



JELINAK WIND FARM  
PROJECT,  
CROATIA

**Stakeholder  
Engagement  
Plan**

June 2013

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# 1. Introduction

This document describes and defines the Stakeholder Engagement Plan (SEP) of the “JELINAK WIND FARM PROJECT” (further referred to as “the Project”). Project is developed by company Vjetroelektrana Jelinak Ltd., the Croatian subsidiary of ACCIONA Energia SA – Spanish world leader in the renewable sector.

ACCIONA Energia SA is intending to finance operation of “JELINAK WIND FARM PROJECT”.

The Stakeholder Engagement Plan (SEP) was prepared in compliance with International Financial Corporation (IFC)’s Performance Standards on Environmental & Social Sustainability. These Standards require that if communities may be affected by risks or adverse impacts from projects, the Sponsor will develop a Stakeholder Engagement Plan / Procedure. The main objective of this Plan or Procedure is to ensure that affected communities are given opportunities to express their views on project risks, impacts and mitigation measures, and allow the Sponsor to consider and respond to them on an ongoing basis. The Sponsor should tailor its consultation process to the language preferences of the affected communities, their decision-making process and the needs of any disadvantaged or vulnerable groups. The Sponsor should establish a Grievance Mechanism to receive and facilitate resolution of affected communities concerns and grievances. The Sponsor should provide progress updates on at least an annual basis to affected communities on issues that either involve ongoing risks/impacts to them or have been raised as concerns via the consultation process.

Thus, the Stakeholder Engagement Plan (SEP) of the Project includes the following:

- Local legal framework of consultation activities and Project disclosure requirements, particularly in respect of those public consultation activities that are directly required under the local permitting process,
- Identification of potential stakeholders in the Project area of influence,
- Record of previous consultation activities
- Description of how any concerns or grievances will be handled (Grievance Mechanism),
- Action plan for further consultation during operation phase of the Project.
- Disclosure plan, including the identification of any locations where relevant Project documentation and information folders will be available locally and elsewhere as well as languages to be used.

JELINAK WIND FARM PROJECT was built in the area of municipality Marina and municipality Seget, Split-Dalmatia County. The wind farm consists of 20 wind turbines AW 82 model, 1.5 MW each. The tower of wind turbines is 80 m high. The investment also covers the following accompanying infrastructure:

- underground installation of middle – voltage electric power cables connecting the turbines with transformer station,
- construction of transformer station installation of power cable connecting transformer station and the overhead power line 110kV,
- construction of optical waveguide telecommunication network,
- construction of internal service – roads of the total length around 7000 m.

## 2. Regulatory Requirements Summary

The current Croatian legislation related to the Environmental Impact Assessment (EIA) process concerning windfarms with a capacity greater than 20 MW are the following:

- Law on spatial planning and construction (Editorial revised text, "Official Gazette", No. 76/07, 38/09, 55/11, 90/11 and 50/12).
- Environmental protection act (Official Gazette no. 110/07)
- Nature Protection act (Official Gazette 70/05)
- Ordinance on designating wild species protected and strictly protected (Official Gazette no. 99/09)
- Regulation on the National Ecological Network (Official Gazette no. 107/09)
- Spatial plan of Split-Dalmatia county
- Noise protection act (Official Gazette no. 30/09)
- Regulations on the use of renewable energy sources and cogeneration (Official Gazette no. 67/07 and 88/12)
- Regulations on the assessment of acceptability for plans, programs and projects for the ecological network (NN 118/2009)
- Regulation on the assessment of the environmental impact - editorially revised text, OG. 64/2008 and 67/2009
- Act on ownership and other property rights (Official Gazette no. 91/96, 68/98, 137/99, 22/00, 73/00, 129/00, 114/01, 79/06, 141/06, 146 / 08, 38/09, 153/09 and 143/12)
- The Land Registration Act (Official Gazette no. 91/96, 68/98, 137/99, 114/01, 100/04, 107/07, 152/08, 126/10, 55/13)
- Law on State Survey and Real Estate Cadastre (Official Gazette no. 16/07, 124/10, 56/10)
- Expropriation Act (Official Gazette no. 9/94, 35/94, 112/00, 114/01, 79/06, 45/11, 34/12)

## 3. Summary of previous stakeholders engagement activities

### 3.1 Public insights and communication with the public authorities, municipalities and population

State Institute for Nature Protection, Excerpt from the database of the national ecological network for Jelinak WF, which sets guidelines for the protection measures for the ecological network and preserving habitat, Ref: 434/09-24, from 30th of January 2009. –NATURA 2000.

The decision on the appointment of members and the secretary of the Commission for Environmental Impact Assessment for the Jelinak WF project UP/I-351-03/07-02/63, Ref :531-08-

3-AM-07-4 from 28th of May 2007.

Invitation to the first Session of the Commission for Environmental Impact Assessment for the Jelinak WF project , from 4th of June 2007.

Session of the Commission for Environmental Impact Assessment for the Jelinak WF from 13th of June 2007., Seget Donji.

Replies to the comments of the Commission from first session, 07th of December 2007.

Organizing public hearings and public review in the municipality Seget, Class :351-01 / 08-01/99, Ref: 2181/1-19-08-02 from 24th of April 2008, Seget Donji.

Questions and comments according to the Minutes of the public hearings and comments entered in the book of comments in the municipality Seget and municipality Marina, the Ministry of Environmental Protection, Spatial Planning and Construction from 4th of July 2008.

Responses to comments from the public insight and the objections of the Commission of the 2nd session, the Ministry of Environmental Protection, Spatial Planning and Construction, Zagreb, 24th November 2008.

Invitation on public insight of the Environmental Impact Study (by: OIKON from Zagreb) for Jelinak WF, which has been held for a period of 21 days from 30.04.2008. until 21.05.2008. in the premises of the municipality Marina and the municipality Seget.

Public hearing held on 8th of May 2008. in the municipality of Marina

Minutes of the public hearing of Jelinak WF Environmental Impact Study ,municipality Marina , Class :351-01 / 08-01/99, Ref: 2181/1-09-08-5 from 08th of May 2008.

Public hearing held on 20th of May 2008. in the municipality Seget

Minutes of the public hearing of the Jelinak WF Environmental Impact Study, municipality Seget, Class :351-01 / 08-01/99, Ref: 2181/1-09-08-6 of 20th of May 2008.

Conclusion on the acceptability of the impact on the environment, the Commission for Environmental Impact Assessment for the project "Jelinak Wind Farm"

Decision on Environmental Impact Assessment, Ministry of Environment Protection, Spatial Planning and Construction, Class: UP/I-351-03/07-02/63, Ref :531-08-1-07-09-15 from 09th of January 2009.

## 3.2 Local permit

In the process of obtaining Location permit for construction of Jelinak Wind Farm, after investor-Vjetroelektrana Jelinak Ltd. submit request for issuance of Location permit, the Ministry of Construction and Spatial Planning shall, in accordance with Article 109 and Article 111 Act on Spatial Planning and Construction (Editorial revised text, "Official Gazette", No. 76/07, 38/09, 55/11, 90/11 and 50/12), not later than fifteen days after receipt of a complete application for issuance of Location permit, call the authorities and / or persons designated by special regulations to insight the preliminary design in order to obtain special conditions.

On the day of insight into the preliminary design, the applicant and designer must attend in order to provide explanations.

Consequently, in the case of Jelinak Wind Farm construction are submitted:

- Call for public insight in the process of issuing Location permit for the construction of Jelinak WF (insight into the preliminary design) from 07th of April 2009.
- Invitation to public insight to all owners and holders of other property rights in the cadastral municipalities Marina, Bristivica and Seget (Jelinak WF) for insight into the preliminary design for the issuance of Location permit, from 20th of March 2009.

After public insight and collected special conditions of the competent state bodies and institutions, to build Jelinak WF was released:

- Location permit for the construction of Jelinak Wind Farm, Ministry of Environmental Protection, Spatial Planning and Construction, CLASS: UP/I-350-05/09-01/3, Reg :531-06-09-19 from 21st of July 2009.

### 3.3 Building Permit

For the purpose of obtaining a Building permit, the investor in accordance with Article 231 Paragraph 1 invites Ministry of Construction and Spatial Planning within thirty days of a receipt of a complete application for a construction permit under Article 228 of this Act, persons and / or body entities designated by special regulations, which were involved in issuing location permit for that construction in order to obtain certification for issuing Building permit on the design conformity with relevant regulations. On the day of insight into the main project, the applicant and designer must attend in order to provide explanations.

Ministry invites for obtaining certificates and other government bodies and legal entities with public authorities, particularly if the construction has impact on the nation's defense and security of the state border.

Jelinak Wind Farm is built based on the below mentioned Building permit and its amendments:

- Building permit, the Ministry of Construction and Spatial Planning, Class: UP/I-361-03/10-01/42, Ref :531-18-1-1-1467-10-22 from 03rd of September 2010
- Minutes from the insight into the main project, Class: UP/I-361-03/10-01/42, Ref :531-18-1-1-1467-10-11 from 28th of June 2010
- First amendment to a Building permit, Class: UP/I-361-03/11-01/167, Ref: 531-18-1-1-1467-11-14 from 24th of November 2011
- Minutes from the insight to the main project (1st Amendment of Building permit), Class: UP/I-361-03/11-01/167, Ref :531-18-1-1-1467-11-9 from 3rd of November 2011
- Second amendment to the Building permit, Class: UP/I-361-03/11-01/225, Ref: 531-18-1-1-1467-12-2 of 10th of January 2012
- Third amendment of the Building permit, Class: UP/I-361-03/13-01/42, Ref: 531-04-1-2-1-1467-13-12 from 11th of April 2013.
- Minutes from insight to the main project (3rd amendment of building permit), Class: UP/I-361-03/13-01/42, Ref :531-04-1-2-1-1467-13-9 from 04th of April 2013

### 3.4 Environmental Monitoring during Operation of Jelinak wind Farm

According to the EIS Decision issued on January 9, 2009 and the IFC requirements agreed in the E&S Action Plan (ESAP), the monitoring during the Operation Phase will be focused on the following items:

#### a) Monitoring on fauna

- Monitoring the impact of windfarm on birds populations over at least two years.
  - Monitoring of the local population of nesting birds.
  - Monitoring of the population of passage and wintering birds.
  - Fatality monitoring results.
- Monitoring the impact of windfarm on bats populations for at least the first three years of operation.
  - Monitoring of disturbance / loss of shelter and habitat of bats.
  - Identification of bat mortality.

- Monitoring the migration of bats.

Final reports will be submitted both to Nature Protection Directorate of the Ministry of Culture and IFC on an annual basis.

b) Noise monitoring

According to the EIS Decision, a continuous noise levels measure at the villages of Muštre and Čudine will be undertaken during the first year of operation.

Given all the above, the investor- Vjetroelektrana Jelinak Ltd. has fulfilled all legally prescribed actions, obtained all the necessary documentation required for the final realization of wind farm Jelinak.

In the process of obtaining the necessary documentation cooperation and coordination with all law designated bodies was carried out, namely:

- Relevant government bodies (ministries, bureaus, agencies, etc.) in the process of obtaining construction documentation required to build wind farms
- Local governments / municipalities where the wind farm Jelinak is constructed as follows:
  - Municipality Marina
  - Municipality Seget

In accordance with whose conditions Jelinak Wind Farm was built, on whose territory public hearing and public insights of the Environmental Study were held, which gave opportunity to all citizens of Municipality Marina and Municipality Seget to present their opinions, comments and questions to the investor and to the Commission for the implementation of Environmental Impact Study.

On all of these questions and objections, it was timely responded, and found that scope of Jelinak Windfarm complied with all the conditions determined by law.

Based on these public insights and public hearings to local governments / municipalities was given the opportunity to participate in procurement of documents on multiple levels, local (county) and state levels (ministries, institutes ....).

- The citizens of the Municipality Marina and Municipality Seget

Pursuant to the Environmental Protection Act (Official Gazette no. 110/07) and the Law on Spatial Planning and Construction (Editorial revised text, "Official Gazette", No. 76/07, 38/09, 55/11, 90/11 and 50 / 12) it is scheduled to hold public hearings in the process of obtaining resolution on the impact of the environmental impact study for the construction of wind farms, obtaining location and building permits.

Given the above legal provisions, by submitting the request for issuance of certain documents under items (Environmental Impact Study, Location Permit and Building Permit), of this report, it is necessary to organize public insights and discussions, and via which it is allowed to legal entities and / or individuals who have properties / real estate bordering the scope of Jelinak Wind Farm.

The above shows that the citizens, associations and other bodies were already allowed to participate in the process of obtaining documentation, and were then able to make observations on construction of Jelinak Wind Farm and can not now invoke certain rights if they have already been able to undertake certain actions.

Regardless, citizens, associations and other entities are also allowed to submit comments on the operation of Jelinak Wind Farm (noise, birds and bats), but considering that the investor, Vjetroelektrana Jelinak Ltd., will constantly conduct noise measurements and monitoring of birds and bats, and by what can be timely respond to eventually filed objections.

## 4. Identification of Stakeholders and Communication Methods

### 4.1 Stakeholder identification

There are several groups of people and social groups who are interested in the Project on different levels. These may be described as following:

- people and social groups who will be directly or indirectly influenced by the Project,
- people and social groups who participate in implementation of the Project,
- people and social groups who have a possibility to influence and make decisions on implementation of the Project.

In accordance to above classification the following stakeholder were identified:

**Table 1 Stakeholders identification**

Directly or indirectly influenced by the Project	Participate in implementation of the Project	Possibility to influence and make decisions on implementation of the Project
Residents of villages / community where wind farm is located (local community) The inhabitants of the wind farm area (neighboring communities) Land owners of turbine sites and energetic power-cable sites NGOs – birdlife associations, local and international Local NGOs Entrepreneurs operating in the area of the investment	Vjetroelektrana Jelinak Ltd. ACCIONA Energy Company Workers stakeholders: employees of Jelinak Wind Farm; ACCIONA Energy (Croatia) Contractors Equipments suppliers Transport companies Security companies Energy recipients (energy networks)	Ministry of Environmental Protection, Spatial Planning and Construction State institute of nature protection Split-Dalmatia County Municipality Marina Municipality Seget State Institute for nature protection The Ministry of culture, Department of Conservation Croatian forests Ltd. Croatian waters Ltd. Civil aviation agency Ministry of internal affairs Ministry of defense

From the above mentioned persons and / or legal entities special impact on Jelinak Wind Farm can have government bodies which have jurisdiction on the control of environmental monitoring during Jelinak Wind Farm operation:

a) Monitoring the impact of Wind Farms on fauna

- Monitoring of local community of nesting birds
- Monitoring of fly-over and wintering bird populations
- Monitoring of possible harming of bats

b) Continuous measurement of noise levels,



According to the measurements and monitoring of birds and bats, investor, Vjetroelektrana Jelinak Ltd., is obliged to make reports to the competent authorities of the measurements and monitoring.

Also people who are legitimated to express their views on Jelinak Wind Farm project are local government-municipalities and the citizens who live in the surrounding areas, so that in presenting their views and seek to certain authorities are also obliged to argue with legal evidence to substantiate the claims.

State authorities which are monitoring directly or indirectly, work of Jelinak Wind Farm are:

- Ministry of environment protection, Nature Protection Directorate
- State Institute for nature protection

All persons and / or legal entities can state their opinion on the scope of Jelinak Wind Farm ie operation of Jelinak Wind Farm, in writing or verbal in the record, according to the legal provisions of certain bodies, namely:

- Ministry of environment protection, Nature protection department
- State Institute for nature protection
- State Inspectorate
- Ministry of the internal affairs

Also, reviews can be submitted to the lower bodies that will forward the opinions to the body that is authorized to act on the submitted opinions or demands.

## 4.2 Stakeholder characteristics and communication methods

As part of Acciona, leader company in Environmental and Social Sustainability, Vjetroelektrana Jelinak d.o.o. has been developing and implementing a Management System of Jelinak wind farm stakeholders' engagement on the basis of Acciona Corporate Management System Guidelines. The processes involved on stakeholder engagement are detailed on proper procedures, instructions and annexes attached to this document.

As described on the Procedure "P07033 Communication with stakeholder" the organization has been establishing a set of tools to ensure correct communication and engagement of all stakeholders. Those tools comes from one-way communication tools like HSE Newsletters and Alerts to meetings and an Acciona ethic channel in order to receive, manage and facilitate resolution of affected stakeholders concerns and grievances.

Communication with stakeholders influenced by the Project will be done by announcements on information boards and websites of local authority (if allowed), and by information disclosure in local press (see Table 6).

Communication with the organizational stakeholders will be conducted following the existing routines and procedures of ACCIONA Energia.

Disclosure of information to the administrative stakeholders will be based on formal notifications, applications and reporting – as required by law and ongoing investment process.

Internal stakeholders, the employees of Wind Farm and ACCIONA Energia will be informed using the existing communication channels and following the communication rules of existing Integrated Management System.

The disclosure of information to external stakeholders, like NGO's will take place in response to direct queries, complaints or objections, following the existing external communication procedure functioning in ACCIONA Energia existing communication policy and management.

According to the procedure, claims and complaints shall be recorded and reported to Management and managed like any other nonconformity through the Acciona Intranet Nonconformity Application as described in the procedure P07021 "Non-Conformities and Actions: Corrective, preventive and improvement".

The characteristic of the stakeholder groups directly/indirectly influenced by Project and communication methods are presented in Table 2.

The characteristic of the stakeholders participating in Project implementation as well as description of communication is given in Tables no. 3, 4 and 5.

Table 6 shows the local newspapers addresses.

**Table 2 Stakeholders – directly and indirectly influenced by Project**

Stakeholders		Characteristic	Communication
Residents of villages / communities where the wind farm is located)	Ćudine, Muštre and Mediči in municipality Seget  Blizna in municipality Marina	<b>Ćudine, Muštre and Mediči</b> – the agriculture villages in municipality Seget.  Number of residence: Ćudina – 22 persons, Muštre -21 persons, Mediči-0 persons. Blizna-258 persons  <b>Municipality Seget</b> the urban-rural commune is located in south part of Split-dalmatian county, 4,854 thousand inhabitants, area of 77,9 km2.  <b>Municipality Marina</b> the urban-rural commune is located in south part of Split-dalmatian county, 4.594 thousand inhabitants, area of 108,8 km2.	Announcements on information boards and website of local authority (municipality Seget and municipality Marina), information at local village administrators offices, Jelinak WF website, local newspapers  Grievances by mail, e-mail, or telephone—see Contacts at end.
The inhabitants of the wind farm area impact (neighboring communities)	Villages of Muštre, Ćudine and Mediči	Mostly rural people, mostly elderly, who are engaged in agriculture for their personal needs	Announcements on information boards and website of local authority information at local village administrators offices, Jelinak WF website, local newspapers
	Village Blizna	Mostly rural people, mostly elderly, who are engaged in agriculture for their personal needs	Residences located closest to the windfarm will be visited quarterly for the first year of operations to verify that shadow flicker are not a substantial nuisance/concern
Land owners of turbine sites and Land owners of energetic power-cable sites	Private owners Republic of Croatia	For area of wind farm development including energetic infrastructure have been established easement rights with Republic of Croatia and private owners by developer company (Jelinak Wind Farm) from local private land owners and Republic of Croatia. Suitable Easement Agreement (LLA) was executed with land owners. (see point 3.3).	Announcements on information boards and website of local authority (municipality Seget and Marina), information at local village administrators offices, Jelinak WF, local newspapers
Residences along transport route	About 10 persons depend on transport roads course.	The different variants of transportation routes were analysed. The final decision for transportation including formulation and dissemination the transportation plan is prepared by developer company and wind turbines producer and developer have signed a contract for temporary easement with owners.	Announcements on information boards and website of local authority (municipality Seget and Marina), information at local village administrators offices, Jelinak WF website, local newspapers
Entrepreneurs operating in the area of the investment	Around 53 companies is registered in municipality Seget and Marina		Website of local authorities (municipality Seget and Marina ), Jelinak WF website, local newspapers

**Table 3 Stakeholders participating in Project implementation**

Stakeholders	Characteristic	Communication
<b>Vjetroelektrana Jelinak Ltd.</b>	<p>The developer company of <b>Jelinak Wind Farm</b> is the limited company Vjetroelektrana Jelinak Ltd. registered in Zrinsko Frankopanska 64, 21000 Split</p> <p>Vjetroelektrana Jelinak Ltd subsidiary of Spanish company ACCIONA Energia SA.</p> <p>Management and information activities, as well insurance the proper contacts with stakeholder and information dissemination are carried out by Vjetroelektrana Jelinak Ltd according to the corporate ACCIONA Energy communication policy and management systems.</p>	<p>In accordance with the rules and procedures of internal communication of ACCIONA Energia.</p>
<b>ACCIONA Energy Company</b>	<p>ACCIONA Energy<sup>1</sup> is the energy division of ACCIONA company. ACCIONA is one of the foremost Spanish business corporations, leader in the development and management of infrastructure, renewable energy, water and services. ACCIONA Energy focusing on renewable technologies implementation, throughout the wind power value chain, from the design and manufacture of wind turbines to the marketing of power and the sale of emission allowances. The company also offers a wide range of products and services for investors interested in different renewable projects, based on its extensive knowledge and experience in the sector.</p> <p>The windparks installed by ACCIONA Energy are located in fifteen countries on the five continents: Spain, the United States, Canada, Mexico Australia, India, South Korea, Germany, Italy, Portugal, Greece, Hungary, France, Poland and Morocco.</p> <p>On the corporate level ACCIONA Energia implemented integrated management system, certified in: ISO 9001:2008; ISO 14001:2004 and OHSAS 18001:2004.</p> <p>As well company developed the Communication Policy set on the Corporate Social Responsibility (CSR) strategy. Communications strategy includes all the stakeholders, external and internal (employees).</p>	<p><b>External Communications</b> is carried out through different supports:</p> <ul style="list-style-type: none"> <li>• Web Page (www.acciona.es; www.acciona-energia.com)</li> <li>• Annual reports</li> <li>• Corporate bulletin ACCIONA Informa. (on-line and printed versions).</li> <li>• Communication department that manages the communication with the stakeholders.</li> <li>• Press conferences and online conferences.</li> <li>• Regular attention and to the consults and the information demanded.</li> </ul> <p><b>Internal Communication</b> is managed mainly through the corporate intranet, the employees have access to the main information, resources and services. Periodically it is issued a newsletter with the main intranet news.</p>
<b>Internal stakeholders: Employees of Vjetroelektrana Jelinak Ltd and ACCIONA Energia Croatia</b>	<p>Currently the employment status of Vjetroelektrana Jelinak Ltd and ACCIONA Energia Croatia division is 7 persons.</p>	<p>In accordance with principles of internal communication, meetings, grievance procedure for workers (employees and contractors).</p>
<b>Contractors Equipments suppliers Transport companies Security companies</b>	<p>Wind farm suppliers selections developed by <b>Jelinak Wind Farm</b> are based on tendering procedure and best offer practice. Offers are selected by applied criteria in line with corporate management procedures.</p>	<p>In accordance with the rules given in agreement between Vjetroelektrana Jelinak Ltd . and construction company. Including information on environment, health and safety, code of conduct, grievance mechanism.</p>
<b>Energy recipients (energy networks)</b>	<p>Energy network company which has a concession license for electrical energy distribution and operating on energy distribution market in Croatia.</p>	<p>In accordance with the rules given in agreement between Vjetroelektrana Jelinak Ltd .. and energy networks company</p>

<sup>1</sup> Based on <http://www.acciona-energia.com> and <http://www.acciona.com>

**Table 4 Stakeholders, who can influence the project and make decisions**

STAKEHOLDERS	COMMUNICATION	NOTE
<b>Nature Protection Directorate of the Ministry of Culture</b>	Final reports with the outcomes of the monitoring impact of Wind Farms on fauna (birds and bats) will be submitted both to Nature Protection Directorate of the Ministry of Culture and IFC on an annual basis.	The Environmental Authorisation states that a monitoring on birds and bats must be undertaken for at least two years. IFC requires one more year on bats monitoring.
<b>Nature Protection Directorate of the Ministry of Culture</b>	Official letters at the request of interested party with the outcomes of one year of continuous measurement of noise levels. It is also required to install a info colum/board at the substation to display noise levels data.	The Environmental Authorisation states a continuous noise level measurement at Mustre and Cudine.
<b>Split-Dalmatia County</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party in order to comply with the conditions of the Spatial Plan of Split Dalmatian County	During the obtaining documentation for building WF, Vjetroelektrana Jelinak d.o.o. have respected the terms of the spatial plan of Split Dalmatian County
<b>Municipality Marina</b>	Yearly compensation of kn 0.01 / kwh communication and payment	According the law Vjetroelektrana Jelinak d.o.o is required, to the municipality shall pay every year a fee in the amount of 0,01 kuna per kw/h of energy produced
<b>Municipality Seget</b>	Yearly compensation of kn 0.01 / kwh communication and payment	According the law Vjetroelektrana Jelinak d.o.o is required, to the municipality shall pay every year a fee in the amount of 0,01 kuna per kw/h of energy produced
<b>State Institute for nature protection</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party	To the competent institution, Vjetroelektrana Jelinak d.o.o., have respected all the conditions.
<b>The Ministry of culture, Department of Conservation</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party	To the competent institution, Vjetroelektrana Jelinak d.o.o., have respected all the conditions.
<b>Croatian forests Ltd.</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party	To the competent institution, Vjetroelektrana Jelinak d.o.o., have respected all the conditions.
<b>Croatian waters Ltd.</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party	To the competent institution, Vjetroelektrana Jelinak d.o.o., have respected all the conditions.
<b>Civil aviation agency</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party	To the competent institution, Vjetroelektrana Jelinak d.o.o., have respected all the conditions.
<b>Ministry of internal affairs</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party	To the competent institution, Vjetroelektrana Jelinak d.o.o., have respected all the conditions.
<b>Ministry of defense</b>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party <b>OR/AND</b> Official letters at the request of interested party	To the competent institution, Vjetroelektrana Jelinak d.o.o., have respected all the conditions.

Stakeholders		Communication
<b>Gov. Administration</b>	State institute of nature protection Trg Mažuranića 5, 10000 Zagreb Tel: 00385 1 5502 900, Faks: 00385 1 5502 901, E-mail: <a href="mailto:info@dzzp.hr">info@dzzp.hr</a>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party
	Civil aviation agency Ulica grada Vukovara 284, 10000 Zagreb Telefon: +385 1 2369 300, fax: +385 1 2369 301, E-mail: <a href="mailto:ccaa@ccaa.hr">ccaa@ccaa.hr</a>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party
	Croatian waters Ltd Ulica grada Vukovara 220, 10000 Zagreb Tel: 00385 1 6307 333, Faks: 00385 1 6155 910, e-mail: <a href="mailto:voda@voda.hr">voda@voda.hr</a>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party
	Croatian forests Ltd. Ljudevita Farkaša Vukotinovića 2, 10 000 Zagreb tel: 01/4804 111, fax: 01/4804 101, e-mail: <a href="mailto:direkcija@hrsume.hr">direkcija@hrsume.hr</a>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party
	Ministry of Environmental Protection, Spatial Planning and Construction Ulica Republike Austrije 20, 10000 Zagreb Tel: 01/3782-444, Faks: 01/3772-822, E-mail: <a href="mailto:jasmina.serdar@mzopu.hr">jasmina.serdar@mzopu.hr</a>	Official letters at the request of interested party
	The Ministry of culture, Department of Conservation Gradska 41 , 21220 Trogir tel.: 021 884 839, fax.: 021 884 907, e-pošta: <a href="mailto:miroslav.katic@min-kulture.hr">miroslav.katic@min-kulture.hr</a>	Official letters at the request of interested party
	Ministry of internal affairs Ulica grada Vukovara 33, 10000 Zagreb Tel: 00385 1 6122 111, Faks: 00385 1 6122 038, e-mail: <a href="mailto:pitanja@mup.hr">pitanja@mup.hr</a>	Official letters at the request of interested party
Ministry of defense Sarajevska cesta 7, 10 000 Zagreb tel.: +385 (1) 4567 111, fax.: +385 (1) 4613 310, E-mail: <a href="mailto:infor@morh.hr">infor@morh.hr</a>		
<b>Municipalities</b>	Municipality Seget Trg hrvatskih vitezova Špiro Ševo Frzelin 1, 21 218 Seget Donji Telefon: 021/880-037; 880 171, Faks: 021/880 171, E-mail: <a href="mailto:opcina.seget@inet.hr">opcina.seget@inet.hr</a>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party. Inspections, monitoring, reporting, as required during construction and implementation. As required by the authority.
	Municipality Marina, Ante Rudana 47, 21222 Marina Tel: 021/ 889 088, Fax: 021/ 796 541, E-mail: <a href="mailto:opcina-marina@st.t-com.hr">opcina-marina@st.t-com.hr</a>	
<b>Local Self-Governing Administration</b>	Split-Dalmatia County Domovinskog rata 2/IV, 21000 Split Telefon: 021/400-019 , Fax: 021/400-087, e-mail: <a href="mailto:sluzbenik.za.informiranje@dalmacija.hr">sluzbenik.za.informiranje@dalmacija.hr</a>	Consultative meetings - information, exchange of documentation and correspondence relating to projects at the request of interested party. Inspections, monitoring, reporting, as required during construction and implementation. As required by the authority.

**Table 5 NGOs interested in the Project.**

NGO's	Name	Contact details	Communication
Birdlife associations local and international	CROATIAN Society for the Protection of Birds and Nature	Gundulićeva 19a; HR-31000 Osijek tel: 031 202 796; mobitel: 095 909 87 <a href="http://www.ptice.hr">www.ptice.hr</a>	Direct meetings at request, Jelinak WF Energia web site  On-going-process during EIAs and on request.

Addresses of local newspapers are given in the Table below:

**Table 6 Local newspapers addresses to be used for information and communication with local stakeholders.**

Name	Addresses phone, fax, website; email
Slobodna Dalmacija	Split, Hrvatske Mornarice 4, telefon:021 352900 , telefax 021 383102 Web: <a href="http://www.slobodnadalmacija.hr">www.slobodnadalmacija.hr</a>

## 5. Stakeholder Engagement

Stakeholder engagement is an on-going process involving

- (i) the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders,
- (ii) meaningful consultation with potentially affected parties, and
- (iii) a procedure or policy by which people can make comments or complaints.

### 5.1 Information disclosure

"JELINAK WIND FARM PROJECT" is intended to be shown by the Jelinak Wind Farm and ACCIONA Energia as an example of good practice in development of wind power, with the aim to involve stakeholders and to keep good communication practices during the lifetime of the project.

Disclosure of relevant project information helps stakeholders to understand the project environmental and social risks, impacts and opportunities. According to this approach, the target of the information disclosure and communication will be:

- to provide a schedule and information on activities that will be arranged to local communities, together with the mechanisms for gathering the feedback.
- to improve the knowledge of what the wind farm project involves, including all stages of development and expected performance.
- to gain public commitment for planned activities of the company.
- to ensure the best practices in terms of environment protection and health and safety for workers and contractors.
- to make available to the public a grievance procedure, in order to collect the feedback and to undertake corrective actions in cases that may lead to unnecessary risks or a negative opinion about developed wind farms.

To ensure transparency and availability of information regarding wind farm operation phases, the Jelinak Wind Farm on behalf of ACCIONA Energia will develop the following information disclosure tools:

- According to the EIS Decision, a continuous noise levels measure at the villages of Muštre and Čudine will be undertaken during the first year of operation and it shall be installed an info column at the substation to **display noise levels data and carbon avoidance. Such data shall be** posted in Muštre and Čudine public places.
- **Annual meetings:** local municipalities will be met with on an annual basis to discuss project production and any related or third party issues.
- **One page information leaflet** (in Croatian, and English language version) – will be prepared and distributed near the wind farm locations mainly in local authority offices; the leaflet will comprise the most important information about the wind farm project as well as indicate the web site and telephone information lines for communication.
- **Website information** – the company will disclose the projects information on Jelinak Wind Farm website (website for Jelinak project under construction). Information will be available in Croatian and English. E-mail communication is available in Croatian and English; email:info@ehn.hr

**Phone line** –The phone number will be given in website and information leaflet prior to the start of construction. Tel. 021 / 340 660, Fax: 021 /340 661,

The following documentation will be made available to the public on the website and in hard copies, under previous request:

- (1) Project Non-Technical Summary (NTS).
- (2) Stakeholder Engagement Plan (SEP), including Grievance Mechanism.
- (3) Information leaflets.

## 5.2 Further Consultations

Consultations with the interested authorities will be conducted in accordance with the regulations and administrative procedures so that the requirements of IFC standards will be met.

Consultations with the internal interested parties will be conducted in accordance with the current practice and integrated management procedure and will include quarterly meetings with the representative of employees. Information about the project will be hang out on boards on the building site. There is a principle of open communication – active or reactive (depending on the scope and subject) information about important events in the company, issues of interest for the general public and clients.

## 6. Grievance mechanism

The **Jelinak Wind Farm** on behalf of ACCIONA Energia will implement the Grievance Mechanism to ensure that it is responsive to any concerns, complaints particularly from affected stakeholders and communities. Special care will be focused on training of **Jelinak Wind Farm** staff involved in the grievance mechanism management regarding functioning of grievance mechanism, particularly the stakeholder's opinion and communication mechanism.

Grievance process outline and Grievance Form are accordingly given below in Annexes. The following indicative timeframe will be used:

- Written acknowledgement of receipt of the grievance: within 5 days of receiving the grievance
- Proposed resolution: within 4 weeks of receiving the grievance – in case of more difficult issues the required time may be longer due to the need of the corporate approval.

The Grievance Procedure should be seen in connection with other Project activities like information disclosure, consultations and communication (as described in previous chapters) as complementing elements allowing for specific synergy effects. In particular the following activities should be taken into account:

- Information about Project implementation will be published on separate page of Jelinak Wind Farm website (website under construction), including link to obtain the grievance form,
- General information about project, presenting general project issues, project implementation stages, and information about grievance possibility will be published and distributed as the leaflet by **Jelinak Wind Farm**,
- Contact by telephone: Tel. +38524340660 and e-mail: info@ehn.hr
- The information on the avenues to lodge a grievance will be placed on the information boards



and websites of local and governmental authorities, as well as the company's website and will be available from the company offices and local authorities,

- **Jelinak Wind Farm** will establish the **Office Manager**, who will deal with grievances,
- All project information presented in leaflet and website will be published in **Croatian and English versions**.

To assess the effectiveness of the system it is planned that internal audits of grievance mechanism will be undertaken periodically in the organization, twice annually.

Moreover periodic external audits of the grievance management system will be undertaken by independent organizations (auditors) allowing elimination of risks associated with improper functioning of the system.

The planned public grievance form is presented in Annex 1. Such form in Croatian, and English, will be posted on mentioned above website together with the description of the grievance response mechanism and provided to the relevant authorities in the municipal.

## 7. Programme and Responsibilities

The Stakeholders Engagement Plan will be implemented by Jelinak Wind Farm personnel in cooperation with the QSE Department of Acciona Energia and External consulting supplier for specific environmental studies (i.e. the post construction monitoring impact of Wind Farms on fauna or noise measurements).

The implementation will be coordinated by **Jelinak Wind Farm Manager**.

**Jelinak Wind Farm Manager** will be responsible for supervision of office manager work and cooperation in solving of problems as well as internal auditing of Grievance Mechanism. **Jelinak Wind Farm Manager** will be generally responsible for delivery of information about all technical and organisational issues as well as meetings and consultations with interested parties.

The organisation plan summarising the actions described in previous sections is presented in the Table below.

No	Action	Schedule
1	Setting-up the Grievance mechanism in the form of procedure Preparation of the communication forms (Annex 1) to be made available in paper form in the office and in the electronic form at the web pages.	Website will be ready as soon as possible.
2	Registration of Communications / Grievance (phone, letters, e-mails and other forms of communication).	On continuous basis.
3	Open a Nonconformity as described in the Procedure P07021	Within 5 days of receiving the grievance.
4	Preparation of the written acknowledgement of receipt of the grievance.	Within 5 days of receiving the grievance.
5	Coordination of the preparation of proposed resolutions.	Within 4 weeks of receiving the grievance – in case of more difficult issues the required time may be longer due to the need of the corporate approval) will be acknowledged within 5 days.
6	Distribution of the answers to the interested parties.	As soon as possible when the answer is ready.
7	Internal review of grievance mechanism (non-conformities open, closed, pending..)	Once per six months by Project Manager
8	External independent review of grievance mechanism	Once per year.
9	Reporting to the PM and Project sponsors. The reporting will include the summary of undertaken activities including communication and grievance statistics.	Once per month.
10	Reporting to the public on project advancement, performance of environment, health and safety, social initiatives.	Once per year.

## 8. Company Contact Information

Main contact for the Project is as follows:

1. Nikola Kurtović  
Wind Farm Manager  
Zrinsko-Frankopanska 64, 21000 Split  
Tel. 021 / 340 660, Fax: 021 /340 661, [info@ehn.hr](mailto:info@ehn.hr)

2. Mirko Tunjić  
Managing Director  
Zrinsko-Frankopanska 64, 21000 Split  
Tel. 021 / 340 660, Fax: 021 /340 661, [info@ehn.hr](mailto:info@ehn.hr)

**Annex 1: Grievance Form**

<b>Reference No:</b>	
<b>Full Name</b> <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	<b>My first name</b> _____  <b>My last name</b> _____  <b>I wish to raise my grievance anonymously</b>  <b>I request not to disclose my identity without my consent</b>
	<b>Contact Information</b>  <b>Please mark how you wish to be contacted (mail, telephone, e-mail).</b>
<b>Preferred Language for communication</b>	<b>Croatian</b> <b>English</b> <b>other ( please specify)</b>
<b>Description of Incident or Grievance:</b> What happened? Where did it happen? Who did it happen to? What is the result of the problem?  _____     	
<b>Date of Incident/Grievance</b>	<b>One time incident/grievance (date _____ )</b> <b>Happened more than once (how many times? _____ )</b> <b>On-going (currently experiencing problem)</b>
<b>What would you like to see happen to resolve the problem?</b>  _____     	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Please return this form to:** [name], Office Manager, [company name],

Address \_\_\_\_\_: Tel.: \_\_\_\_\_ or E-mail: \_\_\_\_\_