

44MW Wind Project in Greece

Rachoula I, Rachoula II, Rachoula III Wind Farms - Greece

ENVIRONMENTAL AND SOCIAL ACTION PLAN



Item No.	Task / Measure / Corrective Action	Purpose of Action	Responsibility	Completion Indicator	Timescale
1.	PR1: Assessment and Management of Environmental and Social Impacts and Issues				
1.1	Ensure compliance to environmental and social standards of the project across all the activities of the Parent Company (TERNA S.A.) in the area to avoid cumulative impacts	Ensuring implementation of the environmental and social management measures and the existing environmental terms.	Project Company and Parent Company	ESMP Reports of the Wind Farms of TERNA S.A. in Dervenochoria	At the end of each year
1.2	Monitor compliance of contractors and subcontractors with the company's policies and the ESMP	Ensuring implementation of the environmental and social management measures and the current environmental terms.	Project Company	<ul style="list-style-type: none"> Evaluation reports for all contractors and subcontractors Contracts with clauses about implementation of ESMP 	Submitted for each new contractor
1.3	Periodically update ESMP with any additional mitigation based on ongoing monitoring activities.	Ensuring implementation of the environmental and social management measures.	Project Company	Updated versions of the current ESMP	As needed
1.4	Updating of the investors on the status of each ESAP element and the status of Environmental Health and Safety issues.	Ensuring implementation of EIA and permit conditions	Project Company	Yearly reports	At the end of each year

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1.5	Appoint an official Community Liaison Officer (CLO) with the relevant skills and qualifications.	The CLO will connect with the local community and authorities regularly, analyse these interactions, and will update and the Project management giving recommendations.	Project Company	Appointment of CLO	Immediately
1.6	Include clauses within contracts with external collaborators to ensure compliance with national and EU requirements.	Unified contracts embracing international environmental, health safety and social standards	Project Company	All contracts are updated to comply with EU requirements.	For all contractors
1.7	Regular inspections of contractors' occupational health and safety (OHS) performance. Inspection results should be included in the yearly reports to the investors.	Ensure implementation of the OHS	Project Company and OHS specialist	Inspection reports	At least once a year (more if there is an issue/accident)
2.	PR2: Labour and Working Conditions				
2.1	Develop a corporate Human Resources Policy to include national	Ensure proper management of human	Project	Submission of the Human	Within next

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	and international regulations, followed by all employees and contractors, including a formal grievance mechanism.	resources and respecting human rights and relevant regulations.	Company	Resources Policy	year.
2.2	Audits at the supply chain for low labour cost supply items	Respecting human and labour rights	Project Company	Completed audit reports	For all suppliers of the project.
3.	PR3: Resource Efficiency and Pollution Prevention and Control				
3.1	Ensuring proper separation, management and disposal or recycling of waste from the project site	To prevent pollution from hazardous waste	Project Company	<ul style="list-style-type: none"> Submission of yearly waste reports Contracts with relevant waste management companies for each waste category 	Every year
4.	PR4: Health and Safety				
4.1	Updating of the OHS and the Emergency Preparedness and Response plans in case of new needs and risks identified	Ensure that the company personnel is informed and prepared for every possible risk	Project Company	Submission of updated Emergency Preparedness and Response plans	As needed

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4.2	Regular personnel training to for emergency and critical situations	Ensure the implementation of the Emergency Preparedness and Response plans	Project Company	Submission of training log sheets	Every year
4.3	Implement a corporate Code of Conduct for all employees and contractors with rules for interaction with locals	Prevent conflicts with local community	Project Company	<ul style="list-style-type: none"> Submission of the Code of Conduct Reporting of any incident with the locals 	Immediately
4.4	Investigation for all security personnel (or contractor) to ensure they have appropriate licensing, experience and training.	Prevent conflicts with local community	Project Company	<ul style="list-style-type: none"> Submission of the investigation report Reporting of any incident with the locals 	Immediately
6.	PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Additional baseline biodiversity assessment should be undertaken for the Dervenochoria area, with specific focus on the bird and bat species. The assessment must include:	To minimize any impacts of the project on bird and bat species	Project Company	Baseline biodiversity report	Within next year.

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	<ul style="list-style-type: none"> - Monitoring visits during the migratory periods (March/April and August to October) in the project area and assessment of collision risk - Survey of nesting birds of the region - Monitoring of bats in the area, especially during breeding period through bat roost identification, acoustic monitoring, bat radar equipment and bat mortality monitoring. - Development of a monitoring plan for potential impacts on the biodiversity of the area, focusing on the avi-fauna and bats, as well as proposal of mitigation measures. 				
10.	PR10: Information Disclosure and Stakeholder Engagement				
10.1	Development of a Stakeholder Engagement Plan (SEP) to complement, enhance and	For maintaining stakeholder engagement at a good level and	Project Company	Submission of SEP	Immediately

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	formalise the ongoing stakeholder engagement activities and reporting of any issues. The plan should include information disclosure and public consultations strategy.	sharing information with the public			
10.2	Setting up a formal Grievance Mechanism for employees and contractors as well as external stakeholders from the local community.	To facilitate logging of complaints and maintain a relevant file	Project Company	Submission of formal Grievance Mechanism procedure	Immediately
10.3	Development of a disclosure package which will include at least the ESAP, the NTS, the SEP and the Grievance Mechanism. The package must be available online at the company's website.	To increase transparency in the project activities	Project Company	Update of company website with the disclosure package	Immediately