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**EXTENSION OF POTĘGOWO WINDFARM BY
WIELISZEWO AND BIĘCINO WINDFARMS
STAKEHOLDERS ENGAGEMENT PLAN**

EXTENSION OF POTĘGOWO WINDFARM BY WIELISZEWO AND BIĘCINO WINDFARMS STAKEHOLDERS ENGAGEMENT PLAN

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1. INTRODUCTION

Potęgowo Mashav Sp. z o.o. (further referred to as Mashav or the Company) is developing a large wind farm development – Potęgowo WF. The Potęgowo WF has been developed since 2007 by the company EWG Słupsk. This company and the Potęgowo WF were purchased by Potęgowo Winergy in 2014 (currently Potęgowo Mashav). Initially, the Project was developed as two projects, Potęgowo West (comprising of Przystawy, Bartolino and Sulechówko wind farm subprojects) and Potęgowo East (comprising of Karżcino, Wrzeście- Kępno, Bięcino and Głuszynko- Grapice wind farm subprojects). In 2018, upon decision taken by the Company, both Potęgowo West and Potęgowo East were considered a single project which constituted 81 fully permitted wind turbine generators (WTGs) of a total nominal capacity of 219.5 MW and auxiliary infrastructure. Such configuration was subject to ESDD conducted by REH and summarized in the ESDD report¹. Currently Potęgowo WF is at advanced stage of development – construction works at the subprojects were commenced in 2018.

In 2019 the Company decided to extend the Potęgowo WF (the Project) by construction of additional eight WTGs at the Bięcino WF and development of the another subproject – Wieliszewo WF.

The extension of the Bięcino WF assumes increase of the existing 5 wind turbine generators (WTGs) located near the Bięcino village, by the next, fully permitted 8 WTGs, with the following parameters: hub height 110 m, rotor diameter 120 m, nominal capacity 2.75 MW. The total installed capacity will be then 22 MW.

The Project consists also of an underground infrastructure of power transmission and control cables, access roads to individual WTGs and assembly and service yards, as well as dedicated main electrical substation (MES) additional to already built at Bięcino WF. The energy generated by the Bięcino WF, after transformation to high voltage (HV) in the Bięcino 2 MES, will be transferred further to MES Wierzbięcino (operated by Distribution Service Operator – PSE Operator S.A.).

The Wieliszewo WF assumes the construction of 17 wind turbine generators (WTGs) with the following parameters hub height 100 m, rotor diameter 90 m, nominal capacity 2.2 MW each. The total installed capacity will be then 37.4 MW.

The Project consists also of an underground infrastructure of power transmission and control cables, access roads to individual WTGs and assembly and service yards,. The energy generated by WTGs will be transferred via underground 11.4 km Power Transmission Line (PTL) to main electrical substation (MES Bięcino) and further vita the HV power transmission line to MES Wierzbięcino.

Both sites of the Project are used for agricultural purposes and are covered by the Local Zoning Plans Potęgowo and Damnica communes, which dedicate these areas for wind farm development.

- The local zoning plan for the Bięcino Project was established in 2010 (April 21, 2010)
- The local zoning plan for Wieliszewo Project was established in 2008 (February 29, 2008)

This stakeholder engagement plan aims at identification of the extended Project stakeholders at different stages of development and establishment of the rules for management of exchange of information between the company and the stakeholders.

¹ Environmental and Social Due Diligence. Potęgowo Wind Farm, Poland, June 2018.

2. REQUIREMENTS

According to the Polish legal framework, the disclosure of information and public consultation is a part of the investment process if the project can significantly influence the environment, as a part of the Environmental Impact Assessment (EIA) procedures, ruled by national implementation of the Directive No. 85/337/EEC (with further amendments) repealed in 2011 by the Directive No. 2011/92/EU of the European Parliament and the Council on the assessment of the effects of certain public and private projects on the environment. Public participation in the EIA process must be secured by the competent authorities by providing access to the project related documents, including EIA report to all interested stakeholders. The authorities are also obliged by law to make all resolutions and decisions taken within the procedure available for public review and manage comments and grievances submitted by the interested parties. The Polish legal framework does not provide for the investor's participation in the public consultation process as part of the EIA procedure, although disclosure of information and other forms of public consultations can be done by the investors voluntarily.

Public participation is also a part of administrative procedures related to establishment of local, regional and national spatial plans and programs. Such are worked out by the competent authorities (at local, regional and national level) in a transparent to public administrative procedures. In particular, crucial for communities growth local development masterplans and local zoning plans, are developed with full respect to the need of public participation and consultations. Such documents are subject to strategic impact assessments which are subject to additional public consultation process. The procedures are ruled by the national implementation of the EU Directive 2001/42/EC of The European Parliament and of the Council of June 27, 2001, on the assessment of the effects of certain plans and programs on the environment.

The Company, as a limited liability company is not obliged by the law to disclose any information on its environmental and social performance to the public. Certain informational obligations may result from the general environmental law and include reporting to the authorities on annual basis on environmental emissions, types and amounts of generated wastes or other obligations imposed by environmental authorities or environmental permits. Disclosure of such information has, however, no public character and occurs between the Company and the authorities.

Apart from the national requirements with respect to the consultation process, for projects to be financed by EBRD specific requirements apply as stipulated by the ESP (2014), in particular PR 10. The requirements are as following:

- Clients will engage stakeholders to provide up-date, current information to local, relevant communities and to other stakeholders in an appropriate, reliable and without manipulation way; - stakeholder engagement involves the action such as: stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders;
- Participation and commitment must be adequate to the scale of the project and its potential negative impact, the requirements related to national law (information, public consultation) as well as the regulations of the receiving country within the meaning of national law must be implemented;
- Clients have the duty of identifying the rights and obligations and appointing delegated staff who will be responsible for the implementation and monitoring of interest.

Requirements refer to:

- Engagement during the project preparation, which are defined as:
 - Stakeholder Identification- client identifies people directly or indirectly affected by the project or people who are interested in it, as well as the client identifies the size of the effects and the number of people on which the project may affect and whether they should be given the required assistance, Stakeholder Identification was done by the Company;
 - Stakeholder Engagement Plan- if there is a suspicion that the project may have an adverse impact on the environment or the community, it is the client's responsibility to develop and implement the Stakeholder Engagement Plan (SEP). Communication methods will be included as well as the grievance mechanism. SEP discusses in detail how public consultations are carried out, what measures have been taken, etc. The client cooperates with the relevant authority, in the situation of discrepancies between local requirements and these requirements, the client adheres to the highest standard of law and takes additional measures. It is the client's responsibility, to create the SEP which includes procedures and resources to ensure that adequate stakeholder engagement is conducted at the facility level, and that stakeholders proximal to its facilities receive information on the relevant facility's environmental and social performance. SEP was done by the Company.
 - Information Disclosure- access to project information is intended to help the stakeholders to understand the risks, impacts and opportunities of a project. It is the client's duty to provide the information to the communities, such as: purpose, nature, scale and duration of the project activities, risks to, and potential impacts on, stakeholders and proposed mitigation plans, time and place of consultation meetings, the grievances mechanism. Information are being posted at the contact points, in the native language etc.
 - Meaningful Consultation- the affected parties as well as stakeholders are involved in the consultation. It is very important that this process is bidirectional, to obtain the main objectives of consultations. The consultation must be free of external manipulation, interference, coercion, or intimidation. Each consultation is determined separately in accordance with stakeholder identification and depends on the project as well as the type of the project's potential adverse impacts on affected communities. Stakeholders will have the opportunity to respond to the project, risk, impacts, and mitigation measures. Documentation is prepared from the consultation process. Client will inform the participants of the final decision on the project.
 - Disclosure and consultation on Category A Projects- Category A projects could result in potentially significant adverse future environmental and/or social impacts which cannot readily be identified and will require the client to carry out a formalised, participatory ESIA process. The information and consultation process is present at every stage of the process. The client determines the scope of the key issues and identifies them. During it, stakeholders should have the chance to provide comments and recommendations on a draft SEP and other scoping documents. ESIA is being kept in the public domain during the life of the project. The client regularly reports this to their interested stakeholders on their website, as described in the SEP.
- Engagement during the project implementation and external reporting.
 - The client informs interested stakeholders about the current progress, environmental or social problems. It discloses additional information at key investment stages, such as specific problems that have been previously identified. If there are changes in the project with additional, negative consequences or problems for the community, the client must inform them how they will be resolved and the ESMP will be updated

according to SEP. In the case of significant changes and consequences, the client may make additional disclosure and consultation.

- Grievance Mechanism- The client must create and implement an effective complaints procedure in order to receive and solve problems easily from interested parties. The mechanism must be adapted to the size of the project. The mechanism must allow discreet and anonymous reporting of complaints and quick and effective resolution of the problem at every legal level. Those interested are kept informed about the progress of activities.

For description of consultations undertaken by the Company within the Project please refer to section **Error! Reference source not found.**).

3. SUMMARY OF PREVIOUS STAKEHOLDERS ENGAGEMENT ACTIVITIES

The stakeholder engagement activities conducted to date comprised:

- Communication with landowners at the sites, negotiations of land lease contracts and signing the contracts – first communication – mainly individual meetings - began in 2007.
- Formal contacts with the communes and environmental authorities within the local zoning plan establishments and EIA procedures – started in Q1 of 2007.
- Formal contacts with the Distribution System Operator while negotiating conditions of wind farm connection to the distribution networks and connection contracts – started in 2007
- Formal contacts with road, water management, aviation and other authorities and organizations while applying for acceptances or approvals necessary for wind farms and their infrastructure designing – started in 2007.

It should be mentioned, that the citizens of the involved communes and villages as well as other stakeholders had right to participate in the processes of establishing local zoning plans for all of the subprojects and that the public consultations were managed by the competent authorities as required by the spatial planning regulations. The local zoning plans were not questioned by any stakeholders and were not complained to the Voivodship authorities and become ultimately valid. As the spatial planning procedures are managed by the local authorities, the Company has not been directly involved in consultations but provide the authorities with information on desired location of the wind farms' infrastructure and technical parameters of the wind turbine generators.

The EIA procedures for each of the subprojects were conducted in line with the environmental law; in particular the EIA reports and other documents were available for review by interested stakeholders who had also a right to submit their concerns. Słupsk, Sławno, Potęgowo, Damnica and Malechowo Commune Offices disclosed information to the stakeholders by posting appropriate notifications on their websites (Biuletyn Informacji Publicznej in Polish) and information boards in the commune offices and involved villages. The stakeholders had 21 days, as required by law for submission of concerns, comments and grievances. During the EIA procedures, no applications and grievances from ecological organizations, local residents and other stakeholders were submitted to the authorities. Meetings with local citizens and other stakeholders were arranged by the Company in an individual manner.

Company maintain good relations with the stakeholders, as well as provide reliable source of information through multiple efforts:

- Regular quarterly meetings with commune (Wójtowie) and county representatives (Starosta/wicestarosta) in the area of the investment to keep good relationship and update on the status of the Project. During that meetings the Company was constantly assured about positive local attitude towards the investment and that they local authorities and residents expect the investment will be completed shortly.
- In summer 2016 Mashav representatives visited the commune council meeting (as the easement on commune plots was discussed) to discuss the investment in Damnica commune. Mashav representatives reportedly faced positive attitude.
- Since 2015 Company actively participated on annual harvest festival (dożynki) and other events in Malechowo commune as well in Potęgowo commune. Mashav representatives were invited for discussions with local stakeholders during that events. Information on Mashav and its investment plans was announced in front of local society and in local newspapers in

Malechowo. Results of those discussions suggest that all communes are waiting for the investment and local stakeholders are positive.

- During the period since the beginning of preparation of last report (2014) Mashav kept on developing the Project therefore there was a necessity to visit a variety of different inspectors in the authorities to receive consents/approvals. Reportedly, Mashav always was met with warm welcome and eagerness to help.
- Summer 2018, during disclosure of the first package for Potegowo West and Potegowo East, prior to construction works, Mashav organized meetings in all communes with local societies.

Up to date there were no protests form the stakeholders regarding the investment.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Stakeholders Identification

The following major stakeholders groups were identified:

Societies and individuals:

- Residents of Słupsk, Potęgowo, Damnica communes, especially residents of the following villages: , Potęgowo, , Redzikowo, Siemianice, Jezierzyce, Rogawica, Bięcino, Swochowo, , , Wieliszewo, Nowa Dąbrowa, Karżnica;
- Land owners of the investment sites;
- Residents of the villages along possible transportation roads, including: Siemianice, Rogawica, Jezierzyce, Nowa Dąbrowa, Wieliszewo etc.;
- Employees of the company and contractors of the civil works and future wind farms operation;

Commercial organizations:

Transmission System Operator.

Administrative stakeholders:

- Ministry of Development;
- Ministry of Climate and Environment;
- Voivodeship Office (*Urząd Wojewódzki*);
- Energy Regulatory Office (*Urząd Regulacji Energetyki*);
- Voivodship Monuments Conservator;
- RDOŚ - Regional Directorate of Environmental Protection (*Regionalna Dyrekcja Ochrony Środowiska*);
- State Labour Inspectorate (*Panstwowa Inspekcja Pracy*);
- Construction Inspectorate (*Inspektorat Nadzoru Budowlanego*);
- Voivodeship Marshalls (*Marszałek Województwa*);
- State Sanitary and Epidemiological Inspectorate (*Państwowy Inspektorat Santarno-Epidemiologiczny*);
- Local, self-governmental administration (i.e. Słupsk, Potęgowo, Damnica, Malechowo Commune Offices and commune villages offices);
- Road administration at communes, county, Voivodeship and national level;
- Police;
- Fire brigades;

Non-Governmental organizations:

- local, regional, national and worldwide avifauna protection organizations;
- local, regional, national and worldwide ecological organizations;

Organizational stakeholders:

- CERAC
- IIF
- GE
- Vestas
- Contractors and subcontractors executing the works of the investment plan;
- Equipment suppliers;

Lenders:

- International Finance Institutions which may consider financing the project.

4.2 Stakeholder Characteristics

Characteristic of the stakeholders is provided in the following table:

Table 1 Characteristics of the identified stakeholders

Societies and individuals			
Residents of places where investment works will be implemented	The project is being developed in Potęgowo (approx. num. of inhabitants 7031 approx. area 225 km ²), Damnica (approx. num. of inhabitants 6222 approx. area 170 km ²),;		
Land owners of investment sites	With all affected farmers appropriate contracts were signed for land lease or easement (approximately 100 agreements).		
Employees of the company and contractors of the civil works and wind farm operations.	The construction works and then operations of the wind farm will be outsourced to external contractors. Mashav Management Sp. z o.o. company will take management position		
Residents and institutions along transport routes during construction	The following villages have been identified as the most likely affected by the increased traffic during construction works: Potęgowo, Damnica, Dębiczka, Bięcino, Budy, Rogawica, Nowa Dąbrowa, Wieliszewo . No vulnerable institutions have been identified to be located in these villages by the transportation routes.		
Commercial organizations			
Transmission System Operator	Polskie Sieci Elektroenergetyczne Operator S.A. ul. Warszawska 165 05-520 Konstancin-Jeziorna Tel.: 022 242 26 00 Fax.: 022 242 22 33 www.pse-operator.pl		
Administrative Stakeholders			
Ministry of Development / Ministry of Climate and Environment	<table border="0"> <tr> <td>Ministerstwo Rozwoju 00-507 Warszawa, pl. Trzech Krzyży 3/5 Tel.: 22 693 50 00 kancelaria.mpit@mpit.gov.pl www.gov.pl/web/rozwoj/dane-kontaktowe</td> <td>Ministerstwo Klimatu i Środowiska 00-922 Warszawa, ul. Wawelska 52/54 Tel.: 22 579 29 00 Fax.: 22 579 22 24 info@mos.gov.pl www.mos.gov.pl</td> </tr> </table>	Ministerstwo Rozwoju 00-507 Warszawa, pl. Trzech Krzyży 3/5 Tel.: 22 693 50 00 kancelaria.mpit@mpit.gov.pl www.gov.pl/web/rozwoj/dane-kontaktowe	Ministerstwo Klimatu i Środowiska 00-922 Warszawa, ul. Wawelska 52/54 Tel.: 22 579 29 00 Fax.: 22 579 22 24 info@mos.gov.pl www.mos.gov.pl
Ministerstwo Rozwoju 00-507 Warszawa, pl. Trzech Krzyży 3/5 Tel.: 22 693 50 00 kancelaria.mpit@mpit.gov.pl www.gov.pl/web/rozwoj/dane-kontaktowe	Ministerstwo Klimatu i Środowiska 00-922 Warszawa, ul. Wawelska 52/54 Tel.: 22 579 29 00 Fax.: 22 579 22 24 info@mos.gov.pl www.mos.gov.pl		
Voivodeship Office	Pomorski Urząd Wojewódzki w Gdańsku Ul. Okopowa 21/27 Gdańsk 80-810 Gdańsk Tel.: 58 307 76 95 www.gdansk.uw.gov.pl		
Energy Regulatory Office /Urząd Regulacji Energetyki/	Grants concessions, approves of energy tariffs, counter works market monopoly. Urząd Regulacji Energetyki ul. Chłodna 64, 00-872 Warszawa Tel.: 22 661 61 07, 22 661 61 66, Fax.: 22 661 61 52		

	<p>e-mail: ure@ure.gov.pl www.ure.gov.pl</p>
<p>GDOŚ /General Directorate of Environmental Protection/ RDOŚ /Regional Directorate of Environmental Protection/</p>	<p>Generalna Dyrekcja Ochrony Środowiska w Warszawie ul. Wawelska 52/54, 00-922 Warszawa e-mail: kancelaria@gdos.gov.pl</p> <p>Regionalna Dyrekcja Ochrony Środowiska w Gdańsku ul. Chmielna 54/57, 80-748 Gdańsk Tel.: 58 683 68 00 Fax.: 58 683 68 03 e-mail: sekretariat@qda.rdos.gov.pl</p>
<p>State Labour Inspectorate</p>	<p>Państwowa Inspekcja Pracy / Główny Inspektorat Pracy ul. Barska 28/30 02-315 Warszawa Tel.: 22 391 82 15 Fax.: 22 391 82 14</p>
<p>Construction Inspectorate /Inspektorat Nadzoru Budowlanego/</p>	<p>Główny Urząd Nadzoru Budowlanego ul. Krucza 38/42 00-926 Warszawa Fax.: 22 661-81-42</p> <p>Powiatowy Inspektorat Nadzoru Budowlanego ul. Szarych Szeregów 14 76-200 Słupsk Tel. 59 841 85 49 Fax.: 58 841 85 49</p>
<p>State and Province Sanitary and Epidemiological Inspectorate</p>	<p>Wojewódzka Stacja Sanitarno-Epidemiologiczna w Gdańsku Dębinki 4, 80-211 Gdańsk Tel.: 58 344 73 00 Fax.: 58 520 32 53 poczta@wsse.qda.pl</p> <p>Powiatowa Stacja Sanitarno-Epidemiologiczna w Słupsku ul. Piotra Skargi 8, 76-200 Słupsk Tel.: 59 843 12 91 Fax.: 59 843 81 55 http://psseslupsk.pis.gov.pl/</p>
<p>Voivodeship Monuments Conservator</p>	<p>Pomorski Wojewódzki Urząd Ochrony Zabytków Delegatura w Słupsku ul. Jaracza 6, 76-200 Słupsk Tel/fax: 59 842 64 34 extension 31 Email: slupsk@zabytki.mail.pl</p>

	<p>https://wuoz_gd.bip.gov.pl/delegatura-w-slupsku/delegatura-wuoz-w-slupsku.html</p>
Voivodeship Marshall	<p>Urząd Marszałkowski Województwa Pomorskiego w Gdańsku Ul. Okopowa 21/27 Gdańsk 80-810 Gdańsk Tel.: 58 326 85 55 Fax.: 58 326 85 56 e-mail: zarzad@pomorskie.eu</p>
Local, self-governmental administration	<p>Urząd Gminy Słupsk ul. Sportowa 34 76-200 Słupsk Tel.: 59 842 84 60, Fax.: 23 842 92 54 e-mail: info@gminaslupsk.pl</p> <p>Urząd Gminy Potęgowo ul. Kościuszki 5, 76-230 Potęgowo Tel: 59 8115072, 59 8115119 Fax: 59 8115309, 59 8115072 e-mail: sekretariat@potegowo.pl www.potegowo.pl</p> <p>Urząd Gminy Damnica ul. Górna 1, 76-231 Damnica tel. +48 59 848 44 31 ug@damnica.pl www.damnica.pl/</p> <p>Starostwo Powiatowe w Słupsku ul. Szarych Szeregów 14 76-200 Słupsk Tel. 59 841 85 00 Fax.: 58 842 71 11 e-mail: starostwo@powiat.slupsk.pl</p>
Road Administration	<p>Generalna Dyrekcja Dróg Krajowych i Autostrad ul. Żelazna 59 00 - 848 Warszawa tel. (+48 22) 375 88 88 email: kancelaria@gddkia.gov.pl</p>

	<p>Pomorski Zarząd Dróg Wojewódzkich w Gdańsku ul. Mostowa 11A, 80-778 Gdańsk Tel.: 58 320 20 25 Fax: 58 320 20 25 e-mail: sekretariat@zdw-gdansk.pl</p> <p>Zarząd Dróg Powiatowych w Słupsku ul. Słoneczna 16e 76-200 Słupsk Tel.: 59 842 07 30 Fax.: 59 842 02 84 e-mail: zdp@zdp.slupsk.pl</p>		
Police	Police stations at Voivodeship, county and commune level.		
Fire brigades	Fire brigades stations at Voivodeship, county and commune level.		
Non-Governmental Organizations			
NGOs – birdlife associations local and international	<table border="0"> <tr> <td>OTOP - Ogólnopolskie Towarzystwo Ochrony Ptaków BirdLife International OTOP ul. Odrowąża 24 05-270 Marki k. Warszawy tel:0-22 761 82 05 faks: 0-22 761 90 51 biuro@otop.org.pl</td> <td>World Wildlife Fund, WWF Polska ul. Wiśniowa 38 02-520 Warszawa tel. (22) 849 84 69 / 848 73 64 tel. (22) 848 75 92 / 848 75 93 fax (22) 646 36 72</td> </tr> </table>	OTOP - Ogólnopolskie Towarzystwo Ochrony Ptaków BirdLife International OTOP ul. Odrowąża 24 05-270 Marki k. Warszawy tel:0-22 761 82 05 faks: 0-22 761 90 51 biuro@otop.org.pl	World Wildlife Fund, WWF Polska ul. Wiśniowa 38 02-520 Warszawa tel. (22) 849 84 69 / 848 73 64 tel. (22) 848 75 92 / 848 75 93 fax (22) 646 36 72
OTOP - Ogólnopolskie Towarzystwo Ochrony Ptaków BirdLife International OTOP ul. Odrowąża 24 05-270 Marki k. Warszawy tel:0-22 761 82 05 faks: 0-22 761 90 51 biuro@otop.org.pl	World Wildlife Fund, WWF Polska ul. Wiśniowa 38 02-520 Warszawa tel. (22) 849 84 69 / 848 73 64 tel. (22) 848 75 92 / 848 75 93 fax (22) 646 36 72		
Local ecological NGOs	None has been identified.		
Organizational stakeholders			
CERAC GE Iif	These companies have provided the funds that were needed to acquire the Project, finalize the development and source the wind turbines, the civil and the electrical balance of plan through a dedicated management company Mashav Management .		
Construction companies Equipment suppliers Transport companies	<p>Construction works, equipment supply and transport services will be conducted by reputable companies, experienced in this kind of assignments selected on the basis of tender procurements.</p> <p>The construction works will be conducted by a top tier reputable construction companies, experienced in this kind of assignments, selected on the basis of tender procurements.</p> <p>WTGs will be supplied by GE and Vestas. Other equipment by reputable manufacturers.</p> <p>Delivery of equipment will be arranged by reputable transport companies.</p>		
Lenders			
International Finance Institutions	<p>EBRD European Bank for Reconstruction and Development (EBRD) www.ebrd.com</p> <p>EBRD (Polish branch) Europejski Bank Odbudowy i Rozwoju Office in Warsaw</p>		

	Emilii Plater 53, 00-113 Warszawa Tel. 22 520 57 00
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5. DISCLOSURE OF INFORMATION

Disclosure of information and further proper communication with the stakeholders is an important measure to identify issues that could affect project development or environmental or social issues that should be taken into account to meet the good management practice rules.

Disclosure of project related information will be arranged following the legal requirements as well as the international standards of project development and internal Mashav standards, also including Access to the Information and Stakeholder Involvement procedure.

Taking into account current status of Project development, the disclosure of project related information is required by law only in reaction to requests of the environmental control authorities if significant breaches of the environmental law or permit conditions are indicated by such authorities. The Company will strictly follow legal requirements for disclosure of information.

In order to meet the highest international standards and following the good management practice as well as in order to meet specific requirements of the lenders, the Company will also implement the additional transparency procedures of information disclosure. These will comprise:

- Presentation of the project on the company web site (<http://mashavenergia.com/projekt-potegowo/>) , which will include Project Disclosure Package that contains: Supplementary Report; National EIA reports prepared for the subprojects, based on which the environmental decisions were granted for all of the subprojects;; ESAP; SEP; Cumulative Assessment Report; Non-technical Summary (NTS); short description of the Project status, grievance form with short description of the grievance mechanism and, at later stages of the Project development also annual reports of the company environmental, social, and health and safety practices and performance. The web site will be regularly updated.
- Arrangement of a contact points in the Commune Offices, where the Project Disclosure Package will be available. Information about the contact points will be distributed among the societies via information of the Commune Offices websites and notice boards in the villages.
- At the discretion of the company, PR actions in local newspapers (e.g. in "Nasza gmina nasze życie", "Obserwator lokalny", "Gazeta Kaszubska", "Głos Pomorza", "Dziennik Bałtycki" and "Gazeta Pomorska") and nationwide, radio (e.g. Polish Radio programs 1 and 3) and TV (e.g. TVP1, TVP2, TVP3, Polsat, TVN);
- Active participation in public consultation process arranged and managed by the administrative stakeholders. Active participation is understood as informing in advance about the consultation meetings at the contact points, periodic presentation of the Project, answering questions, placing information not only on the Company's website, but also in local media, conducting satisfaction surveys, conducting a citizens' workshops etc.;
- The company will communicate directly with interested stakeholders, as appropriate,
- Distribution of the project related information among the own employees and employees of the daughter companies through internal mechanisms.

6. STAKEHOLDER ENGAGEMENT PROGRAM

The consultation with the stakeholders will be maintained by Mr. Grzegorz Borowiecki. For contact details please refer to section 7.

Stakeholders engagement measures will depend on the stage of development of the Project.

During the 60 days period of the Project extension disclosure and consultations as required by ESP (2014) for category A projects, the Company will arrange in cooperation with the local authorities the public meetings in the affected communes, to provide the local residents and NGOs with requested information and clarify all potential concerns. During the meetings the Company representatives will provide general information on the Project and environmental and social impacts, assumed Project milestones and will answer all questions the participants may have. An issue of increased road risk due to delivery of construction materials and oversized cargo will also be highlighted. Further, contact points will be arranged at the communes' sites.

At the construction stage, communication with residents will be primarily focused at collection and examination of grievances which may be submitted due to nuisance of construction works or increased traffic. The grievance form and short description of the grievance mechanism will be available in the contact points of the communes and at each of the construction sites.

During construction and then operation of the wind farms communication with administrative stakeholders will be focused on provision of reports required by law (annual waste generation report, reports on use of the environment) and submission of clarifications to queries and participation in formal meetings. The relevant authorities will be invited (as appropriate) for site visits and on-site clarification of the Project or operations status. In particular, the relevant authorities (communes and RDOS) will be submitted with monitoring reports in line with the binding obligations stipulated by the environmental decisions. On annual basis the Company will prepare news for the local newspapers and place information at the contact points for local society about the Project progress and environmental and social performance.

During operation of the wind farms the Company will monitor impact on local residents who may potentially be affected by the shadow flicker effect by collecting and analyzing submitted grievances and meeting such residents at least one per year. Also the cases of ice throw affecting the local roads will be recorded and monitored.

The Company, at all stages of the wind farm development, will keep the local society and other stakeholders informed about the Project (see section **Error! Reference source not found.**), primarily by hosting information on the Company web site (<http://mashavenergia.com/projekt-potegowo/>) but occasionally, also articles or inserts to local internet and printed newspapers, radio and TV.

Should any issues be raised by the stakeholders, the company management will react accordingly in the shortest possible time.

Below there is a summary of consultation activities that the company will undertake as part of the Engagement Plan:

Table 2 Consultation activities that the Company will undertake as part of the Engagement Plan

Stakeholders:	Consultation, communication method and objective	Proposed milestones	Responsibility
<i>Directly or indirectly influenced by the Program</i>			
Residents of places where investment works will be implemented	Company and local administration websites. Information boards at the commune offices. Local press Direct contacts initiated by residents	Commencement and completion of the construction works and in reaction to submitted grievances during and after the investment process (see Section 5 and the text above).	The Company The Company Commune administration
Land owners of investment sites	Company website. Information boards at the commune offices and local administration websites. Direct contacts with residents and landlords.	Commencement and completion of the construction works and in reaction to submitted grievances during and after the investment process.	The Company Project Manager Commune administration
Company employees	E-mail Information boards Meetings	Continuously, during the Project lifetime	The Company Project Manager
Residents and institutions along transport routes during construction	Company and local administration websites. Communal information boards at affected villages of: Damnica, , Bięcino, Nowa Dąbrowa, Wieliszewo, . Local press	Prior commencement and during construction works.	The Company Project Manager Commune administration
Commercial organizations			
Transmission System Operator	E-mail and regular mails Meetings	On as needed basis during the whole Project lifetime	Company Management, Project Manager
Administrative Stakeholders			
Ministry of Development Ministry of Environment	Formal letters, notifications, meetings on as needed basis.	In accordance with the requirements of administrative procedures	Company and project management
Energy Regulatory Office /Urząd Regulacji Energetyki/	Exchange of documentation and correspondence regarding the Project.	During the Project lifetime, on as needed basis, following legal requirements	Company Management

Pomorski and Zachodniopomorski Voivodship Monuments Conservator	Formal letters, notifications, consultation meetings –exchange of information, documentation and correspondence regarding the project.	During construction phase of the Project.	Project Manager
RDOS /Regional Directorate of Environmental Protection/	Submission of environmental monitoring reports. Mail exchange and meetings.	After completion of the construction works, during exploitation of the wind farm.	Company Management Environmental Specialist
State Labour Inspectorate /Państwowa Inspekcja Pracy/	Consultation meetings – exchange of information, documentation and correspondence regarding the project.	During the project lifetime, following legal requirements, on as needed basis	Company Management
Construction Inspectorate /Inspektorat Nadzoru Budowlanego/	Consultation meetings – exchange of information, documentation and correspondence regarding the project.	Continuous process during construction works and commissioning, on as needed basis	Project Manager
Sanitary Inspectorate	Exchange of documentation and correspondence regarding the project.	During the Project lifetime, following legal requirements	Project Manager
Voivodship Marshals	Notifications, formal letters, submission of information on use of the environment.	During the Project lifetime, following legal requirements	Project Manager Environmental Specialist
Local selfgovernment administration	Consultation meetings – exchange of information, documentation and correspondence regarding the project.	Continuous process - in accordance with the requirements of administrative procedures	Project Manager
Road Administration	Consultation meetings – exchange of information, documentation and correspondence regarding the project.	During the construction works – delivery of the wind farm elements	Project Manager
Police	Consultation meetings – exchange of information, documentation and correspondence regarding the project.	Continuous process - in accordance with the requirements of administrative procedures	Project Manager
Fire Brigade	Consultation meetings – exchange of information, documentation and correspondence regarding the project.	Continuous process - in accordance with the requirements of administrative procedures	Project Manager

Non-Governmental Organizations			
NGOs – birdlife associations local and international, local ecological NGOs	Company website, information meetings, and answers to direct questions or complaints.	During the whole Project lifetime	Project Manager Environmental Specialist
Organizational Stakeholders			
Construction companies Equipment suppliers Security companies	In accordance with agreements between the company and construction companies, equipment suppliers and security companies.	Before the commencement of works regarding the investment and then during construction and operation of the wind farm.	Project Manager
Lenders			
International Finance Institutions	Consultation meetings on as needed basis. Exchange of information, documentation and correspondence regarding the project.	Continuous process - in accordance with the loan contract.	Company Management

7. GRIEVANCE MECHANISM

The Company has implemented a routine to manage the grievances submitted by the Project internal (workers) and external stakeholders.

The Company developed a general rule concerning the time of response to any grievance and informing about of time of expected response in case of complex grievance. All of the grievances together with information on a measure applied to address them are reported to the Company headquarters.

The company will inform the local authorities in the communes about the grievance mechanism and provide them with contact details on which grievances can be submitted. All grievances should be addressed to:

Project Manager:
Grzegorz Borowiecki
Tel: +48 695 666 516
Email: grzegorz.borowiecki@mshavenergia.com

The Public Grievance form is presented below. The form (both in English and Polish) is posted on the company website, together with the description of the grievance response mechanism. The grievance form and description of the grievance mechanism will be also available in the office of local authorities and after completion of the construction works also at the sites.

Table 3 Proposed 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"/> Polish <input type="checkbox"/> 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	
<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?	

8. MONITORING

The SEP is monitored by the Company, and by the Project Manager.

Monitoring of the stakeholders' engagement includes among others:

- recording the number of grievances received, their nature and response time as well as submission channel (Mashav office, administration, etc.);
- maintaining meeting records, including number of attendees and issues discussed;
- maintaining records of communications with administrative stakeholders;
- maintaining records of queries from NGOs and academic institutions, and
- other as relevant.

9. RESOURCES AND RESPONSIBILITIES

This SEP will be implemented by the employees of the Company and will be supported by all of the Company's resources. Responsibility for the effective SEP implementation will bear Mr. Grzegorz Borowiecki, Project Manager.

10. TIMETABLE

This SEP will be implemented in line with the major milestones as presented in the table below.

Table 4 Major milestones of SEP implementation

Task	Due date
Establishment of the additional information point at the Potęgowo commune site	End of June, 2021
Submission of the monitoring reports to the authorities	In line with provisions of the respective environmental decisions
Submission of the annual reports on use of the environment to the relevant authorities	On annual basis, by the end of January for the previous year
Submission of the EHS reports to Lenders	On half-year basis during construction and on annual basis afterwards.

11. TIMETABLE

The following milestones of the SEP implementation and Project development are expected:

- Project Disclosure Package posting on the Company website – mid-Feb 2021
- Maintaining communication with administrative stakeholders already initiated by the Company prior to construction works as Company is in last mile development of the Project.

Presentation of EH&S reports on the facilities performance – on annual basis, starting a year following commissioning of the wind farm.