# Non-technical summary

# Grajewo wind farm

## VOCABULARY

| | |
|---|---|
| Project owner | CONTINO OMIKRON Sp. z o.o. |
| Investor | CONTINO OMIKRON Sp. z o.o. |
| Developer | GEO Renewables S.A. |
| EBOR | European Bank for Reconstruction and Development |
| Project | Grajewo wind farm (Grajewo WF) |
| OOŚ Act | Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments |
| MPZP | Local Spatial Development Plan |
| DŚU | Environmental permit |
| EIA procedure | Procedure of the environmental impact of the investment |
| Environmental impact assessment report | Environmental impact report |

# 1. INTRODUCTION

GEO Renewables Company, acting on behalf of CONTINO OMIKRON, is developing the Grajewo Wind Farm Project located in Podlaskie Province, Grajewo County, Grajewo Municipality.

This document is a summary in a non-specialist language of information concerning the Project and the environmental and social impact of its implementation. It was prepared on the basis of the obtained administrative decisions and environmental documentation made for the planned Grajewo wind farm.

# 2. PROJECT DESCRIPTION

Grajewo WF will consist of 7 wind turbines located in the area of Popowo, Boczki-Świdrowo, Wierzbowo and Wojewodzin villages. The turbines implemented within Grajewo WF marked as G13, G14, G15, G16, G17, G18, G24 - these are shown in Figure 1. These turbines are part of a larger project consisting of 25 wind turbines, for which the Grajewo Municipality Head on September 28, 2010 issued an environmental permit.


**Figure 1 Wind turbines location presented on orthophotomap layer**

Vestas V110 2.0 turbines (each 2.0MWe) will be used for Grajewo WF. The total capacity of the Grajewo wind farm will be 14MW, each turbine will be of 180 m total height and 110 m rotor diameter. Apart from the above-mentioned turbines, the farm includes internal access roads, underground medium voltage cable connections connecting the turbines with substation (GPZ), maneuvering yards and assembly and storage yards. Grajewo WF will be connected to the power grid via two substations (GPZ) - Grajewo 1 and Grajewo 2. All power lines in the Project will be underground cable lines.

The area in which the Project is located is characterized by a varied terrain. It is an undeveloped area, used primarily for agricultural crops, separated by arable meadows and small complexes of private forests. It is located outside areas belonging to the Natura 2000 network, other forms of nature protection and outside ecological corridors of national importance. Location of the wind farm in relation to protected and sensitive areas is presented in Figure 2.

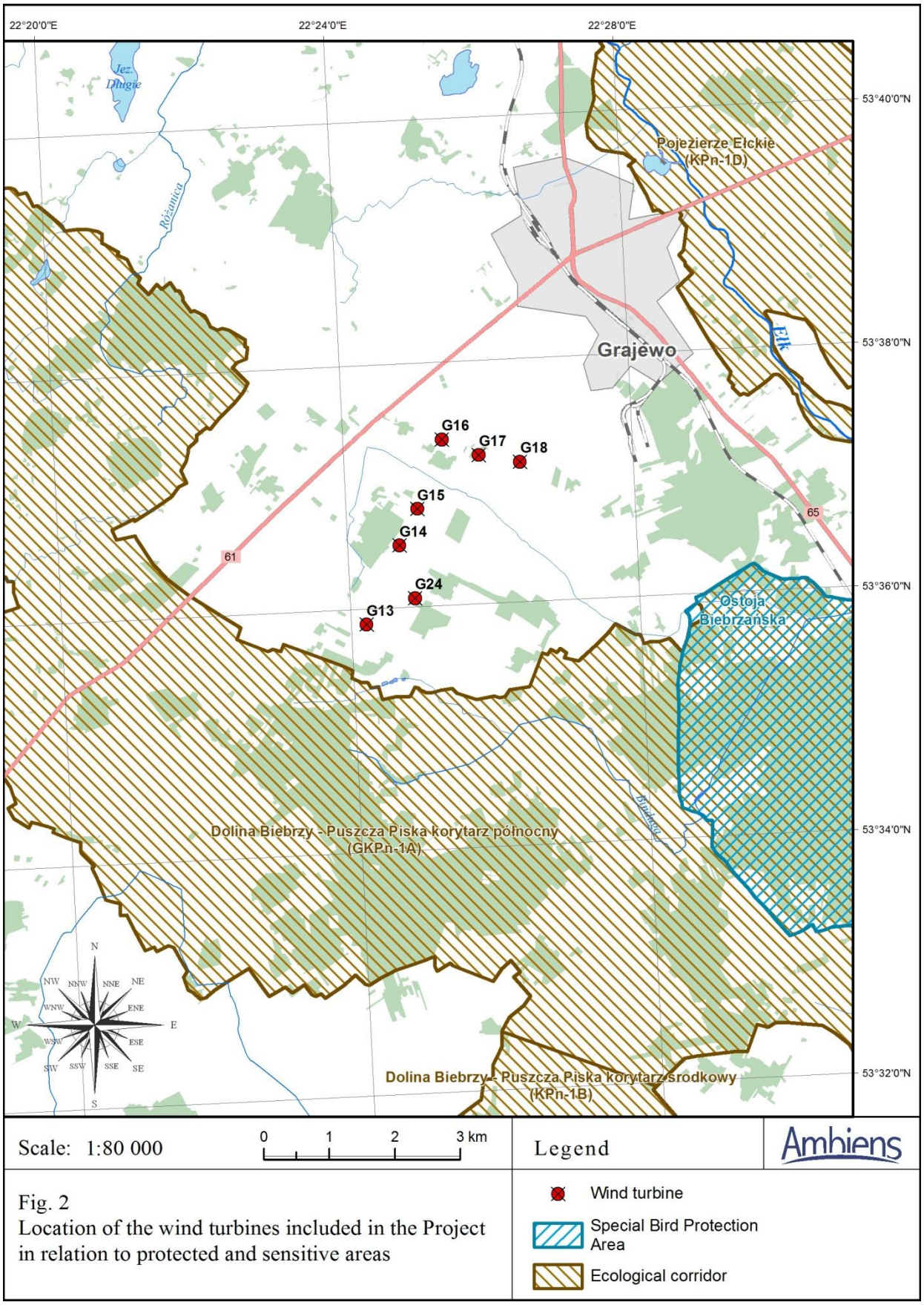


Fig. 2
Location of the wind turbines included in the Project in relation to protected and sensitive areas

**Figure 2 Wind turbines location in relation to protected and sensitive areas**

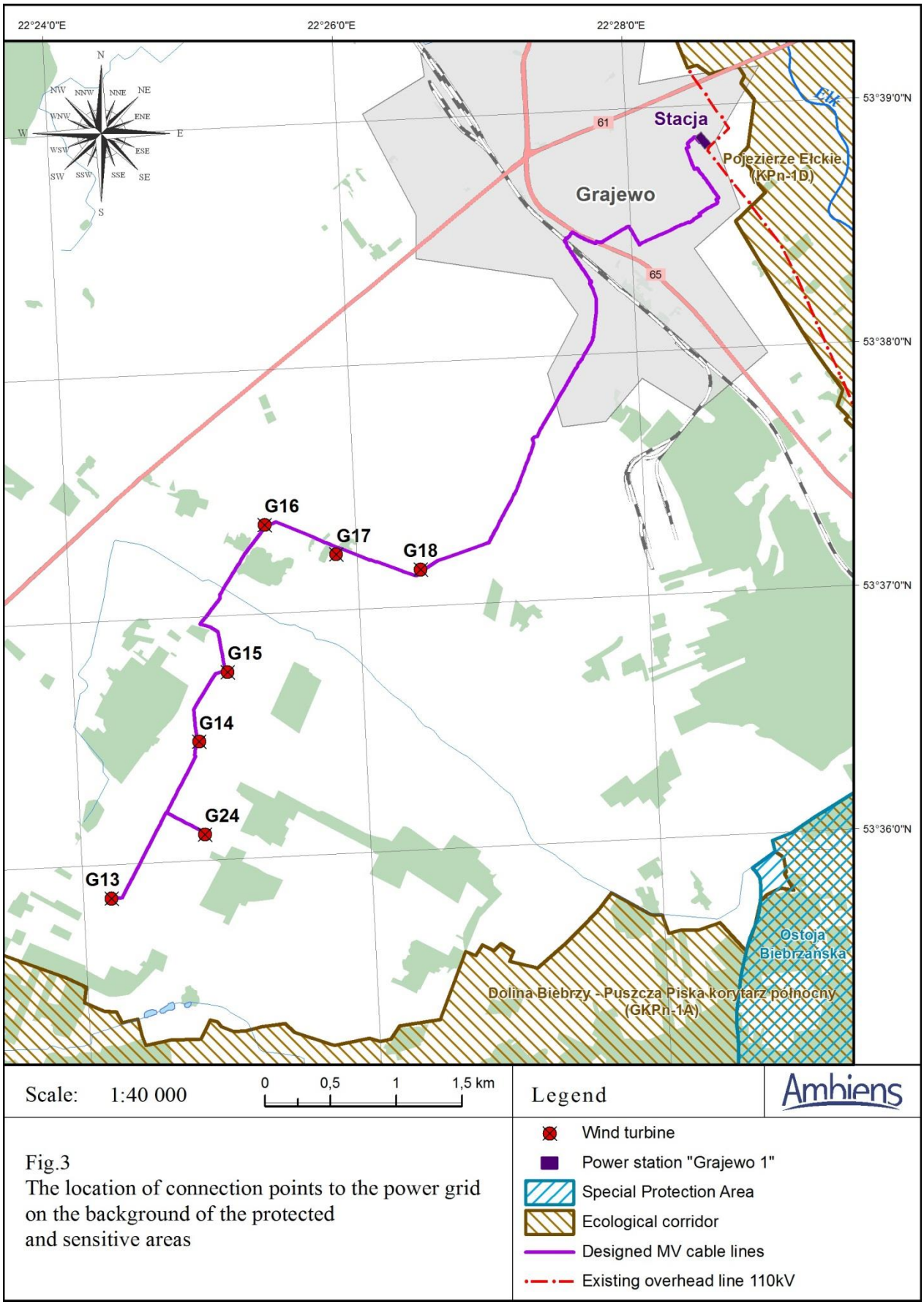


Fig.3
The location of connection points to the power grid on the background of the protected and sensitive areas

**Figure 3 Power grid connection points location in relation to protected and sensitive areas**

There are existing and planned wind farms in the vicinity of the Project. There are plans to build a farm consisting of several wind turbines In Grajewo municipality. Whereas in Rajgród municipality, adjacent to Grajewo municipality, there is a Rajgród wind farm. This farm with a total capacity of 25.3 MW consists of 11 wind turbines. It was put into operation in 2014.

During the period of operation of the Project, the wind kinetic energy will be converted into mechanical energy on the farm and then into electricity, which will be fed into the grid. Each wind turbine included in the Project will consist of a tower and a nacelle containing a rotor and measuring devices. The rotor is composed of blades connected by a hub. The technological process taking place at the wind farm is based on the production of lifting force by the wind on the rotor blades and setting the rotor in rotary motion, thanks to which kinetic energy of the air is converted into mechanical energy. A generator driven by a rotating rotor converts its mechanical energy into low voltage electricity. The energy generated is then transferred to a transformer, which raises its voltage to the value required by the grid.

The expected lifetime of wind turbines is about 25 years. After that time, two solutions are possible concerning the area occupied by the power plant: the old, decommissioned turbine will be replaced by a new, more modern one; the power plant will be decommissioned and the area occupied by it and the accompanying infrastructure will be recultivated.

Given below is a photo of a wind turbine (Photo 1).

**Photo 1 Wind turbine (*Source: Own materials)***

# 3. PROJECT CONDITIONS

## JUSTIFICATION OF THE PROJECT

The aim of the Project is to produce electricity from a renewable source which is the wind. Thus, the implementation of the Grajewo wind farm fits into the assumptions of the national strategy and EU energy and climate policy indicating the need to reduce greenhouse gas emissions, increase the share of energy from renewable sources in total consumption and increase energy efficiency.

In the last reported period (CSO data), in 2018 the share of renewable sources in gross final energy consumption in Poland amounted to 11.28%, and 13.03% in the power industry.

Under Directive 2009/27/EC of the European Parliament and of the Council of 23 April 2009 on the promotion and use of energy from renewable sources amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC, the national target for the share of RES in gross final energy consumption for Poland in 2020 was set at 15%. The targets for 2030 are set by Member States themselves.

In order to meet the above obligation, further development of renewable energy production, including wind energy, is necessary. This is particularly important in the context of the EU strategy for 2012-2030, which indicates that the EU is to achieve a share of renewable energy in gross final energy consumption of 32% in 2030 (in 2018 the previous target for this horizon - 27%, was revised upwards).

This project in its present form and after a possible re-powering process is also part of the EU concept of The European Green Deal, which assumes climate neutrality in 2050.

The draft of the updated Polish Energy Policy (PEP 2040) - a key industry document - assumes an increase in the share of energy from renewable sources in gross final consumption to 15% in 2020 (22.1% in the power industry) - which is the implementation of the EU obligations. Further planned assumptions for Poland are currently 21-23% in 2030 (31.8% in the power industry) and 28.5% in 2040 (39.7% in the power industry).

The draft National Energy and Climate Plan for 2021-2030, the second fundamental document conditioning the objectives and paths of energy transformation in the context of reducing greenhouse gas emissions, was submitted to the European Commission on 30.12.2019. It assumes, similarly to PEP 2040, a 21%-23% share of RES in gross final energy consumption in 2030.

The, above mentioned, national strategic acts, drafted strategic documents and the EU regulations clearly justify the Grajewo Wind Farm Project.

According to estimates, the expected annual energy production of the Project will depend on the probability value: P50=56.5 GWh/a, P75=52.9 GWh/a, P90=49.6 GWh/a. Therefore, the Project is environmentally/climate friendly, as it will avoid CO2 emissions of at least P50=38,533 tons per year, P75=36,078 tons per year, P90=33,827 tons per year (a rough estimate calculated for the average emission factor of the Polish energy sector per unit of the energy produced in 2018 - 0.682 tCO2/MWh).

In addition to the above-mentioned indirect reduction of greenhouse gas emissions, the Project may also have a positive impact on the reduction of pollutant emissions to air. The increase in generation capacity in renewable energy sources will reduce the need to use conventional power plants based on

the combustion of fossil fuels, whose by-products are SO2, NOx, heavy metals and PM10 and PM2.5 dust.

## LEGAL CONTEXT AND PUBLIC CONSULTATIONS

The project of Grajewo wind farm construction requires an EIA under Polish law and is defined as a project which may potentially significantly affect the environment, for which an environmental permit is required. Due to this fact the Company, following Polish law, obtained an environmental permit in 2010.
Society participation in the environmental impact procedure of the Grajewo wind farm investment was ensured basing on the Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments. EP indicates that current information about the proceedings to issue the environmental permit was placed on a notification board in the Grajewo Municipality Office, on the BIP website of the Grajewo Municipality Office, on notification boards in the Boczki - Świdrowo, Wojewodzin, Kurejwa, Wierzbowo, Popowo villages. According to the information provided by the leading authority, the decision indicated that no comments and objections to the Project were received during the proceedings.
Public consultations of the Project also took place as a part of adopting the local spatial development plan for the area where it was planned. Both, consultations and the process of passing the LSDP were conducted by the Head of Grajewo Municipality.
The EIA is required prior to issuance of building permit decision. The project consisting in the construction of 7 Grajewo WF has 5 decisions approving a substitute building permit and granting a building permit for the wind turbines issued by the Starost of Grajewo.

## WHAT IS THE CURRENT STATE OF THE ENVIRONMENT ON THE INVESTMENT SITE?

GEO Renewables is developing the Project acting on behalf of CONTINO OMIKRON Sp. z o.o., commissioned an indent consultant, Ambiens, to undertake additional due diligence and studies and update the documentation.

Ambiens confirmed that the Project conditions have not changed and the orginal EIA is valid. This was confirmed through decision with local authorities and legal review. Ambiens undertook additional review of the Project.

The Grajewo WF, as mentioned in the introduction, is a part of a larger project consisting of 25 wind turbines, for which the Grajewo Municipality Head issued an environmental permit on September 28, 2010 (decision mark R-RG 7624-19/10). As part of the EIA procedure, which included the preparation of the EIA, annual surveys of birds were carried out in the area intended for the location of all 25 turbines in the period from November 2008 to November 2009. In accordance with the provisions of the EIA report, a total of 26 field inspections were carried out in the area of the planned farm and in its immediate vicinity (in a 3 km buffer) in all periods of bird activity. In addition, in order to detect larger bird clusters, the surrounding area was inspected within a 10 km radius around the investment. It was found that the area where the inventory was carried out is poor in terms of the number of bird species, while rare and valuable species occur here sporadically. It was indicated that the area is

unattractive in terms of feeding grounds for birds and is used mainly by species of agricultural areas that have adapted to life in the vicinity of man. In the area of the planned wind farm location, no nesting of large bird species was found, except for the white stork with nests within human settlements.

In addition to the annual bird monitoring, an additional annual monitoring of this group of animals was performed in the period March 2012 - February 2013. According to the information contained in the Report on the above mentioned research, a total of 39 field inspections were carried out on the area of the planned investment and in the 2 km buffer during the spring and autumn migration of birds, as well as during the breeding and winter season. Moreover, the presence of nesting sites of birds under zone protection was checked within the 10 km buffer. The results of the studies presented in the Report indicate that:

- Breeding species are primarily bird species associated with the agricultural landscape. Species associated with local marshland, ponds and wet meadows were found in higher numbers than in other areas of similar character in the country,
- there are 3 breeding sites of birds under zone protection within 10 km from the investigated area, but birds of these species were seen over the surface only several times during the whole observation period,
- the investigated area is not relevant for bird migration. The birds used the airspace with moderate intensity. This intensity increased during the autumn migration. The parameters of airspace utilization by clawed birds did not differ from the results obtained for locations in a similar landscape in Poland,
- the area of the planned farm is not a feeding ground for large flocks of Anseriformes birds, cranes, or a place of regular pre-migration gatherings of large species.

For the purpose of analyses aimed at determining the impact of the Project on bats a monitoring of this group of animals was performed in 2010, 2013 and 2014. It states, that the Company carried out additional action above the current standard and best practices in this area. Monitoring lasted longer than 1 year. The monitoring was carried out in the area designated for the farm and in the buffer of about 2 km. According to the information contained in the Monitoring Report, the obtained results indicated bat activity of three species – Nathusius pipistrelle, Soprano pipistrelle and Nictule and three groups – Myotis sp, Eptesicus sp. and Nyctalus sp. Their activity in the area designated for the investment was assessed in the above-mentioned Report as low or average.

In addition to the above-mentioned monitoring of birds and bats, an inventory of plants and animals was made in the area intended for the construction of wind turbines. The results indicate that it is a poor area in terms of the occurrence of animals, as there are mainly small mammals and a small number of insects. It was pointed out that the vegetation is dominated by that associated with human activity and of low natural value.

## 4. WHAT WILL BE THE IMPACT OF THE WIND FARM ON THE ENVIRONMENT?

The impact of the wind farm on the environment will occur during its construction, operation and decommissioning. This impact will be minimized by means of the available technical and organizational measures and solutions to a level not causing a significant negative environmental impact.

## IMPACT DURING THE CONSTRUCTION OF THE INVESTMENT

Impacts at the construction stage will be primarily related to earthworks and car traffic. Noise and pollutant emissions to the air will occur.
In order to limit the above-mentioned impacts, the following minimizing measures indicated in the environmental permit will be applied:

- the construction period will be limited to the minimum necessary and the works will be carried out during the daytime.
- during construction, the technical condition of vehicles and equipment will be monitored on an ongoing basis. The construction site will be equipped with materials neutralizing possible leaks and spillages,
- waste management will be ensured in accordance with the applicable legal requirements in this respect,
- In order to minimize the loss of cover vegetation, the top soil layer will be removed together with the soil vegetation before the construction works are started, and then the cover vegetation will be restored after the earthworks are completed,
- after completion of the works, the investment site will be cleaned up and agricultural use of the land will be restored. Earth masses from excavated material produced during the construction of the foundations will be used on site in order to avoid their transportation.

## IMPACT DURING THE OPERATION OF THE INVESTMENT

The main impact during the operational stage of the Project will be on the landscape, acoustic climate and on birds and bats.

The Project is located outside the areas covered by the forms of nature protection and at a considerable distance from the afore-mentioned forms. According to the information included in the EIA Report for Grajewo WF there will be no impact on protected areas and on species and habitats protected within the Natura 2000 areas, as well as on the cohesion of these areas.

The area where the Project will be implemented is not covered by the legal form of protection of cultural heritage and monuments and contemporary cultural assets. Therefore, there will be no negative impact on historic buildings and archaeological sites.

At this stage there will be no negative impact on the ground surface. The area of investment plots located outside the place of foundation of the Project elements will be able to be used for agriculture.

According to the information contained in the EIA Report for Grajewo WF there will be no negative impact on the quality and quantity of surface and underground waters.

The operation of the wind farm is not related to the generation of waste. Only the components that wear during the operation of the turbine and oils will constitute waste. This waste will be managed by service companies.

The source of electromagnetic radiation will be a medium-voltage substation and underground medium voltage cables running from individual wind turbines. The emission of electromagnetic radiation from the above-mentioned objects will not exceed the permissible values specified in the applicable regulations.

In accordance with the applicable legal regulations, the Project is not a plant with an increased risk of industrial failure or a plant with a high risk of industrial failure.

At the stage of the preparation of EIA Report for Grajewo WF no other existing or planned wind farms were identified in the vicinity of the investment. Therefore, no cumulative impact analyses were conducted. It should be taken into account that the turbines implemented within the Project, marked as G13, G14, G15, G16, G17, G18, G24, are part of a larger project consisting of 25 wind turbines, for which the Grajewo Municipality Head issued an environmental permit on September 28, 2010. Therefore, the impacts analyzed in the EIA Report concerned all 25 turbines. At present, according to the developer's knowledge, the projects related to the construction of turbines from the, above mentioned, environmental permit are being developed in the Grajewo municipality, i.e. turbines that will not cause excessive cumulative impact with the G13, G14, G15, G16, G17, G18 and G24 turbines. To the developer's knowledge, there are existing and planned wind farms in the vicinity of the Project (in municipalities adjacent to Grajewo municipality). Due to the distances between the, above mentioned, investments and Grajewo WF there will be no cumulative impacts.

Taking into account the nature of the Project, its location (located at a distance of approx. 70 km from the eastern border and approx. 95 km from the northern border of Poland with neighboring countries) and the extent of the impacts, at the stage of the EIA procedure it was not found necessary to conduct a cross-border environmental impact assessment. The Project will not affect the state of the environment in the areas of the countries neighboring Poland and therefore it was not necessary to carry out any proceedings on the cross-border impact for the Project.

NOISE

As stated in the EIA Report for Grajewo WF, the noise impact analysis was performed using a computer program to determine the conditions to be met to ensure that the impact on the acoustic climate does not exceed the applicable environmental quality standards. The results of the analyses indicated that the noise level emitted by turbines with maximum sound power level of 107,0 dB would not exceed the values provided for the acoustically protected areas located in the vicinity of the investment. In the EIA Report, it was assessed that the 45dBA isophone indicating the acceptable noise level during the nighttime does not cover the buildings of the villages closest to the investment, i.e. Wierzbowo, Boczki-Świdrowo, Popowo and Wojewodzin. The figure below (Figure 3) presents a map showing the results of acoustic calculations, on which the authors of the EIA Report have marked the above mentioned 45 dB isophone. The red color of the above map shows 7 turbines, the implementation of which is covered by the Project. The calculations were made for wind turbines with maximum sound power level of 107,0 dB, but all wind turbines in the Project will have maximum sound power level of 106.0 dB (model Vestas V110 2,0 MW). Vestas 110 2,0 MW has lower level of maximum sound power level so impact on the acoustic environment will be lower than presented in EIA Report. It has been stated that, according to prognoses, there will be no places where permissible noise level will be exceeded.

In order to determine the actual impact of the Project on the acoustic climate, the environmental permit imposed an obligation to carry out post-implementation noise monitoring on the Investor.

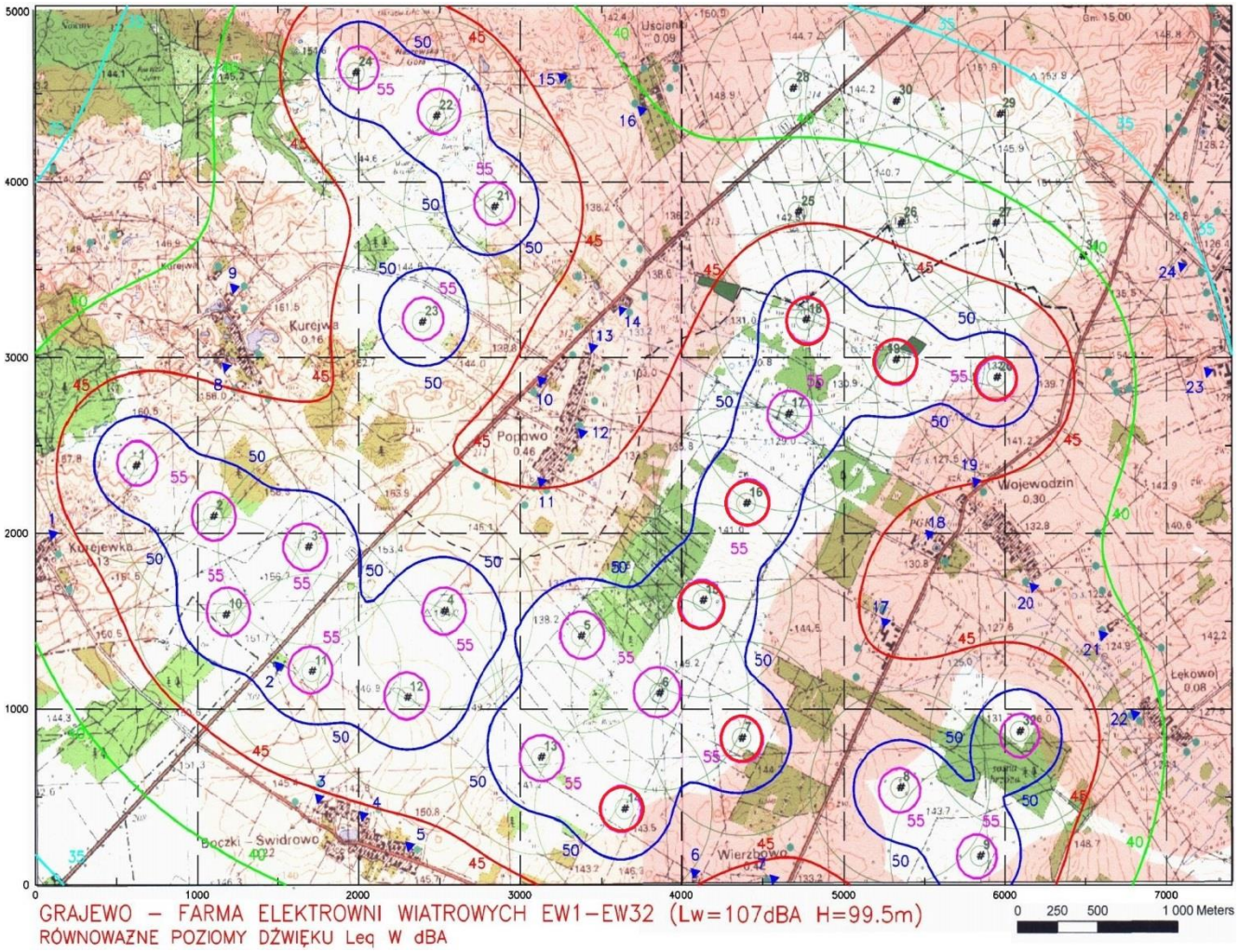


**Figure 3 Map showing the results of acoustic calculations, on which the 45 dB isophone is marked** ***(source: Environmental impact report of the Wind farm consisting of 25 Siemens or Vestas V-112 power plants located in the areas - A, B, C, D located in the area of the villages: Grajewo, Wojewodzin, Popowo in the Grajewo Municipality).***

## LANDSCAPE

The project will be developed in an agricultural area, currently changed by human activity (Photo 2, Photo 3).

**Photo 2 View of the investment area** ***(Source: Own materials, 2019 )***

**Photo 3 View of the investment area** ***(Source: Own materials, 2019 )***

The wind farm will be a new element in the landscape and will introduce height dominants in the form of wind turbines. The assessment of impact on the landscape of such an investment is subjective. In the opinion of a part of the society wind turbines may disturb the harmony in the landscape, causing its disfiguration. On the other hand, there is an opinion that wind turbines are an element which makes the area more attractive, giving it a modern and pro-ecological character. The impact on the landscape will be minimized by applying the following measures indicated in the environmental permit:

- liquidation of temporary access roads prepared before the start of assembly works.
- the use of appropriate painting of the rotor blades to reduce the reflection of sunlight and minimize visual disturbance,
- the use of one type of wind power plants in colors that cause the construction of the plant to "blend in" with the surroundings.
- use of underground transmission lines,
- introducing a ban on placing advertisements on the power plant structure.
- covering the substation with landscape-insulating greenery in a 10 m wide strip.

BIODIVERSITY

There are no areas and objects covered by legal protection under the Act on Nature Conservation and ecological corridors of national importance in the Project implementation area. The area is not located within any of the areas protected under international law, indicated in the Convention on Wetlands of International Importance, especially as a living environment for waterfowl, of February 2, 1971.

The area of the Project is characterized by low biodiversity. The vegetation is dominated by the one of low natural value, related to human activity. It is a poor area in terms of occurrence of animals. On the basis above presented data it is established that the stage of implementation/liquidation and operation will not have any negative impact on biodiversity.

IMPACT ON BIRDS

For the purpose of analyses aimed at determining the impact of the Project on birds an annual monitoring of birds was performed in the period from November 2008 to November 2009. It was found that the area, where the inventory was carried out, is poor in terms of number of bird species. The most common species were passeridae birds, which are popular for agricultural landscape, and skylark was most highly dominating species. It was indicated that the area is unattractive in terms of feeding grounds for birds and is used mainly by species of agricultural areas that have adapted to life in the vicinity of man. In the area of the planned wind farm location, no nesting of large bird species was found, except for the white stork with nests within human settlements. It was indicated that during the inventory, migrations of birds were observed, but there were no intensive passages of migratory birds and the area is not located on communication route of birds that carry out long-distance migrations. The EIA Report includes information that clawed birds may use the Project area as a hunting ground. Moreover, it was indicated that there are no larger water reservoirs in the investigated location, which could potentially be a place of Anseriformes bird concentration.
Apart from the above-mentioned analyses, performed before the environmental permit was obtained, additional annual bird monitoring was performed in the period from March 2012 to February 2013. Its results showed that the breeding species are primarily bird species associated with the agricultural landscape; the investigated area is not important for bird migration, and the area of the planned farm is not a feeding ground for large flocks of Anseriformes, cranes, or a place of regular pre-migratory gatherings of large species.

Based on the results of the monitoring, which was mentioned above, and taking into account the location and characteristics of the Project, it was concluded that it will not have a significantly negative impact on migratory birds due to relatively low land use during passages. The impact of wind power plants on breeding and sedentary birds encountered in winter will not be significant for their population. The birds that nested in places designated for the turbines are likely to occupy the spaces between individual turbines or move to the wind farm outskirts. It has been found that birds that use the air space during the nighttime hours occur in a small number of individuals on the Project site. Species with night activity hunt in open spaces, but most often close to the forest and usually move below the rotor range. Therefore, the location of wind turbines in the Project will not pose a threat to the penetrating night birds.

The Company will undertake actions to minimize potential impact on birds including:

- not constructing during bird breeding season to limit any disturbance to birds,
- post-investment bird monitoring over the first 2-4 years of the farm operation. The observations will be carried out during spring, autumn migration of birds and during the breeding period. Monitoring will be carried out by an independent specialist in ornithology in line with best practice and provide the results to RDEP. General information on the monitoring and it's results will be provided to public information. The independent specialist mentioned above will be appointed by the Company. The monitoring will be aimed at assessing changes in intensity of land use by birds during operation in comparison to preconstruction monitoring results. If the results indicate potential impacts on birds, the Company will decide on further monitoring or action to minimize negative impact,
- transmission lines connecting the generator to external power grid will be located underground.

IMPACT ON BATS

The results of bats monitoring obtained indicated the presence of bat activity of three species – Nathusius pipistrelle, Soprano pipistrelle and Nictule and three groups – Myotis sp, Eptesicus sp. and Nyctalus sp. The species mentioned before are common in this part of Poland. Their activity in the area designated for the investment was assessed as low or middling. The study area is not an attractive feeding ground for these mammals. Neither breeding colonies nor bats wintering grounds were found. Bat migration routes do not run through the investment area.
The impact on bats may take place during the operation stage of Grajewo WF when a situation of bat mortality occurs as a result of collision with the wind turbine rotor or as a result of the rupture of bats' alveoli. The assessment of occurrence and scale of this phenomenon will be possible in the post-implementation period by keeping appropriate documentation in case of finding dead bats. If the results indicate potential impacts on bats, the Company will decide on monitoring or action to minimize negative impact.

### IMPACT DURING LIQUIDATION OF THE INVESTMENT

The nature of effects during the decommissioning stage involving the disassembly of wind turbines and the associated infrastructure will be similar to those that will occur during the construction stage. These effects will be minimized by applying best practices and environmental protection solutions available at the time of decommissioning.

## 5. WHAT WILL BE THE IMPACT OF THE WIND FARM ON SOCIETY?

Wind farms can be associated with environmental and social impacts through location and for instance impacts on local landscape, noise and shadow flicker on local communities as well as land use.

Studies undertaken to date and as confirmed by independent consultant, the impacts are mitigated through careful planning and design and optimizing both on location as well as use of modern turbines. The EIA decision issued for the Project does not introduce an obligation to create a restricted use area, therefore there will be no restrictions in the manner of management of the areas adjacent to the Project.

The Project has been approved by the local community also through the local development plan, which was issued on the 2012. The development plan included a Strategic Environmental Assessment. During the strategic environmental procedure, no comments from local community were submitted. It is indicated in the building permits for turbines that the construction design takes into account the conditions contained in the above-mentioned local development plan.

The project will also have a positive social and economic impact on the development of Grajewo municipality. This is due to an increase in the municipality's tax revenues and an increase in the annual income of the land tenants on which the Project is located. The land was acquired on the basis of commercial transactions with local owners. Communication with landowners started in 2008. Negotiations of lease agreements have been conducted since 2010, signing of lease agreements was carried out in the years 2010-2013, and signing of easement agreements - in the years 2010-2016. Currently, there are held discussions with owners of the land intended for roads and temporary yards.

Under Polish building law, each turbine is associated with a building tax based on the value of structure. This is paid irrespective of operations and amount to circa 85 000 PLN/year per turbine. This will therefore provide additional direct revenue of 1 445 000.00 PLN/year to the local community to be used for local process in additional to corporate taxes employment and land use costs.

The Company will ensure safe working environment for staff and contractors as well as local community. The Company will develop procedures to work under CV-19/pandemic conditions, include safety for on-site and local community in adhere to Polish, EU and WHO guidance. Subcontractors employed by the Company will also ensure mentioned above safe working environment.

# 6. MONITORING OF THE INVESTMENT IMPACT

According to the requirements of the environmental permit, at the stage of operation of the Grajewo WF, the environmental monitoring should be carried out - bird monitoring and noise monitoring. It was pointed out that it is necessary to control the impact of wind power plants on bird mortality - the control should take place during the first 2-4 years of the farm's operation and consist in counting the dead birds found around individual power plants and providing this information to the municipal authorities. As far as noise is concerned, it was ordered to carry out an annual post-implementation noise monitoring in the vicinity of the installation in the areas of existing households. Moreover, the environmental permit imposed an obligation to carry out continuous operation and maintenance support in order to maintain proper wind farm operation.

According to requirements of the environmental permit it is not necessary to carry out a bat monitoring. However the Company decided do take additional action above the current standard in this area and plans to prepare appropriate documentation in case of bat mortality, noting details of such occurance (date, time, location, circumstances of finding a bat) together with photographic documentation allowing to recognize the species by an independent specialist in chiropterology. If the results indicate potential impacts on bats, the Company will decide on monitoring or action to minimize negative impact.

The Company will implement and operates an EHS management system. This will include H&S standards to be applied throughout the process of construction and operation, including traffic management.

In terms of EMS, the Company will retain a consultant to advice through the process of operations and undertake the monitoring process.

# 7. COMPLAINT PROCEDURE

A complaint mechanism will be implemented in GEO Renewables as part of the Project Management System. Current comments, remarks and suggestions regarding the Project will be accepted via the Complaint Form (developed both in Polish and English). This form will be available on the developer's

website, in the section concerning the presentation of the Project and in the Grajewo Municipality Office. Specimen of the form is presented below.

**Table 1 Complaint form**

| **Case number (to be completed by the administrator):** | |
|---|---|
| | |
| **Name and surname** | |
| **Contact information**<br><br>**Please select the method of contact with you** | ☐ By letter<br>……<br>……<br>……<br>☐ By phone<br>……<br><br>☐ E-mail:<br>…… |
| **Preferred correspondence language** | ☐ Polish<br><br>☐ English<br><br>☐ other (please state which)…….. |
| | |
| **Description of the subject matter of the case or complaint**<br><br>**What is the subject matter of the case/complaint,**<br>**when the case happened,**<br>**location of the case,**<br>**people involved in the case,**<br>**what are the consequences of this situation.** | |
| **Date of the event/occurrence of the subject matter the complaint/manifestation of the case** | ☐ One time event (date……)<br><br>☐ The event happened more than once. (How many times...)<br><br>☐ An ongoing event (problem currently being experienced) |
| | |

| | |
|---|---|
| **What actions would provide a solution to the problem?** | |

GEO Renewables will inform the municipality of Grajewo about the mechanism and place of complaint submission. All submitted comments will be analyzed.
The procedure involves assigning a Coordinator, who will be responsible for responding in case of complaints from Project stakeholders. The contact person at GEO Renewables for public communication in the Project will be the Investment Specialist:

**Ms Sylwia Jaruga-Białaś**
tel:+48 728 88 22 38
E-mail address: sylwia.jaruga@georenewables.pl