

Stakeholder Engagement Plan

Energy Recovery Facility in Łódź
ul. Jadzi Andrzejewskiej 5
(Thermal Waste Conversion Facility)

(construction, operation, and decommissioning phases)

Łódź
May 2024.
edit: 1.

Compiled by	Checked by	Approved by
Mediadem Consulting team (E. Dmowska-Mędrzycka, J. Mędrzycki, A. Giel, J. Cybułska)	Bartosz Jankowski	Project Manager
16 May 2024	22 August 2024	29 August 2024

Stakeholder engagement plan

Table of contents

1.	Introduction	3
2.	ERF Project description.....	4
2.1.	Location	4
2.2.	Need.....	5
2.3.	Characteristics	5
2.4.	Status and schedule	6
3.	Regulatory framework for stakeholder engagement	7
3.1.	General information	7
3.2.	Relevant national requirements for stakeholder engagement	7
3.3.	EBRD requirements	12
3.4.	Investor's own standards and procedures	13
4.	Previous stakeholder engagement	13
4.1.	Summary of activities	13
4.2.	Lessons learned from stakeholder engagement to date	14
5.	ERF stakeholders and ways of communicating with them.....	23
6.	Stakeholder programme.....	27
7.	Grievance mechanisms	30
7.1.	Procedure for dealing with grievances and complaints on the ERF	30
7.2.	IPAM procedure.....	31
7.3.	Other procedures for dealing with complaints	31
8.	SEP management	31
8.1.	Supervision, costs, support, language of cooperation	32
8.2.	SEP Working Group and CLO.....	32
8.3.	Documentation, monitoring and evaluation of SEP.....	32
8.4.	Reporting to stakeholders	33
9.	Contacts.....	34
9.1.	Community Liaison Officer (CLO)	34
9.2.	Other relevant authorities.....	34
10.	Annexes	35
10.1.	Procedure for handling grievances and complaints regarding the ERF	35
10.2.	Model grievance and complaint form	36
10.3.	Abbreviations and definitions of terms.....	36
10.4.	Footnotes.....	38

1. Introduction

Veolia Energia Polska Spółka Akcyjna ("**Veolia Polska**", "**Investor**", "**current Investor**", "**new Investor**") is designing the construction of a thermal waste conversion plant ("**TWCF**") at ul. Jadzi Andrzejewskiej 5 in the city of Łódź, Poland. The thermal conversion of waste at the plant will be carried out to recover energy, which is why the investment is now referred to as the Energy Recovery Facility in Łódź ("**ERF**", "**Project**", "**ERF Project**", "**Investment**", "**Facility**").

The first investor in the TWCF was the Municipality of Łódź ("**First Investor**", "**Previous Investor**", "**City of Łódź**", "**City**"), which started conceptual work on the realisation of the thermal waste conversion facility as early as 2007. For this purpose, in 2009, the City authorities acquired a plot of land on Jadzi Andrzejewskiej street from Dalkia Łódź SA. After a full environmental impact assessment of the Project including an environmental and social impact report and public consultations ("**ESIA**"), the First Investor obtained an environmental conditions decision for the TWCF (on 28 June 2010), which was then "extended" twice in connection with the preparation of the different stages of the Project (25 August 2014 and 20 June 2016). This second "extension" is currently the subject of a court case filed by a non-governmental organisation, and the case is currently pending before the Supreme Administrative Court ("**NSA**") in the last instance. As the TWCF project was part of the wider project called "Municipal waste management in Łódź – Phase 2", the City authorities sought funding for the TWCF from the EU's Cohesion Fund, under the Operational Programme Infrastructure and Environment. The City also obtained some funds from the National Fund for Environmental Protection and Water Management ("**NFOŚiGW**") for preparatory work for the construction of the TWCF. However, due to protracted procedures, the Project did not receive EU funding.

Following the abandonment of the investment by the City of Łódź on 13 July 2017 Veolia Polska, through its subsidiary Veolia Energia Łódź SA ("**Veolia Łódź**"), acquired the right of perpetual use of the plot of land on which the TWCF was to be built from the First Investor. In addition, Veolia Polska purchased the documentation and studies concerning the Investment. The current Investor of the ERF is Veolia Polska. Veolia Polska is implementing the ERF project through a special purpose vehicle Veolia Nowa Energia Sp. z o.o., based in Łódź ("**SPV**" or "**VNEL**"). The ERF site is adjacent to the site of the CHP4 Combined Heat and Power Plant ("**CHP4**") owned by Veolia Łódź. The SPV has leased the plot of land for the ERF Project from Veolia Łódź. The companies have also entered into an agreement regarding adjacent plots of land for ERF (access, network construction). The Mayor of Łódź issued (on 22 January 2020) a decision to transfer the environmental decision to the new Investor and issued a decision to establish development conditions for the new Investor (on 2 July 2020). In 2020 and 2021, a full reassessment (including a new environmental impact report and public consultations) of the impact of the ERF Project on the environment ("**EIRA**") was carried out in connection with the building permit proceedings. The Regional Directorate for Environmental Protection (RDOŚ) in Łódź agreed the new environmental conditions of the Project (on 27 August 2021) and the decision on the building permit for ERF ("**BP**") was issued (on 15 November 2021). The BP is final and binding, and cassation from the complaint of an NGO was dismissed (on 25 June 2024) by the Supreme Administrative Court. The Investor has also obtained a decision to amend the building permit (on 27 November 2023), which is already final and binding. In addition, the Investor has obtained decisions on land development conditions (on 02 March 2023) and a building permit (on 05 May 2023) for developing water and sewage network for the ERF on the neighbouring plots of land. A general contractor for the Investment has already been selected, and the Investor is currently in the process of obtaining financing

(among other activities in this area, the Investor has applied for funding from one of the priority programmes operated by the NFOŚiGW).

Veolia Polska, part of Veolia Energie International, belongs to the international Veolia Environment SA, based and registered in France ("**Veolia**"). In Poland, Veolia Polska has 16 main operational companies and their subsidiaries. They are operating in 123 municipalities. These companies are involved in the distribution of heat energy through district heating networks (in 58 cities), the production of heat energy, electricity and other heat-related services (in 75 cities), as well as water and wastewater management. Veolia Łódź is a producer of co-generated heat and electricity and the owner of the district heating network in Łódź.

ERF is part of Veolia's investment drive to completely phase out the use of coal (i.e., decarbonise) at its plants by 2030. So far, Veolia Łódź has implemented the following activities as part of this plan: launch of a biomass installation at CHP4, closing down of the EC2 CHP plant, and modernisation of the heat distribution network to improve efficiency. In addition to the ERF, Veolia Łódź is also planning to build a gas unit at CHP4, a torrefaction plant at EC3 CHP Plant, a heat storage facility, as well as further network upgrades and energy efficiency services targeting heat consumers.

The ERF project has been developed in compliance with EU and national legislation and as a response to national, regional and municipal strategies, plans, policies and development programmes in the fields of waste management, energy and environmental protection, especially as regards fostering clean air.

From the outset of the Investment, both the Previous and Current Investors followed a policy of disclosing all relevant documents, as well as informing, collaborating with and involving a wide range of stakeholders. The forms of stakeholder engagement ranged from compliance with the law to provision of extensive additional information, educational activities and social/community engagement. These were aimed at: ensuring transparency, increasing stakeholder confidence in the Investors and acceptance of the Project by as many stakeholder groups as possible, soliciting stakeholder feedback, and taking it into account in the development of the ERF.

This Stakeholder Engagement Plan or the **SEP** of the ERF Project describes the national legal framework and standards related to stakeholder engagement, summarises the project disclosure and stakeholder engagement to date (in the preparatory and design stages), and describes the further planned activities in these areas during the construction and operation stages of the ERF. An important aspect of these activities is the disclosure of information, such as non-technical summary, environmental and social impact assessment documents, administrative decisions regarding the ERF, this SEP and annual stakeholder engagement reports as well as other documents disclosed by EBRD, as described in Section 6.

The SEP assumes a systematic, ongoing and meaningful relationship with the various stakeholder groups, depending on their formal role under the legal framework, but above all in relation to the degree of possible impact (even subjectively perceived) of the ERF on these groups, in particular local communities (including vulnerable groups) and community organisations.

This document also includes the main principles behind the procedure for handling grievances and complaints. The procedure enables any stakeholder to lodge a complaint or grievance in a convenient manner and secures the right for any stakeholder to be dealt with in accordance with the highest

standards and good practices used in such complaint mechanisms and procedures, as described in Section 7.

The SEP will be updated on an ongoing basis depending on the needs and status of the Project. This edition of the document is primarily concerned with the construction phase (as the decisions and permits allowing the start of construction have been obtained, the preparatory and design phases have been considered complete). This document also provides an overview

2. ERF Project description

2.1. Location

The ERF is planned within the territory of the City of Łódź, in the district of Widzew, within the auxiliary unit of the municipality of Osiedle Olechów-Janów, at Jadzi Andrzejewskiej 5 Street. Łódź is one of the largest cities in Poland, both in terms of population and surface area. The city is located in the very centre of the country, in Łódzkie Voivodeship (Łódzkie administrative region).

The plot has a surface area of 31,411 sqm, registration number 56/222 in the geodetic area W-32, and is located in the north-western part of CHP4 owned by Veolia Łódź. Veolia Łódź is the perpetual usufructuary of the plot owned by the State Treasury. Veolia Łódź has entered into a 30-year lease agreement with VNEL for the plot of land for the ERF, as well as an agreement for the development of utilities (networks) and the granting of the right to use neighbouring properties for ERF construction purposes (access). The legal status of the property for the ERF is therefore settled. No additional land acquisition from stakeholders is needed, but an agreement will be made with the City of Łódź for the use of access roads on two neighbouring city plots.

The Project is located in an industrial area (a typical landscape subject to strong impacts of industrial plants), on the outskirts

of SEP activities to be implemented during the operation and decommissioning phases.

In addition, the SEP defines the governance of the SEP (the stakeholder relations working group and the roles of its individual members, as well as the modalities for funding the ERF disclosure and stakeholder engagement activities) and for monitoring and reporting to stakeholders.

of the city, away from residential buildings. The site is covered with turf and fully fenced. There is a row of coniferous trees along the western and southern fences.

In the immediate vicinity of the ERF site, to the north, on the opposite side of J. Andrzejewskiej Street, there are the local Family Allotment Gardens “Elektron” (“**FAMG Elektron**”), and further north – service and commercial facilities (a retail park) and a petrol station. To the east is the CHP4 thermal power station, and behind it is the cemetery. From the south, the plot is bordered by railway siding tracks, and the plot further to the south is developed with industrial plants and warehouses reaching up to Dąbrowskiego Street. To the west, there are industrial buildings in the adjacent area on A. Puszkina Street, stretching as far as Lodowa Street and further on to Papiernicza Street and the Zarzew municipal cemetery.

The nearest residential buildings are located at a distance of over 600 m from the plot’s border – these are the residential blocks of flats of the Bolesław Chrobry Housing Cooperative (“Osiedle Chrobrego”). Both environmental and social impact assessments have shown that these buildings are not within the acoustic impact range of the ERF. Nevertheless, the residents of Osiedle Chrobrego together with the persons in possession of



Figure A2.1: Location of the ERF.

the FAMG Elektron allotments are considered by the Investor to be a vulnerable stakeholder group.

Pursuant to the spatial policy specified in the Study of Conditions and Directions of Spatial Development of the City of Łódź⁴, the ERF is located in the areas earmarked for development, in the all-city zone marked with the AG2 symbol i.e., functional and spatial unit: areas of significant economic activity.

In the ESIA, a comprehensive analysis of three possible locations in Łódź was carried out, which resulted in naming the most convenient location as the plot at ul. J. Andrzejewskiej 5, also for social reasons (no residential developments in the immediate vicinity) and due to the fact that this location poses no threat to local natural values. These analyses are presented in the ESIA report, which is disclosed and publicly available, as described in Section 6.

2.2. Need

The realisation of the ERF solves the problem of non-recyclable waste in Łódź, closing the circular economy cycle. The investment fits into a number of strategies, policies, concepts, programmes, plans and other strategic documents, both at EU, national, regional and municipal levels². Public consultations and stakeholder engagement in some of these documents involving the ERF are presented in Table A4.1.

The ERF will generate energy and heat from residual fractions that can no longer be recycled and cannot be landfilled. The ERF will be part of the stream of investments to move away from coal in the Łódź energy sector and to ensure “circularity” in the City’s waste management. The priority is to segregate and recycle as much waste as possible. The fractions of waste that cannot be recycled, on the other hand, can be turned into fuel for the generation of electricity and heat.

The ERF will result in a decrease in the City’s use of coal for energy production by more than 373,000 tonnes per year, which will translate into a 12% reduction in carbon dioxide emissions. Emissions of particulate matter, sulphur dioxide and nitrogen oxides will also fall significantly.

The basis for the need to construct the ERF, considering its benefits and the mitigation of identified impacts, is presented in the non-technical summary of the Project and the ESIA and EIRA

reports, as well as in administrative decisions. These documents are all disclosed and available as described in Section 6.

2.3. Characteristics

The ERF is a 200,000 tonnes per year thermal waste conversion facility with a calorific value of 12.5 MJ/kg operating for at least 7,800 hours (325 days) per year. All the energy produced will be received by Veolia Łódź. The plant will be equipped with two independent processing lines. Each will consist of a grate boiler and a flue gas cleaning installation. Both lines will be used to recover energy for the water-steam system, which will power a steam turbine (bleed and condensing). The ERF will produce electricity (150,000 MWh) and heat (470,000 MWh) at the same time, but it will also be possible to produce heat alone or solely convert thermal waste. The ERF will use shredded residual fraction waste (the so-called RDF/pre-RDF), which is not suitable for further recycling, as the primary fuel. The term RDF (Refuse Derived Fuel) refers to a type of fuel that increases the recovery of raw material from municipal waste, a prioritised solution in industrialised countries. In addition, the ERF will be able to convert textiles, wood, plastics, rubber, paper, cardboard and other waste remaining after the mechanical treatment. The ERF will not process mixed municipal waste.

The designed chimney is 50 m high. The plant will use a dry flue gas cleaning method using sodium bicarbonate (NaHCO_3) and activated carbon. This method has been significantly developed recently and is very effective. It is a proven solution that meets BAT requirements and is widely used as it is not prone to issues known from using the semi-dry method. Dust removal by fabric filters with an efficiency of 99.8% will also be carried out, as well as denitrification by primary and secondary SNCR methods. Emission monitoring data will be presented on an ongoing basis on a light display board at the gatehouse and on the ERF website.

Fuel for the ERF will be delivered by an average of 43 trucks per day (10 and 23 tonne payloads), 5 days a week, from 6.00 a.m. to 4.00 p.m. (an average of 4.3 cars per hour). The route of access of trucks with deliveries will be along the following streets: Puszkina and Jadzi Andrzejewskiej. Upon entering the Site, the loaded walking floor or tilt trailer will be weighed, entered into the waste database and checked for radioactivity (dosimetry check). It will then be directed to the unloading hall where the loaded waste will be discharged into a bunker. The

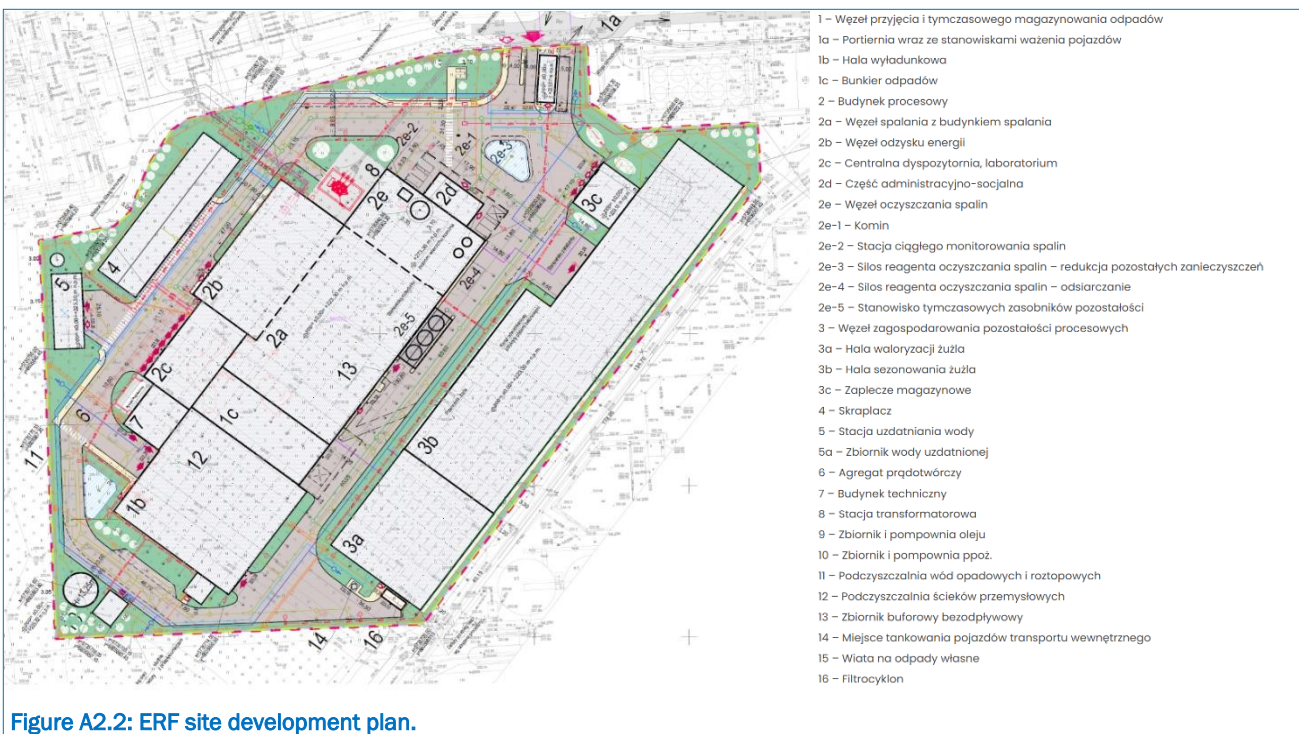


Figure A2.2: ERF site development plan.

vehicle will enter the hall through an access gate. The unloading hall will be large enough to allow vehicles to manoeuvre freely inside. The unloading hall will be kept under negative pressure so that no odours escape. The vehicle will approach the unloading bay in reverse and, after unloading, will leave the hall through the exit gate. It will then head to the weighing station after which a waste receipt will be issued. The empty truck will then leave the ERF site. In very exceptional cases, once radiation is detected in the waste, the vehicle will be directed to the Site's quarantine area.

Dust and ash remaining after the conversion process will be collected by tanker silo trucks. Upon entry, the empty tanker-silos will be weighed on a scale and entered into a waste database. The truck will then be directed to load the post-processing waste from silos equipped with loading sleeves. The loading will take several hours. Collection of post-processing waste will take place on working days, with 2 transports per day of 21.5 tonnes each. After loading, the vehicle will be weighed again and recorded in the waste database. The tanker silo truck will then leave the Plant and the dust and ash will be delivered for further processing by professional operators. As regards slags remaining after waste transformation, they will be collected by tilt-type trucks. Upon entry, the empty truck will be weighed and entered into the waste database. It will then be directed to load at a station adjacent to the slag seasoning hall. Loading will take place using a wheel loader and will take several minutes. The slags will be collected on working days by 10 transports per day of 21.5 tonnes each. After loading, the vehicle will be weighed and recorded in the waste database. It will leave the plant for further processing by professional operators.

The ERF site is also designed to include a nature trail with tours organised for visitors/stakeholders, green roofs, rainwater tanks and rain gardens, greenery planting and ivy planting, and one of the walls will be probably a space to invite mural artists to paint on.

2.4. Status and schedule

According to national legislation, the ERF is classified as a project that may always have a potential significant impact on the environment. As such, the project was subject to two environmental impact assessments (including an environmental impact report and public consultations) when obtaining the environmental decision and the building permit (the relevant stakeholder engagement is presented in Table A4.1). During the preparatory and design stages, the Project obtained all necessary decisions, including the building permit and the amendment of this permit (on 27 November 2023). A cassation has been filed against the building permit with the Supreme Administrative Court, where the case was dismissed by a final and binding ruling. There is also a case pending at the Supreme Administrative Court following a complaint by an environmental organisation regarding the second "extension" of the environmental decision (as described in Table A4.1). As the decisions allowing the construction phase to begin have been obtained, the preparatory and design phases (within the meaning of the GN10³) have been declared complete.

The process of selecting the general contractor for the Project has also been completed, with the consortium formed by Doosan Enerbility Co. Ltd. and Doosan Lentjes GmbH named as the winning entity (contract dated 17 April 2023).

At present, the Investor is in the process of securing the financing for the project; among other activities, the Investor has applied for a grant from the National Fund for Environmental Protection and Water Management's priority programme, "Use of alternative fuels for energy generation purposes".

The construction phase is scheduled to start on 1st quarter of 2025. The construction will take approximately 3.5 years. Obtaining an occupancy permit and the start of the operation phase are planned for 3rd quarter of 2028. The ERF will be operated on a long-term basis and the date of its hypothetical decommissioning is currently unknown.



Figure A2.3: ERF visualisation.

3. Regulatory framework for stakeholder engagement

3.1. General information

Formal stakeholder engagement in Poland in projects such as the ERF Project is primarily implemented through:

- environmental impact assessments (or, where legally required, environmental impact reassessments) preceding the decisions requiring public participation, and strategic environmental impact assessments for certain types of documents prepared or adopted by administrative authorities (including public consultation, participation of environmental organisations, opinion and agreement by other authorities); despite the name, in Poland these proceedings also cover social aspects that are legally required,
- development of spatial planning acts (public consultation, opinion and agreement with stakeholders of the municipality's general plan and local plans),
- the possibility for parties and non-governmental organisations, including environmental organisations, to lodge requests, complaints and grievances during proceedings leading to decisions and orders; such complaints and requests can be filed through both administrative and judicial channels,
- the possibility to lodge complaints with supervisory and control bodies (e.g. building inspectorates, environmental protection inspectorates, labour inspectorates).

The ERF is among projects likely to always have a significant impact on the environment according to Polish law⁴. The project is also classified as Category “A” according to the EBRD's 2019 Environmental and Social Policy. Both of these classifications require a comprehensive environmental and social impact assessment (ESIA) which meets the formal requirements,

features an impact report and includes public consultations. To date, ESIA has been carried out twice at the administrative proceedings stage (as indicated in Table A4.1): the initial one was in 2010 (“ESIA”) and the second one followed before the issuance of the building permit in 2021. (“EIRA”). Furthermore, an additional Traffic and Road Safety Impact Assessment was conducted.

The implementation of the Project will require additional environment-related decisions and approvals prior to the commencement of the operational phase, including those that may require public consultation. A similar impact assessment in the form of a so-called “ecological review” may also be required at the operation stage. In addition, the procedure for adopting the general plan of the city of Łódź is currently underway, and a local spatial development plan may be adopted for the ERF site in the future. The establishment of both plans requires public consultation, as well as a strategic environmental impact assessment. In addition, the regional and municipal authorities have created and will continue to create numerous documents (strategies, plans, programmes, etc.) relevant to the ERF, which require a strategic environmental impact assessment, including public consultations.

3.2. Relevant national requirements for stakeholder engagement

Table A3.1 identifies key national legislation implementing the requirements of the European Union and international agreements requiring stakeholder involvement in the proceedings related to the ERF.

Table A3.1. Key national legislation implementing international requirements for stakeholder engagement.

Key national legislation	EU act / international agreement
<p>Act of 3 October 2008 on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws of 2023, item 1094, 1113, 1501, 1506, 1688, 1719, 1890, 1906, 2029)</p> <p>Act of 27 March 2003 on spatial planning and development (Journal of Laws of 2023, item 977, 1506, 1597, 1688, 1890, 2029, 2739)</p> <p>Act of 27 April 2001. - Environmental Protection Law (Journal of Laws of 2024, item 54)</p> <p>Act of 16 April 2004 on nature protection (Journal of Laws of 2023, item 1336, 1688, 1890)</p> <p>Act of 15 July 2011 on the National Eco-Management and Audit Scheme (EMAS) (Journal of Laws 2020, item 634, 2022, item 1260).</p> <p>Act of 12 June 2015 on the greenhouse gas emission allowance trading scheme (Journal of Laws of 2023, item 589, 2029)</p>	<p>Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment</p> <p>Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora</p> <p>Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment</p> <p>Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information and repealing Council Directive 90/313/EEC</p> <p>Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), repealing Regulation (EC) No 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC</p> <p>Directive 2003/35/EC of the European Parliament and of the Council of 26 May 2003. providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice Council Directives 85/337/EEC and 96/61/EC</p> <p>Directive 2008/1/EC of the European Parliament and of the Council of 15 January 2008 concerning integrated pollution prevention and control</p> <p>Decision (EU) 2018/853 of the European Parliament and of the Council of 30 May 2018 amending Regulation (EU) No 1257/2013 of the European Parliament and of the Council and Directives 94/63/EC and 2009/31/EC of the European Parliament and of the Council, as well as Council Directives 86/278/EEC and 87/217/EEC, as regards procedural provisions for environmental reporting and repealing Council Directive 91/692/EEC</p> <p>Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002 relating to the assessment and management of environmental noise</p> <p>Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe</p> <p>Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives</p> <p>Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds</p> <p>Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control)</p>

Key national legislation	EU act / international agreement
<p>Act of 10 April 1997. - Energy law (Journal of Laws of 2024, item 266)</p> <p>Act of 14 December 2012 on waste (Journal of Laws of 2023, item 1587, 1597, 1688, 1852, 2029)</p> <p>Act of 20 July 2017. - Water law (Journal of Laws of 2023, item 1478, 1688, 1890, 1963, 2029)</p>	<p>Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC</p> <p>Regulation (EC) No 166/2006 of the European Parliament and of the Council of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC</p> <p>Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC</p> <p>Directive 2006/118/EC of the European Parliament and of the Council of 12 December 2006 on the protection of groundwater against pollution and deterioration</p> <p>Convention of the United Nations Economic Commission for Europe on Environmental Impact Assessment in a Transboundary Context, done at Espoo on 25 February 1991 (Journal of Laws 1999, No. 96, item 1110).</p> <p>Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, concluded on 25 June 1998 (Journal of Laws 2003, No. 78, item 706)</p>

In turn, Table A3.2 presents the key areas of Polish law with the relevant acts and a description of the requirements for stakeholder engagement. In general, formal stakeholder engagement regulations require:

- agreement (binding) or opinion (non-binding) by authorities other than those conducting the proceedings,
- announcements in the Public Information Bulletin (BIP) (sometimes also in other communication media) about the commencement of the preparation of a document or the commencement of proceedings concerning a decision – with the possibility to submit applications, review documents, etc,
- publication of a notice in the Public Information Bulletin (sometimes also in other communication media) on the launch of public consultations on a draft document or decision which is being consulted (or featuring information on how to get acquainted with these materials), their deadlines (as a rule not shorter than 21, sometimes 30 days), forms of consultation, possibility to submit comments,
- publication of the consultation report with a list of comments and the manner in which they were considered and the relevant reasons (usually: comments taken into account, partially taken into account, not taken into account, not relevant).

If significant changes are made to the draft document, the whole process may need to be repeated (re-consultation).

All administrative decisions are available upon a stakeholder's request for public information. Environmental information is also made available on the basis of separate regulations. Information on documents is also published in publicly available lists of data on documents containing information on the environment and its protection maintained by the authorities competent for the development and issuance of these documents, and collectively by the Ministry of Climate and Environment.⁵

The most important Polish legal acts providing for the right of stakeholders to challenge acts of local law and lodge requests, complaints, grievances, and similar measures against administrative decisions are as follows:

- Act of 14 June 1960: Code of Administrative Procedure (Journal of Laws 2024, item 572),
- Act of 30 August 2002: Law on proceedings before administrative courts (Journal of Laws of 2023, item 1634, 1705, 1860).

Table A3.2. The most important Polish legal regulations in relation to stakeholder engagement in the ERF project.

Legal area	Key legislation	Summary of the act's requirements for stakeholder engagement
disclosure of information	<p>Act of 6 September 2001 on access to public information (Journal of Laws of 2022, item 902)</p> <p>Act of 3 October 2008 on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws of 2023, item 1094, 1113, 1501, 1506, 1688, 1719, 1890, 1906, 2029)</p>	<p>Public information is any information on public matters, e.g. administrative decisions of the Mayor of the City of Łódź, resolutions of the City Council in Łódź ("RMŁ"), the Sejmik of Łódzkie Voivodeship ("SWŁ"), minutes of committee meetings, draft strategic documents, etc. All administrative bodies create their websites within the Public Information Bulletin ("BIP"), where they disclose public information. In Łódź, these include decisions on land development conditions and building permits, on environmental conditions, projects and resolutions of the City Council, information on public consultations, etc. If public information is not published in the BIP, anyone can file a request for access to such information (orally, by e-mail, by post, or in person at the office). The request does not have to be justified or meet any formal requirements. Access to information must be granted within 14 days. Access can only be refused in a few exceptional cases (on grounds of confidentiality) and refusal to grant access is an administrative decision that can be challenged in administrative court.</p> <p>A special category of public information is environmental information. It is information about a given environment (or its part or element) concerning its condition, assessments, intentions as to its use or purpose, anticipated impact of the planned activity on the environment and measures to counteract this impact. Every citizen has the right to obtain information on the environment and its protection. Information not available to the public can be obtained upon request, as indicated above, but the authority has one month to process the request.</p> <p>Public information is generally obtained free of charge, unless special preparation is required (retrieval, collation, copying, CD recording, courier service), in which case the relevant fee should correspond to the cost of preparation and delivery.</p>
the draft development strategy of the City of Łódź, the development	<p>Act of 8 March 1990 on municipal self-government (Journal of Laws of 2023, item 40, 572, 1463, 1688)</p>	<p>Until 31 December 2025, having a development strategy for the Municipality of Łódź is not mandatory (however, the City of Łódź already has such a strategy). From 1 January 2026 onwards, the municipal development strategy will be mandatory. The development strategy for Łódź must be consistent with the development strategy for Łódzkie Voivodeship. The strategy for Łódź will have to define, inter alia, the model of</p>

Legal area	Key legislation	Summary of the act's requirements for stakeholder engagement
strategy of Łódzkie Voivodeship, local and regional public policies, development programmes, etc. ("strategic documents")	<p>Act of 5 June 1998 on county self-government (Journal of Laws of 2024, item 107)</p> <p>Act of 5 June 1998 on province self-government (Journal of Laws of 2024, item 566)</p> <p>Act of 6 December 2006 on the principles of development policy (Journal of Laws of 2024, item 324.)</p> <p>Act of 3 October 2008 on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws of 2023, item 1094, 1113, 1501, 1506, 1688, 1719, 1890, 1906, 2029)</p>	<p>the functional and spatial structure of the municipality, including the main elements of technical infrastructure (thus potentially including the ERF). The Łódź City Council (RMŁ) will adopt a resolution outlining the detailed procedure and timetable for the development strategy project, including the consultation procedure. The draft strategy is prepared by the Mayor of Łódź. The Board of Łódzkie Voivodeship is the opinion-forming body. The development strategy for the city of Łódź is adopted by the RMŁ.</p> <p>The development strategy for the Łódź Region must take into account, inter alia, the following objectives: increasing the level of competitiveness and innovativeness of the economy, preserving the values of the cultural and natural environment while taking into account the needs of future generations, shaping and maintaining the spatial order. The regional development strategy must be coherent with the medium-term national development strategy and the national development strategy for regions. A draft regional development strategy is prepared by the region's Board. The Sejmik of Łódzkie Voivodeship shall determine, by means of a resolution, a detailed procedure and schedule for the draft of the municipal development strategy, including the consultation procedure. The resolution is to be published in the Official Journal of Łódzkie Voivodeship.</p> <p>Draft development strategies and public policies are subject to reviews and agreements with institutional stakeholders (neighbouring municipalities, associations of municipalities in Łódzkie Voivodeship, inhabitants, social organisations and NGOs, business organisations, trade unions, Polish Waters State Water Holding (PGW Wody Polskie), the Joint Commission of the Government and Local Government, government administration in the region, universities and scientific and research institutes). The entity preparing the draft development strategy carries out evaluation of relevance, expected effectiveness and efficiency of the strategy's implementation. Strategic documents (development strategies, public policies, development programmes and programmes for the implementation of partnership agreements) must take into account the conclusions of the previously conducted analysis of the social, economic and spatial situation, including functional areas. An announcement about the consultations, the address of the website on which the draft is posted, the deadline (at least 35 days) and the method of submitting comments on the draft strategy or public policy, as well as the venue of the consultation meetings must be published on the website and optionally in the regional press. A report is then drawn up based on the consultation (up to 30 days), responding to the comments made, with justifications provided. The report is posted on the website. In addition, after the consultations, the draft regional development strategy is reviewed and agreed with the key stakeholder, the Minister for Regional Development. The Łódź Regional Development Strategy is then adopted by the Sejmik of the Region.</p> <p>Draft strategic documents are subject to a strategic environmental impact assessment and require the preparation of an environmental impact forecast also subject to public consultation, in accordance with the procedure described below.</p>
draft spatial planning acts covering the ERF area (general plan for the City of Łódź, local spatial development plans, spatial development plan of Łódzkie Voivodeship, spatial development plan of the urban functional area of Łódź)	<p>Act of 27 March 2003 on spatial planning and development (Journal of Laws of 2023, item 977, 1506, 1597, 1688, 1890, 2029, 2739)</p> <p>Act of 3 October 2008 on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws of 2023, item 1094, 1113, 1501, 1506, 1688, 1719, 1890, 1906, 2029)</p>	<p>The spatial planning reform, which came into force in the 2nd half of 2023, has significantly strengthened stakeholder participation in the adoption of spatial planning acts. The Act requires: the collection of requests concerning a particular draft spatial planning act before it is drafted, the publication of a list of the collected requests with a proposal for their implementation and the relevant justification, the publication of draft acts in a special public register along with an environmental impact forecast, the agreement of the draft acts with certain institutional stakeholders, the obtaining of an opinion on the draft from certain institutional stakeholders, the re-publication of the draft after changes resulting from the agreements and opinions obtained. In addition, in the case of acts at the municipal level, mandatory multi-stage public consultations must be announced (including in the press, on the Internet, and through announcements in the relevant local authority offices) and subsequently carried out. Their purpose is to enable stakeholders to participate in spatial planning and to enable the authorities to learn about stakeholder needs, positions, and ideas concerning the draft. A report should be prepared following the consultations and made available to the public. The consultations should be carried out in a way that allows for active participation of stakeholders, including people with special needs, respecting the spirit of openness and accessibility, and using information provided in a non-specialist language. The new regulations significantly expand the catalogue of possible consultation tools. The possible forms are divided into compulsory and auxiliary forms (collecting reviews, meetings, panels, workshops, study visits on site, surveys and geo-questionnaires, interviews, consultation points, designers' office hours). The consultations last at least 28 days at each stage. Spatial planning acts are also subject to a strategic environmental assessment.</p> <p>The general plan is a planning document adopted for the entire area of the city and is an act of local law. The findings of the general plan will be binding both for local plans and for decisions on land development conditions and decisions on the location of public purpose investments. The ERF site is not covered by a local development plan and there is currently no procedure underway to adopt a local plan for the site, but it may be initiated in the future.</p> <p>A summary of stakeholder engagement with existing spatial planning acts is presented in Table A4.1.</p>
draft regional waste management	Act of 14 December 2012 on waste (Journal of Laws 2023,	The draft waste management plan for Łódzkie Voivodeship (the WMP) contains, among others, an as-is analysis of waste management in Łódzkie Voivodeship, projected changes, adopted objectives with deadlines for their attainment, directions for the

Legal area	Key legislation	Summary of the act's requirements for stakeholder engagement
plans for the Łódź Voivodeship (WMP)	item 1587, 1597, 1688, 1852, 2029) Act of 3 October 2008 on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws of 2023, item 1094, 1113, 1501, 1506, 1688, 1719, 1890, 1906, 2029)	prevention of waste generation and for the development of the waste management system (including criteria for the location of relevant installations or plants), a schedule, an investment plan, and a summary drafted in a non-specialist language. The WMP may contain data on information campaigns and on informing the public or a specific group of people about waste management. The WMP is drafted by the Voivodeship's Board. The WMP must be subject to the opinion of the executive bodies of the Voivodeship's municipalities, including the Mayor of the City of Łódź, the metropolitan associations and PGW Wody Polskie and the Minister of Climate and Environment. The draft investment plan for the WMP is subject to agreement with the Minister of Climate and Environment. The WMP is subject to a strategic EIA (as described below), including public consultations with stakeholders which must be reported on and annexed is to the plan. The WMP is adopted by the Sejmik of Łódzkie Voivodeship and is updated at least every 6 years. The ERF is included in the current WMP 2019 (Table A4.1).
Draft guidelines for the plans to supply the City of Łódź with heat, electricity and gas fuels	Act of 10 April 1997, Energy law (Journal of Laws of 2024, item 266)	The law obliges Veolia Łódź, as a heat distributor (including the ERF), to cooperate with the entities connected to the network and the city of Łódź in drawing up its development plan for meeting the current and future energy demand for its area of operation. The Veolia Łódź development plan must be consistent with the strategic documents of the municipality and the Region. The stakeholder, the Mayor of the City of Łódź, drafts the guidelines for the plan for supply of heat, electricity and gas fuels for a period of 15 years and updates them at least once every 3 years. Veolia Łódź is obliged to make its development plan available to the Mayor. The stakeholder providing its opinion on the draft guidelines is Łódzkie Voivodeship's Self-Government. The draft assumptions are subject to public consultations: they are made available for public scrutiny for a period of 21 days, notifying, in the manner customary in Łódź, the stakeholders who may submit motions, requests, objections and comments, and these are then considered by the Łódź City Council. The guidelines for the plan are then adopted by the City Council.
ERF environmental (and social) impact assessment ("ESIA") and environmental decisions	Act of 3 October 2008 on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws of 2023, item 1094, 1113, 1501, 1506, 1688, 1719, 1890, 1906, 2029)	The ERF is classified as a project which may always exert a significant impact on the environment, therefore a obtaining decision on the environmental conditions for the ERF (environmental decision) preceded by an environmental (and social) impact assessment (ESIA) procedure is obligatory, as is the accompanying obligation of public consultation. Despite the name, in Poland these proceedings also cover social aspects that are legally required. As a rule, the environmental decision starts the investment process, establishes the key parameters and assumptions of the ESIA, and is the prerequisite for applying for further decisions (WZ – the decision on land development conditions, PnB – building permit, integrated permit, etc.), which must be consistent with the environmental decision. The environmental decision may require a repeat EIA before further decisions (e.g. planning permission) can be issued. The environmental decision for the ERF is issued by the Mayor of the City of Łódź, and the conditions must be agreed with the RDOŚ and subject to opinion by the following stakeholders: the Sanitary and Epidemiological Inspectorate (Sanepid), PGW Wody Polskie and Marshall of Łódzkie Voivodeship. The investor must prepare a report on the environmental impact of the ERF (cumulative impact including other projects, all stages of the ERF's "life", analysis of the impact on the natural and human environment and material assets, analysis of alternative locations, summary drafted in non-specialist language) ("ESIA report"), which is subsequently verified by the Mayor of Łódź. The first category of stakeholders in the ESIA are the parties to the proceedings: immediate neighbours within 100 m of the site's boundaries, owners of plots where environmental quality standards (e.g. noise) would be exceeded. The second category of stakeholders in the ESIA are environmental organisations (i.e. those that have environmental or nature conservation activities included in their statutes and have existed for at least 12 months), which can join the ESIA proceedings as a party. An environmental NGO may participate in these proceedings, it must be notified of the stages of the ESIA, and it may submit requests for evidence. The NGO also has the right to review the files, be informed about the progress of the case, appeal the decisions issued in the course of the case, file an appeal against the decision even if it did not participate in the first instance proceedings (14 days) or appeal the second instance decision to the administrative court. The third category of stakeholders in the ESIA is the public, which may participate in public consultations, the organisation of which is mandatory. Violations of the rules of public consultations are handled by administrative courts with due strictness. Public consultations consist, inter alia, in: disclosure (in the Public Information bulleting BIP, on the authority's website, notice board, in the press, etc.) of information on the initiation of the ESIA proceedings, its subject, the competent authority and the possibility to participate in the consultations, the possibility to read the documentation of the proceedings and submit comments and requests within 30 days, and, optionally, the possibility to organise a hearing open to all stakeholders. Any stakeholder may participate in public consultations. The Mayor of Łódź is obliged to consider and react to the comments and requests by the stakeholders (in the consultation report) and address such comments or requests in the Mayor's decision justification. Once the environmental decision has been issued, the Mayor discloses the fact that it has been issued and is now accessible (in the BIP, on a notice board, etc.) and is now accessible, and publishes its contents for a period of 14 days (from 2021). For the ERF, the ESIA was carried out twice: before the environmental decision in 2010 and before the issuance of the building permit in 2021. (Table A4.1). At the operation

Legal area	Key legislation	Summary of the act's requirements for stakeholder engagement
		stage, the procedure analogous to the ESIA is the environmental review of the installation (see below).
other administrative decisions concerning the ERF	<p>Act of 7 July 1994. - Building Law (Journal of Laws 2023, item 682, 553, 967, 1506, 1597, 1681, 1688, 1762, 1890, 1963, 2029)</p> <p>Act of 27 April 2001. - Environmental Protection Law (Journal of Laws of 2024, item 54)</p> <p>Act of 20 July 2017. - Water law (Journal of Laws 2023, item 1478, 1688, 1890, 1963, 2029)</p> <p>Act of 27 March 2003 on spatial planning and development (Journal of Laws of 2023, item 977, 1506, 1597, 1688, 1890, 2029, 2739)</p> <p>Act of 10 April 1997. - Energy law (Journal of Laws of 2024, item 266)</p>	<p>For the implementation of the ERF, a large number of administrative decisions and orders have been and will be required by various stakeholders, agreed upon and subject to opinion by other stakeholder bodies, some of which also require an EIA and/or public consultation.</p> <p>These include decisions issued by:</p> <ul style="list-style-type: none"> • Mayor of the City of Łódź: environmental decision (and its "extension" and "transfer" to a new Investor), decision on land development conditions, decision on building permit, decision on amending the building permit, water permits, permits to remove trees and shrubs – some of them require public consultations as well as agreements and opinions from other institutional stakeholders • The regional environmental protection inspectorate RDOŚ in Łódź: decisions on environmental conditions for the decision of the Mayor of Łódź, • Marshall of Łódzkie Region: integrated permits requiring public consultation, • Construction supervision inspectorate in Łódź (PINB) – occupancy and use permission for the ERF issued with approval from with the local Sanitary and Epidemiological Station (Sanepid), Fire Brigade and the Environmental Protection Inspectorate in Łódź (WIOŚ), • Energy Regulatory Authority (URE): licence to carry out economic activity in the field of heat generation and electricity generation. <p>Environmental organisations may participate as a party in the issuance of many of these decisions (from 2021 they may be a party to all decisions for which an environmental decision is required, e.g. coning decision, BP, integrated permit and others). Upon joining, an environmental organisation / NGO must be notified of the stages of the proceedings, it may submit requests for evidence, it has the right to review the relevant files and documents, it must be informed of the course of the case, it may challenge the decisions issued in the course of the case and file an appeal against the decision, even if it did not participate in the first instance proceedings; it can also challenge the second instance decision to the administrative court.</p> <p>A summary of stakeholder involvement in issuing decisions so far obtained for the ERF is presented in Table A4.1.</p>
environmental protection reviews, complaints, environmental inspections of the ERF	<p>Act of 27 April 2001. - Environmental Protection Law (Journal of Laws of 2024, item 54)</p> <p>Act of 20 July 1991 on Environmental Protection Inspection (Journal of Laws of 2024, item 425)</p> <p>Act of 13 April 2007 on the prevention and remedying of environmental damage (Journal of laws of 2020, item 2187)</p> <p>Act of 10 April 1997 - Energy law (Journal of Laws of 2024, item 266)</p>	<p>In the event of ascertaining circumstances indicating the possibility of a negative impact of the ERF's operation on the environment, the relevant environmental protection authority (Mayor of Łódź, Marshal of Łódzkie Region, Sejmik of Łódzkie Region, the RDOŚ – the environment protection directorate) may oblige the Investor to prepare and submit an environmental protection review. The scope of the review is similar to that of the ESIA report.</p> <p>As a stakeholder, the WIOŚ (the environment protection inspectorate) will be able to control the ERF in terms of, inter alia, compliance with environmental regulations, including parameters indicated in permits and permissions, regulations on waste and waste management, prevention of accidents and supervision of their effects, prevention of damage to the environment, compliance with regulations on the greenhouse gas emission trading scheme (if they are pertinent to the ERF). The results of measurements of emissions from the ERF, as it is indicated in the environmental decision of the WIOŚ, will be reported to the WIOŚ on an ongoing basis. The WIOŚ also prosecutes environmental offences and can carry out scheduled (with prior notice) and unscheduled inspections at the ERF (at the request of other authorities, e.g. the Mayor, or following complaints and interventions by stakeholders). Anyone can file a complaint with the WIOŚ. The WIOŚ has the right to impose a fine, to file a request for punishment to the court and even the right to take a decision requiring the entity in question to stop the activity carried out in violation of the relevant environmental protection regulations or decisions.</p> <p>In addition, during the construction (and operation) phases, inspections may be carried out (also as a result of complaints from other stakeholders) by, among others: the PINB (the construction supervision inspectorate) (obligatory after completion of the construction stage, before commissioning), Sanepid (hygiene, health and safety) and the State Fire Service (compliance with fire regulations), the regional labour inspectorate (compliance with labour rights), the road transport inspectorate (scrutiny of drivers and the technical condition of trucks entering and leaving the ERF).</p>
strategic environmental impact assessments of strategic documents covering the ERF ("strategic EIA")	<p>Act of 3 October 2008 on providing information on the environment and its protection, public participation in environmental protection and environmental impact assessments (Journal of Laws of 2023, item 1094, 1113, 1501, 1506, 1688, 1719, 1890, 1906, 2029)</p>	<p>A strategic EIA is carried out for documents prepared or adopted by administrative bodies or other entities exercising public functions. These include, inter alia, spatial planning acts, development strategies, policies, other strategies, plans and programmes in the field of industry, energy, waste management, land use, environmental protection, as well as other documents, the implementation of which may cause significant environmental impacts ("strategic documents").</p> <p>The first stage of a strategic EIA is the preparation of an environmental impact forecast ("EIF"), the scope and level of detail of which must be agreed in advance with the stakeholders: the RDOŚ (the environment protection directorate) and Sanepid (hygiene, health and safety). The EIF can be regarded as comparable to an EIA report from a "regular" EIA (see above). The EIF must be consulted by the stakeholders who agreed on its scope, and a larger number of stakeholders are involved with spatial planning acts (as described above). The body developing the draft strategic document must carry out public consultation, which consists of: disclosure (publication) of information about the development of the draft strategic document and its subject matter, the guidelines exposed to public scrutiny or the draft strategic document (depending on the stage), the</p>

Legal area	Key legislation	Summary of the act's requirements for stakeholder engagement
		<p>EIF, the opportunity to submit comments and proposals (over 21 days), the consideration of comments and proposals and the preparation of a consultation report with an explanation of how the comments were considered. Before the adoption of the strategic document, the drafting entity shall take into account the findings of the EIF, the opinions of the authorities and consider the comments and applications submitted in relation to public participation. After the adoption of the strategic document, information on such adoption and the possibility to read the strategic document shall be announced. If necessary, public consultations may have to be repeated (stages).</p>
<p>principles and procedures for public consultations in the City of Łódź on strategic documents related to the ERF (ZKSŁ)</p>	<p>Resolution No. XX/786/20 of the City Council of Łódź, dated 19 February 2020 on the introduction of the Rules and Procedures of Social Consultations in the City of Łódź (Łódzkie Region's Official Journal of Laws No. 1636 as amended)⁶</p> <p>Instructions for conducting public consultations with the citizens of Łódź⁷</p>	<p>According to the Principles and procedures for public consultations in the City of Łódź (ZKSŁ), the purpose of public consultations is to shape the sense of responsibility for the city, improve the quality of cooperation between the bodies of the City of Łódź and its inhabitants, and strengthen and develop the idea of the local government community of the City of Łódź. Public consultations are to be based on the following principles: dialogue and partnership, universality, transparency and simplicity, coordination (the Mayor is responsible for conducting consultations and implementing their results), predictability, respect for what is in the best public interest (decisions made as a result of consultations should be driven by the benefit of the general public). Public consultations are carried out in matters defined by statutes and in matters important to the City of Łódź and its inhabitants. Consultations may be conducted on the Mayor's initiative or at the request of: 200 residents, 5 civil society organisations, 5 councillors, the Chair of the City Council, the City Council of Seniors or the City Youth Council. A notice of the consultation with the materials which are the subject of the consultation shall be published at least 7 days prior to its commencement on the City Council's website and in the Public Information Bulletin (BIP). The forms of consultation are divided into, first, obligatory (at least one minuted public consultation meeting, on-site or remote, with residents able to present their proposals and opinions, and at least one workshop, on-site or remote, for residents to enable them to acquire information about the project under consultation, and the formulation by the participating stakeholders of a solution to be considered) and second, optional (office hours devoted to consultations and offered in municipal public spaces, collection of proposals and opinions in writing, including by electronic means, other forms of contact ensuring the possibility of communicating and exchanging proposals and opinions, if this is provided for by separate provisions of law). The forms of communication are chosen by the Mayor. Up to 30 days (exceptionally up to 60 days) after the end of the consultations, a report on the consultations is published in the Public Information Bulletin and on the City's website. Public consultations are valid regardless of the number of participants. They are not binding, but must be taken into account in decision-making.</p> <p>The public consultation is carried out according to an annual schedule. Phase 2 of the public consultation of the "Municipal and Environmental Policy 2030+" is scheduled for Q4 2024 (Phase 1 of the consultation is described in Table A4.1).</p>
<p>petitions, requests and comments from stakeholders</p>	<p>Act of 11 July 2014 on petitions (Journal of Laws 2018, item 870)</p>	<p>Anyone can submit a petition to a public authority (e.g. the Mayor of Łódź, the City Council of Łódź, the Łódź Voivode, the Łódź Voivodeship Executive Board, the RDOŚ (the environment protection directorate), etc.). A petition may be in one's own interest, someone else's interest or in the public interest (concerning a community, values requiring special protection to ensure common welfare). A petition may concern any matter, especially changes to the law, taking a decision or other action by the petitioner. There are no requirements as to the form of the petition, what matters is its substance only. A group of people may sign a petition by appointing a representative (each of the signatories must provide their details). The petition may be submitted in writing (by post, at an office, by fax) or electronically (in which case the e-mail addresses of the petitioners must be provided). Scans of all petitions received (with the names of the authors if they agree to publication of their personal details) and information on the progress of the petition (date of expected outcome, opinions of other stakeholders, etc.) shall be posted on the website of the addressee of the petition. The authority has a maximum of 3 months to address the petition, and this period may be extended only once, for a maximum of another 3 months. If several petitions are submitted on the same issue, they may be considered together and a period of no more than 2 months may be advertised on the website for the submission of further petitions on that issue (multiple petitions). A response to the petition featuring a justification shall be posted on the addressee's website. Local authorities shall publish a summary of petitions for the previous year on their websites by 30 June each year.</p> <p>Since the introduction of the possibility to submit complaints in mid-2015, no summary or compilation of petitions submitted to: the Mayor of Łódź, the RML, the SWŁ and the RDOŚ mentions the ERF – although in social media some stakeholder groups have announced the submission of such petitions.</p>

3.3. EBRD requirements

EBRD-financed projects must comply with the requirements of the EBRD's 2019 Environmental and Social Policy.⁸ ("2019 Environmental and Social Policy", "ESP 2019") which contains 10 performance requirements ("Performance Requirements" – "PRs") in key environmental and social areas that must be met by funded projects. Performance Requirement 10 ("PR10") relates to disclosure and stakeholder engagement. Detailed guidance is provided in Guidance note 10 ("GN10") to PR10.

The EBRD has also implemented an independent IPAM control mechanism (described in chapter 7.2) as a last resort for complaints.

ESP 2019 defines stakeholder engagement as a continuous process consisting of:

- identification and analysis of stakeholders who may be affected by the project and/or have an interest in the project,
- planning cooperation with stakeholders,

- disclosure (publication) of an appropriate amount of information,
- meaningful consultation and public participation leading to the investors taking into account the point of view of the parties affected by the project on matters that affect them,
- an effective complaints and applications procedure,
- ongoing reporting to stakeholders.

It is important to carefully identify stakeholders, defined as the various persons or groups who (i) are or may be (directly or indirectly) affected by the project or (ii) may have an interest in the project. ESP 2019 places particular importance on the identification of stakeholders affected by project implementation who, due to their specific circumstances, may be disadvantaged or vulnerable (“vulnerable stakeholders” or “vulnerable groups”). Based on this identification, individuals or groups must be identified who may have different concerns and priorities regarding project impacts, mitigation mechanisms and benefits, and who may require different or distinct forms of engagement.

ESP 2019, PR10 and GN10 indicate in detail the scope of requirements for the development and implementation of a Stakeholder Engagement Plan (SEP). The SEP should describe how engagement with identified stakeholders will be conducted throughout the project lifecycle, including the timing and methods of engagement, the information to be disclosed, the language of disclosure and the type of information to be obtained from stakeholders. The SEP must take into account the main characteristics (including gender) and interests of affected parties and other stakeholders and distinguish between different levels and methods of engagement. The SEP should indicate the resources available for stakeholder engagement and must be updated as necessary during the project life cycle. For Category “A” projects, ESP 2019 and PR10 require a formalised, participatory process of disclosure and meaningful consultation at each stage of the project life cycle. It is also required to organise an effective procedure for handling and managing grievances and complaints.

In addition, GN10 also refers to the requirements of the Multilateral Working Group of Financial Institutions Environmental and Social (MFI) standards. The PR10 and other operational requirements of ESP 2019 for disclosure, collaboration with and stakeholder engagement are in line with the requirements of Equator Principles EP4 of July 2020.

This Stakeholder Engagement Plan (SEP) has been developed in line with these requirements on the assumption that the ERF is a Category “A” project according to ESP 2019. For such projects, specific requirements are outlined in PR10 and GN10, including

4. Previous stakeholder engagement

4.1. Summary of activities

So far, stakeholder engagement has taken place from the earliest (conceptual) stage of the ERF project and has been conducted in a multi-faceted manner:

- by successive investors (by the City of Łódź and then by Veolia Polska),
- through disclosure (formal and auxiliary channels) and factual and public consultation (formal and auxiliary),
- on a formal level (public consultations, agreements, opinions, administrative and judicial-administrative proceedings) and through information and education campaigns (addressed to different groups, conducted through different forms and channels),
- at the level of strategic documents concerning the ERF (e.g. strategic EIA of the region’s waste management plans, study of the conditions and directions of spatial development of the city of Łódź, etc.) and at the level of administrative decisions concerning the ERF (environmental decision, decision on

the need for formal meaningful consultation and the requirement to develop a “full-scale” SEP.

3.4. Investor's own standards and procedures

Veolia Polska has adopted the Policy of the Integrated Management System of the Veolia Group in Poland, in which it has committed to conduct and develop its business in a sustainable manner, caring for the safety and continuous development of its employees, taking into account the impact on the environment and engaging with local communities. According to the document, Veolia Polska's sustainable development is based, among others, on the following commitments:

- reducing environmental impact, mainly by aiming for widespread use of the Closed Circuit Economy concept, sustainable use of natural resources by implementing modern solutions to reduce the consumption of raw materials and energy and by promoting the recovery of raw materials from waste,
- caring for employees through: employee volunteering programmes and building a community of volunteers,
- Commitment to local communities through: cooperating with local communities to improve the environment and living conditions in cities, cooperating with universities, supporting vocational education and cooperating with non-governmental organisations, pursuing Veolia Polska Foundation's goals related to the development of local communities, increasing environmental awareness and pro-environmental attitudes, promoting local sport and cultural initiatives with a sustainable purpose and character.

In line with this policy, Veolia Polska has implemented a certified management system at its companies in Poland that meets standards that also cover certain aspects of stakeholder engagement.⁹ In 2020, Veolia implemented a strategic 'Impact Plan 2023', which emphasises environmental, social and corporate governance (ESG) issues. In 2023, Veolia introduced the 'ESG Reporting' project to prepare the Group for the requirements of the Corporate Sustainability Reporting Directive, which Veolia Polska companies will be subject to from 2026 (for 2025).

Also, ERF's chosen general contractor (Doosan) has obtained a number of international certifications in quality and environmental management, which to some extent also include working with stakeholders (especially subcontractors and employees).

In addition, the ERF will be subject to BREEAM International New Construction 2016 certification. This standard also includes requirements for documented meaningful consultation during the preparation and design phases.¹⁰

development conditions, building permit), including two ESIA's for the ERF (ESIA issued in 2010 and EIRA in 2021),

- at the level of many different stakeholders and their groups: administrative bodies, including local authorities, residents, social and economic organisations,
- in various channels and forms tailored to different stakeholder groups (forms, meetings and discussions, consultation points, study tours, information published online, in the press, on the radio and television, in printed leaflets, posters, presentations at industry conferences, etc.),
- adaptation during the Covid-19 pandemic (including at the time of the EIRA in 2021) of stakeholder engagement methods to meet health security requirements, particularly through implementation of forms of remote consultation.

From the earliest stage of the Project, the Investors (City of Łódź and Veolia Polska) have disclosed (published) the most important information about the Project (both as a result of legal requirements and auxiliary information, e.g. in the form of

environmental (and social) impact reports, Project descriptions on websites, press releases, etc.), cooperated with waste management experts, conducted public opinion surveys to obtain feedback on opinions and concerns of stakeholders regarding the ERF.

Meaningful consultations (including public consultations), concerning the ERF also took place from the earliest stages (and even preceded work on the Project, e.g., the documents providing for the construction of TWCF (ERF) in Łódź were consulted and adopted even before the Project's preparatory stage began). This applied both to strategic documents taking into account the ERF and to proceedings related to decisions concerning the Project itself. The Investors actively participated in public consultations, provided explanations and answers to questions.

The Veolia Polska also works closely with the City of Łódź authorities, as most of the relevant administrative decisions were issued by the City (environmental decision, land development conditions decision, building permit decision). The authorities of Łódzkie Voivodeship have also played an important role in the process (issuance of the integrated permit). Both of these stakeholders play a key role in the adoption of strategic documents directly or indirectly concerning the ERF and requiring formal public consultation and agreement with other stakeholders (spatial development plans, waste management plans, heat and electricity supply plans, development strategies, environmental protection programmes, etc.). A very important role is also played by the Regional Director for Environmental Protection in Łódź (the RDOŚ), whose competences include agreeing (granting binding consent) all existing and future administrative decisions related to the ERF.

The Veolia Polska took all this feedback into account in making decisions regarding the Project.

Table A.4.1 summarises the involvement of stakeholders to date in relation to the ERF Project resulting from legal requirements – divided into, in accordance with the Aarhus Convention (implemented in Polish law), into consultation on draft documents (A4.1.1) and administrative decisions concerning the ERF (A4.1.2).

4.2. Lessons learned from stakeholder engagement to date

The ERF raises the concerns of some local stakeholder groups, as well as some local and nationwide ecological NGOs. These objections mainly concern:

- opposition to either thermal waste treatment with energy recovery per se (stakeholders with this attitude generally reject thermal waste treatment in general) or to the energy recovery technology planned for use at the ERF (postulating, for example, a new unproven plasma method instead of the proven grate burner technology),
- concerns about possible emissions from the ERF (in particular related to furans, dioxins and other carcinogens) affecting the health of residents (the nearest residential buildings are as far away as over 600 m) and the alleged lack of research into the impact of these substances on human health,
- concerns about the possibility of emission of foul odours due to temporary storage of waste before thermal treatment,
- concerns about exceeded nickel content levels in municipal waste in Łódź,
- location-based concerns, including cumulative ones: construction of a 60-metre-high chimney, distance from the airport in relation to the height of the chimney, location and distance of the ERF from the residential buildings (more than 600 m), concentration of 3 objects affecting residents of the Chrobry estate (the ERF, CHP4 and crematorium at Zakładowa Street), cumulative impact on air quality from the ERF and CHP4, and the possibility of a serious accident threatening human health and life,

- alleged methodological errors in the ESIA report, e.g.: frequency of measurement of emissions from the chimney (once every 6 months), lack of analysis of the cumulative impacts of the ERF on other developments in the area, discrepancies and ambiguities, the methodology for calculating the calorific value of waste in Łódź,
- the overcapacity of the ERF, in the opinion of some stakeholders, which raises, in their view, concerns about the possibility of importing fuel from outside Łódzkie Voivodeship, efficiency of the ERF compared to the efficiency of the municipal waste sorting plant in Lublinek,
- reservations of an economic nature, e.g.: a general lack of economic and environmental justification for the Project, loss of the environmental value of the Widzew district, the share of electricity and heat produced by the ERF in the total electricity and heat used in Łódź,
- a protest, during ESIA, was also lodged, without any supporting comments or justification provided.

All of these comments and reservations were duly considered and addressed, and the authors of the ESIA report were asked to provide clarifications to stakeholder comments. For most of the comments and requests, the explanations provided by the authors of the ESIA report were accepted, by the authority conducting the proceeding, as sufficient and some comments were approved, after which the ESIA report was amended (addendum of 14.06.2010). It was the same with the EIRA report, to which the authors also provided answers to the questions (addendum of 25.03.2021). In addition, the Mayor of Lodz provided clarifications for all groups of stakeholders who had submitted comments or requests. This has been reflected in two administrative decisions regarding the ERF (Environmental Decision and Building Permit) and in their formal justifications. These decisions include appropriate mitigation measures for the identified and assessed environmental and social risks and impacts.

The ESIA and EIRA reports, including addendums, as well as both administrative decisions with justifications containing references to concerns and objections from ESIA and EIRA proceedings as well as mitigation measures, are disclosed and publicly available, as described in Section 6.

Moreover, some stakeholder groups also publicly expressed concerns regarding the implementation of ZOE based on the zoning decision ("ZD") (see table A4.1.2), instead of a decision determining the location for a public purpose. This issue was raised in the justification of one of the cases before the administrative courts and was dismissed.

Compared to the social conflicts recently caused by investment projects in waste transformation facilities in some other cities in Poland (e.g. Wrocław, Suwałki, Inowrocław, Zduńska Wola, Bielsko-Biała), their intensity in Łódź can be described as relatively low in terms of the scale and degree of social engagement.

Public opinion polls performed among the residents of Łódź consistently show relatively high public support for energy recovery from waste (at around 50%).

The active stakeholders expressing opposition to the ERF are two environmental organisations based in Łódź and one nationwide organisation based in Oświęcim. These stakeholders have used the possibility to act as parties to the administrative proceedings, and most of the appeals they have submitted to higher instance authorities and to the administrative court have already been legally rejected. At present, one more complaint from a nationwide environmental organisation based in Oświęcim against the second "extension" of the Environmental Decision of 20 June 2016 is still pending at the last instance (at the Supreme Administrative Court). These complaints were lodged based mainly on formal issues.

The ERF is supported or at least not opposed by institutional stakeholders, such as the City and the local authorities in the region, the Voivodeship's administration including the Voivode, the RDOŚ, Members of Parliament from Łódzkie Voivodeship (representing both the governing and opposition parties), and the local authorities of the municipalities neighbouring Łódź.

In discussions regarding the ERF (during consultations as well as in information channels), in addition to objections, there are often voices of support and positive expectations expressed for the construction of the ERF as an instrument ensuring a rational solution to some of the waste management problems in Łódzkie Voivodeship, especially harmful landfills.

Table A4.1 Summary of formal stakeholder engagement to date.

Document/decision/action	Summary of stakeholder engagement
A4.1.1. Consultation, opinion, agreement of documents concerning the ERF	
Strategy for the Development of the Łódź Region 2030 ("ŁDS 2030")	<p>The ERF is included indirectly in ŁDS 2030 under the strategic objective "Attractive and accessible space" (which includes, inter alia, adaptation to climate change and improvement of environmental quality) in the operational objective 3.5 "Rationalisation of waste management" under the direction of actions entitled "Development of infrastructure towards a closed-loop economy" and action entitled "Improvement of the system of installations (...) for thermal transformation of municipal waste or waste remaining after municipal waste processing with energy recovery, through the construction, expansion and modernisation of such installations".</p> <p>The draft ŁDS 2030 was subjected to a strategic ESIA, including meaningful and public consultations in two stages, in which any stakeholder could participate. 763 remarks and proposals were submitted from 142 stakeholders. All remarks were considered, of which 399 were taken into account, 106 were partially taken into account, 20 were assessed as requiring further analysis, 201 were not taken into account, and 17 were opinions only. None of the remarks referred to the ERF, although some of the proposals postulated thermal waste treatment facilities, with the reaction to the proposals identifying WMP 2019 (see below) as the document addressing this issue. Some of the comments concerned the emphasis of the conversion of waste into raw materials in line with the concept a circular economy, which indirectly may also apply to the ERF. Other municipalities postulated the construction of an TWCF in their areas as well. These comments were taken into account as indicative (without a specification of a particular location). The comments taken into account were introduced into the draft ŁDS 2030.</p> <p>ŁDS 2030 was adopted by Resolution No. XXXI/414/21 of the Łódź Regional Assembly on 6 May 2021 and published in the BIP.¹¹</p> <p>An update of the ŁDS 2030 is currently underway due to statutory changes. An announcement about the possibility to submit comments and proposals for the guidelines to this update through a dedicated form was published in the BIP of the Voivodeship on 29 February 2024¹². Comments, remarks and proposals could be submitted over the period of 21 days. The procedure is ongoing.</p>
Environmental Protection Programme for Łódzkie Voivodeship 2012 ("Environmental Programme 2012", "EPP 2012")	<p>The ERF was included in EPP 2012 within the established objectives and directions of activities for the waste management system, as an activity under "municipal waste": "construction of a thermal waste conversion plant" and as an investment task entitled "Construction of a Thermal Waste Conversion Installation" assigned to the First Investor (the City of Łódź) and with the location of the ERF indicated in the document.</p> <p>EP 2012 was subjected to a strategic EIA, but the documentation of this procedure is no longer available on the BIP and it is not possible to determine whether any comments or remarks concerning the ERF were submitted during the public consultation round.</p> <p>EP 2012 was adopted by Resolution No. XXIV/446/12 of the Łódź Voivodeship Assembly/Sejmik Województwa Łódzkiego of 29 March 2012 and published in the BIP.¹³</p>
Łódzkie Voivodeship Environmental Protection Programme 2016 for the years 2017-2020 with an outlook to 2024 ("EPP 2016")	<p>The ERF was included in EPP 2016 under objective GO.I. "Waste management in accordance with the waste hierarchy, taking into account sustainable development of Łódzkie Voivodeship", part of activity direction GO.2. "Improvement of the municipal waste management system" as task GO.2.6. "Construction, development of installations for thermal processing of municipal waste and waste remaining after municipal waste processing".</p> <p>The draft EPP 2016 was developed by the Board of Łódzkie Voivodeship. The draft was subjected to a strategic environmental impact assessment, including public consultations. The scope of the environmental impact forecast was determined by the RDOŚ (14 March 2016) and Sanepid (26 March 2016). The developed draft, including the environmental impact forecast, was subjected to the opinion procedure by the RDOŚ (negative opinion on 14 November 2016 and positive opinion on 24 November 2016) and Sanepid (positive opinions on 26 October 2016 and 01 December 2016). The public consultation of the draft EPP 2016 lasted from 13 October 2016 to 02 November 2016. The announcement of the public consultation was published in the BIP, in the regional press (Dziennik Łódzki, 12 October 2016) and on the notice board of the Marshal's Office. Comments and remarks could be submitted in writing by post, orally for the record at the Office of the Marshal, by email and via a special web application¹⁴. During the public consultation period, 189 comments and requests were submitted, which were considered and mostly taken into account. None of these concerned the ERF or energy recovery from waste in general.</p> <p>EPP 2016 was adopted by Resolution No. XXXI/415/16 of Łódzkie Voivodeship Assembly of 20 December 2016 and published in the BIP.¹⁵</p>
Łódzkie Voivodeship Environmental Protection Programme for the period 2021-2024 with an Outlook to 2028 ("EPP 2021")	<p>The ERF is indirectly included in EPP 2021 as it contains a reference to the tasks in the waste management area included in ŁDS 2030 with regard to the construction of thermal waste conversion facilities with energy recovery (see above).</p> <p>The draft EPP 2021 was developed by the Board of Łódzkie Voivodeship and subjected to a strategic EIA. The scope of the EIA was agreed by the following stakeholders: the RDOŚ (11 May 2020) and Sanepid (23 July 2020). The draft EIA 2021 was opinionated by the following stakeholders: the Minister of Climate and Environment (with comments submitted, 15 July 2021), the RDOŚ (positive opinion, 29 March 2021) and Sanepid (positive opinion 03 January 2021). The public consultation was conducted for 21 days (18 February 2021 – 11 March 2021). An announcement about the start of the consultations was published on 18 February 2021 via: the notice board of the Marshal's Office, the website of the Marshal's Office, the Voivodeship's BIP and in the regional press (Dziennik Łódzki, on 18 February 2021). Comments on the draft could be submitted in writing to the address of the Marshal's Office, orally at the office of the Marshal's Office, and via e-mail. 81 comments, requests and opinions were submitted, most of which were taken into account. None of the comments concerned thermal waste treatment or the ERF.</p>

Document/decision/action	Summary of stakeholder engagement
	EPP 2021 was adopted by Resolution No. XXXIV/445/21 of Łódzkie Voivodeship Assembly/Sejmik Województwa Łódzkiego of 27 August 2021 and published in the BIP. ¹⁶
Waste Management Plan for Łódzkie Voivodeship 2011 (also covering the years 2012 - 2015) ("WMP 2011")	<p>The ERF was included in the WMP 2011 as "Construction of TWCF in Łódź implemented under the project "Municipal waste management in Łódź - Phase 2".¹⁷</p> <p>For WMP 2011, a strategic EIA was carried out, including a public consultation. Work on the WMP 2011 started in 2006. The draft was developed by the Voivodeship Board in collaboration with the Office for Spatial Planning of Łódzkie Voivodeship and the Technical University of Łódź with input from the municipal- and county-level local governments and the government administration. A Consultation Team was also established, consisting of, among others, representatives of the Voivode, the Voivodeship Inspectorate of Environmental Protection (WIOŚ) and Łódź-based universities. WMP 2011 draft was sent to the following stakeholders to acquire their opinions: the Minister of the Environment, the executive bodies of the <i>poviats</i> and <i>gminas</i> (municipal and county-level local government) in the Voivodeship, including the City of Łódź, the Voivode, the WIOŚ, Sanepid, the competent director of the Regional Water Management Board, and was also sent for public consultation. The draft was available on the website and at the office of the Marshal's Office. The comments made by stakeholders through public consultation mainly concerned the concept of the waste management system and the diagnosis of the current state. These were both general and specific comments. As a result of the public consultations and meetings of the Consultation Team, all comments were thoroughly analysed and considered in the course of the work on the final version of the WMP 2011 draft. Comments considered valid were taken into account in the final version of the document. The legislation at the time did not require a breakdown of the comments received, so it is not possible to determine whether any of the comments were directly related to the implementation of the ERF.</p> <p>WMP 2011 was adopted by Resolution No. XXIII/549/08 of the SWŁ on 31 March 2008 and was published in the BIP.¹⁸</p>
Waste management plan for Łódzkie Voivodeship for the years 2019 - 2025 also covering the years 2026 - 2031 ("WMP 2019")	<p>The ERF is included in the investment plan constituting Annex No. 1 to WMP 2019 (item 1 fig. 4.8 titled "Planned new installations for thermal conversion of municipal waste and waste remaining after processing of municipal waste"). The body developing the draft of WMP 2019 was the Board of Łódzkie Voivodeship. The draft WMP 2019 together with the accompanying investment plan was consulted before adoption, and public consultations were held for it twice. In the first draft of WMP 2019, the ERF was not included in the investment plan, so the Investor submitted a request during the first public consultation to include the ERF in the investment plan. In the second draft of WMP 2019 subjected to the 2nd public consultation, the ERF was already included in the investment plan and therefore the relevant stakeholders were able to submit their comments and remarks concerning the ERF as well.</p> <p>A strategic EIA was carried out for WMP 2019. The scope of the environmental impact assessment was agreed by the following stakeholders: the RDOŚ (03 April 2019) and Sanepid (04 April 2019). The draft WMP 2019 and the environmental impact forecast were reviewed by the following stakeholders: the RDOŚ (negative opinion, on 04 September 2020 and 27 April 2021, and positive opinion on 16 August 2021), Sanepid (positive opinion on 11 August 2020 and 12 April 2021), mayors of municipalities of Łódzkie Voivodeship, including the Mayor of the City of Łódź, and the Minister of Climate and Environment (comments to the draft issued on 20 and 31 August 2021, positive opinion and agreement of the draft investment plan including the ERF issued on 10 September 2021).</p> <p>The public consultation of the draft WMP 2019 with the environmental impact assessment was conducted twice. The first public consultation was held between 21 July and 11 August 2020. The second public consultation (also covering the draft investment plan including the ERF) was held between 29 March and 19 April 2021. Announcements on the initiation of the public consultations were published on the BIP website of Łódzkie Voivodeship (on 21 July 2020 and 29 March 2021, respectively), in the regional press (Dziennik Łódzki, 21 July 2020 and 29 March 2021, respectively) and on the notice board of the Office of the Marshal. The contents of the documents could be consulted at the Marshal's Office and on the BIP website of the Marshal's Office. Comments and requests could be submitted in writing to the address of the Office of the Marshal, orally in the form of additions to the minutes at the office of the Marshal, by e-mail without a secure electronic signature or via the e-PUAP online platform. Both the 1st and 2nd public consultations lasted at least 21 days. 234 comments, remarks and requests were submitted during the 1st public consultation and 197 were submitted during the 2nd public consultation (431 in total). All comments and requests were duly considered, of which 273 were accepted and 158 were not. Apart from the aforementioned request which the Investor submitted during the 1st public consultation to include the ERF in the investment plan (which was accepted), no other stakeholder made comments on the ERF in the consultation rounds accompanying WMP 2019.</p> <p>WMP 2019 was adopted by Resolution No. XXXVI/466/21 of the SWŁ on 28 September 2021 and was published in Łódzkie Voivodeship's BIP.¹⁹</p>
Draft Waste Management Plan for Łódzkie Voivodeship for the years 2025-2030, also covering the years 2031-2036 ("WMP 2030")	<p>The announcement of the Board of Łódzkie Voivodeship on the commencement of work on the draft WMP 2030 was published in Łódzkie Voivodeship's BIP on 2 November 2023.²⁰</p> <p>The procedure is ongoing. The dates for the WMP 2030's public consultation has not yet been announced.</p>
Municipal and Environmental Policy of the City of Łódź 2020+ ("MEPŁ 2020+")	<p>The ERF is included in the area "Municipal waste management and maintenance of cleanliness and order" in the strategic objective "Clean city – a joint effort" under the operational objective "Maximise waste treatment and recovery" as programme X, titled "Construction of a regional waste treatment facility".</p> <p>The guideline for MEPŁ 2020+ developed by the Mayor of Łódź were subject to public consultations with the inhabitants of Łódź, NGOs and other interested stakeholders. They lasted from 21 May to 31 July 2012. Taking into account opinions, remarks and recommendations gathered during the consultations, a draft MEPŁ 2020+ was developed, which was also subject to public consultations (consultation period: 9-18 October 2012). The final text of the draft MEPŁ 2020+ presented to the Łódź City Council was the result of the second round of the consultations as well as comments and opinions from experts. The available documentation does not allow us to reconstruct whether any of the comments and requests submitted concerned the ERF.</p> <p>MEPŁ 2020+ was adopted by Resolution No. LV/1151/13 of the City Council of Łódź on 16 January 2013 and published in the BIP.²¹</p>

Document/decision/action	Summary of stakeholder engagement
Draft Municipal and Environmental Policy of the City of Łódź 2030+ (“MEPŁ 2030+”)	<p>The ERF has been included in the guidelines and directions for the draft MEPŁ 2030+ in the Thematic Area “Waste Management”, in the operational objective “Maximising the treatment and recovery of municipal waste” as the operational task titled “Construction of municipal waste thermal conversion facilities”.</p> <p>The guidelines and directions for the draft MEPŁ 2030+ were subjected to the first stage of public consultations (30 August – 13 September 2021).²² An announcement on the commencement of public consultations together with the guidelines and the accompanying consultation form were published in the BIP and on the website of the Municipality of Łódź; the guidelines could also be consulted in two Łódź City office locations during working hours, and they were also sent to housing estate councils. The forms of this round of consultations included: telephone consultations in thematic areas with the possibility to submit comments, proposals and opinions (e.g. in the following areas: waste management on 1 September 2021 between 10:00 a.m. and 12:00 a.m. and clean air and renewable energy sources on 02 September 2021 between 10:00 a.m. and 12:00 a.m.), minuted public consultation meetings (e.g. on 7 September 2021 between 4:00 p.m. and 7:00 p.m. for waste management, on 08 September 2021 between 4:00 p.m. and 7:00 p.m. for clean air and renewable energy sources), collection of proposals and opinions in writing, including by e-mail, on consultation forms to the indicated e-mail address. A report on the first stage of public consultations was drawn up and published in the BIP.²³ A total of 46 people took part in stage 1 of the consultation and 111 comments and 1 request were submitted. Of the participating persons, 31 people (24 women and 7 men) completed the consultation forms and submitted 102 comments, requests and opinions. Two requests concerned the reduction of waste fees (of which one proposal also concerned the construction of a facility) and one request concerned the construction of a waste disposal facility; these were considered by the Mayor as addressed by including the ERF in the draft MEPŁ 2030+, with the following comment: “[the construction of the new facility] is expected to result, among other things, in a reduction of municipal waste management fees paid by residents”.</p> <p>In the City of Łódź’s schedule of public consultations for 2024 (published²⁴), the second stage of the public consultations of the draft MEPŁ 2030+ is scheduled for the 4th quarter of 2024.</p>
Environmental Protection Programme for the City of Łódź for 2011-2014 with an Outlook for 2015-2018 (“EPP 2011”)	<p>The ERF was included in the EPP 2011 as the task “Municipal waste management in Łódź - phase 2” with the following scope: “construction of an TWCF with a capacity of 200,000 Mg/year”.</p> <p>EPP 2011 was subject to a strategic EIA, as part of which it was reviewed by the Board of Łódzkie Voivodeship. Public consultations were held for the programme, but the available documentation does not make it possible to reconstruct whether the comments and requests submitted as part of these consultations applied to the ERF.</p> <p>As part of the work on the EPP 2011, a survey was carried out among the inhabitants of Łódź to assess the state of the environment in the city. The questionnaire contained 11 questions concerning opinions on, among other things: investments and actions necessary to be carried out in order to improve the condition of the natural environment (including the ERF). The questionnaire was posted on the website and its printed version was distributed to the City’s offices. A total of 93 surveys were received (35 printed forms and 58 online forms). According to the respondents, the problem of waste should be solved with thermal waste treatment (48% in favour, only 11% against thermal waste treatment). According to 71% of those taking part in the survey, a modern waste incineration plant would be a good solution to the City’s waste challenge. The results of the survey were taken into account when defining the measures to improve the condition of the natural environment in the City.</p> <p>EPP 2011 was adopted by Resolution No. XI/139/11 of the City Council of Łódź on 30 March 2011 and published in the BIP.²⁵</p>
Waste Management Plan for the City of Łódź 2009-2011 with an outlook for 2012-2020 (“WMP 2009”)	<p>The ERF was included in WMP 2009 as an element of the proposed waste management system called “Thermal Waste Neutralisation Installation”, with planned capacity at 260,000 Mg/year in the scenario when the installation serves the City of Łódź only, as well as two tasks: “Supporting the implementation of economically and environmentally effective waste recovery and neutralisation technologies, including technologies allowing the recovery of energy contained in waste through thermal and biochemical waste conversion processes” and “Municipal waste management in Łódź - phase 2 (construction of a thermal waste conversion facility)”.</p> <p>The draft WMP 2009 was most probably adopted with stakeholder input, but the available documentation does not allow us to reconstruct the proceedings and provide more data.</p>
Environmental Protection Programme for the City of Łódź for 2018-2021 with an Outlook to 2025 (“EPP 2018”)	<p>Due to the non-receipt of EU funding by the City of Łódź, the task of building the TWCF has been identified in EPP 2018 as “not realised”.</p> <p>EPP 2018 was agreed and positively reviewed by one of the stakeholders, the Board of Łódzkie Voivodeship. The available documentation does not make it possible to establish whether the document was subject to public consultation and agreement or whether opinions from other stakeholders were submitted.</p> <p>EPP 2018 was adopted by Resolution No. LXXVIII/2101/18 of the City Council of Łódź on 31 October 2018 and published in the BIP.²⁶</p>
Environmental Protection Programme for the City of Łódź for 2024-2027 with an Outlook to 2031 (“EPP 2024”)	<p>EPP 2024 on waste management refers to the compatibility with the WMP 2019 and its investment plan, in which the ERF is included.</p> <p>The draft EPP 2024 was agreed and given a positive opinion by the Board of Łódzkie Voivodeship. The draft document, together with the environmental impact forecast, was subjected to a strategic EIA and public consultations (from 10 to 30 October 2023). An announcement about the consultations was published in the BIP (on 9 October 2023).²⁷ The draft EPP 2024 was available in the BIP and at the City of Łódź office. Comments and proposals could be submitted by e-mail, by post and in person at the office. The draft EPP 2024 and the environmental impact forecast were supplemented by the findings from the consultations and opinions. The available documentation does not make it possible to establish the exact course of the public consultation and whether any of the comments concerned thermal waste conversion or the ERF.</p> <p>EPP 2024 was adopted by Resolution No. LXXXVI/2598/24 of the Łódź City Council on 17 January 2024 and published in the BIP.²⁸</p>
Łódź City Spatial Development Framework 2010. (“SDF 2010”)	<p>In SDF 2010, the ERF was included with reference to WMP 2009 as a specific waste management task: “Construction of a Municipal Waste Thermal Conversion Facility in the preferred location on the premises of the Group Sewage Treatment Plant or at the CHP4 CHP Plant”²⁹. For the ERF location, SDF 2010 established the functions of technical infrastructure marked with the symbol “IK” including, as per the relevant definition, “areas for facilities and equipment on separated plots of land related to (...) heat supply (...), accommodating elements of electric power infrastructure, (...) as well as areas for waste management facilities.”³⁰</p>

Document/decision/action	Summary of stakeholder engagement
	<p>The commencement of the SDF 2010 drafting process was initiated by a resolution of the City Council published in the BIP.³¹ The stakeholder preparing SDF 2010 draft was the Mayor of Łódź. The announcement of the possibility of submitting remarks and requests concerning the draft by the stakeholders was published in the local press (Dziennik Łódzki, Gazeta Wyborcza Łódź, 08 February 2007), on 8 notice boards in the City of Łódź offices (on 2 February 2007) and published in the Public Information Bulletin (BIP). The period for submitting requests was 15 days. There were 1944 requests from various stakeholders. The Mayor approved 348 requests, partially approved 703 requests and did not approve 893 requests; a detailed description of the mode of considering the requests was published in the BIP³². None of the requests concerned the ERF or thermal waste treatment. The draft SDF 2010 was subject to a strategic EIA. The scope of the strategic EIA was agreed by the stakeholders: the RDOŚ (on 05 January 2009) and Sanepid (on 06 January 2009). The announcement of the commencement of the strategic EIA was published in the local press (Dziennik Łódzki, Gazeta Wyborcza Łódź, 14 July 2009), posted on 6 notice boards at the City of Łódź offices, published in BIP and on 2 websites of the City of Łódź. 146 requests were submitted: 6 were approved, 64 were partially approved, 75 were not approved - a detailed description of the mode of considering the requests was published in BIP (on 15 September 2009).³³ None of the applications concerned the ERF, and one application from the Chojny Housing Estate Council concerned a change in one of the options for the location of another planned waste incineration plant at Demokratyczna Street (approx. 11 km from the ERF site), and was deemed not relevant to the content of SDF 2010 at that stage. The draft SDF 2010 was positively assessed by the following stakeholders: the RDOŚ (on 9 October 2009) and Sanepid (on 16 October 2009). The announcement of the public scrutiny of the draft SDF 2010 with the environmental impact forecast was published in the local press (Dziennik Łódzki, Gazeta Wyborcza Łódź, 1 December 2009), in the Public Information Bulletin (30 November 2009), on 2 websites of the City of Łódź and was displayed on 6 notice boards at Łódź City offices. The consultations lasted from 16 December 2009 to 01 February 2010. The stakeholders were able to access the draft in two offices of the City of Łódź. 147 people took part in the public consultation (as of 21 December 2009). During the public consultation, 699 comments and requests were submitted: the Mayor took into account and approved 78, partially approved 227 and did not approve 394. The City Council considered the comments not approved by the Mayor and approved 23 of them. None of the comments related to the ERF or thermal waste treatment.</p> <p>SDF 2010 was adopted by Resolution No. XCIX/1826/10 of the Łódź City Council on 27 October 2010 and published in the BIP.³⁴</p>
<p>Łódź City Spatial Development Framework 2018 ("SDF 2018")</p>	<p>SDF 2018³⁵ is a document defining the spatial policy of the City of Łódź. The document refers to the ERF in the part titled "Conditions" as a potential source of energy: "the planned incineration plant for municipal waste, 200000 t/a, i.e. ca 72.0 MW, possible location indicated, Feasibility Study available, suggested location: the EC-4 area".³⁶ SDF 2018 mentions the City's abandonment of the TWCF construction project, but in doing so the document refers to the content of the Voivodeship's waste management plans, which include the ERF. The ERF site, according to SDF 2019, is located in an area designated for development in a unit marked with the AG2 symbol: areas of economic activity with considerable adverse effects on the neighbourhood, playing an important role for the economic development of Łódź. The aim of the City's spatial policy in this field is to concentrate areas where business activity with potentially adverse effects on the neighbourhood is to be conducted, as well as shaping correct relationships of such businesses with their neighbourhoods. The area's designation includes industrial developments (including energy recovery facilities).</p> <p>The commencement of drafting of SDF 2018 was initiated by a resolution of the City Council (RMŁ) published in the BIP.³⁷ The stakeholder preparing the draft SDF 2018 was the Mayor of the City of Łódź. The announcement about the possibility of submitting applications to the draft by the stakeholders was published in the local press (Dziennik Łódzki, Gazeta Wyborcza Łódź 16 August 2013), posted on 4 notice boards at City of Łódź offices and on the website of the City of Łódź. The period for submitting requests was 15 days. There were 1,305 requests from various stakeholders. The Mayor considered all the requests and the decision was published in the BIP (19 December 2016). None of the requests concerned the ERF or thermal waste conversion. The draft SDF 2018 was subjected to a strategic EIA. The scope of the environmental impact assessment was agreed by the following stakeholders: the RDOŚ and Sanepid, who also provided their opinions on the draft. The draft with the environmental impact forecast was displayed for public scrutiny (17 July 2017 - 15 September 2017). The relevant announcement was published in the local press (Gazeta Wyborcza Łódź, 7 July 2017), on 4 City office notice boards and on the City's website. The announcement included information about the possibility to submit comments and requests (until 9 October 2017) and about the public discussion on the solutions adopted in the draft document. 3,286 comments were submitted, which were then considered by the Mayor and published in the BIP (on 16 February 2018). None of the comments related to the ERF or thermal waste conversion.</p> <p>SDF 2018 was adopted (after the City Council reconsidered the comments not approved by the Mayor) by Resolution No. LXIX/1753/18 of the City Council of Łódź of 28 March 2018, published in the BIP³⁸, and the notice of adoption of the resolution was also published in the BIP³⁹.</p> <p>SDF 2018 was amended twice (in 2019 and 2021), each time with a strategic EIA and following public consultation. The amendments did not concern the ERF. During these consultations no comments or requests concerned the ERF or thermal waste treatment. As of 2022, the procedure for the third amendment of the SDF 2018 is open, which is in the early stages of collecting stakeholder comments/remarks/requests, but due to a change in the spatial planning law it is unlikely to be continued,⁴⁰ as a general spatial framework plan for the city of Łódź will be drawn up instead of SDF 2018 (see below).</p>
<p>General Plan for the City of Łódź ("GP 2024")</p>	<p>The procedure for the adoption of GP 2024 initiated by a resolution of the City Council (21 February 2024) is ongoing.⁴¹</p> <p>The announcement of the collection of requests/comments/remarks for the draft GP 2024 (18 March -26 April 2024) was published in the BIP (on 12 March 2024).⁴² The submitted request has not yet been processed.</p>
<p>Guidelines and Directions for the Heat, Electricity and Gas Supply in the City of Łódź ("GHEGS")</p>	<p>The first version of GHEGS dates back to 1999.⁴³ Already in this first document, the use of municipal waste for energy generation purposes through the construction of a ERF was considered as a non-conventional energy source, "if it is possible to locate it in a place where it would be reasonable and possible to ensure cooperation with the district heating network". The draft of the first version of GHEGS was open to public scrutiny for 21 days with the opportunity to submit comments, requests and objections prior to its adoption. The submitted comments and requests were then considered by the City Council. The available documentation does not allow us to establish the details of the consultation process or whether the comments, requests and objections were relevant to the ERF.</p>

Document/decision/action	Summary of stakeholder engagement
	<p>The GHEGS document been updated three times. In 2013⁴⁴, the draft update was positively reviewed by an independent expert reviewer from the Technical University of Łódź and by the Board of Łódzkie Voivodeship, and was made available for public scrutiny for 21 days in the BIP. No requests, objections or comments were made over that period. The available documentation does not allow us to reconstruct the contents of the 2013 GHEGS. In 2017⁴⁵ the draft update of the GHEGS was opened for public inspection for 21 days via the BIP, and over that period no comments were submitted. Due to the abandonment of the TWCF construction project by the First Investor (the City of Łódź), the document did not include the ERF. On the other hand, in the GHEGS update from 2021⁴⁶ the ERF is already included directly through the following content items:</p> <ul style="list-style-type: none"> • a reference in several fragments of the document to the Investor's investment programme for the commissioning of the ERF (50 MWt, 24MWe) at CHP4 CHP Plant⁴⁷ • a reference to the inclusion of the ERF in the WMP 2019 investment plan,⁴⁸ • the identification of energy recovery from waste as an action in the waste management hierarchy of activities.⁴⁹ <p>The draft 2021 GHEGS update was open to public scrutiny for 21 days (15 October – 5 November 2021) on the BIP. No requests, objections or comments were received. Waiver of the strategic EIA for the draft was agreed with the RDOŚ (10 November 2021) and Sanepid (22 November 2021). The draft GHEGS update received a positive opinion from the Board of Łódzkie Voivodeship (26 November 2021).</p> <p>Currently, the Mayor of the City of Łódź has issued a tender for the service of updating the GHEGS again (14 February 2024)⁵⁰ and has selected a contractor (on 14 March 2024)⁵¹ with a deadline of 8 months for the delivery of the updated document. The procedure is ongoing.</p>
A4.1.2 Consultation, opinion, agreement, participation in administrative decisions concerning the ERF.	
<p>ERF's 2010 environmental (and social) impact assessment ("ESIA") and decision on environmental conditions of ERF ("environmental decision")</p>	<p>For the Environmental Decision, the ESIA was conducted. The stakeholder competent to issue the Environmental Decision and to conduct public consultations was the Mayor of Łódź (please note the City of Łódź was at that time the Investor of the ERF project). The stakeholders involved in issuing the Environmental Decision who gave their opinion and agreed the conditions were: the RDOŚ (25 June 2010) and Sanepid (7 June 2010). The First Investor prepared a report on the impact of the ERF on the environment ("ESIA Report").</p> <p>Public consultations were conducted from 29 April to 31 May 2010. 2 announcements about these public consultations were published (on 22 April and 13 May 2010) with information on who is conducting the consultations, where and when, information about the possibility to access the documentation, including the ESIA Report, and to submit comments and requests. The announcements were displayed at the ERF site and in the immediate vicinity, in the local press (Gazeta Wyborcza Łódź, 27 April and 18 May 2010), on the notice boards of the municipal offices and at the local Łódź-Widzew Municipal Office, on the website of the City and in the BIP, as well as hand-delivered to councils of housing estates of the City of Łódź. Written comments, requests and proposals were submitted by one civil society organization and 73 residents. Two open meetings with residents were held (on 22 May and 22 June 2010) as well as a meeting with representatives of housing estate councils (on 18 May 2010). The comments and questions submitted in writing and during the meetings concerned mainly the following issues: location and distance of the ERF from the residential buildings (more than 600 m), concentration of 3 objects affecting residents of the Chrobry estate (the ERF, CHP4 and crematorium at Zakładowa Street), the construction of new chimneys, risks from emissions of furans, dioxins and carcinogens, cumulative impact on air quality from the ERF and CHP4, efficiency of the ERF compared to the efficiency of the municipal waste sorting plant in Lublinek, environmental and economic justification of the Project, discrepancies and ambiguities in the ESIA report, the methodology for calculating the calorific value of waste in Łódź, exceeded nickel content levels in municipal waste in Łódź, loss of the environmental value of the Widzew district, distance from the airport in relation to the height of the chimney, frequency of measurement of emissions from the chimney (once every 6 months) the share of electricity and heat produced by the ERF in the total electricity and heat used in Łódź, the possibility of emission of foul odours due to temporary storage of waste before thermal treatment, and the possibility of a serious accident threatening human health and life. The protest was also lodged without any comments. A protest was also lodged, without any supporting comments or justification provided. All comments and requests were duly considered and addressed, and the authors of the ESIA Report were asked to provide clarifications to individual stakeholder comments. For most of the comments and requests, the explanations provided by the authors of the ESIA Report were accepted as sufficient and some comments were approved, after which the ESIA Report was amended (addendum of 14 June 2010). In addition, the Mayor provided clarifications for all groups of stakeholders who had submitted comments or requests.</p> <p>In addition, the stakeholders within the ERF's footprint who were entitled to the status of a "party" were additionally notified of the initiation of the proceedings and the possibility to submit comments, requests and proposals. This procedure was used by one stakeholder who submitted a comment about an error in the ESIA Report. The comment was taken into account and the content of the ESIA report was amended. One NGO based in Opole filed a request (on 24 June 2010) to be recognised as a party, however, it did not respond to the request to rectify some formal issues in the request (sent out on 28 June 2010).</p> <p>The Environmental Decision was issued by the Mayor of the City of Łódź (28 June 2010),⁵² and the information about the Decision's issuance was published in the BIP.⁵³ The Environmental Decision was appealed (Who? When?) to the Local Government Appeal Board ("SKO"), which rejected the appeal (on 8 November 2014).</p> <p>The Environmental Decision was "extended" twice (25 August 2014⁵⁴ and 20 June 2016⁵⁵) by the Mayor of the City of Łódź. One stakeholder, Fundacja Instytut Spraw Obywatelskich (the Institute for Civil Affairs Foundation, ISO) based in Łódź filed a motion with the SKO to annul the second extension of the Decision. A motion for the annulment of the second "extension" was also submitted to the SKO by another stakeholder, Towarzystwo na rzecz Ziemi (Society for the Earth, TNZ) based in Oświęcim, but the SKO rejected that motion (on 7 April 2022) in a decision which was appealed by TNZ to the Voivodeship Administrative Court (WSA) on 4 May 2022. The WSA returned the case for re-consideration by the SKO (on 22 September 2022), and this in turn was appealed to the Supreme Administrative Court (NSA) by the Investor and the case is still pending at the NSA.</p>
<p>ERF zoning decision ("ZD")</p>	<p>The proceedings regarding the ZD for ZOE were conducted based on an application submitted by VNEL (on 28 February 2020, with amendments on 14 and 30 April 2020). The parties involved in the proceedings were notified by the conducting authority (the Mayor of the City of Łódź) about the possibility of their participation in it (on 7 May 2020). Due to the specific nature of the zoning decision proceedings, Veolia Łódź was recognized as the only party, being the owner of plots surrounding the ZOE area. During the proceedings, a state of epidemic (COVID-19) was in effect in Poland, but this did not impact the proceedings. The stakeholder, the Mayor of the City of Łódź,</p>

Document/decision/action	Summary of stakeholder engagement
	<p>also requested that VNEL provide a document confirming that the detailed elements specified in the zoning application did not require changes to the environmental decision. For this purpose, VNEL obtained a document from the Environmental Protection and Agriculture Department of the Łódź City Office, stating that no changes to the environmental decision were required (on 29 June 2020).</p> <p>The application also included opinions from stakeholders, network operators regarding the supply of utilities from the water and sewage systems, and an agreement with the stakeholder Veolia Łódź concerning transportation services, land development, and the availability of the plot for construction purposes. The zoning decision project was coordinated with the stakeholder, the Civil Aviation Authority, which issued a silent approval (on 8 June 2020). The Mayor of the City of Łódź issued the ZD (on 2 July 2020).⁵⁶</p>
<p>ERF's environmental (and social) impacts re-assessment in 2020-2021 ("EIRA")</p>	<p>The need to carry out a EIRA prior to the issuance of the building permit ("BP") resulted from the terms of the 2010 Environmental Decision and was conducted in connection with the Investor's application for a BP (15 September 2020). The stakeholder conducting the EIRA was the Mayor of the City of Łódź and the stakeholder involved in agreeing the conditions was the RDOŚ, Sanepid and PGW Wody Polskie (Polish Waters). The Investor prepared a second report on the impact of the ERF on the environment ("EIRA report").</p> <p>The Mayor determined the circle of stakeholders of the EIRA on the basis of the analysis of the EIRA report and the zoning decision (ZD). The owners and managers of the properties located in the immediate vicinity (i.e., Veolia Łódź and the city of Łódź) were considered as stakeholders with a legal interest in the ERF. Information on the initiation of the EIRA was disclosed by posting notices on the notice boards at the City's offices, at the gatehouse of the CHP4 Combined Heat and Power Plant (at ul. Jadzi Andrzejewskiej 5) and on the fence of the ERF site, and the announcement was also published in the BIP (28 September – 28 October 2020). The Mayor requested the RDOŚ to agree the environmental conditions for the implementation of the ERF (25 September 2020). The RDOŚ requested clarifications and supplements to the EIRA Report (27 November 2020), and the Mayor of Łódź forwarded the request to the Investor (8 December 2020) with a deadline of 30 days for response, which was extended twice with the Mayor's consent (until 16 April 2021). The Investor sent the required clarifications and an addendum to the EIRA Report (26 March 2021) to the Mayor, and the Mayor forwarded the clarifications and the addendum to the RDOŚ.</p> <p>Another stakeholder, Polska Partia Socjalistyczna (Polish Socialist Party) submitted its comments and requests (on 29 October 2020 and 19 November 2020), including a request for access to public information in the form of the EIRA report and challenging the handling of the case during the pandemic. The Mayor of the City of Łódź looked into the submitted requests and comments (on 15 December 2020).</p> <p>NGO stakeholders: Towarzystwo na Rzecz Ziemi based in Oświęcim ("TNZ") (on 13 May 2021) and Centrum Zrównoważonego Rozwoju (the Centre for Sustainable Development) based in Łódź (on 28 July 2021) applied for a status of a party to the proceedings and were granted the status by the Mayor of Łódź. TNZ applied for access to the two "extensions" of the Environmental Decision and for the Investor to be obliged to complete the EIRA Report regarding the phasing of the ERF's implementation. The Mayor of the City of Łódź made available to TNZ the documentation of the case (in writing and at the office of the City of Łódź). TNZ also submitted other requests for supplementing the EIRA Report and providing information on public consultations, to which request TNZ received replies from the Investor and the Mayor of Łódź. In addition, dozens of single-subject motions were filed (as of 01 August 2021) by individual stakeholders requesting to be recognised as parties to the proceedings and requesting resumption of the proceedings on the ESIA and the zoning decisions. These requests were rejected.</p> <p>The RDOŚ requested the Mayor of Łódź (on 9 April 2021) to ensure public consultations as part of the EIRA and to publicly announce them. The Mayor of the City of Łódź issued announcements on the possibility to review the documents at the RDOŚ office over the period of 30 days (12 April 2021) and on the commencement of the relevant public consultations (19 April 2021), with the latter carried out between 21 April 2021 and 21 May 2021. These two announcements were disclosed on separate dates in the same way: by posting on the notice board of the City of Łódź office, in the gatehouse/reception area of the CHP4 Combined Heat and Power Plant (ul. Jadzi Andrzejewskiej 5), on the fence of the ERF site and via publication in the BIP of the City of Łódź and the BIP of the RDOŚ (21 April 2021-21 May 2021), in the local press (online edition of Dziennik Łódzki, 21 April 2021). Additional information-sharing activities on public consultations were also undertaken by the Investor (as described in Table A4.2). The Mayor of the City of Łódź submitted a report on the public consultations to the RDOŚ (18 August 2021), which included information that no stakeholders submitted comments or proposals and that no administrative hearing was held as part of the consultations (due to the Covid-19 pandemic). The RDOŚ agreed new conditions for the implementation of the ERF (27 August 2021).⁵⁷ In these conditions, the RDOŚ imposed, inter alia, the obligation to perform a post-implementation analysis (including air quality analysis, acoustic analysis, waste management analysis) one year after the commencement of the ERF's operation and to submit it to the stakeholders (the RDOŚ and the Mayor of the City of Łódź) within 6 months of its execution, as well as making available on an ongoing basis the results of continuous exhaust gas monitoring based on one of the reference methods combined with the ERF automated measurements to the following stakeholders: Marshal of the Voivodship and the WIOŚ, as well as allowing them to have continuous access to the current and archived data, and furthermore the obligation to publish the aforementioned data on air emissions from the ERF in digital form on-line, on the information board placed on the ERF gatehouse building (on the northern wall of the building), on an ongoing basis.</p> <p>Along with the publication of the building permission in the BIP (below), the EIRA Report was also published (22 November – 05 December 2021).</p>
<p>building permit decision ("BP")</p>	<p>The BP proceedings were conducted by the Mayor of Łódź following the EIRA following the Investor's application (15 September 2021). The stakeholders recognised as parties in the proceedings were TNZ and CZR. The stakeholder Stowarzyszenie Wschodząca Energia from Łódź also applied for recognition as a party (on 30 September 2021), but was not recognised as such as it had existed for less than 12 months. TNZ requested that the BP proceedings be suspended until the SKO resolved the validity of the second "extension" of the Environmental Decision. The request was rejected. New arrangements were made by Sanepid (15 September 2021), which was challenged by TNZ in relation to the EIRA and other alleged formal errors (20 October 2021) and TNZ's request for correction of the EIRA report. TNZ's request was rejected citing, inter alia, the public consultation conducted as part of the EIRA. CZR stakeholder requested access to the case's documents (3 and 9 November 2021), which CZR received (on 15 November 2021).</p>

Document/decision/action	Summary of stakeholder engagement
	<p>The BP was issued (15 November 2021) and the relevant notice of issuance was published in the BIP along with the contents of the BP (19 November 2021)⁵⁸ and the EIRA Report (22 November – 5 December 2021). The investor also published information about the issued BP on its website (22 November 2021).⁵⁹</p> <p>TNZ and CZR stakeholders filed appeals against the BP to the Łódzkie Voivode, who rejected the appeal and upheld the BP (11 February 2022). Following the decision of the Voivode, the stakeholders filed a complaint to the WSA (18 March 2023), which rejected it (on 17 January 2023), and which TNZ appealed to the NSA, where the case was dismissed by a final and binding ruling (on 25 June 2024).</p>
decision to amend the PnB (“ABP”)	<p>The Investor applied for issuance of the decision to amend the BP (ABP, on 22 September 2023). The competent authority (Mayor of the City of Łódź) notified (on 9 October 2023) the stakeholders about the ABP proceedings and the possibility of becoming accessing the relevant files and submitting comments, and disclosed (on 9 October 2023) information about the proceedings by posting relevant notices at the office of the City of Łódź, at the gatehouse of the CHP4 Combined Heat and Power Plant (ul. Jadzi Andrzejewskiej 5) and by publishing the information in the BIP and on the “Ekoportal” managed by the General Director of Environmental Protection⁶⁰ (10 October 2023 – 24 October 2023). The information on the collection of requests and comments (published between 10 November 2023 and 16 November 2023) was disclosed in the same way. No stakeholder came forward as a party or requested recognition as a party and no comments or requests were submitted.</p> <p>The ABP was subsequently issued (27 November 2023)⁶¹, and information about the issuance of the ABP was published in the BIP.⁶²</p> <p>Following that, no stakeholder exercised their right to appeal to an administrative court, and the ABP became final (27 December 2023).</p>
Other administrative decisions issued by stakeholders	<p>Other administrative decisions for the ERF were also issued by one of the stakeholders, the Mayor of Łódź:</p> <ul style="list-style-type: none"> Decision No. DPRG-UA-IX.158.2023 of 10/02/2023 issued by the President of the City of Łódź establishing the development conditions for external water supply installations, external sanitary sewage installations, external storm water installations, Decision No. DPRG-UAXIII.761.2023 of 05/05/2023 issued by the President of the City of Łódź on a building permit for external water supply installations, sanitary sewage installations, external storm water installations, ZDIT-UU.40120.5.297.2020 and ZDIT-UU.40120.5.392.2020 - decisions on permits for the location of facilities in the road zone, Decision No. ZZ/610/22 of 25/10/2022 issued by the President of the City of Łódź (letter reference: DEK-OŚR-II.6131.661.2022.NM) permitting Veolia Energia Łódź S.A. to remove 2 trees (Italian Poplar), amended by decision ZZ/558/23 of 08.11.2023, extending the value of the decision to 29.02.2024, amended by decision ZZ/116/24 of 04.03.2024, extending the validity of the decision to 31.03.2024, Decision No. ZZ/324/22 of 03.06.2022 issued by the President of the City of Łódź (letter reference: DEK-OŚR-II.6131.338.2022.NM) permitting Veolia Nowa Energia Sp. z o.o. to remove 48 trees, amended by decision No. ZZ/672/22 of 24.11.2022 extending the validity of the decision until 31.12.2023, amended by decision No. ZZ/559/23 of 08.11.2023 extending the validity of the decision until 29.02.2024. Decision No. DPRG-UA-XIII.697.2024 of 12.04.2024 issued by the President of the City of Łódź (letter reference: DPRG-UA-XIII.6740.307.2023) granting Veolia Nowa Energia Sp. z o.o. building permits for the expansion of the existing 110 kV switchboard, which is part of the power grid, by an additional 110 kV bay no. 17, together with equipment and accompanying infrastructure (plot no. 127/1, district W-32), Decision No. DPRG-UA-XIII.1631.2024 of 20.08.2024 issued by the President of the City of Łódź (letter reference: DPRG-UA-XIII.6740.164.2024) granting Veolia Nowa Energia Sp. z o.o. permits for the construction of underground cables and devices for transmitting electricity with a voltage of 110 kV together with fibre optic canalisation between ITPO and the existing 110 kV power switchboard (plot No. 56/222, 56/228, 56/224, 56/29, 127/1, district W-32).' <p>Information on some of these decisions has been published in the BIP.⁶³ At the time they were obtained, no stakeholder stepped forward as a party nor submitted any comments or requests. Also, no stakeholder exercised their right to appeal these decisions to an administrative court remedies and, consequently, these decisions became final and binding.</p>

Table A4.2, on the other hand, shows the additional (informal and not legally required) activities of investors to date aimed at engaging the stakeholders through information campaigns, educational initiatives, soliciting feedback through surveys, etc.

Table A4.2 Summary of additional stakeholder engagement activities to date.

Additional activity	Summary of stakeholder engagement
City of Łódź information and consultation campaign on TWCF (ERF) in 2008-2009	<p>The First Investor (the City of Łódź) was communicating with stakeholders since the earliest preparatory stage of the ERF. Already at the Project’s beginning, two consultation meetings were held with the inhabitants and social and environmental organisations (10 June 2008 and 14 December 2009), during which the City presented the degree of advancement of the work on the project “Municipal waste management - phase 2” including TWCF (ERF). An information desk was launched, located in the Łódź City Hall building and open on Mondays and Thursdays (10 a.m. to 1 p.m.). Furthermore, a special phone information line with a dedicated number and a website devoted to the topic at www.czystemiasto.uml.Łódź.pl were launched. The website featured information on the Project, current and planned activities, as well as the results of the 2009 opinion poll (see below). As a consequence of these activities, publications about the Project also appeared in the local press.</p>
Survey of Łódź residents in 2009.	<p>The survey on the environmental awareness and attitudes of the inhabitants of Łódź towards waste segregation and the planned investment, TWCF (ERF), was conducted by the TNS-OBOP polling company on behalf of the City of Łódź (9-21 December 2009). The sample was selected by quota and random sampling, consisted of 800 residents aged 20-50, and was representative of the City's population in terms of gender, age and place of residence. Methodology: computer-assisted telephone interview (CATI).</p> <p>88% of the respondents felt that TWCF was needed by the City. As many as 81% of the respondents considered this technology to be less harmful than landfilling. Supporters of TWCF stressed that landfill was a more dangerous method of waste management. There was equally strong support (90%) for both obtaining heat and electricity from waste. The location of the ERF on the site of the CHP4 Combined Heat and Power Plant was the second in the order of preference (24%), just after the site of the GOŚ wastewater treatment plant (29%) and well ahead of the site of the</p>

	<p>Ustronna Power Plant (8%), while the majority (40%) had no preference for the location. Residents of the Widzew district preferred the CHP4 site as much as the GOŚ site. According to 68% of those surveyed, the decision to build a ERF should be made by experts, according to 47% it should also involve all residents, while 77% were of the opinion that such investments must be made even if not everyone agrees with them. Those expressing a negative stance on thermal technology (7%) were concerned about the smoke, the possibility of toxic emissions including dioxins, toxic gases, smoke and odours, the impact on the climate and the impossibility of further treatment of waste following incineration.⁶⁴</p>
<p>Information campaign on the development of the municipal waste management system through TWCF (ERF) in Łódź in 2010-2011</p>	<p>The First Investor in the tender selected a contractor who carried out (starting date: 20 April 2010) a 10-month information campaign addressed to the City's inhabitants concerning the development of the municipal waste management system in Łódź, the central element of which was to be the implementation of TWCF (ERF). The campaign included: a visual identification of the Project under the slogan "TWCF. Clean Energy"; the involvement of the Project's ambassador (Prof. G. Wielgosiński, waste management specialist); setting up a consultation point (at the City of Łódź on Tuesdays from 11.00 a.m. to 5.00 p.m.); a study trip to the thermal waste conversion plant in Vienna with the Project ambassador (09-11 September 2010, for representatives of the residents of Widzew district, environmental organisations, journalists from the local press); 3 discussion panels concerning TWCF (ERF) (16 December 2010 and 25 January 2011 in the City of Łódź office, 8 February 2011 at a school in Widzew district; attended by the Project's ambassador, professors from technical universities, specialists from other waste treatment plants in Poland, and featuring a discussion on the ESIA report); Project website (www.energiazodpadow.pl) featuring the publication of the ESIA report and other ERF documents starting from 2010, information about TWCF (ERF) and the related consultation and information activities, as well as articles by the Project ambassador; TWCF (ERF) press office for journalists; 9 press conferences about TWCF (ERF) (15 February 2011: a press conference summarising the information campaign); Citylight posters on public transport stops (2 x 20); leaflets (50,000 copies) and a brochure (10,000 copies) with information on TWCF (ERF) distributed to residents during campaign events; promotional gadgets (biodegradable pens, eco-friendly crayons, crayon cases, colouring books, folders) distributed during events; information and consultation events, including in the Widzew district (an exhibition on waste processing in the largest shopping mall in Poland); and a conference on the implementation of the campaign. Further activities included information and consultation events, including in the Widzew district (waste processing exhibition in the city's largest shopping centre, 20 September - 24 October 2010; information leaflets distributed by people dressed in in the city's three largest shopping centres 22-24.10.2010; promotional and consultation event in the largest shopping centre in the city with information on TWCF (ERF), a lecture by the Project ambassador and workshops; art competition for primary school pupils on the subject of "TWCF - energy from waste"); 2 versions of an advertising spot on TWCF (ERF) featuring the Project ambassador (30 seconds, 20 broadcasts in August 2010 on the local TV channel, TVP Łódź); educational materials for teachers (distributed across 200 schools), printed report brochure on the campaign. Outcomes: participation of large numbers of residents in events, more than 100 participants in the panel discussion in Widzew district, 140,000 website hits, 5 articles by Project ambassador published, 15 press enquiries, 40 press articles, 11 TV information broadcasts, 10 presentations of TWCF (ERF) to stakeholder groups.</p>
<p>Investor's information activities 2019-2020</p>	<p>After taking over the Project, the new Investor (Veolia) conducted communication and stakeholder relations in 3 phases:</p> <ul style="list-style-type: none"> • preliminary phase: expert communication (November 2019 - January 2020), • information campaign (February - March 2020): information about the investment decision at a press conference (30 January 2020) and at an on-site visit to the CHP4 CHP plant (07.02.2020) and distribution of a press release - which resulted in many press publications⁶⁵ • an information, social and educational campaign on the transformation of the CHP sector and decarbonisation in Łódź, of which the ERF is an element: (the campaign's aim: to reach a wide audience through the media, institutions, local government, civil society organisations and through direct contacts with residents) meetings and presentations of the ERF to formal and informal groups, e.g. during the Forum of Housing Cooperative Managers, for associations and other non-governmental organisations, by organising regular meetings and presentations of the Project at the City of Łódź offices; creation of the trademark "Nowa Energia dla Łodzi", launch of the ERF website⁶⁶, including a Facebook page,⁶⁷ as part of the projects dedicated to the decarbonisation of Veolia Łódź, dissemination of information through a printed information leaflet; <p>in March 2020 there was a change in the mode of delivery of the campaign caused by the Covid-19 pandemic - due to the necessity of cancelling face-to-face meetings and events, they were replaced with an intensive campaign in the press, radio, television and the Internet; subject-matter consultations were organised in the form of remote videoconferences with NGOs and selected residents in order to facilitate a preliminary diagnosis of the possible causes of social conflicts and prepare actions to mitigate them.</p> <p>Within the framework of these contacts, the following possible conflict issues were diagnosed: transport (traffic analysis), odour and disorder associated with using waste (use of pre-RDF fuel only), origin of waste (economic justification of the proximity principle and the relevant legal restrictions).</p>
<p>2020 Opinion poll</p>	<p>The Investor commissioned the opinion and research company Market Side to carry out a survey of the residents of Łódź, especially of Widzew district, including the topic of energy recovery from waste. The research was carried out in December 2020 as qualitative (10 in-depth telephone interviews with the residents of 4 housing estates of Widzew district, duration: 40 minutes on average; 5 interviews with men, 5 with women, 4 age groups and 4 housing estates) and quantitative (online and telephone interviews with the residents of 4 housing estates of Widzew district and other districts of Łódź, n=404, including 204 interviews with the residents of 4 housing estates of Widzew district, 200 interviews with the residents of other districts of Łódź, respondent age span 18-80 years old, distributed according to gender and age).</p> <p>More than half of the respondents had heard of plans to replace coal at the CHP plant with other fuels to reduce CO₂ emissions. In their opinion, coal should be replaced by photovoltaic technology (51%) and/or waste (47%), and other sources including biomass (34%), sewage (28%), gas (23%) were mentioned by much smaller groups respondents.</p>
<p>Additional stakeholder engagement activities implemented by the Investor in connection with the EIRA in 2021.</p>	<p>In relation to the EIRA performed during the procedure for obtaining BP (Table A4.1), the Investor disclosed the EIRA Report and its addendum for the RDOŚ from 2021 on the ERF website.⁶⁸ The Investor also published on the ERF website a notice about posting the documentation for the EIRA and the possibility to access it (on 12 April 2021),⁶⁹ and also about the public consultation⁷⁰ of which the Investor informed the inhabitants of Łódź in a letter⁷¹ (21 April 2021). The Investor also asked the 4 housing cooperatives with buildings closest to the ERF site (including the Chrobry Estate) for permission to display information posters about the Investor's decarbonisation investments (including the ERF) at the premises of the estates, and the permission was granted. In addition, at that time, the Investor also published an information brochure on the ERF website regarding Veolia Łódź's energy transformation,</p>

	including the construction of the ERF. ⁷² Moreover, the Investor added a “Frequently Asked Questions” (FAQ) section on the same website regarding the ERF and provided the answers. ⁷³ The same information was also disclosed on a page on the Investor’s Facebook.com page. At the gatehouse of the CHP4 Combined Heat and Power Plant, the Investor launched an information desk for residents and installed a box for questions and requests from stakeholders. During the period in question, the Investor also posted a number of sponsored articles in the local press on the topic of thermal waste conversion and inspired the creation of such materials (e.g. an interview with Prof. G Wielgoński and the CEO of Veolia Łódź). ⁷⁴
Stakeholder engagement activities in 2021-2024	<p>Each year, Veolia Łódź updated its strategy and communication plan, an important element of which was stakeholder engagement regarding the ERF. As part of the implementation of these plans, the following activities (among others) were carried out between 2021 and 2024:</p> <ul style="list-style-type: none"> regular (quarterly) meetings with the Mayor of the City of Łódź and other Łódź City Hall officials to present the current status of the ERF, voluntary planting of 57 trees at Puzzkina Street and trees near the stadium in Widzew district according to the City’s plans – as a form of compensation for the potential future impact of the ERF on this area, installation of 40 air quality sensors in the city (on the buildings of stakeholders such as the Municipality of Łódź, schools, housing estate councils, etc.) with the measurement read-outs made available on the Internet for all stakeholders, as a form of data collection for future comparative analyses of the impact of the ERF on air quality, Veolia Łódź has become a partner of the “Energy Conversion” educational path at the EC1 Science and Technology Centre, a science centre run by the City, Veolia Łódź participates in the Łódź Climate Panel and presented the ERF project at the event, the Investor’s representatives have taken part in local TV and radio debates on the topic, 4 meetings with the Voivode and the Deputy Voivode of Łódzkie concerning the ERF, regular meetings with Deputy Marshals of Łódzkie Voivodeship dedicated to the Project, meeting with the councillors of the City Council elected from Widzew district (20 November 2021), 2 meetings per year presenting the ERF at the Housing Cooperative Managers’ Forum, a series of meetings between the CEO of Veolia Łódź and institutional stakeholders involved in the ERF project: the Director of the WIOŚ, the municipal Chief of the State Fire Service, the RDOS, MPs and senators from Łódzkie Voivodeship, two meetings presenting the ERF to a vulnerable group, allotment users at FAMG Elektron during their general members’ meetings, compensation actions to offset possible future impacts of the ERF on a vulnerable group – users of FAMG Elektron: and monetary donation for the Allotment Users’ House, publication of press material about the ERF in the local press (including the building permit obtained), distribution of ERF promotional materials: printed media (two brochures, presentation boards, a rollup) as well as multimedia (a board to be displayed on LCD screens and a spot on public transport in Łódź) publication of material about the ERF on the website and on the social media platform Facebook.com.
Informing Veolia Łódź employees about the ERF	In March 2020, an official presentation of the ERF was organised for the management and employees of the CHP4 plant (more than 1,000 people). Every meeting of the Veolia Łódź Supervisory Board, where ERF issues are also discussed, is attended by an employee representative. The ERF project is also discussed at management meetings of Veolia Polska and its subsidiaries (e.g. K-40 and K-100 meetings), as well as at internal Veolia Łódź events. Relevant information regarding ERF is presented in an internal newsletter.
Activities related to potential ERF partners	<p>The Investor has selected Doosan as the general contractor for the ERF and has entered into the relevant contract with the company (17 April 2023). Both thermal and electrical energy from the ERF will be taken into the Investor’s own network, which is operated by Veolia Łódź, so there is no need to involve other stakeholders in this regard.</p> <p>Between 2021 and 2024, dozens of meetings were held with stakeholders – potential suppliers of pre-RDF for ERF. As a result of these meetings, letters of intent were signed indicating the possibility of supplying fuel in an amount that fully meets ERF’s demand. Among others, a letter of intent was concluded with Eneris Alternative Fuels Sp. z o.o. regarding fuel supply to ERF (17 March 2023), on the basis of which a final agreement will be concluded in the future.</p> <p>The project was also presented at a number of industry conferences in Rzeszów, Olsztyn, Gdańsk and Kraków.</p>

5. ERF stakeholders and ways of communicating with them

The ERF Investors carried out stakeholder identification and analysis on an ongoing basis at each stage of the Project to date. The previous Investor (City of Łódź) analysed stakeholder groups for public consultation and outreach activities. The current Investor does not have access to the documentation from these internal analyses of the previous Investor.

The current Investor conducted its own stakeholder identification and analysis after taking over the Project in November 2019. The purpose of these activities was to identify groups of people, community and civil society organisations, businesses, government bodies and other institutions that either may be affected by the socio-environmental impacts of the ERF or may have a vested interest in or influence on the implementation of the Project. The results of the stakeholder identification and analysis have been used to develop a stakeholder engagement programme that best meets the needs of these groups (as described in section 6).

Veolia Polska conducted stakeholder identification and analysis in several phases, in relation to different groups and with an appropriate level of detail adequate to the administrative

investigations carried out at the preparatory stage. These included:

- general identification and mapping of stakeholder groups in the following areas: society (e.g. local residents, social organisations, housing associations, Veolia Łódź employees), institutions (e.g. City of Łódź Office, Łódzkie Voivodeship Office, Marshal’s Office of Łódzkie Voivodeship, Ministry of Climate and Environment), media (press, radio, TV, Internet),
- identification and analysis of civil society organisations, including environmental organisations, which have acted and can potentially continue to act as a party in administrative proceedings concerning the ERF,
- identification and analysis of social stakeholders in Widzew district of the City of Łódź (e.g. estate councils, social, cultural, welfare, educational and sports institutions, informal resident groups, entrepreneurs investing in new developments, etc.),
- mapping the political and administrative environment in relation to possible changes after the 2023 elections to the Sejm and Senate of the Republic of Poland (local government of the City of Łódź, local government of Łódzkie Voivodeship, MPs and senators, government administration, housing

cooperatives, social organisations, trade organisations, regional and local press, etc.).

The identification and analysis was conducted on the basis of (among other factors):

- desk research of the registers of associations of the City of Łódź and the websites of civil society organisations / NGOs,
- searches of the BIP and Internet sites of relevant authorities and institutions,
- analyses of press articles and publications on social media related to Łódź, especially Widzew district,
- analysis of maps from the area of potential impact of the ERF and downstream areas,
- information obtained during meaningful consultations with representatives of the City of Łódź, several civil society organisations, housing cooperatives and business organisations in Łódź,
- analysis of projects submitted for implementation as part of the Łódź Civic Budget (2013-2021 editions),
- analysis of stakeholder speeches during administrative proceedings concerning the ERF.

As the construction phase commences, the Investor updates on an ongoing basis the existing identification and analysis of all stakeholder groups in the form of an integrated stakeholder map. This updates will allow the stakeholder engagement programme to be adapted to the currently identified needs of each group. All of these analyses constitute the Investor's internal documentation.

A summary of stakeholder identification and communication methods to date is presented in Table A5.1. The communication methods presented attempt to take into account the different information needs of the different stakeholder groups, their preferred means of communication and potential effectiveness of outreach, e.g. information on notice boards in the Chrobry Estate buildings, presentations at general meetings of FAMG Elektron allotments holders, information on Veolia Polska websites (including the ERF website), in the local press, etc. **The Investor declares they are open to any suggestions for improving the effectiveness of communication with stakeholders. Any such suggestions can be sent to the addresses indicated in section 9.1.**

The approach taken is that, at EU and national level, communication activities towards stakeholders who may make

Table A5.1 Identified ERF stakeholders and means of communication.

Stakeholder groups/stakeholders	Possible means of communication
<p>Parliament (Sejm and Senate): passes laws, holds public hearings on laws, implements EU directives and policies that may affect the ERF into Polish law, may conduct parliamentary audits and officially query government administration</p> <ul style="list-style-type: none"> • senators from the Łódź electoral district; committees of the Senate (Infrastructure, National Economy and Innovation, Climate and Environment) • MEPs from the Łódź electoral district; parliamentary committees (Infrastructure, Environmental Protection, Natural Resources and Forestry, Economy and Development); parliamentary groups (Łódź, Energy and Mining Transformation in Poland, RES Development and Energy Transformation, Energy and Hydrogen) 	<ul style="list-style-type: none"> • membership and active involvement in industry organisations, carrying out lobbying activities for the benefit of the heating, waste management and energy sectors • meetings with MPs from Łódzkie Voivodeship at official events • membership and active involvement in industry organisations, carrying out lobbying activities for the benefit of the heating, waste management and energy sectors
<p>Government administration: creates laws implementing higher-level acts of law, creates national strategies, programmes and concepts for sustainable development, reviews and agrees on certain local government strategic documents, agrees on certain administrative decisions, holds legislative initiative in parliament, influences EU law that may affect the status and condition of the ERF (e.g. the issue of ETS levies), is a higher level administrative body in certain matters; maintains registers and building, environmental and labour inspections, may impose environmental reviews of facilities and installations</p> <ul style="list-style-type: none"> • Minister of Climate and Environment supervises the National Fund for Environmental Protection and Water Management, ("NFOS") and the Voivodeship Fund for Environmental Protection in Łódź ("WFOS"); supervises the departments of District Heating, Renewable Energy Sources, Waste Management; supervises the General Director of Environmental Protection ("GDOŚ"), to whom the Regional Director of Environmental Protection in Łódź ("RDOŚ") reports; supervises the Chief Inspector of Environmental Protection ("GIOŚ"), and supervises the financial settlements company Zarządca Rozliczeń SA; • Plenipotentiaries of the Government and the Prime Minister for the following areas: the Clean Air Programme and energy efficiency in 	<ul style="list-style-type: none"> • official letters, requests and clarifications during administrative procedures • participation in conferences together with officials • meetings with members of the government administration at official events • membership and active involvement in industry organisations; carrying out lobbying activities for the benefit of the heating, waste management and energy sectors

decisions on legislation affecting the ERF will be carried out jointly with other investors and as part of activities undertaken by industry organisations (heating, energy, waste management) of which Veolia subsidiaries are members. These may include the publication of reports, participation in industry conferences, parliamentary and government committee meetings, public hearings, meetings with government administration representatives, press campaigns, educational activities, etc.

At the regional and local levels, relations with administrative stakeholders will mainly involve official correspondence within the framework of the relevant administrative proceedings, the Investor's active participation in public consultations of documents affecting the ERF, but also face-to-face meetings, participation of the Investor in conferences with or under the auspices of the relevant authorities, sending any required letters with information, provision of information as required by programmes, plans and other strategic documents, etc.

In terms of relations with civil society stakeholders, such as the local inhabitants, NGOs (including environmental organisations), local entrepreneurs, socio-educational and cultural institutions, etc., it is assumed that the basis for bilateral communication (both disclosure of information and collection of feedback) will be via electronic channels (the Internet, e-mail). According to data from the Statistical Office in Łódź, the percentage of households in Łódzkie Voivodeship with Internet access in 2023 was 92.3%. The majority of those with Internet access used broadband connections (91.7%), and the percentage of people using the Internet in the Voivodeship was 90.8%, with 84% using the Internet at least once a week.⁷⁵ In the City of Łódź alone, the risk of Internet access exclusion is among the lowest in Poland.⁷⁶ Nevertheless, the Investor understands that vulnerable groups may include people with difficult access to the Internet (e.g. elderly people, people with visual or motor disabilities), as well as those who, by their own choice, may have given up some forms of remote communication. Therefore, other channels of communication are also planned, such as announcements and posters in designated places, press releases and articles in the local printed press, radio and TV programmes, meetings with management bodies, housing estate councils, presentations, a display board with the results of emission monitoring, an educational trail, etc.

Stakeholder groups/stakeholders	Possible means of communication
<p>buildings; renewable energy sources; transformation of energy companies and coal mining; strategic energy infrastructure, national raw materials policy, the country's Chief Geologist;</p> <ul style="list-style-type: none"> Minister of Internal Affairs and Administration (supervises: the Voivode of Łódzkie who in turn supervises the State Voivodeship Sanitary Inspector in Łódź ("Sanepid"), the Łódź Voivodeship Inspector of Environmental Protection ("WIOS"), the Voivodship and Powiat Building Control Inspectors in Łódź ("PINB"); the Voivodeship and City Fire Brigade Chiefs in Łódź; the Voivodeship and City Police Chiefs in Łódź) President of the Energy Regulatory Authority Regional Labour Inspector in Łódź 	
<p>Self-government administration: local self-government of Łódź Voivodeship and local self-government of the City of Łódź take administrative decisions on construction and environmental issues regarding the ERF (issuance of decisions, permits, approvals); the local governments prepare and carry out public consultations and adopt strategic documents such as development strategies, spatial development plans, waste management plans, environmental protection programmes, heat and power supply plans, etc., which may have an impact on the ERF; local government may carry out environmental protection inspections as well as imposing environmental review obligations; furthermore, the local government is responsible for waste management, water and sewage systems, traffic organisation and roads, which may all impact the ERF.</p>	
<ul style="list-style-type: none"> Sejmik Województwa Łódzkiego (Łódzkie Voivodeship Self-government Assembly): councillors' clubs; thematic committees (Agriculture and Environmental Protection; Regional Development, Economy and Safety), councillors from the City of Łódź; Zarząd Województwa Łódzkiego (Board of Łódzkie Voivodeship): Marshal, Deputy Marshals and Members of the Board (supervising the departments of Infrastructure, Climate and Tourism, Environment); Prezydent m. Łodzi (Mayor of Łódź) supervises: the Mayor's Deputies; Secretary; Treasurer; departments including the following: Ecology and Climate, Planning and Economic Development, Labour, Education and Culture, Strategy and Development; City-owned companies and entities, the City's Roads and Transport Management Board, Waste Management Board, EC1 Science and Technology Centre, Water and Sewage Plant, City Investment Board, Łódź Investments, Municipal Cleaning Company, Widzew Social Housing Association, Municipal Greenery Management); Rada m. Łodzi Łódź City Council of Łódź ("RMŁ"): councillors' clubs; committees of the RMŁ (Housing and Communal Economy, Spatial Planning and Architecture, Development and Economic Activity, Environment Protection); councillors from the Widzew district 	<ul style="list-style-type: none"> official letters, requests and explanations during administrative procedures participation in conferences together with representatives of local authorities meetings with members of local government at official events official meetings with members of the local government within the framework of official procedures (e.g. on-call duty) investor participation in public consultations of strategic documents affecting the ERF presentation of the ERF at meetings of collegiate bodies and answers to questions (councils, committees, boards, teams, etc.). invitations to official events organised by the Investor (e.g. in connection with the construction phase, open days, etc.).
<p>Local communities: may have an interest in the implementation of the ERF or influence the Project, express interest and otherwise become involved in its implementation, cooperate based on good neighbourly relations, be a partner in the Investor's information, social and pro-environmental activities, file grievances and complaints, influence other stakeholders, become groups affected by the Project, act as a party in administrative proceedings (in the case of environmental NGOs with a history of at least 12 months of uninterrupted operation), may officially query the City of Łódź local government's subsidiary entities (see below)</p>	
<ul style="list-style-type: none"> Subsidiary entities of the City of Łódź in Widzew District include the councils and boards of housing estates (Olechów-Janów, Widzew-Wschód, Stary Widzew, Andrzejów, No. 33, Dolina Łódki, Nowosolna, Mileszki, Stoki-Sikawa-Podgorze, Zarzew) residents of the City of Łódź, especially the district of Widzew (users of local community services, informal neighbourhood groups) housing cooperatives: management boards, supervisory boards, housing estate councils, general members' meetings (e.g. the following estates: B. Chrobry, Młodzieżowa, "Bawełna", "Dąbrowa", Mieszka I, Stefan Batory, Nauczycielska, "Czerwony Rynek") cultural, educational, care and sport institutions in Widzew district (schools, kindergartens, community centres, sports clubs, recreation facilities) 	<ul style="list-style-type: none"> ongoing updates to the ERF website: description of the Project, disclosure of documents, information on traffic obstructions, construction progress, related events, data from emission monitoring, activities linked to the educational trail at the ERF, etc. ongoing updates to ERF social media pages space made available in the Veolia Łódź premises for accessing and reviewing documents in printed form maintaining relations with local media (see below) sponsored articles in local media leaflets, brochures distributed to mailboxes and to interested residents at community hubs light display board with emission monitoring read-outs the educational trail at the ERF live video coverage of the ERF construction site posters, advertisements printed on notice boards in buildings, in the streets, on the fence of the ERF and CHP4 areas presentations on the ERF, answers to questions provided at meetings of the relevant collegiate bodies (general assemblies, boards of directors, supervisory boards, etc.). sponsoring activities for the benefit of local communities participation in and organisation of events with local community representatives meetings and correspondence with members of the City's subsidiary bodies and housing cooperatives invitations to events organised by the Investor (e.g. connected with the construction phase, open days, etc.) and events for the community (open days, events linked to the educational trail) participation in public consultations of administrative bodies together with representatives of local communities procedure for dealing with grievances and complaints information board and safety notice board in place, as prescribed by the relevant legal regulations
<p>Vulnerable groups⁷⁷: due to their specific personal, social or material situation, they may be excluded or experience various kinds of exclusion (e.g. due to their limited mobility, difficulty in accessing or using electronic communication, age, social status, etc.). They may also be temporarily more</p>	

Stakeholder groups/stakeholders	Possible means of communication
<p>exposed than other groups to the particular impact of the construction phase of the ERF (e.g. through difficulties related to changes in traffic organisation, increased traffic etc.), or they may subjectively feel more exposed than other groups to the impact of the ERF e.g. due to its proximity.</p> <ul style="list-style-type: none"> residents of the nearest buildings on the Olechów-Janów Housing Estate (part of the B. Chrobry Housing Cooperative) Members and users of the "Elektron" ROD Family Allotment Gardens of the regional Polish Allotment Association in Łódź ("FAMG Elektron") entrepreneurs operating in the immediate vicinity of the ERF other individuals who, by their nature, may be more vulnerable than other groups to different types of exclusion: the elderly, those without internet access, the blind and visually impaired, those with limited mobility, the socially excluded, children at risk on their way to school during the construction phase, unemployed women, young people and others. 	<p>All means as presented above for local communities, plus:</p> <ul style="list-style-type: none"> bringing the ERF website up to digital accessibility standards followed by websites of public bodies posters and notices on information boards in FAMG Elektron, housing cooperative buildings and office buildings in the vicinity e-mailing to addresses identified and updated as part of stakeholder mapping information letters sent out to the FAMG Elektron Board, housing associations and administrators of nearby office buildings with a request to disseminate the letters' contents to stakeholders by internal means of communication (e.g. via internal notifications, verbal notifications, on notice boards, on websites, on social media pages, on internal portals, etc.), ad hoc information meetings with members of the boards or collegiate bodies of FAMG Elektron, housing cooperatives, building administrators subject matter consultation taking into account the needs and capacities of these groups through: <ul style="list-style-type: none"> establishing a special e-mail address exclusively for contacting these groups, offering the possibility of submitting questions, complaints, requests, proposals, etc. electronically on an ongoing basis, two grievance and complaint boxes: one near the construction site and the other at the seat FAMG Elektron, to facilitate submitting questions, complaints, requests, proposals etc. on paper, on an ongoing basis. meetings with FAMG Elektron management, cooperative management, including by means of remote communication presentation meetings of the construction of the ERF with members of FAMG Elektron to offer answers at a location convenient for this group, as well as at general meetings of the FAMG Elektron members. <p>The means of communication listed above will be used in accordance with the engagement plans in Tables A6.1 and A6.2.</p>
<p>Civil society organisations, NGOs: may have an interest in or influence on the implementation of the ERF, may influence other stakeholder groups, environmental organisations operating for 12 months+ may also be granted full party status in administrative proceedings concerning the ERF.</p> <ul style="list-style-type: none"> environmental organisations involved in the ERF proceedings Fundacja Instytut Spraw Obywatelskich based in Łódź ("ISO"), Centrum Zrównoważonego Rozwoju z based in Łódź ("CZR"), Towarzystwo na rzecz Ziemi based in Oświęcim ("TNZ"), Stowarzyszenie Wschodząca Energia based in Łódź, other social organisations from Łódź: Łódzkie Obywatelskie Forum Ekologiczne, Kocham Łódź, Tak Dla Łodzi, Ośrodek Działań Ekologicznych Źródła, Fundacja Normalne Miasto - Fenomen, Ruch dla Uczciwości, Obywatele RP Łódzkie, Nowa Łódź, Fundacja Miejski Kolektyw, Fundacja Up-Life, Ostra Zieleń, Topografie, Zero Waste Łódź, Nad Stawem w Łodzi political parties in Łódź active on ERF: Koło Łódź Partia Zieloni (Łódź Circle Green Party), Polish Socialist Party informal social movements: Łódź Jest Nasza, Extinction Rebellion Łódź, Earth Strike Łódź, Youth Climate Strike Łódź 	<ul style="list-style-type: none"> appropriate modes of communication described as for local communities (above) will apply communication will also take place through local media (as described below) and social media participation and presentation of the ERF at conferences, panel discussions, etc. events where representatives of identified community organisations are (or can be) present replying to enquiries by e-mail or in writing, including using the grievances and complaints procedure participation in public consultations involving identified community organisations monitoring the publications of representatives of NGOs and providing clarifications where necessary
<p>Current and potential partners: may have a direct economic interest in the implementation of the ERF, may have an interest or influence in the realisation and operation of the ERF due to their vested power and competences, may influence other stakeholders (e.g. government administration)</p>	
<ul style="list-style-type: none"> The general contractor (Doosan), its subcontractors, suppliers and other contractors involved in the construction phase of the ERF contractors involved in the operation of the ERF during the operation phase potential scientific partners (Technical University of Łódź, University of Łódź, Medical University of Łódź, the Energy Institute - National Research Institute) employers' organisations, chambers of commerce, industry associations (members of the Łódź Energy Wave Cluster, National Chamber of Energy and Renewable Energy Clusters, Economic Chamber of Energy and Environmental Protection, Polish Association of Vocational Heat and Power Plants, Polish Heating Industry Chamber of Commerce) 	<ul style="list-style-type: none"> membership and active involvement in industry organisations carrying out lobbying activities for the benefit of the heating, waste management and energy sectors general information via websites information through the Investor's tendering and purchasing platforms⁷⁸ official business correspondence participation in scientific and professional conferences
<p>Employees: have a vested interest in the construction and operation of the ERF, with potential impact on other stakeholder groups</p> <ul style="list-style-type: none"> prospective employees for the ERF Veolia Łódź employees at the CHP4 plant managers of Veolia Łódź, Veolia Polska and VNEL Trade unions active in Veolia Łódź 	<ul style="list-style-type: none"> communications regarding employees, ethical and compliance matters are beyond the scope of the SEP and are the subject of separate documents in accordance with legislation, Investor standards and EBRD requirements health and safety signs and boards on the construction site in accordance with the law

Stakeholder groups/stakeholders	Possible means of communication
<ul style="list-style-type: none"> employees of the general contractor, its subcontractors, employees of suppliers and other contractors involved in the construction phase of the ERF employees of contractors involved in operating the ERF during the operational phase 	<ul style="list-style-type: none"> the Investor will involve employees on a voluntary basis in volunteering for building good community relations, including with vulnerable groups
Regional and local media: influence other ERF stakeholder groups	
<ul style="list-style-type: none"> Press (Dziennik Łódzki, Express Ilustrowany, Gazeta Wyborcza Łódź) TV editorial offices (Telewizja Polska SA, Łódź Branch, Telewizja Toya) radio stations (Polskie Radio Regional Broadcasting Company in Łódź Radio Łódź SA, Radio Plus Łódź, Radio Parada) editorial boards of Internet portals (Łódź.naszemiasto.pl, dziennikLodzki.pl, expressilustrowany.pl, Lodz.wyborcza.pl, tuLodz.pl, Łódź.twoje-miasto.pl, glosLodzi.pl, Lodzinfo.pl, twojaLodz.pl, informacjeLodzie.pl, Lodz.informator-lokalny.pl, rynekLodzki.pl) individual publicists: freelancers, bloggers (identified on an ongoing basis) 	<ul style="list-style-type: none"> media contact information on the ERF website distribution of press material about the ERF (press releases, backgrounders, photos of construction and operation) press conferences in connection with significant events answers to press enquiries interviews in different forms with representatives of the Investor sponsored articles participation in external conferences and statements to the media use of the Investor's online press offices to distribute press material about the ERF other modes of communication specific to local communities and community organisations

Individuals, civil society organisations, other institutions, entrepreneurs and all other actors who feel that they are not included in Table A5.1 above and who would like to be involved in the Energy Recovery Facility in Łódź (ERF) project are invited to contact the Community Liaison Officer (CLO) at the details indicated in sec. 9.1.

6. Stakeholder programme

The primary objectives of the stakeholder programme are:

- disclosure of relevant information about the ERF during the construction, operation and decommissioning phases, which will help relevant stakeholders to become aware of the possible social and environmental impacts of the Project and how to manage these impacts; primarily, the following documents are disclosed:
 - non-technical summary of the Project,
 - the ESIA and EIRA reports with their addendums,
 - the administrative decisions with their formal justifications (i.e. the Environmental Decision, the “extensions” of the Environmental Decision, the zoning conditions (WZ), the building permit (BP), the amended building permit (ABP)),
 - this SEP and annual reports on stakeholder engagement (sec. 8.4),
 - Project Summary Document (“PSD”) prepared by EBRD and other documents disclosed by the EBRD (e.g. Environmental and Social Action Plan (“ESAP”), Environmental and Social Management Plans (“ESMP”));
- ensure that this disclosure will be done primarily by publishing and making information available through public and free communication channels; primarily these documents are:
 - to be posted for download on the ERF website in “.pdf” file format,
 - in Polish,
 - to be available also in English by providing a hyperlink on the ERF website to the EBRD’s website with disclosed information about the ERF,
 - to be available in printed form by arranging places in the Veolia Łódź premises where it will be possible to read the disclosed environmental and social documents concerning the ERF,
- providing information about ERF to representatives of communities and stakeholder groups for dissemination and, if necessary, providing information through direct consultation – so that the stakeholder engagement process is always based on the receipt of timely and relevant information about the ERF,
- offering stakeholders the opportunity to voice their opinions, expectations, concerns, requests or complaints so that, if they wish, they can be involved in the process of developing and operating the ERF. Thanks to this, measures to minimise the Project’s impact on the environment can be adapted and developed.

Table A6.1 sets out the programme of activities for engaging with stakeholder groups during the construction phase and Table A6.2 covers the operation and decommissioning phases. These programmes will be updated as the ERF construction and subsequent operation progresses. They will also be supplemented by more detailed action plans. The management of the activities envisaged in the stakeholder cooperation programmes follows the principles described in section 8.

Cooperation with stakeholders is documented in accordance with the principles described in section 8.3 and reported on in accordance with section 8.4.

The construction phase is scheduled to start on 1st quarter of 2025. The construction will take approximately 3.5 years. Obtaining an occupancy permit and the start of the operation phase are planned for 3rd quarter of 2028. The ERF will be operated on a long-term basis and the date of its hypothetical decommissioning is currently unknown.

Table A6.1. Programme of cooperation with stakeholder groups. Construction phase.

Anticipated construction phase dates: commencement of construction works 1 st quarter of 2025, obtaining occupancy permit 3 rd quarter of 2028.		
Stakeholder group	Activities	Description and deadlines
Government administration / Local government administration	public consultations of strategic documents of the city of Łódź and Łódzkie Voivodeship	<ul style="list-style-type: none"> participation in consultations leading to the adoption of the General Plan of the City of Łódź, participation in the meetings of the committees of the City Council and the sessions of the City Council (comments, motions, discussion), in accordance with the announced deadlines in the ongoing procedure participation in consultations on the update of the development strategy for Łódzkie Voivodeship - in accordance with the announced deadlines in the ongoing procedure participation in the 2nd public consultation of the Municipal and Environmental Policy of the City of Łódź 2030+, participation in the meetings of the committees of the City Council and the sessions of the City Council planned for Q4 2024.

Anticipated construction phase dates: commencement of construction works 1 st quarter of 2025, obtaining occupancy permit 3 rd quarter of 2028.		
Stakeholder group	Activities	Description and deadlines
		<ul style="list-style-type: none"> participation in consultations on the update of the Directions and Guidelines for the Plan for Heat, Electricity and Gas Supply in the City of Łódź – in accordance with the contractor's enquiries and the deadline for submitting the draft for public enquiry participation in consultations on the draft Waste Management Plan for Łódzkie Voivodeship for the period 2025-2030 with an outlook to the years 2031-2036, with annexes - in preparation participation in public consultations of other strategic documents of the City of Łódź and Łódzkie Voivodeship - in accordance with the relevant procedural deadlines for adopting these documents
	participation in administrative procedures concerning the ERF	<ul style="list-style-type: none"> formal replies to letters from administrative authorities (including complaints) – on an ongoing basis participation in inspections (e.g. of PINB, Fire Dept., labour inspection, etc.) in accordance with relevant legal provisions formal notifications, requests, etc. (notification of construction commencement and completion dates, integrated permit, road lane occupation, occupancy permit, opinion/approval from the Fire Department and the Police, other permits and approvals, etc.). – in accordance with the relevant legal regulations
	additional actions	<ul style="list-style-type: none"> drawing up a calendar of events organised by local and government authorities and other events in which representatives of these authorities participate and in which representatives of the ERF may also take part, and deciding on the participation and form of participation in selected events – by the end of June 2024. updating the above calendar – on an ongoing basis establishing a draft offer of Veolia Łódź social benefits rendered by Veolia Łódź to the City during the construction phase, which may be in the form of voluntary compensation for the impact of the ERF, and agreeing them with representatives of the city of Łódź (e.g. tree planting, construction or installation of recreational and electromobility infrastructure elements, sponsorship of institutions run by the City's, etc.). – by the end of 2024. official briefing by the CEO of Veolia Łódź for the Mayor of Łódź – to be held 2 months before the intended commencement of construction work adoption by Veolia Łódź of a communication plan taking into account, inter alia: information and education campaigns involving the ERF, in which the administrative bodies may be a partner, the calendar of the Investor's events aligned with the construction (e.g. laying of the foundation stone, topping-out, press conferences, etc.) – by the end of 2024, no later than 2 months prior to the intended commencement of the construction works inviting representatives of the government and local authorities to the Investor's events – at least one month before the scheduled dates of these events
Local communities / civil society organisations	disclosure of information about the ERF	<p>By the end of 2024, no later than 2 months before the intended commencement of construction works:</p> <ul style="list-style-type: none"> upgrade of the ERF website⁷⁹ (new sections relevant to the SEP, e.g.: “Documents”, “Construction”, “Grievances and complaints”, “Contact Us”, etc.; technical preparation for video transmission from the construction site) posting a hyperlink to the ERF website in an easily accessible place on the Veolia Łódź and Veolia Polska websites and possibly other Investor websites the following to be posted for download on the ERF website in “.pdf” file format, in Polish: ESIA and EIRA reports, their addendums, Environmental Decision, “extensions” of the Environmental Decision, zoning decision (ZD), building permit (BP), amended building permit (ABP), formal justifications of these administrative decisions, this SEP and annual reports on stakeholder engagement, PSD prepared by EBRD, other documents disclosed by the EBRD (e.g. ESAP, ESMPS) providing a hyperlink on the ERF website to the EBRD's website with disclosed information about the ERF arranging places in the Veolia Łódź premises where it will be possible to read the disclosed environmental and social documents concerning the ERF in printed form a letter to be sent out to the bodies of housing estate councils and cooperatives with information about the intended start of the construction phase and the possibility of stakeholder involvement and a proposal for a meeting with a presentation of the ERF (as below) <p>No later than the start of construction work:</p> <ul style="list-style-type: none"> a yellow information board in accordance with the regulations at the construction site located in a place with good visibility and indicating: the type of construction works and the address where these works are carried out, the date and number of the building permit, the body issuing the decision on the building permit, name and telephone number of the responsible PINB employee, name and telephone number of the Investor's representative, name and telephone number of the site manager a yellow board in accordance with the law containing health and safety data including: the anticipated start and completion dates of construction, maximum number of workers on site at any given time, information on the health and safety plan boards and signs concerning health and safety rules in accordance with regulations installation of video transmission equipment from the construction site and start of transmission installation of information boards on the ERF fence as required by building regulations installation of additional notice boards on the ERF fence distribution of posters, notices and a new printed leaflet on the ERF <p>The following to be performed on an ongoing basis during the construction phase:</p> <ul style="list-style-type: none"> maintaining and updating the above activities, including by the means described in Table A5.1 publication on the ERF website and social media page: photo documentation, information on construction progress, including schedule, delays, temporary traffic organization, safety issues, emergencies, changes in documentation, new administrative proceedings, community events, tree and greenery removal and compensatory planting, Veolia Łódź activities for the city and local communities

Anticipated construction phase dates: commencement of construction works 1 st quarter of 2025, obtaining occupancy permit 3 rd quarter of 2028.		
Stakeholder group	Activities	Description and deadlines
		<ul style="list-style-type: none"> the announcement of a complaints procedure and distribution of a model form for grievances and complaints – in accordance with the contents of sec. 7.1 media reporting – see below
	Meaningful consultations	<p>Before the construction work starts:</p> <ul style="list-style-type: none"> meetings with the interested bodies of housing estate councils and housing associations/cooperatives with a presentation of the ERF and answers to questions (as above) <p>By the end of 2024, no later than 2 months before the intended commencement of construction works:</p> <ul style="list-style-type: none"> adoption by Veolia Łódź of a communication plan including, inter alia: a campaign to promote employment at the ERF, information and education campaigns involving the ERF, a calendar of events for the Investor and sponsorship of other events in Łódź in which local communities may participate, possible opinion surveys performed in the local communities <p>On an ongoing basis during the construction phase:</p> <ul style="list-style-type: none"> repeating the above measures on an annual basis monitoring media and social services for community feedback and providing ongoing clarifications on the ERF website and social services responding to official letters received in relation to stakeholder activities through administrative and judicial channels
Vulnerable groups	additional actions on top of those aimed at local communities and social organisations	<p>By the end of 2024, no later than 2 months before the intended commencement of construction works:</p> <ul style="list-style-type: none"> launch of the additional communication means listed in table A5.1 (availability of the website, grievance and complaint boxes available in the FAMG Elektron building and at the site, e-mailing, posters, notices and leaflets distributed in FAMG Elektron building and office buildings, letters to the relevant boards and possible presentation meetings with answers provided, special e-mail address for contact) <p>Ongoing:</p> <ul style="list-style-type: none"> other means of communication listed in Table A5.1 The Investor will take steps to exercise due care in informing (as early as possible and, if necessary, well in advance) these groups about: <ul style="list-style-type: none"> the planned timing of particular works on the site (starting dates, changes, completion), in particular those which may directly affect these groups (e.g. temporary traffic arrangements, noisy works, increased lorry traffic, anticipated above-standard occupation of parking spaces, etc.). construction-related safety recommendations progress of construction work and changes to their dates and scope works that directly affect these groups (e.g. construction of noise barriers along the northern boundary of the plot as required by the environmental decision, greenery planting, etc.). The Investor will also seek meaningful consultation with these groups to proactively solicit feedback from them on the construction (concerns, questions, demands, proposals for cooperation, etc.) and to take appropriate action (considering the requests, accommodating them, offering alternatives, etc.) (two-way engagement). These consultations will be carried out by the means described in Table A5.1, adhering to the following timeline: <ul style="list-style-type: none"> Information meetings with stakeholder managements (FAMG Elektron, B. Chrobrego Housing Estate) – ad hoc, as needed, and at least every 6 months presentation meetings at general assemblies, etc. – if the stakeholders wish to meet and on the statutory dates of meetings of these bodies (usually once a year)
Regional and local media	activities involving cooperation with journalists	<p>By the end of 2024, no later than 2 months before the intended commencement of construction works:</p> <ul style="list-style-type: none"> media contact information to be posted on the ERF website adoption by Veolia Łódź of a communication plan including, inter alia: information campaigns covering the ERF addressed to the local and regional media, the Investor's calendar of events and sponsorship of other events in Łódź in which journalists from the local and regional media may participate, publication of sponsored articles <p>Before the construction work starts:</p> <ul style="list-style-type: none"> organisation of a press conference on the intended commencement of construction work distribution of press information about the intended commencement of construction work (e-mailing, posting on the ERF website, in the Investor's online press offices) <p>Ongoing:</p> <ul style="list-style-type: none"> use of other means of communication as listed in Table A5.1
Current and potential partners	activities involving partners in cooperation	<p>By the end of June 2024:</p> <ul style="list-style-type: none"> drawing up a calendar of events in which representatives of partners may participate, and in which representatives of the ERF may also participate, and deciding on the participation and form of participation in selected events <p>By the end of 2024, no later than 2 months before the intended commencement of construction works:</p> <ul style="list-style-type: none"> adoption by Veolia Łódź of a communication plan taking into account, inter alia: the Investor's calendar of events traditionally organised in connection with construction (e.g. laying of the foundation stone, topping-out, press conferences, etc.). inviting representatives of the partners to the Investor's events – at least one month prior to the agreed dates of these events reviewing Veolia Łódź and Veolia Polska memberships in professional organisations and deciding on possible memberships in other organisations <p>Ongoing:</p>

Anticipated construction phase dates: commencement of construction works 1 st quarter of 2025, obtaining occupancy permit 3 rd quarter of 2028.		
Stakeholder group	Activities	Description and deadlines
		<ul style="list-style-type: none"> conducting communication with partners by the means described in Table A5.1

Table A6.2 Stakeholder group engagement programme. Operation and decommissioning.

<p>The ERF will be operated on a long-term basis: the date of the hypothetical end of the ERF’s life cycle is currently unknown, therefore the SEP will be updated on an ongoing basis, and its fundamental review will be carried out at least one year before the intended life cycle end phase.</p> <p>Stakeholder engagement during the operational phase will be largely driven by the achievements of stakeholder engagement during the construction phase.</p> <p>Most of the means of communication indicated in Table A5.1 will apply in this phase, too, and iterative activities initiated during the construction phase will also continue, in particular:</p> <ul style="list-style-type: none"> maintenance of the disclosure of relevant environmental and social documents relating to the ERF and their updates – as in the construction phase maintenance and updating of the ERF website procedure for dealing with grievances and complaints (via the Internet, request boxes at ERF and FAMG Elektron, on notice boards) meetings with neighbourhood councils, housing associations and building administrators in the neighbourhood participation in consultations of the strategic documents of the City and the Voivodeship directly and indirectly concerning the ERF maintaining relations with local and regional media adoption of communication plans by Veolia Łódź placing particular emphasis on reaching out to and involving vulnerable groups participation in administrative procedures concerning the ERF, participation in inspections (e.g. fire brigade inspections, the WIOŚ environmental inspections, etc.) – in accordance with the law. <p>New activities in the operational phase that can already be listed will be:</p> <ul style="list-style-type: none"> presentation of the data from noise measurements to the stakeholders: the Mayor and the RDOŚ – 3 months from the date of commencement of use of the ERF carrying out a post-execution analysis of the actual impact of the ERF on the state of the air and noise (with particular emphasis on the FAMG Elektron areas), groundwater, water and sewage management and waste management – within 12 months from the date of launching the ERF, and within 6 months from the date of its launch presenting it to the stakeholders: the Mayor and the RDOŚ disclosing the results of continuous flue gas monitoring based on one of the reference methods and facilitated by the ERF automated measurements, and making them available to the scrutinising institutions: the Marshal of the Voivodeship and the WIOŚ on an ongoing basis; the Investor will enable these (and other entitled) stakeholders to have access to the current and historical data – to be performed on an ongoing basis presentation of the aforementioned data on air emissions from the ERF in digital form on-line on an information board placed on the ERF gatehouse building (northern wall) – on an ongoing basis presentation of the aforementioned data on air emissions from the ERF website – on an ongoing basis inclusion of data covering the ERF in the Investor’s annual sustainability reporting, which will also be disclosed on the Investor’s website and the ERF website an educational path/trail on the premises of the ERF and a related educational programme addressed to schools, cultural institutions, social organisations and all inhabitants of Łódź (the following stages are envisaged: presentation of the facility in the conference room, proceeding to the unloading hall and getting acquainted with the waste reception hub, observing the loading of waste into the bunker, visiting the control room where the tour participants will observe the work of the ERF staff, including the process of loading waste into the grate burners; the tour will also include classes, workshops and other events) – options include upgrading the ERF website to feature this information or development and launch of a separate ERF facility website <p>The timing of the hypothetical decommissioning of the ERF is currently unknown. Therefore, the SEP will be updated with regard to the programme of cooperation with stakeholder groups during the decommissioning phase at least one year before the scheduled end of the operational phase. Stakeholders will be able to submit their proposals, recommendations and observations on the SEP during the operation and decommissioning phases using the contact details provided in sec. 9.1.</p>
--

7. Grievance mechanisms

7.1. Procedure for dealing with grievances and complaints on the ERF

The Investor has implemented a procedure for handling grievances and complaints concerning the Project. The mechanism of the procedure is shown in Figure A7.1 in Appendix 10.1.

A “grievance” or “complaint” is understood as any expressed dissatisfaction in connection with the ERF based on a factual event or merely resulting from a stakeholder’s subjective perception of events. This dissatisfaction can be the result of both the actions (omissions) of all companies of the Investor and of all its contractors in relation to the ERF. The terms “complaint” and “grievance” will be considered equivalent and may be used interchangeably, without regard to the scale, complexity or substance of the matter.

Grievances and complaints are handled in Polish.

The submission of grievances and complaints is free of charge (this does not include the cost of postage, courier charges or paid electronic communication services if such modes of submission are chosen by the stakeholder). The Investor

provides opportunities to deliver grievances and complaints through free channels of communication, as described below.

It is possible to submit grievances and complaints in any form:

- in person at Veolia Łódź (during the construction phase) and at the ERF (during the operation phase),
- by telephone,
- on paper,
- on a grievance/complaint form,
- electronically, using electronic services,
- through grievance and complaint boxes.

Information about the possibility of submitting grievances and complaints with details of the various possible channels are posted on the ERF website (nowaenergiadlodzi.pl), the Veolia Łódź website, the Veolia Polska website, notice boards at the ERF construction site (during the construction phase) and at the ERF gatehouse (during the operation phase) and at the Veolia Łódź premises. Details of the various possible channels for submitting a grievance and complaint is also included in the grievance/complaint form.

A template of a grievance/complaint form is attached to the SEP (Appendix 10.2). The grievance/complaint form and information on the email address for grievances and complaints are published on the ERF website (nowaenergiadlodzi.pl). Hard copies of the forms are also available at the relevant ERF location and at Veolia Łódź's head office. A marked box will be installed at the relevant ERF location for paper grievances and complaints, accessible 24 hours a day.

Grievances and complaints are responded to by the route chosen by the stakeholder submitting the grievance or complaint ("complainant") if the latter indicates their contact details. The complainant is able to submit a grievance or complaint anonymously and is able to reserve the confidentiality of their personal and contact details.

The Investor deals with grievances and complaints on a confidential basis where necessary and possible, ensuring that the complainant is protected from any behaviour, action or omission directed against them in relation to the grievance or complaint ("retaliation"). The Investor will not tolerate any retaliation and will investigate all suspicions of such behaviour and actions. The Investor's contractors are obliged to co-operate during the clarification of any such suspicions.

The grievance mechanism is a two-tier (two-review) procedure.

In the first tier ("first review"), the Community Liaison Officer (CLO) (see section 8.2) is responsible for receiving grievances and complaints.

Grievances and complaints received are recorded in the register of grievances and complaints within 7 working days of receipt. The CLO sends an acknowledgement of receipt of the grievance or complaint to the complainant within this period.

If it is possible to resolve the case immediately, a reply with a proposal of how to resolve the case (proposed solution) is sent to the complainant within 12 working days. If it is not possible to deal with the case immediately, a grievance or complaint investigation will be implemented and a reply with a proposal on how to handle the case (proposed solution) is sent to the complainant within 31 working days.

If the complainant is not satisfied with the proposed solution from the first review, they are entitled to have their grievance or complaint reviewed at the second tier ("re-review") by the designated Complaints Review Panel. The Complaints Review Panel may consist of: members of the management boards of subsidiaries and contractors, individuals holding director positions in subsidiaries and contractors, and representatives of other unaffiliated parties who provide assurance of independence and expertise in the handling of complaints, e.g. mediators, solicitors and barristers.

The request for the re-review can be made in the same manner as described above for the grievance or complaint. The time frames for the answer to the re-review request are the same as those for the answer to the grievance and complaint in the first review.

In any response, the complainant is informed, as appropriate, of the possibility and manner of a re-review by the Complaints Review Panel and/or of the filing of a complaint via administrative (e.g. the Building Control Inspector, the Inspectorate for Environmental Protection) or judicial (e.g. an administrative court) means.

If the investigation requires the complainant or a third party person (e.g. a witness) engagement, their participation is always voluntary and their identity and personal information are carefully protected. They are afforded the opportunity to have someone accompany them in meetings and interviews held as part of the investigation. If the complainant requests that meetings or interviews be conducted with person(s) of the same

gender, the CLO or the Complaints Review Panel will appoint the relevant person(s) accordingly.

The Investor will also adopt a Gender-Based Violence and Harassment (GBVH) Rules. The GBVH Rules will include provisions aimed at preventing discrimination and gender-based violence and harassment of women, migrant workers and other vulnerable groups. The GBVH Rules will be disclosed and publicly available (as described in section 6), and the above-described grievance and complaint handling procedure also covers the possibility for stakeholders to submit grievances or complaints regarding aspects covered by the GBVH Rules.

If the grievance or complaint involves an allegation or conflicts of interest related to CLO, a member of the Complaints Review Panel or any other person involved in implementing the grievance and complaint procedure then this person is excluded from any activity dealing with the first review or the re-review.

The Investor monitors and supervises the implementation of the solutions and compliance with the deadlines, as outlined in the response to the complainant.

The Investor's contractors associated with the ERF are also obliged to follow the procedure for handling grievances and complaints.

The Investor maintains a register of grievances and complaints. An annual report on the implementation of the grievance mechanism will be attached to the reports on cooperation with stakeholders (described in sec. 8.4) and published with them, including on the ERF website (nowaenergiadlodzi.pl).

7.2. IPAM procedure

The EBRD has also implemented an Independent Project Accountability Mechanism ("IPAM") as a last resort for investor grievances. Before invoking this procedure, the procedure provided by the Investor (described in subsection 7.1) is to be applied unless there is a fear of retaliation, in which case IPAM can be used directly. IPAM allows for complaints on environmental, social and disclosure issues on EBRD-financed projects.

IPAM is a procedure independent of the EBRD authorities and provides for a two-pronged approach to concerns: problem-solving and complaint handling. The problem-solving mechanism promotes a non-confrontational search for solutions that are consistent with the wishes of all parties raising objections. Grievance handling is a process to determine whether the EBRD has complied with environmental, social and disclosure standards in accordance with ESP 2019 and the Access to Information Policy ("AIP"). A complaint may be filed by an individual or a community organisation that believes it is affected by a project financed by the EBRD. Complaints made from the time a project is approved for financing until 24 months after the EBRD's financial involvement in the project ceases are subject to the IPAM procedure.

The IPAM website⁸⁰ provides information on how to file a complaint or contact IPAM by email⁸¹ for advice, information on this procedure or on how to file a complaint (in English, German, French and Russian).

7.3. Other procedures for dealing with complaints

A separate grievance procedure will be adopted for employees of the Investor and employees of contractors associated with the ERF.

The prevention of bullying, sexual harassment and other inappropriate behaviour is regulated by internal procedure ZLS.03-ZAS.01 adopted by the Investor (06 June 2023).

However, in the area of ethical and compliance failings, complaints can also be made to the Chief Compliance Officer's email address⁸² and via a dedicated whistleblower website.⁸³

8. SEP management

8.1. Supervision, costs, support, language of cooperation

Responsibility for overseeing, coordinating, organizing and costs of the implementation of the SEP rests with VNEL and the ERF Project Team. Representatives of Veolia Polska, Veolia Łódź, other subsidiaries, as well as all contractors involved in the ERF, within the scope of their competence, provide support in the implementation of the SEP.

Veolia Łódź updates its communication strategy annually and adopts an annual communication plan, which also includes communication with ERF stakeholders. VNEL coordinates and supports these activities with Veolia Łódź.

As a rule, cooperation with stakeholders takes place in Polish. If necessary, selected documents may also be published in

English translation, in particular in accordance with EBRD requirements.

8.2. SEP Working Group and CLO

The Investor shall, at least two months prior to the intended commencement of the construction phase, appoint a SEP Working Group (“**SEP WG**”) consisting of representatives of the subsidiaries and contractors involved in the ERF project, who shall have roles and responsibilities as set out in Table A8.1.

The Investor will appoint at least one Community Liaison Officer (CLO). The CLO shall be a member of SEP WG and shall coordinate its work.

The Investor will endeavour to maintain a balance of males and females among the members of the SEP WG.

Table A8.1 SEP Steering Committee.

Subsidiary/contractor	The role of the representative	Tasks
Veolia Polska	ERF Project Manager	supervision of SEP implementation
Veolia Łódź	Community Liaison Officer(s) (CLO)	Update the stakeholder map in accordance with sec. 5 Maintaining stakeholder relations as per sec. 5 and 6 Oversee SEP monitoring, evaluation and reporting as described in sec. 8, day-to-day coordination of SEP implementation management (conducting SEP WG meetings, drafting staff notes, attending ERF project team meetings, etc.), coordinating the handling of grievances and complaints in accordance with sec. 7.1.
Veolia Polska/Veolia Łódź	designated ERF project staff	support for stakeholder relations
Veolia Łódź	Designated professional staff	Substantive support of the CLO and SEP WG, supervision of the implementation of activities resulting from the SEP within the scope of responsibility of Veolia Łódź
Veolia Polska	designated communication staff	support for stakeholder relations
VNEL	Board members	Substantive support of the CLO and SEP WG, supervision of the implementation of activities resulting from the SEP in VNEL's area of responsibility
Mediadem Consulting ⁶⁴	SEP implementation consultant	Contracted services, e.g.: drafting of documents related to SEP implementation, drafting of recommendations and opinions on stakeholder engagement issues, other forms of support to SEP WG
Doosan	appointed representatives	Substantive support for the CLO and SEP WG, supervision of the implementation of activities arising from the SEP in Doosan's area of responsibility
Veolia Polska, Veolia Łódź, NEL, uninvolved third parties	Complaints Review Panel members	re-reviewing of grievances and complaints in accordance with sec. 7.1

8.3. Documentation, monitoring and evaluation of SEP

All activities related to collaboration with and stakeholder engagement are documented. Full documentation will be implemented by 30 September 2024 and will be internal to the Investor and will consist of:

- a register of stakeholder engagement,
- a template for the staff note of a meeting with a stakeholder (stakeholder group),
- a list of stakeholders and stakeholder groups with contact details of their representatives – updated on an ongoing basis and reviewed for updating at least once a year,
- register of grievances and complaints, as described in section 7.1.

The Investor monitors the implementation of the SEP, and evaluates the effectiveness of its assumptions. These activities are coordinated by the CLO.

The CLO will review the SEP, including the relevant documentation in terms of the achievement of the established SEP indicators in each area and based on the data collected by the organisational units, as per Table A8.2. The SEP will be reviewed and updated as necessary, at least every 6 months

during the construction phase and once a year during the operation phase. The ERF will be operated on a long-term basis and the date of its hypothetical decommissioning is currently unknown. Therefore, the SEP will be updated to include the programme of engagement with stakeholder groups during the decommissioning phase at least one year prior to the scheduled end of the operation phase.

If possible, source data shall be collected by gender (e.g. meeting participants, complainants, etc.) and stakeholder groups (including vulnerable groups). Unless separately agreed otherwise, the periods of analysis for this data are calendar month and calendar year. The CLO and other members of the Steering Committee shall hold at least one monthly meeting (including by means of remote communication) with the Project’s managers regarding the implementation of the SEP, ongoing monitoring and evaluation of the SEP’s implementation. Subsidiaries and contractors will provide the CLO with the necessary source data for analysis.

Events may also occur during the implementation of the SEP that will require an immediate response from members of the project team.

Table A8.2. Indicators for monitoring and evaluation of SEP implementation.

SEP area	Performance indicators	Source data	Source data collection and roles responsible for analysis
Disclosure of information	<ul style="list-style-type: none"> Change in the number of ERF news items published on the ERF website (q-o-q, y-o-y) Percentage of published ERF documents in relation to those planned in the SEP Number of Investor websites where ERF information was disclosed vs. number of all Investor websites number of stakeholder websites where ERF project documents have been published 	<ul style="list-style-type: none"> website management systems BIP tracking services media monitoring services 	subsidiary communication directors, SEP implementation consultant, CLO
Public consultation	<ul style="list-style-type: none"> number of stakeholder meetings at which the Project was discussed vs. the number planned in the SEP number of public consultations in which the Investor's representatives participated vs. number of all consultations involving strategic documents potentially related to the IOE 	<ul style="list-style-type: none"> BIP tracking services memos register of stakeholder involvement 	CLO, Project Manager
Involvement of local communities and community organisations	<ul style="list-style-type: none"> number of actions implemented vs. number included in adopted communication plans and SEPs change in the number of comments in community services (m-o-m, y-o-y) number of positive and neutral vs. negative comments in social media change in number of complaints, requests, reviews from local communities (m-o-m, y-d-y) number of cases brought to administrative or legal proceedings by local communities or social organisations number of people present at meetings vs. number expected number of comments and proposals concerning (directly and indirectly) the ERF in public consultations of strategic documents number of meetings with representatives of local communities and social organisations vs. the number planned in the SEP number of activities targeting vulnerable groups vs. number of activities planned in the SEP 	<ul style="list-style-type: none"> media monitoring services register of grievances and complaints register of stakeholder involvement attendance lists and staff notes reports from the legal departments BIP tracking services Veolia Łódź and Veolia Polska communication plans 	CUW, subsidiaries' communication directors, SEP implementation consultant, CLOs, subsidiaries' legal departments
Involvement of administrative authorities	<ul style="list-style-type: none"> number of meetings with representatives of self-government or governmental bodies vs. number of such meetings planned in SEP and adopted communication plans number of letters exchanged with administrative authorities 	<ul style="list-style-type: none"> register of stakeholder involvement attendance lists and staff notes reports from the legal departments 	CLO, legal departments of subsidiaries
Media involvement	<ul style="list-style-type: none"> number of mentions of the ERF vs. number of press releases distributed number of journalists present at a press conference vs. number of journalists invited number of press enquiries concerning the ERF number of positive and neutral vs. negative mentions of the ERF 	<ul style="list-style-type: none"> media monitoring services attendance lists register of stakeholder involvement 	CUW, subsidiary communication directors, SEP implementation consultant, CLOs
procedure for dealing with grievances and complaints	<ul style="list-style-type: none"> change in the number of complaints, applications, reconsiderations (m-o-m, y-o-y) number of cases referred to administrative or judicial proceedings vs. number of complaints and applications and change (y-o-y) 	<ul style="list-style-type: none"> register of grievances and complaints reports from the legal departments 	CLO, legal departments of subsidiaries
monitoring and reporting	<ul style="list-style-type: none"> number of recurring issues in information received from stakeholders included in SEP implementation activities 	<ul style="list-style-type: none"> all of the lines above 	CLO, subsidiary communication directors, SEP implementation consultant

8.4. Reporting to stakeholders

The Investor will publish on an ongoing basis information for stakeholders on progress during the construction phase of the ERF, reports on construction and other activities undertaken for stakeholder groups, and during the operation phase, also the results of emissions measurement – in line with the stakeholder engagement programme outlined in section 6.

The Investor will produce annual reports on stakeholder engagement taking into account how stakeholder information has been used in the implementation of the Project. These reports will include:

- during the construction phase: information on the progress of the ERF construction, information on delays in the construction schedule (if any),
- during the construction and operation phases: information on changes in environmental and social conditions, ERF design

changes, countermeasures to reduce the impact of the ERF on the environment, significant changes in the SEP, summary of activities for individual stakeholder groups, summary of stakeholder engagement, summary of other environmental activities,

- report on the implementation of the grievances and complaints procedure described in sec. 7.1.

The Stakeholder Engagement Report will be published on the ERF website along with other annual reports on environmental and social issues produced in accordance with ESP 2019 and relevant ESP performance requirements (EBRD PRs).

In addition, from the reporting year 2025 onwards, the Investor will be required to provide information on environmental, social and human rights issues and corporate governance in its management report in accordance with Directive 2022/2464.⁸⁵ This information will also include data covering the ERF. A

hyperlink to the Investor's report with this information will be published on the ERF website.

9. Contacts

9.1. Community Liaison Officer (CLO)

The CLO will be the first and main point of contact for most stakeholder groups. Contact details of the CLO will be included in all information and channels addressed to stakeholders.

Until the CLO and other members of the SEP WG are appointed, stakeholders may contact the Investor using the following details:

- Robert Warchoń
- Position: Communication Director,
- mailing address: ul. J. Andrzejewskiej 5, 90-975 Łódź,
- e-mail: wnioski.zoelodz@veolia.com

- landline: +48 42 675 56 92,
- mobile phone: +48 667 620 622,
- website: www.nowaenergiadlalodzi.pl

If a stakeholder makes a request to contact a member of the SEP WG of the same gender as the stakeholder, the CLO will provide the relevant contact details.

9.2. Other relevant authorities

Contact details of other authorities relevant to the construction and operation phases of the ERF are provided in Table A9.1 below.

Table A9.1 Contact details of authorities relevant during construction and operation of the ERF.

Authority	Contact details
City of Łódź	ul. Piotrkowska 104, 90-926 Łódź, tel.: (42) 638-44-44, e-mail: lckm@uml.lodz.pl
Marshal's Office of Łódzkie Voivodeship	al. Piłsudskiego 8, 90-051 Łódź, tel. (42) 663 30 00, e-mail: info@lodzkie.pl
Łódzkie Voivodeship Office	ul. Piotrkowska 104, 90-926 Łódź, tel.: (42) 664-10-00, e-mail: kancelaria@lodz.uw.gov.pl
Municipal Headquarters of the State Fire Service in Łódź	ul. Zgierska 47, 91-446 Łódź, tel.: (42) 61-63-000, tel. interw.: 998, 112, e-mail: lodz@lodzkie.straz.gov.pl
Łódź Municipal Police Headquarters	ul. Sienkiewicza 28/30, 90-114 Łódź, tel.: (47) 841 10 91, tel. interw.: 997, 112, e-mail: komendant@lodz.ld.policja.gov.pl
Municipal Guards Headquarters in Łódź	ul. Wólczańska 121/123, 90-521 Łódź, tel.: (42) 250 22 01, tel. interw.: 996, e-mail: sekretariat@strazmiejska.lodz.pl
PINB – Powiat Building Control Inspectorate in Łódź	ul. Warecka 3, 91-202 Łódź, tel. (42) 655 80 36, e-mail: kancelaria@lodz.pinb.gov.pl
WIOŚ – Voivodeship Inspectorate for Environmental Protection in Łódź	ul. Lipowa 16, 90-743 Łódź, tel.: (42) 633 33 43, tel. interw. (42) 721 111 213, e-mail: sekretariat@wios.lodz.pl, e-mail interw.: awarie@wios.lodz.pl
Sanepid – Sanitary and Epidemiological Station in Łódź	ul. Przybyszewskiego 10, 93-189 Łódź, tel. (42) 253-99-00, tel. interw.: 600 241 646, e mail: sekretariat.psse.lodz@sanepid.gov.pl
State Labour Inspectorate	al. Kościuszki 123, 90-441 Łódź, tel.: (42) 636 23 13, e mail: kancelaria@lodz.pip.gov.pl

10. Annexes

10.1. Procedure for handling grievances and complaints regarding the ERF

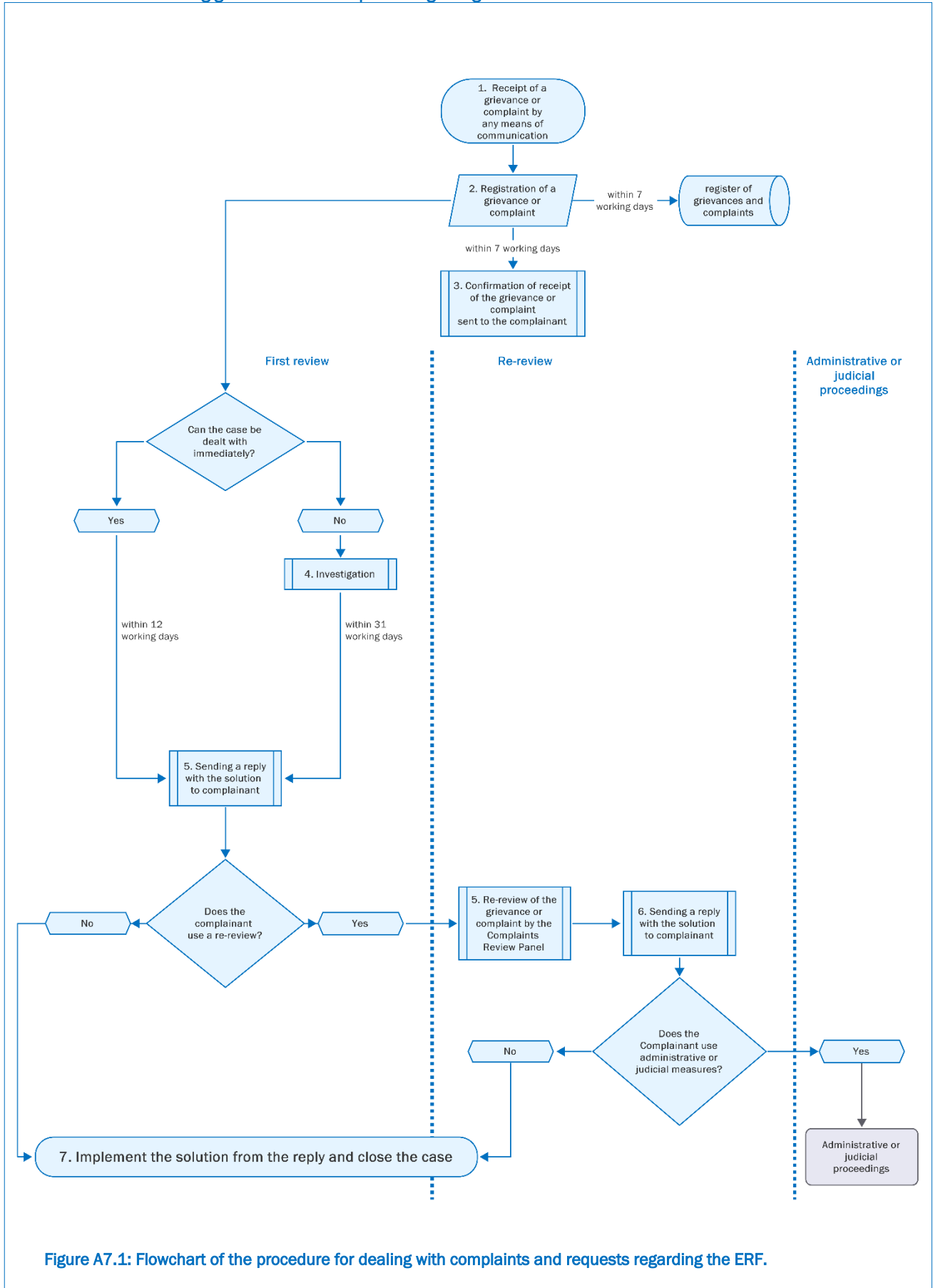


Figure A7.1: Flowchart of the procedure for dealing with complaints and requests regarding the ERF.

10.2. Model grievance and complaint form

Grievance / Complaint		Ref no.:
concerns: Energy Recovery Facility in Łódź, ul. Jadzi Andrzejewskiej 5		
<p>The completed printed form can be:</p> <ul style="list-style-type: none"> sent by post to: Veolia Nowa Energia Sp. z o.o., ul. J. Andrzejewskiej 5, 90-975 Łódź, Poland or dropped it into one of the grievance and complaint boxes installed on the fence of the building site at J. Andrzejewskiej 5 in Łódź or at the premises of the ROD "Elektron" Family Allotment Gardens at ul. J. Andrzejewskiej 4 in Łódź or scanned and emailed to: wnioski.zoelodz@veolia.com <p>The form can also be completed electronically at: www.nowaenergiadlalodzi.pl</p> <p>In matters concerning grievances and complaints you can contact the Grievances and complaints Inspector: Robert Warchoń, position: Communication Director, correspondence address: ul. J. Andrzejewskiej 5, 90-975 Łódź, e-mail: . wnioski.zoelodz@veolia.com, tel: . +48 42 675 56 92, mobile: +48 667 620 622</p>		
On the form, please fill in the white boxes as you wish or insert an 'X' in the appropriate box of your choice.		
Please provide contact information at your discretion. Personal data will be treated confidentially.		
<p>The administrators of the personal data contained in the form below are Veolia Nowa Energia Sp. z o.o. and, as applicable, other companies from the Veolia group listed at the electronic address "veolia.pl/polityka-prywatnosci". The administrators process this data for the purpose of handling the complaint or grievance based on legitimate interest (Article 6(1)(f) of the GDPR). The data provider has the right to access, rectify, delete, restrict processing, transfer data, object to processing, and withdraw consent. Full information on the processing of the personal data provided is available in the Privacy Policy published online at: "veolia.pl/polityka-prywatnosci".</p> <p>Please note that in order to submit a grievance or complaint anonymously, you must fill in the relevant content field below, leaving the fields for personal information blank – such a grievance or complaint will still be addressed, but without a response.</p>		
Anonymous notification	<input type="checkbox"/> I want to make a grievance or complaint anonymously	
Name	
Contact details Please indicate your preferred means of obtaining a response to your grievance or complaint	<input type="checkbox"/> By e-mail (please provide your e-mail address):..... <input type="checkbox"/> By phone (please provide your phone number): <input type="checkbox"/> By post (please provide your mailing address):	
Please describe the reason for the grievance or complaint, e.g. the event / action / its omission related to the construction of the Energy Recovery Facility at ul. J. Andrzejewskiej 5 in Łódź and any other circumstances (e.g. place, time, entities / persons involved, consequences, etc.). If there is not enough space, please complete the description on the second page of the form and, possibly, on attached sheets.		
Content of the grievance or complaint	
Time of event	<input type="checkbox"/> one-time (date): <input type="checkbox"/> several times (how many times, approximate dates): <input type="checkbox"/> still occurs / ongoing (since when?): <input type="checkbox"/> has not yet occurred, but may occur (when?):	
What is the expected / proposed solution or other action requested in response to your grievance or complaint?	
Please submit this form in one of the ways indicated in the first box. Thank you.		

10.3. Abbreviations and definitions of terms

Concept	Definition/explanation
BIP	Public Information Bulletin (pl. "Biuletyn Informacji Publicznej")
CHP4	"CHP4 Combined Heat and Power Plant" at ul. Andrzejewskiej 5 in Łódź, owned by Veolia Łódź
CLO	(Community Liaison Officer) Stakeholder liaison coordinator(s) for the ERF appointed by the Investor
community organisation / NGO	a non-profit organisation, in particular: an association, a foundation, a cooperative organisation, a trade union, a socio-professional organisation, including organisations of farmers, a chamber of commerce, an employers' organisation, a political party, a church or religious association, a sports club, a professional self-government, another public law association established by law or by resolution, an institution for culture, education or science
Complainant	person making the grievance or complaint
complaint or grievance	any expressed dissatisfaction in relation to the ERF based on a factual event or merely resulting from a stakeholder's subjective perception of events. Such dissatisfaction may be the result of either the actions or inactions of all companies of the Stakeholder or of all its contractors in relation to the ERF. The terms "complaint" and "request" and "grievance" will be considered equivalent and may be used interchangeably, without regard to the scale, complexity or substance of the matter
Complaints Review Panel	A Complaints Review Panel appointed by the Investor, which may include: members of the boards of directors and officers of subsidiaries and counterparties, as well as representatives of other unaffiliated parties who provide assurance of independence and expertise in the handling of complaints, such as mediators, legal advisers or lawyers.

Concept	Definition/explanation
disclosure of information	making information publicly available in an easily accessible manner, including the publication of documents, on relevant matters relating to the ERF, in particular on identified environmental and social impacts and risks and on methods of mitigating them, whether or not required by law
Doosan	the consortium selected as general contractor for the ERF formed by Doosan Enerbility Co., Ltd. and Doosan Lentjes GmbH
EBRD	European Bank for Reconstruction and Development
EIA	the environmental impact assessment provided for by law
environmental organisation	a civil society organisation whose statutory objective is environmental or nature conservation
ERF	Energy Recovery Facility in Łódź, the Investor's construction project in Łódź at J. Andrzejewskiej 5 formerly known as the TWCF
ESP 2019	EBRD Environmental and Social Policy of April 2019
Investor	collectively the companies: Veolia Energia Polska SA (Veolia Polska) and Veolia Nowa Energia Sp. Z o.o. (VNEL or SPV)
IPAM	(Independent Project Accountability Mechanism), an independent review mechanism implemented by the EBRD as a last resort for investor complaints.
meaningful consultations	any open, non-discriminatory, non-retaliatory, non-manipulative, documented, administrative or non-administrative process relating (directly or indirectly) to the ERF which is preceded by disclosure of information to the stakeholder or group of stakeholders concerned and which gives them the opportunity to make comments, proposals or objections without constraint, in a form adapted to their abilities and needs, to be considered (taken into account) in the process
NSA	Supreme Administrative Court (pl. "Naczelny Sąd Administracyjny")
PINB	Building Control Inspector in Łódź (pl. "Powiatowy Inspektor Nadzoru Budowlanego")
previous investor	the City of Łódź (represented by the Mayor of Łódź and the staff of the City of Łódź), which was the investor in the ERF Project until 2017
procedure for dealing with grievances and complaints	A non-administrative and non-judicial grievance mechanism, mode of dealing with stakeholder grievances and complaints relating to the ERF implemented by the Investor and based on the principle of voluntariness and two instances (first and second review), as a result of which the stakeholder receives a response to their grievance or complaint with a description of how the grievance or complaint has been dealt with (implementation of a solution, action or omission, etc.); separate from the mode of dealing with grievances and complaints relating to labour and consumer issues
public consultation or participation	meaningful consultations in which any stakeholder can take part
query or request	any request, remark, comment, opinion, question, objection, concern or other form of information received by the Investor in relation to the IRO which is not a complaint as defined above
RDOŚ	Regional Director for Environmental Protection in Łódź (pl. "Regionalny Dyrektor Ochrony Środowiska")
retaliation	conduct, acts or omissions directed against the complainant in connection with his/her grievance or complaint
RmŁ	City Council of Łódź (pl. "Rada Miejska w Łodzi")
Sanepid	Łódź Regional Sanitary Inspector in Łódź (pl. "Łódzki Państwowy Wojewódzki Inspektor Sanitarny w Łodzi")
second review	a possible second instance (tier) procedure under the grievances and complaints procedure involving a review of the complaint or review by the CRP at the request of a stakeholder
SEP	Stakeholder Engagement Plan; this plan for engaging with stakeholders of the ERF during the construction and operation phases
SEP WG	SEP Working Group appointed by the Investor and coordinated by the CLO
SKO	Local Government Appeal Board in Łódź (pl. "Samorządowe Kolegium Odwoławcze")
social media service	a service provided electronically over the Internet telecommunications network to enable its users to share content with other users or the general public; social networking services can take the form of social media, discussion forums, newsgroups, comments on other publications, etc.
stakeholders	various persons or groups who are (directly or indirectly) affected by or likely to be affected by, or have an interest in, the implementation of the ERF
subsidiary	Veolia Polska, Veolia Łódź and VNEL and another company in which Veolia Polska, Veolia Łódź or VNEL is the parent company under commercial law
SWŁ	Łódź Voivodship Assembly, Sejmik Województwa Łódzkiego (pl. „Sejmik Województwa Łódzkiego”)
TWCF	Thermal Waste Conversion Facility, previously used equivalent for the ERF
UMŁ	City of Łódź Office (pl. "Urząd Miasta Łodzi")
Veolia Łódź	Veolia Energia Łódź SA
Veolia Polska	Veolia Energia Polska SA
VNEL	Veolia Nowa Energia Sp. z o.o.
vulnerable groups	persons or groups of persons who may be more likely than others to be adversely affected by the ERF due to characteristics such as gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youth and older persons), physical or mental disability, literacy, political opinion or social status. Vulnerable persons and/or groups may also include, but are not limited to, those living below the poverty line, those who do not own land, single-person households, natural resource-dependent communities, migrant workers, refugees, internally displaced persons or other displaced persons who may not be protected under national legislation and/or public international law. (ESP 2019, part II: definitions)
WIOŚ	Voivodeship Inspectorate for Environmental Protection in Łódź (pl. "Wojewódzki Inspektor Ochrony Środowiska")
WSA	Voivodeship Administrative Court in Łódź (pl. "Wojewódzki Sąd Administracyjny w Łodzi")

10.4. Footnotes

¹ Resolution No. LXIX/1753/18 of the City Council of Łódź of 28 March 2018, as amended. (published at the electronic address: <https://mpu.lodz.pl/opracowania/studium/>)

² Examples include:

- Waste Directive 2008/98/EC (energy recovery from waste with a high level of energy efficiency),
- Operational Programme Infrastructure and Environment (reduction of landfill waste),
- waste management plans for the Łódzkie Region from 2008. (ERF is on the list of investments, as described in Table A4.1),
- National Air Protection Programme (development of district heating to support low emissions),
- National Programme for the Development of a Low-Carbon Economy (development of a low-carbon economy while ensuring sustainable national development),
- Long-term Strategy of National Development. Poland 2030. The Third Wave of Modernity (ensuring energy security and protecting and improving the environment through modernising infrastructure and energy security),
- Strategy for Responsible Growth to 2020 (with an outlook to 2030) (compliance with principles),
- Security of Energy and Environment Strategy (better use of national energy resources, improvement of energy efficiency, reduction of energy impacts),
- Innovation and economic efficiency strategies "Dynamic Poland 2020". (increase in efficiency in the use of natural resources and raw materials),
- Łódź Voivodeship Environmental Protection Programme 2016 for 2017-2020 with an Outlook to 2024 (improving air quality while ensuring energy security in the context of climate change),
- Environmental Protection Programme for the City of Łódź 2018 - 2021 with an outlook to 2025 (improving air quality in the city),
- Łódź Integrated Development Strategy 2020+ (compliance with priority action areas),
- Low Carbon Management Plan for the City of Łódź (compliance with objectives and strategic actions to restore air quality standards),
- Air protection programme for the Łódź agglomeration zone (ensuring good air quality and climate protection).

A detailed discussion of the ERF's compliance with these documents can be found in the EIRA report published on the Investor's website at the following electronic address: <https://nowaenergia.lodz.pl/ERF-TWCF/czym-jest-ERF>.

³ Fig. 1. Project cycle and Stakeholder engagement, [in:] GN10, p. 8.

⁴ Regulation of the Council of Ministers of 10 September 2019 on projects likely to have a significant impact on the environment (Journal of Laws 2019, item 1839).

⁵ at the electronic address: <https://ecportal.pl/>

⁶ amended by the Resolution No. XXXIII 033/20 of the City Council in Łódź of 14 October 2020. (Official Gazette of Łódzkie Voivodeship No. 5757)

⁷ Annex to the Ordinance No. 6302/VIII/21 of the Mayor of Łódź of 21 January 2021 on the Introduction of Instructions on Social Consultations with the Inhabitants of the City of Łódź (published in the BIP at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=54813&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct)

⁸ European Bank for Reconciliation and Development. Environmental and Social Policy, April 2019 (published electronically at: <https://www.ebrd.com/environmental-and-social-policy.pdf>)

⁹ This can include, for example:

- ISO 9001 Quality management systems,
- ISO 14001 Environmental management systems,
- ISO 45001 Occupational health and safety management systems,
- ISO 37001 Anti-Corruption Management System

¹⁰ BREEM International New Construction 2016 Technical Manual. SD233 2.0, pp. 34-41.

¹¹ at the electronic address <https://bip.lodzkie.pl/ogloszenia/komunikaty/item/11194-obwieszczenie-o-podaniu-do-publicznej-wiadomo%C5%9Bci-informacji-o-przyj%C4%99ciu-strategii-rozwoju-wojew%C3%B3dztwa-%C5%82%C3%B3dzkiego-2030-oraz-informacji-o-udziale-spo%C5%82ecze%C5%84stwa-w-jej-sporz%C4%85dzeniu>

¹² at the electronic address: <https://bip.lodzkie.pl/ogloszenia/konsultacje-spoleczne/item/14649-przyst%C4%85pienie-do-aktualizacji-strategii-rozwoju-wojew%C3%B3dztwa-%C5%82%C3%B3dzkiego-2030-oraz-wszcz%C4%99cie-post%C4%99powania-w-sprawie-przeprowadzenia-strategicznej-oceny-oddzia%C5%82ywania-na-%C5%9Brodowisko>

¹³ at the electronic address: <https://bip.lodzkie.pl/item/411-wykaz-uchwa%C5%82-sejmiku-wojew%C3%B3dztwa-%C5%82%C3%B3dzkiego-podj%C4%99tych-w-2012-r>

¹⁴ at the electronic address: http://konsultacje.atmoterm.pl/pos_lodzkie_2016

¹⁵ at the electronic address: <https://bip.lodzkie.pl/urząd-marszałkowski/programy/archiwum-program%C3%B3w/item/11471-programy-ochrony-%C5%9Brodowiska>

¹⁶ at the electronic address: <https://bip.lodzkie.pl/urząd-marszałkowski/programy/item/11490-program-ochrony-%C5%9Brodowiska-wojew%C3%B3dztwa-%C5%82%C3%B3dzkiego-na-lata-2021-2024-z-perspektyw%C4%85-do-2028>

¹⁷ WMP 2011, Table 78, line IV-5, p. 133.

¹⁸ at the electronic address: <http://www.bip.lodzkie.pl/bip/podmiotowe/urząd/programy/srodowisko/>

¹⁹ at the electronic address: <https://bip.lodzkie.pl/urząd-marszałkowski/programy/item/11565-plan-gospodarki-odpadami-dla-wojew%C3%B3dztwa-%C5%82%C3%B3dzkiego-na-lata-2019-2025-z-uwzgl%C4%99dnieniem-lat-2026-2031-wraz-z-za%C5%82%C4%85cznikami>

²⁰ at the electronic address: <https://bip.lodzkie.pl/ogloszenia/komunikaty/item/14148-og%C5%82oszenie-o-przyst%C4%85pieniu-do-opracowania-projektu-planu-gospodarki-odpadami-dla-wojew%C3%B3dztwa-%C5%82%C3%B3dzkiego-na-lata-2025-2030-z-uwzgl%C4%99dnieniem-lat-2031-2036-wraz-z-za%C5%82%C4%85cznikami>

²¹ at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=29670&tx_edgeregals_legalacts%5Bcontroller%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct

²² Ordinance No. 7923/VIII/21 of the Mayor of the City of Łódź of 29 July 2021 on implementing the first stage of public consultations regarding the assumptions of the Municipal and Environmental Policy of the City of Łódź 2030+ (published in the BIP under the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=56434&tx_edgeregals_legalacts%5Bcontroller%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct)

²³ at the electronic address: <https://bip.um.lodz.pl/ostatnio-dodane/artykul/pierwszy-etap-konsultacji-spolecznych-dotyczacych-zalozen-polityki-komunalnej-i-ochrony-srodowiska-miasta-lodzi-2030-id42523/2021/8/3/>

²⁴ at the electronic address: <https://uml.lodz.pl/konsultacje/zblizajace-sie-konsultacje/>

²⁵ at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=25398&Hash=45058467f175b12ae842dcb54c29f77a

²⁶ at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=46240&Hash=aab32ba076492ccbbba6a6437b01844

²⁷ at the electronic address: <https://bip.um.lodz.pl/urząd-miasta/ogloszenia-i-zawiadomienia/ogloszenia-urzedu-miasta-lodzi/archiwum-ogloszen-2022-r/ogloszenie-9699/konsultacje-spoleczne-projektu-programu-ochrony-srodowiska-dla-miasta-lodzi-na-lata-2024-2027-z-perspektywa-do-roku-2031-wraz-z-prognoza-oddziaływania-na-srodowisko-projektu-programu-ochrony-srodowiska-dla-miasta-lodzi-na-lata-2024-2027-z-perspektywa-do-roku-2031-id66008/2023/10/9/?cHash=0f4f77bb194ddb832fd70701bfc337&metricShow#metricBox>

²⁸ at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=66043&Hash=ce4bd24a2fbbd064d9cd814b784fa24f

²⁹ SDF 2010, r. XIX.7, p. 224.

³⁰ SDF 2010, r. XV.4, p. 152.

³¹ Resolution No. IV/60/07 of the City Council in Łódź of 17 January 2007. (published in BIP: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=18001&Hash=6f7ee78df3413e9c8f101f9f72150322)

³² at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=21052&Hash=c52e908cc3cf2b7253f0a137322b1675

³³ at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=22533&Hash=55689dab9be81017e936199570e1c892

³⁴ at the electronic address: https://bip.um.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5BlegalAct%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=24505&Hash=5f6c363025e0846b2f56b6deba72b575

- ³⁵ Adopted by Resolution No. LXIX/1753/18 of the City Council in Łódź of 28 March 2018, amended by Resolution No. VI/215/19 of the City Council in Łódź of 6 March 2019.
- ³⁶ SDF 2019, Conditions, chap. 13.6, table 40, v. 9, pp. 320, 329.
- ³⁷ Resolution No. LXVI/1416/13 of the City Council of Łódź of 3 July 2013. (published in BIP: https://bip.uml.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5Baction%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=30818&cHash=17306ad507227a07306f9d8eaedff5ce)
- ³⁸ at the electronic address: <https://mpu.lodz.pl/opracowania/studium/studium-uwarunkowan-i-kierunkow-zagospodarowania-przestrzennego-miasta-lodzi-2018-39/>
- ³⁹ at the electronic address: https://mpu.lodz.pl/files/mpu/public/STUDIUM/obowiazujace/2018_SDF_o.pdf
- ⁴⁰ changes are published at the following electronic address: <https://mpu.lodz.pl/opracowania/studium/>
- ⁴¹ Resolution No. LXXXVII/2635/24 of the City Council of Łódź of 21 February 2024 (published in the BIP: <https://mpu.lodz.pl/opracowania/plan-ogolny/>)
- ⁴² at the electronic address: <https://mpu.lodz.pl/opracowania/plan-ogolny/>)
- ⁴³ Resolution No. XXVIII/578/99 of the City Council of Łódź of 29 December 1999 (published in BIP: https://bip.uml.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5Baction%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=6903&cHash=97ce5b5092845efcb1afdb52f9f45daa)
- ⁴⁴ Resolution No. LXXVIII/1630/13 of the City Council of Łódź of 27 December 2013. (published in the BIP: https://bip.uml.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5Baction%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=31995&cHash=6b233393e5b3a8ab70efa26620fc21fe)
- ⁴⁵ Resolution No. LXII/1616/17 of the City Council of Łódź of 13 December 2017. (published in the BIP: https://bip.uml.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5Baction%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=43596&cHash=47a68cb5d5e82c868c769854cd1f4566)
- ⁴⁶ Resolution No. LI/1570/21 of the City Council of Łódź of 8 December 2021. (published in BIP: https://bip.uml.lodz.pl/samorzad/akty-prawne-i-projekty-aktow-prawnych/akty-prawne/?tx_edgeregals_legalacts%5Baction%5D=show&tx_edgeregals_legalacts%5Bcontroller%5D=LegalAct&tx_edgeregals_legalacts%5BlegalAct%5D=57786&cHash=a9f18050ffc5081302a7372ebdb56eca)
- ⁴⁷ GHEGS, pp. 74, 95-96, 98, 100, 111.
- ⁴⁸ GHEGS, p. 73.
- ⁴⁹ GHEGS, pp. 72-74.
- ⁵⁰ notice published at: <https://ezamowienia.gov.pl/mo-client-board/bzp/notice-details/2024%2FBZP%2000104911%2F01>
- ⁵¹ notice published at: https://ezamowienia.gov.pl/mp-client/search/tenderdocument/ocds-148610-b2fbefc-c3ff-11ee-bbfa-e29e26ebc6e1/ocds-148610-b2fbefc-c3ff-11ee-bbfa-e29e26ebc6e1_8
- ⁵² Decision No. 51/U/2010 of the Mayor of Łódź of 28 June 2010.
- ⁵³ UML does not maintain a public archive of announcements in the BIP and therefore the date of this announcement cannot be determined.
- ⁵⁴ the decision of the Mayor of the City of Łódź of 25 August 2014 stating that the implementation of the planned project consisting in the "Construction of the Thermal Waste Conversion Installation at 5 Jadzia Andrzejewska Street in Łódź" will be carried out in stages and that the conditions specified in the decision of the Mayor of the City of Łódź No. 51/U/2010 of 28 June 2010 on the environmental conditions for the implementation of the said project, mark: DSS-OŚRII.6220.122.2014, have not changed.
- ⁵⁵ decision of the Mayor of the City of Łódź of 20 June 2016 stating that the implementation of the planned project consisting in the "Construction of the Thermal Waste Transformation Installation at 5 Jadzia Andrzejewska Street in Łódź" proceeds in stages and that the conditions for the implementation of the project specified in the decision No. 51/U/2010 on environmental conditions issued by the Mayor of the City of Łódź on 28 June 2010, mark: DSS-OŚRII.6220.100.2016, are valid.
- ⁵⁶ Decision of the Mayor of Łódź No. DAR-UA-IX.944.2020 of 2 July 2020.
- ⁵⁷ decision of RDOŚ in Łódź of 27 August 2021, mark WOOŚ.4222.7.2020.DKR.13
- ⁵⁸ Decision No. DPRG-UA-I.2914.2021 of the Mayor of Łódź of 15 November 2021 approving the building project and granting Veolia Nowa Energia Sp. z o.o., 5 Jadzia Andrzejewska, 92-550 Łódź, a building permit for the construction of the Thermal Waste Conversion Installation on the premises of the Thermal Power Station No. 4 of Veolia Energia Łódź SA at J. Andrzejewska Street in Łódź.
- ⁵⁹ at the electronic address: <https://nowaenergjadla.lodz.pl/zaklad-odzysku-energii-z-pozwoleniem-na-budowe>
- ⁶⁰ at the electronic address: <https://wykaz.ekoport.pl/>
- ⁶¹ Decision of the Mayor of Łódź No. DPRG-UA-I.2175.2023 of 27 November 2023.
- ⁶² at the electronic address: https://bip.uml.lodz.pl/uploads/tx_edgeregals/268750/8419/UA_decyzja_DPRG-UA-I-2175-2023_20231128.pdf). UML does not maintain a public archive of announcements in the BIP, therefore the date of this announcement cannot be determined.
- ⁶³ UML does not maintain a public archive of announcements in the BIP and therefore the date of these announcements cannot be determined.
- ⁶⁴ the study report is available at the following electronic address: <https://slideplayer.pl/slide/440106/>
- ⁶⁵ selected publications available at: <https://nowaenergjadla.lodz.pl/ERF-TWCF/media-o-ERF>
- ⁶⁶ at the electronic address: <https://nowaenergjadla.lodz.pl/ERF-TWCF/czym-jest-ERF>
- ⁶⁷ at the electronic address: <https://www.facebook.com/NowaEnergiaDlaLodzi/>
- ⁶⁸ at the electronic address: <https://nowaenergjadla.lodz.pl/ERF-TWCF/czym-jest-ERF>
- ⁶⁹ at the electronic address: <https://nowaenergjadla.lodz.pl/zawiadomienie>
- ⁷⁰ at the electronic address: <https://nowaenergjadla.lodz.pl/obwieszczenie>
- ⁷¹ at the electronic address: <https://nowaenergjadla.lodz.pl/list-do-mieszkanow-lodzi>
- ⁷² at the electronic address: <https://nowaenergjadla.lodz.pl/ERF-TWCF/broszura-informacyjna>
- ⁷³ at the electronic address: <https://nowaenergjadla.lodz.pl/ERF-TWCF/faq>
- ⁷⁴ selected publications available at: <https://nowaenergjadla.lodz.pl/ERF-TWCF/media-o-ERF>
- ⁷⁵ K. Szkopiecka et al, Raport o sytuacji społeczno-gospodarczej województwa łódzkiego 2024, Urząd Statystyczny w Łodzi, Łódź 2024, p. 134.
- ⁷⁶ I. Świącicki, Niernównomierna jakość dostępu do Internetu w Polsce w dobie pandemii COVID-19, Polski Instytut Ekonomiczny, Warsaw 2021, p. 19.
- ⁷⁷ According to ESP 2019, the term "vulnerable persons" means: "persons or groups of persons who may be more likely than others to be adversely affected by a project on the basis of characteristics such as gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, young people and the elderly), physical or mental disability, literacy, political opinion or social status". Vulnerable persons and/or groups may also include, inter alia, vulnerable persons such as those living below the poverty line, those who do not own land, single-person households, natural resource-dependent communities, migrant workers, refugees, internally displaced persons or other displaced persons who may not be protected under national legislation and/or public international law." (ESP 2019, Part II: definitions).
- ⁷⁸ including at the following electronic addresses: <https://www.veolia.pl/o-nas/przetargi> and <https://www.veolia.pl/platforma-zakupowa>
- ⁷⁹ at the electronic address: <https://nowaenergjadla.lodz.pl/ERF-TWCF/>
- ⁸⁰ at the electronic address: <https://www.ebrd.com/ipam>
- ⁸¹ at the electronic address: ipam@ebrd.com
- ⁸² at the electronic address: sygnalista@veolia.com
- ⁸³ at the electronic address: <https://veolia.whispli.com/tiers-ethique?locale=pl>
- ⁸⁴ entrepreneur registered in the Central Business Register and Information on Business Activity with NIP number 5212745121
- ⁸⁵ Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU with regard to corporate sustainability reporting (text with EEA relevance) (Official Journal of the EU 16.12.2022, L 322/15)