



Fengmiao I Supplementary Lenders Information Package Documentation

Non-Technical Summary

Fengmiao Wind Power Co Ltd Preparatory Office

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Acronyms

ABC	Anti-bribery and Corruption
AoI	Area of Influence
BAP	Biodiversity Action Plan
BEIA	Biodiversity and Ecosystem Impact Assessment
CCRA	Climate Change Risk Assessment
CHA	Critical Habitats Assessment
CIA	Cumulative Impact Assessment
CoC	Code of Conduct
EA	Energy Administration
EAAA	Ecologically Appropriate Area of Analysis
EIA	Environmental Impact Assessment
EMF	Electromagnetic field
EP4	Equator Principles 4
ESG	Environmental, Social and Governance
ESMP	Environmental and Social Management Plan
ESR-IA	Ecosystem Services Review Impact Assessment
ESS	Ecosystem Services
E&S	Environmental and social
FLRP	Fisheries Livelihood and Restoration Plan
FM1	Fengmiao I Offshore Wind Farm
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
HDD	Horizontal Directional Drilling
HRRA	Human Right Risk Assessment
IBAT	Integrated Biodiversity Assessment Tool
IFC	International Finance Corporation
IFC GN	International Finance Corporation's Guidance Note
IFC PS	International Finance Corporation's Performance Standards
LESA	Lender's Environmental and Social Advisors
LMP	Labour Management Plan
MoEA	Ministry of Economic Affairs

MOENV	Ministry of Environment
NGOs	Non-Governmental Organisations
NTS	Non-technical Summary
OHS	Occupational health and safety
PAP	Project Affected People
QHSE	Quality, Health, Safety and Environment
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SLIP	Supplementary Lender's Information Package
TFA	Taichung Fishermen's Association
TWD	Taiwanese White Dolphin
VECs	Value Environmental Components
WHDP	Wildlife Habitat Development Plan
WRI	World Resources Institute
WTGs	Wind Turbine Generators

1. Introduction

1.1 Purpose

The Fengmiao Wind Power Co Ltd Preparatory Office (FM Preparatory Office) is seeking project finance for its offshore wind farm – the Fengmiao I Project (the FM1 Project or the Project). This Non-Technical Summary (NTS) summarised the key findings and conclusions of the environmental and social assessments for the FM1 Project, which was awarded 500MW capacity located in the west coast of Taiwan. The project's Environmental Impact Assessment, undertaken under the Environmental Impact Assessment Act (2023, as amended) was used as the foundation, in terms of data collection and assessment, to further develop a suite of documents aligned to Good International Industry Practice (GIIP). In this NTS, the rationales and results of undertaking environmental and social impact assessments are presented, with mitigation measures being proposed.

1.2 Taiwanese Legislative Framework

The FM1 Project has been subject to the Taiwanese EIA permitting process and is obligated to follow the relevant guidance for baseline data collection and impact simulation. In the local EIA context, a number of different authorities were involved throughout the permitting process, including the Ministry of Environment (MOENV), Energy Administration (EA), Ministry of Economic Affairs (MoEA), local governments and other government agencies. The Project has successfully obtained the EIA approval by the EA and then by the MOENV on 30th June 2023.

The EIA of FM1 Project adheres to the following environmental and social related legislations, and guidance documents:

- Environmental Impact Assessment Act (2023)
- Wetland Conservation Act (2013)¹
- Act on Wildlife Conservation (2013)
- Coastal Zone Management Act (2015)
- Fisheries Act (2018)
- Underwater Cultural Heritage Preservation Act (2022)
- Air Pollution Control Act (2018)
- Water Pollution Control Act (2018)
- Soil and Groundwater Pollution Remediation Act (2010)
- Marine Pollution Control Act (2023)
- Noise Control Act (2021)
- Waste Disposal Act (2017)
- Climate Change Response Act (2023)
- Cultural Heritage Preservation Act (2023)
- Vibration Regulation Act, Japan (1976)
- Operational Regulations for Environmental Impact Assessments for Development Activities (2021)
- Regulations for the Management of Inventory and Registration of Greenhouse Gas Emissions (2023)
- Environmental Vibration Management Guidance (2022)
- Underwater Noise Guidance (2023)
- Guidance for Ecological Survey Methodology for Offshore Wind Development (2022)
- Guidelines for Limiting Exposure to Time-varying Electric, Magnetic and Electromagnetic fields (2020)
- Technical Specification for Animal Ecology Assessment (2011)

¹ The Wetland Conservation Act (2013) was reviewed, and it has been verified that FM1 does not overlap with wetlands of national importance.

- Technical Specification for Plants Ecology Assessment (2002)
- Technical Specifications for Marine Ecology Assessment (2007)
- 2011 Manuel of Taiwan Road Capacity (2011)
- Standard Investigation of the Impacts of Offshore Wind Turbines on the Marine Environment (StUK4) (2013)
- SN.1/Circ.296: "Degree of Risk Evaluation" by the International Maritime Organization (IMO) (2010)
- IALA Recommendation O-134 on the IALA Risk Management Tool for Ports and Restricted Waterways by the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) (2009)

1.3 International Compliance Requirements

The assessments submitted to gain EIA approval have been further developed to align with the international principles and Good International Industry Practice (GIIP) standards, including:

- Equator Principles IV (2020)
- International Finance Corporation's (IFC) Performance Standards (PS) (2012)
- World Bank Group Environmental Health and Safety Guidelines (2007)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023)
- OECD Recommendations of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (The "Common Approaches") (2024)

This involved the production of the following package of documents termed as Supplementary Lender's Information Package (SLIP):

- Scoping Report
- Biodiversity and Ecosystem Impact Assessment (BEIA);
- Critical Habitats Assessment (CHA);
- Cumulative Impact Assessment (CIA);
- Ecosystem Services Review Impact Assessment (ESR-IA);
- Biodiversity Action Plan (BAP);
- Fisheries Livelihood and Restoration Plan (FLRP);
- Climate Change Risk Assessment (CCRA)
- Human Rights Risk Assessment (HRRRA)
- Social Impact Assessment (SIA); and
- Non-technical Summary (NTS).

The assessments and plans listed above have been prepared to develop the environmental assessment work undertaken to date with reference to the following guidance notes and good practices handbooks:

- Equator Principles Association Best Practice Guidance Notes:
 - On Environmental and Social Impact Assessment Scope of Work (2022)
 - On Climate Change Risk Assessment (2023)
 - On Biodiversity Baseline Surveys (2022)
- IFC Good Practice Handbooks
 - Guidance Note 1 Assessment and Management of Environmental and Social Risks and Impacts (2021)
 - Land Acquisition and Involuntary Resettlement (2023)
 - Guidance Note 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (2019)

- Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013)
- Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)
- World Resources Institute
 - Weaving Ecosystem Services into Impact Assessment A Step-by-Step Method (2013)

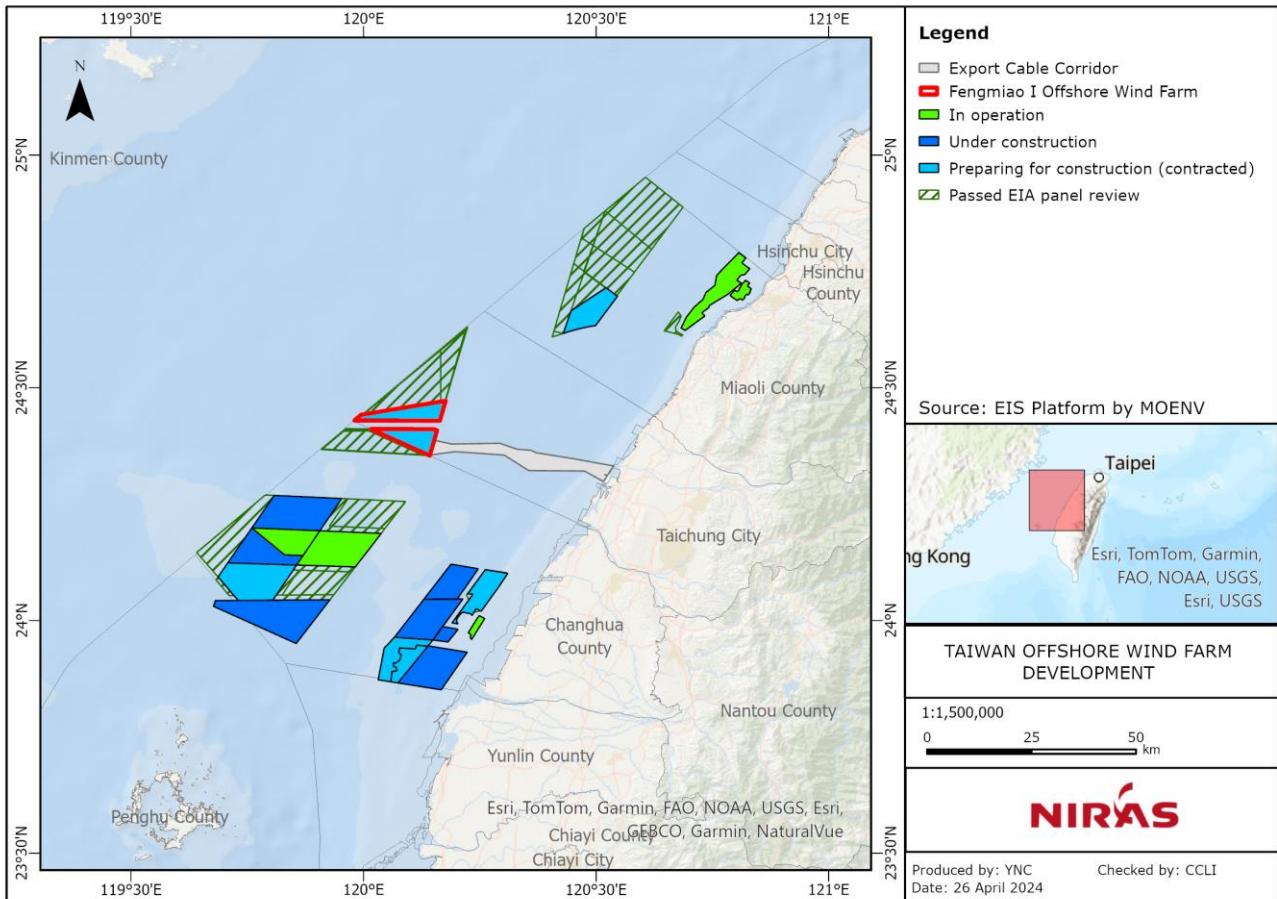
2. Project Description

Offshore wind energy is a key component in the promotion of Taiwan's renewable energy policies. The FM Preparatory Office has successfully acquired the right to build 500 MW of capacity from a proposed total installed capacity of 1,800 MW in the Fengmiao EIA in 2022. The project with 500MW awarded capacity is the Fengmiao I Project (the FM1 Project or the Project)

2.1 Site Information

The FM1 Project is location off the west coast of Taiwan and situated within one of the windiest regions in Taiwan Strait. According to the EIA, the average wind speed recorded at the Wuqi Station nearest to the Project is 4.45 m/s, from a northerly prevailing wind direction. During the summer season there is shift in prevailing condition to the South-East with lower average wind speed.

The FM1 wind farm area is approximately 99.94 km² with water depth ranging from 52 to 64m and the closest distance from shore is approximately 35 km. The EIA comments that the seabed layers in the project area is more than 80 m thick, composed of silty sand, silt, clayey silt and clay. Nearby offshore wind farms, which are in various development stages, are highlighted in Figure 2.1.



Note the wind farms' development statuses are presented at the time of writing (26th April 2024).

Figure 2.1: The location of FM1 Project Sites offshore of Taichung City on the West coast of Taiwan

2.2 Development Timeline

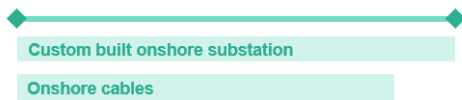
- The expected schedule of project construction is noted in Table 2.1 and Figure 2.2:
- 2025~2026: commencement of onshore construction, including substation and onshore cables.
- 2025~2027: commencement of offshore construction, including the construction for the cable landing from sea to shore (Horizontal Directional Drilling, HDD), WTGs, foundations, offshore substation and sub-marine cables.
- 2027: scheduled operation time.

Table 2.1: Schedule of Project Construction for the FM1 Project

Area	Components	Construction Schedule
Onshore	Custom built onshore substation	• Jan 2025~Jun 2026
	Onshore cables	• Jan 2025~May 2026
Offshore	WTGs	• Jun 2027 ~Oct 2027
	Foundation	• Mar 2026~Jun 2026 (Pin Pile) • Mar 2027~Jun 2027 (Jacket)
	Offshore substations	• Jul 2026~Dec 2026
	Subsea cables	• May 2025~Sep 2025 (HDD) • Apr 2026~Aug 2026 (Export cables) • Apr 2027~Jul 2027 (Inter-array cables)

Onshore Construction

Jan 2025~Jun 2026



Operation
2027~



Offshore Construction

May 2025~Oct 2027

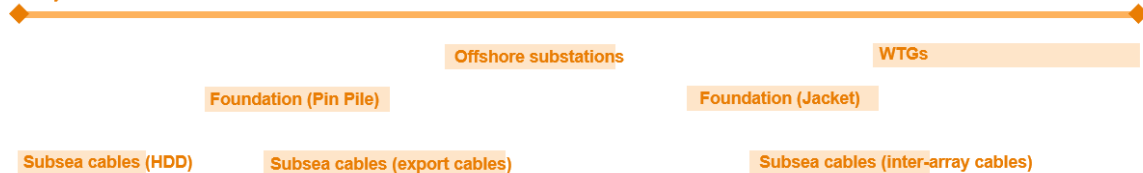


Figure 2.2: The FM1 Project's Development Timeline

3. Description of Baseline

Primary and secondary baseline data as noted in the Project's EIA are adopted to form the foundation for the SLIP assessments.

3.1 Environmental Baseline

The summary of the environmental baseline conditions is provided in Appendix AAppendix A – Summary of EIA Baseline Data. Details of the environmental baseline surveys conducted are available in the EIA published online (source: <https://eiadoc.moeenv.gov.tw/eiaweb/11.aspx?hcode=1110141A&srctype=0>)

In addition to the EIA, the following sources are also used in the SLIP:

- Wildlife Habitat Development Plan (WHDP) report (Fengmiao Wind Power Co Ltd Preparatory Office, 2024).
- Integrated Biodiversity Assessment Tool (IBAT) (ibat-alliance, 2024)
- Boat-based seabird survey data from overlapped development projects (Hai-an Wind Power Co Ltd (preparatory office), 2023) and (Lai-chung Wind Power Co Ltd (preparatory office), 2023).

The environmental baseline data of the Project and its surrounding areas were collected in compliance with the national standards and regulations as noted in Section 1.2.

3.2 Social Baseline

Details of the social baseline surveys conducted are available in the EIA published online (source: <https://eiadoc.moeenv.gov.tw/eiaweb/11.aspx?hcode=1110141A&srctype=0>). Investigated social components in the EIA include:

- Physio-chemical conditions (air/water/soil quality, noise and vibration, EMF)
- Socio-economics condition
- Fisheries resources
- Land use
- Infrastructure and facility
- Tourism
- Traffic and transportation
- Cultural assets
- Landscape and visual impact
- Health and safety
- Public awareness

The majority of impacts to social receptors have been assessed under the EIA framework via the application of associated guidelines except the following:

- Socio-economics of fisheries
- Community health and safety
- Occupational health and safety
- Employment
- Labour and working conditions

The EIA provides limited consideration of impacts on the above topics. These components are further discussed and assessed through the delivery of Fisheries Livelihood and Restoration Plan (FLRP), Human Right Risk Assessment (HRRRA) and Social Impact Assessment (SIA).

Socio-economics baseline data from the questionnaire conducted in the FLRP is summarised: annual household fishing income for participants ranged from 25,000 to 16,000,000 NTD, with the average yearly fishing income per household being 1,978,008 NTD. The mode (i.e., most frequent response) was between 2,100,000 to 3,000,000 NTD. On average, roughly 1 domestic crew member was reported per vessel, compared to 0.3 per vessel for foreign crew members. The average annual salary expenditure was \$469,091 NTD for domestic crew members and \$ 1,442,222 NTD for foreign crew members. The FLRP demonstrated that gillnet is the primary fishing method in Taichung, accounting for 53.5% of fishing methods. This was followed by angling gear at 38.4% and set net at 3.1%.

4. Key Environmental and Social Impacts Assessment

4.1 Overview

In line with the GIIP described in Section 1.3, the Project has undertaken standardised environmental and social impact assessments. The assessment process begins with the Scoping Report, informing the scopes and analysis in the BEIA, CHA, CIA, ESR-IA, CCRA, HRRRA, SIA and other implementation plans. The aims and the findings, including identified impacts and associated mitigation measures (as detailed in Appendix B – Summary of mitigation measures), for each SLIP assessment are summarised in this section.

4.2 Summary of Scoping Report

The aim of the scoping is to provide an evidence base for the undertaking of the SLIP documentation (as outlined in Section 4.3~4.9) in line with GIIP and to consider the applicability/value of the underlining data to support their production. The assessments underpinning the SLIP are based on the foundation provided by the data collected and in some cases the assessments presented by the EIA. The report provides recommendations for the scope of the SLIP. As such, it is a critical first step for the project to understand the provenance, quality and quantity of these underpinning datasets and assessments.

A review of previous documentation used by offshore wind projects in Taiwan seeking project finance from Equator Principle Financial Institutes was undertaken. The results of this review were displayed in a scoping matrix. This presented the topics and Value Environmental Components (VECs) that were reviewed in the SLIP in order to provide a thorough scoping rationale for the scoping of the SLIP. Topic scoped into the SLIP are summarised below and described in Section 4.3~4.8:

- Socio-economics for fisheries
- Socio-economics for community health and safety, occupational health and safety, employment, labour and working conditions
- Climate change/GHG emissions
- Ecology for marine mammals, marine reptiles, benthic ecology, fish and birds
- Cumulative impacts for birds, marine mammals, marine reptiles, fish (elasmobranchs)

Topics that were scoped out of the SLIP include:

- Social components for air quality, noise and vibration, hydrology, soil and geology, water, EMF, seascape, landscape and visual impacts, tourism, traffic, shipping and navigation, cultural heritage, and infrastructure and service. These topics were scoped out since impacts from the project have been assessed under

the EIA framework via the application of associated national/international guidelines. The impacts are reported to be either not significant or through the application of mitigation measures it has been determined that the project will not present significant impacts to noted VECs. The delivery of these mitigation measures will be managed through the project's ESMS and management plans. Continuing stakeholder engagement will be planned through the Stakeholder Engagement Plan and grievances will be managed via an appropriate mechanism. In addition, mitigation measures will be noted through SLIP assessments as applicable to specific assessment and will also be managed through the project's ESMS. As such, it is considered that these topics have been reviewed in line with the objectives noted in PS1 and will therefore not be further assessed in the SLIP.

- Terrestrial ecology was scoped out as the scale of development is minor and the percentage of natural habitats within the onshore landfall areas is low. The onshore cables will be mainly developed along the existing roads. The EIA records limited and temporal impacts to species recorded by the project's EIA.
- The Social Impact Assessment (SIA) was recommended to be scoped out of the SLIP as the impacts have been appropriately considered through the EIA framework and mitigation measures/management plans will be applied via the project's ESMP. The impacts described by the SIA were generally considered to be low risk for an offshore windfarm and the reported 'high impact significance' (community safety, fisheries livelihood) topics were assessed via HRRRA and FLRP. However, in line of international advocacy for sustainable development, the Project conducted an independent Social Impact Assessment to undertake a systematic assessment to identify and evaluate the Project's social risk and impact. Furthermore, the assessment follows a mitigation hierarchy, to develop relevant measures that aim avoid, minimize and where residual impacts remain, to compensate or offset for impacts to affected people, including workers and affected communities.

In summary, the Scoping Report provided an evidence based to support the production of the following assessments: BEIA, CHA, CIA, ESR-IA, CCRA, HRRRA, SIA and plans: BAP, FLRP, LMP and Environmental and Social Management Plan (ESMP) into the SLIP.

4.3 Summary of Biodiversity and Ecosystem Impact Assessment (BEIA)

The objective of this assessment is to re-evaluate the impacts to biological receptors in the EIA, under standardised EIA framework to report the significance of the impact pre and post-implementation of mitigation measures. Mitigation measures were noted from the EIA, and where absent or considered not to follow Good International Industry Practice (GIIP), additional measures were recommended. The assessment further considered the results of the critical habitats screening exercise. Critical habitats identified from the screening were assessed in direct reference to the requirements set out in the IFC Performance Standard 6 (PS6) (2012) and associated Guidance Note 6 (GN6) (2019) with impacts prior to mitigation measures and residual impacts identified. The assessment demonstrated, where possible, no-net loss and provided recommendation for net biodiversity gains to the critical habitats. This assessment provided a foundation for completing the CIA and BAP.

The BEIA concluded the following impacts as insignificant for different receptors:

- Changes in seabed morphology and substrate (benthic community and fish)
- Increase in suspended sediment concentration (benthic community and fish)
- Increased underwater noise due to piling (at Taiwanese White Dolphin (TWD) Major Wildlife Habitat and for fish and benthic communities)
- Disturbance of the intertidal ecosystem (shorebirds and intertidal benthos)
- Low frequency underwater noise (marine mammals and fish)
- Collision (regularly occurring seabirds, migratory raptors and migratory waterbirds; offshore bats)
- EMF (elasmobranchs)

The BEIA updated the EIA with a rationale to scope out the following ornithological impacts as there was no record of an impact scoping exercise to discount these standard impact pathways in the EIA:

- Displacement and disturbance
- Barrier effect
- Indirect effect through the loss of prey and habitats
- Pollution

The BEIA concluded the following impacts as significant before mitigation, and concluded insignificant residual impacts after mitigation:

- Increased underwater noise due to piling (PTS/TTS²/disturbance for all marine mammals; marine reptiles)
- Increased underwater noise and collision risk due to increased marine traffic (marine mammals and marine reptiles)
- Displacement of fisheries (marine mammals, marine reptiles and fish)

4.4 Summary of Critical Habitat Assessment (CHA)

As per IFC PS6 (2012) a CHA is required to demonstrate no-net loss to critical habitats screened into the assessment as a result of the implementation of the project. Where there is determined to be a loss of biodiversity value, the Project is required to provide an analysis of the compensation requirements to achieve net-gain for critical habitats.

In the CHA, expert judgement from an experienced marine biologist, an environmental specialist and an ornithologist was utilised to help the assessment process. Firstly, Ecologically Appropriate Area of Analysis (EAAA) were conducted for different groups of species. EAAA was conducted not only considering species' ecological patterns, processes, features and functions as outlined in the IFC GN6, but also the project's influence on them (i.e. species' interaction with the project's Aol). The threatened species and restricted range species in the EAAAs were then identified through the application of the IBAT (IBAT-Alliance, 2019). Lastly, a screening process was applied to identify critical habitats for marine mammals, marine reptiles, fish, bats and birds under the criteria outlined in IFC GN6 (2019). The following species were those whose EAAAs were likely to interact with the Project Aol, which were taken forward into critical habitat assessment :

1. **Marine mammals:** Taiwanese white dolphin (*Sousa chinensis taiwanensis*) and East Asian finless porpoise (*Neophocaena asiaorientalis sunameri*)
2. **Elasmobranch fish species:** Blackspotted catshark (*Halaelurus buergeri*), bottlenose wedgefish (*Rhynchobatus australiae*), brown guitarfish (*Rhinobatos schlegelii*), giant guitarfish (*Glaucostegus typus*), green sawfish (*Pristis zijsron*), narrow sawfish (*Anoxypristis cuspidate*), smoothnose wedgefish (*Rhynchobatus laevis*) and Taiwanese wedgefish (*Rhynchobatus immaculatus*)
3. **Birds:** Black-faced spoonbill (*Platalea minor*)

The critical habitats assessment noted no-net-loss to critical habitat screened into the assessment and proposed potential opportunities for net biodiversity gains. This assessment has demonstrated that construction of the wind farm will result in insignificant residual impacts to Taiwanese white dolphin, East Asian finless porpoise, elasmobranchs and black-faced spoonbill, and therefore no-net-loss to their associated critical habitats.

² PTS (Permanent Threshold Shift) and TTS (Temporary Threshold Shift) are the most common auditory effects on receptors resulting from acute or chronic exposure to high-intensity acoustic stimulation.

The potential net biodiversity gain approach were proposed in the CHA as well as the BAP, which can be updated through the associated implementation plan.

4.5 Summary of Cumulative Impact Assessment (CIA)

The objective of CIA is to identify the receptors and relevant development or drivers that potentially cause cumulative impacts to receptors.

The CIA has undertaken a scoping process to identify the Valued Environmental and Social Components (VECs) to be considered in the cumulative impact assessment. The spatial and temporal boundaries in which activities and environmental drivers potentially contribute to impacts cumulatively were also defined.

The CIA focused on the impact drivers for which a significant effect to the VECs or receptor was rated before mitigation, referencing from the impact assessment results in the BEIA.

Impacts recorded as significant before mitigations in the BEIA's assessments are carried forward into the CIA assessment. The report concluded insignificant or minor residual impact following the implementation of proposed mitigation measures:

- Underwater noise from hydraulic driving
- Increased marine traffic and associated underwater noise
- Displacement of fisheries
- Collision risk to birds

4.6 Summary of Ecosystem Services Review Impact Assessment (ESR-IA)

Ecosystem Services (ESS) are the benefits that people, including businesses, derive from ecosystems as defined in IFC PS6 (2012). An Ecosystem Services Review for Impact Assessment (ESR-IA) has been conducted for the Project based on a six step method outlined by the World Resources Institute (WRI) guidance: Weaving Ecosystem Services into Impact Assessment (2019). This assessment of ESS is required by the IFC PS6, specifically to demonstrate maintenance of the benefits from ESS.

The ESR-IA identifies capture fisheries as the priority ecosystem service with the beneficiaries of professional fishermen from Taichung Fishermen's Association (TFA). Potential impacts on this priority ecosystem service supply include loss of physical area, disruption of/reduced access to fishing grounds, increased travel time and increased input requirements. These impacts vary during different stages of the Project's lifecycle and potentially resulting in the loss of income for TFA's members. Over the life-cycle of the Project, the impacts to TFA's members are considered to be moderate during operation and major during construction.

Mitigation strategies for the impacts on fishery ESS are further addressed in the FLRP.

4.7 Summary of Climate Change Risk Assessment (CCRA)

The objective of this CCRA report is to provide a high-level climate-related information and assessment in making climate-resilient decisions for the Project that is in line with Equator Principles 4 (EP4) (2020). This report follows the recommendations of the Equator Principles Guidance Note on Climate Change Risk Assessment (2023) which consists of the following steps:

- GHG emission assessment;
- Preliminary compatibility review;
- Climate risk screening;
- Climate scenario analysis;

- Climate risk assessment and management.

The GHG emission assessment concluded that the GHG emissions of the Project are unlikely to exceed 100ktpa CO₂e in either the construction or operational phases. Therefore, transition CCRA and GHG alternative analysis were not required according to the Guidance Note. For the preliminary compatibility review, it concluded that the Project is compatible with the national and international climate targets.

The CCRA has considered potential physical risks under climate change scenarios and different time horizons to determine the resilience of the infrastructure to change. The following physical climate risks were identified for the Project: (1) extreme heat events, (2) extreme cold events, (3) extreme precipitation events, (4) flood, (5) extreme wind events and (6) High waves. The significance, vulnerability and materiality of the identified risks were assessed.

The assessment indicated that the risks posed by climate hazards, exacerbated by climate change, range from low to moderate. No significant damage, large scale or long-term of impact is expected, resulting in no significant financial loss.

The CCRA provided diverse recommendations to manage the climate risks. For example, higher safety standards in design work to minimise the offshore operational risks; drainage maintenance and runoff monitoring to protect onshore facilities, which are likely to encounter flooding.

4.8 Summary of Human Right Risk Assessment (HRRR)

The Human Rights Impact Screening report aims to identify and assess potential human rights risks associated with the Fengmiao Offshore Wind Farm Project. The methodology references the EP Guidance Note on Implementation of Human Rights Assessment and several international guidelines, considering Taiwan's social context, the energy industry's nature, the social area of influence, and the legal and institutional framework.

The report includes stakeholder analysis and risk assessment through questionnaire surveys and interviews for workers and suppliers, and desk reviews for community impact. Assessment factors include severity (scale, scope, remediability) and likelihood of human rights risks. The results identified three key stakeholders: workers of suppliers, workers of CIP and network companies, and the community. These stakeholders face varied priorities, consolidated into five major human rights issues: forced labor, occupational health and safety (OHS), right to health, right to life and security of person, and working conditions.

Workers of suppliers face higher risks related to OHS, the right to health, and the right to life and security of person. Similarly, workers of CIP and network companies also face high OHS risks due to shared working areas with suppliers. Additionally, these workers identify forced labor and working conditions as high-risk issues. Communities classify OHS, the right to health, and the right to life and security of person as high risks.

Following the identification of risks for different stakeholders, the report inventories mitigation actions, commitments to remedy, and grievance mechanisms. The gaps in management procedures are identified and integrated into further improvement plans. This assessment lays the foundation for developing a comprehensive human rights due diligence process for the Fengmiao Offshore Wind Farm Project, ensuring alignment with international human rights standards.

4.9 Summary of Social Impact Assessment (SIA)

In line with international efforts to promote sustainable development, Social Impact Assessment conducts a comprehensive assessment to identify and evaluate the Project's social risks and impacts on affected communities and workers and develop relevant mitigation measures.

The impacts primarily result from onshore and offshore activities during the construction and decommissioning phases. The impact mapping process identifies 23 types of impact, which can be summed up into 4 categories: "Impact on Community Health, Safety, and Security", "Socio-Economic Impact", "Impact on Infrastructure Service", and "Impact on Labor and Working Conditions". Six social groups are considered to be prone to identified impact, including local fishermen, local communities, local businesses, project workforce, infrastructure service providers, and other businesses.

The negative impact on fishery livelihood is highly significant and is anticipated to last throughout the Project's life cycle. Compensation funding is planned to mitigate and compensate for the income losses, and a variety of fishery revitalization initiatives are further proposed to facilitate alternative livelihood opportunities for affected fishermen.

In addition, attention is required to the impact on the Project workforce. The primary sources of risk are associated with the violation of migrant workers' rights and an unsafe and unhealthy working environment. The Project's policy guidelines and ethical practices are in place to serve as mitigation measures, and they will be complied with by the Project, its suppliers, and its contractors.

Potential positive benefits are also noted in the report. There is a growing interest in integrating wind farm projects with local tourism, according to practical findings. The potential tourism activities may include marine tourism, environmental education, etc. Furthermore, derived economic benefits of the Project are foreseeable as the priority will be given to hiring local manpower and subcontractors to participate in project activities where suitable.

For negative impacts with low significance, grievance mechanisms and stakeholder engagement will be in place to manage unexpected incidents.

The Social Impact Assessment presents a thorough social impact assessment for the Project. It outlines the potential social risks on local communities and businesses, with the primary concern being the impact on fishery livelihood, followed by the risk of workers' rights violations. Mitigation measures have been proposed and planned based on the significance of the impacts.

4.10 Summary of Labour Management Plan (LMP)

The Labour Management Plan (LMP) for the Fengmiao Offshore Wind Project outlines measures to manage labour risks in line with Taiwan's legal framework and the World Bank's Environmental and Social Standards (ESS2 and ESS4). It ensures compliance with national and international standards to address labour conditions and community health and safety risks identified during the project's Environmental and Social Assessment.

The LMP applies to all workers, including direct employees, contracted workers, and primary supply workers. It establishes key provisions such as legal registration of workers, record-keeping of employment details, and a robust grievance mechanism.

Labour Use and Employment Requirements : The project anticipates a diverse workforce, including local and international workers, with recruitment and labour needs varying across project phases. The LMP promotes equality and non-discrimination in hiring and remuneration, prohibits forced and child labour, and ensures compliance with Taiwan's Labour Standard Act for working hours and overtime compensation.

Health and Safety Measures : The plan prioritizes workplace safety through the implementation of a Health and Safety Management Plan, provision of PPE, first aid facilities, and procedures for accident reporting and record-keeping. Contractors are required to ensure the safety and welfare of all workers, with strict adherence to Taiwan's safety regulations.

Policies and Grievance Mechanisms : The Code of Conduct (CoC) sets ethical expectations for all project stakeholders, aligned with ESG principles and legal obligations. A Respectful Workplace Policy ensures a safe and inclusive environment, addressing issues such as discrimination and harassment. The grievance mechanism provides accessible channels for raising concerns, ensuring timely resolution without retaliation.

The LMP provides a comprehensive framework to safeguard workers' rights, promote fair labour practices, and ensure alignment with international standards during the construction and operation of the Fengmiao Offshore Wind Project.

4.11 Identified Impacts and Mitigation Measures

The identified impacts, receptors, results of the above impact assessments and summary of associated mitigation measures and net biodiversity gain approach are summarised in Table 4.1. Detailed mitigation measures can be found in Appendix B Appendix B – Summary of mitigation measures.

Table 4.1: Summary of key environmental impacts

Identified impact	Receptor	Impact before mitigation	Summary of mitigation measures	Residual impact ³ / net loss	Proposed net biodiversity gain approach	Applicable assessment
Construction phase – installation activities associated with turbines foundations and cable installation						
Changes in seabed morphology and substrate	Benthic communities, fish (elasmobranchs)	Insignificant	Only one foundation pile driving operation at any given time.	<ul style="list-style-type: none">• <u>No residual impact</u>• <u>No net loss</u>	<ul style="list-style-type: none">• Education programme• Monitoring programmes	BEIA, CHA, BAP
Increase in suspended sediment concentration	Benthic communities, fish (elasmobranchs)	Insignificant	<ul style="list-style-type: none">• Only one foundation pile driving operation at any given time.• Silt curtain for the construction near-shore.	<ul style="list-style-type: none">• <u>No residual impact</u>• <u>No net loss</u>		BEIA, CHA, BAP
Introduction of invasive Species	Fish (elasmobranchs)	Insignificant	<ul style="list-style-type: none">• n/a	<ul style="list-style-type: none">• <u>No residual impact</u>• <u>No net loss</u>	<ul style="list-style-type: none">• Education programme• Monitoring programmes	BEIA, CHA, BAP
Construction phase – hydraulic piling of the turbine foundations						
Increased underwater noise	Marine mammals, marine reptiles, fish, benthic communities	<ul style="list-style-type: none">• Significant (disturbance to marine mammals; marine reptiles)• Insignificant (fish; benthic communities; disturbance at Taiwanese White Dolphin (TWD) Major Wildlife Habitat)	<ul style="list-style-type: none">• Strict piling operation protocols with noise control methods.• Vessel speed control• Warning mechanism and contingency plan for cetacean activities and underwater noise	<ul style="list-style-type: none">• <u>Insignificant residual impact</u>• <u>No net loss for TWD and East Asian finless porpoise</u>	<ul style="list-style-type: none">• Support for cetacean and marine reptiles rescue programmes• Marine mammal and reptile awareness raising• Education programme• Monitoring programmes	BEIA, CHA, CIA, BAP
Construction phase – landing of the export cable						
Disturbance of the intertidal ecosystem	Shorebirds, intertidal benthos	Insignificant	<ul style="list-style-type: none">• Underground construction methods and silt curtain (if applicable) in the intertidal zone• Waste management and staff education.	<ul style="list-style-type: none">• <u>No residual impact</u>• <u>No net loss</u>	n/a	BEIA

³ Where impacts prior to mitigation are deemed significant, an additional step in the assessment process will be applied to determine the residual significance of the impact after the successful implementation of mitigation measures. Conversely, where impacts are deemed insignificant before mitigation, no residual impact will remain.

Identified impact	Receptor	Impact before mitigation	Summary of mitigation measures	Residual impact ³ / net loss	Proposed net biodiversity gain approach	Applicable assessment
Construction phase – increased marine traffic						
Increase under-water noise; collision	Marine mammals, marine reptiles	Significant	Speed control and cetacean observation on the construction vessel.	<ul style="list-style-type: none"> • <u>Insignificant residual impact</u> • <u>No net loss</u> for TWD and East Asian finless porpoise 	<ul style="list-style-type: none"> • Support for cetacean and marine reptiles rescue programmes • Marine mammal and marine reptiles awareness raising • Education programme • Monitoring programmes 	BEIA, CHA, CIA, BAP
Operation phase – operation/presence of wind turbines						
Low frequency underwater noise	Marine mammals, marine reptiles, fish	Insignificant	n/a	<ul style="list-style-type: none"> • <u>No residual impact</u> • <u>No net loss</u> 	<ul style="list-style-type: none"> • Support for cetacean and marine reptiles rescue programmes • Marine mammal and marine reptiles awareness raising • Education programme • Monitoring programmes 	BEIA, CHA, BAP
Collision	Regularly occurring seabirds, migratory raptors and migratory waterbird; off-shore bats	Species dependent (minor or moderate to black-faced spoonbill)	Spaces for bird passage corridors are reserved.	<ul style="list-style-type: none"> • <u>Negligible or minor residual impact for birds</u> • <u>No residual impact for offshore bats</u> • <u>No net loss</u> for black-faced spoonbill 	<ul style="list-style-type: none"> • Research funding in black-faced spoonbill disease identification and control. • Collaborate with fishermen for eco-friendly aquaculture • Research funding in habitat restoration opportunities 	BEIA, CHA, CIA, BAP
Displacement of fisheries	Marine mammals, marine reptiles, fish	Significant	n/a	<ul style="list-style-type: none"> • <u>Insignificant residual impact</u> • <u>No net loss</u> for TWD and East Asian finless porpoise 	<ul style="list-style-type: none"> • Support for cetacean and marine reptiles rescue programmes • Marine mammal and marine reptiles awareness raising • Education programme • Monitoring programmes 	BEIA, CHA, CIA, BAP
Operation phase – operation of offshore cables						
EMF	Cartilaginous fishes such as sharks, stingrays, and eels	Insignificant	n/a	<ul style="list-style-type: none"> • <u>No residual impact</u> • <u>No net loss</u> 	<ul style="list-style-type: none"> • Education programme • Monitoring programmes 	BEIA, CHA, BAP

5. Environmental and Social Management Plan

5.1 Overview

An Environmental and Social Management Plan (ESMP) has been prepared to oversee all environmental and social tasks associated with the FM1 Project. The ESMP integrates processes and plans to manage environmental and social (E&S) commitments made under the local obligations of Taiwanese EIA and SLIP's recommendations in line with IFC PS1. The ESMP Framework outlines the environmental and social objectives and principles that guide the project towards achieving robust performance by minimizing identified E&S risks.

The FM1 Project's E&S team, with support from the contractors and suppliers, will be responsible for the management of E&S plans and mitigation measures. They will also conduct monitoring in accordance with our commitments throughout the FM1 Project lifecycle. It is worth noting that the FM Preparatory Office has established the preliminary E&S management organization as below as part of the ESMP. A summary of documents under the ESMP is provided in Appendix C – E&S Management Framework.

Organisation

HSE, Consents & Stakeholder Management Organisation

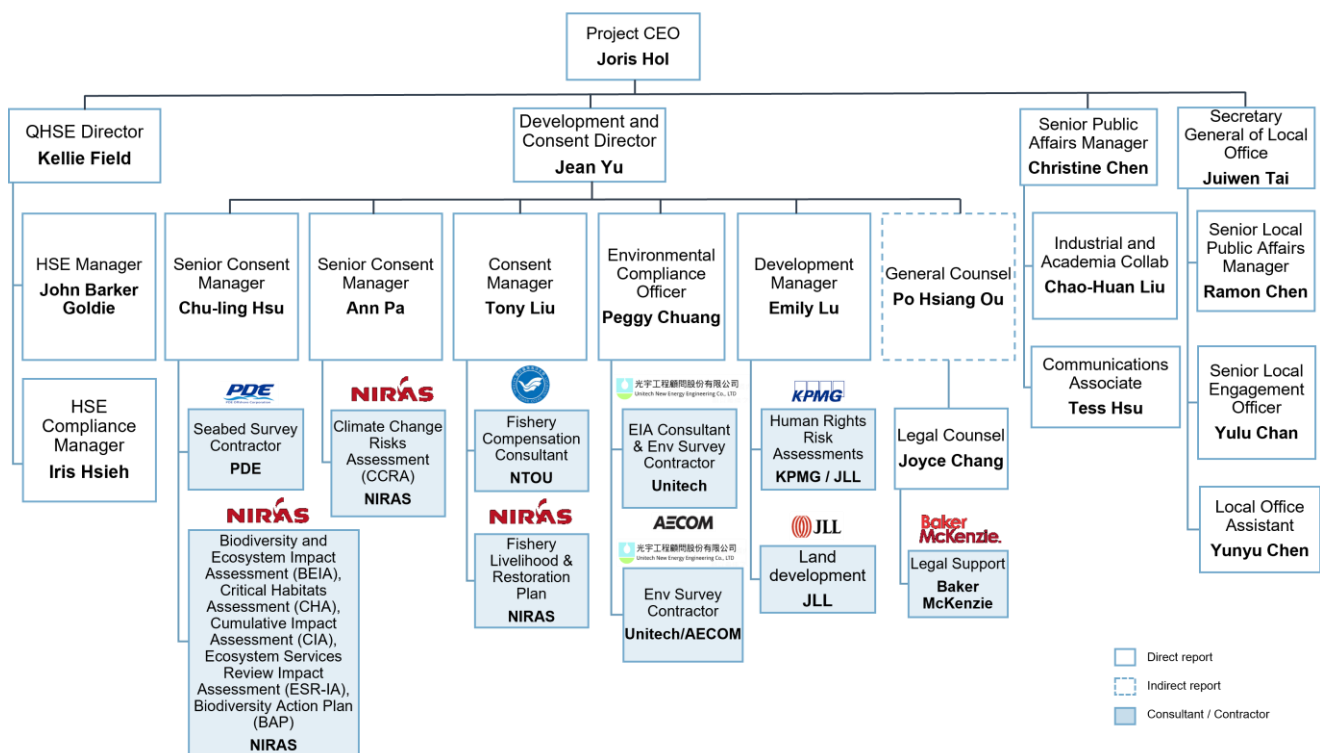


Figure 5.1: FM1 Environmental and Social Management Organization

5.2 HSE Management

5.2.1 QHSE team

The QHSE team shall provide dedicated resources and overview for each package of works as illustrated in the organisation chart below, in addition, each key site location will have fulltime HSE resource. All QHSE team members have 7-30 years HSE experience with 5-15 years working in offshore wind. All QHSE team members, including expatriates, have all worked in Taiwan previously and will be on their second or third Taiwanese wind farm, so they have a good understanding of the lessons learned, challenges and health and safety culture.

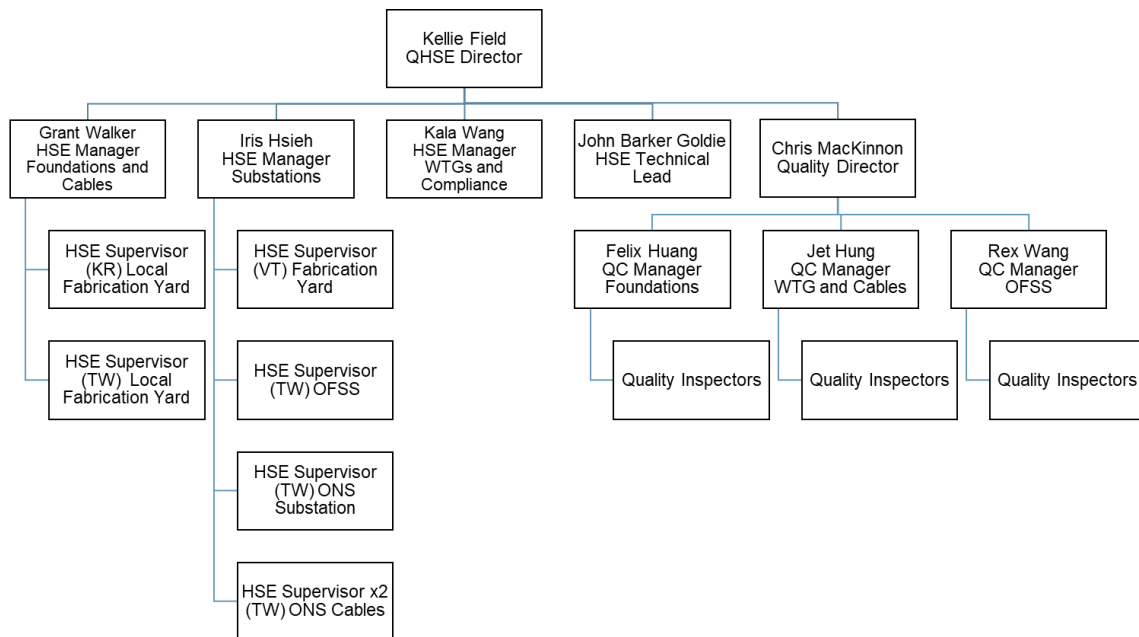


Figure 5.2: FM1 QHSE Team Organization Chart

5.2.2 HSE in Procurement

All tendering contractors who are contracted to the Project have been subject to HSE review and were required to complete the following processes:

- QHSE Questionnaire
- Environmental and Social Governance (ESG) Questionnaire
- Anti-bribery and Corruption (ABC) Questionnaire
- ESG screening via software packages, Refinitiv and RepRisk

All appointed contractors are required to agree to the following within the contract, which must be approved by the Project's QHSE Director and CIPs ESG Team:

- Employers Requirements for HSE
- ESG Clauses
- ESG Code of Conduct
- Cyber Security Requirements
- ESG Reporting Requirements – monthly and annual HSE and ESG performance reporting requirements

5.2.3 Management System Overview

The Project is preparing and implementing a HSE Management System which aligns to the ISO standards for health and safety and environment. The management system comprises of 5 levels:

- Policies
- Management Plans
- Procedures
- Forms and templates; and
- Monitoring and review

An internal audit schedule will be implemented to ensure that the system remains effective and overall HSE performance will be reviewed each month and quarter, with a management review held bi-annually. All documentation shall be reviewed bi-annually or annually in line with the QHSE Master Document Register. The QHSE Management System is maintained on the Project's document management system, PIMS.

5.2.4 Policies

The Project have implemented the policies listed below. The policies set out the key goals and objectives for the Project and shall be reviewed on a bi-annual basis, or following a significant change, whichever is soonest.

- Health and safety
- Environmental and social
- Quality
- Drug and alcohol
- Smoking

The policies have been signed and endorsed by the CEO and shared with the Project team and its contractors.

5.2.5 Management Plans and Procedures

The Project have implemented the Management Plans and Procedures.

The Management Plans set out how the Project will manage key topics: health and safety, environmental and social, community health, safety and security, emergency response, waste management and roles and responsibilities.

All Management Plans shall be reviewed on an annual basis, or following a significant change, whichever is soonest.

The Procedures set out the minimum standards and requirements for managing key risks and topics, including but not limited to: incident reporting and investigation, PPE, training, working at height, lifting operations, confined spaces, personnel transfers, hazardous materials, diving, communication and consultation, bunkering, dropped objects, HSE risk management, permit to work, stop work and adverse weather.

All Procedures shall be reviewed on an annual basis, or following a significant change, whichever is soonest.

5.3 Biodiversity Action Plan (BAP)

The function of the BAP is to provide a framework for the management of biodiversity (including ecosystem goods and services) within the Project. The plan facilitates compliance with the IFC PS6, including:

- the determination of management objectives and actions;
- roles, responsibilities and time-frames for implementation; and
- mechanisms for review and updating.

The actions identified in the BAP will be applicable to construction and/or operational phases. During construction, FM Preparatory Office will have principal responsibility for delivery of requirements, with the Project activities undertaken by the company. During operation, the FM Preparatory Office will have sole responsibility for delivery of requirements. Measures are planned which, individually and together, are expected to confer net biodiversity gains relevant to critical habitats and associated species.

The following measures are proposed to achieve biodiversity gain for the species identified in the CHA for marine mammals (Taiwanese white dolphin and East Asian finless porpoise) and fish (elasmobranch)⁴:

- [1] Support for cetacean rescue programmes
- [2] Marine mammal awareness raising
- [3] Education Programme
- [4] Monitoring- support for one or more local or regional monitoring programmes (including improving understanding of the white dolphin and finless porpoise's use of the critical habitats)

The following measures are proposed to achieve the goal of biodiversity gain for the species identified in the CHA for birds (black-faced spoonbill):

- [1] Research funding in black-faced spoonbill disease identification and control.
- [2] Collaborate with fishermen for eco-friendly aquaculture.
- [3] Research funding in habitat restoration opportunities.

The BAP is to be revised periodically to reflect new information and progress with implementation. Importantly, every revision must take into consideration current and future marine planning (such as life expectancy and operational boundaries) to ensure biodiversity is appropriately managed.

5.4 Fishery Livelihood Restoration Plan (FLRP)

The FM1 Project produced FLRPs in recognition of IFC PS5 (2012). This plan recorded a baseline socio-economic position of a representative sample of Project Affected People (PAPs) and noted potential effects as a result of the project implementation to the resource and the fishing activities of the affected population.

The PAPs were identified through discussions with the TFA, via publicly available data and consideration of the potential spatial overlap of project. The process considered coastal and offshore fisherman and their households registered with the TFA as PAPs, containing the vessel owners and crew members. Additional data should be sourced to determine the spatial extent of fisheries activities for coastal and offshore fisherman from other cities/counties, and whether this sub-group should be screened into the FLRP.

⁴ Same measures are applied to marine reptiles on a supplementary basis.

In order to provide necessary baseline information, a socio-economic survey was conducted for the identified PAP. Public data on Fisheries in Taichung, sourcing primarily from Fisheries statistical yearbook (Fisheries Agency, 2023), was referenced as a supplemental baseline information. Socio-economic data highlighted in this FLRP was used as a baseline for further project monitoring in the construction and operation phases.

The FLRP has analysed direct and indirect project impacts on PAPs. The significance of impact was assessed as major for 'loss of physical area to trawler, gill net fisheries' during operation phase; and moderate for 'loss of physical area' during construction phase; the other impacts were assessed as minor, including 'disruption of/reduced access to fishing grounds', 'movement of fishing activities from one fishing ground to another', 'increase movement away from fishing activities' during construction and operation phases.

To mitigate the impacts on the PAPs, fisheries restoration activities were proposed, including the direct compensation payment, alternative employment opportunities and/or career services and the restoration of natural habitats (marine net-gain initiatives). Following the FLRP, the Project has reached the agreement with the TFA of the compensation payment calculated based on the Standards of Fishers Compensation for Offshore Wind Power Plants issued by the Fisheries Agency. The calculation of compensation to affected groups has followed the principles outlined in IFC Guidance Note 5.

Compensation eligibility criteria, engagement activities, and a grievance redress mechanism were outlined in the FLRP. The success or failure of mitigation and compensation was proposed to be monitored throughout the lifecycle of the plan until the completion audit.

5.5 Stakeholder Engagement Plan

Stakeholder engagement is embedded throughout the Taiwanese EIA process and is to be continuously undertaken throughout the project lifecycle, including the pre-construction stage, construction stage, and operation stage. The purpose of the Stakeholder Engagement Plan (SEP) is to outline the methodology for the identification, classification, engagement, and management of key project stakeholders. The FM1 Project's E&S team has developed the SEP as detailed in Appendix DAppendix D – Stakeholder Engagement Plan and summarised in this section.

5.5.1 Past Stakeholder Engagement Activities

The FM1 Project has undertaken a number of disclosure and consultation activities as part of the initial stakeholder engagement to understand public opinion and compensation requirements for the Project. The stakeholder engagement activities conducted to date, align with EIA requirements, are demonstrated in this section. Appendix E provides a summary of the key communication records with stakeholders related to fisheries types.

The FM1 Project has conducted its formal EIA public consultation, which involved relevant stakeholders such as local specialists, Non-Governmental Organisations (NGOs) and Government officials. These consultations primarily took place through public meetings, EIA panel reviews (expert review), committee reviews (regulator review), and community visiting events, in accordance with standard Taiwanese EIA practices. The key engagement activities undertaken during the EIA phase include:

- Disclosure of the FM1 Project details to the public through online platforms hosted at the Taiwanese Ministry level (i.e., the MOENV's official website);
- Public hearing meetings for the FM1 Project;
- Engagement meetings, particularly with the Taichung Fishermen's Associations (TFA), which represent the directly affected population;
- Interviews and surveys conducted with local residents, fishers, and key opinion leaders.

5.5.2 Future Stakeholder Engagement Activities

To ensure an understanding of the evolving needs and expectations of stakeholder, addressing issues and cultivating relationships, a stakeholder analysis was conducted for current and ongoing engagement activities. Details of future planned engagement sessions, communication strategies, stakeholders' attitude (positive, neutral or negative) toward the Project were documented in the SEP (see Appendix DAppendix D – Stakeholder Engagement Plan). The communication strategies tailored to different key project stakeholders in the SEP are summarised below:

General Public:

- Community engagement events including beach-cleaning and sponsorship/participation in activities hosted by local townships
- Monthly project meetings to update entire team on project progress and issues.
- Procurement processes outline communication mechanisms to communicate and updates changes relevant to contractor employees.
- Grievance mechanism outlined in Grievance plan to address any issues which arises during the development, construction and operational phases of the project

Government agencies and state-owned entities:

- Reach out only when necessary and/or is summoned
- Reach out and communicate when necessary
- Regular progress meeting, information sharing and issue shooting
- Cooperation for marine / environmental educational events
- Maintain frequent dialogue for harbour leasing, construction of facilities, grid connection

Association and Non-Governmental Organisations:

- Frequent dialogue for relationship building and compensation negotiation
- Prior notice when construction or offshore maintenance is taking place
- Regular information sharing
- Regular meetings for PR for better social acceptance and lobby towards the government through their public hearings in Legislative Yuan
- Information sharing regarding environmental knowledge

Media:

- Conduct regular media exposures, such as issuing press release for promotion, tailored media gathering, specific media placement, media tour etc.
- Cooperation for media exposures of important events

Academia:

- Formulate different programs to train the students, such as Apprenticeship programme with university.
- Provide students with internship and part-time job opportunities, such as employing university's students for part-time assistant in local sessions in Taichung.
- Arrange ad-hoc lectures from CIP colleagues or affiliated suppliers.

In addition, the Project has committed to establish an Environmental Supervisory Committee (ESC) under the framework of Taiwanese EIA. The ESC will be a volunteer group that will be continuously informed about, and provide input on, environmental issues related to the FM1 Project. The ESC is expected to comprise at least 15 members with the following composition:

- Not less than one third of members are scholars and researchers in relevant fields.
- Not less than one third members are from NGOs and representatives of local residents and fishermen.

5.6 Grievance Redress Mechanism

The Fengmiao 1 Grievance Plan and Procedure (the “Plan”) has been developed as part of the FM1 Project SEP (see Appendix F). The Plan takes into account of employees, contractors, local communities, and other relevant stakeholders that may be affected by the activities of the Project, both at FM1’s Taiwan head office in Taipei and the FM1 Project’s local office and activities in Taichung. The Plan seeks to comply with the IFC Performance Standards, by establishing accessible platforms for potentially affected employees, contractors, stakeholders, and communities and providing prompt, transparent, and reasonable response to grievance received, without any cost or retribution to the complaining parties.

A grievance management and response task force (“Grievance Unit”) shall be formed. The Grievance Unit shall be in charge of receiving, recording, managing and coordinating the evaluation and response of all grievances. The key grievance procedures developed for the FM1 Project are summarised below:

- **Receiving Grievances:** Stakeholders may submit a complaint through various methods, including verbal complaint, online complaint form, email/letter to the FM Preparatory Office. Upon receipt of a complaint, the company should provide a response within a prescribed period of time. The Grievance Unit shall also contact the complainant if any clarification is required.
- **Classification and Evaluation:** Upon receiving the grievance, the Grievance Unit shall assess and classify it into one of the classes (Minor Case, Significant Case, Major Case). The Grievance Unit shall identify relevant internal business departments and/or external stakeholders, organize meeting(s) for further evaluation, and propose potential corrective actions (if applicable) for discussion.
- **Responding Grievance:** The FM Preparatory Office must inform the complainant about the results of the grievance within twenty (20) business days, regardless of the decision made in relation to the grievance report. If the complainant is not satisfied with the grievance response, the Grievance Unit shall organize a meeting with the complainant and relevant stakeholders to reach a further agreement.
- **Record:** Each grievance case, including anonymous complaint, shall be recorded in the Grievance Registry maintained and updated by the Grievance Unit.
- **Communications:** A summary of grievance mechanism shall be published and communicated to all stakeholders during local community meetings, on the FM1 Project’s website, through internal meetings with employees or contractors, in the form of posters or in other ways considered suitable by the FM1 Project, in a clear, appropriate and easily understandable manner.

6. Conclusion and Recommendation

The FM1 Project has received an EIA approval under the Taiwanese Environmental Impact Assessment Act 2023 (as amended). This process has embedded stakeholder communication and has committed to environmental and social mitigation and compensation measure to reduce predicted impacts. The assessments undertaken to inform the EIA have provided the foundation for further assessment work, summarised in this NTS, to meet the requirements outlined under the IFC’s Performance Standards and other internationally recognised standards for E&S assessments. The significant impacts, as concluded in the SLIP assessment, are the social and financial impacts on fisheries, which are subject to additional baseline data validation and monitoring.

The Environmental and Social Management Plan (ESMP) developed by the Project plays an important role in minimizing identified impacts, achieving net biodiversity gain and acquiring stakeholders’ support. It is recommended to utilise existing project knowledge and undertake continual monitoring and research for the unknown areas to better understand and manage potential E&S risks. This can be strategically planned and delivered by the Project ESMP and other implementation plans.

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Appendix A – Summary of EIA Baseline Data

Item	Categorisation	Baseline summary ⁵	Reference from the EIA	Survey information from the EIA
1	Macrobenthos	Dominant species: Offshore zone <ul style="list-style-type: none"> ▪ <i>Acetes intermedius</i> (NE); ▪ <i>Spatangoida</i> spp.; ▪ <i>Nereididae</i> spp.. ▪ <i>Portunus sanguinolentus</i> (NE); ▪ <i>Harpisquilla harpax</i> (NE); ▪ <i>Charybdis miles</i> (NE); Intertidal zone <ul style="list-style-type: none"> ▪ <i>Amphibalanus Amphitrite</i> (NE) ▪ <i>Saccostrea mordax</i> (NE) ▪ <i>Littorinidae</i> sp. (NE) 	Section 6.3.2	Survey locations: 30 locations, including 18 in the offshore zone and 12 in the intertidal zone (different 6 stations for 1 st season and rest of the three seasons respectively) covering wind farm, Taichung export cable corridor and its intertidal zone Survey time: October, November 2020, January, February, April, May, July and August 2021 Surveyed and assessed by: Hong Yi ecological Co., Ltd.
2	Phytoplankton and zooplankton	Dominant species: Phytoplankton <ul style="list-style-type: none"> ▪ <i>Trichodesmium erythraeum</i> (NE) ▪ <i>Nitzschia</i> spp. ▪ <i>Paralia sulcata</i> (NE) ▪ <i>Chaetoceros curvisetus</i> (NE) ▪ <i>Chaetoceros socialis</i> (NE) Zooplankton <ul style="list-style-type: none"> ▪ <i>Calanoida</i> spp. ▪ <i>Cyclopidae</i> spp. ▪ <i>Noctiluca</i> spp. 	Section 6.3.2	Survey locations: 18 locations located at the wind farm and Taichung export cable corridor Survey time: November 2020, February, May and August 2021 Surveyed and assessed by: Hong Yi ecological Co., Ltd.

⁵ The conservation status from the IUCN Red List of Threatened Species (IUCN, 2024) is presented (if described) for species identified in the EIA. It categorised species into Not Evaluated (NE), Least concern (LC), Near Threatened (NT), Vulnerable (VU), Endangered (EN) and Critically Endangered (CR).

Appendix A – Summary of EIA Baseline Data

Item	Categorisation	Baseline summary ⁵	Reference from the EIA	Survey information from the EIA
3	Marine mammals	<p>FM's EIA survey:</p> <ul style="list-style-type: none"> Common dolphin <i>Delphinus delphis/capensis</i> (LC) Bottlenose dolphin <i>Tursiops truncatus/aduncus</i> (LC) <p>Literature review in EIA (sighting data in Changhua area):</p> <ul style="list-style-type: none"> Finless porpoise <i>Neophocaena</i> spp. <ul style="list-style-type: none"> Indo-Pacific finless porpoise <i>N. phocaenoides</i>. (VU) Narrow-ridged finless porpoise <i>N. asi-aorientalis</i> ⁶ Rough-toothed dolphin <i>Steno bredanensis</i> (LC) False killer whale <i>Pseudorca crassidens</i> (NT) Taiwanese humpback dolphin (TWD) <i>Sousa chinensis ssp. Taiwanensis</i> (CR) 	Section 6.3.4	<p>Survey locations:</p> <p>Offshore visual survey in the wind farm areas</p> <p>Survey time:</p> <ul style="list-style-type: none"> 20 trips (days) from February – September 2021 Literature review from 1995-2021 <p>Surveyed and assessed by:</p> <p>Dr. Pey-Yi Lee (The Centre of Excellence for Ocean Engineering, National Taiwan Ocean University).</p>
4	Migratory/pelagic fish	<p>Dominant species and CR or EN species⁷:</p> <ul style="list-style-type: none"> Japanese scad <i>Decapterus maruadsi</i> (LC) Pawak croaker <i>Pennahia pawak</i> (LC) Threadfin porgy <i>Eyvinnis cardinalis</i> (EN) Scalloped hammerhead <i>Sphyrna lewini</i> (CR) 	Section 6.3.3	<p>Survey locations:</p> <p>3 transect lines within and outside the wind farm area</p> <p>Survey time:</p> <p>November 2020, February, May and July 2021</p>
5	Demersal fish	<p>Dominant species and CR or EN species:</p> <ul style="list-style-type: none"> Pale-edge sharpnose ray <i>Dasyatis zugei</i> (VU) Yellow spotted skate <i>Okamejei hollandi</i> (VU) Boeseman's skate <i>Okamejei boesemani</i> (VU) 		<p>Surveyed and assessed by:</p> <p>Dr. Kwang-Tsao Shao, (Biodiversity Research Center, Academia Sinica)</p>

⁶ The narrow-ridged finless porpoise, *N. asi-aorientalis* was included in the EIA literature review and previously listed as Endangered. However, recent research has split it into either two species (Zhou *et al.*, 2018) or subspecies (Yin *et al.*, 2022): *N. asi-aorientalis asi-aorientalis* (for the freshwater population restricted to the Yangtze River) and *N. asi-aorientalis sunameri* for the remaining population. There is little population information, but it occurs in shallow inshore waters less than 50 m deep (IUCN, 2024).

⁷ Dominant species with percentage more than 20% in each seasons and CR or EN species are presented.

Appendix A – Summary of EIA Baseline Data

Item	Categorisation	Baseline summary ⁵	Reference from the EIA	Survey information from the EIA
6	Birds surveyed off-shore	<p>Boat-based visual survey</p> <ul style="list-style-type: none"> ▪ Bridled tern <i>Onychoprion anaethetus</i> (LC) ▪ Black-naped tern <i>Sterna sumatrana</i> (LC) ▪ Common tern <i>Sterna hirundo</i> (LC) ▪ European herring gull <i>Larus argentatus</i> (LC) ▪ Red-necked phalarope <i>Phalaropus lobatus</i> (LC) ▪ Masked booby <i>Sula dactylatra</i> (LC) ▪ Streaked shearwater <i>Calonectris leucomelas</i> (NT) ▪ Bulwer's petrel <i>Bulweria bulwerii</i> (LC) ▪ Swinhoe's storm-petrel <i>Oceanodroma monorhis</i> (NT) ▪ Barn Swallow <i>Hirundo rustica</i> (LC) ▪ Little Bunting <i>Emberiza pusilla</i> (LC) ▪ Great Egret <i>Ardea alba</i> (LC) <p>Boat-based radar survey</p> <ul style="list-style-type: none"> ▪ Detection of signals were mostly distributed at the height of 500 m and above throughout the year ▪ Direction of signals were mostly toward south or south-east in autumn, summer and winter; and toward north in spring 	<p>Section 6.3.5.3</p> <p>Section 6.3.5.4</p>	<p>Survey locations:</p> <ul style="list-style-type: none"> ▪ Boat-based visual survey: 8 transect lines within the wind farm area ▪ Boat-based radar survey: 2 fixed-station within the wind farm area <p>Survey time:</p> <ul style="list-style-type: none"> ▪ Boat-based visual survey: 8 times in total (November 2020, February, March, May, June, July, August, November 2021) ▪ Boat-based radar survey: 30 times in total (November, December 2020; March, April, May, June, July, August, September, October 2021; January 2022) <p>Surveyed and assessed by: Hong Yi Ecological Co., Ltd.</p>
7	Bird surveyed in the intertidal zone	<ul style="list-style-type: none"> ▪ Black-winged kite <i>Elanus caeruleus</i> (LC) ▪ Little tern <i>Sternula albifrons</i> (LC) ▪ Osprey <i>Pandion haliaetus</i> (LC) ▪ Saunders's gull <i>Saundersilarus saundersi</i> (VU) ▪ Brown shrike <i>Lanius cristatus</i> (LC) ▪ Oriental pratincole <i>Glareola maldivarum</i> (LC) ▪ Eastern marsh-harrier <i>Circus spilonotus</i> (LC) ▪ Grey-faced buzzard <i>Butastur indicus</i> (LC) ▪ Common kestrel <i>Falco tinnunculus</i> (LC) ▪ Chestnut Munia <i>Lonchura atricapilla</i> (LC) 	<p>Section 6.3.5.2</p>	<p>Survey locations: 12 intertidal bird survey stations in Taichung area.</p> <p>Survey time: 13 times in total between October 2020~ March 2022</p> <p>Surveyed and assessed by: Hong Yi Ecological Co., Ltd.</p>

Appendix A – Summary of EIA Baseline Data

Item	Categorisation	Baseline summary ⁵	Reference from the EIA	Survey information from the EIA
8	Bats surveyed off-shore	<ul style="list-style-type: none"> No species was recorded. 	Section 6.3.6	<p>Survey locations: 2 fixed points within the wind farm area</p> <p>Survey time: 19 times within four seasons from November, 2020 – September 2021.</p> <p>Surveyed and assessed by: Hong Yi Ecological Co., Ltd.</p>
9	Seawater quality	Values of all items at the OWF and Taichung export cable corridor stations and its intertidal zone meet the Marine Environment Classification and Marine Environment Quality Standards (海域環境分類及海洋環境品質標準) (2018) by MOENV.	Section 6.2.5	<p>Survey locations:</p> <ul style="list-style-type: none"> 12 locations covering the wind farm 8 locations covering Taichung export cable corridor and its intertidal zone <p>Survey time: December 2022, February and March 2021</p> <p>Surveyed and assessed by: Envimac Technology and Consultants Corporation.</p>

Appendix A – Summary of EIA Baseline Data

Item	Categorisation	Baseline summary ⁵	Reference from the EIA	Survey information from the EIA
10	Marine sediments	<ul style="list-style-type: none"> Only values of Cadmium in three stations within OWF exceeded the Probable Effects Levels (PELs) specified by the National Ocean and Atmosphere Administration, NOAA (1993)⁸. 	Section 6.2.5	<p>Survey locations:</p> <ul style="list-style-type: none"> 12 locations covering wind farm 6 locations covering Taichung export cable corridor <p>Survey time: February 2021</p> <p>Surveyed and assessed by: Envimac Technology and Consultants Corporation.</p>
11	Underwater noise	Background Sound Pressure Level (SPL) within the band of 20~20k Hz is between 108.6~139 dB re 1 μ Pa.	Section 6.2.4, and Appendix 10	<p>Survey locations: 6 stations within wind farm area; 1 location within the boundary of the TWD Major Wildlife Habitat</p> <p>Survey time: March, 2021</p> <p>Surveyed and assessed by: Dr. Chen, Chi-Fang (Department of Engineering Science and Ocean Engineering, National Taiwan University)</p>

⁸ Owing to the lack of a local standard, Sediment Quick Reference Tables (SQUIRT) (1999) from NOAA were compared in the Project's EIA (<https://www.nrc.gov/docs/ML0720/ML072040354.pdf>)

Appendix A – Summary of EIA Baseline Data

Item	Categorisation	Baseline summary ⁵	Reference from the EIA	Survey information from the EIA
12	Metoccean	<ul style="list-style-type: none"> Waves: the wave directions are mainly north. Currents: the speed of current varies among seasons. The average flow speed is approximately 38.1 cm/s Tide: Mean high water level throughout the year is 2.073 m 	Section 6.2.2	<p>Survey locations (from secondary data):</p> <ul style="list-style-type: none"> Waves: 1 station at Taichung harbour Currents: 1 station at Taichung harbour Tide: 1 station at Taichung harbour <p>Survey time: Survey time varies among monitoring reports</p> <p>Data source and assessed by :</p> <ul style="list-style-type: none"> Central Weather Administration, Transportation Technology Research Center Dr. Sung-Shan Hsiao (Department of Harbor and River Engineering, National Taiwan Ocean University)
13	Bathymetry/geotechnical	<ul style="list-style-type: none"> Bathymetry: the slopes encountered in the windfarm are relatively gentle compared to the nearby areas. Water depth is approximately 50~70 m. Geologic drilling: main sediment are silty sand, silty clay, clayey silt, clayey sand 	Section 6.2.7	<p>Survey locations: The whole of FM Wind Farm Area</p> <p>Surveyed and assessed by: Dr. Sung-Shan Hsiao (Department of Harbor and River Engineering, National Taiwan Ocean University)</p>

Appendix B – Summary of mitigation measures

Source	Pathway	Receptors	EIA impact rating	EIA/WHDP Mitigation measure(s) ⁹
BD01 – Installation activities associated with turbines foundations and cable installation	Changes in seabed morphology and substrate	Benthic communities	Not quantified	<ul style="list-style-type: none"> Only one foundation pile driving operation and one foundation installation ship piling operation will be conducted at any given time to reduce the incidents of broad scale construction activity. [minimize] To reduce the interference to sea water bodies caused by the construction of wind turbine foundation, submarine cable laying and other construction work, a construction plan will be developed and the construction progress will be actively controlled. [minimize]
		Fish	Not quantified	
	Increase in suspended sediment concentration	Benthic communities	Not quantified	<ul style="list-style-type: none"> Only one foundation pile driving operation and one foundation installation ship piling operation will be conducted at any given time to reduce the incidents of massive construction activity. [minimize] To reduce the interference to sea water bodies caused by the construction of wind turbine foundation, submarine cable laying and other construction work, a construction plan will be developed and the construction progress will be actively controlled. [minimize] Silt curtain will be used if the constructions are within water depth of 5 meter at the coastal area to prevent the dispersion of pollution. [minimize]
		Fish	Not quantified	
BD02 – Hydraulic piling of the turbine foundations	Increased underwater noise	Marine mammals	Not quantified	<ul style="list-style-type: none"> The feasibility of using the suction bucket foundations will be evaluated if seabed conditions from the geological drilling studies allow. [minimize] Piling will begin with a ‘soft start’ and gradually ramp up to the full-force piling operation. This process will take at least 30 minutes. [minimize] Only one foundation pile driving operation and one foundation installation ship piling operation will be conducted at any given time. Simultaneous
		Marine reptiles	Not assessed	
		Fish	Not quantified	
		Benthic communities	Not quantified	

⁹ Mitigation measures are assigned to the hierarchy: avoid, minimize, restore, and (if necessary) offset. They are defined as: 1) avoid: measures taken to avoid creating impacts on biodiversity and associated ecosystem services; 2) minimize: measures taken to reduce the duration, intensity and/or extent of impacts that cannot be completely avoided, as far as is practically feasible; 3) restore: measures taken to restore degraded ecosystems where impacts cannot be completely avoid-ed and/or minimised; and 4) offset: measures taken to compensate for the residual negative impacts on biodiversity after every effort has been made to avoid, minimize and restore.

Appendix B – Summary of mitigation measures

Source	Pathway	Receptors	EIA impact rating	EIA/WHDP Mitigation measure(s) ⁹
				<p>piling operations on two or more than two foundation piles will not occur. [minimize]</p> <ul style="list-style-type: none"> • Piling operation for a new foundation will not begin within 1 hour of sunset but will be delayed until sunrise the next day. [minimize] • If the piling operation of a wind turbine is temporarily halted after reaching the safe depth to perform another turbine's piling operation, then the piling operation will be resumed during the day following a new piling operation procedure. [minimize] • The 'Acoustic Monitoring' and 'Visual Observation' will be utilized for overseeing operations throughout the foundation piling period. The commencement of the foundation piling operation is only permitted once it has been confirmed that no cetacean activities have occurred in the exclusion zone (with a radius of 750 meters from the center of the turbine foundation) for a continuous duration of 30 minutes. [minimize] • Throughout the wind turbine piling process, preventive measures such as 'double bubble curtains', 'hydro sound dampers', 'partial bubble curtains built into the guide frame', or 'other commercialized best noise control methods' will be implemented. Underwater noise monitoring will be conducted continuously. An early warning mechanism and contingency planning will be implemented to ensure ongoing monitoring of the underwater noise levels. [minimize] • When the construction vessels pass through the Taiwanese White Dolphin Major Wildlife Habitat and within 1,500 meters radius of its boundaries, the vessels' speed will be under 6 knot; when cetacean are identified when passing through other sea areas, the speed will also be adjusted to 6 knot or below. [minimize] • The Project will delineate an exclusion zone with a radius of 750 meters from the center of the turbine foundation and the precautionary zone with a radius of 750 to 1,500 meters from the center of the turbine foundation. The acoustic monitoring and visual observation will be conducted during piling. If cetaceans are observed in the exclusion zone during piling, the constructor will halt piling operation as long as safety allows and restart

Appendix B – Summary of mitigation measures

Source	Pathway	Receptors	EIA impact rating	EIA/WHDP Mitigation measure(s) ⁹
				<p>piling progressively after the cetaceans have left the exclusion zone for 30 minutes. If cetaceans are observed in the precautionary zone, observations and the direction of movement will be recorded to ensure the cetaceans not moving towards the exclusion zone. [minimize]</p> <ul style="list-style-type: none"> • Acoustic Monitoring: Four underwater acoustic monitoring facilities will be installed 750 meters from the turbine centre in four orientations to detect if there are activities of cetaceans around the area continuously. [minimize] • Visual Observation: At least four qualified Taiwanese cetacean observers will be assigned on a construction vessel for visual observation of the exclusion zone (within 750 meters) and the precautionary zone (within 750 meters to 1,500 meters) throughout piling operations. [minimize] • For piling at nighttime, the visual observation will be supported by a thermal imager capable of monitoring for 1,500 meters to further provide relevant information for the constructor to adopt countermeasures. [minimize] • The cetacean observers of the Project are not allowed to serve as the crew of the construction vessel or workers of the Project; personnel should be responsible independently for cetacean observation and underwater acoustics and underwater noise monitoring without multi-tasking. [minimize] • Noise Monitoring and Control during Piling: Underwater noise will be monitored and controlled throughout piling. [minimize] <ul style="list-style-type: none"> ○ Four underwater noise monitoring facilities will be installed 750 meters from the turbine center in four orientations to monitor underwater noise levels continuously. ○ The accumulated numbers of SEL₀₅ (Sound Exposure Level) that are over 160 dB re.1 μPa²s should not be more than 5% of the total number at 750 meters from the foundation centre of turbine. ○ The maximum limit of SPL (Sound Pressure Level) is 190 dB re.1 μPa at 750 meters from the foundation centre of turbine. • Warning Mechanism and Contingency Plan for Underwater Noise: The warning level at 750 meters from the turbine center for a single (average within 30 seconds) piling event is set at SEL 158 dB re.1 μPa²s. Detected

Appendix B – Summary of mitigation measures

Source	Pathway	Receptors	EIA impact rating	EIA/WHDP Mitigation measure(s) ⁹
				underwater noise at the warning level will be reported to the construction team for appropriate countermeasures depending on the onsite situation. Examples of the countermeasures include the adjustment of the pile hammer power or piling speed, or strengthening noise mitigation measures (e.g. increasing air supply for bubble curtains) to control the underwater noise effectively by prompt response. The whole process from noise monitoring, communications, measures adopting, to mitigating the noise level should be completed within a few minutes to ensure the effectiveness of countermeasures. [minimize]
BD03 – Landing of the export cable	Disturbance of the intertidal ecosystem	Shorebirds, intertidal benthos	Minor	<ul style="list-style-type: none"> Plan the cable-laying construction work before construction. Avoid the cable laying construction work during bird migratory season (November to March) if underground construction methods are not used at the intertidal area [avoid] Apply underground construction methods in the intertidal zone to reduce impacts on ambient environment [avoid/minimize] Appropriate waste management [minimize] Education and training for all staff for habitat protection [minimize] Silt curtain will be used if the constructions are within water depth of 5 meter at the coastal area to prevent the dispersion of pollution. [minimize] During the gathering and migration time of waterbirds in April, observation will be made.. If more than 500 waterbirds are identified within 100 meters on both sides of the intertidal cable laying area, the construction will be temporarily stopped. [minimize]
BD04 – Increased marine traffic	Increase in underwater noise; collision	Marine mammals	Not quantified	<ul style="list-style-type: none"> Vessel Speed Control during foundation pilling phase: When construction vessels traverse the TWD Major Wildlife Habitat and its surrounding area within a radius of 1,500 meters, the vessel speed should be maintained at less than 6 knots. If cetacean are sighted in other marine areas, the speed of the construction vessels will also be reduced to less than 6 knots. [minimize] Vessel Speed Control during marine cable laying: When laying a submarine cable within the TWD Major Wildlife Habitat and within a radius of 1,500
		Marine reptiles	Not assessed	

Appendix B – Summary of mitigation measures

Source	Pathway	Receptors	EIA impact rating	EIA/WHDP Mitigation measure(s) ⁹
				<p>meters from its boundary, the marine cable construction vessel will plan to assign two cetacean observers for monitoring, with additional personnel on rotation, if cetaceans are observed within 750 meters of the marine cable construction vessel during the marine cable construction, the vessel's speed will be reduced to less than 3 knots. [minimize]</p> <ul style="list-style-type: none"> The cetacean observers cannot be the crew on the installation or construction vessel at the same time. [minimize]
BD05 – Operation/presence of wind turbines	a. Low frequency underwater noise	Marine mammals	Not quantified	No mitigation measures are reported by the EIA.
		Marine reptiles	Not quantified	
		Fish	Minor	
	b. Collision	Regularly occurring seabirds, migratory raptors and migratory waterbird	Species dependant	<ul style="list-style-type: none"> Spaces for bird passage corridors are reserved (east-west and south-north directions) [avoid/minimize]. <ul style="list-style-type: none"> The space between the wind turbines is planned to be ≥ 870 m; the space between the blades is planned to be > 400 m. The space between the project wind farm and boundaries of neighbouring wind farms is planned to be >700 meter; the breadth between the blades of project's wind farm and neighbouring wind farms is planned to be >400 meter. 2 km spacing between the north and the south areas of FM1.
		offshore bats	Not assessed	
	c. Displacement of fisheries	Marine mammals, marine reptiles, fish	Not assessed	No mitigation measures are reported by the EIA.
BD06 – Operation of offshore cables	EMF	Cartilaginous fishes such as sharks, sting-rays, and eels	Minor	No mitigation measures are reported by the EIA.

Appendix C – E&S Management Framework

	Document Title	Description
0.0 Environmental and Social Management System Overview		
0.1	Environmental and Social Management Plan (ESMP)	The ESMP has been created to provide a framework for assessing E&S risks, providing mitigation and management in accordance with both international good practice and Taiwanese requirements and to provide a framework of related documentation (policies, plans, procedures etc.). The ESMP creates a mechanism allowing the Project to identify and comply with relevant legislation, permitting and authorisation obligations as well as enabling international good practice standards to be implemented
1.0 Policies		
1.1	Health & Safety Policy	Outline of HSE goals and objectives from the management team
1.2	Environmental & Social Policy	Outline of the Environmental and Social goals and objectives from the management team
1.3	Drug & Alcohol Policy	This Policy outlines the zero tolerant approach to drugs and alcohol including betel nuts on the Project
1.4	Smoking Policy	This policy outlines to provide a smoke-free environment in all project premises, to achieve a healthier and pleasant workplace, safeguard non-smokers from the risks to the health of passive smoke and protect the project sites from increased risk of fire.
2.0 Organisation		
2.1	FM1 HSE, Consents and Stakeholder Management Organisation	Organisational structure related to Environmental and Social Matters
2.1.1	FM1 Hiring and Training Plan	Overview of project's training and hiring procedure and structure
3.0 Consents Management		
3.1	FM1 Consents Management Procedure	Project consents management process & tools
3.2	FM1 Regulatory Overview	Overview of relevant regulations for development and construction of offshore wind farms
3.3	FM1 Consents Index	List of consents required, and approvals received
3.4	FM1 Consents Programme	Detailed schedule showing sequencing and timing of consents
3.5	FM1 Consents Reporting Plan	Internal and external reporting plan
4.0 Obligations Management		
4.1	FM1 Compliance Management Procedure	Overview of project obligations management process & tools
4.1.1	FM1 Compliance Register	Tool for consolidating and monitoring consent obligations
5.0 Stakeholder Management		
5.1	FM1 Stakeholder Engagement Plan	Overview of project stakeholders and communication strategy

	Document Title	Description
5.1.1	FM1 Stakeholder Management Log	Record of stakeholder consultations and plan for future consultations & meetings
5.2	Community Health, Safety and Security Plan	Identify issues and risks to the community arising from the Projects activities
5.3	Nearshore Sustainable Development Fund - Terms of Reference	Overview of fund principles and scope
5.3.1	Nearshore Sustainable Development Fund - Overview	Overview of the fund
5.3.2	Nearshore Sustainable Development Fund - Implementation Plan	Detailed plan for implementation of the NSDF fund
6.0 Grievance		
6.1	Grievance Mechanism	Process for managing internal and external complaints
6.1.1	Grievance Mechanism Log	Record of logged grievances
6.2	Grievance Mechanism Internal and External Training	Internal and External training materials
6.2.1	Grievance Mechanism Internal and External Training Log	Record of attendance for Grievance Mechanism Training
7.0 Environmental Management		
7.1	Construction Environmental Management Plan	Overview of environmental commitments and management processes
7.2	Operation Environmental Management Plan	Management plan for project specific environmental obligations
7.3	Biodiversity and Ecosystem Impact Assessment Report (BEIA)	Re-evaluate the impacts to biological receptors in the Project's EIA under standardised EIA methods to report the significance of the impact
7.3.1	Critical Habitat Assessment (CHA)	Identification of critical habitats and assessment of changes in biodiversity resulting from the Project development
7.3.2	Cumulative Impact Assessment (CIA)	Identify the receptors and relevant development that potentially contribute the impacts cumulatively to the receptors and to evaluate the impacts
7.3.3	Environmental Ecosystem Service Impact Assessment (ESR-IA)	Identify measures to mitigate project impacts on the benefits provided by priority ecosystems
7.3.4	Biodiversity Action Plan (BAP)	To provide a framework for the management of biodiversity (including ecosystem goods and services) within the Project
7.3.4.1	BAP Implementation Plan	Tool for tracking action progress
7.4	Environmental Monitoring Plan	Tool for recording and monitoring EM pre-construction /construction /post construction deliverables
7.5	Emergency Response Plan	Outlines the roles and responsibilities of those managing an emergency response situation, provision of contact details and what the step-by-step process is
7.6	Waste Management Plan	Minimum requirements and obligations outlined with regards to waste management
7.7	Environmental Supervisory Committee Terms of Reference	Overview of peer group process to oversee project Environmental Monitoring results
8.0 Fisheries Management		
8.1	Fisheries Livelihood and Restoration Plan	Overview of impact assessment, compensation, and monitoring measures

	Document Title	Description
8.2	Term Sheet - Fishery Compensation and Collaboration Agreement	Agreement between project and local fishery association.
8.3	Fishery Management Plan	Tool for recording and monitoring all fishery related commitments and activities under the Fisheries Livelihood and Restoration Plan (FLRP), compensation agreement, Fishery Revitalisation Initiatives (FRI) report and Stakeholder Engagement Plan (SEP)
9.0 Land Management		
9.1	FM1 Land Index	Index of Land Agreements
10.0 Procedures		
10.1	Marine Mammal Mitigation Protocol	Demonstrate the Project intends to comply with the EIA requirements around noise in the marine environment
10.2	Minimum Training and Standards Procedures	Outlines the minimum training and standards required in order to gain access to the project site
10.3	Dropped Objects Procedure	Minimum requirements and guidelines when dropped objects occur in the marine environment
10.4	Bunkering Transfer Procedure	Minimum requirements and guidelines when undertaking bunkering activities
10.5	Offshore Construction Site Environmental Induction	Minimum requirements for contents of offshore inductions
10.6	Onshore Construction Site Environmental Induction	Minimum requirements for contents of onshore inductions
10.7	HSE Communications and Consultation Procedure	Outlines how the Project plans to communicate and consult of matters regarding HSE, such as Meetings, TBTs, Noticeboards, Newsletter, Lunch and Learns
10.8	Incident Reporting and Investigation Procedure	Outlines the roles and responsibilities and the steps to take in reporting, recording and investigating any incident on the Project
10.9	QHSE Observation Card Procedure	Outlines the procedure for personnel to identify a positive / negative act / condition via a QHSE Observation Card
10.10	Management of Hazardous Materials Procedure	Minimum requirements and guidelines when transporting, handling and storing hazardous materials
10.11	Marine Mammal and Reptile Rescue Procedure	Outlines the roles and responsibilities of those involved, provision of contact details and what the step-by-step process is
11.0 Forms		
11.1	Incident Report Form	Form template required to be completed by personnel who are involved in an incident or accident
11.2	HSE Alert Template	Form template to be completed by those who have HSE information to share - could be in the form of a lessons learned, outcome of a previous incident etc.
11.3	QHSE Observation Card Template	Form template required to be completed by personnel who identify a positive / negative act / condition. Raising cards raise the QHSE culture by praising positives and/or by highlighting issues and putting them right before they lead to an accident
11.4	Contractors' Monthly Dashboard Template	Report to be completed by the Contractor and submitted to the Project each month
11.5	Incident Investigation Form	Template to be completed when investigating a HSE incident

	Document Title	Description
11.6	Dropped Objects Incident Report Form	Form to report dropped objects that occur offshore that have an environmental effect
11.7	Offshore Chemical List Form	Contractor to complete to list all chemicals they plan to use so that the Project can approve their transportation, storage and use
11.8	CMT Incident Message Form (part of the ERP)	A record to capture key messages and responses. It is of particular use when communicating with external organisations, or requesting resources
11.9	CMT Incident Activity Log Form (part of the ERP)	A record of ongoing decisions / actions to manage the incident
11.10	CMT Incident Briefing Form (part of the ERP)	A record to capture the overall incident situation and is to be used for transferring information between participants of the incident response, e.g. from Site Manager to Duty Controller, from Duty Controller to ERT Leader, or during shift handovers
11.11	CMT Contacts List Form (part of the ERP)	To record how each key participant / resource can be contacted
11.12	CMT Incident Resources Worksheet Form (part of the ERP)	A record of key equipment and relevant technical capacity, that is available to assist in managing the incident
A1 Human Rights Risk Assessment Report		
A1.1	Human Rights Risk Assessment Report	Overview of the Project's legal and social context of human right impact and to assess the risk level and to review the mitigation actions
A2 Climate Change Risk Assessment		
A2.1	Climate Change Risk Assessment Report	A high-level climate-related information and assessment in making climate-resilient decisions for the Project.
A3 Social Impact Assessment		
A3.1	Social Impact Assessment	A systematic assessment to evaluate the Project's social risk/impact and to develop relevant measures
A4 Labor Management Plan		
A4.1	Labor Management Plan	A plan to manage labour risks for the Project
HSE		
	Health and Safety Management Plan	Provides outline of how H&S will be managed on the project
	HSE Camp Inspection Form	Inspection form to be completed when undertaking a HSE inspection of camp / accommodation facilities

Appendix D – Stakeholder Engagement Plan

Fengmiao1 Offshore Wind Farm

Stakeholder Engagement Plan

Project Name	Fengmiao1 1 Offshore Wind Farm Project
Document Number	
Package Code	
Originator Company	
Contractor Doc No.	(if any)
Document Type	(please refer to MDR)
Revision	
Document Status	IFR (or IFI)
Classification	External
Date	03.12.2024
Author	
Reviewed By	
Approved By	



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1. Introduction

The purpose of this Stakeholder Engagement Plan (SEP) is to outline the methodology for the identification, classification, engagement and management of key project stakeholders for the Fengmiao 1 Offshore Wind Farm Project (hereinafter “FM1” or “FM1 Project”).

2. Stakeholder Engagement in the Fengmiao 1 Offshore Wind Farm Project

Stakeholder management is essential to a project’s success throughout all phases of project development, construction and operation. It can be achieved by implementing the following steps:

- a. Identify the people, groups or organizations that could impact or be impacted by the project. Analyse and document relevant information regarding their interests, involvement, interdependencies, influence and potential impact on project success.
- b. Plan effective engagement with stakeholder groups based on their needs, interests and potential impact on project success.
- c. Manage engagement by communicating and working with stakeholders to meet their needs, expectations, address issues as they occur and foster appropriate stakeholder engagement activities.
- d. Evaluate engagement outcomes by monitoring overall project stakeholder relationships and adjusting strategies and plans for future engaging approaches.

Continuously conducting effective communication with stakeholders is key to project success. It is important to familiarise the project team with the importance of stakeholder management. It is also important to ensure understanding of the changing needs and expectations of stakeholders, addressing issues resulting from conflicts of interests, and fostering relationships with stakeholders within different project activities.

Fengmiao 1 Project recognises that cultural and historical awareness must be incorporated into the stakeholder engagement plan. Culturally, according to Hofstede’s six dimensions of culture (ref: The 6 Dimensions of National Culture by Geert Hofstede), Taiwan has a relatively high score on the Power Distance dimension and Taiwan scores relatively low on the Individualism dimension.

One area of particular relevance to the Fengmiao 1 Offshore Wind Farm Project is Taichung, the second largest city in Taiwan by population and stands as crucial hub in central Taiwan. Taichung boasts Taichung Port, an international gateway facilitating trade and entrepot of offshore wind turbine component; on the other hands, Taichung Airport plays a pivotal role in regional connectivity. These infrastructural assets make Taichung an essential focal point for the successful development and operation of the wind farm project.

The approach described in the following section of this document has been taken by the Fengmiao 1 Offshore Wind Farm Project to create a comprehensive, effective and agile stakeholder engagement plan. This approach is aligned with the internationally recognised Project Management Institute, a guide to the Project Management Body (PMBOK).

3. Stakeholder Engagement Methodology

The steps outlined in this section describe how the Fengmiao 1 Offshore Wind Farm Project identify, engage and manage stakeholders.

3.1. Identify stakeholders

The FM1 project uses a stakeholder mapping process to identify individuals, groups, and organizations that may be impacted by the project, both directly and indirectly. To ensure impartiality of the outcomes, FM1 project follows below principles while conducting stakeholder identification:

- the identification process is based on information which is in a culturally appropriate local language(s) and format and is understandable to affected communities;
- the identification process is free of external manipulation, interference, coercion, or intimidation;
- the identification process enables meaningful participation, where applicable

The identification process incorporates various sources, such as:

- Consultations with local industry representatives and government bodies.
- Analysis of public announcements, media reports, and other official communications.
- Field visits to project sites in Taichung to engage with local stakeholders and gather insights.
- Subject matter expert input to capture potential social, economic, and environmental impacts.

Once identified, stakeholders are listed in a project stakeholder register and categorized according to their role and influence. The primary categories include:

- General Public
- Government Agencies and State-Owned Entities
- Associations and Non-Governmental Organizations (NGOs)
- Media
- Academia

Following the categorization, the FM1 project further ranks stakeholders based on two key factors:

- Their level of support for offshore wind initiatives: This factor assesses stakeholders' attitudes and predispositions towards the project, ranging from strong support to opposition.
- Their influence on the FM1 project: This considers the power and impact each stakeholder can have on the project's success, whether through regulatory authority, public opinion, or expert input.

Based on this ranking, the FM1 project designs specific engagement strategies and approaches tailored to different stages of the project—development, construction, and operation.

By systematically identifying, categorizing, and ranking stakeholders, the FM1 project ensures that engagement is both strategic and responsive, fostering positive relationships and addressing concerns effectively throughout the project lifecycle.

3.2. Plan stakeholder engagement

Strategy and approach of engagement was noted in the stakeholder register for all stakeholders. This was used to set out a plan for all the engagement activities that will be required during the project lifetime. The plan is guided by the Informed Consultation and Participation (ICP) framework and the IFC Stakeholder Engagement Manual, ensuring that stakeholder engagement is meaningful, transparent, and inclusive.

In terms of stakeholder analysis, this document will assess each stakeholder with techniques such as power/influence analysis and support analysis are utilized to understand the dynamics at play. Stakeholders with high influence and

Appendix D – Stakeholder Engagement Plan

high supportiveness require more intensive engagement strategies, while those with lower influence or interest might need different approaches. This analysis informs the development of a stakeholder engagement plan, which outlines specific objectives, methods, and the frequency of engagement for each group. The plan ensures that communication is tailored to meet the diverse needs of stakeholders, facilitating meaningful and effective interactions.

As emphasized by both ICP and the IFC Stakeholder Engagement manual, the implementation of engagement activities will be executed with transparency, inclusiveness, and responsiveness.

To facilitate effective engagement, FM1 project may disclose relevant project information to stakeholders via various channels, including:

- Project website
- Social media
- Mandatory disclosure on government websites
- Official letters
- E-mails and phone calls
- Timetable for Information Sharing and Consultation

A structured timeline guides the flow of information and engagement activities to ensure stakeholders are informed and involved throughout the project lifecycle:

- Development phase.
- Construction phase.
- Operation phase.

3.3. Implement stakeholder engagement

Based on the stakeholder engagement register, the stakeholder meetings, forums, public consultations and engagement activities are carried out with date, location, attendees and key notes being recorded from each one in the stakeholder engagement log.

A stakeholder engagement taskforce is established in the project team, responsible for planning and execution of actual engagement activities. Headed by Stakeholder Manager, the taskforce consists of at least two local stakeholders officers dedicated to local engagement, two senior consultants dedicated to governmental agencies engagement, one manager-level personnel dedicated to academia engagement, and one manager-level personnel dedicated to media engagement, altogether 7 FTEs.

For detailed information, please refer to Appendix 1: Organizational Chart, which outlines the taskforce's structure and key roles.

3.4. Evaluate stakeholder engagement

The stakeholder engagement plan must remain agile and adaptable. It is reviewed and updated quarterly following the procedures outlined in Appendix 2.

Fengmiao 1 Offshore Windfarm Project has completed various reviews of the stakeholder engagement plan with a view to managing key stakeholder satisfaction and expectation. It is an on-going operation to align these stakeholders with the project updates and objectives. Successfully managing our stakeholders is key to successful project development, construction and operation.

In case of any dispute, disagreement or controversy, a specific grievance handling process has been developed by the project team to systematically seek resolution. The process is specified in following project documents:

- 6.1 FM1 Grievance Mechanism - Plan and Procedure
- 6.1.1 FM1 Grievance Log_20240704
- 6.2 FM1 Grievance Mechanism Internal and External Training
- 6.2.1 FM1 Grievance Mechanism Internal and External Training Log

3.5. Engagement of impacted and vulnerable groups

Due to the location of FM1 project and the highly regulated nature of infrastructure projects, FM1 will have limited and mitigatable impact on its surrounding environment from the aspects of ecosystem services, biodiversity and cultural heritage. Located in public land both offshore and onshore, FM1 project will not involve in land change or physical change related concerns. FM1 project may have impact to local fishermen due to access restriction of certain sea areas during construction, therefore Taichung fishermen is identified as an impacted group and a specific management plan is developed for managing fishermen related matters. Please refer to Fishery Management Plan for detailed information.

A thorough process has been carried out to identify potential vulnerable groups of FM1 project, with its methodology, survey data and results stated in the project's Social Impact Assessment (SIA) and the Human Right Risk Assessment (HRRR). It has been identified that the vulnerable groups may include the following:

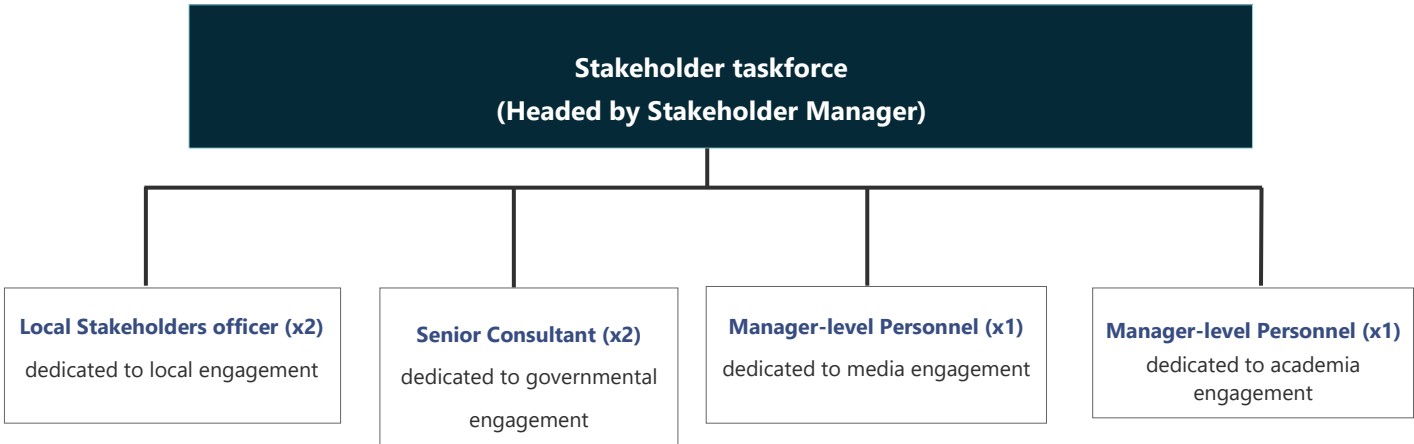
- Fishermen households headed by female, senior, disable, or indigenous people
- Migrant workers among fishermen

Appendix D – Stakeholder Engagement Plan

Below approaches have been specified to ensure fair and sufficient engagement for the impacted and vulnerable groups:

Impacted / vulnerable groups	Description	Approach
Fishermen and Migrant workers among fishermen	Fishing activities could be affected during FM1 construction and operation	<ul style="list-style-type: none"> Regular meetings with Taichung Fisherman's Associations to facilitate sound engagement with fisherman Public briefing session to explain measures taken by FM1 to lower impact on fishing activity and for fishermen to express grievance Training sessions offered to improve knowledge and skills for fishery transformation Fishery compensation negotiation which will be conducted in accordance with regulations Distribution list of fishery compensation to be provided by TFA to the project Communication of grievance channels
Fishermen households headed by female, senior, disabled, or indigenous people	Potential socio-economic changes due to offshore wind farm development activities	<ul style="list-style-type: none"> Public briefing session to explain measures taken by FM1 to lower potential impact and for communities to express grievance Public educational sessions to allow better awareness and understanding of offshore wind and renewable energy Regular meetings with local district office to understand any concerns from community Distribution list of fishery compensation to be provided by TFA to the project Training sessions offered to improve knowledge and skills for fishery transformation Access to ESG initiatives sponsored by the project Communication of grievance channels

4. Appendix 1 Stakeholder Engagement Taskforce



5. Appendix 2 Stakeholder Engagement Plan Update Procedure

To ensure timeliness, the following procedure will be implemented quarterly to facilitate prompt feedback and timely corrective actions. The Stakeholder Engagement Plan must be reviewed and updated quarterly throughout the project development, construction and operational phases.

- a. Each quarter a date will be set for the Stakeholder Engagement Plan Review Meeting. The following attendees are required:
 - a) Programme Director
 - b) EPC Director
 - c) Chief Development Officer
 - d) HSE Director
 - e) Local Stakeholder Officer
 - f) Project Stakeholder Manager

In addition to abovementioned personnels, following individuals will be invited depending on subject matter:

- a) Project team members having interaction with the stakeholders
 - b) Management of CI Service Co. (CISC)
 - c) Management of Copenhagen Infrastructure Partners (CIP)
- b. The meeting agenda will be:
 - a) Confirm minutes of previous meeting.
 - b) Review stakeholder engagement register, adjusting the support/ influence scores and communication strategy as appropriate.
 - c) Review Stakeholder Engagement Log (previous quarter, next quarter)
 - d) Evaluate stakeholder engagement effectiveness
 - e) Add new stakeholders as appropriate.
 - f) Confirm key issues to be brought forward at staff, government or public meetings.
 - g) Project Stakeholder Manager to circulate minutes of meetings to all participants.
 - h) AOB.
 - i) Set date for next meeting.
- c. The effectiveness of stakeholder engagement should be assessed using the following indicators, with data collected as outlined below:
 - a) Stakeholder participation: Measured by the number of meetings, consultations, or engagement events held per quarter.
 - b) Stakeholder satisfaction: Evaluated through feedback collected from participants during or after engagement activities to assess their level of satisfaction and concerns.
 - c) Timeliness of engagement: Assessed by whether engagement activities are completed on or before scheduled project milestones, and whether issues are resolved within an acceptable timeframe.
- d. The stakeholder engagement planning and management system currently does not include project decommissioning phase as it will happen in 25-30 years from now. The SEP will be updated accordingly to include decommissioning scope when the timing is more mature.

Appendix E – Summary of stakeholder engagement activities to date (template)

[illegible]

Appendix F – Grievance Mechanism Plan and Procedure

Fengmiao 1 Grievance Mechanism Plan and Procedure

Document Title:	Fengmiao 1 Grievance Mechanism – Plan and Procedure
Document Number	FM1 xxx
Package Reference	General
Originator Company	FM1
Contractor Doc No.	N.A.
Document Type	
Revision	Rev 5
Document Status	
Classification	
Date	30.12.2024
Author	Brenda Chang
Reviewed By	Po-Hsiang Ou
Approved By	

1 Introduction to Grievance Plan

This Fengmiao 1 Grievance Plan and Procedure (the “Plan”) is designed for implementing grievance mechanism of the Fengmiao 1 Offshore Wind Farms (the “Project” or “FM1”) located in Taichung, Taiwan. The Plan takes into account of employees, contractors, local communities, and other relevant stakeholders that may be affected by the activities of FM1, both in FM1’s Taiwan head office in Taipei and the Project’s local office and activities in central Taiwan. The Plan seeks to comply with the IFC Performance Standards, by establishing accessible platforms for potentially affected employees, contractors, stakeholders, and communities and providing prompt, transparent, and reasonable response to grievance received, without any cost or retribution to the complaining parties.

The next section of this Plan will show the Project’s online portal for comments and/or complaints. A complainant may choose different channels to communicate with the Project, such as emails, or online feedback form.

The final section of this Plan includes FM1’s Grievance Procedure, which governs the Project’s internal process for receiving, evaluating, and responding grievance. The Procedure will be distributed to relevant FM1 staff.

2 Grievance Portal and Forms

FM1, as part of Copenhagen Infrastructure Partners (CIP)'s Taiwan Round 3 portfolio, is introduced on CIP's Taiwan Round 3 website (<https://www.ciptwr3.com/>), where information about ESG and the Project, as well as contact details, which include email address and a link to online feedback form, can be found.



Figure 2-1 Grievance Portal



The screenshot shows a web-based feedback form for the Fengmiao Project. At the top, there is a header with the project logo and name in both Chinese and English. Below this, the form title is 'CIP風妙離岸風電計畫意見回饋' and 'Fengmiao Project Feedback Form'. A paragraph in both Chinese and English explains the purpose of the form: to collect feedback on environmental and social activities. Below the text is a sharing section with a link and a 'Not shared' status. A red asterisk indicates required questions. The form contains four input fields: '姓名 Name', '連絡方式 Contact details', '服務單位及稱謂 Company name & title', and '您的意見回饋 Your feedback *'. At the bottom, there are 'Submit' and 'Clear form' buttons.

Figure 2-2 Feedback Form

In addition to the above online platforms, the local office will also communicate other potential grievance channels during meetings with local communities.

Internal grievance (i.e. complaints from employees of FM1 project entities or their contractors, suppliers, or consultants) can be submitted through the above external portal and form. Internal grievance can be done anonymously and the principles of this Plan will be communicated to users of internal grievance during employee onboarding process.

3 Procedure for Grievance Mechanism

3.1. Purpose and Definition

3.1.1. This Procedure for Grievance Mechanism (the “Procedure”) applies to complaints raised by any internal or external stakeholders with regard to any activities of the Fengmiao 1 Offshore Wind Farms (the “Project”). The purpose of this Procedure is to:

- Define a transparent and reliable method of timely receiving, evaluating and responding to grievances.
- Prevent negative impacts due to the Project’s activities; and
- Identify stakeholders’ concerns and ensure effective risk management.

3.1.2. In this Procedure, “grievance” means any complaint or proposal from employees, contractors, local communities, fishermen and other stakeholders on the Project’s activities or business conducts. The word “grievance” and “complaint” are used interchangeably in this Procedure.

3.2. Grievance Unit

3.2.1. A grievance management and response task force (“Grievance Unit”) shall be formed. The Grievance Unit shall be in charge of receiving, recording, managing and coordinating the evaluation and response of all grievances.

3.2.2. The composition of the Grievance Unit shall be:

- First responder to the complaint
- Representatives from FM1’s Taipei Office: Brenda Chang
- A representative from local office: Yulu Chan
- HSE Director of the Project: Kellie Field
- Legal representative of the Project: Joyce Chang

- 3.2.3. The above members may be replaced or adjusted on an ad hoc basis, if a certain member is considered to have direct and serious conflicts of interests in relation to a particular complaint**
- 3.2.4. Training related to gender issues will be arranged to at least one of the Grievance Unit members. At least one of the below training courses will be taken:**
- Sexual Harassment Overview course by Modern Women's Foundation
 - Gender-based Violence (GBV) online course By Unicef

3.3. Receiving Grievances

- 3.3.1. Stakeholders may submit a complaint through various methods, including:**
- Filling up online complaint form on [<https://forms.gle/kwf66gJQTWiWmANM6>]
 - Sending an email to [TW-Inquiry@cisc.dk]
 - Sending a letter to [30F, Sec. 5, Zhongxiao E. Rd., Xinyi District 11065 Taipei, Taiwan]
 - Submit in person
- 3.3.2. If a complaint is submitted to departments of the Project other than the Grievance Unit, the receiving department shall forward the complaint to the Grievance Unit within two (2) business days. Before proceeding with a formal grievance, complainants are encouraged to consider whether there are alternative resolution methods available. Employees should first attempt to resolve the issue informally by discussing it directly with the person involved. This step can often lead to quicker and less formal resolutions. If direct communication does not resolve the issue, employees may involve their supervisor or a mediator to facilitate a discussion aimed at finding a solution.**
- 3.3.3. The Grievance Unit shall, within five (5) business days from the initial receipt of the complaint, inform the complainant that the Project will respond within twenty (20) business days. In case of verbal complaints, written notification to the complainant shall be provided (if possible), for recording and maintaining the correspondence. The Grievance Unit shall also contact the complainant if any clarification is required.**

3.3.4. If a complaint is deemed to be outside the scope of grievance mechanism, the Grievance Unit shall reject it in writing and give explanation why the complaint is beyond the scope of grievance and provides a guide to where to address the problem (if applicable).

3.3.5. No acknowledgement or response is required for anonymous complaints. However, anonymous complaints shall still be recorded and processed internally for evaluation and potential improvements.

3.4. Classification and Evaluation

3.4.1. Upon receiving the grievance, the Grievance Unit shall assess and classify it into one of the following classes:

- Minor Case: small and occasional incidences with limited damages that may be compensated monetarily
- Significant Case: incidences with substantial damages caused directly or indirectly by the Project's activities
- Major Case: incidences of non-compliance with law and regulations

3.4.2. The Grievance Unit shall identify relevant internal business departments and/or external stakeholders, organize meeting(s) for further evaluation, and propose potential corrective actions (if applicable) for discussion.

3.4.3. Based on the above discussion and evaluation, the Grievance Unit shall prepare a grievance report with proposed actions. Grievance reports of Significant and Major Cases shall be submitted to the CEO and the deputy CEO of the Project, whereas those of Minor Cases may be decided directly by the Grievance Unit.

3.5. Responding Grievance

3.5.1. The Project must inform the complainant about the results of the grievance within twenty (20) business days, regardless of the decision made in relation to the grievance report. However, this does not apply to a complaint that is made anonymously.

3.5.2. In case where the grievance response agree or partially agree with the request of the complainant, the Grievance Unit shall coordinate

implementation of the approved actions and inform the complainant about the relevant next steps and activities planned.

- 3.5.3. In case where the grievance response reject the request, reasons of refusal shall be provided to the complainant, with further guidance on how the problem may be addressed through other means (if applicable).**
- 3.5.4. If the complainant is not satisfied with the grievance response, the Grievance Unit shall organize a meeting with the complainant and relevant stakeholders to reach a further agreement. If no amicable solution can be reached after reasonable efforts of the Project, the Grievance Unit may direct the complainant to other formal platform for potential legal remedies.**
- 3.5.5. A grievance case is considered closed if: 1) no further comments or complaints about the case are made by the complainant after thirty (30) days of receiving the grievance response; 2) the escalation process described in Section 3.5.4 has been duly performed; or 3) in case of anonymous complaints, a grievance report has been produced.**
- 3.5.6. Zero tolerance for retaliation: Retaliation against employees who raise concerns, participate in investigations, or support others in doing so is strictly prohibited. This includes any adverse action affecting their role, pay, or work environment.**

3.6. Record

- 3.6.1. Each grievance case, including anonymous complaint, shall be recorded in the Grievance Registry maintained and updated by the Grievance Unit.**
- 3.6.2. The Grievance Registry shall include the following information:**
- Content and background of the grievance case
 - Name and contact details of the complainant (if applicable)
 - Classification of the grievance case
 - Relevant internal departments and/or external stakeholders
 - Summary of approved grievance report and response
 - Final status of the grievance case upon closing

3.6.3. The Grievance Registry, the present Plan, as well as other related documents are maintained by representatives from FM1's Taipei Office.

3.6.4. The Grievance Registry, if the complainant would like to be kept confidential, will be registered as anonymous.

3.6.5. The Grievance Plan and Procedure and the Grievance Registry files are stored in the SharePoint folder of FM1 project named "Grievance", with restricted access only granted to FM1 Grievance Unit and Project CEO & Deputy CEO. A password to open the grievance log is mandatory and only the members of Grievance Unit will have access to it.

3.7. Communications

3.7.1. A summary of grievance mechanism shall be published and communicated to all stakeholders during local community meetings, on the Project's website, through internal meetings with employees or contractors, in the form of posters, presentations, or in other ways considered suitable by the Project, in a clear, appropriate and easily understandable manner.

- Examples of communications settings include but not limited to:
 - Community meetings
 - Project meetings
 - Employee, consultant, or contractor onboarding meetings
 - Contractor regular meetings

3.7.2. Stakeholders shall be informed and emphasized that there will be no costs for any complaints, and the grievance mechanism does not prejudice any legal or administrative remedies that the complainant may seek.

3.7.3. Stakeholders shall also be informed that anonymous complaints are possible, and such anonymous complaints will still be processed.

3.7.4. Any collection, use, processing and storage of personal data in relation to this Procedure shall be done in compliance with the Personal Information Protection Act of Taiwan.

Appendix

Whistleblower Policy

CONCERNING

Any subsidiary of Copenhagen Infrastructure P/S and Copenhagen Infrastructure II P/S outside of Denmark

1 Introduction and purpose

- 1.1 This Whistleblower Policy describes the purpose of introducing a Whistleblower Arrangement (hereinafter the "Arrangement"), how it works, who can make use of the Arrangement, and what may be reported through the Arrangement.
- 1.2 This Whistleblower Policy covers any subsidiary of Copenhagen Infrastructure P/S and Copenhagen Infrastructure II P/S outside of Denmark (hereinafter referred to as "CIP"). **Reference is made to Appendix 1 to this Whistleblower Policy.**
- 1.3 **The Arrangement is subject to local law in the country of which the affected company is located. In case of any discrepancies between this Whistleblower Policy and local law, local law shall apply. Consequently, the following sections of this Whistleblower Policy shall apply, unless otherwise regulated in local law.**
- 1.4 The purpose of the Arrangement is to ensure that a Whistleblower, as defined in this Whistleblower Policy, can swiftly and confidentially, through a special, independent and autonomous channel, report violations or potential violations within the scope of this Arrangement, allowing an independent and autonomous whistleblower unit to assess which steps are required in this respect.

2 Who can use the Arrangement?

- 2.1. The Arrangement can be used by persons who report information on violations the person in question has gained access to in connection with his or her work-related activities, and who belong to the following categories of persons (hereinafter referred to as "Whistleblower"):
 - a) Employees
 - b) Self-employed persons
 - c) Members of the executive board, board of directors
 - d) Volunteers
 - e) Paid or unpaid trainees
 - f) Persons working under the supervision and management of contracting parties, subcontractors, and suppliers
 - g) Persons who are reporting or publishing information to which they have gained access in a work-related relationship that has ceased since then
 - h) Persons in work-related relationships that have not yet commenced, who report information on violations they have gained access to during the course of the recruitment process or other pre-contractual negotiations
- 2.2. Persons listed under section 9.4 can also file reports under the Arrangement.
- 2.3. Persons not included in the categories of persons stated in sections 2 or 9.4 cannot file reports under the Arrangement but have to report through ordinary communication channels.

3 What may be reported through the Arrangement?

- 3.1. The Arrangement covers reports regarding serious offences or other serious matters (see section 3.4 i)) as well as reports regarding violations (see section 3.4 ii)).
- 3.2. "Violations" means acts or omissions that
 - i) are illegal or constitute a serious offence or other serious matters comprised by section 3.4; or
 - ii) allow circumventions of the purpose of the rules under section 3.4.
- 3.3. Any information may be reported, including reasonable suspicion about actual or potential violations or serious matters comprised by section 3.4, which have occurred or most probably will occur at the affected company, as well as any attempts to cover up such violations.
- 3.4. The report must concern violations or potential violations, defined as acts or omissions which:
 - i) are serious offences or other serious matters, like for instance:
 - Violation of any duty of confidentiality
 - Abuse of financial means
 - Theft
 - Deceit
 - Embezzlement
 - Fraud
 - Bribery
 - Violation of industrial safety rules
 - Any form of sexual harassment
 - Severe harassment, e.g. bullying, violence, and harassment due to race, political or religious affiliation
 - ii) are illegal, including for instance:
 - Public procurement
 - Money-laundering
 - Protection of privacy and personal data
 - Security of network and information systems.
- 3.5. The Arrangement may only be used for reporting violations or potential violations in relation to the issues described in section 3.4 that have occurred or most probably will occur in the affected company, committed for instance by employees, executive board, or members of the Board of Directors of the company in question. In connection with reports on incidents committed by the company in question, please note that such incidents may be reported although the incident cannot be attributed to an individual person but may be due to a basic systemic failure at the company in question.

- 3.6. Offences that are not comprised by the Arrangement must be reported through ordinary communication channels.

4 Contents of the report

- 4.1. To facilitate further investigation of the reported issue, and to be able to identify the offence, it is important that the Whistleblower describes the offence in the best possible way. It is thus not possible to make any further investigations of a report if the report is not specified or if it only contains very general allegations without any further clarification.
- 4.2. Therefore, it is important that the Whistleblower - to the utmost extent - provides the following information:
- a description of the matter;
 - the person(s) involved;
 - whether others are aware of the suspicion about the matter;
 - whether the executive board knows about the matter;
 - whether documents exist that support the matter;
 - whether and where further information may be found about the matter;
 - for how long the matter has gone on; and
 - whether the Whistleblower knows about any attempts to hide the offence.
- 4.3. Manifestly unfounded reports will not be investigated further.

5 How can a report be submitted and who is to receive the report?

- 5.1. A whistleblower unit has been appointed, and the whistleblower unit
- a) will receive the reports and be in contact with the Whistleblower;
 - b) will follow-up on the reports; and
 - c) give feedback to the Whistleblower.
- 5.2. The whistleblower unit in charge of the tasks mentioned in section 5.1 consists partly of two lawyers from Plesner Law Firm (hereinafter "Plesner"), and partly of an impartial group of persons at the company in question.
- 5.3. Written reports are submitted through the following website: www.cip.com/whistle-blower/
- 5.4. Written reports are received by two lawyers at Plesner. Plesner will make a legal capacity assessment of the persons of the whistleblower unit who are able to process the report, after which the report will be forwarded to the relevant persons (hereinafter referred to as "Case Managers") in the whistleblower unit.
- 5.5. It is only possible to submit written reports under the Arrangement.
- 5.6. The whistleblower unit will treat all written reports as confidential.
- 5.7. The Case Managers appointed to receive and follow up on the reports are subject to a duty of confidentiality regarding the information contained in the reports.

6 Anonymity

- 6.1. The Whistleblower is encouraged to state his or her name when submitting a report so that the Case Managers are able to ask clarifying questions and subsequently provide feedback on the further course of the investigation. However, anonymous communication between Plesner and a Whistleblower who chooses to be anonymous is possible (see sections 6.4 and 6.5).
- 6.2. If the Whistleblower chooses to submit an anonymous report, it is recommended - to ensure full anonymity - that the Whistleblower uses a private PC or, for instance, a PC located at a public library.
- 6.3. Plesner will make a communication module available, allowing the Whistleblower to communicate with Plesner for the purpose of providing additional information about the reported matter, which Plesner will then pass on to the Case Managers.
- 6.4. The Whistleblower can provide additional information to Plesner through the communication module and remain anonymous. In connection with the reporting, a one-off code is generated which, in order to safeguard the anonymity, cannot be re-created. Therefore, it is **important** that the Whistleblower keeps the code and remembers to log on the communication module to communicate with the whistleblower unit.
- 6.5. The communication module can be accessed through the above-mentioned link under the Arrangement (see section 5.3) to log on the communication module. If the Whistleblower chooses to be anonymous, it is important that the Whistleblower regularly enters the communication module to check whether Plesner has asked any questions. If the Whistleblower is anonymous, Plesner is not able to come into contact with the Whistleblower in any other ways, for instance to inform the Whistleblower that additional questions etc. have been submitted.

7 Information to the whistleblower

- 7.1. The Whistleblower will receive:
 - an acknowledgement of receipt of the report within three days of that receipt; and
 - feedback soonest possible and in principle within three months from the acknowledgement of receipt of the report.
- 7.2. "Feedback" means a notification about the measures taken by the company in question to assess the correctness of the allegations made in the report and, where relevant, to counter the reported offence. The feedback provided by the whistleblower unit must, at any time, observe the rules under local data protection law, which may entail limitations in relation to the contents of the feedback to the Whistleblower.
- 7.3. Depending on the circumstances, an extension of the timeframe for the feedback

may be required, where necessary due to the specific circumstances of the case, in particular the nature and complexity of the report, which may require a lengthy investigation. If this is the case, the Whistleblower must be notified in this respect.

8 Information to and protection of the reported person

- 8.1. After a preliminary investigation has taken place and all relevant evidence has been secured, the person concerned, i.e., the person reported under the Arrangement, will among other things be informed about:
- the identity of the Case Manager(s) responsible for the investigation of the report; and
 - the issues of the report.
- 8.2. The person concerned is entitled to protection of his or her identity during the case management and has a right to effective defence.
- 8.3. The reported person may have the right of access to information about the Whistleblower's identity where necessary for the reported person to exercise his or her right to an effective defence.

9 Protection of the whistleblower

- 9.1. The Whistleblower is protected against retaliation when submitting a report through the Arrangement, if the following conditions are fulfilled:
- The person submitting the report meets the conditions to be considered a Whistleblower (see section 2).
 - The Whistleblower had reasonable grounds to believe that the reported information was correct at the time of reporting and that the reported information falls under the scope the Arrangement (see section 3.4).
- 9.2. "Retaliation" means unfavourable treatment or unfavourable consequences as a reaction to a report. This may be suspension, dismissal, demotion, or equivalent measures.
- 9.3. If the Whistleblower submits a report in bad faith and is fully aware of the fact that the reported information is not correct, the Whistleblower is not protected against retaliation.
- 9.4. In addition to the group of persons mentioned in section 2, the protection described in this section 9 also applies to the following persons or entities:
- 1) Intermediaries, is a natural person who confidentially assists a whistleblower with the reporting process in a work-related context (for example, a representative of the whistleblower)
 - 2) Third parties who are connected to the Whistleblower and who risk being

subject to retaliation in a work-related context (e.g. a colleague).

- 3) Undertakings and authorities which the Whistleblower owns or works for or is otherwise connected with in a work-related context (e.g. an undertaking owned by the Whistleblower).

9.5. If the Whistleblower has deliberately revealed his or her identity in connection with a publication of the reported matter, the special considerations regarding the protection of the Whistleblower's identity are not applicable.

10 Data security and data storage

- 10.1. All reports under the Arrangement will be registered. The registration is subject to local data protection law.
- 10.2. All information reported through the Arrangement, including information on persons reported through the Arrangement, will be processed in accordance with applicable law.
- 10.3. All reports will be stored properly, and it will only be possible for relevant persons of the whistleblower unit to access the information.
- 10.4. A report falling outside the scope of the Arrangement will be closed in the Arrangement and - if relevant and with the Whistleblower's prior consent - forwarded to another relevant department.
- 10.5. In principle, reports will be deleted from the Arrangement 45 days after finalizing the processing, unless - and subject to local law - there is a legitimate reason to store the report for longer.
- 10.6. If the matter is reported to the police or another authority, the report will be closed in the Arrangement immediately after the case has been closed by the authorities in question.
- 10.7. If – on basis of the collected data – a disciplinary sanction is implemented against the reported person, or if there are other grounds justifying and requiring the continued storage of the data on the person concerned, such data will be stored, where an employee is involved, in the employee's personnel file.
- 10.8. Otherwise, the information is stored in accordance with the affected company's deletion policy.

11 Questions

- 11.1. If you have any questions regarding this Whistleblower Policy, contact CIPs Compliance function at compliance@cip.com.

12 Approval

12.1. This Whistleblower Policy was approved by the Board of Directors on 29 November 2023.

13 Approval history

Version:	Effective from:	Changes:	Performed by:
1	29 November 2023	Initiation	Board of Directors of CIP P/S and CIP II