, etc). After this step, it is mandatory to assure a disclosure period of EIA report for public comments. If no complains are registered, the competent EPA will issue the Environmental Agreement.

For facilitating the process, one EIA procedure was opened for Cobadin containing following works:

- construction of Wind Farm (civil works, substation and wind turbines installation)
- construction of High Voltage Line and Connection Works to Electrical Distribution Network

International Finance Corporation (IFC) Requirements

Stakeholder engagement is an integral part of IFC Performance Standard 1, which requires that a Stakeholder Engagement Plan (SEP) be developed for all projects with adverse impacts on local communities, commensurate to the risks and impacts of the project concerned. Disclosure of

relevant project information is required to help Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. IFC clients are required to provide Affected Communities with access to relevant information on the purpose, nature, and scale of the project; the duration of proposed project activities; any risks to and potential impacts on such communities and relevant mitigation measures; the envisaged stakeholder engagement process; and a Grievance Mechanism.

A consultation process is required to provide Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allow the client to consider and respond to them.

The client will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. If clients have already engaged in such a process, they will provide adequate documented evidence of such engagement. The client will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.

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 Cobadin 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 Cobadin 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 organizations 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 organization 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 recognized 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 Cobadin 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 – Environment & Sustainability

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

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

- County Council Constanta;
- Local Council Cobadin
- Local Council Ciocarlia;
- Societatea Ornitologica Romana (SOR);
- National Environmental Protection Agency, Bucharest;
- Environmental Protection Agency Constanta;
- Local communities – Cobadin and Ciocarlia Council Members and local residents.

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

Stakeholder Groups	Key Stakeholders	Summary of Specific interest
Government (Romanian state/territory and local)	<ul style="list-style-type: none"> ■ County Council Constanta Tomis Avenue, no.51, Constanta, 900725 , Constanta County Phone: +40 (0) 241 708.404, Web: http://www.cjc.ro/ Email: consjud@cjc.ro 	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
	<ul style="list-style-type: none"> ■ Local Council Cobadin Primaverii Street, no. 2, Cobadin Village , Constanta County Phone: +40 (0)241.855.129 	Local Public Administration authority at local Level
	<ul style="list-style-type: none"> ■ Local Council Ciocarlia 1 Decembrie Street, no. 54, Ciocarlia Village, Constanta County Phone: +40 (0) 0241.875.555; +40 (0) 0241.875.539 	Environmental Protection Authorities
	<p>National Environmental Protection Agency, Bucharest</p> <p>Splaiul Independentei, nr.294, Sector 6, București, 060031 Phone: +40 (0) 21-207.11.01; +40 (0) 21-207.11.02 Fax: +40 (0) 21-207.11.03 Web: http://www.anpm.ro/ Email: office@anpm.ro</p> <ul style="list-style-type: none"> ■ Constanta County Environmental Protection Agency Unirii Street, no. 23, Constanta, Constanta County Phone: +40 (0) 241.546.596; +40 (0)241.546.696; Fax: +40 (0)241.543.717 Web: http://apmct.anpm.ro E-mail: office@apmct.anpm.ro 	Environmental Protection Authorities
Advisory / Non-government Organisations	<ul style="list-style-type: none"> ■ Societatea Ornitologica Romana (SOR) Bd. Mihail Kogalniceanu, nr.49, Sc. A Etaj 1 Ap. 8 Cod 050108, Sector 5, Bucuresti Phone.: +40 (0)31 425 56 57 Fax: +40 (0)31 425 56 56 Web: http://www.sor.ro 	Expertise on birds
Internal stakeholders	<ul style="list-style-type: none"> ■ Internal Employees 	Internal training

Stakeholder Groups	Key Stakeholders	Summary of Specific interest
<i>(Employees, labour unions)</i>		<i>Employment and social policy & procedures</i>
<i>Public groups</i>	■ Local communities - Council Members of Cobadin, Ciocarlia	<i>Local communities</i> <i>Noise</i> <i>Land use and construction traffic</i>
<i>General communities</i>	Residents of Cobadin, Ciocarlia	<i>Noise</i> <i>Land use and construction traffic</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.

In May 2011, a public consultation meeting was conducted by EDP Renewables in Ciocarlia Local Council Headquarters, which was attended by members of the local communities, 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.

Consultation meetings were held with Constanta County Council, representatives of Ciocarlia and Cobadin Local Councils and 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 Constanta EPA (No. 22 dated 08.07.2011);
- Urban certificate;
- Building permit from Constanta County Council (No. 31 dated 30.09.2011)

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

IFC 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 Cobadin Wind Farm site on an ongoing 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.

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 Cobadin Wind Farm site are summarized 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 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 21 204 03 07

Fax: +40 21 201 08 92

Contact

Ms Laura Lazar

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City Hall Ciocarlia

1 Decembrie Street, no. 54

Ciocarlia Village,

Constanta County

Tel: +40 (0) 0241.875.555

Fax: +40 (0) 0241.875.539

In addition, this Stakeholder Engagement Programme (SEP) are also included 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.

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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: - ESAP status - Resolution on grievances - Power generation.	Disclosure to investors
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: ■ 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 when wind farm becomes operational and the Environmental License is obtained	Disclosure to 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.

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

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

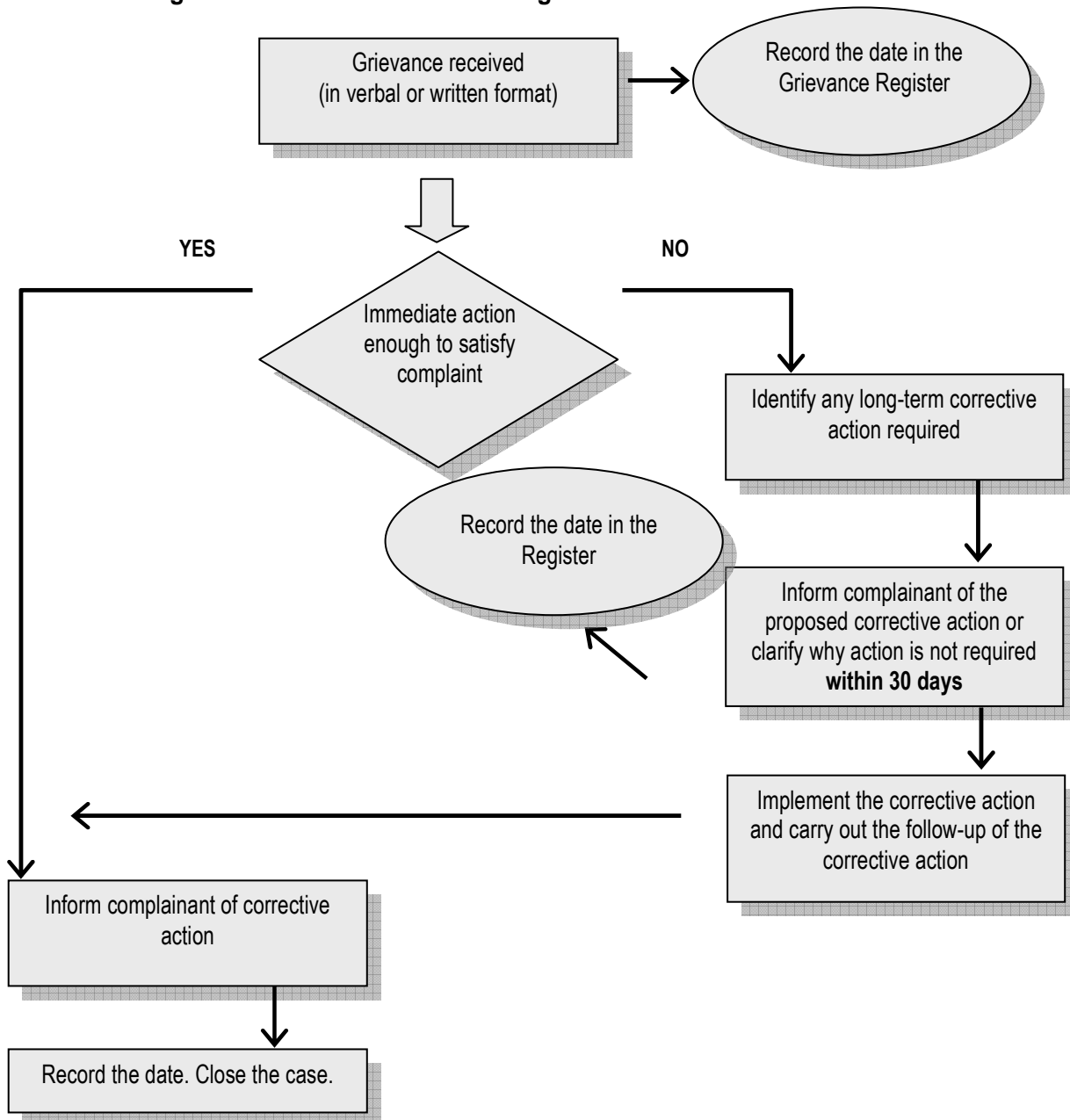
5.4 GRIEVANCE MECHANISM

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 nonemployees. 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).	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, Environment & Sustainability
 Edp Renewables,

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

E-mail: LauraLazar@edpr.co