

STAKEHOLDER ENGAGEMENT PLAN – “Augstkalni” wind park

1. INTRODUCTION

The “Augstkalni” wind park project, developed by SIA WPR 2 is located in Smiltene Municipality, Drusti, and Launkalne parishes. Approved by the State Environmental Monitoring Bureau in October 2023, it covers 2,906.35 hectares, approximately 11 km south of Smiltene town. The project plans to construct up to 16 wind turbines with a total capacity of up to 112 MW, generating 512–562 GWh annually, with recorded average wind speeds of 8.4 m/s at 200 meters.

Aligned with Smiltene Municipality's sustainable development goals, this project supports renewable energy growth while addressing environmental and community concerns. The environmental impact assessment highlights the project's contribution to renewable energy and climate change mitigation. The wind park's operation will produce relatively small emissions in its life cycle, significantly reducing reliance on fossil fuels and displacing substantial CO₂ emissions annually in the Latvian energy system.

The “Augstkalni” wind park is classified as a Category C high-risk project under Latvian civil protection regulations due to its total energy capacity exceeding 100 MW. This designation necessitates the preparation of a detailed Civil Protection Plan, addressing potential hazards such as accidents, fire, or extreme weather events.

Based on the EIA, the “Augstkalni” wind park is classified as a Category B project under the IFC framework, given that its moderate, site-specific environmental and social impacts are manageable through established mitigation measures.

The decision No. 5-02/13/2022 of the State Environmental Monitoring Bureau (SEMB) regarding the application of the EIA procedure for the activity proposed by SIA WPR 2– the construction of a wind park in Smiltene Municipality – was issued on 23 March 2022.

On 23 February 2022, the Smiltene Municipality Council issued a decision regarding the compliance of the proposed activity to establish the “Augstkalni” wind park in Smiltene Municipality with the Sustainable Development Strategy and Development Programme. To specify the conditions for constructing wind turbines within the study area, a local (land use) plan for the wind park “Augstkalni” was developed and approved by the Smiltene Municipality Council with Decision No. 189 dated 31 May 2023 “On the Approval of the Local Plan for the Wind park ‘Augstkalni’ in Smiltene Municipality and the Issuance of Binding Regulations.”

On 27 June 2022, the State Environmental Monitoring Bureau issued Programme No. 5-03/18/2022 for the EIA of the “Augstkalni” wind park. The programme was developed in accordance with Sections 16 and 17 of the “Law on Environmental Impact Assessment” and Cabinet of Ministers Regulation No. 18 of 13 January 2015 “Procedure for Assessing the Environmental Impact of Proposed Activities and Approving the Proposed Activity.” Environmental Impact Assessment was prepared by the environmental consulting company SIA “Estonian, Latvian & Lithuanian Environment”.

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The initial public consultation was held from 13 May to 6 June 2022. The consultation meeting for the proposed action took place remotely due to Covid-19 regulations, as outlined in the Law on the Management of the Spread of Covid-19 Infection (Latvijas Vēstnesis, Issue 110A), which was effective from 9 June 2020 and repealed on 1 January 2024. This law allowed the Cabinet of Ministers to impose gathering restrictions, including limitations on indoor and outdoor public events, to ensure epidemiological safety in the event of the spread or threat of Covid-19 infection. The public consultation on the EIA report took place from 9 February to 17 March 2023. The public consultation meeting was held on 28 February 2023.

As a Category C high-risk facility with a capacity exceeding 100 MW, the project requires a Civil Protection Plan, as mandated by Latvian law. This plan will address emergency preparedness and disaster management. Additional permits for the construction and operational phases, including forestry clearance and infrastructure development, will be obtained during the detailed planning permission process.

The project implementation can be divided into several stages including development, construction and operations phase. The development phase has been largely completed and involved identification of location of the future wind park, reaching of agreements with landowners, planning and EIA. Public consultations were organised to engage the local community and stakeholders. The development phase can be considered completed when all permits are received (see more details in the next chapters of this document).

The 2.5-year construction will include modern infrastructure, such as a 110 kV substation and power lines integrated with existing roadways to minimize disruption. With environmental safeguards at its core, the project is designed to mitigate impacts on local biodiversity, habitats, noise, and visual aesthetics, ensuring compliance with regulations. At the end of its lifecycle, turbines will either be decommissioned or upgraded, with materials recycled or reused. The "Augstkalni" wind park is expected to be operational for 35 years.

This Stakeholders Engagement Plan ("SEP") aims to identify the project's stakeholders and establish rules for managing the exchange of information between SIA WPR 2 and its stakeholders. The SEP is designed to reflect specific engagement activities during the project's lifecycle targeting different stakeholder groups, identifying information to be disclosed and means of communication and engagement as well as responsible parties.

2. LEGAL REQUIREMENTS AND STANDARDS FOR PUBLIC CONSULTATION

According to the regulations in force in the Republic of Latvia, public consultations are required as part of the development process, including planning of wind parks. These issues are regulated by Law on Environmental Impact Assessment adopted in 14 October 1998 (hereinafter – Law on EIA), which is harmonised with the European Union legislation (EIA directive). According to the Law on EIA, the public has the right to obtain the information and to participate in the decision-making process on the EIA. Public consultations are obligatory for projects, which require an environmental impact assessment procedure. Law on EIA requires the following public engagement activities:

- Organisation of initial public consultation allowing the public and stakeholders to express their opinions on the potential environmental impacts of the proposed activity at an early stage of the EIA process. The scope of information to be disclosed in the notice should include information about the proposed activity, its potential impact, the location and time when the public can review relevant EIA documents and submit comments. The notice must be published in at least one local newspaper and on the website (the project's developer's website and the municipality's website). Additionally the developer is obliged to

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individually notify property owners or managers of those properties bordering the project area. Upon request from the State Environmental Monitoring Bureau or the municipality, the developer must organise an initial public consultation meeting. The main purpose of such meeting is to introduce to the public the proposed activity, address questions and collect general feedback. The period for initial consultation lasts at least 20 days from the date of the notice publication, during which any individuals may submit written proposals regarding the planned activity.

- Public consultation aimed at presentation of the EIA report. A notice must be published about the availability of the report and planned public consultation meeting in at least one local newspaper and on the project developer's website. The printed version of the EIA report must also be available in physical location (premises of municipality or other publicly accessible venues). The total duration of the public consultation of the EIA report is at least 30 days from the date the notice is published in the newspaper. During this consultation period, the public can review the report and other related documents and submit proposals in writing. The results of the public consultation are summarised and incorporated in the updated EIA report.
- The competent authority (State Environmental Monitoring Bureau) is also obliged to make available to the public the opinions, resolutions and decisions issued during the EIA procedure, as well as to make available the environmental documentation produced during the procedure. Such information is available on the competent authority's website.

According to the national regulations, information to public shall also be disclosed during the construction process. The Construction Law (adopted on 9 July 2013) sets up the requirements on informing the public. The construction commissioning party is obliged to inform the public regarding the received construction permit within 5 days by installing an informative board on the plot of land on which construction is permitted. Apart from that, information to owners of immovable properties, that are adjacent to the plot of land on which construction is permitted, shall be submitted in writing.

A new regulation on Wind Power Plant Payment Procedure for Local Community Development came into force from 30 August 2024. It mandates the wind energy producers to annually contribute to the development local communities. In accordance with the procedures of the regulation, the wind energy producers are required to pay €2,500 per MW of installed capacity for each wind turbine. The payments are to be paid to the local municipality where the wind turbine is located by 1st March of each calendar year. These community payments are split between an administration of the respective municipality and households located in the vicinity of the wind park. As stipulated in the legal act, households situated within 2 km radius of a wind turbine are eligible for the community payments. The share between the respective municipality and the community is 50% each. The community share is proportionally divided to the households identified and payments are transferred to the natural persons, who hold registered ownership rights, by 1st of June. The municipality's share is credited to the municipal budget revenues. However, the 50-50% share can be adjusted as the legal act also foresees that community payments allocated to individual households cannot be less one minimum monthly salary and more than three minimum monthly salaries approved for the respective year in the country. In any case, the administering municipality shall receive not less than 10% of the total community payment. The respective municipalities are responsible for identifying eligible households within their jurisdiction and coordinating with the neighbouring municipalities, if the eligible area extends beyond the administrative boundaries of the municipality. The municipality can use the revenues collected from the community payment for the following purposes: promotion of energy efficiency measures, in particular, related to housing, environmental protection measures, protection and management of specially protected natural areas, habitats, species and biotopes, restoration and maintenance of municipal road infrastructure, management, preservation and improvement of cultural and

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historical sites as well as natural values and areas. The municipalities are obliged to publish report on their official websites about the received payments and their distribution by 15 July of each calendar year.

3. SUMMARY OF ACTIVITIES RELATED TO STAKEHOLDER ENGAGEMENT TO DATE

3.1. Previous activities

Following good international practice and national legal requirements, stakeholder engagement is an ongoing process, which starts at an early phase of the project planning. Therefore, the initial activities implemented by the SIA WPR 2 were focused on identification of project stakeholders and planning of engagement activities. To ensure timely public disclosure of the project related information and enable meaningful consultation with stakeholders, the requirements of the national legislation of the Republic of Latvia were closely followed. Stakeholder engagement activities undertaken so far in the project have focused on the following areas:

- communication with landowners, which started at an early phase of the project in 2021. Since 2021, SIA WPR 2 has been negotiating with the landowner on the agreements concerning the right to use the land and signing the agreements related to the use of land. In the following years the signed contracts for building of the wind turbines and access roads and cables, including construction of the 110kV substation. During these years SIA WPR2 on a regular basis held negotiation meetings/public information meetings with land owners;
- communication with the authorities and with the public during the environmental impact assessment procedure (see below);
- communication with the authorities during the procedure to issue a building permit;
- communication with local authorities during the procedure to adopt the local land use plan for the project area;
- contact with grid operator during the negotiations on the distribution network;
- Public consultation as part of the Environmental impact assessment permitting process, including key stakeholders as required by the Law on EIA.

As a part of the EIA process, the initial public consultation took place from 13 May 2022 to 6 June 2022. Following the legal requirements, a notice about the planned activity was published on 13 May 2022 in the newspapers "Druva", "Smiltenes Novads Pašvaldības Vēstis", and "Ziemeļlatvija". Information was additionally posted on the websites www.smiltenesnovads.lv, www.environment.lv, and www.vpvb.gov.lv. Owners (managers) of immovable properties bordering the project site were also individually notified about the planned activity.

The initial public consultation meeting was held online as a video conference on 26 May 2022 at 6 pm. In total, 44 participants attended the meeting. The main inquiries from participants were related to the criteria for selecting the project site, improvements of rural roads, planned distance from wind turbines to the residential buildings. The meeting participants were concerned about the impact of the proposed wind farm on wildlife, residential buildings and forest fires. The participants were also interested in the involvement of ornithologists and bat experts into the environmental impact assessment process, the expected commencement of the wind park operation, the experience of the project developers and planned collaboration with local authorities. During the initial public consultation, several comments were received from members of the public, mainly expressing concern about insufficient assessment of impacts on property values, the landscape, the quality of life, natural assets and human health as well as information about new construction projects.

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To ensure broad engagement of stakeholders during the preparation of the EIA Report, SIA WPR 2 organised three working group meetings in the Launkalne and Drusti parishes of the Smiltene municipality that were not required by the law, but was meant to have further and more comprehensive engagement with the local community. Availability of sectoral experts was ensured at those meetings to address various questions from residents of the parishes:

- The first working group meeting was held on 14 July 2022 with a focus on the planning and layout of the wind park. During the meeting, detailed information was provided from the project developers about conditions for wind turbine location, possible turbine models, planned location of access roads, the land plots required for the wind park, installation of the electricity cable line and other aspects of the project.
- The second working group meeting took place on 17 August 2022 with the aim to discuss impacts of the wind parks to nature, key considerations for the planning of wind parks and potential impacts on the natural assets.
- The third meeting was held on 12 January 2023. It focused on discussions about potential impact of the wind park on the public health and safety and residents were especially interested in noise and shadow flickering effects, turbine models and possible measures to mitigate negative impacts.

All proposals received during the meetings were evaluated and reflected when preparing EIA Report.

The decision No. 5-02/13/2022 of the State Environmental Monitoring Bureau (SEMB) regarding the application of the EIA procedure for the activity proposed by SIA WPR 2– the construction of a wind park in Smiltene Municipality – was issued on 23 March 2022.

On 23 February 2022, the Smiltene Municipality Council issued a decision regarding the compliance of the proposed activity of establishment of the "Augstkalni" wind park in Smiltene Municipality with the Sustainable Development Strategy and Development Programme.

Following the legal requirements, the main public consultations as required by the law on EIA were held during the period from 9 January 2023 to 17 March 2023, when the public could submit their comments. The public consultation meeting was organised remotely on 28 February 2023 at 5 pm. The Annex 10 of the EIA Report provides a detailed overview of the public consultations performed. Meanwhile, Annex 11 of the EIA Report contains all proposals and questions received during this public consultation process as well as a summary of responses to those proposals and questions along with an explanation how they were considered in the updated EIA Report.

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Competent authority, i.e. State Environmental Monitoring Bureau guarantees public participation in the process aimed at obtaining the above mentioned decision. Official notification about the issued EIA decision was published by the competent authority on the official website¹ on 3 June 2023.

On 04 October 2023, the State Environmental Monitoring Bureau issued an opinion on the Environmental Impact Assessment Report for the construction of the "Augstkalni" wind farm in Drusti and Launkalne Parishes, Smiltene Municipality.

The abovementioned decision provides conditions for minimising potential negative impact on the environment. It includes preparation of the Birds and Bats Monitoring Programme. The bat monitoring survey will be conducted during the first and second years following the commencement of wind turbine operations. The monitoring methodology, tailored to the specifics of the site, will be developed and the surveys conducted by bat experts, which are certified by the Nature Conservation Agency (hereinafter – NCA). A detailed birds monitoring programme will be developed prior to the start of construction and bird monitoring must begin one year before the start of construction. It will continue during the construction phase and the first five years during the operational phase. The programmes must be approved by the Nature Conservation Agency. The monitoring results for the first two years of the wind park operation must be submitted to the NCA biannually, while in the subsequent years, the reports should be submitted to the NCA annually. Based on the monitoring results obtained, additional mitigation or compensation measures may have to be selected and applied. The need for applying additional measures may be determined either by experts conducting birds/bats surveys or by the NCA.

3.2. Residents survey

Additionally, as a part of the EIA public consultation process, all interested parties were invited to complete a resident survey, which could be accessed through the developer's website at www.environment.lv. The survey was an important tool to gauge the public opinion on the implementation of the proposed wind farm development project. It was conducted during the same period of public consultation as for the EIA report, i.e., from 9 February 2023 to 17 March 2023. The aim of the survey was to promote public participation, assess the level of public awareness, gather opinions on the planned activity, and identify the environmental aspects that the residents are

¹ <https://www.vpzb.gov.lv/lv/media/5349/download?attachment>

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most concerned about in relation to the project implementation. Information about this survey was published on the website of Smiltene Municipality and SIA "Estonian, Latvian & Lithuanian Environment".

Category	Subcategory	Percentage
Municipality of Residence	Smiltene Municipality	85%
	- Launkalne Parish	32%
	- Drusti Parish	58%
	- Other parts	10%
	Cēsis Municipality	6%
	Gulbene Municipality	2.50%
	Valka Municipality	2.20%
Age Distribution	Rīga	2.20%
	Other municipalities	<1%
	Age 41-50	31%
	Age 31-40	29%
	Age 51-60	20%
	Age 18-30	9%
	Age 61-70	7%
Education Level	Age <18	2%
	Age >70	2%
	Higher education	76%
	Secondary vocational education	16%
Occupation	Secondary education	6%
	Basic education	2%
	Employees	32%
	Self-employed	20%
	Entrepreneurs	20%
	Homemakers	8%
	School pupils/students	8%
	Pensioners	5%
Household Size	Unemployed	4%
	Other occupations	4%
	5+ members	44%
	4 members	26%
	3 members	16%
	1-2 members	14%

In total, 279 respondents participated in the survey, from which 85% were resident in Smiltene Municipality (32% in Launkalne Parish, 58% in Drusti Parish, and 10% in other parts of the municipality), 6% in Cēsis Municipality, 2.5% in Gulbene Municipality, 2.2% in Valka Municipality, 2.2% in Rīga, and less than 1% in Alūksne, Ikšķile, Madona, Mārupe, Sigulda, and Valmiera municipalities.

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The most active participants were from the 41–50 age group (31%), followed by the 31–40 age group (29%). Residents aged 51–60 also participated actively (20%). Lower levels of participation were observed among respondents aged 18–30 (9%) and 61–70 (7%). A small proportion of respondents represented the under-18 (2%) and over-70 (2%) age groups.

Of all respondents, 76% indicated they had a higher education, 16% had completed secondary vocational education, 6% had a secondary education, and 2% reported having a basic education. The majority of respondents were employees (32%), self-employed individuals (20%), or entrepreneurs (20%). A significant number of respondents identified as homemakers (8%) or school pupils/students (8%). Smaller numbers of respondents were pensioners (5%) and unemployed (4%), while 4% indicated other occupations.

A total of 44% of respondents lived in households with five or more members, 26% in households with four members, 16% in households with three members, and 14% in households with one or two members.

As part of the survey, residents were asked to express their opinions on various types of electricity generation. When asked which types of electricity generation they would support the development of in Latvia (see Figure 1), the majority expressed support for the construction of hydroelectric power stations on the River Daugava (90% supportive or somewhat supportive) and biomass-fired cogeneration plants (87% supportive or somewhat supportive). Respondents also showed positive attitudes towards the construction of small hydroelectric power plants (69%) and solar panel parks (61%).

Residents largely expressed negative attitudes towards activities such as the construction of nuclear power plants (55%), coal-fired cogeneration plants (63%), and gas-fired cogeneration plants (56%). Opinions on wind park construction were split into two opposing groups: 52% of respondents were supportive or somewhat supportive (51% supportive, 1% somewhat supportive), while 47% were somewhat unsupportive or unsupportive (3% somewhat unsupportive, 44% unsupportive).

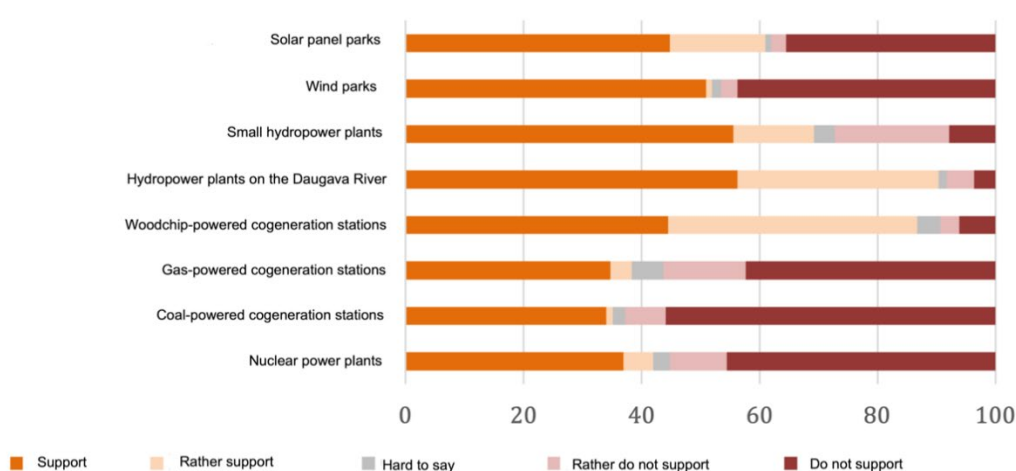


Figure 1. Respondents' opinion on the development of various electricity generation methods in Latvia (n = 279)

In response to the question about the environmental impact of various electricity generation methods, as perceived by the respondents (see Figure 2), the methods identified as having little to no environmental impact

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were the construction of biomass cogeneration plants (88% of respondents believed the impact would be minor or negligible), hydroelectric power plants on the Daugava River (81%), and small hydroelectric power plants (70%). Approximately 60% of respondents indicated that the construction of nuclear power plants, solar panel parks, and gas-fired cogeneration plants would have a minor or negligible impact. In contrast, 35% of respondents viewed the environmental impact of coal-fired cogeneration plants as minor or negligible. Opinions were divided regarding the construction of wind farms: 52% of respondents believed the impact would be minor or negligible, while 48% considered the impact to be significant or very significant.

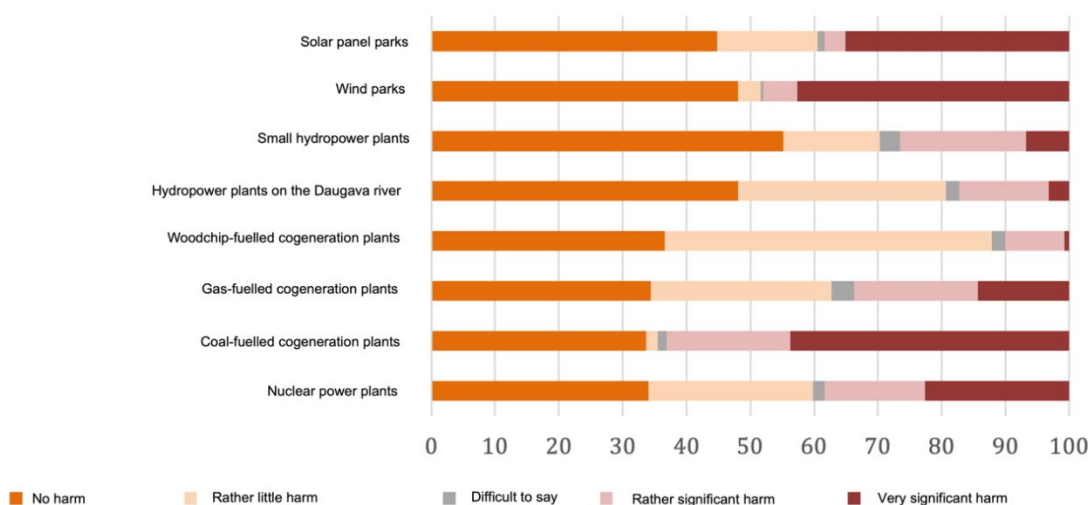


Figure 2. Respondents' opinions on the environmental harm caused by various electricity generation methods (n = 279)

In response to the question of which renewable energy resource would be most suitable for development in Latvia, 51% of respondents indicated wind energy, 31% chose biomass energy, 12% selected hydropower, and 4% preferred solar energy. Approximately 2% of respondents suggested other options, citing examples such as nuclear energy, hydrogen utilisation, or the development of new, yet-to-be-introduced technologies. Overall, around 51% of respondents support the construction of wind farms, 1% somewhat support it, 3% somewhat oppose it, and 45% oppose this form of electricity generation.

When asked whether it is more important to harness wind energy, even if it means seeing wind turbines in the landscape, or to preserve the landscape at the expense of wind energy production, the majority of respondents (51%) favoured wind energy production, even if it meant wind turbines would be visible in the landscape.

The survey also assessed the public's awareness of plans to construct a wind farm in Smiltene Municipality. Overall, the results indicate that information has reached a broad audience, as 91% of residents reported being aware of the plans, while 7% stated they were partially informed about the company's intended activities. Only 2% of respondents indicated that they were not informed about the proposed development. According to the survey results, 70% of respondents obtained information about the proposed wind farm from online resources, 32% from the local government (including the local government's website), 25% from relatives, acquaintances, or neighbours, 22% from newspapers, radio, or television, and 17% from the project initiators or evaluation experts. Overall, 39% of respondents stated that they had read the Environmental Impact Assessment (EIA) Report, 48% had read the summary of the report, 24.5% had participated in public discussions about the report, and 14.5% had not reviewed either the EIA Report or its summary.

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One of the key sections of the survey focused on identifying the aspects shaping respondents' opinions. When asked about the potential impact of the proposed construction in Smiltene Municipality on various aspects (see Figure 3), a wide range of opinions was evident among residents. The greatest negative or somewhat negative impacts were associated with anticipated effects on tourism and recreation opportunities (46.2% of respondents indicated a negative or somewhat negative impact), the natural environment in the surrounding area (49.8%), the value of cultural and historical heritage (43.3%), the surrounding landscape (50.5%), and human health (47.3%).

Conversely, the most significant positive or somewhat positive impacts were expected in terms of Latvia's energy independence (53.4%), economic growth in the area (51.6%), electricity prices (49.8%), the quality of transport infrastructure (45.9%), and property values (54.8%). However, it should be noted that for some questions, the margin of responses was small (e.g., the question on the impact on transport infrastructure), and for others, the response option "No impact" received relatively high results (e.g., 38% of respondents indicated no impact on human health, while 36.9% selected no impact on the value of cultural and historical heritage).

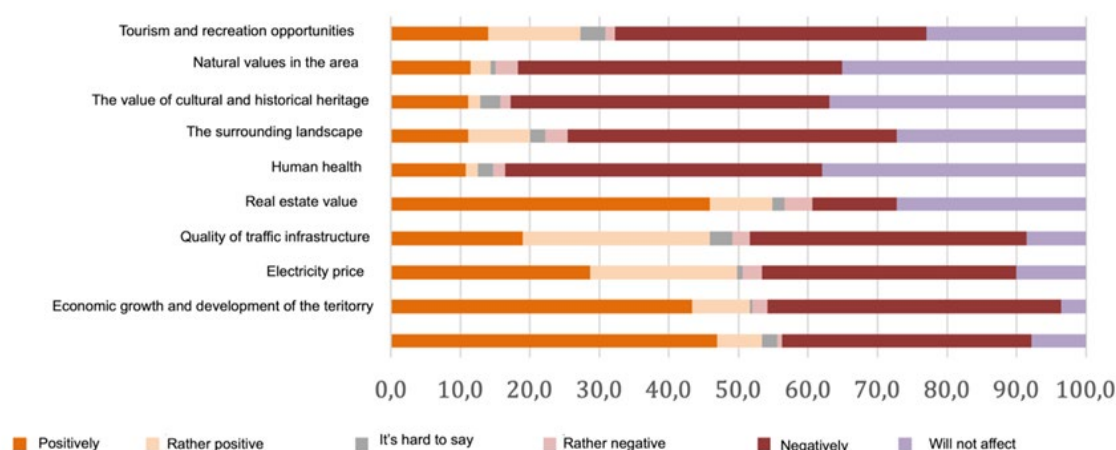


Figure 3. Respondents' opinions on the planned construction of the wind park in Smiltene Municipality (n = 279)

In response to the question regarding concerns about the impacts associated with the planned operation of the wind power plant (see Figure 4), approximately 41-47% of respondents indicated that all the specified impacts caused concern, making up nearly half of the responses. About 1-6% of respondents stated that it was difficult to say whether the respective impacts caused concern, while the remaining respondents indicated that the impacts either did not or were unlikely to cause concern.

When grouping respondents into those for whom the impacts caused or were likely to cause concern, and those for whom the impacts did not or were unlikely to cause concern, it became evident that opinions were split into two roughly equal groups.

Overall, the majority of residents expressed concern or likely concern about the predicted impacts on noise levels (48.4%), vibration levels (48.0%), shadow flicker (49.1%), and changes to the landscape (52.0%). In contrast, most residents did not or were unlikely to be concerned about the impacts on the reduction of cultural heritage value (50.2%), natural assets (50.2%), tourism and recreation opportunities (48.7%), road damage (54.1%), or the reduction of forest and/or agricultural land areas (49.1%).

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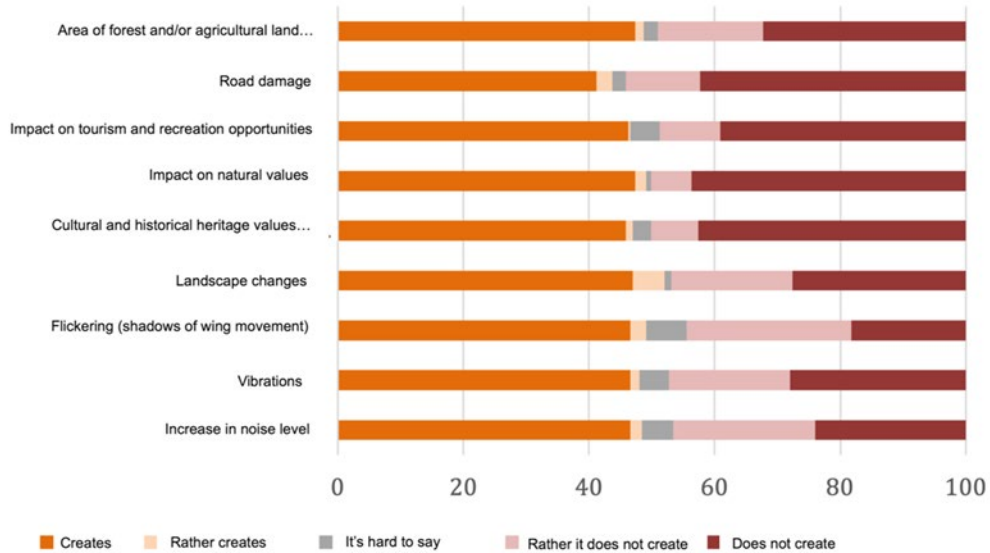


Figure 4. Respondents' concerns about the impact of the proposed activity (n = 279)

At the conclusion of the survey, residents were asked to indicate the extent to which they support the construction of wind power plants in Smiltene Municipality (see Figure 5). Overall, the majority of residents expressed support for the proposed activity—50.9% of respondents. Additionally, 0.7% of respondents stated that they somewhat support the proposal, 1.1% stated that they somewhat oppose it, and 47.3% of respondents indicated that they do not support the implementation of the proposed activity.

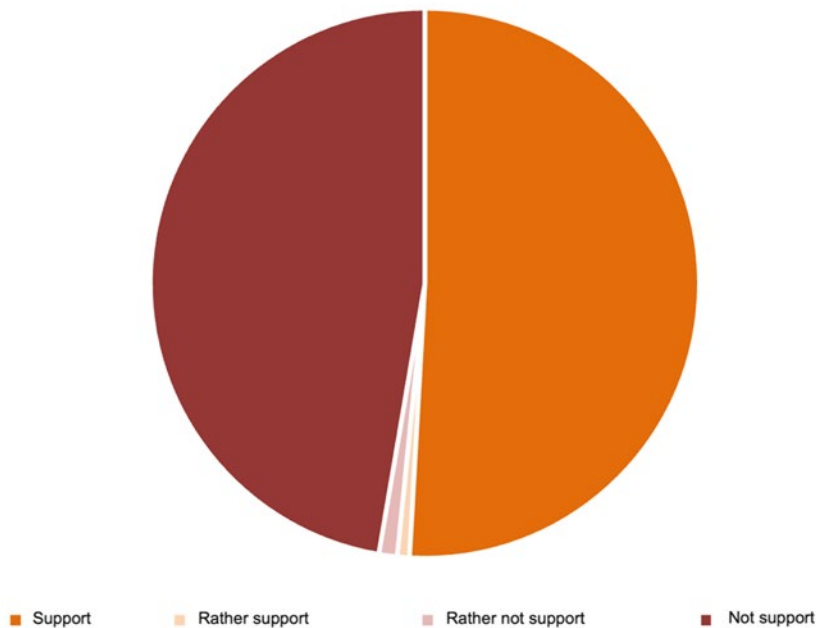


Figure 5. Respondents' opinions on the proposed activity (n = 279)

When asked why respondents supported the implementation of the envisaged action, the majority of citizens referred to economic independence and growth as the primary reason, as well as expressed support for the use of renewable energy, and the possibility of economic growth in the Smiltene region was often mentioned. Residents who do not support the implementation of the intended activity cite as their main arguments the negative impact on natural areas, natural values, as well as the negative impact on the landscape. In addition, many respondents are frustrated by the station's deployment near the respondents' own places of residence, as well as the small distance from populated areas.

As a last question, citizens were given the opportunity to make proposals or comments on the implementation of the proposed action. Most of the respondents who commented asked for a different area for the construction of the park, often mentioned the possibility of developing the wind farm in the marine area. One respondent made the proposal to install wind turbines on the side of the highway, where the resulting landscape and noise impacts would not lead to such drastic changes to the current situation. In addition, several citizens said it would be necessary to better inform the public about the intended activity, to educate the population with well-received but scientifically sound information about the latest research and experience related to the development of wind farms in different regions, which in the long term could reduce citizens' concerns and negative attitudes towards wind power generation.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder groups that may be affected by and/or are interested in the wind park "Augstkalni", as well as proposed communication methods and issues of interest and/or concern for each group, have been identified by SIA WPR 2 with assistance from consultants and are presented in Table 1 below.

Table 1. External and internal Project Stakeholders

Stakeholder group/Stakeholders	Type of Communication and Proposed Method	Issues of interest / concern
<i>External stakeholders</i>		
Owners and users of land acquired for Project components on a voluntary basis	Meetings (group or individual) Official correspondence Grievance mechanism	Contract management, payment terms Impacts Access to territory
Owners and users of non-acquired land that may be disturbed during construction	Meetings (group or individual) Grievance mechanism	Compensation for damages Construction timelines Construction / upgrading of access roads

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Stakeholder group/Stakeholders	Type of Communication and Proposed Method	Issues of interest / concern
General public, particularly community representatives and residents of Smiltene municipality Notes: - Focused engagement may be needed with households and others involved particularly affected by shadow flicker and noise, which will be determined when relevant impact assessments are completed. - Depending on the final selected route for transporting turbine components, additional villages may be added as stakeholders to the SEP.	Public hearings and / or consultation meetings Project website Municipal website and Media Grievance mechanism	Project benefits Environmental and social impacts Employment / procurement opportunities Transport and traffic impacts
National authorities, including permitting and enforcement bodies: The national authorities, responsible for developing sectorial policies of relevance to the project, national regulatory bodies, competent authorities granting permits and enforcing compliance with the national regulations throughout the project life cycle, including: - Ministry of Climate and Energy - Ministry of Economics - Ministry of Health - Ministry of Smart Administration and Regional Development - State Environmental Monitoring Bureau (Energy and environmental agency from 1 February 2025)	Official correspondence and meetings when necessary	Policy documents Location conditions / permits EIA application and permit

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Stakeholder group/Stakeholders	Type of Communication and Proposed Method	Issues of interest / concern
State Environmental Service		
Nature Conservation Agency	Official correspondence and meetings when necessary	Development and acceptance of bat and bird monitoring programmes Submission of monitoring results
State Fire and Rescue Service	Official correspondence and meetings when necessary	Approval/informing about the civil protection plan
National Heritage Board	Official correspondence and meetings when necessary	Coordination of activities during the construction phase to protect potential artifacts and historical sites
Latvian Air Traffic	Official correspondence and meetings when necessary	Coordination with regards to flight safety
Local/municipality authorities: Smiltene Municipality	Meetings Official correspondence	Building permits Project timeline and progress Construction / upgrading of access roads Project benefits Environmental and social impacts (collection of complaints) Approval of civil protection plan Management of obligatory payments Employment / procurement opportunities

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Stakeholder group/Stakeholders	Type of Communication and Proposed Method	Issues of interest / concern
		Transport and traffic impacts
Grid operator: • Augstsprieguma tīkls (AST)	Meetings Official correspondence	Connection to the grid
NGOs: Most active non-governmental organisations, who have direct interest in social and environmental aspects of the project and can influence the project directly or through public opinion	Official correspondence	Environmental and social impacts
Media	Official correspondence	Media coverage of project development Environmental and social aspects, complaints
<i>Internal stakeholders</i>		
Employees of the wind park owner	Direct notifications, announcement boards Office meetings Internal grievance mechanism for employees	Labour contracts Human Resources Policy Health and Safety procedures
Contractors, subcontractors, suppliers	Information in contracts Meetings and official correspondence	Worker grievance mechanism Worker Code of Conduct Health and safety at work Security Interaction with the community and Project Grievance Mechanism Environmental protection

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5. MAKING INFORMATION AVAILABLE

The purpose of providing information about the project is to support communication between stakeholders and the SIA WPR 2 and to increase the level of knowledge about the project, its impacts and benefits. At the same time, information disclosure includes implementation of tools allowing stakeholders for an effective dialogue with those responsible for project implementation.

Disclosure of information will comply with the legal requirements binding for the owner of the wind park. The nature of disclosed information will depend on the project's stage of development.

The main channel for information dissemination for wind park "Augstkalni" will be a dedicated website <https://www.augstkalnivejaparks.com/en>. The website will also include a complaint form. The website will be updated on a regular basis. In addition, SIA WPR 2 may, at its discretion, carry out communication activities in the local media in the context of the project.

In addition, stakeholders have access to the following information on public websites:

- EIA report;
- EIA decision available from the website of State Environmental Monitoring Bureau;
- Building permit available from the website of Building information System (during the construction phase);
- Reports about the received Local community payments from wind park published on the website of the municipality.

Link to these external documents and/or short summary of the available information will also be available on the project website.

The SIA WPR 2 will also provide information by submitting Birds and Bats monitoring reports to the Nature Conservation Agency in accordance with requirements stipulated in the EIA decision, as well through communication with municipality and State fire and rescue services in the context of Civil project planning and with National Heritage Board in the context of potential impact of cultural heritage and historic sites.

At the time of the construction, an information board will be erected at the project site in accordance with the national legal requirements.

The provision of information to NGOs and media will take place in response to their direct inquiry about the project and through the project website.

Information on the [project] will be reported to the lender through [an construction/operational report/ annual report].

6. STAKEHOLDER ENGAGEMENT PLAN

Communication with stakeholders has been conducted at the planning/design stage of the project and will continue during the construction and operation of the wind park. The consultation method will depend on the stakeholder group and the project stage at which it is conducted. Consultation activities will be the responsibility

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of a Community Liaison Officer (CLO), appointed by SIA WPR 2 and Community Liaison Coordinator (CLC), appointed by Taaleri.

The CLO will act in consultation with the company's management, when required. The CLO will be responsible for keeping the SEP updated, if necessary and report on its implementation, including any grievances raised, to the management. The CLO will maintain all records of communication with stakeholders. Contact details of the CLO will be made available to all local communities and residents adjacent to the project area, contractors and other relevant stakeholders.

The SEP will be implemented by the employees of SIA WPR 2 using its resources or with the help of external consultants. Responsibility for the implementation lies with CLO.

The following table provides a plan for the implementation of the SEP.

Table 2. Stakeholder engagement program implementation plan

Task	Deadline	Responsible	Indicative budget
Launching the project website and placing the complaints form on the aforementioned website.	Upon commencement of the construction works	CLO	<3000€
Development of communication activity log	Upon commencement of the construction works	CLO	<800€ (Taaleri Energia Operations Oy hourly rates apply)
Development of and submission of Birds/Bat/Owl monitoring programme to the Nature Conservation Agency	1 year prior commencement of construction works	CLO, certified bird and bat Experts, consultants	~20000€
Preparation and submission of annual monitoring reports to the Nature Conservation Agency	According to the deadlines defined in the monitoring programmes	CLO, certified bird and bat Experts, consultants	Bird monitoring: ~35000€ Bat monitoring ~10000-20000€
Erection of information board at the construction site	Within 5 days from receipt of the building permit	Construction company	No separate cost – responsibility of BOP contractor
Development and submission to the municipality and State fire	Prior commencement of the operation of the wind park	CLO, civil protection experts, WPR2	To be tendered

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and rescue service of the Civil protection plan			
Update and submission to the municipality and State fire and rescue service of the Civil protection plan	Annually	CLO, civil protection experts	<2000€ annually, unless there are changes in local regulation
National Heritage Board if any cultural heritage is discovered during construction	In chance of finding cultural heritage or the remains of soldiers who perished during military operations	CLO, subcontractor (building companies)	Depends on the type of finding and the necessary hours required for resolving the issue.
Update information of the amount paid to the Local communities in accordance to the national legislation and the use of funds as reported by the municipality. Public the information on the webpage	Annually, after July 15	Municipality, CLO	~500€ annually (Taaleri hourly rates apply)
Update project website on major development events and other news regarding the project	Regularly	CLO	During construction: ~200-300€ per month During operations: ~600-800€ annually (Taaleri hourly rates apply)
Maintain regular communication for landowners using the most appropriate for both parties channels (meetings, official correspondence or other)	Annually	CLO	~2000€ annually (Taaleri hourly rates apply)
Monitor complaints via established grievance mechanism	Constantly	CLC	(Taaleri hourly rates apply)
Update stakeholder communication log	Regularly (but at least once annually)	CLC	<800€ (Taaleri hourly rates apply)
Review and update SEP	Annually	CLO, CLC	<1000€

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			(Taaleri hourly rates apply)
Regular reports to owners	Monthly, quarterly, annually	SIA WPR2, CLO	(Taaleri Energia hourly rates apply)
Submission of reports to lenders	Annually	CLO	(Taaleri Energia hourly rates apply)

7. COMPLAINT SUBMISSION MECHANISM

SIA WPR 2 will launch a grievance mechanism for the project's internal and external stakeholders. The grievance mechanism shall be in line with the principles set out in the Taaleri Energia's Grievance Mechanism template, which states that all grievances (whether submitted through grievance form, telephone, e-mail, oral, etc.) will immediately be recorded in the Book of Grievances. The CLC will further:

- issue an acknowledgment of the receipt of the grievance to complainant in written form within 7 days from the receipt of the grievance
- review received complaints and analyse them in terms of prioritisation for resolution as soon as they are received. Concerns that require immediate actions will be brought to the Project Company and Taaleri Energia management's attention immediately
- investigate the issue and identify the resolution or, in consultation with the management, assign responsible person within the organisation
- communicate the proposed resolution to the complainant within 30 days of receiving the grievance and register complain as closed
- monitor and evaluate the corrective actions taken and report to the management on regular basis.

Each complaint shall be responded to within a 10 working days timeframe. If additional time is needed for the response, the stakeholder will be informed about the estimated response time, reason and the form of case handling. All grievances (whether submitted through grievance form, telephone, e-mail, oral, etc.) will immediately be recorded in the Book of Grievances. The CLC is responsible for managing received grievances and / or requests received. Submission of complaints shall be possible through the form (available both in Latvian and English), which will be available on the dedicated project website once live.. An example of the form is presented below.

The CLC for this project is Atte Ahti, atte.ahti@taaleri.com.

Case number (to be completed by the administrator):	
Name and surname	

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Contact information (possible to submit anonymously) Please select the method of contact with you	By letter By phone E-mail
Preferred correspondence language	Latvian/English/other (please state which)
- Description of the subject matter of the case or complaint subject matter of the case/complaint - Information on where the case happened - Information on people involved in the case - Information of consequences of the case	
Date of the event/occurrence of the subject matter /the complaint/manifestation of the case	One time event (date) The event happened more than once (how many times?) An ongoing event (problem currently being experienced)
What actions would provide a solution to the problem?	

The CLC will review received complaints and analyse them in terms of prioritisation for resolution as soon as they are received. Concerns that require immediate action will be brought to the management's attention immediately. The CLO will assess the issue and identify the resolution or, in consultation with the management, assign responsible person within the organisation. The CLO will monitor and evaluate the corrective actions taken in response to the resolution of complaints and report to the management on regular basis.

8. MONITORING

The stakeholder engagement plan will be monitored by CLO. This monitoring will be carried out through the following activities:

- keeping a record of complaints received. The records will include summary information on the timing and nature of the complaint, how it was submitted and how and when it was investigated;
- keeping records of meetings with the project's stakeholders. The records will contain information about the purpose and place of the meeting, number of participants, course of the meeting and arrangements made during the meeting.

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- keeping records of communication (formal correspondence letters, emails) with stakeholders.
- keeping records of the SIA WPR 2 activities in the local press, radio and television and in the national information media.
- Updating the list of stakeholders and the SEP, as required.

The special communications activity log will be created for recording the abovementioned aspects of on the annual based and allowing for year-to-year comparison.

EBRD IPAM complaints

EBRD's [Independent Project Accountability Mechanism](#) (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the bank. The IPAM provides an alternative way for submitting complaints regarding the project.