

Stakeholder Engagement Plan

Vutcani Extension Wind Farm, Romania

February 2013



| Issue/revision | Issue 1 | Revision 1 | Revision 2 | Revision 3 |
|----------------|------------------|------------------|------------|------------|
| Remarks | Draft | Final | | |
| Date | December 2012 | February 2013 | | |

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1 Introduction

1.1 BACKGROUND

This document is a **Stakeholder Engagement Plan (SEP)** for Vutcani Extension Wind Farm, Moldova Region, Romania and describes public relations and communication plans, regarding the operations and major investment programmes planned in future.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that EDP Renewables (the owner of Vutcani Extension Wind Farm) will adopt and those which will be used for major investment programmes.

The SEP will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary.

The specific objectives of the SEP are detailed below.

1.2 OBJECTIVES OF THE PLAN

The methods, procedures, policies and actions undertaken by EDP Renewables to inform stakeholders, in a timely manner, of the potential impacts of projects are the key subject of this document.

Previous stakeholder engagement activities are documented in this SEP.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact Laura Lazar (Environment & Sustainability) at EDP Renewables (contact details provided above) and ask to be included in the future information and communication. Furthermore, this document describes the way that any concerns or grievances will be handled by EDP Renewables for the Vutcani Extension Wind Farm site.

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

1.3 SCOPE OF THE PLAN

This document covers the following:

- Chapter 2 – Project descriptions, location of the site and key environmental and social issues;
- Chapter 3 – Identification of stakeholders and other affected parties, and details of public consultations and information disclosure requirements;
- Chapter 4 – Overview of existing stakeholder engagement activities, and summary of the methods of future engagement activities; and
- Chapter 5 – Stakeholder engagement programme and methods of engagement and resources, monitoring and reporting mechanisms, and grievance mechanism;

2 Project Description

2.1 OVERVIEW OF THE PROJECT

The Vutcani Extension wind farm comprises 14 wind turbines (turbine model VESTAS V100 2.0MW), providing a total power of 28 MW. Each wind turbine consists of a hollow steel tower with a generator nacelle which houses and protects the main components of the rotor blades, gear box, transformer and control systems. The turbines each have a total height of 145 m (comprising 95 m tower and 50 m rotor blade above the tower height) The turbines are connected, through 20kV underground cables and junction stations which are connected to a transformer station within the wind farm and this is then be connected to the nearest E.ON Romania transformers.

The total area occupied by the wind farm is ~ 83 ha from wich ~ 1,92 ha are affected by wind farm construction (internal roads, foundations, platforms of wind turbines, electrical substation 20/110 kV). The remaining land will be used for agricultural use. The land which was temporarily disturbed during the construction works has been restored. The proposed layout of the wind farm at Vutcani Extension is shown on Figure 1.

The Project has already obtained Construction Authorisations and Environmental Agreement (in line with Romanian legal requirements). It is now in the construction phase and it's going to be operational in May 2013.

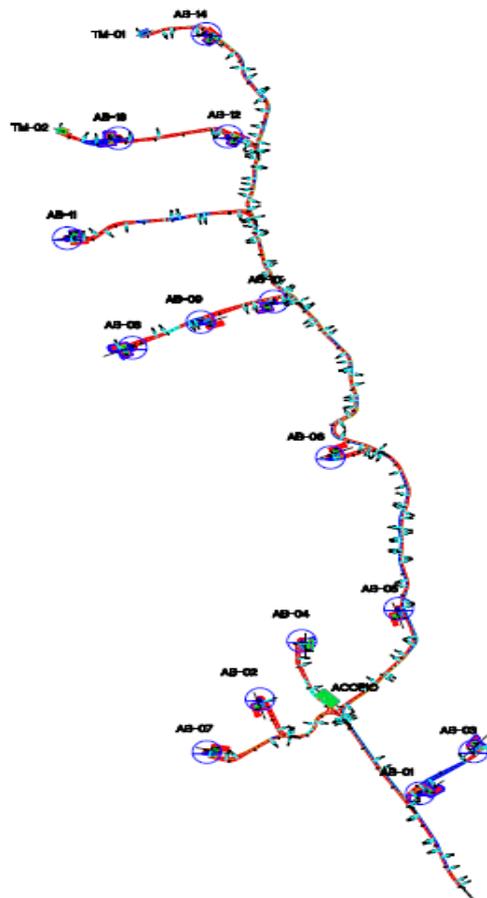


Figure 1: Vutcani Extension Wind Farm Turbine Layout Plan

2.2 SITE SETTING AND LOCATION OF THE WINDFARM

The Vutcani Extension wind farm is located within Moldova area, and is approximately 4.7 km from Albesti, 4 km from Oltenesti, 11 km from Costesti, 7 km from Codreni and 5.5 km from Vutcani localities, as shown on Figure 2. These localities are rural in character and are situated along water courses, roads and farmland.

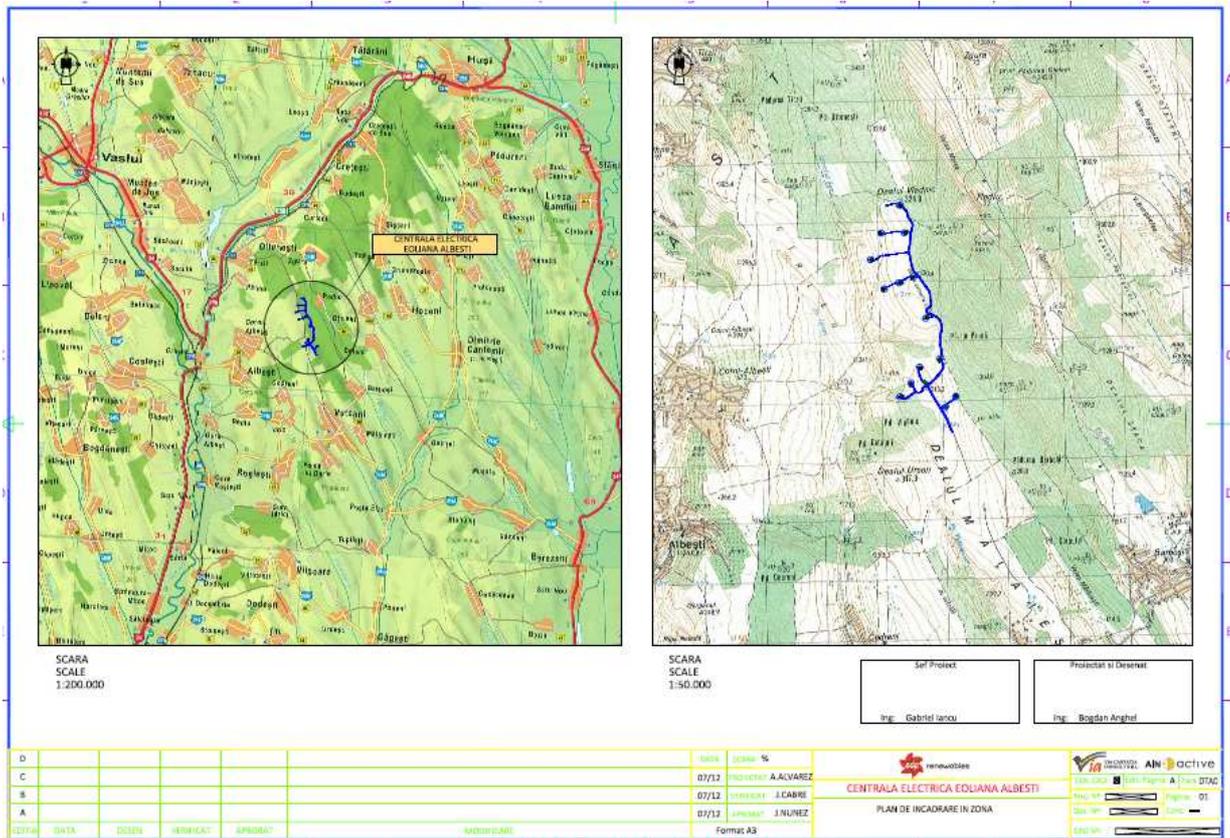


Figure 2 Vutcani Extension Wind Farm Setting and Context

The Site covers an area of ~83 ha and is on land which is privately owned by EDPR. The land has limited agricultural value and is used for crop production, including wheat. Within the Site there are no forested areas or rare/sensitive plant species. Agricultural land use is not colonised other than by grasses and plants which are fast growing and tolerant to the environmental conditions. Water resources are limited, with no irrigation systems in place.

The access is made using county road DJ224b and links with national road DN28b between Iasi-Barlada and Vutcani.

The Vutcani Extension wind farm is not located within the boundary of any protected areas, including Natura 2000 sites such as Special Protected Areas (SPAs), Sites of Community Importance (SCIs) and International Bird Areas (IBAs).

The nearest Natura 2000 area is ROSCI 0213 raul Prut situated at approximately 30 km distance from Vutcani Extension WF.

2.3 CONSULTATION AND DISCLOSURE

Public consultations and information disclosure undertaken by EDP Renewables will comply with the requirements of the legislation of Romania and best international practice, as described in the requirements of the **International Finance Corporation (IFC)**.

National Legislation Requirements

EDP Renewables consulted with the authorities to determine if an EIA was required for the development of Vutcani Extension Wind Farm. It was confirmed that there were no significant environmental issues associated with the development and therefore, an EIA was not required. The company has also consulted with authorities in order to obtain the necessary certificates and licences to construct, operate and sell power to the grid and commits to do so for any future expansions. Public consultations with local communities have also been undertaken during the course of the project.

International Finance Corporation (IFC) Requirements

Stakeholder engagement is an integral part of IFC Performance Standard 1, which requires that a Stakeholder Engagement Plan (SEP) be developed for all projects with adverse impacts on local communities, commensurate to the risks and impacts of the project concerned. Disclosure of relevant project information is required to help Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. IFC clients are required to provide Affected Communities with access to relevant information on the purpose, nature, and scale of the project; the duration of proposed project activities; any risks to and potential impacts on such communities and relevant mitigation measures; the envisaged stakeholder engagement process; and a Grievance Mechanism.

A consultation process is required to provide Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allow the client to consider and respond to them.

The client will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. If clients have already engaged in such a process, they will provide adequate documented evidence of such engagement. The client will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.

Best International Practice

The key principles of effective engagement for projects are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;

- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people’s concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

These principles will be reviewed and accordingly adopted by EDP Renewables for the Vutcani Extension Wind Farm dependent of the nature and size of future projects undertaken.

General Stakeholder Communication Records Maintenance

Communication records will be maintained by EDP Renewables clearly logging the key information provided to stakeholders and also the key incoming communications (i.e. general questions, complaints etc.) relating to the Vutcani Extension site along with a summary of actions taken.

As part of this communications procedure, EDP Renewables will record and update these ongoing stakeholder engagement activities on an on-going basis.

3 Stakeholder Identification

3.1 IDENTIFICATION OF MAIN STAKEHOLDERS

Overview

This section of the document identifies interested parties i.e. stakeholders and others affected at a local, district and regional level.

Stakeholders could also be individuals and organizations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views.

In order to identify key stakeholders, the following definitions have been applied:

- **Stakeholders:** any person, group or organization with a vested interest in the outcome of a body of work; and
- **Key stakeholders:** any stakeholders with significant influence on or significantly impacted by, the work and where these interests and influences must be recognized if the work is to be successful.

There are partnerships and formal advisory arrangements and also less formal but important relationships with groups or individuals with a particular interest in the work that EDP’s Vutcani Extension site undertakes.

Stakeholders can be grouped into the following categories:

- International.
- Government (Romanian state / regional and local).
- Advisory non-government.
- Services / suppliers.
- Clients.
- Institutions (universities, think tanks, etc.).
- The power and renewables sector.
- Internal stakeholders (Employees).
- General communities.
- Public groups - nearby hospital, local schools, institutions of national heritage.
- The media.

If you are not on the list and would like to be kept informed about the project, please contact:

Contact: EDP Renewables

Name: Laura Lazar – Environment & Sustainability

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Bucharest, Romania

E-mail: LauraLazar@edpr.com

Tel: +40 21 204 03 07

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3.2 STAKEHOLDERS APPROACHED DURING THE DEVELOPMENT OF THIS PLAN

A number of stakeholders have been approached during the development of this Stakeholder Engagement Plan and during the project. These include:

- Council Vaslui;
- Local Council Vutcani;
- Local Council Albesti
- Societatea Ornitologica Romana (SOR);
- National Environmental Protection Agency, Bucharest;
- Environmental Protection Agency Vaslui;
- Local communities - Vutcani Council Members and local residents.

All the key stakeholders identified are presented in Table 1 below.

| Stakeholder Groups | Key Stakeholders | Summary of Specific interest |
|--|---|---|
| <p><i>Government (Romanian state/territory and local)</i></p> | <ul style="list-style-type: none"> <li data-bbox="461 233 1507 352"> <p>■ County Council Vaslui <i>Stefan cel Mare Street, nr.79, Vaslui, 730168, județul Vaslui</i> <i>Phone: +40 (0) 235-361.089, +40 (0) 235-361.096 Fax: +40 (0) 235-361.091, +40 (0) 235-361.090</i> <i>Web: http://www.cjvs.ro/ Email: consiliu@consiliu.vaslui.ro</i></p> <li data-bbox="461 392 1507 488"> <p>■ Local Council Vutcani <i>Str. Principala, Vutcani, 737620, judetul Vaslui</i> <i>Phone: +40 (0)235 429 031 Fax: +40 (0)240 563 511</i></p> <li data-bbox="461 528 1507 624"> <p>■ Local Council Albesti <i>Str. Principala, Albesti, judetul Vaslui</i> <i>Phone: +40 (0) 235.344.002</i></p> <li data-bbox="461 663 1507 767"> <p>■ National Environmental Protection Agency, Bucharest <i>Splaiul Independentei, nr.294, Sector 6, București, 060031</i> <i>Phone: +40 (0) 21-207.11.01; +40 (0) 21-207.11.02 Fax: +40 (0) 21-207.11.03</i> <i>Web: http://www.anpm.ro/ Email: office@anpm.ro</i></p> <li data-bbox="461 807 1507 919"> <p>■ Local Environmental Protection Agency, Vaslui <i>Judetul Vaslui, Călugăreni Street, nr.63, 730149, Vaslui</i> <i>Phone: +40 (0)335 401 723; +40 (0)746 248 644 Fax: +40 (0)235 361 842</i> <i>Web: http://apmvs.anpm.ro E-mail: office@apmvs.anpm.ro</i></p> | <p><i>Local Public Administration authority at county level Coordination of the activity of the local councils, either rural or urban, in view of realisation of county interest public services</i></p> <p><i>Local Public Administration authority at local Level</i></p> <p><i>Environmental Protection Authorities</i></p> <p><i>Environmental Protection Authorities</i></p> |
| <p><i>Advisory / Non-government Organisations</i></p> | <ul style="list-style-type: none"> <li data-bbox="461 960 1507 1074"> <p>■ Societatea Ornitologica Romana (SOR) <i>Bd. Mihail Kogalniceanu, nr.49, Sc. A Etaj 1 Ap. 8 Cod 050108, Sector 5, Bucuresti</i> <i>Phone.: +40 (0)31 425 56 57 Fax: +40 (0)31 425 56 56</i> <i>Web: http://www.sor.ro</i></p> | <p><i>Expertise on birds</i></p> |
| <p><i>Internal stakeholders (Employees, labour unions)</i></p> | <ul style="list-style-type: none"> <li data-bbox="461 1094 1507 1206"> <p>■ Internal Employees</p> | <p><i>Internal training</i></p> <p><i>Employment and social policy & procedures</i></p> |
| <p><i>Public groups</i></p> | <ul style="list-style-type: none"> <li data-bbox="461 1228 1507 1252"> <p>■ Local communities - Council Members of Vutcani, Albesti and other Villages</p> | <p><i>Local communities</i> <i>Noise</i> <i>Land use and construction traffic</i></p> |
| <p><i>General communities</i></p> | <p>Residents of Vutcani, Albesti</p> | <p><i>Noise</i> <i>Land use and construction traffic</i></p> |

In general, the media are considered as stakeholders by EDP Renewables, however these details are provided in the next section, where the methods of communication including via the media are demonstrated.

The identification of stakeholders will be reviewed and the range of interested parties can be expanded and contracted as required during the project implementation.

4 EDP Renewables Stakeholder Relations

4.1 OVERVIEW OF EXISTING STAKEHOLDER AND COMMUNITY RELATIONS

The key benefit of this project is the use of reliable renewable wind power technology which will achieve significant greenhouse gas emissions (GHG) savings as opposed to the use of power generation plant using fossil fuels. In addition, the wind farm has created local employment.

Consultation meetings were held with Vaslui County Council, representatives of Vutcani and Albesti Local Councils and Environmental Protection Agency as part of the site permitting procedures aiming issuance of building permits.

At all stages of the project, EDP Renewables has consulted with the authorities including to determine if there is a need for an EIA and to obtain the necessary certificates and permits to construct, operate and sell power to the grid. These include:

- Environmental Agreement issued by Vaslui EPA (No. 106 dated 09.07.2012)
- Urban certificate;
- Building permit from Vaslui County Council (No. 50 dated 27.05.2010)

EDP Renewables are committed to undertaking communications with key stakeholders on future major investments and other key projects, through planning, design and project implementation. This Stakeholder Engagement Plan (SEP) has been developed, with the express objectives of identifying key stakeholders and ensuring that, where relevant, they are informed in a timely manner of the potential impacts of projects. The plan also identifies a formal grievance mechanism to be used by stakeholders for dealing with complaints, concerns, queries, grievances etc.

4.2 SUMMARY OF THE METHODS OF FUTURE ENGAGEMENT ACTIVITIES

IFC Requirements

An example table demonstrating the type of public consultation and information disclosure that will be recorded for major projects is provided in the next section. EDP Renewables will record the following information for its Vutcani Extension Wind Farm site on an ongoing basis:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, etc.), and how it was released or distributed;
- The locations and dates of any meetings undertaken to date;
- Individuals, groups, and / or organisations that have been consulted;
- Key issues discussed and key concerns raised;
- Response to issues raised, including any commitments or follow-up actions; and
- Process undertaken for documenting these activities and reporting back to stakeholders.

5 Stakeholder Engagement Programme

5.1 DISCLOSURE OF INFORMATION

The Types of Information to be Disclosed

The information that will be disclosed will be assessed on a specific project by project basis. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation.

The Methods of Communication

In general terms, internal and external communications are handled by EDP Renewables in a number of ways.

The types of information disclosed and the specific methods of communication to be undertaken by EDP Renewables for the Vutcani Extension Wind Farm site are summarized in the Stakeholder Engagement Programme in Table 2 below.

5.2 THE FUTURE PROGRAMME

Sources for the communication of information will be presented at key locations these will include information presented on notice boards at the sites and the local villages.

The Non-Technical Summary (NTS) of the Project and the Environmental Impact Assessment (EIA) Report is included on the EDP Renewables website and at the following key locations:

EDP web site: <http://www.edprenovaveis.com/>

(under the link: sustainability/EDPR in the community/Romania sustainability)

Also at the following:

EDP Renewables Romania Office

Rosetti Tower Office Building
Maria Rosetti st 6, 3rd floor
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Fax: +40 21 201 08 92

Contact

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Str. Principala,
Vutcani, 737620
judetul Vaslui
Tel: +40 23 542 9031
Fax: +40 24 056 3511

In addition, this Stakeholder Engagement Programme (SEP) are also included on the EDP Renewables website.

EDP Renewables will collate any comments and feedback associated with future projects and will document these. All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within the 'Consultation and Disclosure' section provided in Section 2.3.

All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed on the outcome.

The future programme of engagement is presented below which will be reviewed and updated on an on-going basis.

Table 2: Stakeholder Engagement Programme

| Activity / Project | Type of information disclosed | Locations and dates of meetings / forms of communication | Stakeholder Groups consulted |
|--|---|---|------------------------------|
| Annual reporting to investors | Annual reports of social development, environment protection and implementation of Stakeholder Engagement Plan including resolution of grievances associated with the project. | One year after loan signing agreement / reports provided annually comprising: - ESAP status - Resolution on grievances - Power generation. | Disclosure to investors |
| Monitoring programme to assess the impacts to birds and bats that may be occurring during the operational phase of the wind farm | Statistics and recorded data to comprised: <ul style="list-style-type: none"> ■ Bird monitoring to include recording the flying height; maximum approach height towards the wind turbines; modifications of any migration routes; ■ Identification of breeding birds in the area. ■ Monitoring of species of birds or bats found dead near the wind farm. | Commence when wind farm becomes operational and the Environmental License is obtained | Disclosure to EPA and SOR. |

5.3 MONITORING, REPORTING AND FEEDBACK MECHANISMS

Through communication channels such as media, one-to-one meetings and the periodic meetings, EDP Renewables will monitor and provide feedback as appropriate.

General information on the Vutcani Extension Wind Farm project will be periodically updated on the EDP Renewables website at:

<http://www.edprenovaveis.com/>

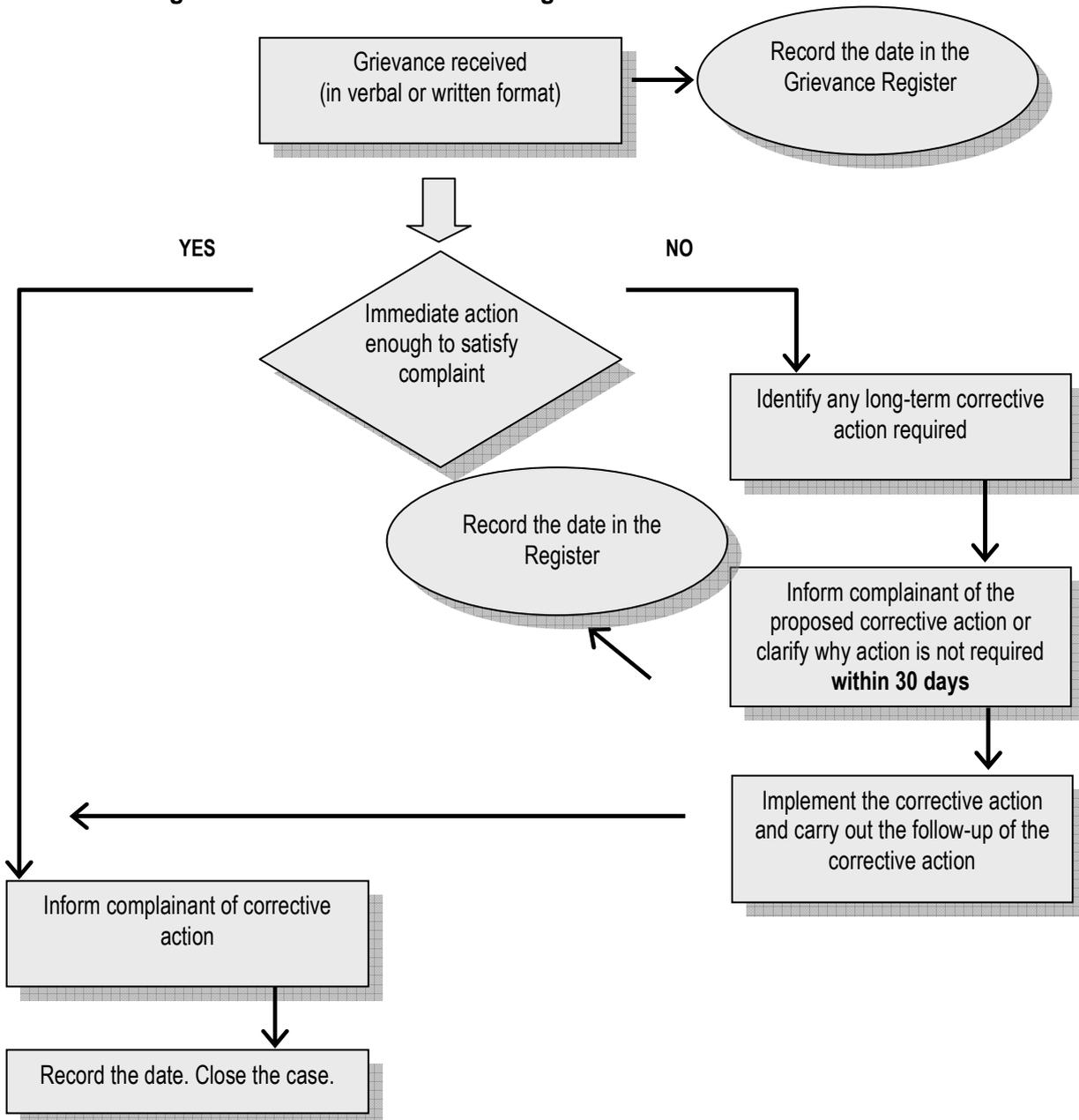
5.4 GRIEVANCE MECHANISM

A grievance mechanism will be adopted as presented in Figure 3 in which the grievance form presented below will be used as required to handle grievances from nonemployees. The assessment of grievances will be carried out in accordance with Romanian Law and responses will be provided within one month on a grievance being lodged. The mechanism will be as follows:

- Grievance received;
- Grievance recorded in a register;
- For an immediate action to satisfy the complaint, the complainant will be informed of corrective action;
- Implement corrective action, record the date and close case;
- For a long corrective action, the complainant will be informed of proposed action; and
- Implement corrective action, record the date and close case.

A grievance should be recorded by the complainant using the grievance form below, ensuring that contact details are provided with the preferred method and language of communication. A clear description should be provided of the incident or grievance. EDP Renewables will respond to grievances within one month of receiving the form.

Figure 3: Flowchart for Processing Grievances



Public Grievance Form

| | |
|--|--|
| Reference No: | |
| Full Name | |
| Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail). | By Post: Please provide mailing address: _____ _____ _____ _____ |
| | By Telephone: _____ |
| | By E-mail _____ |
| Preferred Language for communication | [Romanian] [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 | One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem) |
| | |
| What would you like to see happen to resolve the problem? | |
| | |

Signature: _____

Date: _____

Please return this form to:
 Laura Lazar, Environment & Sustainability
 Edp Renewables,

Address: Rosetti Tower Office Building, Maria Rosetti st 6, 3rd floor, Sector 2, Bucharest, Romania

E-mail: LauraLazar@edpr.co