

# Environmental and Social Action Plan

Pękanino Wind Invest Sp. z o.o. and Gorzyca Wind Invest Sp. z o.o. (collectively referred to as the Project Company) are currently sponsoring the phase IIIA and phase IIIB (both referred to as the Project) of the Darłowo Wind Farm Energy Centre (DEC).

The DEC is approximately a 250MW multi-stage wind energy project in advanced development, located in the district of Sławno, near the Baltic Sea and close to the town of Darłowo, approximately 22 kilometres (km) northeast of Koszalin in northwestern Poland ("Darłowo") and between five and 16km from the Baltic Sea.

The development of the DEC has been carried out in three different main phases:

- Phase I, with a total capacity of 80MW;
- Phase II, with a total capacity of 97.5MW;
- Phase III with a total capacity of 74MW.

Phase III consists of two different sectors, named Phase IIIA and Phase IIIB.

Phase IIIA consists of 16 wind turbine generators (wind turbines) with a total capacity of 24MW and it is entirely developed within the Darłowo municipality jurisdiction. This sector is currently under operation. Its construction commenced in July 2013 and was completed in March 2014.

Phase IIIB consists of 20 wind turbines with a total capacity of 50MW and will be located within the municipalities of Darłowo and Malechowo. As of April 2014, this sector is currently receiving the relevant environmental authorisations and construction is expected to start from July 2014.

This document (specifically Table 0.1) constitutes the Environmental and Social Action Plan (ESAP) for Darłowo Wind Farm Phases IIIA and IIIB - the Project. The ESAP identifies the actions required, the basis of the requirement, the timing of the action, and the criteria for determining whether the purpose of the action has been successfully achieved.

Responsibilities for the implementation of all the actions are identified with oversight from the Project Company where responsibilities for contractors are identified. This is expected to be accomplished by inclusion of requirements in contracts and subcontracts where possible, and by direct oversight and supervision by the Project Company as needed.

This ESAP may be revised from time to time during the Project based on reviews of performance against actions identified.

# Darłowo Wind Farm Phase IIIA & IIIB, Poland

## Environmental and Social Action Plan

Table 0.1: Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
<b>1</b>	<b>PR1: Environmental and Social Appraisal and Management</b>					
1.1	<p>Where and when possible and in order to ensure that the cumulative impact is managed in an integrate manner across the whole DEC project, ensure that applicable environmental and social standards adopted for operation of the Phase IIIA and Phase IIIB are implemented across the whole DEC in terms of operational monitoring and mitigation criteria.</p> <p>Periodically update ESMP with any additional mitigation based on ongoing monitoring activities.</p> <p>Monitor compliance of contractors and sub-contractors with corporate requirements for the development and implementation of the ESMPs.</p>	Ensure environmental and social management measures prescribed within the design documentation are implemented.	EBRD PR 1 Best Practice	Project Company with assistance from external consultants / project management company. Approval by Pękanino Wind Invest Sp. z o.o. and Gorzyca Wind Invest Sp. z o.o. of all contractor management plans	<p>Framework construction ESMP produced.</p> <p>Annual reporting of compliance for Phase IIIA and Phase IIIB.</p>	<ul style="list-style-type: none"> <li>• Provide EBRD and other lenders with an updated final copy of ESMP within a year of commissioning of the wind farm;</li> <li>• Provide an update in annual report.</li> </ul>
1.2	In the event that any individual WTG operation results in unprecedented impacts not identified in the environmental reports or exceedances of environmental limits, the ESMP (after one year of operation) will include active turbine management systems as part of a planned turbine management plan.	Ensure environmental and social management measures prescribed within the documentation are implemented.	EBRD PR 1 Best Practice	Project Company with assistance from external consultants / project management company. Approval by Pękanino Wind Invest Sp. z o.o. and Gorzyca Wind Invest Sp. z o.o. of all contractor management plans	Turbine operational management plan	<ul style="list-style-type: none"> <li>• Where needed, Provide draft turbine operational management plan within a year of commissioning for Phase IIIA;</li> <li>• Where needed, Provide draft turbine operational management plan within a year of commissioning for Phase IIIB;</li> </ul>
1.3	Submit report to the investors on environmental,	To ensure measures within the	EBRD PR1	Project Company	Submission of EHS	<ul style="list-style-type: none"> <li>• Quarterly reports to be submitted</li> </ul>

## Darłowo Wind Farm Phase IIIA & IIIB, Poland

### Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	health and safety (EHS) performance, including status of each ESAP element and current status of Environmental Health and Safety issues.	EIA and permit conditions are being implemented.			reports on specified schedule.	during construction. <ul style="list-style-type: none"> <li>Annually reporting during operation six weeks after the end of the year</li> </ul>
1.4	Appoint a Community Liaison Officer (CLO) with the appropriate skills and qualifications. Activities should be aligned with the Stakeholder Engagement Plan (SEP).	To liaise with local communities and authorities on a regular basis, analyse these interactions, and provide updates and practical recommendations to the Project management team.	EBRD PR 1 EBRD PR 10	Project Company	Appointment of CLO	<ul style="list-style-type: none"> <li>Prior to financial close.</li> </ul>
1.5	Apply for, receive, and comply with all permits and authorisations.	To ensure compliance with national laws.	Polish Law EBRD PR1	Project Company	Report to Bank on permit status prior to construction.	<ul style="list-style-type: none"> <li>Prior to action requiring permit/authorisation. Permit status already advised to Banks consultants</li> </ul>
1.6	Develop a Project Environmental, Health, Management System (EHMS) in line with ISO requirements ie ISO9001 and ISO14001, to be applied for the construction of the Phase IIIB and the operation of the whole DEC Project (where and when possible). Monitor compliance of any contractors and sub-contractors with corporate requirements for the development and implementation of ISO management systems.	Promote environmental, health and safety culture within the organisation and meet international best practice. Documentation of roles and responsibilities within the Project / Parent Company and third parties	EBRD PR 1 Best Practice	Project Company with assistance from external consultants / project management company.	Evidence of working towards development of EHMS and implementation by end of 2014	<ul style="list-style-type: none"> <li>Preparation of EHMS prior to financial close for Phase IIIA.</li> <li>Preparation of EHMS prior to commencement of construction for Phase IIIB.</li> </ul>
1.7	Include clauses within the Contractors Agreement where possible that requires compliance with EU requirements.	Ensure a unified adoption of international environmental, health, safety and social standards by all parties involved in the Project.	EBRD's PRs EU, ILO	Project Company resources / possibly some minimal legal costs.	Evidence of international environmental, health, safety and social contractual obligations within contracts with contractors	<ul style="list-style-type: none"> <li>Ongoing from commencement of construction for the duration of the loan.</li> </ul>
1.8	Conduct quarterly inspections of contractors' occupational health and safety (OHS) performance. Report on performance to EBRD every six months during construction. Report frequency to	Ensure contractor adoption of EU requirements for OHS	Polish Law EBRD	Budget required for monitoring of contractor compliance	Throughout construction	<ul style="list-style-type: none"> <li>Report available and submitted to EBRD as part of annual report.</li> </ul>

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	be increased in the event of significant issues / incidents on site.					
1.9	Set up and maintain EHS incident reporting procedure to maintain records of annual monitoring, accidents and incidents. The procedure must be overarching, unique and integrated for the whole DEC Project and for the whole contractors located on site.	Set up an EHS incident reporting procedure.	EBRD PR1 Polish Law	EPC Contractor	Monthly project EHS compliance reports.	<ul style="list-style-type: none"> <li>• Prior/during the construction period. Construction is commenced. It is the legal obligation of the contractors to report incidents. Any incidences are noted in the weekly report.</li> </ul>
1.10	DEC to provide sufficient staffing to manage the environmental, health and safety and social performance of the whole DEC project.	Ensure appropriate Organizational Capacity and Competency.	EBRD PR 1	Project Company	Appointment letter of EHS Manager	<ul style="list-style-type: none"> <li>• Within six months of financial close and three months prior to the start of site mobilization.</li> </ul>
<b>2</b>	<b>PR2: Labour and Working Conditions</b>					
2.1	<p>Develop and adopt Human Resource Policy and management system covering all employees, contractors and sub-contractors, to include (but not be limited to):</p> <ul style="list-style-type: none"> <li>• Approach to managing its workforce</li> <li>• Management of worker relationships</li> <li>• Access to worker's organisations</li> <li>• Working conditions and terms of employment</li> <li>• Child labour and forced labour policies</li> <li>• Equal opportunities and non-discrimination</li> </ul> <p>Oversight provided of contractor policies/procedures</p> <p>Access by all workers to policy/procedures in their language(s)</p>	To ensure management of workforce in line with EBRD requirements, including prevention of child labour and forced labour, tolerance of workers associations, retrenchment principles and encouragement of non-discrimination.	EBRD PR 2	Project Company	<p>Development of HR policy</p> <p>HR policy/procedures developed and submitted to EBRD for review</p> <p>Report to Bank on major changes to HR policies/procedures</p> <p>Report to Bank status of contractor policy reviews</p> <p>HR Policies/procedures provided in workers' languages</p>	<ul style="list-style-type: none"> <li>• HR policy developed and adopted: prior to further construction activities.</li> <li>• Contractor policies/procedures reviewed/approved: prior to work on-site.</li> <li>• HR Policies implemented throughout construction and operation.</li> </ul>
2.2	Maintain formal grievance mechanism for employees and contractors and disseminate information about its uses to the workforce, in the language(s) of the workers.	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR 2	Project Company	Development/adoption of workers grievance mechanism.	<ul style="list-style-type: none"> <li>• Prior to further construction activities</li> <li>• Quarterly report to EBRD on grievances and resolutions proposed</li> </ul>

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
2.3	Develop Local Content Strategy.	Minimise project-induced population influx while maintaining non-discrimination in recruitment.	EBRD PR 2	Project Company and EPC contractors	Local Content Strategy adopted and cascaded to sub-contractors.	<ul style="list-style-type: none"> <li>• Prior to recruitment of construction staff</li> </ul>
2.4	Document the Project Company's labour accommodation strategy and principles. Check existing and proposed accommodation against the strategy and update any plans if needed.	To standardise accommodation provided to workers employed by the Project Company and contractors. To minimise influx impacts.	EBRD PR 2	Project Company and EPC contractors	Labour accommodation strategy documented and cascaded to contractors.	<ul style="list-style-type: none"> <li>• Prior to construction of any future labour accommodation or labour being accommodated at site by the Project Company</li> </ul>
2.5	Develop an integrated Occupational Health and Safety Advisory Services (OHSAS) and nationally compliant Occupational Health and Safety Plan, monitoring and management system to cover any operation of the DEC Project. The system should cover: <ul style="list-style-type: none"> <li>• Job- and task-specific hazard analysis and controls</li> <li>• PPE requirements and enforcement mechanisms</li> <li>• Designation and enforcement of smoking/no-smoking areas</li> <li>• Safety training for all personnel in their own language(s)</li> <li>• Review of contractors OHS plans, to meet same standards as Project Company plan</li> <li>• Oversight of contractor OHS development / implementation, including mandatory reporting to Project Company</li> <li>• Record-keeping, including total work-hours, lost work-hours due to accidents/incidents, description of lost-time incidents, hospitalizations, fatalities</li> <li>• Toolbox talks to share information on risks,</li> </ul>	To minimise risks of Occupational Health and Safety accidents and incidents.	EBRD PR 2	Project Company	OHS Plan adopted and cascaded to contractors. Report to EBRD on status of plan development and on OHS performance, including work-hours, lost-time incidents, major accidents, fatalities (including actions taken in response to accidents)—include contractor data separately and combined	<ul style="list-style-type: none"> <li>• Immediately</li> <li>• Approved plan(s) in place throughout construction and operation</li> </ul>

## Darłowo Wind Farm Phase IIIA & IIIB, Poland

### Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	accident prevention, etc. The same integrated document must be applied to all parties involved in the construction and operation of the Project.					
2.6	Supply chain audits for low labour cost supply items and any other at-risk suppliers.	To prevent child labour or forced labour in the supply chain.	EBRD PR 2	Project Company	Supply chain audits completed and provided to Bank	<ul style="list-style-type: none"> <li>• First audit in the first quarter following construction commencement</li> <li>• Second audit in the first quarter following operation commencement</li> </ul>
<b>3</b>	<b>PR3: Pollution Prevention and Abatement</b>					
3.1	Integrate and maintain mitigation measures identified in the construction ESMP into contractor policies and method statements.	Promote environmental, health and safety culture within the organisation and meet international best practice.	EBRD PR 3 Best Practice Polish Law	EPC Contractor	Plans and method statements from contractors on implementation of mitigation measures.	<ul style="list-style-type: none"> <li>• Prior to construction.</li> </ul>
3.2	Noise monitoring plan to be developed in accordance with condition in the Project environmental permit during operation. Noise monitoring plans may be updated based on the outcomes of the grievance mechanism Additional mitigations to be applied if required following noise monitoring where necessary and defined in EMP.	To not cause unacceptable levels of disturbance to local residents and ensure	EBRD PR 3 Polish Law	Project Company / external consultant	Provision of reports to Regional Directorate of Environmental Protection in Szczecin and Bank for third party review. Approval from Regional Directorate of Environmental Protection in Szczecin.	<ul style="list-style-type: none"> <li>• Following release of the environmental authorisations. This may be updated based on the outcomes of the grievance mechanism</li> </ul>
<b>4</b>	<b>PR4: Community Health, Safety and Security</b>					
4.1	Implementation of safe practices during construction to minimise potential impacts to local communities during construction to include: <ul style="list-style-type: none"> <li>– Construction vehicles to keep to agreed access routes and adhere to speed limited</li> <li>– Information boards about public safety hazards and emergency contact information</li> </ul>	Promote good practice during construction and to protect the health and safety of local communities.	Best Practice EBRD PR 4 Polish Law	Project Company	Success of implementing actions identified.	<ul style="list-style-type: none"> <li>• Throughout construction.</li> <li>• Throughout operation</li> </ul>

## Darłowo Wind Farm Phase IIIA & IIIB, Poland

### Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	<p>to be made available at the wind farm site.</p> <ul style="list-style-type: none"> <li>– Hazardous materials and wastes stored on site to prevent community exposure to these substances.</li> <li>– Areas with high voltage equipment should be securely fenced off to prevent access.</li> <li>– Wind turbine safety data sheets to be adhered to at all times.</li> </ul>					
4.2	Develop an integrated Emergency Preparedness and Response Plan (EPRP) for the whole DEC project, in consultation with contractors, sub-contractors, local emergency service providers and commune authorities.	Be prepared for Project and local emergencies.	EBRD PR 4	Project Company	EPRP shared with Bank including consultation details	<ul style="list-style-type: none"> <li>• Prior to financial close</li> </ul>
4.3	Periodic awareness raising and feedback sessions with communities about potential, real and perceived health impacts of living near wind farms, and in particular the Project.	Build greater understanding among local communities. Greater understanding for Project Company around specific risks to groups and communities.	Best Practice	Project Company with assistance from external consultants	Session minutes	<ul style="list-style-type: none"> <li>• First sessions can be combined with formal public meetings (as described in the SEP)</li> <li>• Subsequent sessions should be held as per community needs, no less than once in two years.</li> </ul>
4.4	Develop and enforce code of conduct that is part of workers' contracts, to include, but not be restricted to, rules on interactions with local communities to prevent conflicts with local residents or other disruptions. This must also be applicable to contractors.	Prevent conflicts between workers and local communities	EBRD PR 4 Best practice	Project Company	Code of conduct developed and enforced No serious incidents between workers and local communities Report to Bank any incidents	<ul style="list-style-type: none"> <li>• Prior to any further construction work</li> </ul>
4.5	Conduct due diligence investigation for all security personnel to make sure they have appropriate licensing, experience and training, or conduct equivalent due diligence of security contractor.	Prevent conflict between security personnel and local communities Prevent potential human rights violations by security personnel	EBRD PR 4 Best Practice	Project Company	Due diligence carried out and documented Report to Bank any incidents involving security guards	<ul style="list-style-type: none"> <li>• Prior to any further construction work</li> </ul>
5	<b>PR5: Land Acquisition and Involuntary</b>					

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
<b>Resettlement</b>						
5.1	Provide training in international good practice in Project related land acquisition to members of Project Company staff directly involved in land negotiations.	Ensure that members of staff involved in sensitive negotiations are equipped with the required skills for the job.	EBRD PR 1 Best Practice	Project Company with assistance from external consultants	Training plan with completion signatures	<ul style="list-style-type: none"> <li>• Prior to further negotiations</li> </ul>
5.2	<p>Develop and disclose a Livelihoods Restoration Framework (LRF) including a Grievance Mechanism.</p> <p>Ensure LRF includes non-monetary livelihood restoration measures (such as skills training) as well as basic compensation for acquired land and access rights. The LRF should include a consideration of extending non-monetary measures to the wider community (not just affected parties).</p> <p>Develop a framework of compensation rates and packages through consultation with affected landowners.</p>	<p>To set out the Project Company's land acquisition principles, the regulatory framework, implementation steps and schedule, as well as documentation and monitoring requirements.</p> <p>To give affected persons the opportunity to participate in the negotiation of the compensation packages, eligibility for compensation and other livelihoods restoration measures, resettlement assistance, and suitability of proposed resettlement sites if any and the proposed timing.</p>	EBRD PR 5	Project Company with assistance from external consultants	LRF and land acquisition Grievance Mechanism shared with Bank and disclosed to public.	<ul style="list-style-type: none"> <li>• Immediately</li> </ul>
5.3	Identify vulnerable groups and determine assistance requirements and means of ensuring meaningful participation in livelihoods restoration process.	To avoid differential impacts of land acquisition on vulnerable groups.	EBRD PR 5	Project Company with assistance from external consultants	SEP updated with vulnerable groups. Specific measures for vulnerable groups included in LRF	<ul style="list-style-type: none"> <li>• Immediately</li> </ul>
5.4	Gap analysis of on-going land acquisition and compensation process against the LRF. Implement gap filling actions, including making retrospective payments, where needed.	To mitigate the impacts of economic displacement on affected parties.	EBRD PR 5	Project Company with assistance from external consultants for the gap analysis	Gap analysis submitted to the Bank Completion audit to Bank.	<ul style="list-style-type: none"> <li>• Prior to further construction</li> </ul>
6	<b>PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>					



Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
6.1	<p>Additional Habitats Regulations Assessment (HRA) studies to determine whether any adverse impacts area likely to affect the integrity of qualifying features to the Natura 2000 sites in the Project's area of influence. This includes an HRA Screening Matrix (Stage 1) and subsequent Appropriate Assessment (Stage 2), if screening indicates that further assessment is required.</p> <p>The HRA is to consider the cumulative effects of Phases IIIA and IIIB with Phases I, II of the Darlowo Energy Centre and other existing and planned wind farm sites in the Project's area of Influence.</p>	To meet international best practice requirements	EBRD PR 6 Habitats Directive EIA Directive	• Project Company	HRA Screening Matrix (Stage 1) and subsequent Appropriate Assessment (Stage 2) if screening indicates that this is necessary.	• Prior to construction commencing.
6.2	<p>The following management measures are to be undertaken in relation to birds:</p> <ul style="list-style-type: none"> <li>• Undertake monitoring visits for Phase IIIB during the migratory periods (March/April and August to October) to provide up-to-date information on flight activities of birds in the Project area. If feasible, coordinate these surveys with the surveys being carried out for Phases I and II to assess collision risk.</li> <li>• Undertake a survey for breeding birds (scope to be defined and agreed) in order to assess the impacts of habitat loss and disturbance for Phases IIIA and IIIB.</li> <li>• Retain an ornithologist team to undertake monitoring visits during operation of the wind farm in accordance with the timescales set out in the Environmental Permit for Phase IIIA and, if required, for Phase IIIB. Focus monitoring on those species that are qualifying features of the Przybrzeżne wody Bałtyku SPA (PLB990002), the bird species in the Dolina Wieprzy i Studnicy SAC (PLH220038) and corncrake, lesser spotted eagle and white-</li> </ul>	<p>To meet national permitting and international best practice requirements</p> <p>To minimise impacts of the Project on bird species.</p>	EBRD PR 6 Polish Law Bird Directive EIA Directive	• Project Company / operator of the wind farm (maintenance and service is done by a third party)	Bird monitoring report from each survey period.	<ul style="list-style-type: none"> <li>• Detailed scope of surveys and monitoring activities to be set and agreed before commencement of construction.</li> <li>• Operational survey work to be provided as part of quarterly report to EBRD.</li> <li>• Bird monitoring reports to be submitted to stakeholders and Regional Directorate of Environmental Protection in Szczecin in accordance with Environmental Permit conditions.</li> </ul>

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	<p>tailed eagle in the Dolina Grabowej SCI (PLH320003).</p> <ul style="list-style-type: none"> <li>• A monitoring plan should be put in place for both the construction and operation phases to monitor potential impacts on avi-fauna. A series of monitoring plans should be available for other wind farms located in the site's surroundings (when publically available). Any relevant outcomes from these studies should be reviewed in order to create a more reliable understanding of the risks and accordingly address the impacts in a more effective manner.</li> <li>• The monitoring plan is to identify the management measures that will be employed in the event of new impacts on birds are identified. This may include among others:               <ul style="list-style-type: none"> <li>– Modifications to the operation of the WTGs, for example, adjustment of the rotation speed during sensitive periods for some areas of the wind farm; and/or</li> <li>– Curtailment (shut-down); this involve the interruption of operation for specific WTGs during high risk periods (most likely during migration and during certain weather conditions, e.g. when visibility is low)</li> </ul> </li> <li>• When technically and economically feasible and at least for one survey task, the methodology of the_bird monitoring should make use of (but it will not limited to) radar equipment as part of the monitoring programme. Activities must be carried out by an independent ornithologist/bat team and reviewed and approved by an independent expert.</li> </ul> <p>See also measures under item 6.5.</p>					

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
6.3	<p>The following management measures are to be undertaken in relation to bats:</p> <ul style="list-style-type: none"> <li>• Carry out a bat monitoring survey for Phase IIIB</li> <li>• Identification of bat roosts (pipistrelle, serotine and noctule bats) during the breeding period to identify nursing sites in the Project area and any roosts that are at risk from Phases IIIA and IIIB, both alone and in combination with other wind farms in the Project's area of influence.</li> <li>• Acoustic monitoring to assess general activity and abundance of bats to be continued post-construction, using the same methods as for surveys undertaken in 2012/2013.</li> <li>• When technically and economically feasible and at least for one survey task, the methodology of bats monitoring should make use of (but it will not be limited to) radar equipment as part of the monitoring programme. Activities must be carried out by an independent ornithologist/bat team and reviewed and approved by an independent bat expert.</li> <li>• An independent bat expert shall establish and oversee a bat mortality monitoring program, with specialist training provided to enable operational personnel to monitor for carcasses.</li> <li>• Bat monitoring data shall be reviewed by the independent expert and in the event that high rates of bat mortality are determined, additional mitigation shall be implemented and the turbine operational management plan updated. If required this will include, among others:</li> </ul>	To minimise likely impacts of the Project on bat species.	EBRD PR 6 Polish Law Habitats Directive EIA Directive EUROBATS	<ul style="list-style-type: none"> <li>• Project Company / operator of the wind farm (maintenance and service is done by a third party)</li> </ul>	<p>Pre-construction bat risk assessment reports with mitigation measures, as required.</p> <p>Provision of annual monitoring reports for operational monitoring. If necessary, an updated turbine operation management plan to be provided.</p>	<ul style="list-style-type: none"> <li>• Detailed scope of surveys and monitoring activities to be set and agreed before commencement of construction.</li> <li>• Following commencement of operation, operational survey work to be provided as part of quarterly report to EBRD.</li> <li>• Annual update of turbine operation management plan, as required.</li> </ul>

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	<ul style="list-style-type: none"> <li>– Raising the cut-in wind speed from one hour before sunset to an hour after sunrise in most critical periods (in principle from May to September);</li> <li>– Determination of the thresholds at which the rotor speed of turbines is reduced; and/or</li> <li>– Individual turbines switch-off under specified meteorological conditions shall be altered to minimise likely impacts on bats.</li> </ul>					
6.4	<p>Development of a ‘habitat rehabilitation plan’ as well as any mitigation measure resulting from EMP implementation.</p> <p>Review progress against plan in biannual reports.</p>	To return natural habitats to their original state following construction activities having taken place.	EBRD PR6 National law EC Directives	• Project Company	<p>Plans developed.</p> <p>Minimised clearing of natural vegetation.</p> <p>Successful re-vegetation of land.</p> <p>Quarterly update in EHS report.</p>	• Monitoring reports provided quarterly throughout construction as part of project EHS compliance reports.
6.5	<p>Habitat rehabilitation to include where possible enhancements of areas outside the wind farms for bats and key bird species such as lesser spotted eagle, white-tailed eagle, storks and crane, as well as geese and other wildfowl.</p> <p>Habitat management actions as indicated in mitigation sections of EIAs to include measures such as mowing meadow grass near eagle breeding grounds. This should be carried out using methods that minimise risks to reptiles.</p>	To attract bats and birds away from wind farm areas and as such to reduce the risk of collision.	EBRD PR6 National law EC Directives	• Project Company / operator of the wind farm (maintenance and service is done by a third party)	<p>Planting plans developed.</p> <p>Successful increase in use of enhanced areas by birds (to be gleaned from bird monitoring under item 6.2)</p> <p>Quarterly update in EHS report.</p>	• Monitoring reports provided quarterly throughout construction as part of project EHS compliance reports.
8	<b>PR8 Cultural Heritage</b>					•
8.1	<p>Develop a chance find procedure for use during construction</p> <p>Train workers in the implementation of the chance find procedure</p>	To ensure that any archaeological finds will be preserved during the construction process.	EBRD PR 8	Project Company	<p>Chance Finds Procedure adopted.</p> <p>Workers trained in implementation.</p>	• Prior to any further construction.
8.2	Incorporate community concerns around existing known cultural heritage (eg churches), if any are	To minimise impacts to and community grievances around	EBRD PR 8	Project Company	Management systems updated if applicable.	• As and when concerns are raised.

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	reported during initial village level and commune level consultations, into integrated management systems.	cultural heritage				
10	<b>PR10 Information Disclosure and Stakeholder Engagement</b>					•
10.1	Update Stakeholder Engagement Plan with all communities within 3km of Project and contact details of community leaders.	To maintain good stakeholder engagement and framework for sharing information with the public.	EBRD PR 10	Project Company	SEP updated. SEP submitted to the Bank	<ul style="list-style-type: none"> <li>• First update prior to financial close.</li> <li>• Subsequent updates at regular intervals throughout construction and operation.</li> </ul>
10.2	Implement the SEP, including immediate stakeholder engagement and stakeholder grievance mechanism. As part of the SEP maintain a register of external communications including minutes of meetings held with stakeholders.	To maintain good stakeholder engagement and framework for sharing information with the public.	EBRD PR 10	Project Company	Report to Bank on consultation activities, including information disclosed.  Report to Bank on all grievances received and how addressed/ resolved.	<ul style="list-style-type: none"> <li>• Commence implementation immediately.</li> <li>• Continue throughout construction and operation.</li> </ul>
	Develop a Project website to be used to disclose Project information and documentation, such as the SEP and its associated documents.	To generate an accessible channel of information disclosure and feedback loop.	EBRD PR 10	Project Company	Project website created and link disseminated to stakeholders and Bank.  SEP updated to include the website link.	<ul style="list-style-type: none"> <li>• Prior to financial close</li> </ul>
10.3	Disclose Community Investment / Corporate Social Responsibility (CI / CSR) plan outlining the Project Company's principles and criteria for selecting CI / CSR contributions, recent activities and their beneficiaries.	Transparency around CI / CSR initiatives.	Best Practice.	Project Company	CI / CSR plan disclosure on Project website	<ul style="list-style-type: none"> <li>• Immediately</li> </ul>
10.4	Publish a Corporate Social Responsibility (CSR) report.	Enhancing stakeholder communication	EBRD PR 10 recommendation  Best Practice	Project Company with external support if required	CSR report published 2014.	End of financial year 2014-2015
10.5	Maintain awareness of government led	Anticipate stakeholder	Best	Project Company	Report to Bank on	Throughout construction and

Darłowo Wind Farm Phase IIIA & IIIB, Poland  
Environmental and Social Action Plan

Item No.	Task / Measure / Corrective Action	Purpose of Action	Source of Requirement	Responsibility	Deliverable and Measure(s) of Progress/Success	Timescale
	stakeholder engagement on relevant issues, especially spatial planning in Darłowo and Malechowo.	concerns or grievances that may affect Project stakeholder relations and give rise to concerns around the Project.	Practice		relevant stakeholder engagement activities attended, and any implications for the Project.	operation.