
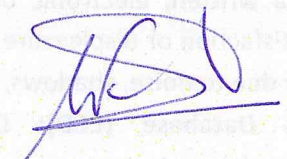
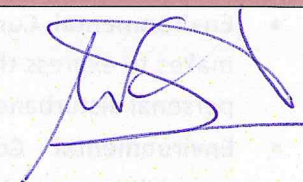


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0 CHANGE CONTROL

Edition	Date	Description of the modification
00		Initial edition

1 OBJECTIVE AND SCOPE

The purpose of this procedure is to define the process to identify, record and respond to the environmental complaints of the stakeholders affected by the Organization, ensuring that the essential requirements for its effective control and management are in place.

This procedure shall apply to the facilities and activities included in the EMS scope set out in the file *Facilities in the EMS scope*.

2 REFERENCES

- ISO 14001:2004 standard.
- MAN-EU/EMS-MAN-00001 *EMS Manual*
- EXPR-EU/EMS-GEN-00001 *Identification and assessment of environmental aspects*
- EXPR-EU/EMS-GEN-00005 *Communication*
- *Spain Business Unit - Complaints Management Procedure - version 1.0*

3 DEFINITIONS

- **Complaint:** a written, electronic or oral statement that somebody makes to express their dissatisfaction or displeasure about something.
- **Complainant:** any person who claims something because he/she believes that he/she has the right to it.
- **Complaint Receiver:** any person who receives a complaint in the first instance.
- **Complaint Owner:** person/s in charge of the analysis, resolution and monitoring of every specific and individual complaint, as well as being in contact with the complainant.
- **Environmental Complaint:** a written, electronic or oral statement that somebody makes to express their dissatisfaction or displeasure about any environmental issue or personal disturbance (mainly due to noise, shadows, problems with TV reception, etc).
- **Environmental Complaints Database (ECD):** Database where environmental complaints are registered in each country.
- **Environmental Complaints Database administrator (ECD administrator):** person responsible for the Environmental Complaints Database (ECD) in charge of recording the complaints information and ensuring that complaints management data is periodically provided by the Complaint Owner.

- **Stakeholder:** a person, group, organization, member or system who affects or can be affected by an organization's action. Stakeholders cover a wide range of players, such as shareholders, employees, customers, suppliers, governments, NGOs, media, etc.

4 ABBREVIATIONS

- **EMS:** Environmental Management System.
- **EDPR EU:** EDP Renewables Europe.
- **ECD:** Environmental Complaints Database.
- **ECD administrator:** Environmental Complaints Database administrator.
- **EMS Manager:** EMS Manager in each country.
- **SIS:** Sustainability Information System.

5 PROCEDURE

5.1 ENVIRONMENTAL COMPLAINTS MANAGEMENT

Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a company's environmental and social performance.

The use of an effective Environmental Complaints mechanism facilitates early indication of, and prompt remediation for those who believe that they have been affected by the company's actions, from an environmental or social point of view.

Through the analysis of the Environmental Complaints received, EDPR EU is able to identify areas for improvement in the organization and take the appropriate actions for correction/remediation:

EDPR EU *Management of Environmental Complaints* procedure is scaled to the risks and adverse impacts of its facilities and has stakeholders as its primary user. It seeks to resolve concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern.

This mechanism does not impede access to judicial or administrative remedies.

In the event that any country in EDPR EU already has a grievance or complaints management mechanism in place, it can be used for this purpose. In this case, the EMS Manager shall inform the EDPR EU EMS Manager. They will both verify the proper adjustment of the existing mechanism with this procedure.

5.1.1 RECEPTION AND RECORDING

Environmental Complaints are written, electronic or oral statements that somebody makes to express their dissatisfaction or displeasure about an environmental issue or personal disturbance.

Complaints' receivers are any person who receives a complaint in the first instance, either an EDPR employee or a person working on its behalf.

A Public Grievance Form according to the template TMP-EU/EMS-GEN-00016 *Public Grievance Form* is available in all wind farms in operation. It's not mandatory for the complainant to use this template to record his/her dissatisfactions or displeasures because complaints can be communicated to the company through different means: telephone, email, personally at EDPR offices or facilities, etc.

In the event of receiving an oral complaint, the Complaint Receiver shall ask the complainant to record it in the template TMP-EU/EMS-GEN-00016 *Public Grievance Form* or record it himself/herself. Once duly filled, a copy of this form shall be sent immediately to the ECD administrator and the original form shall be kept by the Complaint Receiver as evidence.

The Country EMS Management Representative shall appoint the ECD administrator.

All complaints shall be logged in the ECD as soon as possible since its reception. There is not an official template for the ECD, but at least the following information shall be recorded by the ECD administrator:

- Initial Complaint data:
 - Reference nº: number assigned to the complaint according to its date of reception.
 - Identification:
 - Facility name: facility subject of the complaint.
 - Related infrastructure: facility infrastructure subject of the complaint: substation, transmission line, etc.
 - Complaint data:
 - Type of Environmental Complaint: noise, waste, spills, emissions, visual impact, cultural heritage impact, electromagnetic field, lighting systems disturbance, shadow flicker effect, vibrations, TV reception problems, others.
 - Reception date
 - Short description (title)
 - Detailed description
 - Complainant data:
 - Name
 - Address
 - Telephone number
 - E-mail

After recording this information, the ECD administrator shall assign the complaint to the person who shall be in charge of its analysis, resolution and monitoring (Complaint Owner).

The assignment of complaints to each Complaint Owner will be made following the guidelines established in each country in this regard.

5.1.2 RESPONSE & CLOSE

The Complaint Owner shall analyze the complaint and look for a suitable solution. Whenever possible, the corrective action shall be intended to remove the cause of the claim in order to avoid it happening again, not just to solve the current problem.

The complaints information in the ECD shall be updated whenever the progress of the process makes it necessary, and at least once every 30 days when complaints are in process of resolution. The date of last update shall be always recorded. At least, the following information shall be provided by the Complaint Owner to update the ECD:

- Complaint management data:
 - Status: assigned, in process, closed.
 - Complaint Owner name: person responsible for analyzing the complaint and providing a solution.
 - Solution adopted
 - Solution costs (€), if any
 - Penalties received, if any
 - Closing date
 - Date of last update

The Complaint Owner shall respond the complainant using the same means of communication and language used by the complainant (unless justified otherwise). The complainant shall be informed about the proposed corrective action or clarify why a corrective action is not required.

During and after the implementation of the corrective action, the Complaint Owner shall monitor the progress of the process and provide the corresponding information to update the complaint in the ECD.

Once the complaint has been solved and it is closed, its status in the ECD shall be changed to "Closed".

The ECD administrator shall ensure that the information regarding Environmental Complaints is periodically updated.

Communications arising from the analysis and resolution of complaints shall be kept as evidences.

5.2 ENVIRONMENTAL COMPLAINTS MONITORING

The identification, recording and resolution of complaints are essential features of the EDPR EU EMS since it ensures that stakeholders' environmental and social concerns are identified and properly solved. But so is, its global analysis and monitoring since it gives EDPR EU a full picture of its situation in terms of Environmental Complaints.

For that purpose, the EMS manager as well as the EDPR EU EMS manager, shall analyze and monitor Environmental Complaints periodically with these main objectives:

1. Regularly monitor the Environmental Complaints received, ensuring its management and thereby achieving the object of this procedure.
2. Ensure that whenever possible, the corrective action is focused to remove the cause of the claim in order to avoid it happening again, not just to solve the current problem.
3. Perform a comprehensive analysis of all complaints received to identify common causes, standard solutions, etc and share this knowledge to prevent similar complaints elsewhere or avoid a complainant response delay longer than necessary.
4. Analyze the performance of the company regarding complaints management and consider if the procedure fits the organization reality or otherwise, it should be reviewed.

The following indicators, and any others deemed useful, shall be monitored in order to analyze the goodness of the performance of the company, both globally and by type of complaints:

- The age of the complaints with status "in process".
- Number of complaints received in a time period.
- Average time of complaints resolution.

The conclusions of this analysis shall be included in the section 4. *Communications of stakeholders* of the Management review report.

5.3 REPORTING

Every quarter the EMS manager, as SIS contributor, shall report in SIS the information regarding environmental complaints and penalties.

These data shall be reported by facility. Comments or documents shall be attached, when necessary for better understanding.

The information to report in SIS regarding complaints and penalties shall be the accumulated data for the whole calendar year.

MANAGEMENT OF ENVIRONMENTAL COMPLAINTS

IA - 19.I- Environmental Complaints

Indicator	Prev. Value	Value	Unit	AP
✘ IA-19.21.S : IA-19.21.S: N° of Noise Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.22.S : IA-19.22.S: N° of Electromagnetic fields Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.24.S : IA-19.24.S: N° of Spills Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.25.S : IA-19.25.S: N° of Waste Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.26.S : IA-19.26.S: N° of Emissions Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.27.S : IA-19.27.S: N° of Biodiversity Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.28.S : IA-19.28.S: N° of Landscape Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.29.S : IA-19.29.S: N° of Other Complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
● IA-19.3.C : IA-19.3.C: Total environmental complains received			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.19.S : IA-19.19.S : Complains average answering time (days)			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.20.S : IA-19.20.S : Costs of corrective actions resulting from environmental complains(costs)			EUR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

Remarks

IA - 19 - Compliance/Incidents or Fines

Indicator	Prev. Value	Value	Unit	AP
✘ IA-19.1.S : IA-19.1.S : Number of environmental infraction			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.2.S : IA-19.2.S : Number of environmental crime			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
● IA-19.3.S : IA-19.3.S : Number of environmental penalties			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.4.S : IA-19.4.S : Environmental fines (currency unit)			EUR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.5.S : IA-19.5.S : Environmental crime (currency unit)			EUR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
● IA-19.6.S : IA-19.6.S : Environmental penalties (currency unit)			EUR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.7 : IA-19.7.S : Environmental compensation (currency unit)			EUR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.8.S : IA-19.8.S : Number of started processes sanctioning			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.9.S : IA-19.9.S : Number of pending processes sanctioning			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
✘ IA-19.10.S : IA-19.10.S : Number of resolved processes sanctioning			-	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

Remarks

6 RESPONSIBILITIES

EMS Manager:

- Analyze and monitor Environmental Complaints periodically and include the conclusions of the analysis in the Management review report.
- Inform periodically to the Country EMS Management Representative about the implementation of the procedure and the status of the complaints.
- Coordinate with the concerned departments the implementation of the necessary preventive and corrective measures.
- Report in SIS quarterly the information regarding environmental complaints and penalties.

Country EMS Management Representative:

- Ensure the implementation of this procedure.
- Analyze the Environmental Complaints together with the EMS manager and agree the necessary preventive and correctives measures in a global manner.
- Appoint the ECD administrator.

EDPR EU EMS Manager:

- Analyze and monitor Environmental Complaints periodically and include the conclusions of the analysis in the Management review report.

Wind farm Manager:

- Promote a proactive attitude among the wind farm staff for the early detection of those issues that could cause future Environmental Complaints.
- Ensure that all Environmental Complaints received at the wind farm are properly recorded and immediately communicated to the ECD administrator.
- Ensure that the Public Grievance Form is available at the wind farm for any stakeholder.
- Support the implementation of the corresponding preventive or corrective measures, if so.

Any complaints receiver:

- In the event of receiving an oral complaint, ask the complainant to record it in the Public Grievance Form or record it himself/herself.
- Send immediately a copy of any complaint received to the ECD administrator and keep the original record as evidence.

ECD administrator:

- Register the initial complaints data in the ECD as soon as possible since its reception.

- Assign the person in charge of each complaint (Complaint Owner).
- Ensure that the ECD is periodically updated.

Complaint Owner:

- Analyze the complaint and look for a suitable solution trying to focus the corrective action in the removal of the cause of the claim.
- Monitor the progress of the process during and after the implementation of the corrective action.
- Provide the necessary information (at least, the topics defined as “Complaints management data”) to update the complaint in the ECD, whenever the progress of the process makes it necessary and at least once every 30 days when complaints are in process of resolution.
- Respond the complainant providing information about the proposed corrective action or clarifying why a corrective action is not required.
- Keep communications arising from the analysis and resolution of complaints as evidences.

7 TEMPLATES

- TMP-EU/EMS-GEN-00016 *Public Grievance Form*.



MANAGEMENT OF ENVIRONMENTAL COMPLAINTS

PUBLIC GRIEVANCE FORM		TMP-EU/EMS-GEN-00016
Reference number:		
Full name:		
CONTACT INFORMATION Please mark how you wish to be contacted (mail, telephone, e-mail):	<input type="checkbox"/> By Post: please provide mailing address:
	<input type="checkbox"/> By Telephone:
	<input type="checkbox"/> By e-mail:
	
Preferred language for communication:		
Description of the incident or the grievance <i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>		
Date of the incident /grievance		
<input type="checkbox"/> One time incident/grievance (Date: ____/____/____)		
<input type="checkbox"/> Happened more than once (how many times?)		
<input type="checkbox"/> On-going (currently experiencing the problem)		
What would you like to see happen to resolve the problem?		

Please, send this form to:

Mr/Ms: XXXXXXXXXXXXXXXXXXXX
 EDPR Renewables XXXXXXXXXXXX
 Address: XXXXXXXXXXXXXXXXXXXX
 Tel: XXXXXXXXXXXX
 Email: XXXXXXXXXXXXXXXXXXXX

Signature
Date: