Stakeholder Engagement Plan

Facaeni Wind Farm – Phase I, Romania

October 2014



Issue/revision	lssue 1	Revision 1	Revision 2	Revision 3
Remarks	Draft	Final		
Date	October 2014			

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

Name: Laura Lazar E-mail: LauraLazar@edpr.com Tel: +40 212 010 890 Fax: +40 212 010 892

Name: Florentina Fasie E-mail: Florentina.Fasie@edpr.com Tel: +40 212 010 890 Fax: +40 212 010 892

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1 Introduction

1.1 BACKGROUND

This document is a **Stakeholder Engagement Plan (SEP)** for Facaeni Wind Farm – Phase I, Ialomita 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 through Ialomita Power SRL (the owner of Facaeni 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 and Florentina Fasie (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 Facaeni Wind Farm - Phase I 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

Facaeni Wind Farm – Phase I comprises 44 wind turbines (turbine model VESTAS V112 - 3 MW), providing a total power of 132 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 175 m (comprising 119 m tower and 56 m rotor blade above the tower height), fitted with an integral transformer station (at 690V to 33,000V) within the turbine nacelle.

The wind farm is connected to Gura Ialomitei electric station 400/110/20 kV through an overhead wired section 400 kV, followed by an underground wired section of 400 kV. The evacuation of power from the two transformer stations: Movila 33/110 kV and Facaeni 33/110/400 kV is done by means of an underground electric line of 110 kV.

The total area occupied by the wind farm, related with the two phases of the project, is ~539,72 ha, from which ~32,27 ha are affected by wind farm construction (access roads, foundations, platforms of wind turbines, 2 electrical substations). 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 Facaeni Wind Farm – Phase I is shown in the Figure 1.

The Environmental Authorization for the first phase of Facaeni Wind Farm was issued by Environmental Protection Agency (EPA) Ialomita on 11.08.2014. First phase of 132 MW was energized on 25.09.2014. Currently Facaeni wind farm is in testing period and it will become fully operational in December 2014.



Figure 1. Facaeni Wind Farm Phase I - Turbine Layout Plan

2.2 SITE SETTING AND LOCATION OF THE WIND FARM

Facaeni Wind Farm is located within lalomita area, near the villages: Giurgeni, Facaeni, Vladeni and Mihail Kogalniceanu as shown in Figure 2. These localities are rural in character and are situated along water courses, roads and farmland.

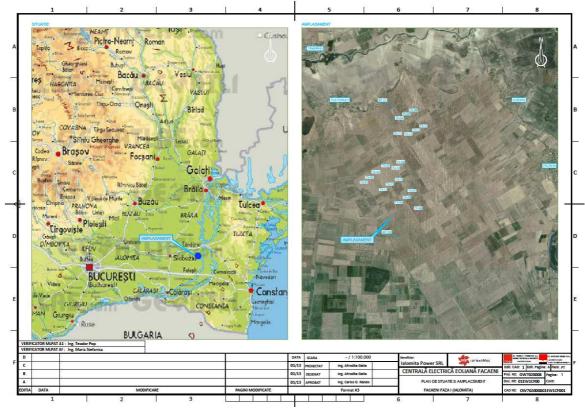


Figure 2. Facaeni Wind Farm Setting and Context

The Site covers an area of ~539,72 ha and is on land on which lalomita Power SRL has rights of use, easement, superficies and also private lands. 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 from Bucharest, on A2 Highway to Fetesti city, then on DN3B national road to Vladeni locality.

Regarding the natural protected areas, including Natura 2000 sites, only the Overhead and the Underground section 400 kV is crossing 4 Sites of Community Importance (SCIs) and Special Protected Areas (SPAs) as follows:

- ROSCI0278 Bordusani-Borcea (crossed by the 400 kV overhead line on a distance of about 1,82 km),
- ROSCI0290 Coridorul Ialomitei (crossed by the 400 kV overhead line on a distance of about 1,14 km),
- ROSPA0017 Canaralele de la Harsova (crossed by the 400 kV overhead line on a distance of about 1,1 km),

 ROSPA0120 Kogalniceanu-Gura lalomitei (crossed by the 400 kV overhead line on a distance of about 4,80 km and continued with the Underground line 400 kV on a distance of 1,61 km).

Also the Underground line 400 kV is located near other 2 protected areas: ROSPA0111 Bertestii de Sus-Gura Ialomitei at ~1 km north distance and ROSCI0389 Saraturile de la Gura Ialomitei-Mihai Bravu at a distance of about 0,40 km north.



Figure 3. Facaeni Wind Farm location in relation with the natural protected areas

During construction works of the Overhead line 400 kV monitoring activities of vegetation and avifauna were performed in the period July – December 2013.

Regarding vegetation monitoring, the species identified within Facaeni WF are not protected, rare or species of community interest. Most of the taxa are represented by common wild species, species associated with crops or ruderal lands. The list of taxa identified contains a number of 98 species and subspecies.

The implementation of Facaeni project didn't generate changes regarding the structure and integrity of Natura 2000 sites and the impact on lads and vegetation is insignificant and mostly reversible, except the areas permanently occupied by the wind turbines foundations.

The avifauna monitoring shows a number of 66 birds species identified in the period analyzed. During the Overhead line construction no dead birds were identified, the conservation status of avifauna was generally good and the number of species present in the area studied was not influenced by the line construction.

Also during construction works, in order to respect the condition imposed in the Environmental Agreement issued for Facaeni WF, several measures were implemented to reduce the impact on avifauna:

- Artificial nests were installed on the high voltage poles
- Flagpoles were mounted on the conductors

- "Anti-Storks" devices were installed (groups of spikes mounted on the console above the isolators)



Figure 4. Artificial nests installed on the high voltage poles

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 Facaeni Wind Farm. For Facaeni WF it was obtained the Environmental Agreement no 1/14.01.2013 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.

Also, the legal procedure in order to obtain the Environmental Authorization for the project was followed, according with Order no. 1798/19.11.2007 modified by Order no. 1298/28.04.2011 and Order no. 3839/2012.

The required documentation was prepared and submitted to EPA lalomita and also to the Local Councils from the area where Facaeni WF is located. The Environmental Authorization for Facaeni WF - Phase I was obtained on 11.08.2014.

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 Facaeni Wind Farm – Phase I 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 Facaeni 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 Facaeni 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 renewable 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 **Address:** Rosetti Tower Office Building, Maria Rosetti st 6, 3rd floor, Sector 2 Bucharest Romania

Name: Laura Lazar – Sustainability E-mail: LauraLazar@edpr.com Tel: +40 212 010 890 Fax: +40 212 010 892

Name: Florentina Fasie – Environment E-mail: Florentina.Fasie@edpr.com Tel: +40 212 010 890 Fax: +40 212 010 892

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 Ialomita;
- Local Council Vladeni;
- Local Council Facaeni;
- Local Council Mihail Kogalniceanu;
- Local Council Giurgeni;
- Societatea Ornitologica Romana (SOR);
- National Environmental Protection Agency, Bucharest;
- Environmental Protection Agency Ialomita;
- Local communities Vladeni, Facaeni, Mihail Kogalniceanu and Giurgeni 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)	 County Council Ialomita Piaţa Revoluţiei Street , no. 1, 920032, Ialomita County Phone: +40 (0) 243 230 200 Web: <u>http://www.cicnet.ro</u> Email: <u>cji@cicnet.ro</u> 	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
	 Local Council Vladeni Mihai Viteazul Street, no. 35, 927250, Vladeni Village, Ialomita County Phone: +40 (0) 243 313 631 Web: http://www.primariavladeniil.ro Local Council Facaeni Principala Street, no. 110, Facaeni Village, Ialomita County Phone: +40 (0) 243 313 330 Web: http://primariafacaeni.ro Local Council Mihail Kogalniceanu Scolii Street, no. 21, 927165, Mihail Kogalniceanu Village, Ialomita County Phone: +40 (0) 243 272 074 Web: http://www.primariamihailkogalniceanu.ro 	Local Public Administration authority at local Level

Stakeholder Groups	Key Stakeholders	Summary of Specific interest
	Local Council Giurgeni	
	Mihai Viteazul Street, no. 36, 927135, Giurgeni Village, Ialomita County Phone: +40 (0) 243 277 010 Web: <u>http://www.qiurgeni.ro</u>	
	National Environmental Protection Agency, Bucharest	Environmental Protection Authorities
	Splaiul Independentei, nr.294, Sector 6, Bucuresti, 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: <u>office@anpm.ro</u> .	
	 Ialomita County Environmental Protection Agency Mihai Viteazu Street, no. 1, Slobozia, Ialomita County Phone: +40 (0) 243 232 971; Fax: +40 (0) 243 215 949 Web: <u>http://apmil.anpm.ro</u> E-mail: <u>office@apmil.anpm.ro</u> 	Environmental Protection Authorities
	 ROMSILVA Petricani Street , no. 9A, District 2, Bucuresti, 023841 Phone: +40 (0) 213 171 005; Fax: +40(0) 213 168 428 E-mail: office@rnp.rosilva.r, biroupresa@rnp.rosilva.ro 	National Forest Administration

Stakeholder Groups	Key Stakeholders	Summary of Specific interest
Advisory / Non- government Organisations	 Societatea Ornitologica Romana (SOR) Hristo Botev Avenue, no.3, Ap. 6, 030231, District 3, Bucuresti Phone.: +40 (0) 314 255 657 Fax: +40 (0) 314 255 656 Web: <u>http://www.sor.ro</u> E-mail: <u>office@sor.ro</u> 	Expertise on birds
Internal stakeholders (Employees, labour unions)	 Internal Employees 	Internal training Employment and social policy & procedures
Public groups	 Local communities - Council Members of Vladeni, Facaeni, Mihail Kogalniceanu and Giurgeni 	Local communities Noise Land use and construction traffic
General communities	Residents of Vladeni, Facaeni, Mihail Kogalniceanu and Giurgeni	Noise Land use and construction traffic

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 November 2013, a conference was organized by EDP Renewables in Ialomita County which was attended by members of the county council, local communities and local authorities, representatives of the Environmental Protection Agency and local press. The presentation was aimed at describing the various stages of the construction and the focus was placed on the environmental, economical and social implications.

Consultation meetings were held with Ialomita County Council, representatives of Vladeni, Facaeni, Mihail Kogalniceanu and Giurgeni Local Councils and Environmental Protection Agency as part of the site permitting procedure.

At all stages of the project, EDP Renewables through Ialomita Power SRL 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 lalomita EPA (No. 1 dated 14.01.2013);
- Urban certificate (No. 6 dated 10.03.2011);
- Building permit from Ialomita County Council for Facaeni WF construction (No. 10 dated 16.04.2013);
- Building permit from Ialomita County Council for connection to the national power grid. (No. 12 dated 19.04.2014);
- Environmental Authorization issued by lalomita EPA (No. 123 dated 11.08.2014)

EDP Renewables is 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 Facaeni Wind Farm – Phase I 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 Facaeni Wind Farm – Phase I 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.edpr.com/

(under the link: http://www.edpr.com/sustainability/documents-library-and publications/)

Also at the following address: **EDP Renewables Romania Office** Rosetti Tower Office Building Maria Rosetti st 6, 3rd floor Sector 2, Bucharest, Romania Tel. +40 21 2040307 Fax: +40 21 201 08 94

Contact

Laura Lazar - Sustainability EDP Renewables E-mail: LauraLazar@edpr.com Tel: +40 212 010 890 Fax: +40 212 010 892 Florentina Fasie - Environment EDP Renewables E-mail: Florentina.Fasie@edpr.com Tel: +40 212 010 890 Fax: +40 212 010 892

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.

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; 	Commence when wind farm becomes operational and the Environmental License is obtained	Disclosure to EPA and SOR.
	 Identification of breeding birds in the area. 		
	Monitoring of species of birds or bats found dead near the wind farm.		

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 Facaeni Wind Farm – Phase I project will be periodically updated on the EDP Renewables website at the address:

http://www.edpr.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.

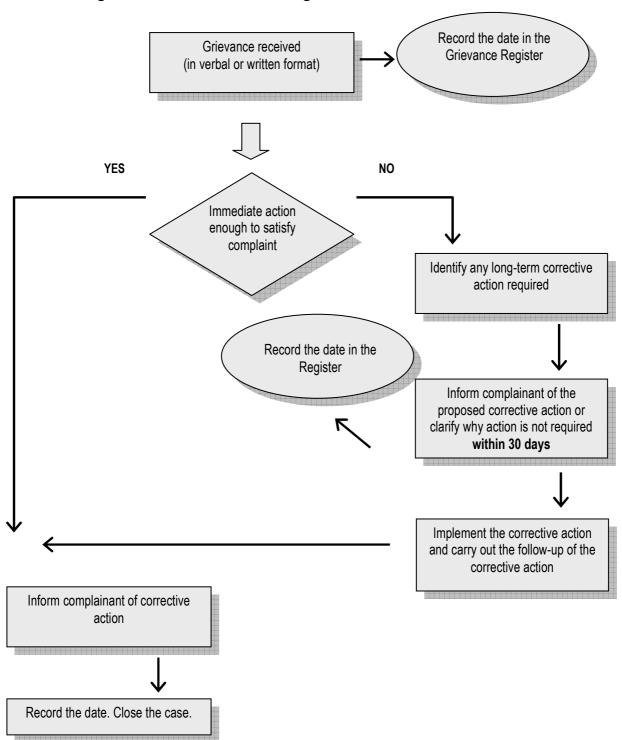


Figure 3: Flowchart for Processing Grievances

Full Nome	
Full Name	
Contact Information	By Post: Please provide mailing address:
Please mark how you wish to be	
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mail).	
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	By E-mail
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Preferred Language for communication	[Romanian]
	[English]
Description of Incident or Grieva	
Date of Incident/Grievance	One time incident/grievance (date) Happened more than once (how many times?) On-going (currently experiencing problem)
Date of Incident/Grievance	
Date of Incident/Grievance What would you like to see happ	Happened more than once (how many times?) On-going (currently experiencing problem)
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