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0 CHANGE CONTROL

Edition	Date	Description of the modification
00	23/11/2015	Initial Edition

1 OBJECTIVE AND SCOPE

This document defines the process followed by EDPR-PT to comply with measures and recommendations established in the frame work of the “National system of forest protection against fires” in Portugal.

This procedure defines processes and responsibilities to plan and execute the biomass fuel management operations, in the surroundings of equipment and buildings that are part of installation managed by EDPR in Portugal.

This procedure applies to all installations included in the scope of the EDPR Environmental Management System in Portugal.

2 REFERÊNCIAS

- NP EN ISO 14001:2004 standard
- Specifications and technical conditions – Biomass Fuel Management; October 2015 edition.
- Decreto -Lei n.º 124/2006, de 28 de Junho, republished with changes by the Decreto-Lei n.º 17/2009 de 14 de Janeiro

3 DEFINITIONS

- **National system of forest protection against fires** – System that was structured by the Decreto -Lei n.º 124/2006, de 28 de Junho, with changes introduced by the Decreto-Lei



n.º 17/2009 de 14 de Janeiro, whose main goal is to establish structural and operational measures and actions to prevent and protect the forests against fires.

- **Biomass fuel management** – The creation and keeping of the horizontal and vertical discontinuity of the biomass fuel in rural areas, by means of transformation or partial or total removal of biomass, namely using graze, cut or removal, employing most recommended technics with intensity and frequency adequate to satisfy the objectives of the sites.

4 ABBREVIATIONS

- **EDPR PT:** EDP Renewables – Business Unit (BU) Portugal.
- **EMS:** Environmental Management System
- **O&M-PT:** Operation & Maintenance department in the Portugal BU of EDPR
- **PP:** Development and Environment Department of the Portugal BU of EDPR
- **GA:** Asset Management in Portugal BU of EDPR
- **RP:** Windfarm Manager in the Portugal BU of EDPR
- **RR:** Regional Manager in the Portugal BU of EDPR
- **EE:** Contractor, or the company that executes the biomass fuel management works.
- **SNDFCI** National system of forest protection against fires

5 PROCEDURE

5.1 PLANNING

EDPR prepares each three years a biomass fuel management plan for all facilities operated by EDPR PT. In these plan must be considered the windfarms and the photovoltaic power plants in the scope of the EMS. Other facilities outside the scope of the EMS can be included.

The biomass fuel management plan should take into account the need to control the vegetation growth, in accordance with the SNDFCI criteria and eventual clarifications to its appliance, emitted by competent authorities or renewable energy sector associations.

The biomass fuel management should comprise the following areas and equipment:

- Circle with 53 meters centred in the axis of the wind turbine tower
- Substations, control buildings, switch stations, power stations - Strip with 50 meters around, starting on the exterior wall.
- Medium voltage power lines – strip matching the vertical projection of the exterior cables, added by an additional strip of 7 meters for each side; or simplifying 7,5 metres for each side of the axis of the power line.
- High and very high voltage power lines - strip matching the vertical projection of the exterior cables, added by an additional strip of 10 meters for each side; or simplifying 12,5 metres for each side of the axis of the power line.

Facilities and equipment, isolated or in sets, can be excluded of the planning for the following reasons:

- The facility is already covered by forest management protocol, negotiated between EDP RPT and a competent authority.
- The facility or equipment is located in agricultural land or urbanized land, without trees or shrub, therefore out of the scope of the SNDFCI.
- If there are already strips of protection, intrinsic to the project (photovoltaic power plant), with adequate dimensions and position to comply with criteria of the SNDFCI.
- For wind turbines, in case of the surrounding land is not under management of EDP RPT (out of contract agreements).

Yet, the final document (plan) must identify the facilities/equipment that were excluded with the corresponding reasons.

The plan should be prepared for a three year period, and must be completed until the month of September of the year before.

The plan should include the following information:

- List of all equipment/facilities that will be subject to biomass management in each year of the three year period
- Approximated area for each equipment/facility, where biomass will be managed.
- Estimated costs, grouped per year, and per region (according to regions defined by the O&M-PT)

- Existence of any geographical constrain, or date constrain.
- Reasons for partial or total exclusion of specific areas from the biomass fuel management.
- Land cover percentage estimates (trees or shrub), for each area; these values should be updated during implementation of the plan

Preparation of the plan should be carried out by PP, but it must be supported by GA and by O&M-PT. The final document should get the approval of those three areas. The estimated costs in the plan are used to prepare the O&M-PT annual budget.

At the same time, a set of plants will be prepared/updated, with geographical identification in an adequate scale of the areas where will be executed the biomass fuel management operations. There is also a technical specification to be delivered to the competitors, during the Request for Proposals to execute the biomass fuel management operations. The plants and the technical specification will be prepared by the PP, with the support of the GA and O&M-PT, and must be approved by these three areas.

The technical specification, together with the drawings, should present the following information:

- Identification and delimitation of intervention areas
- Identification of necessary previous works and documentation to be delivered by the contractor
- Description of activities to be carried out by the contractor
- Deadlines applicable to the contractor
- Environmental constraints and safety rules to be complied, with special attention to eventual works during the critical period of risk of fire, which should be avoided.
- List of all necessary documentation to be presents to EDPR
- Final documentation to be presented by the contractor to EDPR
- Record to be filled during execution of the works
- Graphic harmonization rules applied to drawings to be presented by the contractor.

The plan can be reviewed and should be updated during the three year period in which it applies, being the PP responsible for the reviews and updates that must be approved by the three areas (O&M-PT, PP and GA). The plan must be updated with conclusion dates, results of

contacts and agreements with landowners or competent authorities and important facts recorded during execution of the works.

5.2 HIRING

The three year plan, as well as the technical specification and plants, mentioned in the previous point, will serve as base documents to launch a Request For Proposal (RSP) to execute the biomass fuel management works.

Therefore, after request made by O&M-PT, the Purchasing Department will prepare and launch the RSP and will coordinate the negotiation process.

All the technical elements necessary will be provided by the PP. This same department will present also a list of companies operating in the market, that are qualified to this kind of work, in order to be considered in the RSP.

O&M-PT should request to the Purchasing Department to incorporate in the RSP, the following general conditions:

- Grants must be made per region
- The competitors should present unitary prices for two topologies of land cover (trees or shrub)
- Grants should include an agreement for unitary prices for the years.

During negotiation and grant process, PP will provide all the technical support to the Purchasing Department and O&M-PT should be informed of all the inputs provided.

5.3 EXECUTION AND SUPERVISION

Works will be executed by the companies selected through the project described in the previous point. After giving grant, all elements that compose the contracts will be sent to O&M-PT, so that they can follow the execution of the works.

Supervision will be realized by O&M-PT, through their windfarm managers that should follow the works in each site and equipment that they are in charge for. The works don't need to be

permanently followed, but at least two inspection visits must be made, one during execution and other in the end.

After conclusion of the works in each of the sites, the windfarm managers should inform the Regional Managers, with the following information: beginning date, conclusion date, confirmation of quantities reported by the contractor, detected failures in complying with the contract, namely in respect for safety and environmental rules.

The regional managers should, in their turn, forward this elements to the PP, one week after conclusion of the works.

The billing control will be executed by O&M-PT, through confirmation of quantities reported by the contractor and through contract management in SAP.

The PP will support O&M-PT with technical clarifications to eventual doubts in the contracts, legal requirements and internal applicable procedures, relating to environment.

The H&S department will support O&M-PT with technical clarifications to eventual doubts in the contracts, legal requirements and internal applicable procedures, relating to H&S.

6 RESPONSABILITIES

PHASE	PP	O&M-PT	GA	Purchasing	RP	RR	EE
PLANNING	Prepare three year plan for biomass fuel management	Support PP in preparing/reviewing the three year plan for biomass fuel management.	Support PP in preparing/reviewing the three year plan for biomass fuel management.				
	Approve three year plan for biomass fuel management	Approve three year plan for biomass fuel management	Approve three year plan for biomass fuel management				
	Prepare plants and technical specification	Support PP in preparing plants and technical specification	Support PP in preparing plants and technical specification				
	Update and review the three year plan						
HIRING	Technical support to Purchasing in the RSP process and negotiation,	Request to purchasing the launch of the RSP		Launch RSP and manage negotiation process, keeping			

	including list of qualified companies.			O&M-PT informed			
EXECUTION	Technical support to the RP and to O&M-PT	Execution supervision		Send all contract elements to O&M-PT	Follow execution works	Report work results to the PP	Execute works in accordance with the contract and technical specification
		Contract management.			Report work results to the RR		

7 FORMS

Not applicable