



Goliat Photovoltaic Farm Stakeholder Engagement Plan

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Goliat Photovoltaic Farm Stakeholder Engagement Plan

PROJECT:

Goliat Photovoltaic Farm

Poland, Pomorskie Voivodship, Słupski County,
Potęgowo Municipality

EMPLOYER:

Mashav Hama LLC

Zielna 37 Street, building C/XII floor
00-108 Warsaw
Poland



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00-108 Warsaw
Poland



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Glossary

Company	Mashav Hama LLC
EBRD	European Bank for Reconstruction and Development
ED	Environmental decision
EIA	Environmental impact assessment
EIA Act	Act of October 3, 2008, on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws. 2008 No. 199 item 1227)
GM	Grievance Mechanism
NGO	Non-governmental organisation
PR	Performance Requirement
Project	Goliat Photovoltaic Farm
SEP	Stakeholder Engagement Plan
PV	Photovoltaic farm

1. Introduction

This Stakeholder Engagement Plan (SEP) was developed to manage the impacts on local community occurring from the activity during every phase of the Goliat Photovoltaic Farm (Goliat PV, the Project).

The document identifies the Project's stakeholders and establishes rules for managing the exchange of information between Mashav Hama LLC and its stakeholders. Also, responsibilities for implementation of actions concerning stakeholders are defined in SEP. This document will give focus i.a. on legal requirements for public consultation, undertaken and planned events related to stakeholder engagement, stakeholder identification and engagement program, and framework for stakeholder engagement actions.

This document is created based on the international guidelines ensuring Project's compliance with good international practices relating to sustainable development, social safety, and equality (EBRD 2023a).

Goliat PV is situated in northern part of Poland in Pomorskie Voivodship, Słupski County, Potęgowo Municipality. The planned Goliat PV, with a capacity of up to 500 MW, is located on plots of land in the cadastral districts:

- Głuszynko – plots number: 1/20, 1/22, 1/23, 1/24, 1/25, 1/26, 1/27, 1/28, 1/29, 1/30, 1/31, 156, 157, 158, 159, 171, 172, 173, 2/1, 2/3, 2/8, 2/9, 2/10, 2/11, 2/12, 2/13, 2/15, 2/16, 3/20, 3/21, 3/22, 43,
- Grapice – plots number: 1/19, 154, 2/5, 3/10, 3/11, 3/12, 3/13, 3/14, 3/15, 4/18, 4/19, 4/20,
- Nieckowo – plot number: 160,
- Rzechcino – plots number: 78/3, 78/5, 78/6.

The Project is in the pre-construction phase. Its construction is planned to be launched in Q1 2025.

2. Legal requirements and standards for public consultation

According to current Polish legislation, public consultations may be required as part of the environmental impact assessment (EIA) procedure in the case of projects that may always have a significant impact on the environment and projects that may potentially have a significant impact on the environment (if the obligation to carry out an EIA procedure is imposed by the competent authority). These issues are regulated by the Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments (EIA Act, Journal of Laws. 2008 No. 199 item 1227), which is the implementation of European Union legislation – 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 Goliat PV was recognised as the project likely to have a potentially significant impact on the environment. The authority issuing the Environmental Decision (ED, in this case – the Head of Potęgowo Municipality), after obtaining the opinions of the consulting bodies, imposed the obligation to conduct an EIA procedure in decision dated July 12, 2023 (sign: NŚR.6220.2.2023).

The Goliat PV was granted a decision no. NŚR.6220.2.2023 on 3rd of July 2024 by the Head of Potęgowo Municipality.

The scope of information disclosed in the course of the EIA procedure included, *inter alia*, a general presentation of the project, a presentation of its environmental and social effects and a description of the measures necessary to mitigate those effects. Disclosure of such information and ensuring public participation in the EIA procedure was the responsibility of the authority responsible for conducting the procedure. Such authority was obliged to make available to the public the opinions, resolutions and decisions issued in the course of the procedure, as well as to make available the environmental documentation produced in the

course of the procedure. It was also obliged to receive and consider comments and complaints submitted by interested parties. The Project has not received any grievances.

The Project was also subject to formal public consultations as part of the procedure for adopting the Local Spatial Development Plan for the area covered by the investment in question. The issue of public participation in the administrative procedure aimed at enacting spatial plans at the national, regional and local level is regulated in Poland by 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. This directive is transposed by the EIA Act. The Project has not received any grievances.

Apart from the national requirements with respect to the consultation process, for projects to be financed by European Bank for Reconstruction and Development (EBRD) specific requirements apply as specified by the PR 10 (EBRD 2023a).

3. Summary of activities related to stakeholder engagement to date

Activities Mashav Management LLC related to stakeholder engagement, in the municipalities involved in the investment, carried out to date included:

- monthly meetings with landowners to inform them about the status of the Project, since 2020,
- quarterly meetings in the municipalities, since 2021,
- annual support of communes' harvest events, since 2015,
- reconstruction of the commune and county roads in the vicinity of the Project, since 2018,
- annual support of table tennis team, since 2021,
- annual support of Nordic walking team, since 2024,
- annual support of football team, since 2021,
- providing awards for smaller events in the villages, since 2021.

4. Stakeholder identification and analysis

The stakeholder groups identified for the Project are grouped into 6 major categories, a full list of which is presented below (Table 4.1).

Table 4.1 Stakeholders' characteristics

No.	Stakeholder category	Stakeholder characteristic
1. Communities and individuals		
1.1	Residents of Potęgowo and Damnica, Municipalities	According to Central Statistical Office (website 1), the municipality in which the project is located had the following population in 2023: Potęgowo – 6,512 residents, Damnica – 5,646 residents
1.2	The landowners of the plots on which the project is located, i.e. owners of the land where panels, road infrastructure and cable connection are located	Contact details are held by Mashav Hama LLC, which is also responsible for relations and contact with the landowners of the plots.
1.3	Employees of the Company and contractors of the civil works and operations	The construction and operation of the PV will be outsourced to external contractors. Mashav Hama LLC is holding management position.
2. Distribution System Operator		
2.1	Distribution System Operator	Polskie Sieci Elektroenergetyczne S.A. 165 Warszawska St., 05-520 Konstancin-Jeziorna, Poland phone: +48 22 242 26 00 e-mail: pse@pse.pl https://www.pse.pl/
3. Administrative users		
3.1	Ministry of Economic Development and Technology	Ministry of Economic Development and Technology 3/5 Trzech Krzyży Sq., 00-507 Warsaw, Poland phone: +48 222 500 123 Citizen's Helpline: +48 222 500 115
3.2	Ministry of Climate and Environment	Ministry of Climate and Environment 52/54 Wawelska St., 00-922 Warsaw, Poland

No.	Stakeholder category	Stakeholder characteristic
		phone: +48 22 36-92-900 helpline: +48 222-500-136 e-mail: info@klimat.gov.pl
3.3	Voivodship Offices	Pomorskie Voivodship Office in Gdańsk 21/27 Okopowa St., 80-810 Gdańsk, Poland phone: +48 58 307 76 95 e-mail: zok@gdansk.uw.gov.pl https://www.gov.pl/web/uw-pomorski
3.4	Energy Regulatory Office	Energy Regulatory Office 25a Towarowa St., 00-869 Warsaw, Poland phone: +48 22 487 55 70 e-mail: ure@ure.gov.pl electronic mailbox on the ePUAP platform: /URE/SkrytkaESP https://www.ure.gov.pl/
3.5	General Directorate for Environmental Protection	General Directorate for Environmental Protection 136 Jerozolimskie Av., 02-305 Warsaw, Poland phone: +48 22 310-67-00 e-mail: kancelaria@gdos.gov.pl
3.6	Regional Directorates for Environmental Protection	Regional Directorate for Environmental Protection in Gdańsk 54/57 Chmielna St., 80-748 Gdańsk, Poland phone: +48 58 683 68 00 e-mail: sekretariat@gda.rdos.gov.pl
3.7	National Labour Inspectorate	National Labour Inspectorate General Labour Inspectorate 28/30 Barska St., 02-315 Warsaw, Poland phone: +48 22 391 82 15 e-mail: kancelaria@gip.pip.gov.pl
3.8	Building Control Inspectorate	General Office of Construction Supervision 38/42 Krucza St., 00-926 Warsaw, Poland phone: +48 22 346 66 64 e-mail: kancelaria@gunb.gov.pl
3.9	District Building Inspector	District Building Inspector in Słupsk 14 Szarych Szeregów St., 76-200 Słupsk, Poland

No.	Stakeholder category	Stakeholder characteristic		
		phone: +48 59 841 85 49 e-mail: pinb@slupskie.pinb.gov.pl		
3.10	Regional Sanitary and Epidemiological Station	Regional Sanitary and Epidemiological Station in Gdańsk 4 Dębinki St., 80-211 Gdańsk, Poland phone: +48 58 344 73 00 e-mail: poczta@wsse.gda.pl		
3.11	District Sanitary and Epidemiological Stations	District Sanitary and Epidemiological Station in Słupsk 8 Piotra Skargi St., 76-200 Słupsk, Poland phone: +48 59 843 12 91 http://psseslupsk.pis.gov.pl/		
3.12	Voivodship Monuments Conservators	Pomorskie Voivodship Office for Monument Protection Delegation in Słupsk 6 Jaracza St., 76-200 Słupsk, Poland phone: +48 59 842 64 34 extension 31 e-mail: slupsk@zabytki.mail.pl		
3.13	Voivodship Marshall	Marshal's Office of the Pomorskie Voivodship in Gdańsk 21/27 Okopowa St., 80-810 Gdańsk, Poland phone: +48 58 307 76 95 e-mail: zok@gdansk.uw.gov.pl https://www.gov.pl/web/uw-pomorski		
3.14	Local government administration	Potęgowo Municipal Office 5 Kościuszki St., 76-230 Potęgowo, Poland phone: +48 59 811 50 72 e-mail: sekretariat@potegowo.pl	Damnica Municipal Office 1 Góra St., 76-231 Damnica, Poland phone: +48 59 848 44 31 e-mail: ug@damnica.pl	County Office in Słupsk 14 Szarych Szeregów St., 76-200 Słupsk, Poland phone: +48 59 841 85 00 e-mail: starostwo@powiat.slupsk.pl
3.15	Police	District Police Station in Słupsk 1 3. Maja Av.,		

No.	Stakeholder category	Stakeholder characteristic
		76-200 Słupsk, Poland phone: +48 47 742 01 00 e-mail: e-mail: komenda.slupsk@gd.policja.gov.pl
3.16	Fire Department	Volunteer fire brigade in Potęgowo 2 Pocztowa St., 76-230 Potęgowo, Poland phone: +48 59 811 50 98
4. Non-governmental organisations (NGOs)		
4.1	National environmental organizations and organizations working to protect avifauna and chiroptero fauna	<p>OTOP – The Polish Society for the Protection of Birds 24 Odrowąża St., 05-270 Marki near Warsaw, Poland phone: +48 22 761 82 05, +48 22 188 50 81 e-mail: biuro@otop.org.pl https://otop.org.pl/</p> <p>OTON – The Polish Society for the Protection of Bats 28 Wojska Polskiego St., 60-637 Poznań, Poland phone: +48 605 580 285 e-mail: oton@nietoperze.pl https://nietoperze.pl/</p> <p>WWF Poland 11 Usypiskowa St., 02-386 Warsaw, Poland phone: +48 22 660 44 33 e-mail: kontakt@wwf.pl https://www.wwf.pl/</p> <p>Polish Society for Nature Conservation "Salamandra" 7/3 Stolarska St., 60-788 Poznań, Poland phone: +48 61 843 21 60 phone (urgent matters relating to bats): +48 604 83 65 83 e-mail: biuro@salamandra.org.pl e-mail (urgent matters relating to bats): nietoperze@salamandra.org.pl https://www.salamandra.org.pl/home.html</p> <p>The Ecological Association EKO-UNIA 26 Białoskórnica St., 50-134 Wrocław, Poland phone: +48 71 344 22 64 e-mail: info-ekounia@eko.org.pl https://eko-unia.org.pl/</p>
5. Media		

No.	Stakeholder category	Stakeholder characteristic
5.1	Local media	<p>Głos Pomorza https://gp24.pl/tag/gmina-potegowo</p> <p>Słupsk Nasze Miasto https://slupsk.naszemiasto.pl/tag/potegowo</p> <p>TV Słupsk 3 Waryńskiego St., 76-200 Słupsk, Poland phone: 519 699 762 redakcja@tv-slupsk.pl https://www.tv-slupsk.pl/</p>
6. Lenders		
6.1	International Financial Institutions	<p>European Bank for Reconstruction and Development Warsaw Resident Office 53 Emilii Plater St., Warsaw Financial Center Suite 1300 00-113 Warsaw, Poland phone: +48 22 520 5700</p>

5. Information disclosure

Creating efficient information channels is crucial to maintain trustworthy and beneficial relationship with all influenced parties within the Project. Information disclosure creates the possibilities to cooperate with the local communities, exchange knowledge and maximise profit for all interested parties. At the same time, it includes implementation of tools allowing stakeholders for an effective dialogue with those responsible for Project development. Disclosure of information will take place based on legal requirements binding for the Project, as well as on the basis of requirements of the Project's Lender(s).

Any materials related to the Goliat PV will be disseminated by Mashav Hama LLC on Project's website (website 2) which serves as the primary source of information about the Project. The disclosed information will include a Non-Technical Summary of the Project, the SEP and a Grievance Mechanism (GM) (Chapter 7). The website will be updated on a regular basis. Above-mentioned documents will be also available at info point set in relevant Municipal Office.

Mashav Hama LLC will carry out communication activities in the local media, delivering reliable information and expert materials, if necessary. Furthermore, the documents such as the EIA report and the ED are available at the Potęgowo Municipal Office and will be made available at the request of an interested party in accordance with the provisions of Polish law.

Communication with administrative stakeholders will take place on the basis of formal correspondence, meetings summarized by notes and e-mail and telephone communication. The Project will also provide environmental information by submitting Reports in accordance with legal requirements.

The provision of information to NGOs will take place in response to their direct inquiry about the Project.

Transfer of information on Project implementation to the Lender(s) will be carried out through an annual report.

6. Stakeholder engagement program

Communication with stakeholders will continue throughout every phase of the Project. The consultation method and its nature depend on the target group. Consultation activities will be the responsibility of the Project Manager.

Below (Table 6.1) is an indication of the consultation activities that Mashav Hama LLC will undertake as part of its stakeholder engagement plan.

Table 6.1 Stakeholder engagement program

No.	Stakeholder	Consultation method	Consultation period	Responsibility for carrying out the activities
1. Communities and individuals				
1.1	Residents of Potęgowo and Damnica, Municipalities	The Project's website Grievance Mechanism form	Continuously, during pre-construction, construction and operation	Project Manager Municipal authorities
1.2	The landowners of the plots on which the project is located, i.e. owners of the land where panels, road infrastructure and cable connection are located	Direct contacts initiated by residents		
1.3	Employees of the Company and contractors of the civil works and PV operations	Meetings, e-mail and information boards	Continuously, during pre-construction, construction and operation	Project Manager
2. Distribution System Operator				
2.1	Distribution System Operator	E-mail and telephone correspondence Meetings	On as needed basis, during pre-construction, construction and operation	Project Manager
3. Administrative users				

No.	Stakeholder	Consultation method	Consultation period	Responsibility for carrying out the activities	
3.1	Ministry of Economic Development and Technology	Keeping formal correspondence Exchange of documentation and correspondence related to the Project	As required by administrative procedures	Project Manager	
3.2	Ministry of Climate and Environment				
3.3	Voivodship Offices				
3.4	Energy Regulatory Office				
3.5	General Directorate for Environmental Protection	Monitoring reports E-mail and telephone correspondence Meetings	Pre-construction and during construction and operation phase	Project Manager Environmental Specialist	
3.6	Regional Directorates for Environmental Protection				
3.7	National Labour Inspectorate				
3.8	Building Control Inspectorate	Consultations, exchange of documentation and correspondence related to the Project	Pre-construction and during construction and operation phase	Project Manager	
3.9	District Building Inspector				
3.10	Regional Sanitary and Epidemiological Station		Continuous process - in accordance with administrative procedures and legal requirements		
3.11	District Sanitary and Epidemiological Station				
3.12	Voivodship Monuments Conservators				
3.13	Voivodship Marshal				
3.14	Local government administration				
3.15	Police				

No.	Stakeholder	Consultation method	Consultation period	Responsibility for carrying out the activities
3.16	Fire Department			
4. NGOs				
4.1	National and local environmental organisations and organisations working to protect avifauna and chiropterofauna	Website Answers to direct questions or Grievance Mechanism Forms	Pre-construction and during construction and operation phase	Project Manager Environmental Specialist
5. Media				
5.1	Local media	Ongoing contact with the media Media monitoring	On a regular basis, during pre-construction, construction and operation phase If necessary	Project Manager
6. Lender(s)				
6.1	International Financial Institutions	Consultations – exchange of information, documentation and correspondence related to the Project	Continuous process – according to the Contract provisions	Project Manager

7. Grievance Mechanism

A GM will be launched for the communities both in Polish and English. It consists of a possibility to report complaints using an online form (Table 7.1) available on the Project website (website 2) or in a paper, which will be available at the Potęgowo Municipality Office during office hours. The authority of the municipality will be informed and instructed about the GM and where to submit complaints.

All inquiries will be considered when submitted using the form mentioned above. Grievance may be submitted anonymously, but the form will include the option to enter the sender's name and contact details. In situations where the complaint concerns unethical issues, crimes or corruption, the reported issue will be investigated and, if necessary, forwarded to the relevant state authorities for further investigation.

Any report that meets the formal requirements will be dealt with within 21 working days. However, in particularly complex cases, the processing and response time may be extended. In this case, the parties concerned will be notified by email or post. A response will be provided using the same form of communication used in the application. If the grievance requires it, community engagement activities such as open consultations, distribution of leaflets and brochures written in plain language, or sending notifications in the form of letters/e-mails/online will be specified.

All complaints will be registered immediately in the Grievance Tracker. Each stage of the complaints process will be appropriately recorded in it. The tracker will be updated and available to those communicating with stakeholders. It will contain information on how the complaint was made, the date the complaint was made, the action taken to resolve it, the date the resolution of the complaint was communicated and whether it was resolved and, if not, an explanation as to why the complaint could not be resolved.

All grievances will be directed to the Stakeholder Coordinators:

Project Manager:

Ms. Małgorzata Adamczyk

Phone: +48 571 092 738

e-mail: malgorzata.adamczyk@mashavenergia.com

Project Manager:

Mr. Grzegorz Borowiecki

Phone: +48 695 666 516

e-mail: grzegorz.borowiecki@mashavenergia.com

Table 7.1 Grievance Mechanism form

Case number (to be completed by the administrator):	
Full Name (Leave this section blank if you would like to submit anonymously)	
Contact information (Please mark how you wish to be contacted - telephone, e-mail)	<input type="checkbox"/> By telephone: ----- ----- <input type="checkbox"/> By e-mail: ----- -----
Description of concern, incident or grievance, e.g.: <ul style="list-style-type: none">• what is your concern / grievance,• what happened,• where did it happen,• who did it happen to,• what is the result of the problem	

Case number (to be completed by the administrator):	
Date of concern / incident / grievance	<input type="checkbox"/> One-time incident / grievance (date _____) <input type="checkbox"/> Happened more than once (how many times: _____) <input type="checkbox"/> Ongoing (currently experiencing problem)
What would you like to see happen to resolve the problem?	

8. Monitoring, resources and responsibility

Implementation of the SEP will be monitored by Project Management at Mashav Hama LLC. This monitoring will be carried out through the following activities:

- keeping a record of grievances received in the form of a Grievance Tracker (Chapter 7);
- if necessary, provide meetings with the local community along with keeping records of documentation from these meetings;
- keeping records of the Project's activities in the local press, national news media, radio, television, and social media;
- media monitoring of press, radio and television stories relevant to the Project;
- other as relevant.

The gathered records will serve as a tool for analysing individual stakeholders, stakeholder engagement and as documentation for Lender(s). Trends in any stakeholder feedback will be analysed to determine if there are any re-occurring themes that might require additional management actions in order to address them. Regarding the GM, efficiency of the grievance process, i.e. total number of complaints received so far, number of complaints resolved, number of complaints unresolved, number of recurring complaints recorded, number of

emerging issues, number of unresolved complaints currently under investigation, will be assessed.

SEP will be implemented by the employees of Mashav Hama LLC using its resources or with the help of external consultants. The persons responsible for the implementation of the plan are the Project Managers – Mrs. Małgorzata Adamczyk and Mr. Grzegorz Borowiecki.

9. Actions schedule

The following table (Table 9.1) provides a framework for the SEP implementation.

Table 9.1 Framework schedule for the SEP implementation

No.	Activity	Period	Responsibility	Reported to	Explanation
1.	Disclosure of SEP and GM on the Project's website	Before construction Q1 of 2025	The Company Resources	Lender(s)	Provision of PR 10 (EBRD 2023a)
2.	Establishment of the information points at the municipality	Before construction	The Company Resources	Lender(s)	Provision of PR 10 (EBRD 2023a)
3.	Submission of reports on Project's environmental and social performance	During construction and operation – once a year	The Company Resources	Lender(s)	Provision of PR 1 and 10 (EBRD 2023a and b) regarding the reporting to the Lender(s) on the Environmental, Social, Health and Safety matters and compliance

10. Bibliography

LEGAL ACTS

1. The Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws. 2008 No. 199 item 1227)
2. 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
3. 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

LITERATURE

1. EBRD 2023a. Guidance note. EBRD Performance Requirement 10: Information disclosure and stakeholder engagement, 76 pp.
2. EBRD 2023b. Guidance note. EBRD Performance Requirement 1: Assessment and management of environmental and social risks and impacts, 21 pp.

WEBSITES

Website 1 – <https://bdl.stat.gov.pl/bdl/dane/teryt/tablica> – accessed November 2024

Website 2 – <https://mashavenergia.com/> – accessed November 2024