

**Final Draft Environmental and Social Action Plan (ESAP)
Phase II Banie Wind Farm Project
Poland**

No	Action	Description	Justification	Implementation plan	Resources	Monitoring indicators	Comment
<i>1. Environmental Health and Safety (EHS) Management</i>							
1.1	Develop and implement environmental, health and safety and social (EHSS) policies and procedures into a comprehensive management system.	Develop EHSMS which will address the company's will to operate in line with national and international standards and good practice with respect to manage the business in sustainable way, taking into account environmental, health and safety and social context of the company operations.	Best Practice PR1 IFC PS1	Prior commencement of the wind farms operations.	Own resources/ external consultants	Written policies and procedures.	The system may base or be similar to these by ISO 14001 and OHSAS 18001. Consider certification of the system within a 3 years horizon. Report to Lenders.
1.2	Within the current company's management develop and maintain a structure to manage EHSS matters during construction and then operation of the wind farm. Assign appropriate resources, responsibilities and budget.	Develop organizational structure for management and monitoring of EHSS issues.	Best practice, PR 1 IFC PS1	By commencement of construction works at the wind farm.	Own resources	Organizational chart of the company.	Report to lenders
1.3	Develop EHSS requirements to be followed by the contractors and subcontractors of the construction works and then operator of the wind farm.	Develop clauses to be included into the contracts for construction works and further for the wind farm operational management that will secure all applicable EHSS national and EU law and good management standards to be followed. The clauses should clearly define contractors' duties and responsibilities. The contracts should secure that similar rules will apply to subcontractors.	Best practice PR 1 IFC PS1	Before first contract for construction works is signed.	Own resources.	Written set of requirements.	Report to Lenders in the first summary report.

1.4	Develop and maintain a program for monitoring of the construction works and then operation of the wind farm.	<p>Develop a set of Key Performance Indicators (KPI) to monitor environmental, H&S and social matters during construction works and then operation of the wind farm. The KPIs should include but not be limited to:</p> <ul style="list-style-type: none"> • number and type of events that could affect environment during construction works; • number and type of H&S accidents during construction works; • number and type of events that could affect societies within the influence area of undertaken construction works and cargo deliveries; • environmental emissions (including types and amounts of generated wastes) of the wind farm during its exploitation; • number and type of H&S accidents affecting employees of the wind farm operator; • number and type of accidents affecting external individuals and causing damages; • number of third party grievances due to shadow flicker effect, electromagnetic impacts, noise and other impacts generated by operating wind farm. <p>Work out rules for KPIs monitoring and reporting on regular basis.</p>	Best practice. PR 1, PR2 IFC PS1, PS2	Before commencement of the construction works.	Own resources/ external consultant.	Written monitoring program.	Report to lenders. In 2016 provide KPI's to lenders.
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1.5	Implement an environmental supervision of the construction works.	Construction of the WTGs approximately 500 m distant from the nearest 2000 area conduct under supervision of a life scientist.	Best practice. Lenders' requirement.	Construction works/construction phase of the Project.	Own resources/ external consultant	Written reports/records from the supervision.	Present reports to the Lenders.
1.6	Provide proper EHSS training to own employees and ensure such training is provided to contractors and subcontractors.	Follow requirements of national law, EU standards and good management practice with respect to provision of appropriate training to the workers. Conduct periodical audits of contractors' compliance with training requirements.	Best practice PR 2 IFC PS 1, 2	From the selection of the construction works contractors onwards.	Own resources/ external consultant	Records of employees training and contractors' audits.	
1.7	Develop rules for internal reporting. Maintain during construction and operation of the wind farm.	As part of SEP develop procedures for the contractors to report EHSS status of the project and for internal reporting within the organizational structure of the company.	Best practice. PR 1, PR 2 IFC PS1, PS2	As soon as possible, before commencement of the construction works. Continue during the project lifetime.	Own resources.	Written internal reporting rules of SEP	
1.8	Develop rules for external reporting. Maintain during construction and operation of the wind farm. Undertake once a year a public meeting with local stakeholders to present results project development and monitoring results.	As part of SEP develop procedures for reporting of project status to Lenders and disclosure of information to external stakeholders.	Best practice, PR 1 IFC PS 1	As soon as possible, before commencement of the construction works. Continue during the project lifetime.	Own resources	Written external reporting rules of SEP	
2. Operational							
2.1	Assess types and amounts of wastes which will be generated at the wind farms.	The types and amounts of wastes which will be generated at the wind farms should be estimated and proper waste management plan should be developed.	Best practice	Before commencement of the construction works	Own resources/ external consultants/ external contractors.	Internal note.	Report to Lenders.

2.2	Develop transportation plan for the construction phase of the Project. Inform local societies about increased risk of traffic accidents.	The truck routes should be planned in such a way to avoid as far as possible concentration of drives across the nearby villages. Adopt newly developed internal roads if possible. Inform local societies about the increased traffic and related accident risk as well as about the implemented grievance mechanism.	Best practice PR 4	Before commencement of the construction works	Own resources/ external consultants/ external contractors.	Internal note.	Report to Lenders.
2.3	Ensure appropriate protection measures for cultural heritage while construction works.	Ensure that the ground works are immediately stopped if any artefacts are encountered. Inform appropriate Cultural Heritage Protection Authorities and make the site available for archaeological research.	Best practice. PR 8 IFC PSS	During construction works of the wind farm.	Own resources. Cultural Heritage Protection Authorities.	Record of ground works stops due to presence of artefacts. Archaeological research reports. Written communication with the Cultural Heritage Protection Authorities.	Report to lenders.
2.4	Place warning signs at access roads to the WTGs. Place information boards at the public roads in risk of ice/blade throw.	As a precaution measure keep the society informed about the risks related to potential of ice or blade throw.	Best practice PR 4	Prior the wind farms are operational.	Own resources/ external contractors.	Internal note.	Report to lenders.

2.5	Undertake post-construction monitoring for 5 years in line with Polish and EU Guidelines. Develop mitigation measures as appropriate.	<p>After completion of the construction works undertake at all sites environmental monitoring in line with requirements of environmental decision and good practice, inclusive of:</p> <ul style="list-style-type: none"> • noise impact; • impact on birds and at the Kozielice subproject also presence of white-tailed eagle in the nest • impact on bats. <p>Also monitor shadow flicker effect and electromagnetic impact of the wind farm, by recording related grievances. Should monitoring results indicate excessive impact of the wind farm develop and implement appropriate mitigation plan.</p>	Best practice. Environmental Decisions IFC PS1	Starting from the wind farm operational start-up onwards.	External consultants.	Monitoring reports.	Report the monitoring results and if appropriate mitigation plan in the annual reports to lenders. Annual report to include summary of birds and bats monitoring.
2.6	Develop an active turbine management plan.	Based on the monitoring results develop and implement an active turbine management plan to reduce the impact, if occurs. This will take into account any results of monitoring.	Best practice. Lenders' requirement.	Starting from the commencement of the monitoring program.	Own resources/ external contractors.	Written management plan. Internal note.	Report to lenders.
3. Others							

3.1	Report project development and performance to lenders.	<p>Prepare annual reports to lenders that will present the project development and EHSS performance for the previous year. The reports should present among others:</p> <ul style="list-style-type: none"> • status of the project implementation; • KPIs; • summary of submitted grievances and description of how these have been addressed; • summary of stakeholders engagement activities; • environmental monitoring results and discussion; • summary of actions undertaken to improve EHSS performance of the wind farm; • summary of any EHSS legislative changes that may affect the project. 	Best practice. EP10 IFC PS1	First report in 2015, onwards.	Own resources/ external consultant.	Annual reports to lenders, presented by the end of 1 st quarter each year.	Present annual reports to public
3.2	Undertake independent EHSS audit of the project every 3 years.	Every three year undertake audit of the wind farm EHSS status and performance.	EP 9	First report in 2018	External consultant approved by the lenders	Audit report.	
3.3	Undertake additional assessment of Phase III of the Project's development.	Undertake additional assessment of Phase III of the Project's development in order to assess possible impact on habitats in line with the EU Guidance of Natura 2000.	Best practice. Lenders' requirement.	Provide reports prior to start of construction works related to the Phase III of the Project's development.	External consultant approved by the lenders.	Written reports.	Report to lenders.

3.4	Implement the agreed Stakeholder Engagement Plan (SEP) in order to ensure effective communication of the investment plans, potential impacts and mitigation measures for construction and operation (i.e. maintenance activities) to communities through public meetings, publications and corporate websites..	Conduct meetings/consultations with local communities, local authorities, land owners prior and other relevant stakeholders, during construction and after each phase of the Project is accomplished and in operational stage to provide adequate information on operations and impacts of the Project as well as ensure local concerns are fully understood.	Best practice. EBRD PR 10	As soon as possible, before commencement of the construction works. Continue during the project lifetime.	Own resources/ external consultant	Written, internal meeting minutes, photos of community meetings	Report to lenders on stakeholder engagement activities
3.5	Implement the agreed Stakeholder Engagement Plan (SEP) in order to ensure effective communication of the investment plans, potential impacts and mitigation measures for construction and operation (i.e. maintenance activities) to communities through public meetings, publications and corporate websites..	Maintain effective relationships with stakeholders	EBRD PR 10	As soon as possible, before commencement of the construction works. Continue during the project lifetime.	Own resources/ external consultant	Records of grievances (including all formal and informal complaints and legal court cases) and resolutions.	Report to lenders on status of grievances