

TABLE 1: ENVIRONMENTAL AND SOCIAL ACTION PLAN TEMPLATE POTEGOWO WIND FARM: POLAND

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
0	General Corporate and Project management						
0.1	Appoints an EHS manager for the Project and maintain an EHS management system during construction and operation of the wind farm. This includes internal audits of contractors. Develop Project specific Key performance Indicators (KPIs) as part of EHS management system	Ensure compliance and implementation of Corporate polices and Lender requirements.	Best practice Lender requirements	Own	Ongoing	EHS manager EHS management systems in place KPIs developed by time of commissioning	
0.2	Ensure fully compliance of the Project with Polish legislation, with Lender requirements and best practices Ensure that the Project meets the requirements of the Local development plans and appropriate consultation and communications done as part of development	Compliance Need to ensure public relations are maintained	National legislation Lender requirements	Own	ongoing	Compliance Summary of status in Annual report to Lenders	
0.3	Within 3 years of operations undertake an independent ESH&S audit of the Project to assess compliance and implementation of best practices. This will include operations issues as well as biodiversity issues. Based on this review EHS management plans and Wind Farm management	Review post construction operations and ensure design criteria met and assess Key Performance Indicator (KPIs). Based on the audit amend the ESAP and EHS management plan accordingly to mitigate risks and ensure ongoing	Lender requirement	External	Within 3 years of commissioning plant	Report to Lenders as part of annual report	

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	Undertake an similar audit after 10 years of operations	compliance with National legislation as well as Lender requirements.					
0.4	Submit regular reports to the Lenders on: <ul style="list-style-type: none"> • Environmental, social, occupational health and safety performance • KPIs • Status of ESMP implementation • status of each ESAP action 	To ensure measures within the ESIA/ESMP and permit conditions are being implemented appropriately.	Lenders Requirements	Own	Reports to be submitted on a 6 monthly basis during construction, and annually after.	Reports submitted on time, with no objection from lenders	
0.5	Company to develop a corporate EHS management plans and CSR plan in line with best practice and disclose non-financial information to the public at the corporate level	CSR to include information on the Company and Key performance Indicators (KPIs). As part of the CSR and SEP develop any community support programs	Best practice	Internal and External	Within 3 years of commissioning or sooner	Link to CSR report in annual report	
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Implement the requirements of the ESIA including the ESSMP and permit conditions for the various components of the Project Ensure requirement are included in any contractor tenders, and ensure contractors need to adhere to National and Lender requirements.	Compliance	National legislation Lender requirement	Own/External	ongoing	Report in annual report on compliance	
1.2	As part of the EHS management system, develop and implement a	Ensure that the contractor is contractually bound to	Lenders Requirements	Internal and	Prior to executing	Plan developed and relevant requirements	

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	contractor/sub-contractor management plan to manage ESHS performance of construction and other contractors including as a minimum: <ul style="list-style-type: none"> • Inclusion of relevant ESAP and ESMP requirements in contracts/sub-contracts • Definition of roles and responsibilities between Winery and contractors • Requirements for construction contractors to develop topic-specific ESHS management plans including HSS; Labour; Traffic & Transport etc • Client monitoring and auditing • Definition of ESHS contractor performance reports to allow Winery to report to Lenders • Verification of competence and/or training of ESHS responsible staff 	deliver all ESIA and ESMP requirements	Good Practice	advisors	contracts	included in contracts	
1.3	Operational ESMP to include a disturbance management plan to address potential noise and shadow flicker monitoring and mitigation, including the requirements as noted in PR4 and bird and bat monitoring as defined under PR 6	Need for compliance	Lenders Requirements Good Practice	Internal and advisors	Prior to construction and ongoing	Overall compliance	
PR2	Labour and Working Conditions						
2.1	Prepare, implement and communicate to the workforce an HR policy and	Improved human resources practices and compliance	Lender requirements	Internal/	Prior to main construction	Report compliance Contractor policies &	

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	procedures to meet Lenders and national legislation requirements (contractors to have equivalent policies in place). Ensure both the Client and contractors retain appropriate responsible persons for PR2 implementation	with National legislations and PR2 requirements	(EU/ILO standards) National legislations	Contractors	phase	procedures approved by Client or independent professional	
2.2	Establish a formal employee grievance mechanism for all direct and contracted employees and communicate it to the workforce.	Improved employee/contractor relationship and management	Lender requirements	Internal/ Contractors	Prior to main construction phase	Employee Complaints Procedure Complaint tracker Progress update on resolution of employee complaints included in lenders reports	
2.3	Conduct risk assessment of core supply chain regarding working conditions and child and enforced labour in accordance with PR2	Labour unrest, company reputational damage	Lender requirements (EU/ILO standards) National legislations	Internal (oversee compliance)/ Contractors (develop and implement supply chain auditing and monitoring procedure)	Prior to construction Prior to operations	Supply chain risk assessment report	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Within one year of commissioning, undertake post construction noise assessment to assess actual noise level at all residential areas within 1 km of wind turbines.	Need to ensure noise and vibration within acceptable limits.	National legislation Best practice	External	Post construction	Report to Lender with recommendations	

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	Based on the results of the above assessment and consultation with residents develop additional mitigation plans to ensure compliance.						
3.2	Implement all monitoring requirements for visual, noise and dust impacts management This is to be implemented during construction as well as operation	Compliance with International Best Practice and National Standards Ensure that nuisance claims are limited during construction phase	EBRD PR3 Polish Standards World Bank Group: Environmental Health and Safety Guidelines Wind Energy	Project EHS Lead Contractors	During construction and operation	Reporting against monitoring requirements as specified in the ESMMP, plus ongoing feedback.	
PR4	Health and Safety						
4.1	Implement health and Safety standards and ensure staff and contractors in compliance with National standards	Ensure compliance	National legislation Lender requirements	Internal	ongoing	Report any non-compliance incidents in annual report.	
4.2	Develop and implement traffic and transport management plan(s) to cover turbine and materials delivery and include access, routing, diversions, exceptional loads, driver training and consultation with local authorities	Ensure compliance	National legislation Lender requirements	Contractors	Prior to delivery of equipment and materials and implemented throughout construction	Plan(s) developed Reports on compliance with plan and traffic incidents	
4.3	Regular meetings to be held with households potentially affected by shadow flicker (see ESIA), investigate reports/complaints of shadow flicker.	Proactively manage stakeholder relations Reduce potential for disturbance and community	Lender requirements Good practice	Internal	Quarterly meetings during first year of operation	Evidence of meetings Complaints register	

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	If needed, implement mitigations to reduce disturbance	complaints			reducing to annual thereafter Complaints investigated upon receipt	Mitigations implemented if required and agreed with affected people	
PR6	Biodiversity and Living Natural Resources						
6.1	Undertake bird and bat monitoring of the Project during construction as well as operational phases.	Review actual impacts based on data review	National Law Best practice, OTOP and Polish Wind Association Guidance	External	Ongoing	Monitoring during construction and post construction	
6.2	Appoint an independent qualified Ornithological expert (IEO) to undertake the monitoring reviews Review need for continued monitoring after 3 years of operations based on final recommendations of IOE in year 3. Publish summary of the report on intranet and make available as part of SEP. Share results also with regulators	Independent monitoring		External	Construction and Operation	Independent report provided each year. Summary provided to Lenders part of annual report	
6.3	Update ornithological collision risk model with monitoring from first three years of operation and develop adequate future monitoring and mitigation measures. Based on this develop a long term	Impacts on biodiversity receptors. Informing adaptive management of biodiversity risks.	EBRD PR6 Best Practice	Project Company EHS Management Time Biodiversity Specialists	Prior to Project Mobilisation	Revised collision risk model undertaken and findings fed into the BAP. Audit of findings by suitably qualified	

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	Biodiversity Action Plan (BAP) and active turbine management plan to address monitoring and turbine management – including speed of turbines, shut down as needed aimed at mitigating risks					specialist (Lender’s E&S Advisor)	
6.4	Support and part take in any cumulative assessments of wind farms in the area.	Ensure cumulative issues are addressed. Share bird and bat data with regulators and other developers as appropriate to facilitate any additional future cumulative impacts	Best practice	As needed	As needed		
PR8	Cultural Heritage						
8.1	Prepare and implement a Chance Finds Procedure and train personnel on its application	Minimise risk of impacts on cultural heritage	Lenders requirements	Internal/Contractor	Prior to construction	Plan prepared and submitted to Lenders for review	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	Stakeholder Engagement Plan (SEP) to be implemented through construction and operation period Ensure regular consultation on project details with local communities and provision of summary reports on operations as required in line with	Ensure effective stakeholder engagement and maintain good community relations	Lenders requirements	Internal	Prior to operation	Plan prepared and submitted to Lenders for review and non-objection received prior to implementation Meeting minutes and billboard notifications available for Lender review as part of annual	

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	best practice and CSR requirements.					reports	
10.2	<p>Update the SEP to define operational phase engagement and reporting with local stakeholders including adjacent communities and implement</p> <p>This should include specific engagement required related to disturbance impacts as noted under PR3 & 4</p>	Ensure effective stakeholder engagement and maintain good community relations	Lenders requirements	Internal	Prior to operation	<p>Plan prepared and submitted to Lenders for review and non-objection received prior to implementation</p> <p>Meeting minutes and billboard notifications available for Lender review as part of annual reports</p>	
10.3	Develop and implement an effective community grievance mechanism (NB this is separate to the grievance mechanism described under PR2)	Ensure effective stakeholder engagement and maintain good community relations	Lenders requirements	Internal	Prior to construction and throughout construction and operation	Procedure developed and evidence of awareness raising of local communities on how to access the mechanism	