



Environmental and Social Action Plan (Draft)

MFW Bałtyk II and MFW Bałtyk III

PREPARED FOR



DATE

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1. ENVIRONMENTAL AND SOCIAL ACTION PLAN

This report constitutes the Environmental and Social Action Plan (ESAP) Report for the Bałtyk II&III Offshore Wind Farm Projects prepared by Environmental Resources Management (ERM).

Table 1.1 summarises the review of the environmental, social and health and safety gaps that was encountered in the ESDD Report (see Section 2 of the ESDD Report). It also defines corrective measures when:

- Additional information on Project management is needed - recommendations on the ESMS component and management plans and procedures (updates) will need to be addressed once Project management details are determined (still being developed by the Project) and prior to the construction start.
- Additional information on E&S topics, as well as future siting of camps, and other temporary infrastructure is required - recommendations on specific E&S issues will need to be considered prior to the execution of activities at these specific locations.

A total of 25 measures are proposed:

- 0 classified as "High" E&S gap level; addressing a significant gap with the requirements of the Applicable Standards, requiring immediate corrections to the Project's E&S activities.
- 7 are of "Medium" E&S gap level; addressing a gap with the requirements of Applicable Standards, requiring upgrades that may be addressed as part of an action plan;
- 18 are "Low" E&S gap level which may be easily addressed, and which are not expected to hinder international lenders support from an environmental and social point of view.

Medium level gaps include finalising the ESMS and management plans.

Regarding the timing of the ESAP items, it is noted that the following key milestones will be used:

- Financial close – Q4 2024;
- Commencement of onshore works (site preparation) – Q3 2024;
- Commencement of offshore works (installation) – Q2 2025; and
- Commencement of operations – 2028.

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TABLE 1.1 ENVIRONMENTAL AND SOCIAL ACTION PLAN

No.	Recommended Action	Requirement (IFC PS/EP)	Significance / Priority	Action Owner	Schedule	Indicator / Evidence of completion
1.1	Obtain approval (Environmental Decision) for the O&M base.	PS1 / E&S Assessment and Management System EP / Principle 2,3,4	Low (O&M)	Equinor Permitting Team	Prior to onshore Construction Phase	Environmental Decision
1.1	Finalise and implement Environmental and Social Management System for the Project in line with IFC PS1.	PS1 / E&S Assessment and Management System EP / Principle 2,3,4	Low (all)	JV SSU Team	Prior to Financial Close	ESMS
1.2	<p>Prepare all Construction Management and Monitoring Plans and confirm if these will be the responsibility of the JV or EPCs. These plans will need to cover both construction and operational Phases of the Project. These plans include:</p> <ul style="list-style-type: none"> Waste Management Plan Emergency Response Plan (<i>note, this should take into account the pollution plan and rescue plan to be drafted for local requirements</i>) Livelihood Restoration Plan (<i>for offshore and onshore</i>) Maritime Operations and Safety Plan Construction and Installation Plan Traffic Management Plan Construction ESMMP (including air, noise, water, soil, and sediments) Working Conditions and Labour Management Plan (including supply chain and contractors) Cultural Heritage Management Plan (including chance find procedure) Contractor Management Plan Community Health and Safety Plan Occupational Health and Safety Plan Security Management Plan Biodiversity Management Plan (including invasive species plan) Prepare robust Environmental Monitoring Plan. This can be part of the Management Plan(s). <p>Ensure Monitoring Plans include monitoring of emissions and discharges to ensure that the requirements of Performance Standard 3 and the ED's are being met.</p>	<p>PS1 / E&S Assessment and Management System</p> <p>EP / Principle 2PS1 / Environmental and Social Assessment and Management System</p> <p>EP / Principle 3</p>	Medium (all)	JV SSU Team / EPC	<p>Prepare: Prior to onshore Construction Phase and offshore Construction Phase</p> <p>Implement: During Construction</p>	Management and Monitoring Plan(s)
1.2	<p>Prepare all Operational Management and Monitoring Plans and confirm if these will be the responsibility of the JV or EPCs. These plans include:</p> <ul style="list-style-type: none"> Waste Management Plan Emergency Response Plan (<i>note, this should take into account the pollution plan and rescue plan to be drafted for local requirements</i>) Livelihood Restoration Plan (<i>for offshore and onshore</i>) Maritime Operations and Safety Plan Traffic Management Plan Operation ESMMP (including air, noise, water, soil, and sediments) Working Conditions and Labour Management Plan (including supply chain and contractors) Cultural Heritage Management Plan (including chance find procedure) Contractor Management plan Community Health and Safety Plan Occupational Health and Safety Plan 	<p>PS1 / E&S Assessment and Management System</p> <p>EP / Principle 2PS1 / E&S Assessment and Management System</p> <p>EP / Principle 2</p>	Medium (all)	JV SSU Team / EPC	<p>Prepare: Prior to Operational Phase</p> <p>Implement: During Operation</p>	Management and Monitoring Plan(s)

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No.	Recommended Action	Requirement (IFC PS/EP)	Significance / Priority	Action Owner	Schedule	Indicator / Evidence of completion
	<ul style="list-style-type: none"> Security Management Plan Biodiversity Management Plan (including invasive species) Prepare robust Environmental Monitoring Plan. This can be part of the Management Plan(s). Ensure Monitoring Plans include monitoring of emissions and discharges to ensure that the requirements of Performance Standard 3 and the ED's are being met.					
1.3	Ensure all policies are communicated to employees and relevant stakeholders linked to the project as EPC and other subcontractors, at all levels and all functions of the JVs organisation.	PS1 / Policy	Low (all)	JV SSU Team	Prior to Financial Close	Policies / employment contracts
1.4	Include the mitigation and enhancement measures from the social baseline and assessment report (2024) in the respective social management plans.	PS1 / Identification of risks and impacts EP / Principle 2	Low (ECI and O&M)	Third Party Consultants	Prior to Construction Phase	Community H&S Plan.
1.4	Adopt all recommendations outlined in the HRIA (2023) addressing the identified six salient human rights risks: <ul style="list-style-type: none"> (1) Injuries and potential fatalities resulting from transport and traffic incidents (on and off-shore) (2) Loss of access by private owners to their land, natural resources and related livelihoods (3) Loss of access by fishers to fishing grounds, natural resources and related livelihoods (4) Injuries or detentions by public (or private) services forces as a result of clashes with potential protestors/workers (5) Insufficient meaningful engagement with potentially affected stakeholders. (6) Impacts on workers rights/conditions and fair remuneration of offshore and onshore contractors and related supply. 	EP / Principle 2 PS1 / Identification of risks and impacts EP / Principle 2	Low (all)	JV SSU Team Third Party Consultants	Prior to Financial Close	Human Rights KPIs
1.4	Maintain a watching brief on the four human rights issues identified in the HRIA (2023). During stakeholder engagements with the communities, be alert to any of the four issues being raised, which may indicate a need to conduct a HRIA.	EP / Principle 2	Low (all)	JV SSU Team	Prior to Financial Close	Community engagement
1.4	Establish Human Rights Key Performance Indicators (KPIs) for the Project. This can be included as part of the JVs Sustainability Reporting and auditing of the management plans linked to Human Rights.	EP / Principle 2	Low (all)	JV SSU Team	Prior to Financial Close	KPIs
1.5	Appoint a Community Liaison Officer (CLO) or similar. This will be required for offshore and onshore impacts. It is noted that there is a CLO for the Project based in Łeba and recruitment is ongoing for CLO in Utska.	PS1 / Organizational capacity and competency	Low (all)	JV SSU Team	Prior to onshore Construction Phase and offshore Construction Phase	CLO appointment / contract
1.5	Ensure that adequate personnel have been appointed to develop and implement the Biodiversity Management Plan.	PS1 / Organizational capacity and competency	Low (all)	JV SSU Team	Prior to onshore Construction Phase	Appointment / contract
1.6	Provide a robust and final version of the ERP which covers the identified gaps (e.g. training and practice, assessment of the degree of risks linked to the project, information covering the O&M base, etc.) which will need to be implemented for the Project, including potential effect on communities and periodic training to ensure effective response. It is recommended to follow the World Bank Guidelines for emergency preparedness and response.	PS1 / Emergency preparedness and response	Low (all)	JV SSU Team	Prior to onshore Construction Phase and offshore Construction Phase	ERP

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No.	Recommended Action	Requirement (IFC PS/EP)	Significance / Priority	Action Owner	Schedule	Indicator / Evidence of completion
	<ul style="list-style-type: none"> The JV will need to obtain a confirmation letter (or similar) from the local authority that the compensation payment related to the one household (for which the Act of 24 July 2015 will be adopted) will be paid post commencement of construction. Compensation payments for those affected by resettlement should be held in an escrow account set up by the JV for earmarking the funds until a decision is made regarding the payment timing and amount owed. Implement LRP monitoring and Completion Survey as specified in the LRP. 					
5.1	<p>The full Livelihood Restoration Plan (LRP) (offshore) will need to be prepared for the Project. In order to prepare a LRP, there are key steps to undertake:</p> <ul style="list-style-type: none"> Identify a list of stakeholders for consultation, helping to list key issues and/or concerns (e.g. number of vessels, fishermen's interest, changes in profession; community benefits, investors options, educational options, compensations stages.); State cut-off date for census; Prepare clear and detailed background information about the development itself to communicate steps, key stages and relevant sections for the offshore system, including cable connections, fisheries activities, Marine Spatial plans and legislations); To synthesise and create awareness of relevant permits and commitments such as the green transmission commitments; To input to a "Code of Good Practices" (including ToRs) to ensure co-existence with the fisheries sectors; To document fisheries information (e.g. data, ports, catching, To review and discuss compensation schemes /frameworks (some key aspects will include livelihood level effects, residual impacts and mitigation plans and culturally sensitive groups). To review the level of the Compensation plan (e.g. The administrator body, one payment, regular payments, Support, Assess Fishers employment over construction and/operation practices if there is opportunity to reemployment). Compilation of new strategies (e.g. new training, new fishing methods, Reef Habitats, new species to facilitate new fisheries alternatives). Discuss with relevant stakeholders. 	PS5 / Project Design	Low (OWFs)	JV SSU Team / third party	Prior to Construction Phase for offshore	LRP (offshore)
5.1	Finalise the Sector Deal on Fisheries impact (with relevant authorities and other operators). Should the Sector Deal not be finalised by the authorities in time, the JV will provide compensation as per the projects LRF.	PS5 / Compensation and benefits for displaced persons EP / Principle 2	Medium (OWFs)	JV SSU Team / Relevant Authority	Prior to Offshore Construction Phase	Sector Deal Fisheries Study
6.4	<p>Classify and map natural and modified habitat within the AoI of the full Project.</p> <p>Assess the amount of loss of Critical Habitat, natural habitat and modified habitat from the Project. Information should be presented within a Biodiversity Action Plan as the basis for No-Net-Loss and Net Gain commitments.</p>	PS6 / Critical Habitat Assessment EP / Principle 2	Medium (offshore)	JV SSU Team	Prior to Offshore Construction Phase	Biodiversity Action Plan
6.4	Develop a BAP (with third party to address the requirements of Paragraph 20 (protected areas), Paragraph 16 (Critical Habitat) and Paragraph 14 (natural habitat).	PS6 / Critical Habitat Assessment EP / Principle 2	Medium (offshore)	JV SSU Team	Prior to Offshore Construction Phase	Biodiversity Action Plan

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No.	Recommended Action	Requirement (IFC PS/EP)	Significance / Priority	Action Owner	Schedule	Indicator / Evidence of completion
	<p>The BAP should clearly state the Critical Habitat triggers detailed in the CHA report and the amount of Critical Habitat, natural habitat and modified habitat to be lost by the onshore and offshore components of the Project, and how Net Gain for Critical Habitat and No Net Loss for natural habitat will be met. The BAP should also set out the Project’s approach to mitigating impacts on biodiversity. The BAP should be a living document, and if additional monitoring or assessment identifies further critical or natural habitat sensitivities or Project requirements, the BAP should be updated accordingly.</p> <p>Protected area and species specialist group/species expert stakeholders should be engaged throughout the development of the BAP.</p> <p>A long-term biodiversity monitoring and evaluation programme should be developed and integrated into the JV’s management programme. This can be included within the BAP.</p>					



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