Sotis Advisors

Livelihood Restoration Plan

Bałtyk 2 and Bałtyk 3 Offshore Wind Projects (Poland)

Offshore components

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Abbreviations and definitions:

Affected area	Area impacted by Projects, determined by a buffer of 500 m from the outline of the wind farms and on both sides of the common cable
AIS	Automatic Identification System
Projects areas	Affected area includes 5 Projects areas: Bałtyk 2 wind farm, Bałtyk 2 cable corridor, Bałtyk 3 wind farm, Bałtyk 3 cable corridor, Bałtyk 2 & Bałtyk 3 common connection infrastructure (common export cable).
CGM	Community Grievance Management
CMR	Fisheries Monitoring Centre / pl. Centrum Monitorowania Rybołówstwa
Commercial fishing	Conducting activities in the field of sea fishing in order to generate income

ECI	External Connection Infrastructure
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
GDPR	General Data Protection Regulation / pol. Rozporządzenie o Ochronie Danych Osobowych - RODO
GIS	Geographic Information System
GIW	Chief Veterinary Inspectorate / pl. Główny Inspektorat Weterynarii
GUS	Central Statistical Office / pl. Główny Urząd Statystyczny
IFC	International Finance Corporation
JV	Ownership structure of the investor: Joint Venture (JV) - Equinor (50%) and Polenergia (50%)
IMO	International Maritime Organisation
KPI	Key Performance Indicators
LRF	Livelihood Restoration Framework
LRP	Livelihood Restoration Plan
MFW	Offshore Wind Farm / pl. Morska Farma Wiatrowa
MIR	National Marine Fisheries Research Institute / pl. Morski Instytut Rybacki Państwowy Instytut Badawczy
MW	Megawatt
PAP	Project Affected Person
PMA	Polish Maritime Areas
Potentially affected fishing vessels	Fishing vessels operating (fishing) in the affected area in the period 2018-2024 and registered as of 29.04.2025, based on CMR data
Ports of origin	Ports of registration of the potentially affected fishing vessels
Projects	Offshore Wind Farms Bałtyk 2 and Bałtyk 3
PWEA	Polish Wind Energy Association
RCL	Government Legislative Centre
Recreational fishing	non-commercial fishing of marine fish for recreational purposes (angling) in order to generate income
SFP	Special Fishing Permits
TCM	Transitional Compensation Mechanism
TSS	Traffic Separation Scheme
VMS	Vessel Monitoring System

1 Introduction

1.1 Scope and Objectives of the LRP

The Bałtyk 2 and Bałtyk 3 offshore wind farms ("the Projects") are located off the coast of Pomerania in the Polish Exclusive Economic Zone (EEZ) of the Baltic Sea. The wind farms include an offshore component, with wind turbines generating energy and transmission cables to the landfall, and an onshore component, connecting the offshore power generation facility to the Polish grid.

Both potentially entail impacts to assets and livelihoods. The Bałtyk 2 and Bałtyk 3 projects will be financed by multilateral development finance institutions, they are therefore bound to comply with both Polish legislation and the requirements of these lenders. Approximately 30 Polish and international financial institutions, including Polish Development Bank - Bank Gospodarstwa Krajowego (BGK), the EU's European Investment Bank (EIB) and the Nordic Investment Bank (NIB), will provide funding to the Bałtyk 2 and Bałtyk 3 offshore wind farms. Project finance packages over EUR 3 billion have been secured for each of the Bałtyk 2 and Bałtyk 3 projects.

This document is the Livelihood Restoration Plan (LRP) for the offshore components of the Bałtyk 2 and Bałtyk 3 offshore wind farm projects. It is meant to work in accordance with the relevant requirements of EIB's Environmental and Social Standards, IFC's Performance Standards, and the Equator Principles.

The Projects are developed by a 50/50 consortium of Equinor (Norway) and Polenergia (Poland). Both companies specialise in development of renewable energy. While Bałtyk 2 and Bałtyk 3 are two distinct legal entities, one LRP is prepared for both Projects as most of the impacts related to offshore infrastructure are common, and these impacts can and should be addressed jointly.

An LRP for the onshore components of the Projects was prepared in 2024 as part of a previous exercise conducted by the same team.

1.2 Limitations:

The preparation of this LRP encountered several limitations arising from both the availability and quality of primary and secondary data. With regard to fisheries data, it should be noted that official logbooks were in many cases filled in manually, which presents a risk of human error. Additionally, the limited space available in the forms for reporting fishing squares may have led to omissions or generalizations in the information provided.

Concerning the electronic catch reporting system, smaller vessels under 12 meters in length underwent a transition from paper-based to electronic reporting, which generated errors and inconsistencies in the transfer of records. The historical data for these vessels, based on paper reporting, are therefore less precise and consistent. The transition to full electronic reporting in 2024 also caused difficulties, as the data migration led to inconsistencies in the official register.

Recreational fisheries data are also subject to limitations. The research programme conducted by the National Marine Fisheries Research Institute (MIR) on recreational vessels was based on a small sample of angling trips, and thus the data cannot be considered fully representative. To supplement these data, additional analyses were conducted using GIS tools as well as information obtained directly from anglers, including through surveys and internet sources.

Another significant limitation should also be noted in the regulatory area. The proposed regulations concerning the compensation system for the fisheries sector, which are important in the context of this LRP, have not yet been implemented and remain at the drafting stage. This introduces a degree of uncertainty, as future changes may affect the framework of the compensation mechanism.

1.3 Project Summary Background

Equinor and Polenergia are developing the Bałtyk 2 and Bałtyk 3 offshore wind farm projects of the Baltic shore of Pomerania in the Exclusive Economic Zone of Poland. The Projects, in summary, will have the following characteristics:

- Installed capacity: 720 MW for each of the two wind farms (50 wind turbines each);
- Distance from shore:
  - Bałtyk 2: 37 km,
  - Bałtyk 3: 22 km;
- One common landfall site for the two wind farms is located approximately 3 km to the West of the port of Ustka;
- Onshore connection cable infrastructure in one common corridor and in two sections:
  - First, for both farms, up to two sub-stations located near the settlement of Pęplino (8 km long); each sub-station requiring a surface area of 8 hectares
  - Further to an existing sub-station (6 km long) located close to the settlement of Wierzbięcin (near the town of Słupsk), where the Project infrastructure will connect to the Polish National Grid.

An Operations and Maintenance base will also be built in Łeba on existing industrial land to cater for the needs of operations. This will not be part of Projects finance and is therefore considered an Associated Facility in the sense of IFC's (Performance Standard (PS) 1.

Although the Projects are located in Pomerania province and the relevant Maritime Affairs Office is located in Gdynia, the Szczecin Maritime Affairs Office is also involved because the Area of Influence intersects Western Pomerania to the West. The map (Figure 1) shows an overview of the Projects.

1.4 Efforts to Avoidance and Minimisation of Economic Displacement

The principal instrument for avoiding and minimising economic displacement is the maritime spatial plan. The siting of the Bałtyk 2 and Bałtyk 3 offshore wind farms complies with the spatial development plan for internal maritime waters, the territorial sea, and the exclusive economic zone, adopted by the Council of Ministers on April 14, 2021 (Journal of Laws 2021, item 935). The draft plan was subject to broad public consultation prior to its adoption; this process lasted several years and was well documented. The draft plan and the associated Environmental Impact Assessment were available to the public from June 19, 2018 to August 1, 2018. Updated documents were made publicly accessible again from August 8, 2019 to September 27, 2019. Four open consultation meetings and a number of sectoral meetings, including those focused on fisheries, were held. Additional analyses and studies were carried out during the planning process, including a detailed localization of fishing grounds for vessels over 12 meters in length, based on interviews with 267 fishermen across 53 locations (approximately 72% of the population of fishermen).

The investor has also conducted comprehensive consultations with stakeholders concerning the implementation of the Projects. These actions are also intended to avoid or minimise potential economic effects associated with the projects. Both past and planned activities are described in detail in the Stakeholder Engagement Plan (SEP 2022, updated in 2024).

Efforts undertaken to minimize potential economic impacts have resulted in a choice of locations that entail minimal impacts to fisheries, as evidenced in this LRP: in 2024, total catches in the eight affected fishing squares represented 0.46% of the total catch (by weight) and 0.7% of the total catch value recorded for the entire Polish Maritime Area. Fishing productivity in these fishing squares is low, amounting to only about 5% of the fishing productivity for the Polish Maritime Area as a whole.

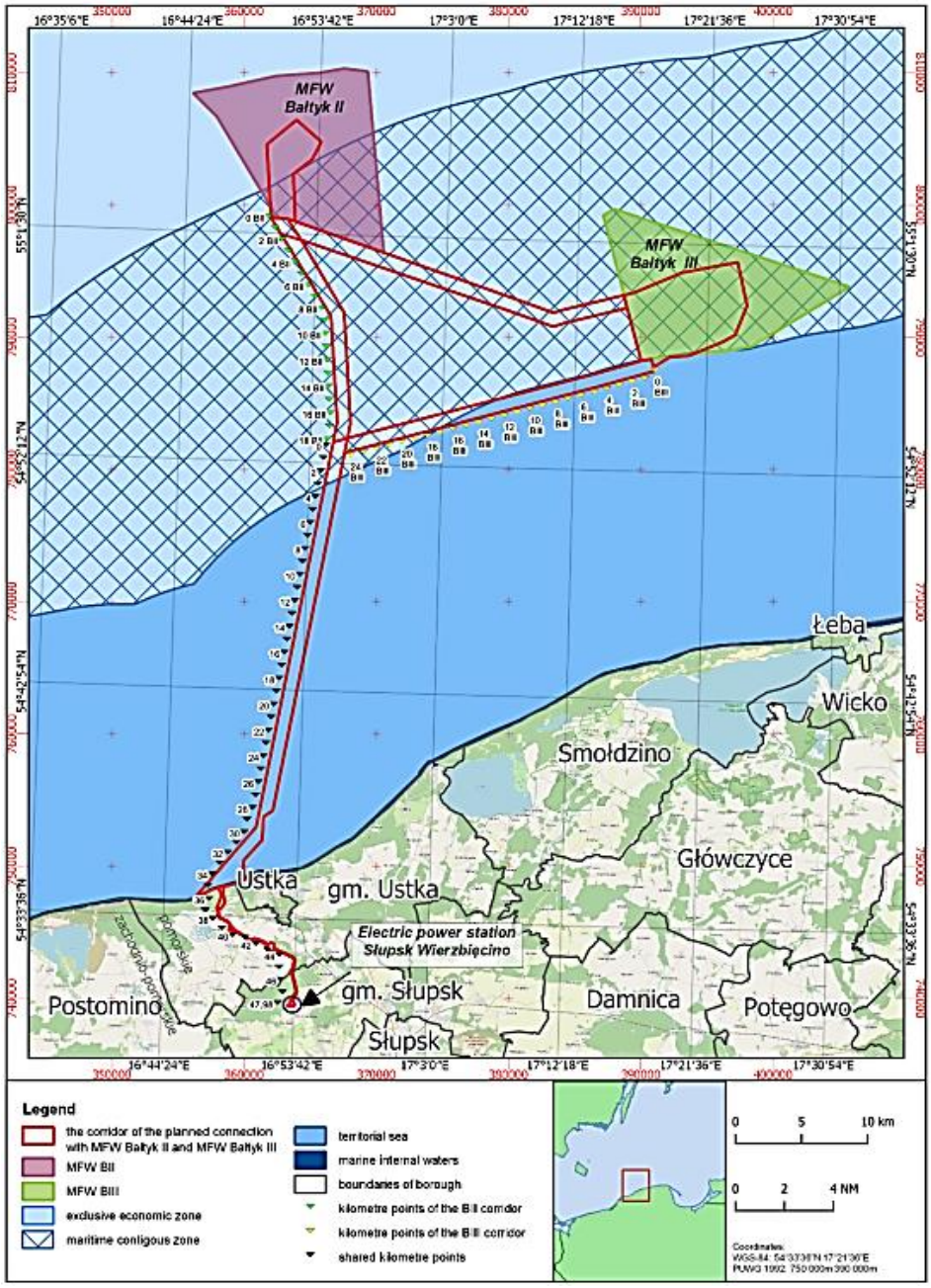
1.5 Authors

This LRP was prepared by Sotis Advisors Team: Katarzyna Auffret-Twardowska, Anita Kuliś and Klaudia Drosio, Polish environmental and social experts, Krzysztof Cieszkowski, fisheries expert, and Frédéric Giovannetti, international social & resettlement expert, in

cooperation with the JVs team. The LRP preparation team worked on the preparation of this document from February to August 2025.

The assignment involved a detailed review of the internal documentation collected by the Project team with regards to environmental and social impacts, baseline studies, environmental impact assessments, decisions of the Polish Government, interviews with Project representatives, as well as a field visit to the Project area in March 2025 (the previous one took place in April 2024 during the preparation of the LRF), conducting surveys and consultations with local stakeholders and affected parties in communities potentially affected by the Project (see chapter 6).

Figure 1 Map of Key Projects Components



Source: EIA Report for ECI of the MFW Bałtyk II and MFW Bałtyk III, EKO-KONSULT Gdańsk, March 2023

2 Legal Background

Applicable standards include the following:

- Polish and EU relevant legislation and regulations;
- Relevant international lender environmental and social policies and standards, including the following:
  - International Finance Corporation (IFC) Performance Standards (PS), specifically PS5 (2012);
  - European Investment Bank (EIB) 2022 Environmental and Social Handbook, including Standard 6;
  - Equator Principles IV.

2.1 EU and National Regulations

Key relevant EU regulations are listed below and described in more detail in Annex 1:

- Convention on the Protection of the Marine Environment of the Baltic Sea of 22 March 1974, updated in 1992, ratified by Poland on 18 June 1980 and by EC/EU on 21 Feb 1994[1];
- Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive)[2];
- Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning[3];
- Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information and repealing Council Directive 90/313/EEC [4];
- Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment[5];
- Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (codification)[6];

1 eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31994D0157
2 EUR-Lex - 32008L0056 - EN - EUR-Lex (europa.eu)
3 eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2014:257:FULL
4 eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32003L0004
5 eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042
6 Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment Text with EEA relevance (europa.eu)

- Council Directive 92/43/EEC of 21 May1992 on the conservation of natural habitats and of wild fauna and flora[7];
- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds[8].

Polish regulations relevant to the Projects are listed below and presented in Annex 2:

- Act of December 17, 2020 on promoting electric energy production in offshore wind farms[9];
- Act of July 24, 2015 on the preparation and implementation of strategic investments in the field of transmission networks[10];
- Act of 18 August 2011 on maritime safety[11];
- Act of 21 March 1991 on maritime areas of the Republic of Poland and maritime administration[12];
- Act of 18 September 2001 – Maritime Code [13];
- Act of July 20, 2017 - Water Law [14];
- Act of October 3, 2008 on providing information about the environment and its protection, public participation in environmental protection and on environmental impact assessments[15];
- Act of 7 July 1994 - Construction Act [16].

2.2 International Requirements

2.2.1 European Parliament Resolution

On July 7 2021, the European Parliament adopted a resolution on the impact on the fishing sector of offshore wind farms and other renewable energy systems[17]. Amongst others, this resolution calls for the following:

(quote)

[7] eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043
[8] Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (europa.eu)
[9] consolidated text Journal of Laws of 2024, item 182, 1828, 1847
[10] consolidated text Journal of Laws of 2024, item 1199
[11] consolidated text Journal of Laws of 2024, item 1068, 1933
[12] consolidated text Journal of Laws of 2024, item 1125, of 2025, item 409
[13] consolidated text Journal of Laws of 2023, item 1309
[14] consolidated text Journal of Laws of 2024, items 1087, 1089, 1473, of 2025, item 216
[15] consolidated text Journal of Laws of 2024, item 1112, 1881, 1940
[16] consolidated text Journal of Laws of 2025, item 418
[17] Texts adopted - The impact on the fishing sector of offshore windfarms and other renewable energy systems - Wednesday, 7 July 2021

- "17. Stresses that OWFs should, whenever possible, be placed in zones where fishing is not permitted, in order to minimise negative impacts on the fishing industry;
- 18. States that OWFs can have an impact on fisheries by changing the spatial distribution and abundance of commercially fished marine species as well as through their closure for safety reasons or the imposition of a change in fishing activity or method, for example from active to passive;
- 19. Insists on the establishment of dialogue and cooperation with fishers at an early stage in the process; emphasizes the need to take into account local ecosystems and the specificities of the local community; highlights the need for proper compensation for fishers if the establishment of OWFs affects their activities; (...)
- 23. Stresses that small-scale and coastal fishers will be particularly affected if displacement takes place, as they may not have the capacity to move to fishing grounds further afield or to change fishing method, particularly if OFWs are located in territorial waters (12 nautical miles from the coast); calls for appropriate compensation as a last resort;
- 24. Stresses the need to facilitate access to insurance for fishing vessels operating in or sailing through areas with OWFs, as it is currently very problematic owing to the insufficient indemnity levels offered by fishing vessels' insurance policies;
- 25. Points out that any restriction on access to traditional fishing grounds directly affects the livelihoods of fishers from the different coastal EU Member States and dependent jobs ashore; stresses, therefore, that appropriate compensation should be given as a last resort when necessary; furthermore, points out that restrictions on access could undermine the responsible and sustainable provision of food security."

2.2.2 Lenders Requirements

Financing for the Bałtyk 2 and Bałtyk 3 offshore wind farms will be provided by about 30 Polish and international financial institutions (Lenders), that apply a set of environmental and social requirements. While these differ in letter, they converge in spirit. There are three sets of environmental and social policies that will be applied by Lenders to the Projects:

- The International Finance Corporation (IFC) applies its Performance Standards (PS), namely PS5 "Land Acquisition and Involuntary Resettlement". IFC's PSs are also applied by other lenders, including most bilateral Export Credit Agencies, and the Equator Banks. The latter apply in addition the Equator Principles (IV);
- The Equator Principles (IV);
- The European Investment Bank (EIB) applies its 2022 Environmental and Social Standards. The standard relevant to displacement impacts and livelihood restoration is Standard 6 "Involuntary Resettlement".

While focusing on the impacts of land acquisition, all these "resettlement" standards also clearly address restrictions to the use of natural resources, including maritime resources and fish stocks, hence are applicable to the impacts of restrictions to navigation or access

to fishing grounds, which are considered as potential impacts to livelihoods, that is "economic displacement" and are covered as such by "resettlement" standards. Key requirements of these standards that are pertinent for the Projects offshore components are the following:

- Displacement (including "economic displacement", that is impacts to livelihoods) should be avoided or minimised exploring technically and economically feasible Projects design alternatives;
- Affected livelihoods should be improved or re-established to their previous levels, based on the simple principle "not worse-off if not better-off"; "livelihood" as understood by international standards is a broad concept that includes income, access to services, quality of life, amongst others;
- All plans to mitigate or compensate impacts to livelihoods and re-establish them where residual impacts are unavoidable should be thoroughly consulted upon with affected groups, taking into consideration the specific needs of women and disadvantaged groups as applicable; this includes disclosure of mitigation plans and consultation in culturally sensitive events;
- Plans should be monitored and evaluated.

3 Relevant Polish and European Benchmarks

3.1 The Sector Deal

In September 2021, offshore wind energy developers, the government party and other stakeholders agreed on a multi-stakeholder 'Sectoral Agreement' to support offshore wind energy development (so-called "Sector Deal"). The agreement was to establish a permanent platform for cooperation between government and local administration, current and future investors and operators of offshore wind farms in Poland, as well as representatives of the supply and service chain, scientific and research entities and financial and insurance institutions.

Cooperation between representatives of the fishing community and investors takes place within the framework of Working Group 6: Stakeholder Cooperation and Regulatory Environment, Subgroup 3: Cooperation in the Area of Fisheries. The meeting of this subgroup was devoted to work on Amendment of the Offshore Wind Act (UD162) and legal changes in the scope of compensation for fishers. The subgroup dedicated to cooperation with fishers has been merged with the subgroup dedicated to offshore permitting simplification.

One of the activities within the Sector Deal was the development of the "Code of Good Practice" in the area of coexistence of OWF with fisheries. Work on the code was coordinated by the Polish Wind Energy Association (PWEA), which entrusted this development to a team of experts from the University of Gdańsk. Currently, the draft Code of Good Practice has been in the process of being reviewed by ministries for a long time, although the time schedule and procedure for this review are not known.

3.2 Transitional Compensation

Compensation for fishers in connection with offshore wind farms in the Baltic Sea is to be addressed in a regulation prepared by the Ministry of Agriculture and Rural Development and the Ministry of Climate. Currently, due to the lack of regulations, Baltic Power, which was the first in the country to start the construction of an offshore wind farm, has prepared and is implementing a bridging solution regulating the payment of compensation. This mechanism, the only one that exists on the market to this day, is briefly presented below.

The "Transitional Compensation Scheme" developed by Baltic Power is aimed at:

- Fishers whose vessels conducted fishing in squares N7, N8, O6, O7 and O8, covering the area of the Baltic Power wind farm and cable connection in the years 2018-2023,
- Owners of angling/recreational vessels actively angling in 2018-2019 in the area of fishing squares: O6, O7, O8, N7, N8.

The amount of compensation under this system for commercial fishing vessels depends on the length of the vessel (from PLN 15,200/year for the smallest units below 8 m in length to PLN 48,700/year for vessels over 40 m in length). Compensation for the wind farm construction period is paid in two tranches: the first tranche for the period of November and December 2024 and the entire year 2025, the second tranche for 2026.

For recreational vessel operators, the compensation payment is a one-off payment of 35,000 PLN/vessel. It applies to vessels stationed in the ports of Łeba, Ustka, Władysławowo or other ports in between.

Compensations are paid from the start of work at sea and will be paid for the construction period or until the official mechanism is announced in the regulation of the Minister of Agriculture and Rural Development. After its publication, the company will adapt to compensation principles specified in the regulation, including for the wind farm's operations phase, i.e. after 2026.

Detailed information about the bridging solution currently implemented by Baltic Power and its principles are available on the Baltic Power website [18].

3.3 Livelihood Restoration

In Poland, there are no regulations governing the payment of damages or compensation to fisheries in the event of loss of income source or increased labour or other costs resulting from offshore investments. In the event of difficulties in fishing caused by an Offshore Wind Farm, Polish law does not specifically provide for compensation for lost income. The granting of compensation or support for social groups losing income is part of international practices and is occasionally implemented by Polish investors, but is not prescribed by Polish law.

3.3.1 Financial Assistance for Commercial Vessels

3.3.1.1 EU financial aid

Polish fishers have been and are beneficiaries of the following EU operational programmes:

- Sectoral Operational Programme "Fisheries and Fish Processing" in 2004-2006,
- Operational Programme "Sustainable Development of the Fisheries Sector and Coastal Fishing Areas" in 2007-2013,
- Operational Programme “Fisheries and the Sea” in the years 2014-2020,
- European Funds for Fisheries (pol. FER) for 2021-2027, implementing the European Maritime, Fisheries and Aquaculture Fund (EMFAF) in Poland[19].

[18] Baltic Power

[19] O programie - Ministerstwo Funduszy i Polityki Regionalnej (rybactwo.gov.pl)

According to the information published on the government websites[20]: "In the case of commercial fishing vessels under the European Funds for Fisheries programme for the years 2021-2027, calls for applications for the action of permanent cessation of fishing activities - scrapping or reclassification of a fishing vessel were announced in December 2023 and January 2024, for a total amount of PLN 315,000,000. Additionally, two calls for applications for permanent cessation of fishing activities - loss of job on a fishing vessel, for a total amount of PLN 79,000,000 were launched."

The current list of operations implemented under EMFAF, as of 31 March 2025[21], includes 789 beneficiaries who received funding from this programme for the scrapping of a fishing vessel, temporary cessation of fishing activities of a fishing vessel or loss of a job on a fishing vessel[22].

The table below shows the main planned calls for proposals found in the Call for Proposals of the Ministry of Funds and Regional Policy, effective from 2 April 2025[23]. From Priority 1 of the European Funds for Fisheries 2021-2027, entities that have not embarked on a permanent cessation of fishing activities, will be able to obtain financial support under the following measures:

Table 1 Selected planned calls for proposals under the European Funds for Fisheries programme

Measure	Types of projects that can receive funding	Application submission time / Applicants
Human Capital	1) Improving existing or acquiring new professional qualifications in the areas of sea fishing or inland fishing; 2) Acquiring new professional qualifications other than those specified in point 1; 3) Creating a network of contacts and exchanging information in the areas of sea fishing or inland fishing.	October 2025 Among others: 1) Owner or operator of a fishing vessel used for commercial fishing, 2) Fisherman - a natural person conducting commercial fishing activities
Innovation	Development, conducting scientific research, testing or implementation of new solutions for sea fishing, inland fishing or processing of fish products within the meaning of Art. 3 item 3 of the Act on the organization of the fish market, hereinafter referred to as "fish products"	November 2025 Among others: Operator of fishing vessel used for commercial fishing

[20] Projekt ustawy o pomocy państwa skierowanej do armatorów jednostek pływających w związku z wprowadzeniem zakazu połowu dorsza na Morzu Bałtyckim - Kancelaria Prezesa Rady Ministrów - Portal Gov.pl

[21] Lista operacji realizowanych w programie Fundusze Europejskie dla Rybactwa - stan na 31 marca 2025 (art. 50 ust. 1 lit a) - Ministerstwo Funduszy i Polityki Regionalnej and Lista operacji art. 50 ust. 1 lit. d Rozporządzenia Parlamentu Europejskiego i Rady (UE) 2021/1060 - Ministerstwo Funduszy i Polityki Regionalnej

[22] 50a_31_03_25.pdf and 50d_31_03_25.pdf

[23] Wzór harmonogramu

Measure	Types of projects that can receive funding	Application submission time / Applicants
Diversification of fishing activities	1) Development of existing fishing activities or development of additional economic activities other than fishing activities; 2) Starting a new economic activity; 3) Use of energy from renewable energy sources or recovery of energy in existing activities.	June – July 2025 November 2025 Among others: Fishing vessel operator who is also the owner of the vessel, that is used for commercial fishing
Temporary cessation of fishing activities	Financing based on unit rates, at daily rates for each day of cessation of fishing activities using a given fishing vessel - 30 days of lay-up.	August 2025 Among others: 1) Operator of a fishing vessel used for commercial fishing, the overall length of which is: a) less than 12 m, b) from 12 m to 24 m – if the operator of that fishing vessel held fishing quotas for at least two species of marine organisms covered by the general fishing quota in the special fishing permit issued for that fishing vessel in the period of three years prior to the date of submission of the application for funding; 2) if the conditions referred to in Article 21 of Regulation 2021/1139 have been met.

Source: Schedule of Calls for Proposals of the Ministry of Funds and Regional Policy, valid from May 21, 2025

3.3.1.2 Draft Amendments to Regulations (2025)

The RCL is currently processing a draft amendment to the Act on promoting electric energy production in offshore wind farms and certain other acts[24]. The original version of the project (dated 6 February 2025), which is currently the subject of government work, is available on the RCL website[25].

In this version, the draft introduced, among other things, amendments to the Act on promoting electric energy production in offshore wind farms, by creating a legal basis for the payment of compensation to operators of fishing vessels for the loss of financial

[24] https://legislacja.rcl.gov.pl/projekt/12394351/katalog/13110272#13110272
[25] dokument704009.docx

benefits resulting from the construction, operation, and decommissioning of an offshore wind farm and the associated power evacuation infrastructure (draft Article 84b).

On June 11, information appeared on government websites[26] that in the course of inter-ministerial consultations, the addition of Article 84b to the Act on the promotion of electricity generation in offshore farms was abandoned. According to information provided, this issue will be analysed as part of further legislative work. More detailed information about this draft law is presented in Annex 4.

3.3.2 Financial Assistance for Recreational (Angling) Vessels

Fishers conducting recreational activities (angling) are not covered by the financial support system from EU funds. One-off financial assistance from the State took place in connection with the COVID-19 pandemic in 2020. Work is currently underway on the act on state aid to operators of recreational vessels in connection with the ban on cod fishing in the Baltic Sea.

3.3.2.1 Financial assistance to recreational vessels operators in relation to the COVID-19 pandemic

A regulation of the Minister of Maritime Economy and Inland Navigation of 26 June 2020 details conditions for financial support for shipowners or operators of commercial yachts used for recreational fishing[27]. This regulation was introduced on the basis of the Act of 20 March 2020 on special solutions related to the prevention, counteracting and combating of COVID-19, other infectious diseases and crisis situations caused by them[28]. The regulation expired on December 31, 2020. The purpose was to provide financial support to businesses losing income in connection to the COVID-19 pandemic. The beneficiaries were the owners or operators of commercial yachts who, as a result of the state of epidemic introduced in Poland from 20 March 2020 until further notice, related to SARS-CoV-2 virus infections, could not conduct so-called recreational fishing.

Financial support was granted in the event of scrapping a yacht, transferring it or adapting a commercial yacht to perform another activity.

Support was granted in the form of a one-off compensation, which amounted to PLN 200,000 per yacht (minimum PLN 100,000), both in the event of scrapping a yacht, transferring it or adapting it to perform another activity.

[26] https://legislacja.rcl.gov.pl/projekt/12394351/katalog/13110260#13110260
[27] DZ. U. poz. 1167
[28] Dz. U. z 2024 r. poz. 340, z późn. zm.

In 2020, financial support was granted in the total amount of PLN 14,000,000 and was paid to all applicants who met the conditions for its granting. 107 cases were considered, of which 58 applications met the conditions for granting support.

3.3.2.2 Draft Law 2025

A new law is being drafted to address state aid to vessel operators affected by the ban on cod fishing in the Baltic Sea[29]. Its purpose is to provide financial support to vessel operators to move away from fishing in connection with the cod ban introduced on 1st January 2020. The aid that would be granted under this Act is meant to offset the economic situation for operators affected by the cod ban, albeit excluded from EU support.

The draft Act concerns vessels intended or used exclusively for sports or recreation.

More detailed information about this draft law is presented in Annex 4.

[29] Projekt ustawy o pomocy państwa skierowanej do armatorów jednostek pływających w związku z wprowadzeniem zakazu połowu dorsza na Morzu Bałtyckim - Kancelaria Prezesa Rady Ministrów - Portal Gov.pl and Projekt

4 Project Impacts

4.1 Projects Maritime Footprint

The offshore wind farms and export cables intersect a number of “fishing squares” (the unit within which fishing vessel movements and catches are monitored): L5, L6, L7, L8, M7, M8, N7, N8 – see map below.

On this basis, the affected area was determined, assuming a buffer of 500 m[30] from the outline of the wind farms and on both sides of the cable. This affected area includes 5 Projects areas, in which analyses were carried out later in this document:

- Bałtyk 2 wind farm,
- Bałtyk 2 cable corridor,
- Bałtyk 3 wind farm,
- Bałtyk 3 cable corridor,
- Bałtyk 2 & Bałtyk 3 common infrastructure connection.

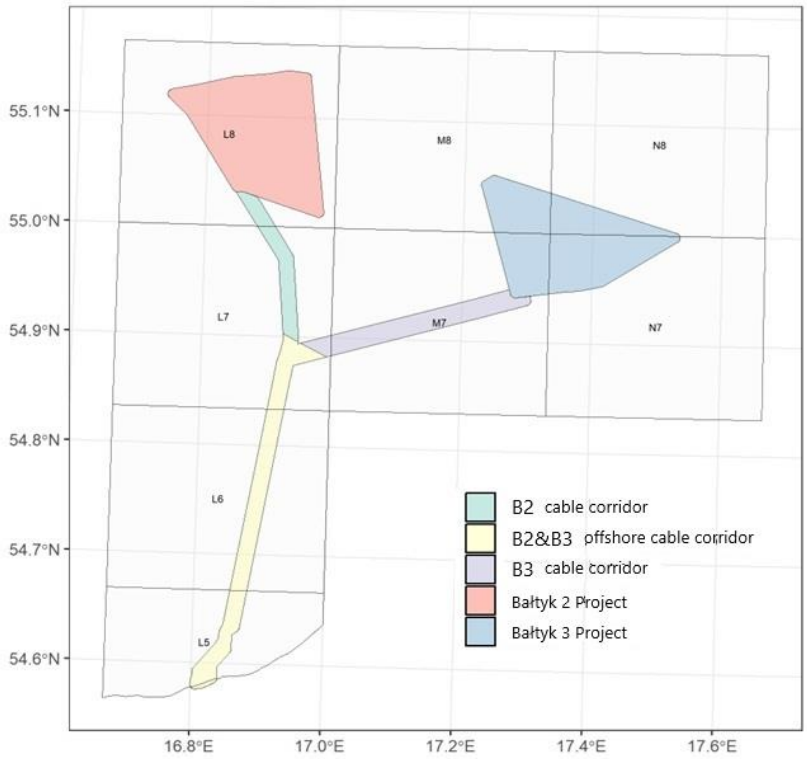
The map below shows the affected fishing squares with the footprint of the wind farms and export cable corridor superimposed (including a 500 m buffer):

[30] According to Article 60 of the United Nations Convention on the Law of the Sea (UNCLOS), a coastal State may establish a safety zone around artificial islands, installations, and structures in the Exclusive Economic Zone, the breadth of which shall not exceed 500 meters around each structure, measured from each point of its outer edge. Therefore, 500 meters is the standard maximum safety zone width specified in UNCLOS Article 60(5).

Bałtyk 2 and Bałtyk 3 wind farms are located in the exclusive economic zone.

A safety zone of up to 500 meters is also established under Polish law. The basis for this is Article 24 of the Act on Maritime Areas of the Republic of Poland and Maritime Administration, which implements international standards – including the UNCLOS – into the national legal system. The zone covers an area of up to 500 meters from the outer edge of a wind farm or other marine installation, and the authority to establish it rests with the director of the competent maritime office. Within this zone, it is possible to introduce restrictions, for example, on navigation, fishing, or water sports.

Figure 2 Affected fishing squares and footprint of Projects facilities



Source: Sotis (MIR), 2025

4.2 Affected Ports

Fishing vessels operating (fishing) in the affected area in the period 2018-2024 and registered as of 29.04.2025 were identified as potentially affected fishing vessels based on CMR (pl. Centrum Monitorowania Rybołóstwa, Fishing Monitoring Centre) data held by the MIR (pl. Morski Instytut Rybacki Państwowy Instytut Badawczy, National Marine Fisheries Research Institute), including Vessel Monitoring System data (VMS) and e-logbooks data or monthly catch reports data.

Based on available registration data, ports of registration of these vessels were identified as the ports of origin.

There are 11 ports of origin (from west to east): Dziwnów, Mrzeżyno, Kołobrzeg, Unieście, Darłowo, Jarosławiec, Ustka, Rowy, Łeba, Władysławowo, Hel.

At an earlier stage of work on the LRP (at the stage of conducting surveys), based on data from MIR for the period 2018-2023, 14 ports of origin had been identified. However, updating the data in April 2025 allowed to eliminate ports in Świbno, Niechorze and Ustronie Morskie, because the vessels originally identified from these ports fishing in the

project area have been removed from the updated Fleet Register, which means that they have been scrapped.

In addition, one fishing vessel was identified as fishing in the Projects areas in the year 2024 although registered in the port of Nowa Pasłęka. However, this vessel is in fact operating from the port in Łeba and has been considered as such.

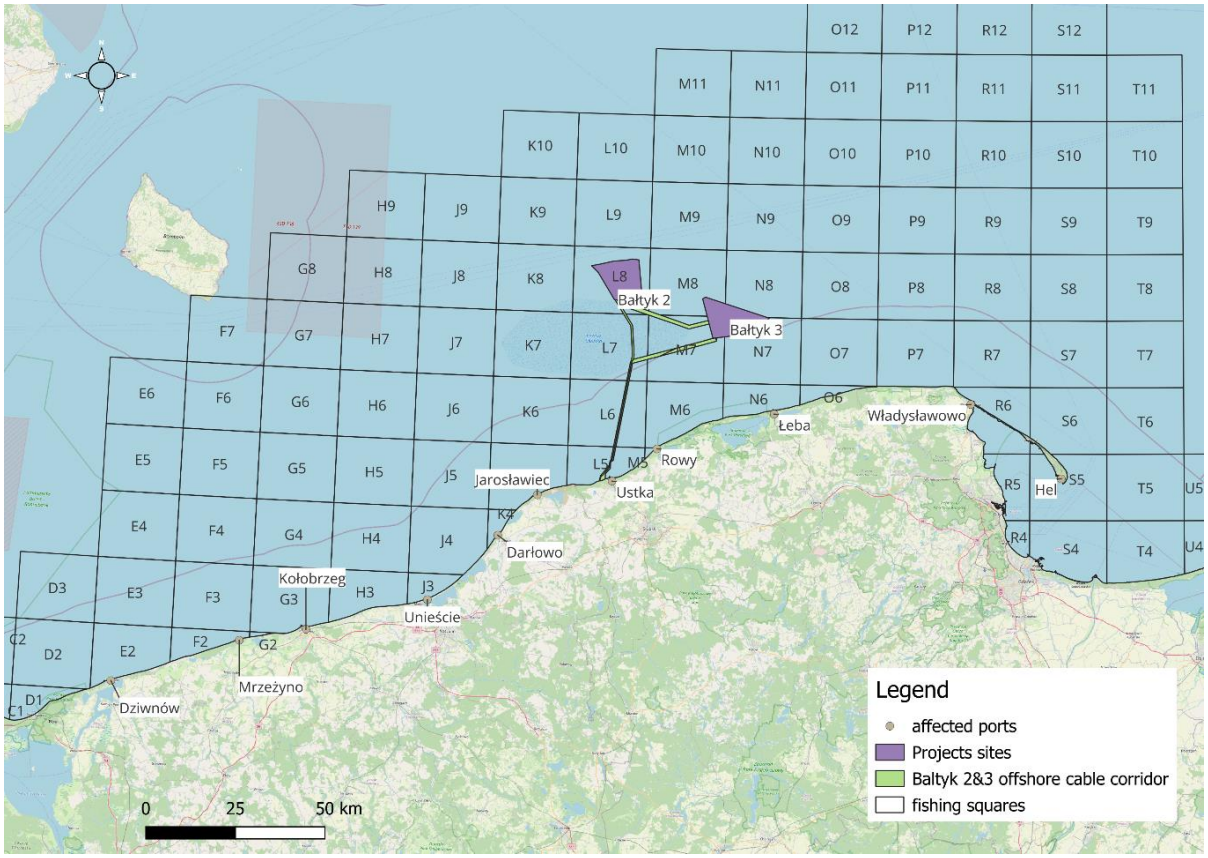
Updated information on ports of origin and the number of potentially affected fishing vessels in relation to the data presented in the Survey Report is presented in the table below. Ports of origin are also shown on the map below.

Table 2 Ports of origin and number of potentially affected fishing vessels

No.	Ports of origin	Number of potentially affected fishing vessels
1	Darłowo	4
2	Dziwnów	1
3	Hel	1
4	Jarosławiec	4
5	Kołobrzeg	8
6	Łeba	12 + 1 (vessel from Nowa Pasłęka)
7	Mrzeżyno	1
8	Rowy	2
9	Unieście	2
10	Ustka	28
11	Władysławowo	3
TOTAL		67

Source: Sotis (MIR) based on CRM data, 2025

Figure 3 Ports affected by the Projects



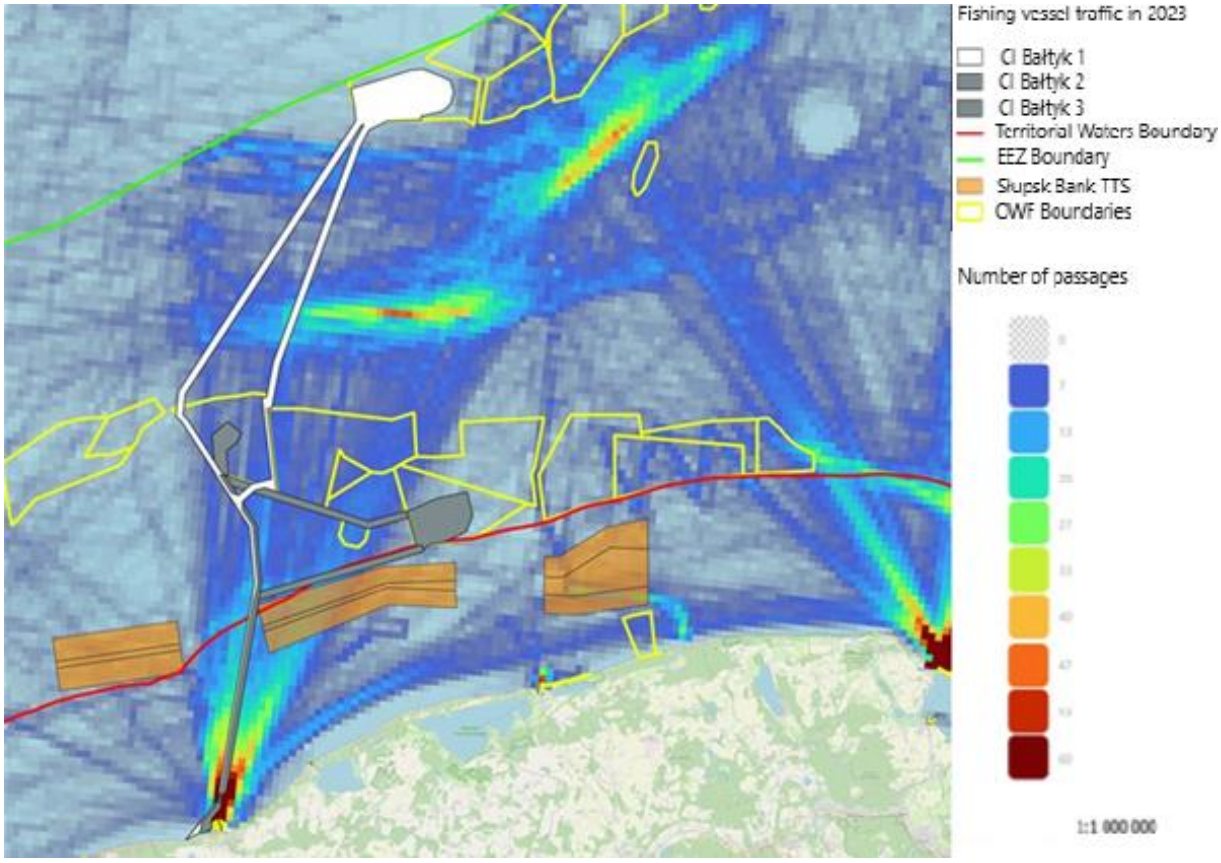
Source: Sotis, 2025

4.3 Affected Vessels

The maps below are taken from the navigation study prepared in 2024 for the Environmental Impact Assessment (EIA) report for the planned offshore wind farm Bałtyk 1, but they also show the Bałtyk 2 and Bałtyk 3 projects in the background.

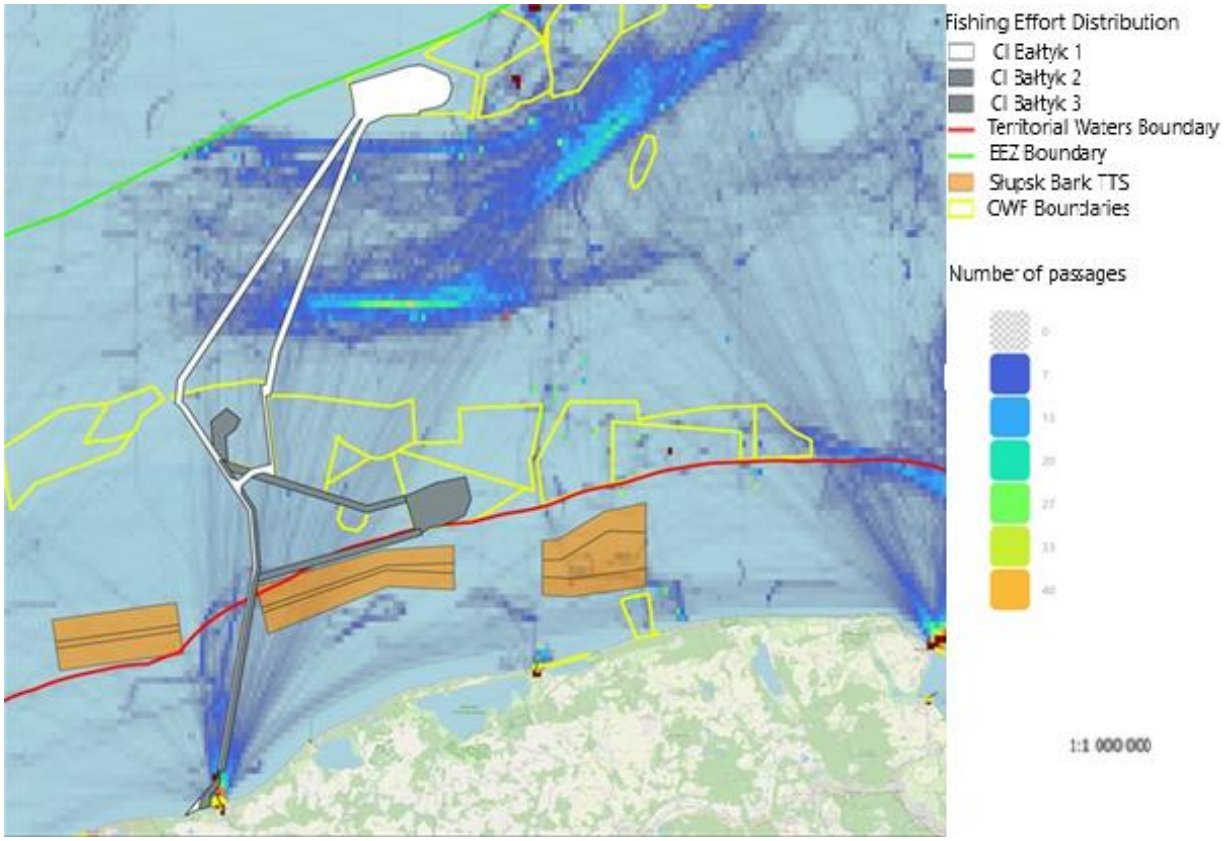
Figure 4 shows the fishing vessels traffic in 2023, regardless of their speed and Figure 5 shows the fishing vessels moving at a speed of less than 5 knots and therefore assumed as engaged in fishing.

Figure 4 Fishing vessels traffic in 2023, based on AIS-PL data – regardless of speed



Source: Navigational Analysis for the external connection infrastructure (ECI) of the MFW Bałtyk I offshore wind farm. Analysis for the needs of the EIA Report, June 2024

Figure 5 Fishing vessels engaged in fishing in 2023, based on AIS-PL data



Source: Navigational Analysis for the connection infrastructure of the MFW Bałtyk I offshore wind farm. Analysis for the needs of the EIA Report, June 2024

The area where the most vessels conducting fishing activities were recorded, is the area of the transmission cable shared by both wind farms, mainly vessels sailing out of the ports of Ustka and Łeba. From these ports and Władysławowo, vessels mainly sailed to fishing grounds further north from the farms.

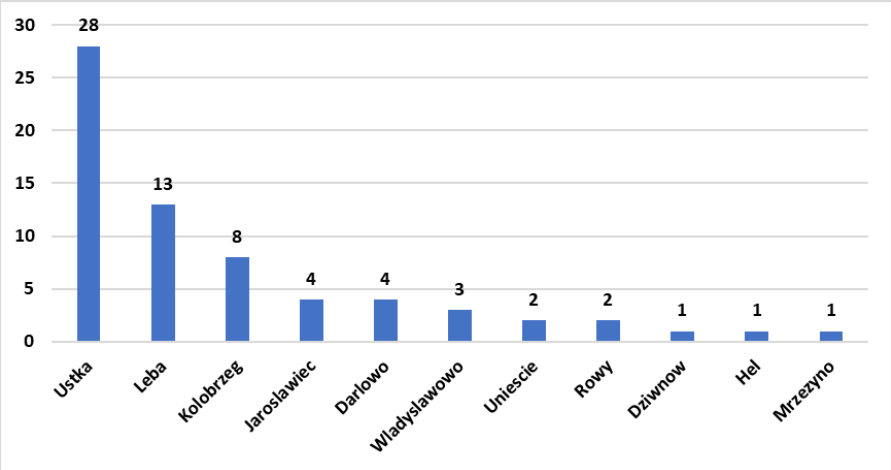
4.3.1 Commercial Vessels

4.3.1.1 Vessels fishing in 2018-2024 in Projects areas

67 fishing commercial vessels registered in the 11 ports of origin as of 29.04.2025 were identified as having fished in the Projects area and its buffer zone in 2018-2024 based on data from the Vessel Monitoring System (VMS) and electronic fishing logbooks or data from monthly catch reports collected by the CRM.

More than 40% of these vessels are registered in Ustka. The distribution by port of origin is presented in the figure below:

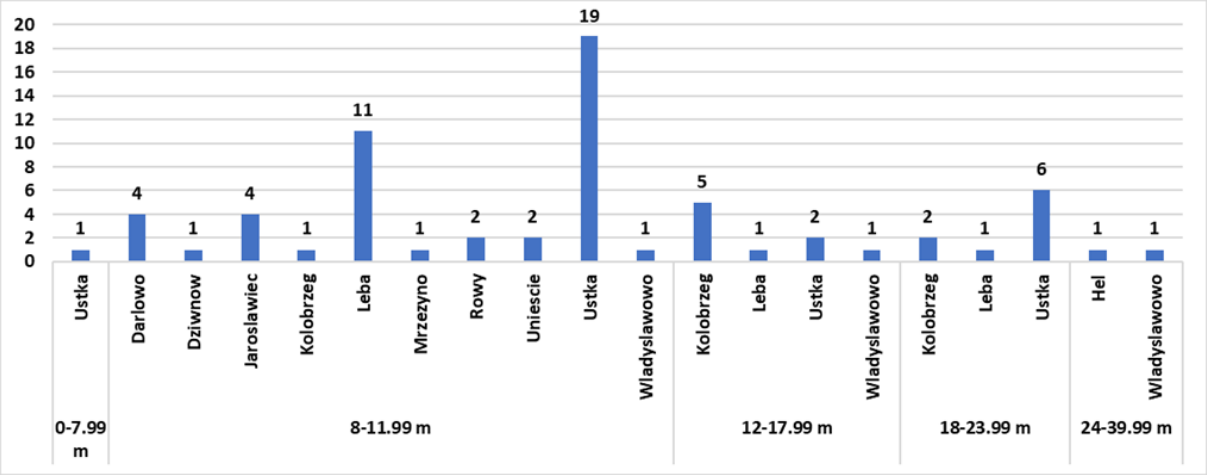
Figure 6 Total number of potentially affected fishing vessels, by port of origin



Źródło: Sotis (MIR) na podstawie danych CMR, 2025

47 of the 67 vessels are less than 12 m in length, what presents figure below:

Figure 7 Total number of potentially affected fishing vessels, by length and port of origin

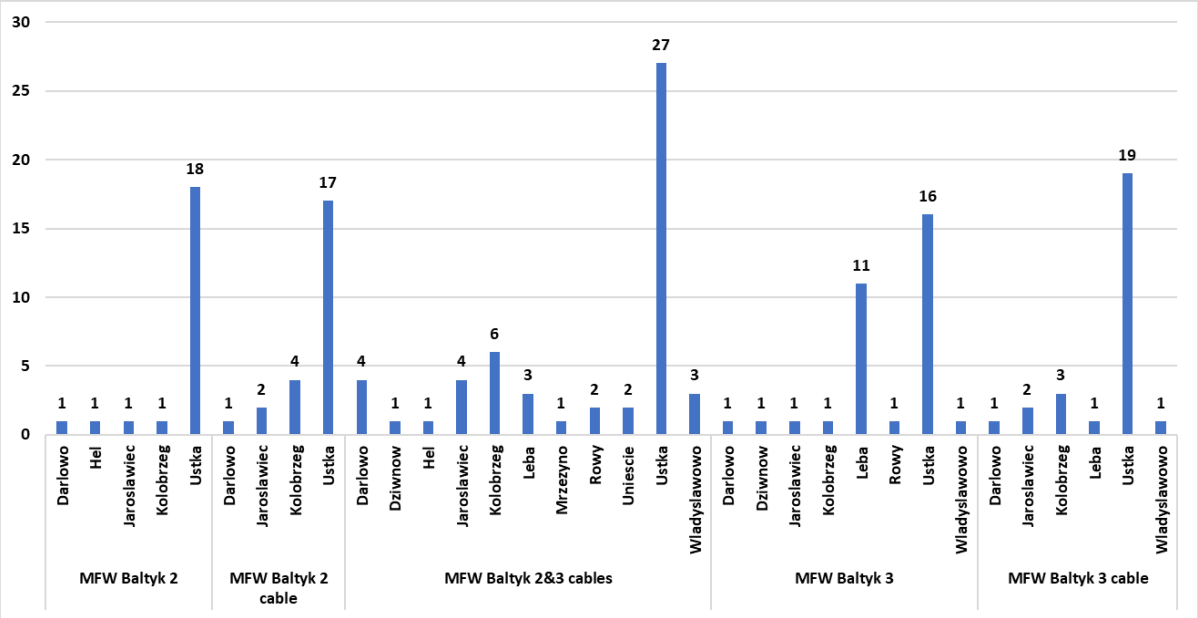


Źródło: Sotis (MIR) na podstawie danych CMR, 2025

Most fishing vessels (54 units) fished in the area of the common infrastructure connection corridor. Vessels from Ustka are also predominant in other areas of the Projects. However, in the Bałtyk 3 area, the share of fishing vessels from Łeba is significant (11 units).

Fishers from Ustka and Łeba are the most exposed to Project impacts: (61% of all 67 boats come from these two ports).

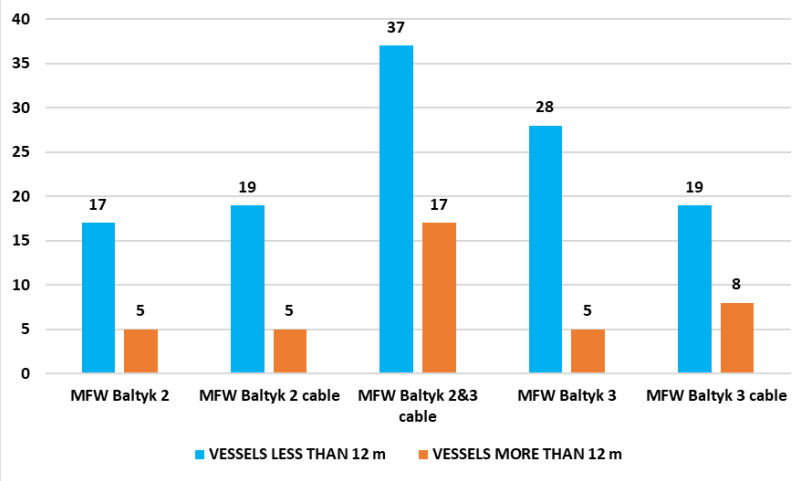
Figure 8 Number of fishing vessels fishing in individual affected areas, by port of origin



Źródło: Sotis na podstawie danych MIR, 2025

Small vessels (less than 12 m long) are generally predominant (see figure below).

Figure 9 Number of fishing vessels fishing in individual affected areas, by vessel size



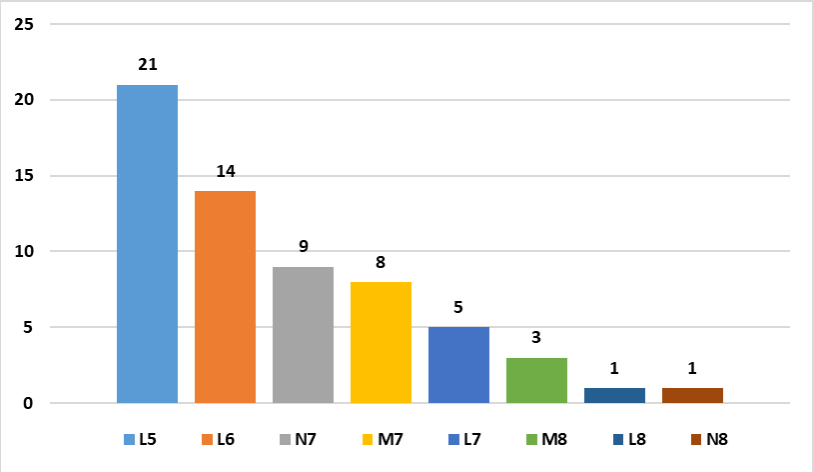
Źródło: Sotis na podstawie danych MIR, 2025

4.3.1.2 Registered fishing activity in 2024

Information from CMR 2024 data shows that when considering the 8 intersected fishing squares in their entirety (which is larger than the affected areas) in 2024, 36 fishing vessels were actively fishing: 24 vessels under 12 m and 12 vessels over 12 m in length.

Below is a presentation of the number of fishing vessels that fished in each of the 8 fishing squares in 2024. This analysis shows that the largest number of vessels fished in squares L5 and L6 (coastal squares).

Figure 10 Number of commercial fishing vessels fishing in affected fishing squares in 2024



Źródło: Sotis na podstawie danych CMR, 2025

4.3.1.3 Special Fishing Permits

Additional analysis was conducted in relation to Special Fishing Permits (SFP), which specify catch quota allocated to a fishing vessel for a given year. Shipowners of fishing vessels are required to submit an application for the issuance of a SFP by 31 October of the year preceding the year for which the permit is to be issued. 257 active fishing vessels hold a 2025 SFP in the 11 ports of origin.

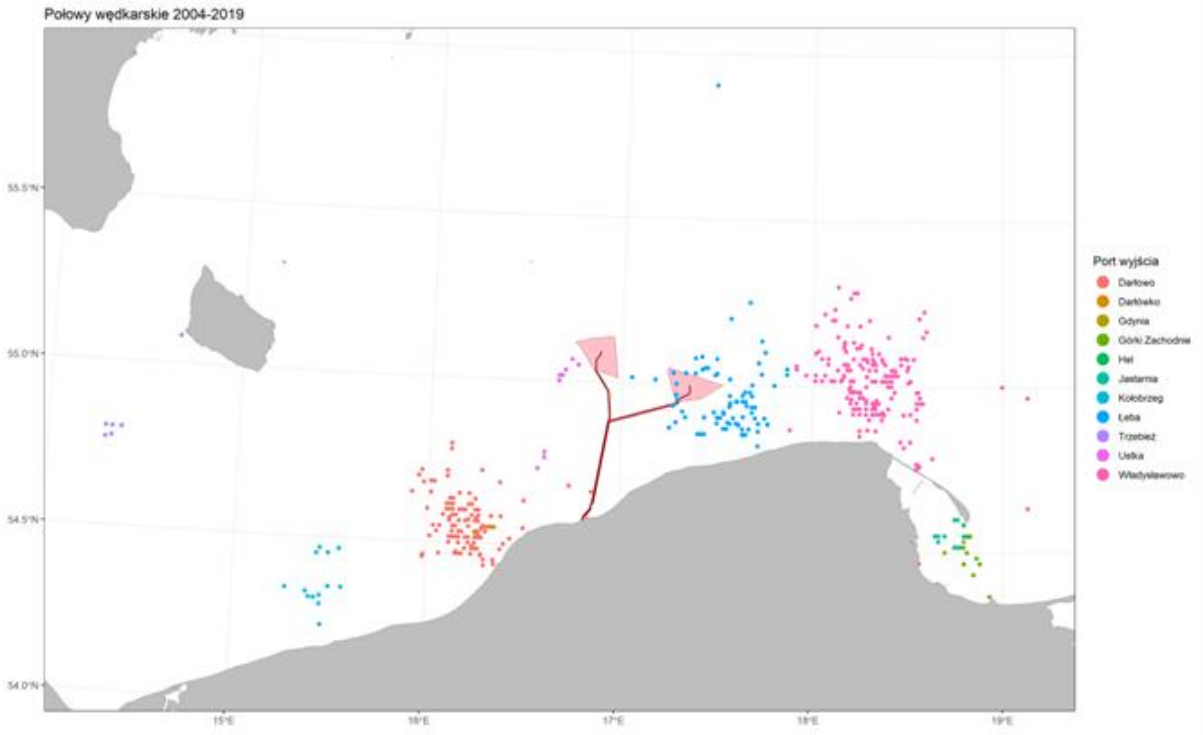
4.3.2 Recreational Vessels

The recreational fleet is more difficult to identify because scrapping, changing the function or the mooring place is ongoing.

To identify this fleet, ports from which angling trips to Projects areas can be carried out were verified through the analysis of MIR data and of average time of recreational (angling) trips, technical restrictions for recreational vessels and distance of the Projects areas from ports of origin.

The fishing spots shown on the map below are angling positions recorded during 174 trips with MIR observers, which took place as part of the Multiannual Fisheries Data Collection Program in 2004-2019 (just before the cod fishing ban). According to this map, vessels from Łeba, Ustka and Darłowo were used for angling in the Projects areas.

Figure 11 Fishing spots of angling vessels identified as part of the Multiannual Fisheries Data Collection Program 2004-2019



Źródło: Sotis (MIR), 2025

Additional analyses based on publicly available information (February-March 2025), geographical information system (GIS) and survey results confirmed that the ports from which angling trips may take place in the Projects areas are Darłowo, Łeba, Ustka and Władysławowo.

The number of operating recreational (angling) vessels in 2018 – 2019 in these 4 ports, based on data from the harbour captains' offices and moored recreational vessels identified by the Sotis team in March 2025, is presented below.

Table 3 Number of recreational vessels operating in 2018 - 2019 and identified in 2025 in 4 affected ports

Port	Recreational (angling) vessels acting in 2018-2019	Recreational (angling) vessels identified in ports on March 21, 2025
Darłowo	22	17
Ustka	13	9
Łeba	24	8
Władysławowo	42	32
Total	101	66

Źródło: Sotis, 2025

These figures indicate a decrease of about 1/3 in the number of recreational vessels in these 4 ports of origin between 2019 and 2025.

4.4 Fishery Activities

This chapter presents the results of analyses carried out based on data obtained from the Fisheries Monitoring Centre (CMR) concerning fishing activities in the eight fishing squares analysed (L5, L6, L7, L8, M7, M8, N7, and N8) in 2024.

In 2024, new EU regulations came into force regarding the digital reporting of catches and monitoring of all fishing vessels, including small units. For vessels under 12 meters, the new obligations will be fully enforced from 2028, with the possibility of some derogations for the smallest boats (below 9 m) until 2030[31]. During the current adaptation period, there may be some distortions or gaps in the data collected by the CMR.

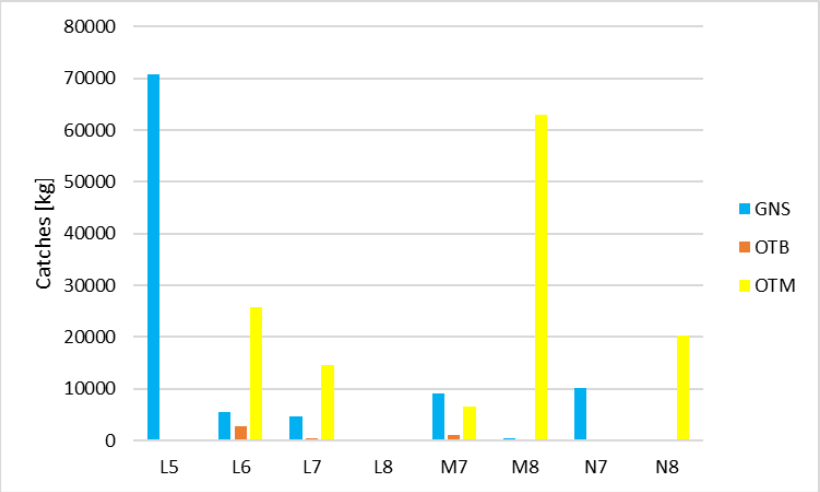
4.4.1 Fishing Techniques

Based on CMR data, the main fishing gear used in 2024 in the affected 8 fishing squares, are as follows:

- OTM – midwater otter trawl – 55.3% of catch weight.
- GNS - set (anchored) gillnets - 42.9% of catch weight,
- OTB - bottom otter trawl - 1.8% of catch weight,

The gear used in fishing in individual fishing squares in 2024, according to the weight of fish caught using them, is presented in the figure below (Figure 12).

Figure 12 Fishing gear used in 2024 in affected fishing squares by catches [kg]



Źródło: Sotis na podstawie danych CMR, 2025

[31] Electronic tracking of SSCF vessels and New EU Control Regulation System Enters Into Force - Life Platform

Conclusions:

- Midwater otter trawl (OTM) is the dominant fishing gear, indicating a targeted approach to pelagic fish species, although potential interaction with the seabed cannot be entirely excluded.
- Set gillnets (GNS) play a significant role, particularly in the coastal zone, where they are used for catching demersal fish species.
- Bottom otter trawl (OTB) accounts for a minimal share of total catches, suggesting limited direct interaction with the seabed in this area.

Potential impact on offshore infrastructure:

- Midwater otter trawl (OTM) generally poses a low risk to seabed infrastructure, as it typically does not contact the seabed, however, special caution should be exercised near cable infrastructure.
- Set gillnets (GNS) may become entangled with subsea structures, buoys, or anchors.
- Bottom otter trawl (OTB), though rarely used, presents the highest risk of physical impact on seabed-based infrastructure, such as cables or scour protection, due to potential direct contact with the seabed.

4.4.2 Catches

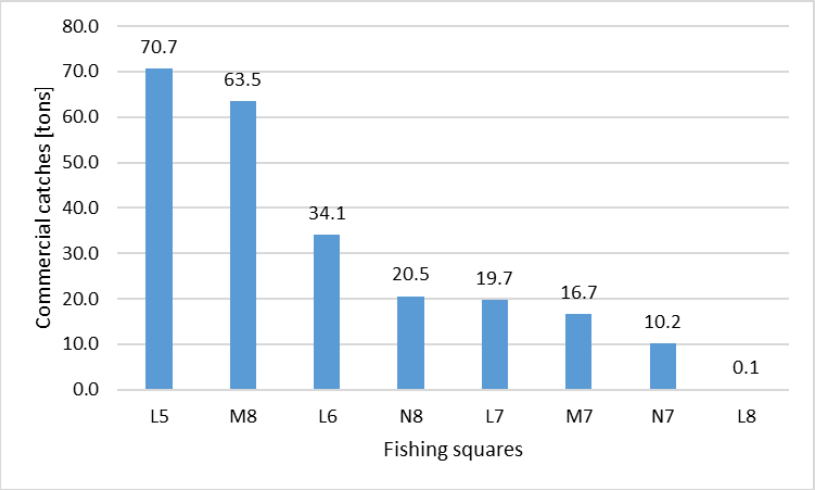
In 2024, the LRF report was prepared, which was based on data fish catches in the 8 fishing squares affected by the Projects, covering the years 2020-2021 and earlier. For the purposes of this LRP report, this data has been updated and the analyses below are based on data from 2024 obtained from the CRM. The analysis of data included complete calendar years, which eliminates the potential influence of seasonal factors

Total catches in fishing squares in 2024 were significantly lower than in previous years and amounted to 235.5 tons (for comparison, total catches in 2020-2021 amounted to 892 tons. It can therefore be assumed that the average was 446 tons per year).

In 2020-2021, the highest catches were recorded in L8 and M8, the lowest in N7.

In 2024 the highest catches were recorded in L5 and M8 (catches in these 2 squares accounted for almost 57% of the total catches in the 8 analysed fishing squares), and the lowest in L8. This shows a drastic decrease in catches in L8 (down to 0.1 tonnes) and the importance of the M8 square for commercial fishing (Figure 13 below).

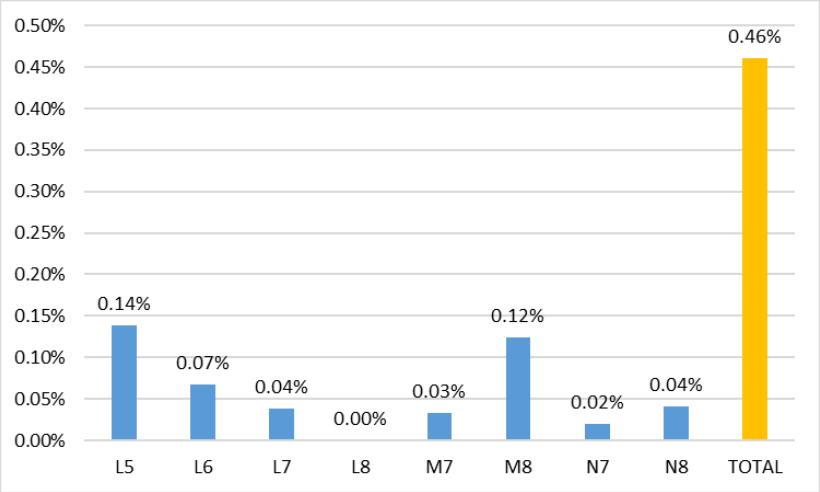
Figure 13 Total catches per affected fishing squares in 2024



Źródło: Sotis na podstawie danych CMR, 2025

Catches per fishing squares in relation to total catches in Polish Maritime Areas [%] are presented below (Figure 14). The catches in the 8 analysed fishing squares in the period of 2 years (2020-2021) amounted to 0.92% of the total catches in Polish Maritime Areas (PMA). Catches in 2024 in these fishing areas accounted for 0.46% of the total catch in the PMA.

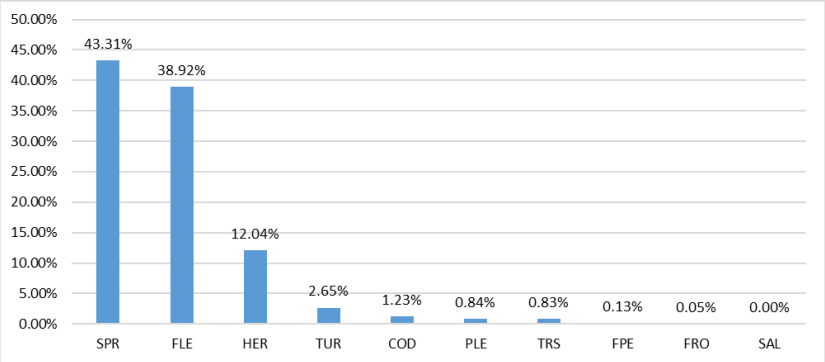
Figure 14 Catches in the affected fishing squares in relation to total catches in Polish Maritime Areas [%]



Źródło: Sotis na podstawie danych CMR, 2025

The distribution of catches per species is presented below (Figure 15). Sprat, flounder and herring are predominant while other species are negligible.

Figure 15 Distribution of catches per species in affected fishing squares in 2024 [% of total catches] [32]



Źródło: Sotis na podstawie danych CMR, 2025

4.4.3 Fishing Effort

Based on data from the CMR, the fishing effort[33] (in days) and efficiency (in kg/day) in 2024 were calculated in each fishing square separately, including the division into vessels below and above 12 m in length. Fishing effort and efficiency in 2024 were also calculated collectively for all 8 fishing squares.

The results of the calculations are presented in the table (Table 4) and figures below (Figures 16-18):

[32] Used Abbrevations: COD, Cod; FLE, Flounder; FPE, Perch; FRO, Roach; HER, Herring; PLE, Plaice; SAL, Atlantic Salmon; SPR, Sprat; TRS, Sea trout; TUR, Turbot.

[33] The amount of time that a fishing vessel or fleet spends actively engaged in fishing activities, typically measured in fishing days.

Table 4 Fishery effort (in days) and efficiency (in kg/days) in affected fishing squares in 2024

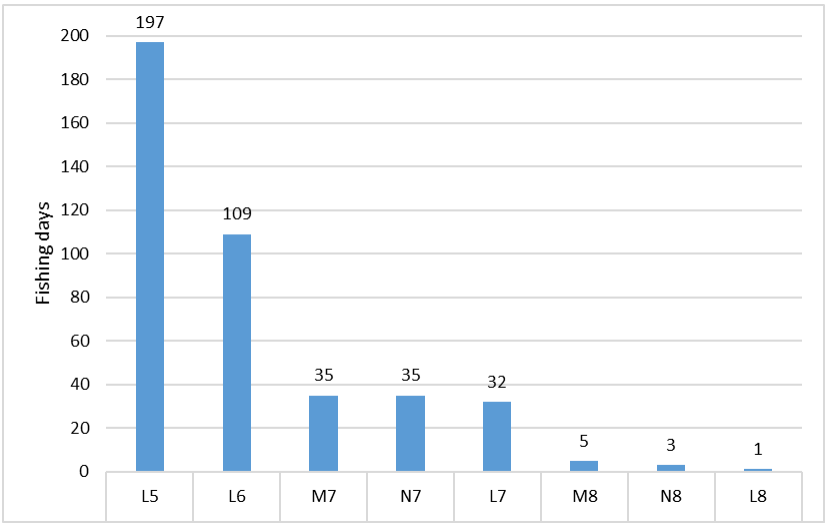
Fishing square	Vessel size	Fishery effort (days)	Catches (kg)	Efficiency (kg/day)
L5	<12 m	191	19548.7	102.3
L5	>12 m	21	51180.0	2437.1
L5	**total in L5**	**197**	**70728.7**	**359.0**
L6	<12 m	95	5576.6	58.7
L6	>12 m	19	28562.0	1503.3
L6	**total in L6**	**109**	**34138.6**	**313.2**
L7	<12 m	28	4670.0	166.8
L7	>12 m	4	14993.0	3748.3
L7	**total in L7**	**32**	**19663.0**	**614.5**
L8	<12 m	0	0.0	0.0
L8	>12 m	1	50.0	50.0
L8	**total in L8**	**1**	**50.0**	**50.0**
M7	<12 m	32	9030.0	282.2
M7	>12 m	6	7670.0	1278.3
M7	**total in M7**	**35**	**16700.0**	**477.1**
M8	<12 m	2	507.0	253.5
M8	>12 m	3	62950.0	20983.3
M8	**total in M8**	**5**	**63457.0**	**12691.4**
N7	<12 m	24	3450.0	143.8
N7	>12 m	14	6780.0	484.3
N7	**total in N7**	**35**	**10230.0**	**292.3**
N8	<12 m	2	300.0	150.0
N8	>12 m	1	20249.0	20249.0
N8	**total in N8**	**3**	**20549.0**	**6849.7**
Total 8 fishing squares		**237**	**235516.25**	**993.7**

Źródło: Sotis na podstawie danych CMR, 2025

For affected fishing squares, the total fishing effort was 237 fishing days, and the fishing efficiency value was 993.7 kg/day.

As can be seen from the figure below, the greatest fishing effort (the greatest number of fishing days) is recorded in squares L5 and L6, located closest to the shore, near port in Ustka. A similar situation occurred in previous years. These are fishing squares where the connection infrastructure common to both wind farms is located.

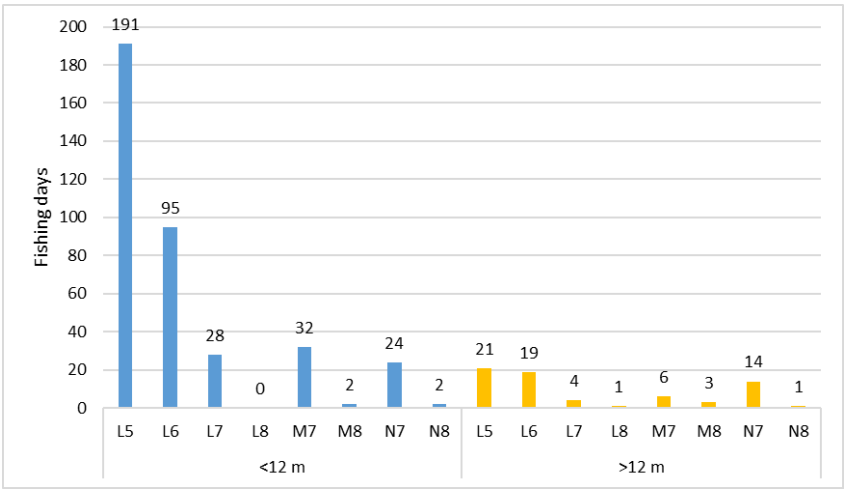
Figure 16 Fishery effort (in days) in affected fishing squares in 2024



Źródło: Sotis na podstawie danych CMR, 2025

In terms of the size of fishing vessels fishing in these areas, small vessels, below 12 m, dominate here. The fishery effort in 2024 in the individual 8 fishing squares, divided by vessel size (below and above 12 m), is presented in the figure below:

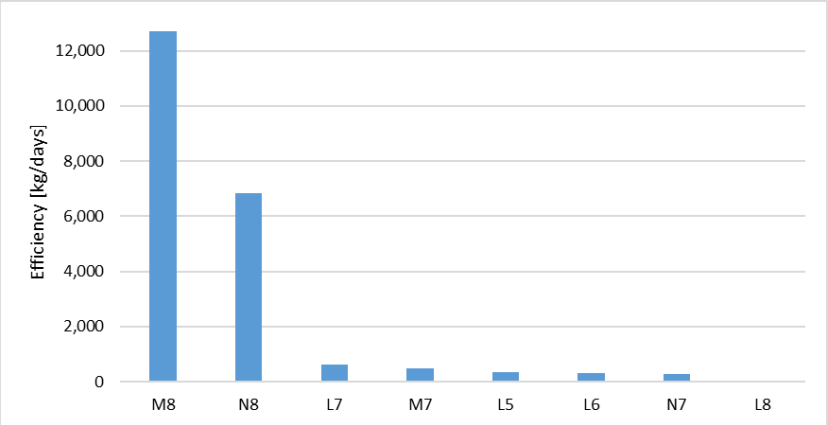
Figure 17 Fishery effort (in days) in affected fishing squares in 2024, by vessel size



Źródło: Sotis na podstawie danych CMR, 2025

The figure below shows the efficiency (kg/day) in individual squares:

Figure 18 Efficiency (in kg/days) in the affected fishing squares in 2024



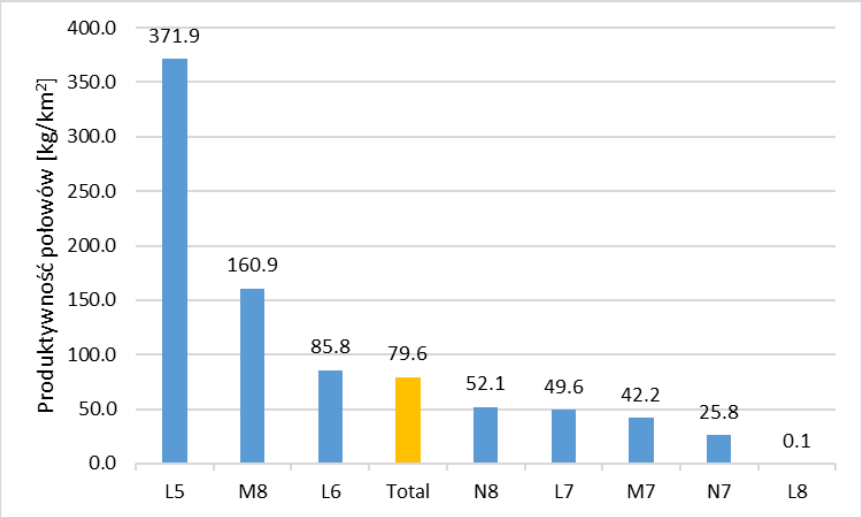
Źródło: Sotis na podstawie danych CMR, 2025

As can be seen from the above analyses, the highest number of fishing days is recorded in L5 and L6, but in squares M8 and N8 a very small number of fishing days was observed with extremely high catches (see Table 4 above).

4.4.4 Fishing Productivity

The figure below shows the fishery productivity (in kg/km²) in the individual fishing squares.

Figure 19 Fishery productivity (kg/km²) in the affected fishing squares in 2024



Źródło: Sotis na podstawie danych CMR i MIR, 2025

In 2024, the total productivity in the 8 analysed fishing squares amounted to 79.6 kg/km². Compared to previous years, this value is clearly decreasing: the LRF cited data from the environmental impact report from 2023[34], which showed that productivity in the analysed

[34] EIA Report for ECI of the MFW Bałtyk II and MFW Bałtyk III, EKO-KONSULT Gdańsk, March 2023

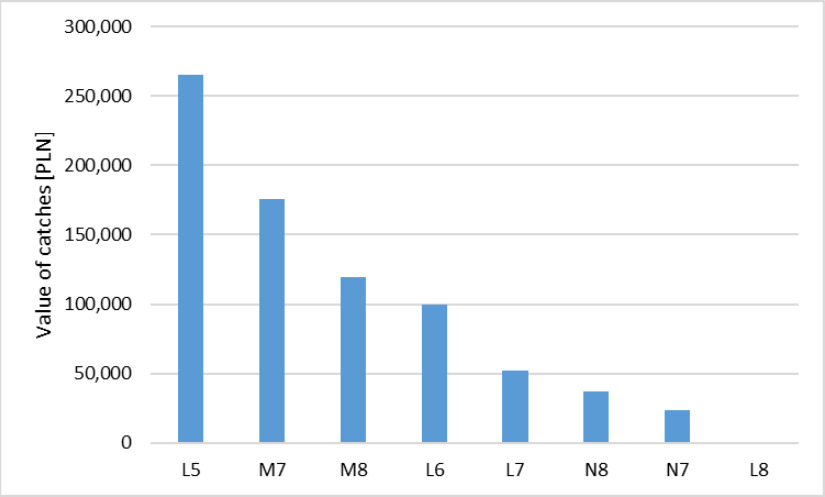
fishing squares in the best year of 2018 was 249 kg/km^2, while in 2021 it was already 177 kg/km^2.

Currently, the highest productivity was recorded in L5 (a slight increase compared to 2021, when this value was 345 kg/km^2) and a practically zero drop in productivity in L8 (where this value in 2021 was 520 kg/km^2). Productivity in square M8 decreased more than twice (in 2021 it was 338 kg/km^2).

The value of fishing productivity in the area of the 8 fishing squares analysed has remained fairly low for years - around 4.76% of the value of fishing productivity for the Polish Maritime Areas (PMA) in 2024.

The figures below show the value of catches by fishing squares (Figure 20) and the value of catches by species of fish caught (Figure 21).

Figure 20 Catch value in 2024 in the affected fishing squares

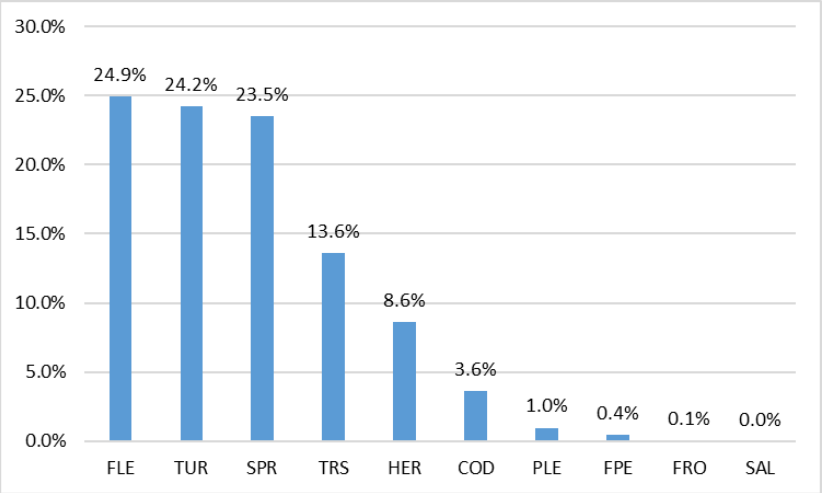


Source: Sotis based on CMR data, 2025

The total value of catches from the analysed fishing squares in 2024 amounted to approximately PLN 771,949 (PLN 0.77 M), which was approximately 0.7% of the value of the total catches in PMA in 2024.

The highest catch values are recorded in squares L5 and M7, they constitute 57% of the catch value in all 8 fishing squares.

Figure 21 Catch value in 2024 by fish species



Source: Sotis based on CMR data, 2025

In terms of species, the most important catch is FLE (flounder), TUR (turbot) and SPR (sprat), whose total catch value constitutes almost ¾ of the value of all catches in the analysed fishing squares.

4.4.5 Potential Impacts to Supply Chains and Commercial Activities Linked to Fisheries

The impact of the Projects on the supply chain and the broader livelihood system was analysed already during the LRF preparation phase (spring 2024). Based on information obtained directly from fishers, as well as on publicly available information, and the team's experience of the state of Polish fisheries, the following is observed:

1) Stricter EU and national fishing regulations in the Baltic Sea, along with a significant reduction in the total allowable catch for key species such as cod, sprat, and salmon, have led to a substantial decrease in the supply of locally caught fish.

2) Some fishers sell fish directly from the cutter to the final consumer at retail prices (directly, by phone, or with delivery).

3) Conversations with fishers and local stakeholders in the ports in spring 2024 revealed that local restaurants generally do not offer fish caught in the Baltic Sea. The vast majority of fish served in seaside restaurants is sourced from imports or from frozen products. Due to the irregularity and unpredictability of local landings, most seaside restaurants rely primarily on less expensive frozen fish rather than fresh, locally caught seafood. This is largely because the consistent supply of freshly caught Baltic fish cannot be guaranteed, whereas imported or frozen fish are readily available and offer price stability.

4) The wind farms are located in areas with low fish stocks (as mentioned earlier: in 2024, total catches in the eight affected fishing squares represented just 0.46% of the total

catch (by weight) and 0.7% of the total catch value recorded for the entire Polish Maritime Area).

Therefore, no significant negative impacts of the Project implementation on supply chains or broader livelihoods are anticipated.

4.4.6 Summary

1. Total catches in 2024 in the 8 affected fishing squares accounted for 0.46% of the total catch in the Polish Maritime Area in weight and 0.7% in value.
2. Sprat, flounder and herring are predominant, with catches of other fish species negligible. In terms of value, flounder, turbot and sprat together constitute 75% of the value of all catches.
3. Fishing productivity is low at only about 5% of fishing productivity for the Polish Maritime Areas as a whole.
4. Squares L5, L6, M7 and M8 have the highest catches.

5 Outcomes of Consultation

5.1 Information and Preliminary Consultation Meetings

Information and preliminary consultation meetings with fishers took place in the 3rd week of March (17-21 March 2025), starting in Kołobrzeg at the Western end of the Projects and then each subsequent day in 5 other towns to the East. The schedule and meeting locations are shown in the figure below. The meetings were led by the Investors representatives together with the Sotis team. Additionally, the port in Rowy was visited by the Sotis team. The Minutes of the Meetings prepared by the Investors constitute Annex 7 to the Survey Report, April 15, 2025.

Potentially affected parties from smaller ports were invited to attend meetings and participate in interviews in the closest larger port, as follows:

- Niechorze, Mrzeżyno, Unieście, Dziwnów and Ustronie Morskie (all invited to Kołobrzeg);
- Darłowo and Jarosławiec two separate meetings on the same date;
- Rowy (invited to Ustka);
- Hel and Świbno (both invited to Władysławowo).

Figure 22 Schedule of information meetings with fishers

Meeting place	Meeting date	Meeting time	Meeting address
Kołobrzeg	17.03.2025	12:00 – 14:00	Headquarters of the Fishing Association Local Action Group "Sea and Parsęta", ul. Szyprów 1 (conference room)
Darłowo	18.03.2025	11.00 - 13.00	Headquarters of the Darłowo Local Fishing Group, ul. Wilków Morskich 15A (Darłówko Zachodnie)
Jarosławiec	18.03.2025	16.00 - 18.00	Hotel Plaza Spa, ul. Bałtycka 16 (conference room)
Ustka	19.03.2025	12.00 - 14.00	Ustka Commune Office, ul. Dunina 24 (conference room)
Łeba	20.03.2025	12.00 - 14.00	Bałtyk Offshore Wind Farm Information Centre, ul. Kościuszki 88
Władysławowo	21.03.2025	12.00 - 14.00	MERK Centre, ul. Portowa 15 (conference room)

Source: Investor, 2025

Per the signed attendance lists, about 135 stakeholders took part in the information meetings. However, in reality, there were some more participants (not everyone signed the attendance list). Detailed information on the number of stakeholders who signed the attendance lists is presented in the Table below (Table 5).

Table 5 Number of participants present at information meetings

Meeting date	Place	Invited ports	Number of participants per attendance lists
17.03.2025	Kołobrzeg	Niechorze, Mrzeżyno, Unieście, Dziwnów, Ustronie Morskie	37
18.03.2025	Darłowo	Jarosławiec	17
18.03.2025	Jarosławiec	-	9
19.03.2025	Ustka	Rowy	23
20.03.2025	Łeba	-	21
21.03.2025	Władysławowo	Hel, Mechelinki, Świbno	28
Total number of participants			135

Source: Investor, 2025

The purpose of these meetings was:

- Presentation of general information on the Bałtyk 2 and Bałtyk 3 projects,
- Presentation of technical conditions and work schedule in the maritime part,
- Presentation of the assumptions of the Livelihood Restoration Plan report, including methodological assumptions for the transitional compensation system,
- Conducting discussions – collecting opinions and conclusions of the fishing community.

5.1.1 Key Outcomes

Key outcomes of the information and consultation meetings are the following:

1. In all locations except Jarosławiec and Łeba, meeting participants took an active part. In Władysławowo fishers mentioned organizing strikes if their demands were not met, involving the media, and class action lawsuits against offshore wind farm developers.
2. Fishers in Łeba and Ustka emphasize that they will feel the effects of the projects the most. In Łeba, this is mainly due to the construction of the base, and over 40% of potentially affected fishing vessels come from Ustka. In these ports, expectations and concerns are greater.
3. Fishers are aware of planned offshore investments, but they do not always distinguish between developers.
4. They stress concerns about the significant negative impact of the investment on the marine environment, in particular the cumulative impact of all offshore wind farm projects and other investments in the Polish part of the Baltic Sea.
5. The key issue discussed during the meetings was compensation, which is expected by fishers not only during construction, but also during the period of operation of wind farms. They also want the calculation methodology to be based on a longer period than in the compensation mechanism proposed by Baltic Power, e.g. 10 years or since 2005.

Another proposal was to provide compensation to all fishers with fishing permits, without reference to fishing squares. Solutions applied in other European countries (Denmark, France) were also mentioned, as well as enabling fishers to share the profits from the operation of the farms.

6. Fishers are interested in employment in the sector, including in the area of safety and security.
7. The fishing community claims that the government and the EU do not support them and are sceptical of Sector Deal proceedings in which few of them participate. They expect cooperation with developers to quickly find solutions that will be good for them, and they count on good communication.

5.2 Information and Consultations Meetings on TCM

On 3 - 4 July 2025, three information and consultation meetings were held with fishers in Łeba, Ustka and Jarosławiec (the most affected ports). Stakeholders were informed of the dates and locations of the meetings through various channels and methods, as was the case in February 2025 (Section 6.1). The purpose of the meetings was to present the proposed transitional compensation mechanism (TCM) and outline the next steps in its implementation.

Meeting locations and number of participants is presented below:

Table 6 Number of participants present at TCM consultation meetings

Date	Location	Project representatives	Stakeholders
3.07.2025	Ustka, Municipality Office	11 persons (8 JVs, 3 Sotis)	approx. 16 persons (local fishers, including vessel owners / operators)
3.07.2025	Łeba, Bałtyk Offshore Wind Farm Information Centre	11 persons (8 JVs, 3 Sotis)	approx. 16 persons (local fishers, including vessel owners / operators
4.07.2025	Jarosławiec, Holiday Home Hotel	10 persons (7 JVs, 3 Sotis)	approx. 18 persons (local fishers, including vessel owners / operators

Source: Investor, meeting attendance lists, 2025

During the meetings, the main assumptions of the Bałtyk 2 and 3 offshore wind farm projects and the construction schedule were presented. The proposed transitional compensation mechanism was discussed in detail, in line with this LRP document. Two approaches were presented for commercial vessels:

- individual approach based on VMS and logbook data from 2018–2024, and
- approach based on ports considered most affected (Jarosławiec, Ustka, Rowy, Łeba) where active fishing vessels are registered.

In addition, the amounts of proposed compensation and the rules for awarding compensation to recreational vessels were presented and discussed.

5.2.1 Key Outcomes

Participants raised questions regarding the payment schedule, eligibility criteria, assessment of fishing activity, and rules related to temporary area closures (landfall area near Ustka port). Comments included concerns about low compensation amounts, unequal treatment of ports (recreational vessels), and calls for simplifying the procedure.

Participants made the following proposals:

- Simplification of eligibility criteria - compensation should be granted to vessels active on the date of payment, without reference to a historical reference period;
- Equal treatment of recreational vessels - it was proposed to pool the allocated compensation amounts for recreational vessels and divide the total equally among vessels from the ports of Darłowo, Ustka, Łeba, and Władysławowo. This proposal was raised during the meeting in Łeba. Representatives from the port of Darłowo who attended the meeting in Jarosławiec also responded positively to the proposal put forward by their colleagues from Łeba. However, there was no support for this proposal in the port of Ustka;
- Development of a standard application/certificate template to be used with the Harbour Master's Office, to facilitate the process of obtaining proof of fishing activity for recreational vessel operators.

Each question was addressed in detail during the meetings. The mechanism for calculating the compensation, the basic principles for granting it and the key provisions of the proposed agreement were also explained.

6 Baseline Information on Affected People and Livelihoods

6.1 Methodology and Limitations

A census and socio-economic survey of fishers potentially affected by the Bałtyk 2 and 3 Projects was conducted in the ports of origin from 17 March to 30 March, 2025 ("cut-off date"). Meetings and surveys at ports of origin took place from 17 to 21 March 2025, but the digital version of the survey was available online for respondents to access and fill in from 27 February to 30 March 2025.

Stakeholders were informed of meeting dates and locations, and of the survey cut-off date through several channels and methods:

- by sending letters on February 27-28, 2025, to the Maritime Offices in Gdynia and Szczecin, to 22 local authorities, including ports in the area of influence, to 19 fishing associations in the area of influence, and to 238 commercial and recreational vessel operators;

- through 9 press releases – prepared and sent to local and industry media on February 28, 2025;

- through telephone contact between the Investor's team and stakeholders to confirm dates, verbally emphasize the importance of the project, and clarify arrangements (exact times and locations) – March 11-14, 2025;

- on the Investor's website: www.baltyk123.pl

A questionnaire was prepared in paper and online form. A total of 116 questionnaires completed by fishers were collected within the stipulated time period, including 5 online and 111 in paper form. The survey was completed voluntarily and anonymously by potentially affected persons, including captains, owners and crew members of both commercial and recreational vessels. The objectives of the survey were the following:

- Determine the level of dependency of affected people on income derived from fishing,
- Identify skills of affected individuals and their willingness to transition to other jobs potentially available in the wind energy sector
- Identify potentially vulnerable people.

Three focus groups (one in Łeba and two in Władysławowo) were also conducted with owners of vessels used for angling. It was not possible to extend this focus group method to representatives of other groups due to their lack of willingness or time to participate in such discussions.

In addition, during the surveys, 19 in-depth individual interviews were conducted in the form of longer conversations with those interested. Their aim was to obtain more detailed

information on the individual needs, opinions, motivations and fishing trends of the interviewees.

All activities carried out during this socio-economic survey and their findings are described in detail the Survey Report, Bałtyk 2 and Bałtyk 3 Offshore Wind Projects, April 15, 2025 (Sotis Advisors).

6.2 Results of Quantitative Investigations

The full analysis of the surveys conducted in the fishing environment is presented in Survey Report. This chapter presents a summary.

6.2.1 Interviewee Demography

1. The study involved 116 individuals, including 109 men (94%) and 5 women (4%), while 2 persons did not provide their gender in the survey.
2. The largest group is people of working age; 23% of surveyed men are over 65 years of age.
3. Among respondents who answered the question (111 persons) about their education, 19% have higher education, while the vast majority have secondary (43%) or vocational-technical education (33%).
4. In relation to specific skills or experience of respondents, over half (55%) of those who responded indicated first skills or experience as mechanics, then piloting at sea and experience in fishing. In addition, the most frequently declared skills or experience were: welding, skipper skills (different classes), experience in security, driving heavy vehicles, and health and safety.

6.2.2 Vessel Categorization

1. The survey identified 96 fishing vessels, as detailed in the table below, of which 2/3 were commercial vessels and almost 1/3 were recreational vessels.

Table 7 Types of vessels in survey area (survey respondents only)

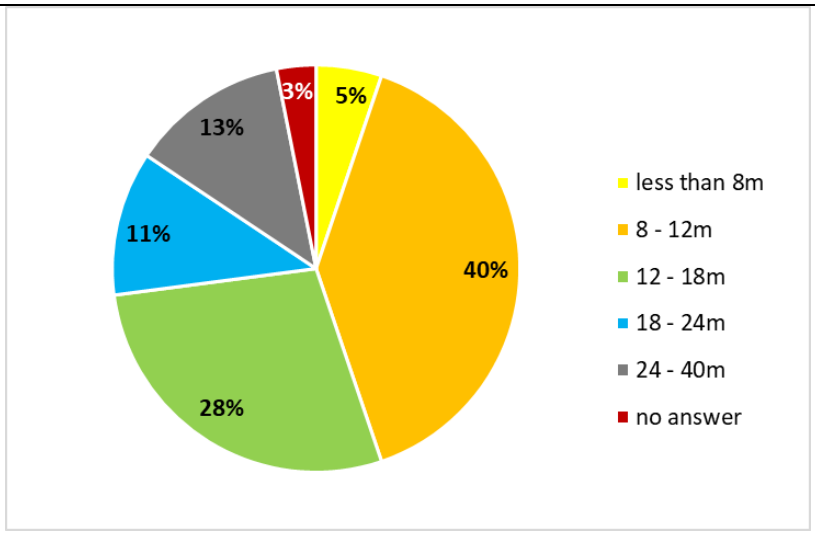
Type of vessels	Number of vessels	% of total amount of vessels
Commercial fishing vessels	63	66 %
Recreational fishing vessels	26	27 %
Commercial yacht	3	3 %
No data	4	4 %
Total	96	100 %

Source: Sotis, 2025

2. Among the 96 vessels identified by the respondents, small vessels are largely predominant. Details are presented in the table and in the figure below.

Table 8 Number of vessels by length in survey area

Length of vessels	Number of vessels
Less than 8 m	5
8 – 12 m	38
12 – 18 m	27
18 – 24 m	11
24 – 40 m	12
No answer	3
Total	96



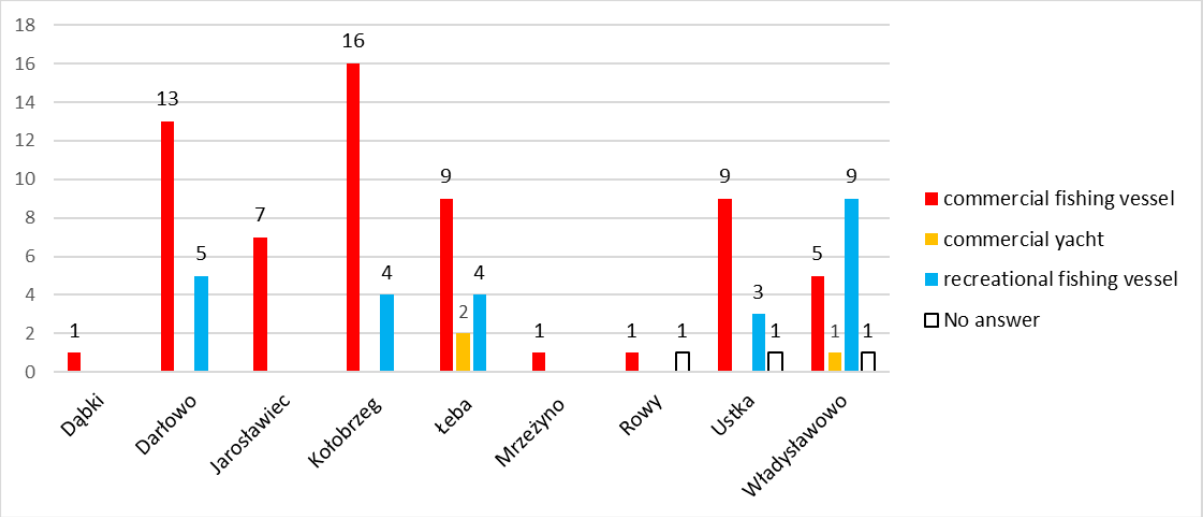
Source: Sotis, 2025

3. Of the total number of 96 fishing vessels, 9 operate exclusively within the 12 nautical mile zone and these are small vessels less than 12 m in length (5 of them come from Jarosławiec).

6.2.3 Ports of Mooring

1. The largest number of commercial fishing vessels moor in Kolobrzeg (26% of the 62 commercial vessels), Darłowo (21%), Ustka and Leba (15% each).
2. Recreational vessels are mainly stationed in Władysławowo (36% of the total of 28 recreational vessels and commercial yachts), Leba (21%) and Darłowo (18%).

Figure 23 Number of units moored in individual ports, by vessel type



Source: Sotis, 2025

6.2.4 Fishing Squares and Fishing Techniques

1. On average, 69% of the 79 respondents conduct fishing in the 8 fishing squares where the Projects will be located (36 of the 116 respondents did not answer this question, 1 vessel was not active).
2. At the same time, over 58% of this group of 79 respondents declare fishing also in other fishing squares.
3. Information on the types of fishing gear used by the surveyed fishers is provided in the table and figure below.

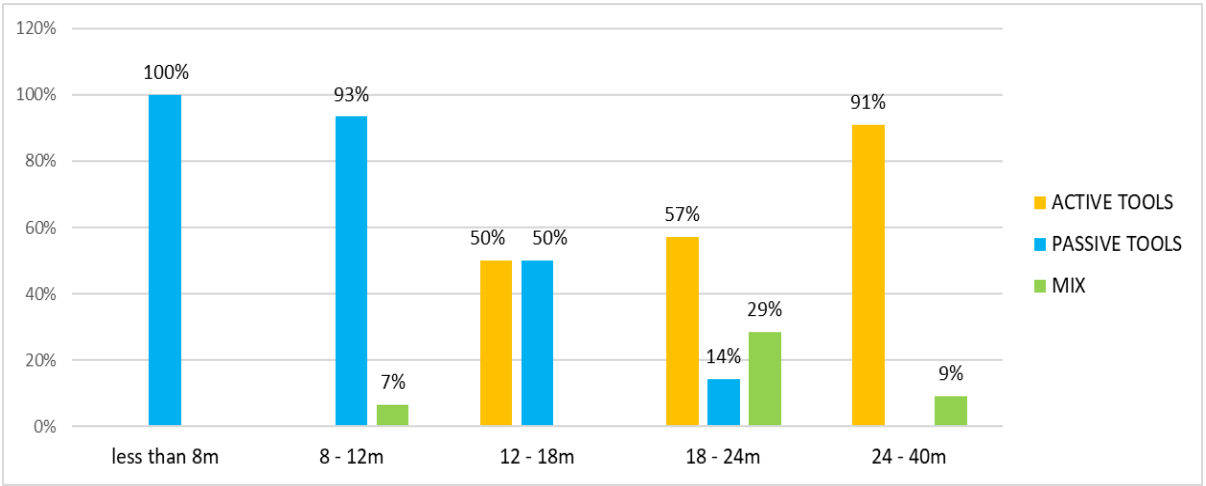
Table 9 Groups of fishing gears

Group of fishing gears	Types of fishing gears
ACTIVE towed gear	OTB - Bottom otter trawl OTM - Midwater otter trawl PTB - Bottom pairs trawls PTM – Pelagic pair trawls
PASSIVE static gear	GND - Drift gillnets GNS - Set (anchored) gillnets LLD - Longlines (drifting) LLS - Set longlines
MIX	Mix of active and passive tools

Source: Sotis, 2025

4. On small vessels (less than 12 m in length) passive gears dominate, while on larger vessels (over 18 m in length) active gears dominate.

Figure 24 Percentage of fishing gear types used on commercial vessels by vessel size



Source: Sotis, 2025

5. The responses obtained from 61 respondents show that over 62% of all gear types used is passive (GND, GNS, LLD, LLS).

6. In the coastal zone, less than 12 nautical miles from the coast, the only type of equipment used is passive gear.

6.2.5 Interviewee's Household

1. 68% of 116 interviewees are shipowners, 5% are vessel salaried captains, and 21% are other crew (while 5% did not answer this question).
2. The majority of respondents are in two- to four-person households, while single-person households make up less than 9% (while 18% did not answer the question).
3. Over half of the households declare up to 2 dependants (while 30 % did not answer the question).
4. Only around 15% of the 116 households have at least one elderly, disabled or chronically ill person (while 24% did not answer the question).
5. Of the 116 respondents, only one indicated that their household uses social assistance or welfare, but 22 persons did not answer this question (19% of respondents).
6. The vast majority of respondents (64%) did not answer the question on what forms of assistance they would expect from an investor. Others indicated financial support (40 people), one person indicated training and another one indicated employment.

6.2.6 Livelihood

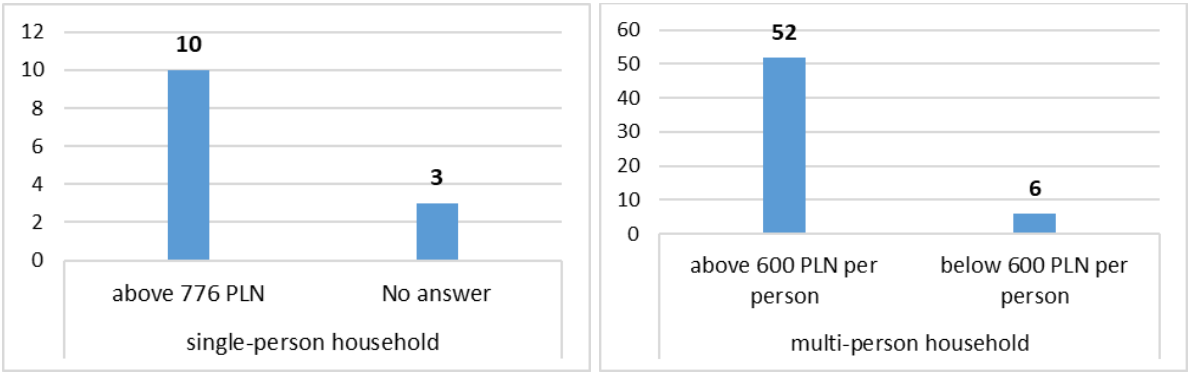
1. Over 72% of respondents indicate commercial or recreational fishing as the main source of income in the household (while almost 9.5% of the group did not answer this question). For almost 9% of respondents waged work is the main source of income, and for almost 7% pension benefits.
2. The second source of income is indicated as small business (17% of respondents), waged work (13%), and pension and retirement benefits (10%). 39% of the group did not indicated second source of the incomes.
3. Subsidies (EU or government) were indicated as a source of income by 3 persons.
4. Unemployed people were identified in the households of 19% of respondents (16% of the interviewees did not answer this question). Most often one household member is unemployed (in 20 households) and only in 2 households - 2 persons.

6.2.7 Household Budget

1. Currently, the Poland poverty threshold is PLN 776 per month per capita for single-person households and PLN 600 per month per capita for multi-person households.

2. Single-person households constitute over 11% of the surveyed group of 116 fishers, multi-person households – almost 78%, 11% of the interviewed group did not answer this question.
3. 10 out of 13 respondents who described their household as single-person provided answers about their monthly budget. They all indicated a household budget exceeding the threshold of PLN 776 per month per capita.
4. For the 90 multi-person households, 58 people answered the question about their monthly budget, 6 of whom declared a monthly budget lower than PLN 600 per capita (i.e. below the poverty threshold). This is presented in the figures below.

Figure 25 Monthly household budget

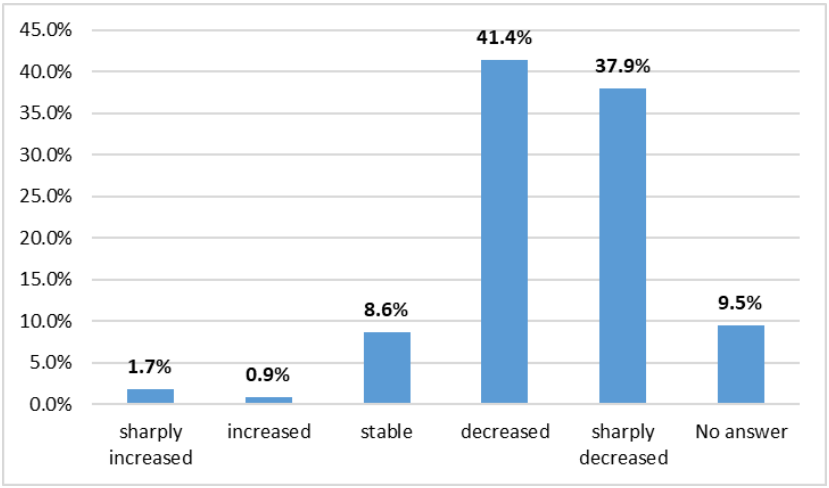


Source: Sotis, 2025

6.2.8 Evolution of Fishing Income

1. Income from fishing (commercial and recreational) activity for over 79% of interviewed fishers decreased or sharply decreased in the last 5 years, as shown in the figure below:

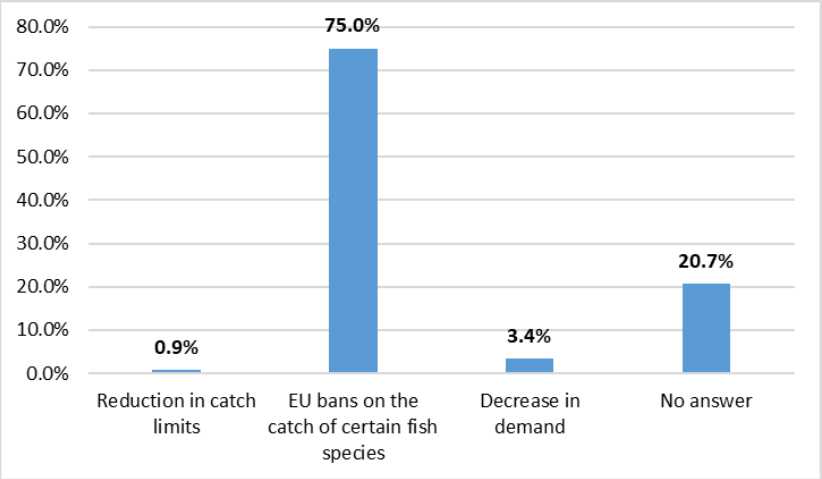
Figure 26 Incomes from fishing activity in the last 5 years



Source: Sotis, 2025

2. The vast majority (75% of 116 respondents) cited EU restrictions on fishing for certain species as the reason for changes in their income from fishing activities (commercial or recreational) in the last 5 years.

Figure 27 Indicated reasons for the decrease in incomes



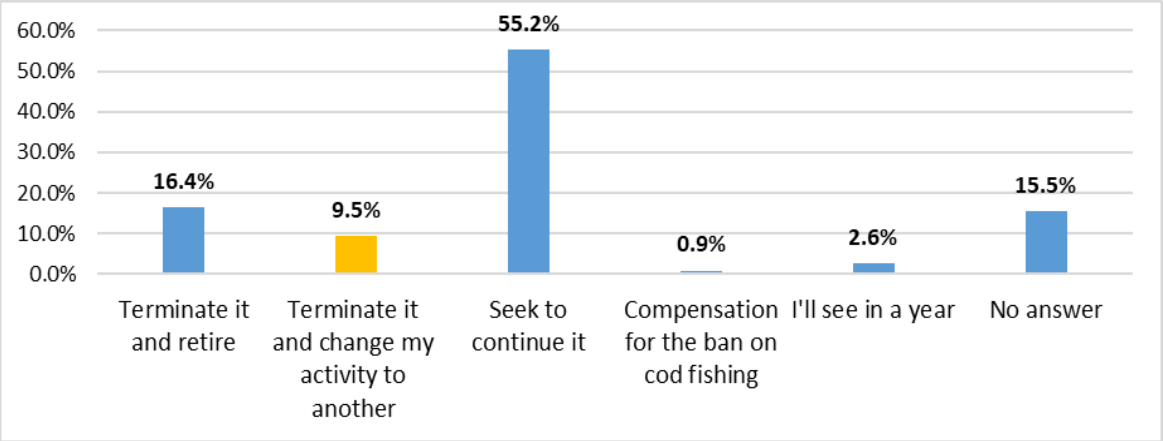
Source: Sotis, 2025

3. Among the 92 people who declared a decrease or a drastic decrease in income from commercial and recreational fishing in the last 5 years, 57 people (62%) were not able to offset these losses in the budget by another source of income, while 14 were able to do this (15%), such as through tourist rentals or other marine activities.

6.2.9 Plans and Aspirations for the Future

1. Of the entire group of 116 people, only 9.5% (11 people) declared their desire to end their fishing activities and change their professional activity (see the figure below). This small group is considering working in a small company, a salaried job, other maritime activities or work in tourism.
2. More than 55% want to continue working in their current occupation as a fisherman.

Figure 28 Plans and aspiration of fishers for the next 5 years



Source: Sotis, 2025

3. Over 53% of respondents believe that the development of offshore wind farms will affect their ability to continue their fishing activities. The most frequently mentioned reasons include: limited fishing areas and access to them.

6.3 Results of Qualitative Investigations

Focus Group investigations were conducted in 3 groups of owners of recreational (angling) vessels. In addition, 19 in-depth individual interviews were conducted amongst various respondents. Key findings from these discussions and interviews follow:

1. The EU ban on cod fishing introduced dramatic changes to the commercial and recreational fishing operations in the Project area. Other issues having arisen in recent years include: smaller fish stock and smaller catches compared to previous years, the activity of large cutters, problems with seals, and access difficulties to and from ports (e.g. in Łeba).
2. For the above reasons, recreational fishing is almost inactive nowadays, and in the case of commercial fishing, serious changes are taking place.
3. Fishers are taking various actions to cope with the difficult situation since 2020. Some of them are able to adapt to new, more difficult conditions, e.g. by changing fishing grounds, catching fish species that are not currently prohibited, adjusting boat parameters to more efficient ones. Others are changing the nature of maritime activities and, for example, using their vessels for other purposes (e.g. the recreational vessels function as ferries, are used for marine research, organizing weddings at sea, etc.). Some fishers directly sell fish from the cutter to the final consumer at retail prices (directly, by phone, by delivery).
4. Taking advantage of support offered by European funds, some fishers have abandoned their profession in recent years, and some ship owners have scrapped their

commercial vessels. However, unused, decaying, and even partially sunken boats are still moored in ports.

5. In the case of terminating maritime activities, the main activity undertaken is renting apartments out. Some sell their vessel for the fishing quotas that are attached to it, which causes this vessel to stand idle and deteriorate in the port while other vessels catch its quotas.
6. Respondents see the possibility of using their fishing vessels (including recreational vessels) for the needs of the OWF. Another alternative for some is the possibility to scrap recreational vessels and continue activities other than fishing. Government aid related to the possibility of scrapping recreational vessels, currently not an available option, is expected.
7. When it comes to the construction and operations of OWF, respondents express concerns about limited space in ports, threats to the marine environment, the size of the exclusion zones around the farms, difficulties with navigation between wind farms or reaching fishing grounds, and the cumulative effects of the existence of several offshore wind farms in the same area.
8. Concerns are also raised by members of the Port Authority in Ustka related to monitoring and observing prohibitions on sailing into the closed coastal zone between the western breakwater and the military training ground. They indicated tourists in small motorboats and on scooters as the main threat, as there is no radio communication with them.
9. With regards to OWF investors, the surveyed fishers expect financial compensation, clarification of details regarding safe distances from OWF and being able to use sailing corridors between individual wind farms, as well as a reduction in technical requirements for surveillance vessels so they can apply with their own vessels and be employed as subcontractors.
10. Fishers often do not have knowledge of the exact location of wind farms, nor of individual projects and developers. Their negative attitude is more towards the sector in general (offshore wind industry) than towards individual developers.
11. The fishing community is discouraged by the talks so far in Group 6.3 of the Sectoral Agreement.

6.4 Vulnerable Groups and Potential Gender Impacts

Based on the information and data collected during the preparation of the LRF (in 2024) and the LRP (in 2025), including the results of surveys, direct and repeated contacts with fishers and representatives of local communities, as well as on the experience of Polish

fisheries, no groups specifically vulnerable to the effects of the Projects implementation have been identified in the Projects' impact area.
Of those employed in the fishing industry, about a quarter are over 65 years of age, who generally receive pensions and supplement their income by working at sea, with the vast majority of them being vessel owners or operators. No older individuals with disabilities or chronic illnesses have been identified who continue to work at sea.

Similarly, no disproportionate gender effects were observed in the Projects' impact area. Due to its specific nature, employment in the fishing industry is dominated by men (in surveys, 94% were men, with only 5 women identified as working in this sector).

However, the situation of potentially vulnerable groups during the implementation of the Projects will be monitored per provisions in Chapter 10 and, if necessary, appropriate corrective actions will be taken.

6.5 Summary

1. The survey group included mostly men, mainly of working age, with secondary or vocational-technical education, who, in addition to experience in fishing, also have skills and experience in mechanics and piloting at sea. They were mainly owners of fishing vessels (in 37 cases even more than one vessel) or crew members working on fishing vessels.
2. The survey identified 96 fishing vessels, of which two thirds were commercial fishing vessels and one third were recreational vessels. This group was dominated by small vessels, under 12m in length, with a significant group also comprising vessels between 12 and 18m.
3. Commercial vessels moor mainly in the ports of Kołobrzeg, Darłowo, Ustka and Łeba. Recreational vessels moor mainly in Władysławowo, Łeba and Darłowo
4. Most of the respondents conduct fishing activities in 8 fishing squares, as well as in other fishing squares. The main fishing gears used by the respondents are passive gears (GND, GNS, LLD, LLS).
5. The respondents' households are mainly two- to four-person. About half of them have 1-2 dependents. In 17 households there were elderly people (over 75 years old), disabled or chronically ill people. Only in one case did the respondent indicate that his household uses social assistance or social welfare. The vast majority of respondents own their place of residence.
6. The main source of income for the vast majority of respondents is fishing. As many as 39% of respondents do not declare having other, additional sources of income, which shows the strong dependence of households on income from fishing. The rest most

often declared as additional sources of income: running a small business, waged work, retirement or disability pension, tourism activity, including renting apartments.

7. Unemployed persons were identified in 22 households, including in 2 cases – 2 persons in the household.
8. In 6 households (multi-person) the monthly budget is lower than PLN 600 per capita (i.e. below the poverty threshold in Poland). In 3 of these 6 households there is at least 1 unemployed person.
9. The vast majority of respondents have observed a decline in income from fishing activities in the last 5 years, indicating EU restrictions as the main source of this situation. Most of these people were not able to offset these losses in the budget by another source of income.
10. The majority of respondents want to stay in the profession and continue fishing activities.
11. Respondents see the possibility of using their fishing vessels (including recreational vessels) for the needs of the OWF. They also expect technical requirements for surveillance vessels to be reduced, allowing them to apply with their own vessels and be hired as subcontractors.
12. Fishers are aware of the possibility of using EU funds – many have used them, others are considering it. However, owners of recreational vessels cannot use EU funds, which has long been a point of contention in the fishing community. Statutory solutions in this area are urgently awaited.
13. The off-shore wind farms are seen as a potential source of restrictions on fishing sites and impediments to access to fishing grounds, threats to the marine environment, and cumulative impacts with other offshore farms.
14. The fishers expect financial compensation from the OWF investors, clarification of details regarding safe distances from the OWFs and the possibility of navigation between them.
15. The fishing community is discouraged by the talks so far in Group 6.3 of the Sectoral Agreement.

7 Transitional Compensation Mechanism (TCM)

7.1 Overview of Mitigation Strategy

Livelihood impacts will be mitigated using two key instruments:

- Transitional compensation is meant to offset potential livelihood losses experienced by affected fishers during the transition period until the Government of Poland provides for a final compensation mechanism for affected fishers.
- Long-term livelihood restoration measures are meant to restore or enhance affected livelihoods in a longer-term perspective.

7.2 An Existing Blueprint for the Project TCM: the Baltic Power Mechanism

Another developer working in the same area, Baltic Power, has already developed, and is currently implementing a similar mechanism to offset transitional fishing losses. Several of the ports affected by the Project are also affected by the Baltic Power, which have presented and submitted for consultation their own TCM to fishers roughly a year ago. In order to maintain consistency in the rules existing on the Polish market, the Project has decided to base its TCM on the same general principles (eligibility and calculation formula) as those adopted by Baltic Power. It is worth noting that the Baltic Power project is also involving international finance institutions and that these IFIs have deemed the Baltic Power TCM acceptable.

7.3 Project TCM Objectives and Key Principles

7.3.1 Objectives and Duration of the TCM

At the stage of preparatory work for the Projects, there were no national regulations on compensation. The Government of Poland is currently considering drafting regulations on compensation; however, such legal provisions will likely not to be ready before the commencement of the Projects' construction. The TCM is therefore meant to offset potential losses to fishers in the transition period until a Compensation Mechanism is established and national regulations are implemented.

As a result, the TCM will roughly correspond to the Project Construction Period, while the Permanent Compensation Mechanism would address the Operations Period, hence the "transitional" character of the TCM.

7.3.2 Eligibility Principles

There are generally two eligibility options for the TCM:

- Either consider eligibility at vessel level: the vessel is the affected entity upon which eligibility is based;

- Or at individual fisher level: vessel owners, vessel operators and vessel employees are considered separately, with transitional compensation designed to address the loss of each of these categories.

It has been determined that eligibility to the Project TCM would be at vessel level, and that vessel operators would be the eligible entities. There are several reasons for this:

- Vessel operators are the enterprises that bear the cost of maintaining the vessel, employ the crew, and actually fish. They are the ones that experience losses of livelihoods;
- The asset itself (the integrity of the vessel) is not affected, therefore non-operator owners are not affected and will not be eligible to the TCM;
- Data on vessel employees are difficult to gather and verify and can be affected by speculative claims;
- This eligibility principle is in line with the Baltic Power TCM, which was successfully adopted and is being implemented.

Both commercial and recreational vessels are experiencing losses, therefore both categories of vessels will be eligible to the TCM. However, because of the different nature of their earnings, different compensation calculation options will have to be considered for the two categories.

7.3.3 Potential TCM Eligibility Options

Within the broad principle outlined above (eligibility at vessel level), three TCM eligibility options have been considered and compared:

- Option 1: eligibility based on (a) being currently active (holding a fishing license) and (b) having fished at project sites in the period 2018-2024;
- Option 2: eligibility based on (a) being currently active (holding a fishing license) and (b) being registered in any of the 11 ports identified as affected;
- Option 3: eligibility based on either:
    - (a) being currently active (holding a fishing license) and (b) having fished at project sites in 2018-2024 (same as Option 1);
    - Or (a) being currently active (holding a fishing license) and b) being registered in the most affected ports of Jarosławiec, Ustka, Rowy and Łeba.

Each option was assessed in terms of practicability and potential risks, in order to identify the most appropriate and operationally feasible approach for implementing the TCM.
A system proposed by some fishers, providing compensation payments to all entities regardless of their fishing history, was also examined (Option 2). However, it was determined that such an approach would be unfair to those who are actually experiencing losses as a result of the Projects' implementation. Furthermore, this option was found to lack justification based on the available catch data from the Projects areas.

Option 3, which includes fishing-active vessels registered in one of the ports of Jarosławiec, Ustka, Rowy, or Łeba, was developed as a result of consultations with fishers held in March 2025.

7.4 Outcome of Consultations on the TCM

Option 1 raised concerns from small vessel operators, who would be excluded while they are still active and are affected by near-shore works, particularly the offshore export corridor. Option 2 is supported in some of the affected ports but could be seen as unfair by those who are actually active as they would get the same as currently inactive operators. Option 3 allows smaller vessels to be compensated. After detailed analyses, Option 3 was selected for implementation for projects Bałtyk 2 and Bałtyk 3.

In order to meet the needs of fishers and considering that the Bałtyk 2 and Bałtyk 3 projects are often treated by stakeholders as one project (similar work schedules), the JV decided to implement a unified compensation system, treating both projects as one integrated project.

7.5 Eligibility Verification

Entities eligible for compensation include:

- Operators of commercial fishing vessels who reported catches in the marine areas covered by the Project between 2018 and 2024, as well as operators of commercial fishing vessels registered in one of the four following ports: Jarosławiec, Ustka, Rowy, and Łeba;
- Operators of angling (recreational) vessels who were based in the target ports between 2018 and 2024 and conducted recreational and sport fishing trips. These ports are: Darłowo, Ustka, Łeba, and Władysławowo. The ports were identified based on MIR data and, additionally, survey results, analysis of recreational angling offers available online and a detailed GIS-based analysis.

The verification of eligibility for different categories of vessels will be carried out according to the following rules:

- Commercial fishing vessels fishing in squares L5, L6, L7, L8, M7, M8, N7, N8 (vessels up to 12 m) or fishing in the affected area (sites, cable routes + 500 m buffer zone, vessels above 12 m)), as well as commercial fishing vessels registered in one of the four ports directly affected by the investment: Jarosławiec, Ustka, Rowy, and Łeba: the vessels must be active, meaning they are listed in the official register of fishing vessels and hold both a valid fishing license and a special fishing permit for the relevant calendar year. Verification will be based on data from official databases for the years 2018–2024 and the current vessel registry.
- Angling vessels operating from the ports of Darłowo, Ustka, Łeba, and Władysławowo, provided it can be confirmed that the vessel conducted sea fishing trips with anglers on board between 2018 and 2024 and is currently seaworthy.

The operator will be required to provide a certificate issued by the maritime administration authority (harbour master's office), confirming that the vessel carried out fishing trips. During the application review stage, additional verification of the submitted information will be performed using official data from harbour master offices and port authorities.

In accordance with the adopted eligibility criteria, a detailed application verification checklist was prepared (Annex 5).

7.6 Potentially Unregistered Vessels

Lender standards require that potentially unregistered parties should be considered. In Poland, all fishing vessels used for commercial activities must be registered in the fishing vessel register, which is maintained by the Ministry responsible for fisheries based on EU regulations and the Act on Marine Fisheries of December 19, 2014. This requirement applies to both sea-going vessels and smaller boats, regardless of size and engine power, if they are used for commercial fishing. Only registered vessels are legally permitted to conduct fishing activities in Polish marine waters.

The use of vessels not registered in the fishing vessel register for fishing purposes is illegal, and control authorities regularly verify registration status. Therefore, it is not anticipated that illegal commercial fishing by unregistered vessels will occur and it would be impossible for the Projects to consider such vessels. Eligibility criteria for compensation therefore include the obligation to be registered in the marine vessel register on the date of submitting a TCM compensation claim.

7.7 TCM Compensation Calculation

7.7.1 Overview

The transitional compensation methodology was developed by Sotis Advisors with the support of the National Marine Fisheries Research Institute (MIR). Compensation includes two components:

- Compensation for lost income (lost catches for commercial vessels and lost fishing trips for recreational vessels);
- Additional costs (so-called "operating costs") resulting from the need to use alternative routes to fishing grounds, covering additional fuel costs, longer crew working hours, and the necessity to change fishing grounds, depending on the vessel length.

7.7.2 Compensation for Lost Income

The calculation of compensation is based on official data from the Fisheries Monitoring Centre regarding the best fish catches from 2018 to 2024, which serve as reference years

for each commercial vessel length category. The data on the weight of catches by fish species in the affected fishing squares or affected area were multiplied by the average prices of individual fish species for 2024 to obtain the value of catches.

The obtained income values in 2024 prices are then analysed in order to select the maximum value of annual catches. The calculations included units that were entered in the register of fishing vessels as of April 30, 2025. The top-performing vessels from 2018–2024 are selected as follows:

- for vessels up to 12 m in length (without a VMS system), data from catch reports are used;
- for vessels over 12 m (with a VMS system), data from the VMS are applied.

From the obtained values, the maximum in each length class was selected. The table below shows these maximum values that serve as the basis for the first element of TCM compensation for the five affected Project sites (see Figure 2):

Table 10 Maximum Value of Catches in the Period 2018-2024 in the Five Project Sites

Site	Vessel length class [m]	Maximum value of catches (PLN/year)	Port of registration	Year
MFW Bałtyk II – OWF	8-12	42 252	Ustka	2018
	12-18	5 345	Kołobrzeg	2022
	18-24	3 693	Ustka	2023
	24-40	3 022	Hel	2019
MFW Bałtyk II – Cable	8-12	2 743	Ustka	2019
	12-18	372	Kołobrzeg	2018
	18-24	1 361	Kołobrzeg	2018
MFW Bałtyk III – OWF	8-12	16 989	Dziwnów	2018
	12-18	11 803	Ustka	2020
	18-24	1 776	Łeba	2018
MFW Bałtyk III – Cable	8-12	8 023	Ustka	2018
	12-18	14 232	Ustka	2024
	18-24	5 435	Ustka	2018
MFW Bałtyk II & III – Export cable	0-8	2 690	Ustka	2020
	8-12	12 271	Ustka	2018
	12-18	11 198	Ustka	2020
	18-24	9 395	Ustka	2018
	24-40	5 692	Władysławowo	2019

Source: Sotis (MIR), 2025

7.7.3 Compensation for Additional Expenses

7.7.3.1 Overview

An additional amount is then added to account for operational disruptions as follows:

- Additional fuel consumption to reach new fishing grounds;
- Additional vessel wear due to the longer fishing trips;
- Longer crew working hours;
- Lost fishing income as a result of a longer trip to other fishing grounds.

The calculation formula for each component is based on the Baltic Power transitional compensation mechanism, with an increase by 10% to account for inflation and adapted to the disruptions caused by the two offshore wind farms, but common along the export cable route.

Compensation to commercial vessels operators will be paid in tranches for each year throughout the construction period of the OWF.

The verification of eligibility for compensation will not involve any additional costs for vessels' owners, except for negligible expenses related to submitting the application to the Project (eg. sending a letter with the application for compensation).

7.7.3.2 Increase in Fuel Cost

Higher fuel consumption cost is the product of:

- the average fuel consumption in kg of fuel per kW of engine power per hour
- the vessel's engine power in kW
- the price of fuel in PLN per kg
- the additional travel time to the fishing ground.

The fuel consumption of a low-speed or medium-speed ship engine according to literature being on average 0.185 kg/kWh at an average speed of 6 knots, the calculation formula reads as follows:

$$R_f = 0.185 * \frac{d}{11} * p * M * trips$$

With:

- Rf - compensation for additional fuel costs in PLN
- 0.185 - average fuel consumption in kg per kW of vessel engine power
- 11 - average speed of the vessel to the fishing ground in km/h
- d - extended route to the fishing ground in kilometres
- p - price of a kilogram of fuel in PLN
- M - vessel engine power in kW

7.7.3.3 Increased Vessel Wear and Tear

The cost of increased wear and tear of the vessel resulting from its additional operating time is calculated on the basis of the extended operating time of the vessel, the hourly depreciation rate and the current value of the vessel. The calculation formula reads as follows:

$$Rz = W*0.00000799*t* trips$$

With:

- Rz - compensation for increased wear of the fishing vessel
- W - value of the fishing vessel
- t - extended time of arrival and return from the fishing ground
- (0.00000799 = annual depreciation rate of 7% divided by the number of hours in the year - 8760 h)

7.7.3.4 Increased Crew Work Time

The cost of increased crew work time is based on the calculation of additional salary costs, the minimum pay per hour, the average number of crew for each category of length, and the extended time needed to reach new fishing grounds. The calculation formula reads as follows:

$$Rw = S*t *Z *trips$$

With:

- Rw - compensation for additional wage costs resulting from extended time of arrival and return from the fishing grounds
- S - minimum wage rate per hour of work
- t - extended time of arrival and return from the fishing grounds
- Z - number of crew members (2 for 0-8m length, 3 for 8-12, 4 for 12-18, 5 for 18-24 and 6 for more than 24m.

7.7.3.5 Lost Income as a Result of Longer Trips While not Fishing

This component of compensation is meant to compensate for the lost fishing income that the vessel could have earned had it been fishing during the longer travelling time to alternative fishing grounds. The calculation formula reads as follows:

$$Ru=\frac{I}{t_c} * t_d*trips$$

With:

- Ru – compensation for lost income due to extended travel to the fishing ground;

- I – catches of the vessel in a given year (catches in 2023 at 2024 prices);
- tc – total fishing time spent at sea in a given year (2023).
- td – extended time to reach the fishing ground

7.7.4 Compensation amounts

The table below presents the values of compensation amounts per year for individual commercial vessels that have a track record of catches in the affected area, broken down by vessel size, calculated based on two components: loss of income and operating costs.

Table 11 Compensation amounts per year for individual commercial vessels

Vessel length [m]	B2&B3 catches [PLN]	Operating costs [PLN]	Total [PLN]
0-7,99	2 700	9 900	12 600
8-11,99	82 275	12 375	94 650
12-17,99	42 950	24 750	67 700
18-23,99	21 660	37 140	58 800
24-39,99	8 700	49 500	58 200

Source: Sotis, 2025

The table below presents the compensation amounts for fishing vessels from 4 ports (Jarosławiec, Ustka, Rowy, and Łeba) that do not have documented catches in the affected area:

Table 12 Compensation amounts per year for fishing vessels from 4 ports

Vessel length [m]	B2&B3 cable catches [PLN]	Operating costs [PLN]	Total [PLN]
0-7,99	2 700	4 950	7 650
8-11,99	12 270	6 230	18 500
12-17,99	11 225	12 375	23 600
18-23,99	9 440	18 560	28 000
24-39,99	5 650	24 750	30 400

Source: Sotis, 2025

7.7.5 Recreational Vessels

Compensation for recreational (angling) vessels was calculated based on the OWF Baltic Power benchmark (35.000,00 pln netto/vessel), increased by 10% due to inflation, which gives a base compensation amount of PLN 38.500.

This compensation amount is based on estimated income from angling operations in 2018 and 2019 (according to the Baltic Power TCM).

Operators of recreational vessels will be entitled to a one-time compensation payment.

The table below presents compensation amounts for recreational vessels from the 4 ports indicated earlier:

Table 13 Compensation amounts for recreational vessels (one-off)

Port	Payment per vessel B2&B3 [PLN]
Darłowo	38 500
Ustka	57 750
Łeba	57 750
Władysławowo	38 500

Source: Sotis, 2025

In the case of vessels sailing from the port in Darłowo, none of the verification methods used confirmed that they operate within the area of any of the offshore wind farms (OWFs); however, they do operate within the area of the shared export cable route.

In the case of recreational vessels sailing from the port in Władysławowo - the amount will be paid in connection with the real possibility of carrying out fishing trips only in the area of Bałtyk 3.

In the case of recreational vessels from the ports of Ustka and Leba, which could potentially carry out fishing trips in the areas of both OWFs, the amount will be PLN 57.750, i.e. 1.5 times the value calculated for a single project, due to the fact that some of the constraints and exclusions of marine areas are shared by both projects Bałtyk 2 and Bałtyk 3 (common export cable route).

7.7.6 Tax and Phasing

The compensation amounts provided are net amounts, exclusive of VAT. Where applicable, VAT will be added to the compensation amount.

For the construction phase of the Project, four compensation periods will be established:

- Period 1: from 15 March to the end of December 2025 (the amount of compensation will be reduced accordingly – to 9.5 months – in relation to the amounts shown in the tables above for commercial vessels);
- Period 2: covering the year 2026 (full compensation shown in the tables above for commercial fishing vessels);
- Period 3: covering the year 2027 (full compensation shown in the tables above for commercial fishing vessels);
- Period 4: from January to the end of April 2028 (until the completion of construction of Bałtyk 3). The amount of compensation will be reduced accordingly – to 4 months – in relation to the amounts shown in the tables above for commercial vessels.

According to the current schedule, the total construction period is from 15 March 2025 to the end of April 2028, with the construction of Bałtyk 2 to be completed by the end of September 2027. Thus, compensation for the construction period for Bałtyk 2 will end in September 2027, and then compensation for the operation phase will be paid (not included in this LRP). In the case of Bałtyk 3, compensation for the construction period will continue to be paid until April 2028.

These differences in the implementation schedule for Bałtyk 2 and Bałtyk 3 have been included in the calculations of the estimated compensation amounts for each year of the construction phase.

Considering the risk of construction delays, the final dates for the completion of compensation payments will be adjusted to the actual projects' implementation schedule.

8 Livelihood Restoration

8.1 Overview

Additional livelihood restoration support will be provided by the Project to affected fishers via the following three programmes:

- Training and employability enhancement;
- Local recruitment;
- Local procurement;

8.2 Training and Employability

In addition to the system of compensation (payments), it is possible to implement additional activities, such as workshops, training or employability programme. The selection of appropriate actions may be considered at a later stage. First, it should be determined whether fishers as a target group want to benefit from such actions and what type of training or programs they would need.

The training and employability programme could be targeting affected fishers, and the programme's objectives is to support the transition to professions needed in the offshore wind sector in Poland. However, it is already clear at this stage that most fishermen are not willing to change professions (close to retirement).

Eligibility conditions could be defined in consultation with affected fishers and other relevant stakeholders. The programmes or trainings could cover crew members, in addition to operators, of both commercial and recreational vessels, provided they meet certain defined conditions, including a minimal duration in the fishing-related job. Based on targeted fishers' experience and educational background, the training and employability programme could focus on the following sectors and professions:

- Operation of vessels transporting equipment and personnel to the wind farm in the construction phase;
- Offshore safety and security, including guard vessels that ensure compliance of third party vessels with security distances designated around the OWFs;
- Maintenance of vessels and other equipment.

Similar programmes have been run in Poland by other operators with specialised training partners. This may constitute experience for possible use.

8.3 Recruitment and Procurement

Operators and crew members of affected fishing vessels may also be considered for recruitment into jobs for which their initial skills and further training are relevant, subject to operational needs in construction and operations and their skills.

However, fishers must meet the requirements in the procurement processes. Potential collaboration may occur in the construction or operational phase and may be with Tier 1 suppliers or further down in the supply chain. In the event of cooperation opportunities, all the principles will be specified in the contracts.

9 Grievance Management

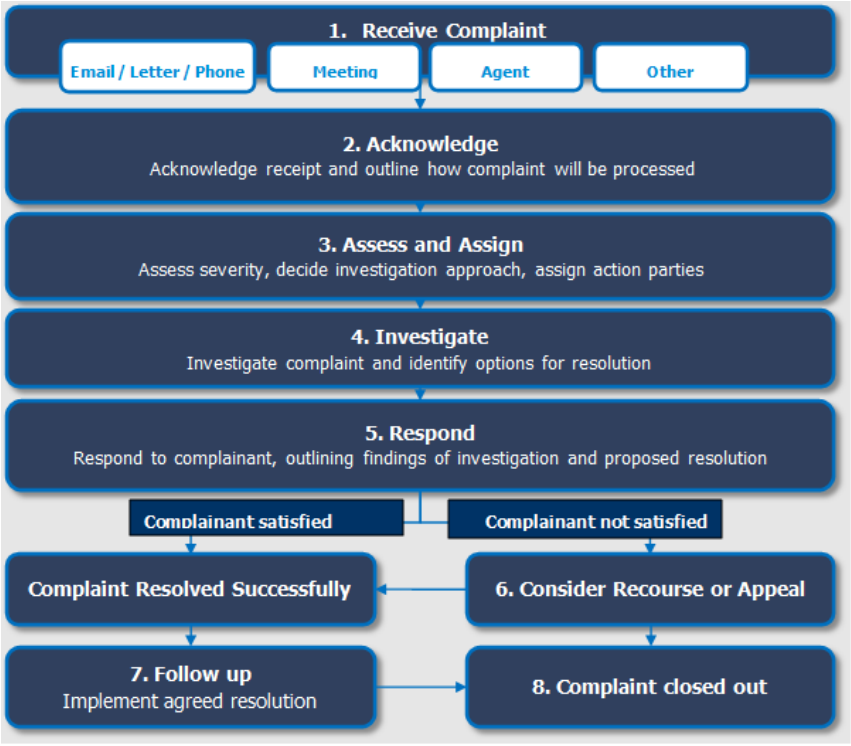
The Projects Community Grievance Management (CGM) process was initiated when the Projects developed the first Stakeholder Engagement Plan (SEP) in 2022, which was subsequently updated in 2024 and is available on the Projects' website www.baltyk123.pl. Key principles of grievance management are stated in the 2022 SEP and are in line with principles in international standards (prompt, culturally appropriate, swift, accessible, transparent, confidential, free-of-charge, and without retaliation).

The Projects CGM applies to all activities and components, including those under the responsibility of the investors in the Projects, their staff in contact with communities, contractors, and subcontractors. It is also applicable to all phases of the Projects, including construction and operations. It will be updated regularly to ensure it remains relevant and appropriate to the scale and phase of the Projects. Amongst others, it applies to activities under this LRP.

The SEP document provides detailed information on the purpose of this mechanism, its principles, management process, administering and publicizing the CGM, contractor grievance management, training, monitoring and reporting etc.

The figure below shows the grievance mechanism management process as presented in the SEP.

Figure 29 Grievance management flow chart



Source: SEP, 2024

Avenues to lodge a grievance include:

- Verbally or in writing to the Community Liaison Officer (CLO) in Ustka and in Łeba in Information Point
- Using the main reception number available at +48 22 522 39 00, available for Projects;
- In writing via email through a form sent to a designated email address or through the contact section available on the Projects' website: www.baltyk123.pl;
- In person by leaving a Grievance Form at the grievance box to be available at the Local Information Point address: Tadeusza Kościuszki St. 88, 84-360 Łeba. At a later stage of the Projects, it will be available in onshore O&M base located at the Port of Łeba, address: Jachtowa St. 8, 84-360 Łeba;
- In person by leaving a paper Grievance Form in any construction office for the respective stages of the investment (during construction);
- In writing via regular mail at the following address: MFW Bałtyk II Sp. z o.o. and MFW Bałtyk III Sp. z o.o., Krucza 24/26 Street, 00-526 Warsaw, Poland.

The Projects informs stakeholders about the CGM in the course of its engagement activities, and is expected to report on a regular basis to the public on its implementation, while protecting the privacy of affected individuals and abiding, amongst others, with the EU General Data Protection Regulation (GDPR).

Summary information about this mechanism has also been prepared for all stakeholders in the form of the paper leaflet, along with a form to fill out.

The latest activities related to enhancing the awareness of the CGM in Projects-affected communities are the following:

- June 2023 – opening of a Local Information Point in Łeba (Baltic Offshore Wind Farm Information Center), which allows all stakeholders to contact the Projects and access current information.
- 2024 – launch in April 2024 of the online portal Bałtyk123.pl which applies to all Bałtyk OWF Projects (Bałtyk 1, Bałtyk 2 and Bałtyk 3), in order to provide a unique platform for communication with stakeholders. This web portal includes an interactive grievance mechanism;
- Grievance mechanism form prepared in Polish and in English;
- Information leaflet in Polish, English and Kashubian;
- Enabling stakeholders to choose their preferred language of communication in the complaints and grievance process: Polish or English.

10 Monitoring and Evaluation

10.1 Overview

Monitoring and Evaluation are key components of the livelihood restoration process and are required by all international resettlement standards. The Monitoring and Evaluation process examines what worked and why, what did not work and why not, and what adjustments, changes or corrective actions need to be made.

Monitoring is the measurement through time that indicates the movement toward the objective or away from it. Evaluation is putting data to use, thus giving them value. From a practical perspective the aim is to identify the need for any changes or corrective actions that need to be made to reach the ultimate objectives, particularly fair compensation and livelihood restoration.

Monitoring and Evaluation are typically divided into three components, defined below

- Input (or progress) monitoring,
- Output (or performance) monitoring,
- Outcome (or impact) monitoring.

Input (or progress) monitoring: Measures whether inputs are delivered on schedule and as defined in the initial plan. Inputs are the services, resources or goods that contribute to achieving outputs and, ultimately, desired outcomes. Input monitoring is done internally on an on-going basis, often as part of the project general management system or quality assurance system.

Output (or performance) Monitoring: Measures the direct measurable results of the inputs, for example the number of people receiving compensation or completing livelihood restoration training course. Input and output monitoring together keep track of project implementation efficiency, and indicate whether changes need to be made to make the program operate more efficiently. Output monitoring is done internally.

Outcome (or impact) Monitoring: Defines the extent to which the project inputs and outputs are achieving or are likely to achieve the objectives of a program. A typical outcome that requires monitoring is livelihood restoration or reinstatement. Outcome evaluation, coupled with output monitoring results, indicate whether the program is genuinely working and should continue to be implemented as is, or whether fundamental changes have to be made. Outcome monitoring is usually carried out by an external independent entity.

Outcome monitoring can be integrated with the process of Compliance and Completion Monitoring and Auditing, which is mandated by international resettlement requirements.

10.2 Input and Output Monitoring

Input and output indicators are shown in the table below. Input and output monitoring will be carried out internally by the Investor.

Table 14 Input and Output Indicators

Indicator	Source of Information	Frequency of Measurement	KPI
Input indicators			
Overall spending on livelihood restoration activities, including TCM and non-TCM activities	Financial records – Investor	Semi-annually	KPI
Number of full-time staff dedicated to livelihood restoration	Investor	Semi-annually	-
Number of affected people by categories (commercial vessel PAPs, recreational vessel PAPs), including vulnerable, with disaggregation by gender	Consolidated list of eligible people	Semi-annually	-
Output indicators			
Number of people having received TCM compensation in the period with distribution by amount	TCM management files	Semi-annually	KPI
Number of TCM applications received in the period	TCM management files	Semi-annually	-
Number of TCM agreements signed in the period	TCM management files	Semi-annually	-
Amount of TCM payments made in the period	TCM management files	Semi-annually	KPI
Number of people having enrolled in non-TCM livelihood restoration trainings in the period (optional: if the program will be implemented)	Investor	Semi-annually	KPI
Number of people having successfully completed livelihood restoration trainings in the period	Investor	Semi-annually	KPI

Source: Sotis, 2025

10.3 Outcome Monitoring

The Project will use indicators and KPIs shown in the table below to carry out outcome monitoring of its livelihood restoration activities.

Table 15 Outcome Indicators

Indicator / Issue	Measured how	Frequency	KPI
Grievances			
Average time for grievance processing	Measure time interval between grievance registration and closure and time between grievance registration and first acknowledgement of receipt	Quarterly	-
Number of open grievances and trend in time	Grievance Management System	Monthly	KPI
Number of grievances opened in the period and trend in time	Grievance Management System	Monthly	-
Number of grievances closed in the period and trend in time	Grievance Management System	Monthly	-
Reoccurring complaints	Grievance Management System	Monthly	-
TCM			
Average time for payment of TCM compensation	Measure time between TCM application and actual payment	Quarterly	KPI
Use of compensation	What has compensation been used for? Survey of compensated households. Disaggregated by gender	Yearly	KPI
Livelihood restoration			
Activity transition (from fishing to another source of livelihood) – for those transitioning to another activity	Have compensated and supported fishers been able to successfully transition to another source of livelihood? Comparison between pre-TCM survey of activities and livelihoods and (1) one year after first TCM payment and (2) upon completion (interim survey one year after first TCM payment and final survey upon completion). Disaggregation between the different categories of affected people (commercial and recreational fishing vessels).	Twice, interim (one year after first TCM payment) and upon full completion	-
Activity re-establishment – for those not transitioning to another activity	Have compensated and supported fishers been able to successfully re-establish their fishing activity as a source of livelihood? Comparison between pre-TCM survey of activities and livelihoods and (1) one year after first TCM payment and (2) upon completion (interim survey one year after first TCM payment and final survey upon completion). Disaggregation between the different categories of affected people (commercial and recreational fishing vessels).	Twice, interim (one year after first TCM payment) and upon full completion	-

Source: Sotis, 2025

10.4 Monitoring Surveys

10.4.1 Pre-TCM Survey

Upon application to the TCM, fishers will be required to fill in a socio-economic and livelihood questionnaire, that will serve as a pre-TCM and livelihood restoration activities baseline, and will address the following:

- Household composition;
- Current streams of livelihood, including fishing and others;
- Indicative yearly income;
- Skills and aspirations;
- Potential vulnerability factors.

This survey will be conducted internally by the Investor with guidance from the compliance auditor mentioned in section 10.5 below, based on a structured and coded questionnaire, and its results will be summarized in a survey report. Where needed, corrections will be made with guidance from the compliance auditor, and their effectiveness will be checked in the completion survey.

10.4.2 Interim, Post-TCM Survey

As shown in the table above, the Project will conduct one interim monitoring survey of PAPs in the post-TCM situation to check the progress of livelihood restoration, the socio-current economic circumstances of PAPs per the baseline indicators mentioned in the section above (10.4.1). The survey processing will disaggregate those continuing fishing from those embarking into a transition to other livelihood activities. This survey will be conducted on all PAPs.

This survey will be conducted internally by the Investor, based on a structured and coded questionnaire similar to that used in the baseline.

10.4.3 Final Monitoring Survey

The survey above will be repeated upon full completion of all activities, including assistance to vulnerable people and livelihood restoration as a pre-condition to the Completion Audit mentioned in section Błąd! Nie można odnaleźć źródła odwołania. below.

10.5 External Compliance Monitoring

The Project will procure the services of an external compliance auditor to check on a six-monthly basis whether the implementation of the program complies with this LRP and international requirements.

The scope of work of the compliance auditor will include the following tasks:

- General:

- Assess overall compliance with commitments in this LRP and international requirements;
- Interview in each trip a representative cross-section of affected households to assess the performance of TCM compensation delivery; to measure the extent to which project affected people's standards of living and livelihood are being restored or enhanced; and to gather their opinions on TCM compensation delivery, livelihood restoration initiatives, and grievance management;

- Compensation process:
  - Review if eligibility is in line with commitments made in this LRP;
  - Review if TCM entitlements are delivered in time and, if not, whether any delays are justified;
- Livelihood restoration:
  - Verify that non TCM measures are in place and adequately implemented;
  - Check on the performance of these measures, including in consultation with target groups;
  - Check the outcome of these measures in terms of transition to non-fishing activities and reinstatement of fishing activities for those having selected such;
- Monitoring & Evaluation:
  - Review internal monitoring and reporting procedures to ascertain whether these are being undertaken in conformance with this LRP;
  - Review internal monitoring records as a basis for identifying any potential areas of non-compliance, any recurrent problems, or potentially disadvantaged groups or households;
  - Participate in the design of monitoring surveys (see 10.4 above) and their processing;
- Grievances:
  - Review grievance records for evidence of significant non-compliance or recurrent poor performance in implementation or grievance management;
  - Review the effectiveness of the grievance process per se, particularly from the angle of swiftness, fairness and the gender-balanced character of grievance management and resolution;
  - Check that avenues for lodging a grievance are functional and do allow PAPs to lodge grievance in a simple and easy manner;

- Vulnerable people:
    - Assess the vulnerable people pre-identification, identification, tracking and assistance systems, related records, and performance to determine compliance with provisions in this LRP;
- Implementation:
    - Assess whether resources are adequate for implementing the LRP and any training or capacity building requirements where gaps are observed or improvements are warranted;
    - Assess the data management system, particularly in relation to the TCM management process, and its outcomes;
    - Compare actual progress with initial schedule.

Compliance monitoring will take place twice a year during active implementation of this LRP until the Completion Audit (described in section Błąd! Nie można odnaleźć źródła odwołania. below). The external auditor will dedicate approximately 3 to 4 days to each of these missions, with most of this time dedicated to field visits and interviews in the project area, including interviews with key informants and stakeholders and affected people. Each of the auditor's missions will be sanctioned by a report prepared independently. Where gaps or areas are observed, the Compliance Auditor will recommend actionable activities based on their discussions with stakeholders and the Investor.

The Compliance Auditor should be selected amongst reputable individuals with significant international experience of implementing (not only auditing) compensation and livelihood restoration activities, including with fishers groups.

10.6 Completion Audit

The Project will organise that a Completion Audit will be carried out by an external party in line with applicable international standards. The goal of the Completion Audit is to verify that the LRP as implemented has been effective in restoring project affected peoples' standards of living and livelihoods, and if not, to recommend any necessary corrective actions. Accordingly, the Completion Audit has the following objectives:

- Verify that all entitlements, measures and commitments described in this LRP have been delivered;
- Determine whether LRP measures have been effective in restoring or enhancing affected parties' livelihoods (commercial and recreational fishers);
- Check on any systemic grievances that may have been left outstanding;
- Identify any corrective actions necessary to achieve completion of LRP objectives and commitments.

The livelihood restoration assessment will be based on the quantitative interim and final surveys described in section 10.4 above. Macro-economic factors will be taken into consideration as warranted when interpreting the results of these surveys (for example inflation, international and Polish fishing bans and their evolution, general growth of the economy or recession). In addition, the Completion Audit will utilize qualitative approaches to gather data and assess household standards of living. Particular attention will be paid to assessing the circumstances of vulnerable households and on potential gender impacts.

The Completion Audit report will present conclusions on the effectiveness of livelihood restoration and identify any corrective measures that would be necessary to complete livelihood restoration of PAPs. Subject to a detailed review of the economic, social and personal circumstances[35] of those households who would not have restored their livelihoods, corrective actions may address further assistance to these households (in particular vulnerable households).

The Completion Audit will be carried out one year after the active phase of compensation and livelihood restoration is complete. The Completion Audit could be carried out by the same individual as the Compliance Monitoring, or another consultant, as the case may be, under a contract passed with the Investor.

10.7 Disclosure of Monitoring Results

In accordance with the SEP (section 6.2), the Investor is required to prepare an Annual Environmental and Social Monitoring Report, which will be disclosed to external stakeholders. These reports are meant to cover, amongst others, the Project's environmental and social performance, stakeholder engagement activities, and grievance management.

[35] As many non-Project related factors could play a role in the ability or inability of some affected households to restore their livelihoods.

11 Action Plan

11.1 Roles and Responsibilities

The LRP will be implemented by the Project.

11.1.1 Internal Resources

The Stakeholder Manager with the assistance of the team designated to manage stakeholders for the Bałtyk 2 and 3 Projects (Stakeholder Management Team) are responsible for implementing the LRP. The Stakeholder Manager reports directly to the Project Director who is overall responsible for all project matters, including the LRP.

To further strengthen relationships with local Projects stakeholders (including fishers), two CLOs (Community Liaison Officers) were appointed, located in Łeba and Ustka. The CLOs work closely with the HSE/SSU Manager (Safety and Sustainability Manager) and the Stakeholder Manager. The CLOs are the regional contact points for the Bałtyk 2 and 3 Projects.

The Stakeholder Management Team is responsible for all stakeholder information and consultation activities, including organising consultation and information events in the Projects area with affected communities, including Fishers and relevant stakeholders (municipal authorities and other local and regional government agencies).

The Safety and Sustainability Manager is overall responsible for the grievance mechanism and gets assistance from the Stakeholder Management Team related to ensuring the management and processing of grievances as per the mechanism described in chapter 9 above.

11.1.2 External Support

Support in implementing the LRP will also be sought from the following partners:

- A consulting company with support from the National Marine Fisheries Research Institute (MIR) may be involved in managing the TCM compensation (consultation and information, applications from vessel operators, verifications of eligibility, interaction with operators, agreement signature, management of compensation payments);
- Reputable training institutes will be involved in the delivery of non-TCM livelihood restoration components (depends on needs surveys/assessment: trainings, employability enhancement, monitoring of outcomes).

The LRP will be periodically reviewed and updated where necessary as the Project progresses based on Project internal and external monitoring, and on stakeholder feedback and observations or to reflect any changes in relevant regulations/benchmarks (including the finalization of the final Code of Good Practice envisioned as part of the “Sector Deal”. In addition, the transition from the transitional compensation mechanism to

long-term livelihood restoration activities will also be subject to specific consultation activities and may require an update to this LRP.

11.2 Consultation and Disclosure

The LRP will be consulted upon per the following provisions and schedule:

- Disclosure in Polish language (electronic versions on the Project's website, notices in ports that the LRP is available with a link as a QR code, paper version available in Local Information Point in Łeba) – anticipated around mid September 2025 (published for 30 days);
- Consultation meetings in the key ports (Łeba, Ustka, Jarosławiec) with fishers on LRP and TCM, and collecting the applications for financial compensations – week starting from 22nd September, 2025;
- Consideration of comments as warranted – October/November2025.

11.3 Implementation Schedule

The following figure shows a tentative framework LRP implementation schedule:

Figure 30 LRP Implementation Schedule

No.	Action	2025		2026				2027				2028				2029	
		Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
1	**Disclosure of LRP and consultation**																
11	Disclosure of LRP Polish version	★															
12	Consultation meetings in ports	■															
13	Amendments to LRP as warranted by consultation outcomes		★														
2	**TCM Phase 1**																
21	Initiation and information	■															
22	Applications	■	■														
23	Verifications	■	■														
24	Agreements		■	■	■												
25	Payments																
3	**TCM Phase 2 (same phasing as above)**			■	■	■	■										
4	**TCM Phase 3 (same phasing as above)**							■	■	■	■						
5	**TCM Phase 4 (same phasing as above)**											■	■	■			
6	**Trainings and other non-financial compensations**																
61	Demand assessment, initiation and information	■	■	■													
62	Feasibility assessment with training institutes		■	■	■												
63	Eligibility assessment and establishment of individual training plans			■	■	■											
64	Negotiations and agreements				■	■	■										
65	Trainings					■	■	■	■	■	■	■	■				
7	**Monitoring**																
71	Internal monitoring	■	■	■	■	■	■	■	■	■	■	■	■	■	■		
72	Regular compliance reviews		★		★		★		★		★		★		★		
73	Completion audit																★

Source: Sotis, 2025

Annex 1. EU regulations

EU regulations	Short description
Convention on the Protection of the Marine Environment of the Baltic Sea	Convention on the Protection of the Marine Environment of the Baltic Sea of 22 March 1974, updated in 1992, ratified by Poland on 18 June 1980 and by EC/EU on 21 Feb 1994. The convention sets up the HELCOM commission[36], establishes a framework for international cooperation, information to the public and exchange of information at international level, as well as responsibility for pollutions, including lists of substances harmful to the marine environment, etc. The Convention defines the principle of pollution prevention, the use of best ecological practices and the best available technology comes first. HELCOM prepared the Baltic Sea Action Plan updated in October 2021[37], addressing sea based activities such as wind farms (mostly in terms of noise emission during preparation and project operation or decommissioning) and fish management actions including guides for sustainable use of fish resources.
Marine Strategy Framework Directive	Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive). The Directive refers to the United Nations Convention on the Law of the Sea (UNCLOS)[38] approved by the Council Decision 98/392/EC of 23 March 1998 concerning the conclusion by the European Community of the UNCLOS and the Agreement of 28 July 1994 relating to the implementation of Part XI and prepared a framework for marine strategies for each Member States. The marine strategy should be updated every 6-year and consulted with the public. According to the Directive, Poland should publish and make available to the public for comment summaries of the following elements of their marine strategies, or it related updates: 1) the initial assessment and the determination of good environmental status; 2) the environmental targets; 3) the monitoring programmes; 4) the programmes of measures.
Marine Spatial Planning Directive	Directive 2014/89/UE of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning (Marine Spatial Planning Directive). This directive introduces the requirement for member countries to develop spatial development plans of maritime areas by 31 March 2021 at the latest. It also establishes the obligation to review of these plans at least once every ten-year. It requires an integrated approach of planning, with engagement and consultation of stakeholders, use of the best available data and information, take into account land and sea interactions, ensure cross-border cooperation between Member States and promoting cooperation with third countries.
Directive on public access to environmental information	Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information. The Directive objectives are: 1) to guarantee the right of access to environmental information held by or for public authorities and to set out the terms and conditions of, and practical arrangements for, the exercise of this right; and 2) to ensure that environmental information is made available and disseminated to the

36 HELCOM

37 Baltic-Sea-Action-Plan-2021-update.pdf (helcom.fi)

38 UNCLOS+ANNEXES+RES.+AGREEMENT

EU regulations	Short description
	public in order to achieve the widest possible availability and dissemination of environmental information.
SEA and EIA Directives	Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment and Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment. The SEA and EIA Directives, transposed into Polish law by the EIA Act, and the Aarhus Convention cover access to environmental information, public information and consultation procedures during SEA and EIA processes.
Habitat and Birds Directives	Council Directive 92/43/EEC of 21 May1992 on the conservation of natural habitats and of wild fauna and flora and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. These directives were established for the protection of the natural environment of certain species of flora and fauna as well as fungi and their habitats (protected under Natura 2000) areas. They also concern the marine environment, in particular marine mammals and birds in the Baltic Sea. The impact assessment of draft strategic documents and planned investments on species and habitats is carried out in accordance with the procedure set out in the Habitats Directive, which, in Poland, has been transposed in national law by the Nature Conservation Act[39] and is integrated in SEA and EIA procedures.

Source: Sotis, 2025

[39]Consolidated text Journal of Laws of 2024, item 1478, 1940

Annex 2. Polish regulations

Legal framework	Short description
Offshore Act	The aim of the Offshore Act (Act of December 17, 2020 on promoting electric energy production in offshore wind farms) is to use the potential of wind energy in the Polish exclusive economic zone and to create legal solutions that will support all entities interested in the development of the offshore wind energy sector in Poland. The act specifies: 1) the principles and conditions for providing support for electricity generated in offshore wind farms; 2) the principles and conditions for the preparation and implementation of investments in the construction of offshore wind farms; 3) the principles for the management of the set of equipment used to transfer power and the offshore wind farm; 4) requirements for the construction, operation and decommissioning of offshore wind farms. The Act entered into force on February 18, 2021. This Act amended the Transmission Act by including in strategic investments (constituting public purpose investments) - investments in the scope of a set of devices used to extract power from offshore wind farms.
Transmission Act	The Transmission Act (Act of July 24, 2015 on the preparation and implementation of strategic investments in the field of transmission networks) specifies the rules for the preparation and implementation of strategic investments in the field of transmission networks, distribution networks and accompanying investments, as well as the sources of their financing. This Act qualifies transmission infrastructure from offshore wind farms as a strategic investment in transmission networks (since 2021). These investments are public purposes within the meaning of the Real Estate Management Act.
Maritime Safety Act	Act of 18 August 2011 on maritime safety is the basic legal act regulating matters of maritime safety in the field of ship construction, permanent installations and equipment, ship inspection, qualifications and composition of the ship's crew, safe maritime navigation and saving lives at sea. Chapter 5a of the Act regulates the requirements for the safe operation of offshore wind farms. An offshore wind farm must meet requirements for safety, protection of the marine environment, protection of the state border at sea and state defence set out in the regulations. Offshore wind farms must be built and operated with the assurance of: 1) compliance with the obtained permit for the erection or use of artificial islands, structures and equipment or agreement or permit for laying cables or pipelines in Polish maritime areas, and decision on environmental conditions; 2) shipping safety; 3) safety of personnel involved in the construction, operation and decommissioning of an offshore wind farm; 4) functioning of communication systems, maritime security, protection of the state border at sea and state defence; 5) protection of the marine environment. These provisions require the investor in offshore wind farms to develop a number of expert opinions that are approved by the relevant authorities, including navigational expertise.
Maritime Act	The Maritime Act (Act of 21 March 1991 on maritime areas of the Republic of Poland and maritime administration) determines the legal location of maritime

Legal framework	Short description
	areas the Republic of Poland, the coastal strip, sea ports and harbors and the rules for using these areas, as well as maritime administration bodies and their competences and the tasks of the State Maritime Hydrographic Service. Erecting or using artificial islands or structures and devices in Polish maritime areas requires obtaining a permit establishing their location and specifying the conditions of their use in these areas (Article 23). The construction and use of offshore wind farms in internal maritime waters and territorial sea is prohibited. Article 24 of the Maritime Act defines safety zones around artificial islands and groups of artificial islands (located at a distance of less than 1000 m from each other). Safety zones are also defined around cables and pipelines. The competent territorial director of the maritime office may establish by regulation safety zones adapted to the type and destination of artificial islands, other structures and equipments, cables or pipelines, which should be not more than 500 m from each point on the outer edge, unless another zone range is permitted by accepted international standards or recommended by the relevant international organization. The director of the maritime office is responsible for determining the conditions for movement in the safety zone, in particular may impose restrictions on shipping, fishing, water sports or diving or underwater work. The Act regulates the principles of planning and spatial development of marine areas of internal waters, the territorial sea and the exclusive economic zone - spatial development plans for maritime areas. Spatial development plans for internal marine waters, the territorial sea and the exclusive economic zone decide on: 1) basic function and permissible functions for each of the areas designated in the plans; 2) prohibitions or restrictions on the use of these areas, taking into account nature protection requirements; 3) distribution of public purpose investments; 4) directions of development of transport and technical infrastructure; 5) areas and conditions of environmental and cultural heritage protection; practicing fishing and aquaculture; obtaining renewable energy; exploration, identification of mineral deposits and extraction of minerals from deposits. Before the plan is adopted, public participation and extensive consultations take place. The plan is subject to periodic evaluation, at least once every 10 years.
Maritime Code	The Maritime Code (Act of 18 September 2001) regulates legal relations related to maritime navigation and the broadly understood use of the sea for economic purposes.
Water Law	The Water Law (Act of July 20, 2017) regulates water management in accordance with the principle of sustainable development, in particular the development and protection of water resources, the use of water and the management of water resources. The Act applies to internal marine waters; to the waters of the territorial sea in the field of water management, protection against pollution from land sources and protection against floods, and to the exclusive economic zone the Republic of Poland in the cases specified in the Act. In accordance with the Law, updates of the water management plan which includes surface and groundwater bodies and coastal waters (applicable primarily to the power line corridor) as well as updates of the Marine Water

Legal framework	Short description
	Protection Program[40] (applicable as well to the wind farm site) are prepared every 6 years. The adoption of the updated Programme must be done by way of a regulation. The draft regulation of the Council of Ministers on the adoption of the Marine Waters Protection Programme (RC5) has been made available in the Public Information Bulletin on the website of the Ministry of Infrastructure and in the Public Information Bulletin of the Government Legislation Centre, together with its justification and regulatory impact assessment. The legislative process is currently (as of November 2024) ongoing.[41]
EIA and SEA Act	The EIA Act (Act of October 3, 2008 on providing information about the environment and its protection, public participation in environmental protection and on environmental impact assessments) regulates SEA and EIA procedures integrated with procedures on impacts on Natura 2000 sites and Water Framework Directive goals. According to the Act all drafts of strategic documents including these related to offshore winds farms, sea-based activities etc. as well as planned investments listed in regulation have to have screening or full impact assessment procedures (appropriate assessment). During SEA and EIA procedures public participation process is guaranteed by law. Typically, is 21 or 30 days for public participation process, sometimes is taken two- or three-times during EIA or SEA procedures. If impact on the other country is expected, transboundary procedures according to Espoo Convention[42] takes place.
Construction Act	The Construction Act (Act of 7 July 1994) regulates activities relating to the design, construction, maintenance and demolition of buildings and defines the principles of operation of public administration bodies in these areas. Pursuant to this Act, building permits are issued for offshore wind farms and for energy transmission line.

Source: Sotis, 2025

[40] The last documents were prepared in 2016 kpowm-2016.pdf (kzgw.gov.pl) and adopted by the Council of Ministers on 11 December 2017 Rozporządzenie Rady Ministrów z dnia 11 grudnia 2017 r. w sprawie przyjęcia Krajowego programu ochrony wód morskich (sejm.gov.pl)

[41] https://legislacja.gov.pl/projekt/12389650

[42] Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) Text of the Convention | UNECE

Annex 3. Lenders requirements

Financial Institutions (FI)	Requirements of FI
International Finance Corporation (IFC): Performance Standard 5 "Land Acquisition and Involuntary Resettlement"	PS5 defines economic displacement as the loss of access to resources vital for livelihoods, such as marine areas, and requires project sponsors to provide fair compensation and livelihood restoration assistance, what includes conducting a baseline censuses, socio-economic surveys, identification of all area users, assessment of dependency on fishing, and development of appropriate livelihood restoration measures based on robust data. Requirements under PS5: • Protection of livelihoods even in the absence of physical displacement – for example, due to loss of access to fishing grounds. • Development of a socio-economic baseline for marine resource users, including demographic and operational data (vessels, ports, fishing type, intensity of area use). • Analysis of the project's impact on household income and ways of life for communities dependent on fishing. • Obligation to provide compensation and support alternative income opportunities or vocational training.
Equator Principles IV (2020) Principle 2 – Environmental and Social Assessment Principle 3 – Applicable Environmental and Social Standards Principle 5 – Stakeholder Engagement Principle 6 – Grievance Mechanism Principle 7 – Independent Review	• Comprehensive Environmental and Social Impact Assessment (ESIA), including economic displacement due to restricted fishing access. • Adherence to IFC PS5 as good international practice. • Continuous engagement with affected marine stakeholders. • Accessible grievance mechanism for fishers and communities. • Independent third-party review of compliance with EP4 and adequacy of the LRP.
European Investment Bank (EIB): Standard 6 "Involuntary Resettlement" (2022)	This Standard requires the identification and assessment of impacts on livelihoods and the development of appropriate mitigation and compensation measures. For this purpose, baseline socio-economic data should be collected. Requirements under Standard 6: • Identification of all individuals and livelihoods that may be negatively affected by the project. • Ensuring that the living conditions and income levels of affected persons are restored or improved. • Collection of detailed data on the number of fishing vessels operating in the project area, disaggregated by length categories and home ports. • Obligation to map marine resource users, including how both commercial and recreational fishers utilize the area. • Consideration of indirect impacts (e.g., changes in fishing routes, resource depletion).

Source: Sotis, 2025

Annex 4. Drafts of regulations

Draft of the regulation	Characteristics
Draft Act on amending the Act on promoting electric energy production in offshore wind farms and certain other acts. The version of the draft dated 6 February 2025, together with information about the next stages of government work on this act, is currently available.	The draft introduced, among other things, amendments to the Act on promoting electric energy production in offshore wind farms, by creating a legal basis for the payment of compensation to operators of fishing vessels for the loss of financial benefits resulting from the construction, operation, and decommissioning of an offshore wind farm and the associated power evacuation infrastructure (in draft Article 84b). On June 11, information appeared on government websites[43] that in the course of inter-ministerial consultations, the addition of Article 84b to the Act on the promotion of electricity generation in offshore farms was abandoned. According to information provided, this issue will be analysed as part of further legislative work.
Draft Act on state aid addressed to the vessels operators in connection with the introduction of a ban on cod fishing in the Baltic Sea.	The purpose of the Act is to provide financial support to vessel operators to move away from operating, caused by the introduction of a ban on cod fishing in the Baltic Sea on 1 January 2020. The aid granted under this Act is to equalise the economic situation of entities excluded from receiving support from EU funds, which, to the same extent as entities covered by this support, were harmed in connection with the introduction of the ban on cod fishing in the Baltic Sea. The draft Act concerns vessels intended or used exclusively for sports or recreation, as part of the business of providing a vessel for a fee for the purpose of catching marine organisms on the basis of a sports fishing permit in accordance with the provisions on fisheries – provided that it is not used to carry more than 12 passengers as part of this activity. The financial support offered from the state budget is to apply to an entrepreneur who: • scraps a vessel, • undertakes to scrap the vessel within 120 days of receiving the support, or • transfers a vessel to a public administration office or a public school under a donation agreement for purposes unrelated to the performance of business activities. The limit of financial resources allocated for financial support is PLN 50 million. The proposed amounts of aid are to compensate for the lost revenues of owners of recreational (angling) vessels in the years 2020-2025, as well as the costs of port fees, insurance, taxes and employee salaries incurred during this period. These amounts are also to ensure the existence of entrepreneurs and their families in a situation where it is impossible to continue their business and there is a need for costly disposal of the vessels. Support is to be provided once per vessel, only in 2025. The project estimates that financial support will be provided to approximately 98 recreational vessels. The project is currently (April 2025) at an advanced stage of government work[44]

Source: Sotis, 2025

[43] https://legislacja.rcl.gov.pl/projekt/12394351/katalog/13110260#13110260

[44] Projekt ustawy o pomocy państwa skierowanej do armatorów jednostek pływających w związku z wprowadzeniem zakazu połowu dorsza na Morzu Bałtyckim - Kancelaria Prezesa Rady Ministrów - Portal Gov.pl and https://legislacja.rcl.gov.pl/projekt/12389350/katalog/13080039#13080039

Annex 5. Application Verification Checklist

STAGE 1: Application Registration

☐ Application assigned an identification number
☐ Date and place of submission recorded
☐ Application format identified (paper/electronic)
☐ Applicant's signature confirmed
☐ Completeness of application and attachments verified
☐ Details of receiving officer/operator recorded
☐ Copy of application and attachments entered into the database

STAGE 2: Verification of Contact Details

☐ Correctness of phone number confirmed
☐ Correctness of email address confirmed
☐ In case of incorrect data - request for update sent
☐ Preferred method of contact specified

STAGE 3: Assessment of Application Completeness and Accuracy

3.1. Formal Data
☐ Applicant's data complete
☐ Contact details complete
☐ Vessel data complete
☐ Right to represent the vessel owner verified

3.2. Required Attachments
☐ All required attachments provided
- ☐ Vessel ownership title
- ☐ Document confirming vessel operator status
- ☐ Special fishing permit (if applicable)
- ☐ Certificate of vessel activity (if applicable)
- ☐ Power of attorney for the institution (if applicable)
- ☐ Power of attorney for representation (if applicable)
- ☐ List of vessel owners (if applicable)

3.3. Actions in Case of Deficiencies
☐ Request for missing data or documents sent
☐ In case of no response - application rejected
☐ Procedure concluded in accordance with Stage 7

STAGE 4: Verification of Fishing Activity in Databases

☐ Assessment of fishing activity carried out in official databases
☐ (Optional) Additional information obtained from the applicant
☐ Additional verification conducted based on submitted evidence
☐ After analysis, decision taken to proceed or return to Stage 3.3

STAGE 5: Preparation of Agreement

5.1. Registration of Applicant's Data
☐ Applicant's data forwarded to investor for registration
- ☐ Company / full name

- ☐ Address
- ☐ Tax Identification Number (NIP), Statistical Number (REGON), Court Register Number (KRS) (if applicable)
- ☐ Bank account numer

☐ Investor registered applicant's data
☐ Investor did not register applicant's data – application referred to Stage 3.3

5.2. Drafting and Signing of Agreement

☐ Draft agreement prepared
☐ Draft agreement sent to applicant
☐ Applicant returned signed agreement to investor
☐ Investor signed agreement and forwarded it to applicant
☐ Signed scan of agreement uploaded to database

STAGE 6: Issuing Invoice and Payment Processing

☐ Applicant issued invoice
☐ Invoice verified by advisor with respect to:

- ☐ Completeness of formal data
- ☐ Compliance with agreement
- ☐ Correct VAT rate and tax status of issuer
- ☐ Correct bank account number, including compliance with documentation and entry in the official VAT whitelist

☐ In case of irregularities – correction and re-verification of invoice carried out
☐ Verified invoice forwarded to inwestor
☐ Investor registered applicant in the system
☐ Investor executed payment
☐ Payment confirmation and correspondence uploaded to database

STAGE 7: Closure of Compensation Application Process

☐ Documentation in database updated
☐ Date of process closure recorded
☐ Complete set of documents archived
☐ Case status marked as "closed"

Annex 6. List of documents used

- Livelihood Restoration Framework (LRF) for Projects Off-Shore Components, MFW Bałtyk II & MFW Bałtyk III Wind Farms, October 2024
- Livelihood Restoration Plan (LRP) for Projects On-Shore Components, Offshore Wind Farms MFW Bałtyk II & MFW Bałtyk III, June 2024
- Stakeholders Engagement Plan (SEP), Offshore Wind Farms MFW Bałtyk II & MFW Bałtyk III, September 2024
- Analysis of reports on recreational sea fishing for the years 2016-2023, Wiadomości Rybackie, Magazine of the MIR - National Research Institute, WR 7-8 (260), July - August 2024, WR-7-8.24-MIR.pdf
- Scoping Report, Bałtyk 2 and Bałtyk 3 Offshore Wind Projects (Poland), March 2025
- Survey Report, Bałtyk 2 and Bałtyk 3 Offshore Wind Projects (Poland), April 15, 2025
- EIB: EIB Environmental and Social Standards
- IFC: https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standard-5-en.pdf
- IFC: 2012-ifc-ps-guidance-note-5-en.pdf
- The Equator Principles_EP4_July2020
- Navigational Analysis for the connection infrastructure of the MFW Bałtyk I offshore wind farm. Analysis for the needs of the EIA Report prepared for EKO-KONSULT Sp. z o.o., June 2024