

Stakeholder Engagement Plan

Lithuanian Power Plant

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1 Introduction

1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) for the Lithuanian Power Plant (LPP), describing the information and communication plans, regarding operations and the current investment programme.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that LPP will adopt and those which will be used for the current modernisation programme.

The SEP will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary.

The specific objectives of the SEP are detailed below.

1.2 OBJECTIVES OF THE PLAN

The methods, procedures, policies and actions undertaken by LPP to inform stakeholders, in a timely manner, of the potential impacts of projects are the key subject of this document.

A level of stakeholder engagement has already taken place as part of the requirements of the Environmental Impact Assessment (hereafter EIA) of the project. Communication will continued as further planning and design activities are progressed and through the project implementation.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact LPP and ask to be included in the future information and communication. Furthermore, this document describes the way that any concerns or grievances will be handled by the company.

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

1.3 SCOPE OF THE PLAN

This document covers the following:

- Chapter 2 Modernisation programme and project description, location of the site and key environmental and social issues;
- Chapter 3 Public consultations and information disclosure requirements;
- Chapter 4 Identification of stakeholders and other affected parties;
- Chapter 5 Overview of previous LPP stakeholder engagement activities; and
- Chapter 6 Stakeholder engagement programme and methods of engagement and resources.
- Chapter 7 Grievance mechanism

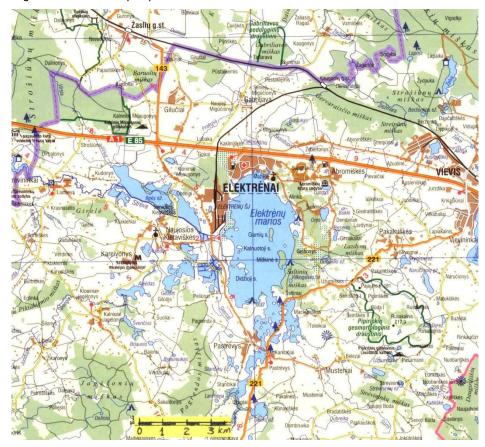
2 Project Description

2.1 OVERVIEW OF THE LITHIANIAN POWER PLANT

Location of the Site and Identification of Sensitive Sites

The LPP site is located within the locality of LPP city, which is situated approximately 50 km to the west of Vilnius. The site is located next to the Elektrenai Lagoon and the town of Elektrenai is located approximately two km away to the North East of the plant.

A general location map is provided below:



The Sanitary Protection Zone (SPZ) for electricity production facilities (as most recently agreed April 27th 2006) at LPP is set at a varying distance (corrected for the prevailing winds) from a minimum of 500 metres and up to 720 metres, as shown in the table below. There are no reported habitable houses located within the SPZ.

The standard zone for this type of facility is 500m and the corrected zones are shown below:

Direction	N	NE	E	SE	S	SW	W	NW
Standard zone (m)	500	500	500	500	500	500	500	500
Corrected zone (m)	640	720	600	500	500	500	500	680

There are no nature conservation sites or sensitive habitats within 2 kilometres of the site.

Production Activities

A summary of the key company and production activities are summarised in the table below.

Ownership	96% Government			
	4% private shareholders			
Employees	551 (as of July, 2009)			
Products	Electricity to the national grid			
	Heat to the local town 'Elektrena	i' via a district heating system.		
Current	8 gas or heavy fuel oil fired furna	ce, boiler and generator units.		
Operations	2 electrostatic precipitators and 2 flue gas desulphurisation plan serving Units 7 and 8.			
	HFO storage facility, including the strategic store for the Lithuania Government. Storage capacity of 320,000 tonnes of HFO.			
	Site landfill and effluent lagoons	and treatment facilities.		
Production	Current Thermal total capacity:	5,680 MW		
	Current electrical capacity:	1800 MW		
	Current efficiency:	Circa 31.6% aggregated		
Future	Closure of 2 no. units (Units 3 and 4).			
Operations	Development of a new Combined Cycle Gas Turbine (CCGT) unit of 400 – 440 MW electrical output and approximately 750 MW Thermal.			

INVESTMENT PLAN SUMMARY

Modernisation Programme

The main investment plans of the facility are:

- Finalise commissioning of the new Flue Gas Desulphurisation (FGD) and Electrostatic Precipitators (ESPs) systems on Units 7 and 8;
- Installation of a new 750 MW Thermal (400 440 MW electrical) Combined Cycle Gas Turbine (CCGT) power generation unit (termed Unit 9);
- Closure of the current Units 3 and 4.
- Closure and rehabilitation of the current high sulphur waste / fuel oil particulate landfill site and the surface run off / oil coolers condensate lagoons.

3 Public Consultation and Information Disclosure Requirements

3.1 LPP STRUCTURE AND MANAGEMENT

The LPP management structure has been provided as part of the EHSS review of the LPP site. There is a Legal and Human Resources Department and also a Technical (Engineering) Department which both have responsibilities for external stakeholder engagement. The Legal and HR Department consults with external bodies such as the Ministry of Social Security and Labour Safety and also the Unions. The Technical / Engineering department also communicates with the Ministry of Social Security and Labour Safety in regards to occupational health and safety requirements, but also the Local and National Environmental Inspectorate and the local municipality in regards to any public or local community communication.

The Site General Director is overall responsible for all Stakeholder engagement activity. For the CCGT project, the Finance Director also has specific communication planning responsibilities. The Chief of the Engineering Department and the Personnel Director are the primary daily interfaces for stakeholder engagement and there is also further delegated responsibility in the Environmental Officer, The Safety Officer and the Legal and HR Officer.

LPP has relationships with key stakeholders and groups at operational and sector level and continue to seek their contribution to the development of the LPP site development strategy and in regards to business operational policy.

3.2 THE REQUIREMENTS

Public consultations and information disclosure undertaken by LPP comply with the requirements of the legislation of Lithuania, best international practice, and with those described in requirements of the European Bank for Reconstruction and Development (EBRD).

National Legislation Requirements - EIA Consultation

LPP complied with national regulations on the public consultation for the proposed CCGT project and the requirements of the National Environmental Impact Assessment Legislation.

The EIA consultation was completed through the provision of official notices in the weekly national newspaper the 'Baltic Times', the daily national 'Lietuvos Rytas' and the regional weekly the 'Elektrenu Zinios'. Notices were also posted around Elektrenai Town and owners and users of neighbouring land plots were directly informed.

An open public meeting was also held on the 15th October 2007, in the main Conference Hall within the LPP. No participant from outside of LPP attended this session.

The EIA Report states that so far no public opinion had been officially expressed or recorded during the public consultation for the EIA.

The Head of the Local Environmental Inspectorate confirms that consultation and stakeholder engagement were undertaken as part of the EIA process for the new CCGT unit. The following key points were raise in reference to this consultation:

Regulatory bodies were consulted and did not express any significant concerns;

- The local community were consulted, through a public consultation meeting at the plant. It was commented that no-one attended this meeting from the local community;
- That the boaters and fisherman were consulted and expressed an interested in the temperature of the cooling water, although no concerns were expressed;
- No local wildlife groups were identified to consult.

General Stakeholder Communication Records Maintenance

LPP does not currently have a formalised procedure for the recording of key incoming or outgoing communication relevant to this process, but this is one of the actions that LPP will undertake in 2009.

LPP currently has a procedure for the recording of key incoming or outgoing communication relevant to this process. This procedure will be improved and formalised in 2009.

A communication records procedure will be developed which will log the key information provided to stakeholder and also the key incoming communication (i.e. general questions, complaints etc) to LPP, along with a summary of action taken.

As part of this communications procedure, LPP will record and update these ongoing stakeholder engagement activities on an ongoing basis.

Best International Practice

The key principles of effective engagement are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions, and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

4 Stakeholder Identification

4.1 IDENTIFICATION OF MAIN STAKEHOLDERS

Overview

This section of the document identifies interested parties i.e. stakeholders and others affected at a local, district and regional level.

Stakeholders could also be individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views.

LPP has undertaken an initiative to identify its key national stakeholders. In doing this the following definitions have been applied:

- Stakeholders: any person, group or organisation with a vested interest in the outcome of a body of work;
- **Key stakeholder**: any stakeholder with significant influence on or significantly impacted by, the work and where these interests and influence must be recognised if the work is to be successful:

There are partnerships and formal advisory arrangements and also less formal but important relationships with groups or individuals with a particular interest in the work LPP undertakes.

Stakeholders can be grouped into the following categories:

- National Government (96% ownership) and also the private shareholders (4% ownership)
- International
- Government (Lithuanian state / regional and local)
- Advisory/non-government
- Services / suppliers
- Clients
- Institutions (universities, think tanks, etc.)
- The energy industry
- Internal stakeholders (Employees, labour unions)
- General communities.
- Public groups nearby hospital, local schools
- The media.
- Gardening community "Klevas"

All the key stakeholders indentified are presented below. If you are not on the list and would like to be kept informed about the company and project, please contact Mr Sepetys (A.Sepetys@lelektrine.lt or +370 528 39533).

Key stakeholders and other key affected parties

Stakeholder Groups	Key Stakeholders	Summary of Specific interest
International	■ EBRD – London HQ	EHSS best practice, Equator Principles, IPPC BAT
	■ EBRD – Lithuania Branch Office / Ignalina International Decommissioning Support Fund EBRD Lithuania Office. Šeimyniškiu 1A. 4th Floor. LT-09312 Vilnius. Lithuania. Tel: +370 52 638 480. Fax:+370 52 638 481.	Environment and Social Action Plan responses as required.
	Commission of the European Union in Lithuania	
	Gedimino pr. 11, LT-01103 Vilnius E-mail: info@euro.lt Tel.: 8-5-2663771 Fax: 8-5-2663895	Progression on the upgrading on generation capacity and the replacement of the Nuclear Plant under the EU arrangements for Nuclear Safety.
Government (Lithuanian, state)	 Ministry of Environment of the Republic of Lithuania (Lietuvos Respublikos Aplinkos Ministerija) Juozapaviciaus g. 9 LT-2600 Vilnius Lithuania Tel. + 370 5 27 2 2029 Fax + 370 5 272 8020 Fire and Rescue Department under the Ministry of the Interior (Priešgaisrinės apsaugos 	National environmental policy
	ir gelbėjimo departamentas prie Vidaus reikalų ministerijos) Svitrigailos g. 18 LT-03223 Vilnius Lithuania Tel. +370 5 271 6866 Fax. +370 5 216 3494	Major accident hazards
	[There could be also Ministry of Energy and Labour Inspectorate includedMinistry of Energy of the Republic of Lithuania (Lietuvos Respublikos Energetikos	

	Ministerija) Gedimino pr. 38 / Vasario 16-osios g. 2 LT-01104 Vilnius Lithuania Tel. +370 5 262 0549 Fax. +370 5 26 23974 State Labour Inspectorate of the Republic of Lithuania (Lietuvos Respublikos Valstybinė Darbo Inspekcija) Algirdo g. 19, LT-03219 Vilnius Lithuania Tel. +370 5 265 0193 Fax. +370 5 213 9751]	
Government (Lithuanian, regional and local)	 Vilnius Regional Environmental Department (Aplinkos Ministerija) Vilniaus Regiono Aplinkos Aspaugos Departmentas A/ Juozapaviciaus 9 LT - 09311 Vilnius Tel 8-5 272 8636 Vilniaus.raad@vrd.am.lt Elektrenai Environmental Inspectorate (Aplinkos Ministerija) Contact: Virgilijus Pruskas Taikos g.6 Elektrenai LT-26115 Tel 8 - 528 34613 Fax 8-528 34612 	Regulator and legislator bodies at local, regional levels and national level covering: Planning consents Permits for waste, air emissions, effluent discharge, water use etc. Licences for storage, use and transportation of chemicals, safety and explosive atmospheres, emergency procedures and fire protection, occupation health etc

	■ Elektrenai Municipal Administration Elektrenu Savivaldybes Meras Elektrines g. 8 LT 26108 Elektrenai Tel 0 528 58000 Elektrenu.savivaldybe@is.lt Contact: Arvydas Vysniauskas	Project progression in general General community concerns and interactions Migrant worker issues.
Advisory/non-government organisations	 NGO 1: Community "Atgaja" Office address: Maironio str. 14-6, Kaunas, Lithuania Mailing address: ACP P.O.Box 156, Kaunas 44002 Lithuania. Tel. +370 37 425566, 407155 Fax: +370 37 425207 Email: info@atgaja.lt NGO 2: Lithuanian Green Movement P.O. Box 160, Kaunas LT-44002, Lithuania phone: +370 37 324241; fax: +370 37 324201 email: zalieji@zalieji.lt www.zalieji.lt/english 	Local air quality, land use etc Carbon dioxide emissions and climate change Nuclear power.
Clients and client representation	■ No key stakeholders identified	
Institutions (universities, think tanks etc.)	Trakai Public Health Supervision and Staff Education Centre Kodas 191347976, LT-21105 Trakai	Local Health / air quality

	Tel 8-528 55893 Fax 8-528 55936 Traku.vsp@is.lt	
Internal stakeholders (Employees, labour unions)	 2 Unions which are significantly represented at LPP (both have collective agreements with LPP): Professional Union of Electricity Producers Lithuanian General Workers Union 	Retrenchment, training, employment and social policy, other procedures / policies, migrant workers etc
Public groups	■ ELEKTRENAI HOSPITAL: Elektrénų ligoninė, Taikos g. 8, LT-26115 Elektrénai, Tel.: +370-528-39553 ■ ELEKTRENAI SCHOOLS: Elektrénų Versmės gimnazija Saulės g. 30, LT-26121 Elektrenai, Tel.: +370-528-39 616 Elektrénų "Ąžuolyno" pagrindinė mokykla Rungos g. 24, Elektrenai Tel./fax: +370-528-39626 E-mail: azuolyno@gmail.com Elektrénų pagrindinė mokykla Rungos g. 5, LT-26110 Elektrénai Tel.: +370-528-39 790	Local air quality, land use Potential for accidents during construction. Schools interest in local economic development of the area and future employment potential.
General communities	■ LOCAL COMMUNITY CENTRE Elektrénų bendruomenės iniciatyvų centras Taikos g. 8, Elektrėnai Tel.: +370-528-39 415	Local air quality, land use, Construction traffic Migrant workers Locally sourced construction labour and future plant labour opportunities.

	■ Gardening Community Klevas", Elektrenai municipality, Elektrenai, Lithuania	Effect of plant on local land use / plant growth.
Other key affected parties	FISHERIES COMPANY UAB Bartzuve Birutės g. 5 Naujųjų Kietaviškių km. Elektrėnų sav., Lietuva Tel. +370-346-44662 Mob. +370-656-39777 El.p. arvydas@bartzuve.lt http://www.bartzuve.lt/	Use of Elektrenai Lagoon for fishing. Relevant to the additional cooling water discharges.

The media

The media are considered as stakeholders for LPP, however these details are provided in the next section, where the methods of communication including via the media are demonstrated.

The identification of stakeholders should be reviewed and the range of interested parties can be expanded and contracted as required during the project implementation.

5 LPP Stakeholder Relations

5.1 OVERVIEW OF EXISTING STAKEHOLDER RELATIONS

LPP are involved in the local community and have good community relations. They provide subsidies for recreational and leisure activities, support at schools and kindergartens for employee children through the supply of gym and computer equipment.

5.2 SUMMARY OF ENGAGEMENT ACTIVITIES

EBRD requirements

An example table demonstrating the public consultation and information disclosure that should be recorded is provided in the next section.

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, etc.), and how it was released or distributed
- The locations and dates of any meetings undertaken to date
- Individuals, groups, and/or organizations that have been consulted
- Key issues discussed and key concerns raised
- Company response to issues raised, including any commitments or follow-up actions
- Process undertaken for documenting these activities and reporting back to stakeholders

This table will be kept up to date on all public consultation and information disclosure that is undertaken for future projects.

Previous stakeholder engagement

Previous stakeholder engagement relating to this project has been conducted through:

- An open public meeting conducted in October 2007 at the LPP Site;
- Public announcements within the Baltic Times, the National Daily 'Lietuvos Rytas', and the regional weekly 'Elektrenu Zinios';
- Notices displayed within the public billboards of the gardening community (Klevas", Elektrenai municipality, Elektrenai, Lithuania), Elektrenai Municipality and the Elderate (smallest administrative region).
- Direct written informing of the neighbouring landowners.

6 Stakeholder Engagement Programme

6.1 DISCLOSURE OF INFORMATION

The types of Information to be Disclosed

The information that will be disclosed will be assessed on a specific basis as part of the overall LPP modernisation programme. In general terms, internal and external communications are handled by LPP in a number of ways as detailed below. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation.

The methods of communications

The methods of communication by LPP are summarised in the following Stakeholder Engagement Programme:

6.2 THE FUTURE PROGRAMME

The future programme of engagement is presented below.

 The Non Technical Summary of the Project and the EIA is included on the Lithuanian Power Plant Website and at key locations:

http://www.lelektrine.lt Uploaded 2/10/09

Also at the following:

AB Lietuvos Elektrine,

Elektrines Str. 21 LT-26108 Elektrenai Tel + 370 528 33285 Fax +370 528 39733

Contact A. Sepetys, Chief of the Construction Department

Full EIA Document preparation by:

Lithuanian Energy Institute

Breslaujos Str 3 LT-44403 Kaunas

Tel: +370 37 401879 Fax: +370 37 351271

Contact: Geidrius Stravinskas (Junior Research Associate)

EBRD Resident Office Vilnius

Šeimyniškiu 1A, 4th Floor LT-2600 Vilnius Lithuania

Tel: +370 52 638480

Fax:+370 52 638481

Head of Office: Matti Hyyrynen

Lithuanian Power Plant will collate any comments and feedback associated with the proposed project and will document these according to the Grievence Procedure in Section 6.4

All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within 'The Requirements' section provided in section 3.2.

All communication made will be reviewed for the feasibility to make changes to satify the request and interest and the communicator will be informed on the outcome.

Activity / Project	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups consulted
Full funding approval for the	Announcement of full decision to develop the plant and the increase in generation energy efficiency / pollutant reductions	Press announcement – likely 2009:	International
development of the CCGT.		Weekly national: Baltic Times	Government (Lithuanian, state)
	achieved.	daily national: 'Lietuvos Rytas'	Government (Lithuanian, regional
		regional weekly: 'Elektrenu Zinios'	and local)
		+ local publication ' Elektrenai News'.	Advisory/non-government organisations
		Direct written confirmation and direction back to LPP for responses.	
General plant capacity	Statement on the new strategic role of	Likely 2010	International
increase (prior to the final closure of the Ignalina Nuclear	Statement of implications for the running groups ar	Written communication to defined stakeholder groups and direction back to LPP for responses.	Government (Lithuanian, state)
Power Plant).			Government (Lithuanian, regional and local)
	100.00		Advisory/non-government organisations
			Institutions (universities, think tanks etc.)
			Public groups
			General communities

General plant capacity increase (prior to the final closure of the Ignalina Nuclear	Capacity increase / impact assessment.	2010	Public groups
		the state of the s	General communities
Power Plant).		and CCGT installation – Elektrenai Community Centre and notice board,	Gardening community
		Gardening Community notice board.	Other key affected parties
		2010	Institutions (universities, think tanks
		Written communication to defined stakeholder	etc.)
		groups and direction back to LPP for responses.	Other key affected parties
Pre construction planning – development of CCGT.	Construction impacts and mitigation proposals Expected migrant / imported worker arrangements.	2010	General communities
development of CCG1.		Notices in community centre, municipality and gardening community centre notice board.	Public groups
		Direct written notification to surrounding landowners and occupiers.	
		Written description of plans	Internal stakeholders (Employees, labour unions)
Prior to CCGT commissioning	Operational plans	2011	International
	Technology position	Site open meeting held in the conference centre at LPP.	Government (Lithuanian, state)
			Government (Lithuanian, regional

		Specific invites to key stakeholder groups.	and local)
			Advisory/non-government organisations
			Institutions (universities, think tanks etc.)
			Public groups
			General communities
	Site operation		Gardening community
			Internal stakeholders (Employees, labour unions)
Decommissioning of Units 3	Decommissioning confirmation.	Prior to 31 st December 2011.	International
and 4.	Overall beneficial impact position.	Written notification.	Advisory/non-government
			Public groups
		Way forward for LPP and future strategy update	Internal stakeholders (Employees, labour unions)

6.3 MONITORING, REPORTING AND FEEDBACK MECHANISMS

Through communication channels such as media and letter notifications, surveys, exhibitions, one-to-one meetings and the periodic meetings as listed above, LPP will monitor and provide feedback as appropriate.

For public consultation meetings or public exhibitions, LPP will use an open book (with pens provided) for recording comments anonymously. This book will be present in an obvious area of the exhibition but in an area that will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by LPP so that a response and feedback can be made to stakeholders.

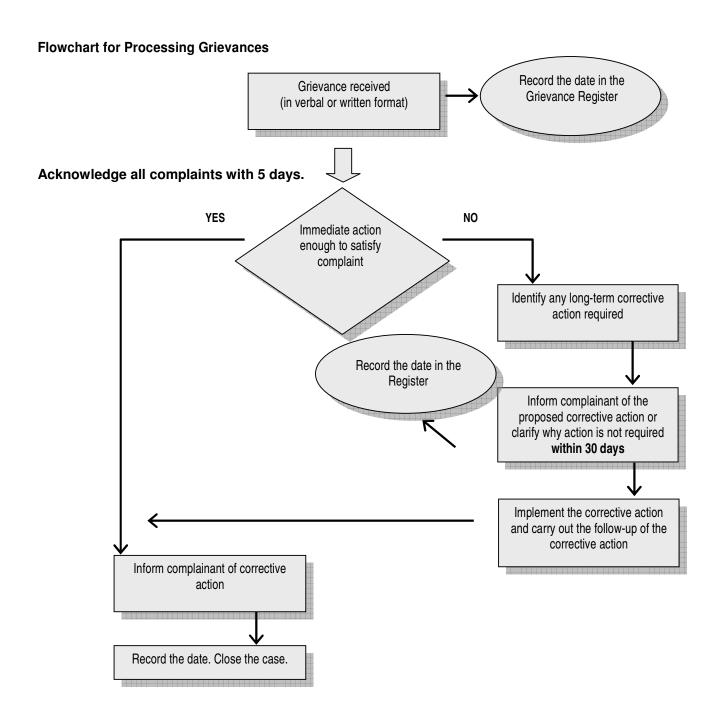
6.4 GRIEVANCE MECHANISM

If there are questions or complaints, the following grievance mechanism will be used:

- A written appeal to the Chief of the Construction Department, Mr Sepetys (A.Sepetys@lelektrine.lt or +370 528 39533).
- Worker issues can be raised to line managers or Via the trade union representatives;
 and
- An application to courts

External complaints relating to the environmental impact of the LPP plant will be recorded and kept in a communications/ complaints log book. All communications will be acknowledged within [5] business days and a response within [20] business days.

A communications procedure and log will be developed by LPP for use during the period of the Stakeholder Engagement Plan. This will be used to log all significant incoming and outgoing communications.



Public Grievance Form Reference No: Full Name Contact Information By Post: Please provide mailing address: Please mark how you wish to be contacted (mail, telephone, e-mail). By Telephone: _____ By E-mail _____ Preferred Language [Lithuanian] communication [English] [Russian] **Description of Incident or Grievance:** What happened? Where did it happen? Who did it happen to? What is the result of the problem? Date of Incident/Grievance One time incident/grievance (date Happened more than once (how many times? _____) On-going (currently experiencing problem) What would you like to see happen to resolve the problem? Signature: Date: Please return this form to: Mr Sepetys, Head of Construction department, LPP (A.Sepetys@lelektrine.lt) Elektrinės 21 LT-26108, Elektrėnai Imonės kodas 110870933 Tel (8~528) 39533, +370 528 39533 Fax (8~528) 39

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